

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (Choose an item.)
- Recertification Assessment (RA 1)
- Extension of Scope

Client Company Name / Parent Company: Genting Plantations Berhad
Client Company / Parent Company Address: 10th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia
Certification Unit: Genting Plantations (WM) Sdn Bhd - Genting Bukit Sembilan Estate
Location of Certification Unit: Kampung Batu Dua, Kuala Ketil 09300, Kedah, Malaysia
Date of Final Report: 31/10/2022

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Genting Plantations Berhad		
RSPO Membership Number	1-0086-06-000-00	Membership Approval Date	14/11/2006
Address	10th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Genting Plantations (WM) Sdn Bhd - Genting Bukit Sembilan Estate		
Location / Address	Kampung Batu Dua, Kuala Ketil 09300, Kedah, Malaysia		
Website	http://www.gentingplantations.com/		
Management Representative	Mr. Arunan Kandasamy	E-mail	arunan.kandasamy@genting.com
Telephone	+603-2333 6401	Facsimile	N/A

2. Certification Information			
Certificate Number	RSPO 673953	Certificate Start Date	18/09/2022
Date of First Certification	18/09/2017	Certificate Expiry Date	17/09/2027
Scope of Certification	Production of Fresh Fruit Bunches		
Visit Objectives	<p>Determination of the conformity of the client's management system, or parts of it, with audit criteria.</p> <p>Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</p>		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 1) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	N/A
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE119-60226938	International Sustainability and Carbon Certification (EU)	ASG Cert GmbH	31/05/2023
MSPO 682996	MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	27/01/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Genting Bukit Sembilan Estate	Kampung Batu Dua, 09300 Kuala Ketil, Kedah, Malaysia	5° 34' 35.04" N	100° 41' 09.57" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Bukit Sembilan Estate	1,180.06	2.15	51.95	1,234.16	95.62
Total	1,180.06	2.15	51.95	1,234.16	95.62

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Genting Bukit Sembilan Estate	221.23	11.19	615.40	332.24	958.83	221.23
Total (ha)	221.23	11.19	615.40	332.24	958.83	221.23

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7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Sep 2021 – Aug 2022)	Actual (Jul 2021 – Jun 2022)		Forecast (Sep 2022 – Aug 2023)
		Previous license period (Jul 2021 – Mar 2022)	Current license period (Apr 2021 – Jun 2022)	
Genting Bukit Sembilan Estate	21,900.00	12,252.85	4,193.98	20,339.00
Total	21,900.00	16,446.83		20,339.00

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Sep 2021 – Aug 2022)	Actual (Jul 2021 – Jun 2022)		Forecast (Sep 2022 – Aug 2023)
		Previous license period (Jul 2021 – Mar 2022)	Current license period (Apr 2021 – Jun 2022)	
N/A		N/A	N/A	
Total		N/A		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Sep 2021 – Aug 2022)	Actual (Jul 2021 – Jun 2022)		Forecast (Sep 2022 – Aug 2023)
		Previous license period (Jul 2021 – Mar 2022)	Current license period (Apr 2021 – Jun 2022)	
N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A		N/A

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Jul 2021	1,028.25	0.00	1,028.25
2	Aug 2021	946.52	0.00	946.52
3	Sep 2021	1,042.24	0.00	1,042.24
4	Oct 2021	1,134.01	0.00	1,134.01
5	Nov 2021	1,167.16	0.00	1,167.16
6	Dec 2021	1,232.50	0.00	1,232.50

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7	Jan 2022	1,420.37	0.00	1,420.37
8	Feb 2022	1,961.85	0.00	1,961.85
9	Mar 2022	2,319.95	0.00	2,319.95
10	Apr 2022	1,808.79	0.00	1,808.79
11	May 2022	1,499.36	0.00	1,499.36
12	Jun 2022	885.83	0.00	885.83
TOTAL		16,446.83	0.00	16,446.83

10. Summary of Certified Tonnage (MT) (not applicable for ISS)

Estimated last year (Sep 2021 – Aug 2022)	Actual (Jul 2021 – Jun 2022)		Forecast (Sep 2022 – Aug 2023)
	Previous license period (Jul 2021 – Mar 2022)	Current license period (Apr 2021 – Jun 2022)	
FFB	FFB		FFB
21,900.00 mt	12,252.85 mt	4,193.98 mt	20,339.00 mt
	TOTAL	16,446.83 mt	
CPO (OER: 20.50 %)	CPO (OER: 20.00 %)		CPO (OER: 20.00 %)
4,489.50 mt	2,450.57 mt	838.80 mt	4,067.80 mt
	TOTAL	3,289.37 mt	
PK (KER: 5.50 %)	PK (KER: 5.00 %)		PK (KER: 5.00 %)
1,204.50 mt	612.64 mt	209.70 mt	1,016.95 mt
	TOTAL	822.34 mt	

10A. Monthly Records of Certified CPO & PK since the last audit

No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	N/A	N/A	N/A
TOTAL		N/A	N/A

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11. Summary of Actual Volume sold					
Current License period (Apr 2021 – Jun 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	0.00	0.00	0.00	0.00	0.00
PK (MT)	0.00	0.00	0.00	0.00	0.00
Credits	0.00	0.00	0.00	0.00	0.00
Previous License period (Jul 2021 – Mar 2022)					
CPO (MT)	0.00	0.00	0.00	0.00	0.00
PK (MT)	0.00	0.00	0.00	0.00	0.00
Credits	0.00	0.00	0.00	0.00	0.00

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	N/A	N/A	N/A
TOTAL		N/A	N/A

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
1	N/A	N/A	N/A
TOTAL			N/A

12. Independent Smallholders Certified Tonnage (MT) / Volume									
	Estimated last year (Not Applicable)			Actual (Not Applicable)			Forecast (Not Applicable)		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
1	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A	N/A	N/A

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Not Applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (Not Applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A	N/A	N/A	N/A

Section 2: Assessment Process

Certification Body:

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

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2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 19 – 20/07/2022. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on 02/06/2022.

The approach to the audit was to treat the group of estates as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The Critical NC close out on-site assessment was conducted on **05/09/2022**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

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For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

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

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

Assessment Program						
Name (Mill / Supply Base)	Year 1 (Re-certification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)	
Genting Bukit Sembilan Estate	√	√	√	√	√	

Tentative Date of Next Visit: July 3, 2023 - July 4, 2023

Total Number of Mandays: 4.5 mandays

2.2 BSI Assessment Team

Name	Role	Competency
Muhammad Fadzli Masran (MFM)	Team Leader	<p>Education: Holds a Bachelor Degree in Forestry Science, University Putra Malaysia</p> <p>Work Experience: He has more than 10 years working experience in palm oil estate as Assistant Manager managing operations and sustainability implementation experience including workers’ welfare, workers’ occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. He involved in internal auditing on ISO9001 and ISO14001 standards.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course, Endorsed RSPO Lead Auditor Course, MSPO Lead Auditor Course, Endorsed RSPO Supply Chain Certification training course, MSPO Supply Chain Certification System (SCCS) Auditor training Course, CQI and IRCA Certified ISO 9001:2015 Lead Auditor Training Course, HCV and GIS Training and SMETA Requirements Training.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of Occupation Health Safety requirement, HIRARC, training, management plan, good agriculture practice, GHG and and RSPO supply chain requirements.</p>
Hafriazhar Mohd Mokhtar (HMM)	Team Member	<p>Education: Holds a Bachelor of Engineering (Hons.) Chemical Engineering, University Technology Malaysia</p>

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		<p>Work Experience: He has 20 years of working experience in multiple engineering disciplines emphasized on science, technology and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation and mining before auditing. In summary, his started his career as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in palm oil mill, Project Control Engineer (2008-2011) in mining and Auditor (2011-present) with accredited certification bodies.</p> <p>Training attended: He has completed Social Auditing & SMETA Training, HCV & HCS Introductory Training, ISO 45001 LA Training, MSPO LA Training, Endorsed RSPO SCCS LA Training, Endorsed RSPO P&C LA Training, ISO 9001 LA Training, ISO 50001 LA Training, and ISO 14001 LA Training.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit: During the assessment , he assessed on the aspects of Policy and commitment, Social requirements, contract agreement, human rights, workers’ welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue and RSPO supply chain requirements.</p>
Amir Bahari (AB)	Team Member	<p>Education: Holds a Bachelor of Science (Hons) in Chemistry, University Science Malaysia & a Diploma in Palm Oil Milling Tech/Management, Malaysian Palm Oil Board.</p> <p>Work Experience: He has more than 30 years of plantation experience including managing rubber factories, palm oil mills and estates. Since 2014 he has started auditing professionally for varies scheme including RSPO and MSPO for varies accredited certification body.</p> <p>Training attended: He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course & Endorsed RSPO P&C Lead Auditor Course.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit: During the assessment , he assessed on the aspects of mills and estates best practices, Legal Requirements, land & Legal issue environmental and HCV.</p>
Suhaili Sahari	Peer Reviewer	<p>Education: He holds a Bachelor Degree in Science majoring Industrial Chemistry from Liverpool University. He holds a Master Degree in Business Administration from Multimedia University, Malaysia. He holds a PhD in Economics & Muamalat from University Science Islam Malaysia</p> <p>Work Experience: He has more than 25 years’ experience in training, teaching, consulting, quality and production for both manufacturing and plantation operation as</p>

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		<p>well as education industry. He has experience conducting ISO, HACCP, Euro GAP, GLOBALG.A.P., RSPO, MSPO, Environment and Food Safety audits</p> <p>Training attended:</p> <p>He has completed Endorsed RSPO P&C Lead Auditor Course and RSPO/ASI Peer reviewer training.</p>
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Accompanying Persons:

Name	Role
Valence Shem	Observer

2.3 Assessment Plan

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

On-site Assessment

Date	Time	Subjects	MFM	HMM	AB
Monday, 18/07/2022	PM	Auditors travel to Sg. Petani.	√	√	√
Tuesday, 19/07/2022 Bukit Sembilan Estate	0900 - 0930	Opening meeting: <ul style="list-style-type: none"> • Opening presentation by audit team leader • Confirmation of assessment scope and finalize audit plan (including stakeholder’s consultation) 	√	√	√
	0930 - 1300	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
	1300 - 1400	Lunch break	√	√	√
	1400 - 1630	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	√	√	√
Wednesday, 20/07/2022	0900 - 1130	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,	√	√	√

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Date	Time	Subjects	MFM	HMM	AB
Bukit Sembilan Estate		records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)			
	1130 - 1200	Audit team discussion & preparation for closing meeting	√	√	√
	1200 - 1245	Closing briefing	√	√	√

Major NC Close Out Visit

Date	Time	Subjects	MFM
Sunday 04/09/2022	PM	Auditor Travelling	√
Monday 05/09/2022	09.00 – 09.15	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan 	√
	09.00 – 12.00	Verification on previous Major NC: <ol style="list-style-type: none"> 1. 2226313-202207-M1 2. 2226313-202207-M2 <ol style="list-style-type: none"> a. Site observation ,workers interview (individual and group session) if necessary b. Document review – implemented evidence 	√
	12.00 – 13.00	Closing Meeting	√
	13.00	Audit Team travel back	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	The time bound plan has included all the subsidiaries of Genting Plantations Berhad. The TBP includes all units in Malaysia and Indonesia. The detail of the subsidiaries and the management units is as per Approved Time Bound Plan below.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	No. As stated in the updated time bound plan which has been updated on 05/07/2022, the management of Genting Plantations Berhad has plan to certify all the complexes until October 2023. The updated time bound plan shows that the plan spans from year 2014 until year 2023. The delays are due to the following factors: 1) Some estates in Indonesia are in progress to obtain their Hak Guna Usaha (HGU). 2) PT SP, KMJ, DWK is in the process of obtaining Forest Release and Forest Exchange prior to HGU application. 3) RACP in progress for Genting Kencana Estate. 4) Standalone HCSA reports are in progress to be peer reviewed. 5) NPP in progress for PT SISM, PT SMA (additional areas) and PT KIU	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No new acquisitions as of Nov 2021. Nonetheless, there is a three parts of expansion of land area at PT Sepanjang Inti Surya Mulia i.e. Area 199 Ha, Area 100 Ha and Area 1,300 Ha. As per comment in table below, the required assessments were being conducted and in progress.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Updated TBP was submitted to RSPO.	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?	Updated TBP was submitted to RSPO. ACOP Reporting has been verified and found to be consistent.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	There are no lapses in implementation of the plan.	Complied

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<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>There are no fundamental failure in implementation of the plan.</p>	<p>Complied</p>
<p>Un-Certified Units or Holdings</p>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>NPP documents are publicly available at the RSPO website. Registered HCSA reports Completed Peer Review Reports are published at:</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>http://highcarbonstock.org/registered-hcsa-assessments/ Completed Peer Reviewed HCV reports: PT Agro Abadi Cemerlang: https://hcvnetwork.org/find-a-report/?acs-action=advanced-search PT Kharisma Inti Usaha: https://hcvnetwork.org/find-a-report/?acs-action=advanced-search PT Sawit Mitra Abadi: https://hcvnetwork.org/find-a-report/?acs-action=advanced-search PT Palma Agro Lestari Jaya: https://hcvnetwork.org/find-a-report/?acs-action=advanced-search PT United Agro Indonesia: https://hcvnetwork.org/find-a-report/?acs-action=advanced-search</p>	<p>Complied</p>
<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&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No outstanding land conflicts. <u>Indonesian Operating Units</u> SOP - CPD – 02-00.00 Mekanisme Penyelesaian Sengketa Lahan <u>Malaysian Operating Unit</u> SMP-GPB-18 Negotiation, Compensation and Handling Procedures. At the point of this assessment, based on the RaCP Tracker, Genting Plantations Berhad, has a total of 4 submitted LUCA which 3 of them have completed the review. There are 2 Concept Notes required which 1 of them has been submitted and approved. 3 Remediation Plans are required which 1 of them has been submitted.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with</p>	<p>No outstanding labour disputes. <u>Indonesian Operating Unit</u></p>	<p>Complied</p>

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RSPO P&C criterion 4.2	SOP - HRD-04-00.00 Penyelesaian Keluh Kesah <u>Malaysian Operating Unit</u> SMP-GPB-19 Complaints and Grievances	
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	In progress to obtain Hak Guna Usaha (HGU). Refer to TBP (9 Nov 2021)	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. Sustainability Dept conducts the internal audit. Positive Assurance Statement 2021 was made available for verification.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	None raised.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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

Approved Time Bound Plan

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of November 2021	Any unresolved non-compliances
1	Genting Plantations (WM) Sdn Bhd & Setiamas Sdn Bhd (100%)for estates Genting Oil Mill Sdn Bhd (100%) for mill	Genting Sri Gading Estate	Supply base for Genting Ayer Item Oil Mill, Johor, Malaysia	Dec, 2014	Certified	None
2		Genting Sungei Rayat Estate				
3		Genting Kulai Besar Estate				
4		Genting Tanah Merah Estate		Dec, 2015		
5		Genting Tebong Estate		July, 2015		
6	Genting Plantations (WM) Sdn Bhd (100%) for estate	Genting Selama Estate, Kedah, Malaysia		July 2019	Certified	None
7	Genting Oil Mills (Sabah) Sdn Bhd (100%) for Mill Genting Plantations Berhad (Estate)	Genting Sabapalm Estate, Sabah, Malaysia	Supply base for Genting Sabapalm Oil Mill, Sabah, Malaysia	Aug, 2015	Certified	None
8	Genting Tanjung Bahagia Sdn Bhd (100%) for estates Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Tanjung Estate, Sabah, Malaysia	Supply base for Genting Tanjung Oil Mill, Sabah, Malaysia	Aug, 2016	Certified	None
9		Genting Tenegang Estate, Sabah, Malaysia				
10		Genting Layang Estate, Sabah, Malaysia				
11		Genting Bahagia Estate,				
12	Landworthy Sdn Bhd (84%)	Genting Landworthy Estate, Sabah, Malaysia				

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13	Genting Tanjung Bahagia Sdn Bhd (100%) for estates	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah Oil Mill, Sabah, Malaysia	July, 2022		Concept Note for RACP approved on 19/11/2021. RACP plan submitted and approved on 04/04/2022. Initial Audit conducted in May 2022
14	Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Permai Estate, Sabah, Malaysia				
15		Genting Kencana Estate, Sabah, Malaysia				
16	Genting Oil Mills (Sabah) Sdn Bhd (100%) for estate and mill	Genting Jambongan Estate, Sabah, Malaysia	Supply base for Genting Jambongan Oil Mill, Sabah, Malaysia	Sept 2019	Certified	None
17	Genting Plantations Bhd Wawasan Land Progress Sdn Bhd (100%) Genting Oil Mills (Sabah) (Mill)	Genting Sekong Estate, Sabah, Malaysia	Supply base for Genting Trushidup Oil Mill, Sabah, Malaysia	Sept,2017	Certified	None
18	Asiaticom Sdn Bhd (100%) Sawit Sukau Usahasama Sdn Bhd(56%)	Genting Suan Lamba Estate, Sabah, Malaysia				
19	PT Sepanjang Intisurya Mulia (70%)	Mulia 1 & 2 Mulia 3 & 4 Mulia 5 & 6	Supply base for Mulia Oil Mill, Kalimantan, Indonesia	Oct, 2017	Certified	None
20	PT Sawit Mitra Abadi (70%)	Abadi 1 & 2 Abadi 3 & 4				
21	PT Sepanjang Intisurya Mulia (70%)	Area 199 Ha Area 1300 Ha	Supply base for Mulia Oil Mill,	Oct, 2023		In Process of NPP In Process of NPP In process of obtaining HGU.

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22	PT Sawit Mitra Abadi (70%)	Area 1000 Ha	Kalimantan, Indonesia			NPP Process In process of obtaining HGU. HCS Report completed peer review.
23	Genting Plantations Berhad (100%) Estate Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Mewah Estate, Sabah, Malaysia	Supply base for Genting Mewah Oil Mill, Sabah, Malaysia	Mar, 2017	Certified	None
24	Genting Plantations (WM) Sdn Bhd (100%)	Genting Bukit Sembilan Estate, Kedah, Malaysia		July, 2017	Certified	None
25	PT Globalindo Agung Lestari (60%)	Lamunti Barat Estate Lamunti Timur Estate I &II Mengkatip Estate I & II Bakuta Estate Plasma Timur & Barat	Supply base for Globalindo Oil Mill, Kalimantan, Indonesia	Aug, 2023		NPP and HCSA Report completed for PT UAI. HGU obtained for UAI.
26	PT United Agro Indonesia(60%)	PT UAI 1 & 2 UAI Plasma		Oct, 2023		
27	PT Susantri Permai (95%)	Puroh Estate Masaha Estate Zircon Hill Estate SP Plasma	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia	Oct, 2023 Oct, 2023		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
28	PT Kapuas Maju Jaya (95%)	Waterfall Estate I & II Muhun Estate I & II Talawang Estate I & II	Supply bases for Golden Hill Oil	Oct, 2023		

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		KMJ Plasma	Mill, Kalimantan Indonesia	Oct, 2023		Exchange prior to HGU application.
29	PT Dwie Warna Karya (95%)	Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate		Oct, 2023		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		DWK Plasma		Oct, 2023		
30	PT Citra Sawit Cemerlang (70%)	CSC Estates	Supply base for Mulia Oil Mill	Oct, 2023		In process of obtaining HGU. HCSA report completed review.
31	PT Surya Agro Palma (70%)	SAP Estate 1&2 SAP Estate 3&4 SAP Estate 5&6	Supply base for Cemerlang Oil Mill, Kalimantan, Indonesia	Sept, 2023		In process of obtaining HGU. HCSA report completed review.
		Plasma		Sept, 2023		
32	PT Agro Abadi Cemerlang (70%)	AAC 1 & 2		Sept, 2023		In process of obtaining HGU HCSA report completed review. Report not published yet.
		AAC 3 & 4				
		Plasma – KSK1, KMB, BSL		Sept, 2023		
33	PT Palma Agro Lestari Jaya (70%)	PALJ Estates		Dec, 2023		In process of obtaining HGU. HCSA report completed review.
		PALJ Plasma				
34	Knowledge One Investment Pte Ltd (85%)-PT Kharisma Inti Usaha (KIU)	KIU 1 & 2 KIU 3 & 4	Supply base for KIU Oil Mill	Dec 2022		NPP in progress. HCV report approved by HCVRN. HCSA report is completed and waiting for peer review.
		KIU Plasma		Dec 2022		

3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were two (2) Critical; zero (0) Minor nonconformities and no Opportunity For Improvement raised. The Genting Bukit Sembilan Estate Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2226313-202207-M1	Date Issued	20/07/2022
Due Date	18/10/2022	Date of nonconformity Closure	05/09/2022
Clause & Category (Critical / Minor)	6.2.1 - Critical		
Statement of Nonconformity:	Overtime payment was not documented on the pay slips of sample for piece rated workers		
Requirement Reference:	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.		
Objective Evidence:	Workers overtime for sampled workers for 1. Employee ID No: 02472, 2. Employee ID No: 02510, 3. Employee ID No: 26700, 4. Employee ID No: 02545 for the month of March 2022 and June 2022 was not documented in the pay slip. However, it was included and paid as the piece rate payment.		
Corrections:	To write down manually on the payslip - on the overtime hours, payment details, and also to brief/inform the four (4) workers accordingly.		
Root Cause Analysis:	Genting Plantations Business Application System – ‘Lintramax’ unable to calculate/display overtime for ‘piece rated’ workers because the system assumes that ‘overtime’ refers to only ‘Daily Rated’ workers. So, the system was tweaked to convert the ‘overtime’ into equivalent ‘piece rate’.		
Corrective Actions:	To convert ‘piece rated’ workers to ‘daily rated’ on days whenever the worker is expected to perform ‘overtime’. Memo to the office and field staff.		
Assessment Conclusion:	Major NC verification The estate has manually written the daily, overtime and Sunday works details on the workers’ payslips. Reviewed the payslips for sampled workers as follows: 1. Employee ID No: 02472,		

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	<p>2. Employee ID No: 02510, 3. Employee ID No: 26700, 4. Employee ID No: 02545</p> <p>The estate has conducted briefing to the sampled workers. Reviewed the briefing records and attendance records dated 05/08/2022</p> <p>The estate has conducted briefing on payslips and permanent piece rated workers to daily rated workers on the day the perform daily rate and over time works. Reviewed the briefing records and attendance records dated 05/08/2022.</p> <p>Noted during interview with sampled workers, they have been briefed and understand on the daily, overtime and Sunday works details on the workers' payslips.</p> <p>The Estate Manager has instructed all Office Staff and Field Supervisor to convert permanent piece rated workers to daily rated workers on the day they perform daily rate and over time works as per memo dated 15/08/2022.</p> <p>All permanent piece rated workers has been converted to daily rated workers when perform daily rate and over time works. Reviewed the check roll records and pay slips for the for the month of August 2022 for for sampled workers:</p> <p>1. Employee ID No: 02472, 2. Employee ID No: 26700, 3. Employee ID No: 02545 4. Employee with ID no. 02510 has been repatriated in August 2022.</p> <p>All the corrective action and evidence of implementation were found to be adequate and effectively implemented. The Major NC closed on 05/09/2022.</p>
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Non-conformity			
NCR Ref #	2226313-202207-M2	Date Issued	20/07/2022
Due Date	18/10/2022	Date of nonconformity Closure	05/09/2022
Clause & Category (Critical / Minor)	7.2.6 - Critical		
Statement of Nonconformity:	Monitoring on validity of Safety Data Sheet was not effectively implemented		
Requirement Reference:	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.		
Objective Evidence:	<p>During site visit at chemical store and fertilizer store Genting Bukit Sembilan Estate (Paya Kamunting Division), it was noted that the Safety Data Sheet (SDS) for Kenlly 20 WG dated 15/10/2014 and fertilizer Rock Phosphate dated 14/12/2016 were not reviewed after 5 years.</p> <p>As per CHRA report no. HQ/12/ASS/00/309-2022/001 June 2022 under Section 6.1.8 Safety Data Sheet (SDS) stated "The due date of the SDS needs to be monitored since suppliers must review SDS every 5 years or less".</p>		

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	This was also not compliance to OSHA 1994 Class Regulation 2013 section 13 (4) "Revise a SDS referred to in sub regulation if (b) More than five years elapsed since the last date of preparation or revision of the Safety Data Sheet".
Corrections:	Obtain latest SDS, and replace accordingly at both stores, and file at office.
Root Cause Analysis:	Inadequate SOP and awareness to check on the validity of SDS.
Corrective Actions:	To establish SOP on SDS validity (refer attachment). Awareness training to be conducted (on yearly basis) to the storekeeper on the new SOP and monitoring of SDS validity
Assessment Conclusion:	<p>Major NC verification</p> <p>Genting Plantations Berhad has established Standard Operation Procedure entitled Occupational Safety and Health (OSH): Safe Operating Procedure - "Pematuhan Helaian Data Keselamatan (SDS -Safety Data Sheet): AKKP 1994-Peraturan USECHH 2000 & Class 2013" (Safety Data Sheet Compliance (SDS - Safety Data Sheet): AKKP 1994-Requirement USECHH 2000 & Class 2013). Refer document no. OM-GPB-15, rev. 0 dated 28/07/2022.</p> <p>The estate has obtain the latest SDS for the chemicals (pesticides and fertilizers). Reviewed the SDS as follows:</p> <ol style="list-style-type: none"> 1. Chemical name: Krush (Glyphosate-Potassium 48/7% W/W) Revision date: 21/12/2020 (rev. 4.0) 2. Chemical name: Kenlly 20 WG (Metsulfuron-methyl 20%) Revision date: 13/03/2019 3. Chemical name: Rock Phosphate Revision date: 11/02/2020 <p>Sighted during site visit, the SDS was available in English and Bahasa Malaysia and displayed at the respective store.</p> <p>The estate has conducted training for SDS to workers involved in chemical storage. Reviewed the training records and attendance dated 05/08/2022</p> <p>All the corrective action and evidence of implementation were found to be adequate and effectively implemented. The Major NC closed on 05/09/2022.</p>

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	Good commitment and corporation from the management.
PF 2	Positive feedbacks from internal and external stakeholders.
PF 3	Generally, well implementation of Good Agricultural Practices (GAP).

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity																		
NCR Ref #	2151317-202201-N1	Date Issued	06/01/2022															
Due Date	20/07/2022	Date of nonconformity Closure	20/07/2022															
Clause & Category (Critical / Minor)	3.3.3 – Minor																	
Statement of Nonconformity:	The action taken after obtaining the results of water sampling to measure and monitor the impact of estate’s water quality was not effectively demonstrated.																	
Requirement Reference:	Records of monitoring and any actions taken are maintained and available.																	
Objective Evidence:	<p>Based on SOP, Water Sampling and Analysis [SMP-GPB-15, rev. 1, dated 12/11/2014], river or stream water sampling shall be carried out every 6 months (January and July). For the year 2021, there was only one water analysis carried out i.e. in March 2021 [Certificate of analysis (COA) ref. no. 03J0960, lab. No WAGPWM- 0001/21 dated 6/4/21]. Based on the results, significant difference of parameter readings was detected as follows:</p> <table border="1" data-bbox="507 1025 1241 1249"> <thead> <tr> <th>Parameter</th> <th>Inlet</th> <th>Outlet</th> </tr> </thead> <tbody> <tr> <td>BOD</td> <td>18</td> <td>46</td> </tr> <tr> <td>COD</td> <td>136</td> <td>346</td> </tr> <tr> <td>Phosphate</td> <td>2.1</td> <td>18.2</td> </tr> <tr> <td>AN</td> <td>2.6</td> <td>14.4</td> </tr> </tbody> </table> <p>However, there was no follow ups conducted to measure and monitor the overall impact. This is not in line with the Water Sampling and Analysis procedure (SMPGPB- 15, rev. 01, dated 12/11/2014) Clause 1.0 Objective, which reads, “Water sampling is important to measure and monitor the overall impact of estate and mill operations and its management on water quality”.</p>			Parameter	Inlet	Outlet	BOD	18	46	COD	136	346	Phosphate	2.1	18.2	AN	2.6	14.4
Parameter	Inlet	Outlet																
BOD	18	46																
COD	136	346																
Phosphate	2.1	18.2																
AN	2.6	14.4																
Corrections:	<p>Sample for the water analysis had been submitted on 15th Jan 2022. Upon receiving the results, current & previous results will be analysed and action plans (if required) will be prepared.</p> <p>Provide refresher training to the new PIC.</p>																	
Root Cause Analysis:	Inadequate awareness by the new PIC on the water sampling procedure and analysis requirement (ie follow up, evaluation etc) on the overall impact of the water quality.																	
Corrective Actions:	<p>SD/estate management to provide refresher training to future new PIC on the sampling procedure as well as results analysis to ensure he is fully aware and be responsible on the water sampling/quality impact and provide action to be taken if required.</p> <p>Results on the water sampling will be monitored and evaluated by estate management should it found beyond threshold level.</p>																	
Assessment Conclusion:	The estate made an monthly water samples at 2 points in the river nearby i.e hulu & hilir water course flowing within the estate with results shown below. No major issues were noted/recorded. Analysis made by GPRC.																	

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	Parameter	unit	STD	Inlet P05	Outlet P05
	Date			04/2/22	04/2/22
1	PH	-	5.5-9.0	6.90	6.80
2	BOD	mg/L	50	127.50	136.50
3	COD	mg/L	200	68.75	64.84
4	DO	mg/L	-	6	8
5	Phosphorus	mg/L	10	0.04	0.04
6	A Nitrogen	mg/L	20	7.0	7.3
	S Solids	Mg/L	100	220	278

Results concluding no significant differences and are within limits for all parameters. The estate however made investigation on the marginal increase in BOD on 15/02/2022. Site visit was made to the sampling points inlet identifying possible root cause. The estate decided to follow up with the neighbouring mill Solid Orient Palm Oil Mill. This being agreed during a meeting dated 15/02/2022 attended by 3 members. Sampling is made 2x/year. There will be further analysis of the issues as it involved continued monitoring of water quality.

No reoccurrence of non-conformity. The CAP is effectively implemented. Thus, the minor NC is effectively closed on 20/07/2022.

Opportunity for Improvement	
OFI#	Description
OFI 1	OFI Statement: N/A Verification / Follow-up actions: N/A

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1502868-201707-M1	Major	5.1.1	13/07/2017	Closed on 24/07/2017
1652689-201806-M1	Major	2.1.1	26/07/2018	Closed on 06/09/2018
1652689-201806-M2	Major	6.5.2	26/07/2018	Closed on 06/09/2018
1652689-201806-N1	Minor	5.2.4	26/07/2018	Closed on 25/07/2019
1652689-201806-N2	Minor	5.4.1	26/07/2018	Closed on 25/07/2019
1933881-202007-M1	Critical	2.1.1	15/07/2020	Closed on 06/09/2020
1933881-202007-M2	Critical	6.7.3	15/07/2020	Closed on 06/09/2020

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1933881-202007-M3	Critical	4.1.1	15/07/2020	Closed on 06/09/2020
1933881-202007-M4	Critical	6.2.3	15/07/2020	Closed on 06/09/2020
1933881-202007-N1	Minor	7.12.7	15/07/2020	Closed on 12/07/2021
1933881-202007-N2	Minor	3.5.1	15/07/2020	Closed on 12/07/2021
2151317-202201-N1	Minor	3.3.3	06/01/2022	Closed on 20/07/2022
2226313-202207-M1	Critical	6.2.1	20/07/2022	Closed on 05/09/2022
2226313-202207-M2	Critical	7.2.6	20/07/2022	Closed on 05/09/2022

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

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Governmental Department	Mohamad Nizam Ahmad, JTK Sg. Petani	Face to face interview
Governmental Department	Paramesivan A/L Krishnan, SJK(T) Bukit Sembilan	Face to face interview
Neighbouring Estate	Suresh A/L Gopal, Ladang Kok Seng	Face to face interview
Local communities	Musa b. Ismail, Kg. Kuala Bakong	Face to face interview
FFB Buyer	Palm Oil Mill (Production Engineering Solid Orient Holdings Sdn. Bhd.)	Face to face interview
NUPW	Mandore	Face to face interview
Gender committee	Office Clerk	Face to face interview
Workers Representative	1. Mandore 2. Harvester 3. General workers	Face to face interview

Stakeholders comment	
1	<p>Feedbacks: JTK Sungai Petani</p> <p>JTK has conducted inspection at Genting Bukit Sembilan Estate housing area with no negative comment received during interview. Any construction of workers housing shall obtain approval from JTK. No other issues raised.</p> <p>The management noted with the respond and will try to improve in the future.</p> <p>Audit Team verification and response: No further action needed</p>
2	<p>Feedbacks: Palm Oil Mill (Production Engineering Solid Orient Holdings Sdn. Bhd.)</p> <p>Genting Bukit Sembilan Estate is supplying Fresh Fruit Bunch (FFB) to the Mill. However, most of the FFB was received from smallholders. Mill representatives hopes Genting Bukit Sembilan can supply more FFB in the future. No other issue raised.</p> <p>The management noted with the respond and will try to improve in the future.</p> <p>Audit Team verification and response: No further action needed</p>
3	<p>Feedbacks: SJK(T) Ladang Bukit Sembilan</p> <p>School representatives appreciate on the contribution and support given by the estate management. No other issue raised</p> <p>The management noted with the respond and will try to improve in the future.</p> <p>Audit Team verification and response: No further action needed</p>
4	<p>Feedbacks: Neighbouring Estate (Ladang Kok Seng)</p> <p>No issues related to boundary or estates operation. Neighbouring estate representatives has good relationship with Genting Bukit Sembilan Estate. No other issue raised.</p> <p>The management noted with the respond and will try to improve in the future.</p> <p>Audit Team verification and response: No further action needed</p>
5	<p>Feedbacks: Village Representatives (Kg. Kuala Bakang)</p> <p>No boundary or land issues so far between estate and nearby villages. Estate has maintained the boundary marking and road to the nearby villages including allowing villagers to use estate road to their lands. No other issues raised.</p> <p>The management noted with the respond and will try to improve in the future.</p> <p>Audit Team verification and response: No further action needed</p>

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6	<p>Feedbacks: Workers Representative</p> <p>Sample of local and foreign workers has been interviewed. As per interview, there is issues has been raised where policy and procedure has been communicated to all workers. Salary payment is in line with local regulations. All workers interviewed satisfied with accommodation provided by the company. No other issues raised.</p> <p>The management noted with the respond and will try to improve in the future.</p>
	<p>Audit Team verification and response: No further action needed</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
N/A	N/A	N/A	N/A	N/A	N/A
The estate has been established since 1980s and had undergone first replanting cycle.					



Previous land owner / user comment	
	Feedbacks: N/A
	Audit Team verification and response: N/A

3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Genting Bukit Sembilan Estate has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Genting Bukit Sembilan Estate is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Muhammad Fadzli b. Masran	Name: Arunan Kandasamy
Company Name: BSI Services Malaysia Sdn. Bhd.	Company Name: Genting Plantations Berhad
Title: Client Manager	Title: Senior Vice President – Plantation (Malaysia)
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 12/09/2022	Date: 19/09/2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance
Principle 1: Behave ethically and transparently		
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p> <p>Genting Bukit Sembilan Estate (GBSE) adopted Genting Plantations Berhad’s established Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 23/02/2018 for the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties. Meeting shall be carried out at least six monthly and annually for internal and external stakeholders. The topics to be discussed such as complaint & grievances, environmental and biodiversity concerns, social issues, and suggestions for improvement.</p> <ul style="list-style-type: none"> - Company annual report - Group policies - Reports related to environment such as EIA, EAI - RSPO external audit reports - Pollution prevention plan - Continuous improvement plan - Complaints and grievances book and its procedure - Negotiation and compensation procedure - Sexual harassment procedure <p>GBSE has issued the list of documents that could be requested by the stakeholders to all the relevant stakeholders on 04/01/2021.</p>	Complied

		<p>The stakeholders are required to register in Enquiry Register Book prior to access to the documents. The list of documents not limited to:</p> <ul style="list-style-type: none"> - Land title - Policies - Reports – EAI, SIA, HCV and audit reports - Management plans - Procedures 	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>All relevant public information available in Bahasa Malaysia and English. Information is accessible to the stakeholders upon request from the estate or other operating units or access via website: https://www.gentingplantations.com/sustainability/. External stakeholders too were notified through email and/or letter on the list of publicly available documents. There was no information requested by both internal and external stakeholders in GBSE since last audit.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>No requests for information received from both internal and external stakeholders in GBSE since last audit.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Bukit Sembilan Estate (GBSE) adopted Genting Plantations Berhad’s established Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 23/02/2018 for the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties.</p> <p>Estate Manager has been appointed as management representative for RSPO, MSPO & ISCC related matters. Appointment letter dated 01/02/2021 was sighted approved by Senior Manager – Operations (WM).</p>	Complied

		<p>The stakeholder consultation was conducted from 23/05/2022 until 27/05/2022 by Sustainability Department, Genting HQ. Stakeholder meeting was attended by Imam Masjid Al-Huda Padang Geh, Kampung Padang Geh, Teacher from SJK(T) Ladang Bukit Sembilan, Cattle owner representative, Head of Village (Kampung Baru Bukit Sembilan), food stall owner, Clinic representative, BOMBA representative, smallholder, Penghulu Mukim, SJK(T) Paya Kamunting, temple representative, Kampung Hutan Terabak representative, EFB & FFB Contractor. Issues raised during the stakeholder meeting was updated in the Social Management & Monitoring Plan.</p> <p>Training on Complaints & Grievances, Request & Responses, Negotiation and Compensations, FPIC as per procedure was conducted to internal stakeholders on 09/06/2022.</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>List of Stakeholders was updated in May 2022 where internal and external stakeholders were included in the list. Stakeholders with their contact details were clearly stated in the list such as local communities, government authorities, neighbouring smallholders, schools, workers' representatives, contractors and suppliers were included</p>	Complied
<p>Criterion 1.2: 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>GBSE implemented Genting Plantations Berhad's established Code of Conduct and Ethics for Employees and Directors of Genting Plantations Berhad dated 01/06/2020. This Code sets out the principles to guide standards of behaviour and business conduct when Employees deal with third party. Duties of good faith, diligence and integrity were explained in the Code. The code of conduct is operated in conjunction with Whistle-blower policy revised on 01/06/2020 and Anti-Bribery & Corruption System Policy dated 01/06/2020.</p>	Complied

1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>System to monitor compliance includes the internal audit for RSPO requirements that conducted annually to ensure the implementation of the policy and overall ethical business practices are implemented. Latest internal audit for GBSE was conducted on 28/06/2022 – 01/07/2022 by the Headquarters. Internal audit has identified one (1) OFI and documented in the internal report.</p> <p>For external stakeholders among vendors, Third Party Due Diligence Review was carried out by the Estate Manager on 15/03/2021 to the contractors engaged by the estate. Seen the records of Third Party Due Diligence Form.</p>	Complied																								
<p>Principle 2: Operate legally and respect rights</p>																											
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>																											
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>The estate continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and Sustainability Dept. The CU had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were;</p> <table border="1" data-bbox="1151 1011 1924 1378"> <thead> <tr> <th></th> <th>Permit/License</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MPOB License: license no: 508758102000</td> <td>31/05/23</td> </tr> <tr> <td>2</td> <td>MPOB License: license no: 508759002000</td> <td>31/05/23</td> </tr> <tr> <td>3</td> <td>Hospital Dressers Certificate ref Q 1693</td> <td>-</td> </tr> <tr> <td>4</td> <td>DOSH Air Compressor KKD PMT 4993</td> <td>11/07/23</td> </tr> <tr> <td>5</td> <td>DOSH Air Compressor KKD PMT 4621</td> <td>14/09/23</td> </tr> <tr> <td>6</td> <td>KPDNHEP - diesel storage 5500L</td> <td>13/10/22</td> </tr> <tr> <td>7</td> <td>KPDNHEP - diesel storage 200L ref K0981</td> <td>02/03/23</td> </tr> </tbody> </table>		Permit/License	Validity	1	MPOB License: license no: 508758102000	31/05/23	2	MPOB License: license no: 508759002000	31/05/23	3	Hospital Dressers Certificate ref Q 1693	-	4	DOSH Air Compressor KKD PMT 4993	11/07/23	5	DOSH Air Compressor KKD PMT 4621	14/09/23	6	KPDNHEP - diesel storage 5500L	13/10/22	7	KPDNHEP - diesel storage 200L ref K0981	02/03/23	Complied
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		8	Labour quarters CF ref PCF 102002012	Eff 11/9/12	
		9	W/bridge Perakuan Pen Timbang/Sukat" ref 16051	11/08/22	
		10	W/bridge Perakuan Pen Timbang/Sukat" ref 06848	14/02/23	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>The Legal Requirements Register (LRR) covers all the necessary regulatory requirements. The LRR for was reviewed annually. The list of applicable legal and other requirements was made available during the assessment and complied in the Sustainability Management Procedure Manual SMP-GPB-22 having revision no. 6. The list comprises of the following sections</p> <ul style="list-style-type: none"> a) Environment / Safety & Health / Social b) Best practices & other requirements c) International Standards Requirement <p>Among others the identified applicable laws and regulations relevant to its operations included the;</p> <ul style="list-style-type: none"> a) Environmental Quality Act 1974 and its Regulations, b) Factories and Machinery Act 1967 and its Regulations, c) Occupational Safety and Health Act 1994 and its Regulations, d) Pesticides Act, 1974, e) Worker’s Minimum Standards Housing & Amenities Act, 1990. f) Wildlife conservation Act 2010 g) Malaysian Palm Oil Board 1998 h) Holiday Act 1951 i) Land Ordinance (Amended Ordinance) j) Forest Enactment 1968 (Sabah No 2 of 1968) k) Native Courts Ordinance 1992 l) Passport Act 1966 / Workers Union Act 1959 			Complied

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		<p>m) Estate Hospital Assistants (Registration) Act 1965 n) Petroleum (safety Measures) Act 1984 o) Fire Services Act 1984 / p) Sales Tax Act 1972 – Sabah No 9 of 1972. q) Uniform Building By Laws 1986 r) Weights And Measures Act 1972 (Act 71) (Amendment 1981) s) Minimum Wages Order 2018 t) Drainage and Irrigation Ordinance 1956 u) Sabah water resources enactment 2002 v) EIA Order 2005 / Wildlife Conservation Enactment 1997 w) Employment Insurance Scheme Act 2017</p> <p>The latest legal register update by GSQM is listed below;</p> <table border="1" data-bbox="1144 887 1928 1182"> <thead> <tr> <th></th> <th>Rev date</th> <th>Title</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>05/07/22</td> <td>Fire Services Act 1988</td> <td>Revision</td> </tr> <tr> <td>2</td> <td>05/07/22</td> <td>Arms Act 1960</td> <td>Revision</td> </tr> <tr> <td>3</td> <td>27/05/22</td> <td>Employment Amendment Act 2022</td> <td>Revision</td> </tr> <tr> <td>4</td> <td>27/05/22</td> <td>Akta Levi Keuntungan Luar Biasa</td> <td>Revision</td> </tr> <tr> <td>5</td> <td>27/05/22</td> <td>Min Wage Order 2022</td> <td>Revision</td> </tr> </tbody> </table>		Rev date	Title	Remarks	1	05/07/22	Fire Services Act 1988	Revision	2	05/07/22	Arms Act 1960	Revision	3	27/05/22	Employment Amendment Act 2022	Revision	4	27/05/22	Akta Levi Keuntungan Luar Biasa	Revision	5	27/05/22	Min Wage Order 2022	Revision	
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2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>The estate has installed boundary markers/trenches/signage as sighted during the visit to the fields. This confirmed that they have visibly maintained and demarcated the boundary markers via installing the red/white pole and signage.</p>	Complied																								

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Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.																	
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>The estate has maintained a list of all contracted parties and documented in List of Stakeholder as parts of their stakeholders includes internal such as;</p> <p>a) Employee and workers union and FW representative</p> <p>b) External stakeholders i.e</p> <ul style="list-style-type: none"> - local community heads / government agencies. - Contractors / Suppliers - NGO / Interested parties. 			Complied												
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>Genting Bukit Sembilan Estate is a single estate certification. Therefore there is no purchase of FFB.</p> <p>The following agreement as sighted and verified as below:</p> <p>a) Agreement No.: GBSE/TR/22/01/01 valid until 31/12/2022.</p> <p>b) Agreement No.: GBSE/TR/22/01/05 valid until 31/12/2022.</p> <p>Agreements are awarded for the loading /transporting FFB and LF works at both Main and Paya Kemunting Division.</p> <p>i. Both the agreements have clearly stated that the contractors need to comply with legal requirements under clause 2.3 A/B/C.</p> <p>ii. The contractors have signed a pledge on VCOBC in ensuring compliance with labor and human rights, EHS, Ethics and management practices, all applicable laws related to bribery and</p>			Complied												

		<p>integrity with the estate and complying with requirements of RSPO and SCCS.</p> <p>iii. The contractors to comply with provisions of OSHA /FMA Act 1967</p> <p>iv. The contractors and employees to be aware of existing Company Policies and procedures as listed in the agreement</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>Content of the above agreement in 2.2.2 among others specifying a specific clause mentioned the contractor shall ensure no minor (below 18 years old) are employed. This being specified under clause 2.5 D. Interviewed with the contractor and reviewed the list of contract workers confirmed that no child labour in the estate.</p>	Complied
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>This indicator is not applicable as this is a single Bukit Sembilan Estate certification.</p>	Not Applicable
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>This indicator is not applicable as this is a single Bukit Sembilan Estate certification.</p>	Not Applicable
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			

<p>3.1.1</p>	<p>(C) 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>GPB Bukit Sembilan Estate has established and implemented its commitment to a long term sustainability and financial viability through an operating expenditure /capital expenditure planning. The five years planning horizon 2022-2026 is available</p> <p>The estate possessed a budget format. Inclusive is a 5-year budget/forecast financial plan 2022-2026 allocating categories among others;</p> <ul style="list-style-type: none"> a) Crop yielding area b) Mature cost c) General charges/upkeep/collection/depreciation d) Cost/ha & cost /mt FFB e) CAPEX <p>Separately the cost of immature areas is also shown which among others comprises of the following items;</p> <ul style="list-style-type: none"> a) Labour statement / Allocation of wages / Labour benefit summary b) Yield statement oil palm c) Summary of vehicle and running schedule / Job allocation for vehicles d) Summary of workshop running schedule e) Summary of budget f) Summary of general charges g) CAPEX 	<p>Complied</p>
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		<p>The main key areas of the financial projections are as follows. Certain figures were excluded for reason of confidentiality.</p> <table border="1" data-bbox="1146 451 1883 695"> <thead> <tr> <th>Estates</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Mature Ha</td> <td>837.75</td> <td>837.36</td> <td>823.47</td> <td>770.86</td> </tr> <tr> <td>Immature Ha</td> <td>343.39</td> <td>323.78</td> <td>357.67</td> <td>410.28</td> </tr> <tr> <td>Total Planted Ha</td> <td>1,181.14</td> <td>1181.14</td> <td>1181.14</td> <td>1,181.14</td> </tr> <tr> <td>FFB /Tons</td> <td>21,818</td> <td>21,979</td> <td>20,097</td> <td>21,798</td> </tr> <tr> <td>Yield /Ha</td> <td>24.96</td> <td>23.50</td> <td>23.52</td> <td>23.31</td> </tr> <tr> <td>RM/mt FFB</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> </tbody> </table>	Estates	2022	2023	2024	2025	Mature Ha	837.75	837.36	823.47	770.86	Immature Ha	343.39	323.78	357.67	410.28	Total Planted Ha	1,181.14	1181.14	1181.14	1,181.14	FFB /Tons	21,818	21,979	20,097	21,798	Yield /Ha	24.96	23.50	23.52	23.31	RM/mt FFB	x	x	x	x	
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<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 programs until 2026 were sighted for the estate. This program is reviewed once a year (latest being Jan 2022 and is incorporated in their annual financial budget. The replanting program until year 2026 is as follows: All figures in ha otherwise stated.</p> <table border="1" data-bbox="1131 901 1906 1002"> <thead> <tr> <th>Estate</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Bkt Sembilan</td> <td>117.58</td> <td>90.19</td> <td>116.71</td> <td>96.46</td> <td>0.00</td> </tr> </tbody> </table>	Estate	2022	2023	2024	2025	2026	Bkt Sembilan	117.58	90.19	116.71	96.46	0.00	<p>Complied</p>																							
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<p>3.1.3</p>	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -</p>	<p>The Management conducted the Management Review Meeting on annually basis combined for both Selama and Bkt Sembilan Estates. The recent meeting were conducted on on-line mode on entire region basis in view of the MCO concerns. The agenda among others discussed in the MRM were;</p> <ul style="list-style-type: none"> a) RSPO/MSPO Audit schedule and certification status b) Changes/improvement on sustainability management system / results on internal audit c) Complaints and grievances d) Enquiry register/ Compliance to legal requirements 	<p>Complied</p>																																			

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		<p>e) Stakeholder meeting/minutes f) Greenhouse gas g) Continual improvement and recommendations h) Resource training requirements i) Sustainability policies j) Supply chain and traceability</p> <table border="1" data-bbox="1144 603 1865 703"> <thead> <tr> <th></th> <th>Date</th> <th>Attendee</th> <th></th> <th>Date</th> <th>Attendee</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>07/7/2022</td> <td>7</td> <td>2</td> <td>02/7/2021</td> <td>7</td> </tr> </tbody> </table>		Date	Attendee		Date	Attendee	1	07/7/2022	7	2	02/7/2021	7	
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<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>															
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -</p>	<p>The estate has established Continuous Improvement Plan dated 22/01/2022. Among the improvement plan established as follows:</p> <ol style="list-style-type: none"> 1. To instil good health and safety culture in the community 2. Option to use organic fertiliser to maximize use of biomass waste 3. To monitor full availability of workers document 4. Campaign to switch off electricity when leaving for works 5. Management to instruct the workers quarterly/as and when necessary for spraying/ grass cutting at HCV area 	Complied												
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p>	<p>RSPO metrics template submitted was verified its data to be reflective of raw data sources from each operating units.</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>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
<p>3.3.1</p>	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>The estate operations are guided by the following manuals.</p> <ul style="list-style-type: none"> a) Genting Plantations Oil Palm Manual OPM issued on 9/11/99 updated June 2013. <ul style="list-style-type: none"> - Land preparation/nursery/planting/soil conservation/ - Pest & Disease/weeding/fertiliser application/harvesting - Managing difficult soils/crop forecast b) Sustainability Management Procedure Manual 1/8/13 revised in 7/2/19. c) OSH Manual dated 1/1/2010. d) Environmental Control Procedure – 01/9/2018 e) Store Operating Manual – 2014 f) Standard Operating Procedure Malaysia Estates rev 2 (Dec 10) rev 3 (Oct 13) g) Jobs description - 2012 <p>The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections</p> <ul style="list-style-type: none"> a) OPM No 7. Manuring of oil palm b) OPM no 13. Managing difficult soils 	<p>Complied</p>

		<p>The procedures as documented in the manuals and SOPs were disseminated to the staff/workers through morning briefings and training. The manuals are kept in the main office for references of employees particularly for the supervisory personnel. Field inspection and interviews with the workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs. The SOPs included the operation activities from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt.</p>																					
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>The estate had an established mechanism to perform checking to ensure consistent implementation of procedures</p> <table border="1" data-bbox="1167 767 1912 1383"> <thead> <tr> <th></th> <th>Areas</th> <th>Action/Activities</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1</td> <td rowspan="2">Daily</td> <td>Supervision by staff/Assist/Manager</td> </tr> <tr> <td>Report of daily activities/costings/variation</td> </tr> <tr> <td rowspan="4">2</td> <td rowspan="4">Schedule</td> <td>Quarterly ESH meeting</td> </tr> <tr> <td>Internal audits by GCAD / SHO</td> </tr> <tr> <td>Region SHO 2x/year visits</td> </tr> <tr> <td>External audit RSPO /MSPO</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">Annual</td> <td>Annual EPMC</td> </tr> <tr> <td>Medical surveillance</td> </tr> <tr> <td>4</td> <td>Regulatory visit</td> <td>MPOB / DOE / DOSH / for statutory visit machinery CF renewal and environmental issues and licenses.</td> </tr> </tbody> </table>		Areas	Action/Activities	1	Daily	Supervision by staff/Assist/Manager	Report of daily activities/costings/variation	2	Schedule	Quarterly ESH meeting	Internal audits by GCAD / SHO	Region SHO 2x/year visits	External audit RSPO /MSPO	3	Annual	Annual EPMC	Medical surveillance	4	Regulatory visit	MPOB / DOE / DOSH / for statutory visit machinery CF renewal and environmental issues and licenses.	Complied
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		<p>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 maintained are;</p> <ul style="list-style-type: none"> i. Daily production/work records for the core activities at the estates ii. field cost book / chemical consumption record iii. mature/immature field work program <ul style="list-style-type: none"> - fertilizer application, - herbicide spraying, / rat baiting , - Harvesting and collection of FFB. <p>All the above records were kept for a minimum period of 12 months. In addition the management adopted the following check and balances though visit of the following dept. /superiors</p> <ul style="list-style-type: none"> i. Agronomic advisory report and fertilizer recommendation minimum 1x/year to monitor matters relating to; <ul style="list-style-type: none"> - nutrient deficiency, fertilizer program, - pest & disease ganoderma infection, rat and RB attack, - EFB mulching program for the year etc. ii. Plantation Advisory visit producing "<i>Estate Visit Report</i>" at frequency of 2x/year performing assessment relating to; <ul style="list-style-type: none"> - land use, capital expenditure, general charges, - oil palm (mature & immature area) field condition - crop performance and cost - vehicles & equipment, amenities, - Labour and security etc. - Activities by Contractors are monitored to ensure compliance. <p>Internal audit by the Agronomy Dept. (Sustainability Unit)</p>	
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		<p>scheduled 2x/year for each unit. The exercise is to inspect and monitor compliance on ISCC/MSPO/RSPO standard requirement. Results from assessment of which are tabled and discussed during the Management Review.</p> <p>The mechanisms as established have been implemented. This is verified via the records maintained in all units daily, monthly and annually.</p>	
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available. - Minor Compliance -</p>	<p>The implementation of SOP are monitored on a daily basis by the field staffs and Assistants Managers with overall overview by the Managers. The monitoring is made via supervision and records maintenance.</p> <p>The estates among others maintained the following records.</p> <ul style="list-style-type: none"> a) Work program / Field cost books b) Bin cards, Harvesting Intervals, c) Monthly Estate Report and Account, d) Monthly Operations, monthly rainfall, e) pest and diseases monthly return, f) agrochemical monthly consumption g) Harvesting details i.e. daily inspection report – yield improvement program, h) Summary of machinery running hours i) Harvesting records detailing the number of bunches harvested j) Quantity of loose fruit collected by each harvester. k) Monthly FFB production, etc. <p>Activities carried out by contractors are being monitored via the following among others</p>	<p>Complied</p>

		<ul style="list-style-type: none"> a) The estate monitors to ensure that no contractors bring along their family members to work in the field. b) The estate ensure that the contractors are providing PPE, suitable working equipment and c) no unauthorized personnel including family members are present at site. <p>Records of follow up action, if any, are retained.</p>	
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting within Genting Bukit Sembilan Estate.</p> <p>Environmental</p> <p>There were no new planting in the estate. This is verified through the following document/facts.</p> <ul style="list-style-type: none"> a) Hectare statement compared to the previous year. b) Interviews with the management c) Field visits and verification. <p>The assessment for environmental aspect and impact has been conducted for all operations in the estate covering the main and support activities in the estate, based on the assessment findings, a management plan has been conducted and documented in Environmental Improvement and Management Plan 2022 (Pelan Pengurusan (Management Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang/Kilang) among others aimed;</p> <ul style="list-style-type: none"> a) To assess current condition based on identified potential aspects b) To verify presence of protected & conservation areas that could be significantly affected. 	<p>Complied</p>

		<p>c) To assess the social & environmental impact on the affected areas/stakeholders arising from the estate/mill activities.to reduce and control the pollution (negative impacts) and action plan to sustain the environmental impact (positive) has been developed with details in EIA assessment form ref no SP-MGR-02-F01-00 dated latest review 18/02/2022.</p> <p>d) To comply with various sustainability certification schemes The activities involved discussion with the estate management, sighting the documentation, observation on sites and surrounding, and interview with stakeholders adjacent to the conversion areas. The assessment covered the aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control. All the above documents were updated accordingly respectively in Jan 2022. These content are reviewed annually for any revision and updates.</p> <p>The Social/Environmental Management Plan (Pelan Pengurusan (Management Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang/Kilang) for 2022 produced among others includes the following;</p> <ul style="list-style-type: none"> a) Organization information b) Scope of assessment & team c) Methodology assessment timeline, approach and parameters d) SEAI matrix and findings. <p>All sites and the reports were visited and sighted respectively by the auditors in presence of the SD, Regional SHO estates.</p>	
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		<p>Social</p> <p>No new planting within GBSE. For existing operations, Social Impact Assessment (SIA) & Forced Labour Assessment Report is available. The assessment was conducted on 23-27/05/2022 for Genting Bukit Sembilan Estate by Sustainability Department. The methodology of the assessment was through consultation with stakeholders and reviewed documents. Stakeholders such as local communities, school's representative, contractors, local authorities, smallholders, and workers were involved in the assessment.</p> <p>Social Management and Monitoring Plan of Genting Bukit Sembilan Estate was reviewed and updated on 16/07/2022. Mainly, the issues highlighted was based on the SIA report 2019 as per sample issue as following:</p> <ul style="list-style-type: none"> - Issue: Road conditions to the school are not favorable and very dusty highlighted by Headmistress of SJK(T) Ladang Bukit Sembilan. - Action plan: Road maintenance programs for main road grading as per schedule and wetting the roads surrounding school during dry weather to reduce dust. 	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Environmental</p> <p>The Social/Environmental Improvement and Management Plan (Pelan Pengurusan (Management Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang/Kilang) for period 2022 is available for the CH. The plan among others incorporated the objectives, category, action, frequency, person in charge and monitoring period. Among others issues as extracted below:</p> <p>a) To ensure compliance to SOP and legal requirement regarding social (appointment of person in charge/committee to handle social matters, communication on policies/SOP on social to</p>	Complied

- relevant stakeholders, monitoring of pay and agreement of workers and contractor’s workers and to maintain housing and facilities provided to workers).
- b) To contribute to local communities development
 - c) Community and employee alert on the present pandemic Covid -19
 - d) PPE issuance and compliance for employees
 - e) Domestic waste disposal
 - f) Enhance understanding on safety guidelines in estate
 - g) Health awareness among employees.
 - h) Audiometric test awareness among employees.

The aspect and impact analysis for all the estate operations are documented on Jan 2022 and revised annually. In the comprehensive report, the study of aspect and impact are aimed to;

- a) Plan to avoid negative impact and to promote positive impacts.
- b) Reduction disposal of waste taking into consideration of social responsibilities.
- c) Plan to reduce pollution and release of GHG
- d) Development and implementations.

The aspect and impact covered the following activities/operations among others;

	Estates		Estates
	Activities		Activities
1	Poisoning VOPs/ woodies	7	Vehicle maintenance
2	Circle spraying	8	EFB application

		<table border="1" data-bbox="1160 363 1917 517"> <tr> <td>3</td> <td>Management of empty containers</td> <td>9</td> <td>Fertilizer storage /application</td> </tr> <tr> <td>4</td> <td>Rat baiting</td> <td>10</td> <td>Grass slashing</td> </tr> <tr> <td>5</td> <td>Diesel Reception</td> <td>11</td> <td>Chemicals storage</td> </tr> <tr> <td>6</td> <td>Triple rinsing</td> <td>12</td> <td>Grading of FFB</td> </tr> </table> <p>Social Social management and monitoring plans developed with participation of affected stakeholders with latest consultation was conducted from 23/05/2022 until 27/05/2022 by Sustainability Department, Genting HQ. The stakeholder consultation meeting was attended by Imam Masjid Al-Huda Padang Geh, Kampung Padang Geh, Teacher from SJK(T) Ladang Bukit Sembilan, Cattle owner representative, Head of Village (Kampung Baru Bukit Sembilan), food stall owner, Clinic representative, BOMBA representative, smallholder, Penghulu Mukim, SJK(T) Paya Kamunting, temple representative, Kampung Hutan Terabak representative, EFB & FFB Contractor. Issues raised during the stakeholder meeting was updated in the Social Management & Monitoring Plan.</p>	3	Management of empty containers	9	Fertilizer storage /application	4	Rat baiting	10	Grass slashing	5	Diesel Reception	11	Chemicals storage	6	Triple rinsing	12	Grading of FFB	
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3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>Environmental The Social/Environmental Action Plan 2022 available has information i.e issues, management plan, PIC and time frame. The input are gathered from the meeting minutes among others;</p> <ul style="list-style-type: none"> a) Gender Committee, union b) Safety Meeting, c) Complaint & Request from internal & external stakeholders d) Management meeting at estates/mill and regional level. e) Dialogue during the morning muster. f) Interview approach with employees. 	Complied																

In addition the estate has initiated the following projects for enhancement to the environmental/operations/social sections.

	Year	Section	Details
1	2023	Harvesting	Introduction mechanical cutter 100K
2	2022	Social	Upgrading workers quarter 3 years RM200K

Management and monitoring plans were implemented, reviewed and updated by each operating in a participatory through consultation with stakeholders and assistance by Sustainability Department personnel. The estate had established Environmental Continual Improvement Plan among others the following activities/operations

- a) The estate HCV area checklist to records the monitoring conducted at the HCV areas.
- b) The estate monitor the water/diesel usage on monthly basis.

Social

Social Management and Monitoring Plan was reviewed bi-annually with latest updated on 16/07/2022. Mainly, the issues highlighted was based on the SIA report 2019 as well as result of latest stakeholder consultation session as per sample issue as following:

- Issue: Road conditions to the school are not favourable and very dusty highlighted by Headmistress of SJK(T) Ladang Bukit Sembilan.
- Action plan: Road maintenance programme for main road grading as per schedule and wetting the roads surrounding school during dry weather to reduce dust.

Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>GBSE adopted Genting Plantations Berhad’s established Foreign Workers Recruitment Procedure (Doc. No.: GEN-13, Rev. 02 dated 09/11/2020) to establish control procedures on the employment of foreign workers. Recruitment, selection and termination/retirements process was clearly outlined in the procedure.</p> <p>Local Recruitment Procedure was established as well with criteria for promotion outlined in Procedure for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021).</p> <p>Procedure Manual of Manpower Recruitment and Orientation (Doc. no. PM-MR-02; Rev. 00, dated 02/01/2018) for recruitment, selection, hiring, promotion, retirement and termination and made available to the workers.</p> <p>The procedure is written in Bahasa and English language that can be easily understood by all levels of its employees. This policy is displayed at the offices and on notice boards.</p> <p>The communication of the policy and Genting SOP was conducted during Morning Muster.</p> <p>As per interview with the workers, there is evidence that they are aware about the procedure and understand process as per stated in the procedure.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>The employment of local workers was through advertisement and word of mouth. The Manager informed that they will publish the vacancy via banner displayed outside the guard house and informed head of local communities if there is any vacancy available. Besides, some of the local communities will walk-in to apply for job. Reviewed the records of employment such as employment letter, medical check-up, check registration of EPF where identification number was available.</p>	Complied

		Employment of foreign workers are managed through Human Resource Department in HQ. There was no recruitment of foreign workers since last audit.	
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The estate has conducted assessment for risk covers all main operations and support operations.</p> <p>The estate has conducted Baseline Noise Risk Assessment on 27/10/2021 by assessor with DOSH reg. no. HQ/16/PEB/00/155. Refer report no. ACL/SHM-20210103 dated 08/12/2021. As per report under section 9.0 Recommendation, the estate are required to conduct annual audiometric test for involved workers in operation Mist Blower, Vicon Spreader, Grabber Tractor and Road Grading. Latest audiometric test was conducted on 12/05/2022 by OHD with DOSH reg. no. HQ/08/DOC/00/409.</p> <p>Latest Chemical Hazard Risk Assessment was conducted on 10/03/2022 by assessor with reg. no. HQ/12/ASS/00/309. Refer report no. HQ/12/ASS/00/309-2022/001.</p> <p>Genting Plantations has established SOP for HIRARC. Refer SOP no. OMGPB- 07, rev. 0 dated 01/01/2010. The estate has conducted risk assessment for all estate activities recorded in the HIRARC reports and reviewed on annually basis. Latest review was conducted on 25/01/2022.</p>	Complied
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The estate has established the H&S plan documented in Safety and Health Management Plan 2022. The plan cover main activity areas i.e Agrochemicals on Plantations, Oil Palm Harvesting Operations, Machine Operator, FFB lorry drivers, vehicle driving/machine handling, workshop operation, usage of PPE, thorn prick and Sound Management of chemical. The estate has allocated budget for the H&S plan.</p>	Complied

		<p>Sighted the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. The estate conducted first aid kit monitoring on monthly basis. Reviewed the monitoring records dated 11/03/2022, 08/04/2022, 06/05/2022, 17/06/2022 and 01/07/2022. 2. Latest Chemical Hazard Risk Assessment was conducted on 10/03/2022 by assessor with reg. no. HQ/12/ASS/00/309. Refer report no. HQ/12/ASS/00/309-2022/001. 3. Latest audiometric test was conducted on 12/05/2022 by OHD with DOSH reg. no. HQ/08/DOC/00/409. 4. The estate continuously provided training to ensure the awareness among workers. Reviewed training records for PPE for weeders, harvesters, general workers, drivers dated 15/01/2022 	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training. - Critical (Major) compliance -</p>	<p>The estate conducted training need analysis to identify training required for the employee and documented in Training Plan. The analysis covers the Proposed Person to Attend, Designation, Intend Scope of Training, Rationale of Training Planned, Date and Trainer.</p> <p>The estate has established training program FY 2022 base on training need analysis conducted. The training program covers operation SOP, OSH training and wellness, sustainability training and awareness and Covid-19 pandemic control.</p> <p>The program involve the executive, staff/field supervisor, workers and contractors. The identified training was programmed throughout the year.</p> <p>The estate has also conducted assessment to the training attendees to assess the training efficiency.</p>	<p>Complied</p>

<p>3.7.2</p>	<p>Records of training are maintained. - Minor Compliance -</p>	<p>The estate maintain the training records for all employees and contractors. Sighted the training records as follows:</p> <ol style="list-style-type: none"> 1. Understanding of GENP Policy – Anti Bribery and Corruption/ Sustainability/ Personal Data Protection/ MSPO/ Environmental/ / Policy training dated 03, 06, 11, 17 and 18/01/2022 2. Prevention of sexual harassment at workplace dated 22/03/2022 3. Anti-bribery code of conducts and ethics training dated 15/03/2022 4. Complaints and grievances, request and response, negotiation and compensation, FPIC training dated 09/06/2022 5. HCV and RTE management plan and procedure, human – wildlife conflicts training dated 10/06/2022 6. Riparian buffer zone management training dated 10/06/2022 7. Schedule waste management, domestic waste and recyclable waste classroom training dated 10/06/2022 8. Waste management – spillage training dated 18/03/2022 9. Emergency response team FY 2022 training dated 20/01/2022 10. RTE species training dated 01/04/2022 11. Sprayers gang for mature and immature area training dated 02/03/2022 12. Firefighting training dated 24/03/2022 13. Triple rinse and puncturing of chemical container training dated 03/03/2022 14. Spraying techniques and safety aspects as well as maintenance of Inter Sprayer dated 31/05/2022 	<p>Complied</p>
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		<p>15. Noise at workplace training dated 17/08/2021</p> <p>16. Bufferzone to manuring and spraying gang training dated 04/01/2022</p> <p>17. SOP for spraying training dated 20/01/2022</p> <p>18. First aid training dated 30/03/2022</p> <p>19. SOP for harvesting training dated 23/03/2022</p> <p>20. PPE for weeders, harvesters, general workers, drivers training dated 15/01/2022</p>	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
3.8.2	Mass Balance Module	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable

	A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.		
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. 	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable

	d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.		
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil</p>	Not Applicable for Genting Bukit Sembilan Estate	Non-compliance

	<p>palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 		
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. 	<p>Not Applicable for Genting Bukit Sembilan Estate</p>	<p>Not Applicable</p>

	<ul style="list-style-type: none"> c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 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. 		
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.	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. 	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable

	<p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>		
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	Not Applicable for Genting Bukit Sembilan Estate	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>	Not Applicable for Genting Bukit Sembilan Estate	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>	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable

	ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.		
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable

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.	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable

	products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.		
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Not Applicable for Genting Bukit Sembilan Estate	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.	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Not Applicable for Genting Bukit Sembilan Estate	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.	Not Applicable for Genting Bukit Sembilan Estate	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.	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to	Not Applicable for Genting Bukit Sembilan Estate	Not Applicable

	<p>ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
<p>MODULE B – MASS BALANCE SPECIFIC RULES</p>			
<p>Minimum Mass Balance content</p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>Not Applicable for Genting Bukit Sembilan Estate</p>	<p>Not Applicable</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>Not Applicable for Genting Bukit Sembilan Estate</p>	<p>Not Applicable</p>
<p>Labelling and trademark (MB)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. 	<p>Not Applicable for Genting Bukit Sembilan Estate</p>	<p>Not Applicable</p>

	<ul style="list-style-type: none"> Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
<p>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces. - Critical (Major) compliance -</p>	<p>GBSE adopted Genting Plantations Berhad's established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company respect human rights and support international human rights law. Briefing of the policy was conducted regularly to the workers during daily morning muster.</p>	<p>Complied</p>
<p>4.1.2</p>	<p>The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -</p>	<p>Based on directives and policies by group company Genting Plantations Berhad, GBSE ensured all personnel are treated fairly and protected from any form of discrimination that would constitute a violation of their human rights. Interview conducted with the workers confirmed that the management does not instigate violence or use any form of harassment to them in estate operations.</p>	<p>Complied</p>
<p>Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
<p>4.2.1</p>	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-</p>	<p>GBSE adopted Genting Plantations Berhad's established Complaints and Grievances procedure (Doc. No.: SMP-GPB-19, Rev 4, dated 01/03/2020) to provide guidelines on handling complaints & grievances involved internal and external stakeholders.</p>	<p>Complied</p>

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	<p>blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Furthermore, there is a Whistle-Blower policy dated 01/06/2020 that provides a system for anonymity grievance. All the written confidential complaints are maintained and shall be dealt by Manager. The timeframe for the action to be taken depends on seriousness of the complaints or grievance. The accepted timeframe to acknowledge and respond to the complaint or grievances is within 1 month upon receipt.</p> <p>Besides, Social Policy dated 14/09/2020 was established where they prohibit retaliation against human rights defenders who submit complaints in good faith in line with their existing Whistle-blower policy which provide a grievances channel for human rights defenders to report their concerns freely and without fear of reprisal or intimidation.</p>	
<p>4.2.2</p>	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The Complaints and Grievances procedure (Doc. No.: SMP-GPB-19, Rev 4, dated 01/03/2020) in place was fully understood by affected parties based on consultation made with workers and external stakeholders during the assessment.</p>	<p>Complied</p>
<p>4.2.3</p>	<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>There was a training on Complaints & Grievances, Request & Responses, Negotiation and Compensations, FPIC as per procedure conducted by estate management to the external stakeholders on 09/06/2022 while briefing on Complaints and Grievances Procedure was conducted to internal stakeholders on 17/03/2022.</p> <p>Based on consultation with stakeholders and the records of estate's Complaints/Grievances and Enquiry Record Book that record any complaint or grievance received, the agreed timeframe and outcome is available as per sample as following:</p> <ul style="list-style-type: none"> Complainants: Kampung Bukit 9, Description: drain clogged and causing water passing through residential area, dated 05/07/2022. Action taken: Backhoe was sent to clean the drainage on 06/-7/2022 	<p>Complied</p>

		<ul style="list-style-type: none"> Complaint from: Kampung Kuala Bakong, Description: Request to open landfill at the estate/village boundary area. Action taken: landfill has been prepared on 06/07/2022. Complaint received from workers due to house defects, Unit No: E7, at Genting Bukit Sembilan Estate, date of complaint 03/01/2022 (Location: Room No. 1, House No E7), Detail of defects: light bulbs and plug damage, repair done on 07/01/2022 	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	As mentioned in the procedure for Complaints and Grievances (Doc. No.: SMP-GPB-19, Rev 4, dated 01/03/2020), under Clause 2.1.10, the complainant shall be given the option of access to independent legal and technical advice, to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	Complied
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>GBSE has carried out corporate social responsibilities to the local communities such as provide job opportunities to local people. Recent local communities' contribution sighted including drainage cleaning at Bukit Sembilan villages and landfill preparation for Kampung Kuala Bakong.</p> <p>Internally, GBSE provided rice and chicken to all workers during festive season such as Hari Raya Aidilfitri, Deepavali celebrations and also conducted annual estate kenduri/feast.</p>	Complied
<p>Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the</p>	<p>GBSE consist of 2 divisions which is main division and Paya Kemuntng Division. Main division has 6 land titles with total area of 792.433 Ha and Paya Kamunting Division has 4 land titles with total area of 435.7045 Ha.</p>	Complied

	<p>history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Sighted the land titles that shown the legal ownership of the company as per sample as following:</p> <p>Main Division</p> <ul style="list-style-type: none"> • Title No: GRN 36096, Lot No: 52, District: Baling, Area: 564.9902 Ha • Title No: GRN 35798, Lot No: 54, District: Baling, Area: 118.7802 Ha • Title No: GM00046, Lot No: 339, District: Baling, Area: 0.0588 Ha <p>Paya Kamunting Division</p> <ul style="list-style-type: none"> • Title No: GRN 197658, Lot No: 3221, District: Kubang Pasu, Area: 15.3400 Ha • Title No: GRN 197660, Lot No: 2452, District: Kubang Pasu, Area: 76.9700 Ha 	
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>There is no land dispute in the GBSE since last audit. The land belongs to Genting Plantations Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.</p>	Complied
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>There is no land dispute in the GBSE since last audit. The land belongs to Genting Plantations Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.</p>	Complied
4.4.2b	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no land dispute in the GBSE since last audit. The land belongs to Genting Plantations Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.</p>	Complied

4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	There is no land dispute in the GBSE since last audit. The land belongs to Genting Plantations Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	Estate boundary map and field map available indicated that the legal boundary for estate visited was clearly demarcated with legal boundary peg. Seen the photo evident of the legal boundary peg demarcate the boundary. Boundary map/ GPS map with scale of 1:15,500 was sighted where location of neighbouring communities was demarcated in the map.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	There is no land dispute in the GBSE since last audit. The land belongs to Genting Plantations Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	There is no land dispute in the GBSE since last audit. The land belongs to Genting Plantations Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There is no land dispute in the GBSE since last audit. The land belongs to Genting Plantations Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			

4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the stakeholder consultation and SIA report, there is neither a land dispute nor customary land present in GBSE. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers.</p>	Complied
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>The plantation was established since 1980s and there was no new planting in GBSE since last audit. Therefore, FPIC should not be applicable.</p> <p>In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>The plantation was established since 1980s and there was no new planting in GBSE since last audit. Therefore, FPIC should not be applicable.</p> <p>In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples,</p>	<p>The plantation was established since 1980s and there was no new planting in GBSE since last audit. Therefore, FPIC should not be applicable.</p>	Complied

	<p>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>In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</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>The plantation was established since 1980s and there was no new planting in GBSE since last audit. Therefore, FPIC should not be applicable.</p> <p>In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>The plantation was established since 1980s and there was no new planting in GBSE since last audit. Therefore, FPIC should not be applicable.</p> <p>In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p>	Complied

4.5.7	<p>New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.</p> <p>- Minor compliance -</p>	<p>The plantation was established since 1980s and there was no new planting in GBSE since last audit. Therefore, FPIC should not be applicable.</p> <p>In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>The plantation was established since 1980s and there was no new planting in GBSE since last audit. Therefore, FPIC should not be applicable.</p> <p>In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p>	Complied
<p>Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the</p>	Complied

		<p>communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p> <p>Based on the stakeholder consultation and SIA report, there is neither a land dispute nor customary land present in GBSE. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers.</p>	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p> <p>Based on the stakeholder consultation and SIA report, there is neither a land dispute nor customary land present in GBSE. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p> <p>Based on the stakeholder consultation and SIA report, there is neither a land dispute nor customary land present in GBSE. The</p>	Complied

		estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers.	
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 -	In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation. Based on the stakeholder consultation and SIA report, there is neither a land dispute nor customary land present in GBSE. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation. Based on the stakeholder consultation and SIA report, there is neither a land dispute nor customary land present in GBSE. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers.	Complied

4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p> <p>Based on the stakeholder consultation and SIA report, there is neither a land dispute nor customary land present in GBSE. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p> <p>Based on the stakeholder consultation and SIA report, there is neither a land dispute nor customary land present in GBSE. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers.</p>	Complied
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition</p>	<p>In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-</p>	Complied

	<p>is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p> <p>Based on the stakeholder consultation and SIA report, there is neither a land dispute nor customary land present in GBSE. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers.</p>	
<p>4.8.2</p>	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p> <p>Based on the stakeholder consultation and SIA report, there is neither a land dispute nor customary land present in GBSE. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers.</p>	<p>Complied</p>
<p>4.8.3</p>	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	<p>In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p>	<p>Complied</p>

		Based on the stakeholder consultation and SIA report, there is neither a land dispute nor customary land present in GBSE. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers.	
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 -	In case of land disputes, the process will be handled as per Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation. Based on the stakeholder consultation and SIA report, there is neither a land dispute nor customary land present in GBSE. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	This indicator is not applicable as this is a single Bukit Sembilan Estate certification.	Not Applicable
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	This indicator is not applicable as this is a single Bukit Sembilan Estate certification.	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.	This indicator is not applicable as this is a single Bukit Sembilan Estate certification.	Not Applicable

	- Critical (Major) compliance -		
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	This indicator is not applicable as this is a single Bukit Sembilan Estate certification.	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	This indicator is not applicable as this is a single Bukit Sembilan Estate certification.	Not Applicable
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	This indicator is not applicable as this is a single Bukit Sembilan Estate certification.	Not Applicable
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	This indicator is not applicable as this is a single Bukit Sembilan Estate certification.	Not Applicable
5.1.8	<p>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.</p> <p>- Minor compliance -</p>	This indicator is not applicable as this is a single Bukit Sembilan Estate certification.	Not Applicable
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	This indicator is not applicable as this is a single Bukit Sembilan Estate certification.	Not Applicable

Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	This indicator is not applicable as this is a single Bukit Sembilan Estate certification.	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	This indicator is not applicable as this is a single Bukit Sembilan Estate certification.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	This indicator is not applicable as this is a single Bukit Sembilan Estate certification.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	This indicator is not applicable as this is a single Bukit Sembilan Estate certification.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	This indicator is not applicable as this is a single Bukit Sembilan Estate certification.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic	GBSE adopted Genting Plantations Berhad's established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company shall not discriminate in terms of hiring,	Complied

	origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	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.	
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance -	GBSE adopted Genting Plantations Berhad's established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company shall 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. Based on records of employment verified and consultation made with workers, it was confirmed that no discrimination practiced by the estate management.	Complied
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	Based on records of employment verified and consultation made with workers, it was confirmed that no discrimination practiced by the estate management. GBSE has demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	Based on the Procedure for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021), Clause 6.8.5, no pregnancy testing will be carried out as a condition of hiring or for continued employment. Interview conducted with female workers confirmed that pregnancy testing is not a criterion for pre-employment. A premedical check-up was conducted by Hospital Assistant to check whether the worker is fit for work or not.	Complied

6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Gender Committee was established in GBSE with latest meeting was conducted on 9/6/2022. The frequency of the meeting is at least once every 6 months as per guideline of Penubuhan Jawatankuasa Wanita dan Kanak-kanak developed by Sustainability Department dated 2010. Briefing of the sexual harassment policy was conducted during the meeting as well.</p> <p>The Sustainability Department has carried out Gender Risk Assessment & Quick Scan assessment on 18/05/2021. Opportunities and improvement for women was assessed where women have equal access to training and career development.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Evidence of equal pay for the same work scope sighted for both male and female workers as per samples as following:</p> <ul style="list-style-type: none"> - Emp. ID # 02510; M; Field Worker; Date joined: 15/6/2017 - Emp. ID # 26727; M; Harvester; Date joined: 11/11/1999 - Emp. ID # 26700; M; Driver; Date joined: 28/5/2015 - Emp. ID # 02545; M; Harvester; Date joined: 28/3/2018 - Emp. ID # 26716; M; Harvester; Date joined: 26/4/2019 - Emp. ID # 02472; M; Harvester; Date joined: 5/10/2011 - Emp. ID # 26780; F; Weeder; Date joined: 1/3/2021 - Emp. ID # 02425; M; Harvester; Date joined: 2/2/2022 - Emp. ID # 26770; M; Parol; Date joined: 5/7/2021 - Emp. ID # 26782; M; Parol; Date joined: 2/5/2022 - Emp. ID # 22363; F; Weeder; Date joined: 2/1/2002 	Complied
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in</p>	<p>There were employment contracts for staffs and workers. Pay and conditions are documented and achieved the Minimum Wage Order</p>	Non-compliance

	<p>national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>2022. Sample of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Employment Act 1955 which have been signed by the worker. Records of pay documents including payslips, checkroll and Socso 8A form verified for month of Dec 2021, March 2022 & June 2022 for sample workers as in indicator 6.1.6 above. However it was found that the workers overtime for sampled workers for:</p> <ol style="list-style-type: none"> 1. Employee ID No: 02472, 2. Employee ID No: 02510, 3. Employee ID No: 26700, 4. Employee ID No: 02545 <p>for the month of March 2022 and June 2022 was not documented in the pay slip. However, it was included and paid as the piece rate payment.</p> <p>Hence, a Critical NC has been raised on the matter.</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Sample of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Employment Act 1955 which have been signed by the worker. Records of pay documents including payslips, checkroll and Socso 8A form verified for month of Dec 2021, March 2022 & June 2022 for sample workers as in indicator 6.1.6 above give accurate information on compensation for all work performed.</p>	Complied
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Sample of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Employment Act 1955 which have been signed by the worker. Records of pay documents including payslips, checkroll and Socso 8A form verified for month of Dec 2021, March 2022 & June 2022 for sample workers as in indicator 6.1.6 above give the evidence of</p>	Complied

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		legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The estate management has provided free housing facilities to all the workers. Basic amenities such as water and electricity was supplied by government and the company bear all the cost of electricity and water bill for the workers. Interviewed with workers confirmed that water and electricity was provided free of charge.</p> <p>Clinic has been established in estate area with hospital assistant.</p> <p>Houses are equipped with 3 bedrooms and a bathroom. As per site visit sighted that each family has been provided one house while for single workers, shared house of maximum of 2 person per room was provided.</p> <p>Linesite inspection was carried out on monthly basis by Field Supervisor and twice a month by VMO. The last inspection was conducted on 21/07/2022 by VMO and records of the inspection were kept available.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>The estate was located nearby to the town and the workers can access to town by own/ public transport. Besides, the workers are allowed to do planting/ farming of vegetable at the housing area.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: 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,</p>	<p>The payment of wages is based on the latest minimum wages stipulated under the Minimum Wages Order 2022, which is 57.69 per day, or RM1,500 per month effective from May 2022 onwards. Payslips for June 2022 sighted for sampled workers (refer indicator 6.2.2) confirmed the payment of the minimum wages.</p> <p>Notwithstanding a prevailing wage assessment conducted for GBSE Certification Unit which resulting in the average take home pay as prevailing wages of RM 1,907.92.</p>	Complied

<p>Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment 		
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	<ul style="list-style-type: none"> The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>There was no casual worker employed by the estate. All the workers are permanent workers. Contractors only conducted works such as FFB transporting and machinery hiring.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>GBSE adopted Genting Plantations Berhad’s established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where the company respect the rights of the workers to join or form legal trade unions of their own choosing and to bargain collectively. Briefing of the policy was conducted to the workers regularly during daily morning muster. Interview conducted with sample workers and workers’ representatives confirmed that they are free to become members of National Union of Plantation Workers (NUPW).</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Meeting with NUPW sighted at Genting Bukit Sembilan Estate on 23/02/2022 as per letter Ref No: NUPW/KD/E12(215)/02/22 dated 10/02/2022. There was no issue raised during the meeting as verified in the meeting minutes.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p>	<p>Interview conducted with sample workers and workers’ representatives confirmed that they are freely elected as representatives among GBSE members of National Union of Plantation Workers (NUPW) through voting.</p>	Complied

	- Minor compliance -		
Criterion 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	GBSE adopted Genting Plantations Berhad's established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where the company shall not use any child labour. Children's right is respected.	Complied
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -	As per Procedures for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021), Clause 6.8.4, the estate and mill shall verify identification card, passport and work permit before employ workers to ensure no child labour in the company. The contractor shall also provide full details of the workers such as identification card, passport, work permit for age verification by the management. Consultation with workers and verification of the workers master list with detail particulars confirmed that no child labour employed in GBSE.	Complied
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	Consultation with workers and verification of the workers master list with detail particulars confirmed that no young persons or workers below age of 18 years old employed in GBSE.	Complied
6.4.4	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. - Minor compliance -	GBSE adopted Genting Plantations Berhad's established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where the company shall not use any child labour. The policy was displayed at the notice board outside the office. The contractors have signed on the contract agreement where under Clause 2.5 D (i), the contractor shall ensure no minors (below 18 years old) are employed. Briefing of the policy was conducted on 26/04/2021 during stakeholder meeting. Consultation with the contractor confirmed that no child labour was employed.	Complied

Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>GBSE adopted Genting Plantations Berhad’s established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited. Reproductive rights are protected.</p> <p>Besides, Sexual Harassment Policy was developed on 03/08/2009 to strive for a harassment-free environment and avoid behaviour that may create an atmosphere of hostility and intimidation of any kind at workplace. Briefing of the policy was conducted to the workers during morning muster. Procedure on Prevention and Eradication of Sexual Harassment at the Workplace was established (Doc. No.: SMP-GPB-20, Rev. 0 dated 11/10/2013). Process of handling sexual harassment complaint was outlined in the procedure.</p> <p>Training on Prevention of Sexual Harassment at Workplace was conducted on 22/03/2022 and 25/05/2022</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>GBSE adopted Genting Plantations Berhad’s established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where reproductive rights of all especially women are protected.</p> <p>Communication of the policy was conducted to the workers during morning muster latest on 22/03/2022 and 25/05/2022</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Checklist for assessment of new mothers needs available and been discussed during gender committee meeting for any required. No new mothers in GBSE since last audit.</p>	Complied

6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>GBSE adopted Genting Plantations Berhad's established Procedure on Prevention and Eradication of Sexual Harassment at the Workplace (Doc. No.: SMP-GPB-20, Rev. 0 dated 11/10/2013) to the grievance mechanism was established. Furthermore, there is a Whistle-Blower policy dated 01/06/2020 which respects anonymity and protects complainants where requested. A Grievance/ Complaint Form for Sexual Harassment was developed to record if there is any complaint. Interview conducted with the female workers confirmed that they are aware of the grievance mechanism and no issue reported.</p>	Complied
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Visit and interview conducted on site with workers mainly among foreigners confirmed that no retention of identity documents except for administration purposes including legalisation and renewal processes mainly work permits for foreign workers. The foreign workers were allocated with passport locker to keep their passport and the key was hold by themselves.</p> <p>Based on the Foreign Workers Recruitment Procedures, self-declaration from the recruitment agent need to be filled in to ensure no recruitment fee paid by the workers. All the agreed recruitment fee will be paid by the company and list of recruitment cost was stated in Appendix III of the procedure.</p> <p>Employment contract was signed by the workers as sampled and the worker is allowed to terminate the contract with the serve of notice period. Interview conducted with the workers confirmed that their overtime are on voluntarily basis. They were paid with the overtime rate as per Employment Act 1955. Employment records and interview with workers confirmed that no contract substitution occurred among them.</p>	Complied

6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>GBSE has implemented Social Policy dated 14/09/2020 and People Policy dated 03/08/2009. Besides, Procedures for Social Management (Doc. No.: SMPGPB-32, Rev. 01 dated April 2021) was developed and implemented where the migrant workers are provided with safe living condition, post-arrival orientation on the employment condition, safety & health, sustainability and law & regulations. No discrimination, no recruitment fee and no contract substitution practiced in the company.</p>	Complied
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The Estate Manager has been appointed as Person Responsible / Chairman for Safety and Health in the estate as per appointment letter signed by the Sr. Manager Operations as per appointment letter dated 22/02/2022.</p> <p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the signed Estate Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, housing inspection, workplace inspection, and training. Reviewed the minutes latest minutes meeting conducted in 2022 as follows:</p> <ol style="list-style-type: none"> 1. 28/03/2022 2. 15/06/2022 	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</p>	<p>Genting Plantations Berhad has established accident and emergency procedure and documented in System Procedure: Emergency Response Procedure. Refer document no. SP-MGR-04 dated 1/8/2017.</p>	Complied

	<p>equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Noted during site visit and interview with the workers, the awareness on the ERP was satisfactory. The field mandore were trained and equipped with first aid box for early respond and treatment during accident occur.</p> <p>The estate conducted first aid kit monitoring on monthly basis. Reviewed the monitoring records dated 11/03/2022, 08/04/2022, 06/05/2022, 17/06/2022 and 01/07/2022.</p> <p>The estate has estate conducted training on ERP and first aid kit on annually basis to ensure the workers awareness. Reviewed the training records as follows:</p> <ol style="list-style-type: none"> 1. Emergency response team FY 2022 training dated 20/01/2022 2. Firefighting training dated 24/03/2022 3. First aid training dated 30/03/2022 											
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The estate provide appropriate PPE to the employee's base on the job type. The PPE given as per HIRARC and Standard Operating Procedure. PPE issuance was recorded in 'Borang Pemberian dan Penggantian' PPE by individual basis. Sighted the PPE issuance records for employees as follows:</p> <table border="1" data-bbox="1137 1010 1839 1222"> <tr> <td>Harvester:</td> <td>Sprayers/General Workers:</td> </tr> <tr> <td>1. 02564</td> <td>1. 02381</td> </tr> <tr> <td>2. 02538</td> <td>2. 02377</td> </tr> <tr> <td>3. 02518</td> <td>3. 02551</td> </tr> <tr> <td>4. 02558</td> <td>4. 26785</td> </tr> </table>	Harvester:	Sprayers/General Workers:	1. 02564	1. 02381	2. 02538	2. 02377	3. 02518	3. 02551	4. 02558	4. 26785	<p>Complied</p>
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<p>6.7.4</p>	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial).</p>	<p>Complied</p>										

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		Reviewed the "Jadual Caruman bagi Sistem Insurans Pekerjaan (SIP) and form 8A, "Jadual Caruman" for the month of March, April and May 2022.							
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2021 as reported to DOSH as follows: <table border="1" data-bbox="1137 678 1912 810"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Genting Bukit Sembilan Estate</td> <td>0</td> <td>0</td> </tr> </tbody> </table> Refer report no. JKPP 8/94382/2021 submitted 15/01/2022.	Operating units	Accident Cases	LTA	Genting Bukit Sembilan Estate	0	0	Complied
Operating units	Accident Cases	LTA							
Genting Bukit Sembilan Estate	0	0							
Principle 7: Protect, conserve and enhance ecosystems and the environment									
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.									
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	Integrated Pest Management were addressed in the Oil Palm Manual under section Pest and Disease. Refer document no. OPM 5, rev. June 2013. It identified the pest such as : <ol style="list-style-type: none"> 1. Bagworms 2. Nettle caterpillars 3. Grasshopper 4. Rhinoceros beetles 5. Bunch moth 6. Vertebrates such as rats 7. Pest & Diseases in nursery 8. Ganoderma 	Complied						

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		<p>The estate has established the IPM Management plan as follows:</p> <ol style="list-style-type: none"> 1. Potential of Pest and Threshold Level 2. To increase barn owl box ratio from 1:25 to 1:23 3. Increase barn owl population 4. Implement 1st generation bait 5. Increase planting of beneficial plants at road sides, junction and open space area at ratio 2 chains/ha <p>Reviewed the implementation records as follows:</p> <ol style="list-style-type: none"> 1. The estate conducted barn owl census twice a year. Reviewed the census record conducted in August 2021 with occupancy recorded at 66% and February 2022 with occupancy recorded at 85%. 2. The estate conducted rat damage census on monthly basis. reviewed the census report dated 12/01/2022, 16/02/2022, 09/03/2022 and 06/05/2022 	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>Genting Plantations has established ASEAN Zero Burning Policy (1999) and the Environmental Quality (Declared Activities) (Open Burning) Order 2003 signed by the President and Chief Operating Officer dated 10/8/2011.</p> <p>No evidence and records of fire usage for pest control at all estate visited.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			

7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The justification of all pesticides used in the estate were documented in Sustainability Management procedure Manual under section SOPs and Justification of Pesticides Used. Refer document no. SMP-GPB-28, rev 4 dated 03/07/2018.</p> <p>The SOP addressed on:</p> <ol style="list-style-type: none"> 1. Procedures on pesticides usage 2. Type of pesticides 3. Justification of all pesticides used <ol style="list-style-type: none"> a. Crop stage b. Application Type c. Pesticide Name d. Active Ingredient e. Class (by Pesticide Malaysia) f. WHO class g. Target Weed/Pest 	Complied									
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate.</p> <p>Sighted the sampled records of pesticides usage (KG a.i)per ha at estate visited as follows:</p> <table border="1" data-bbox="1137 1136 1684 1289"> <thead> <tr> <th>Month</th> <th>2020</th> <th>2021</th> </tr> </thead> <tbody> <tr> <td>Mature</td> <td>0.688</td> <td>1.097</td> </tr> <tr> <td>Immature</td> <td>1.360</td> <td>0.257</td> </tr> </tbody> </table>	Month	2020	2021	Mature	0.688	1.097	Immature	1.360	0.257	Complied
Month	2020	2021										
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Sustainability Management</p>	Complied									

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	- Critical (Major) compliance -	procedure Manual under section SOPs and Justification of Pesticides Used. Refer document no. SMP-GPB-28, rev 4 dated 3/7/2018. The implementation in the field is consistent with the SOP established.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	No prophylactic use of pesticide were identified in the estates.	Complied
7.2.5	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. The due diligence refers to: a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. - Minor compliance -	There is no usage of pesticide that are categorised as WHO Class 1A or 1B at the estate visited. Noted during site visit at the chemical store and document review of chemical register dated 01/03/2022, no chemical categorised as WHO Class 1A or 1B were used in the estate.	Complied
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	The pesticides operators has been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly medical check-up done by the Medical Assistant. Sighted the training records as follows: 1. Riparian buffer zone management training dated 10/06/2022	Non-compliance

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	<p>- Critical (Major) compliance -</p>	<ol style="list-style-type: none"> 2. Sprayers gang for mature and immature area training dated 02/03/2022 3. Triple rinse and puncturing of chemical container training dated 03/03/2022 4. Spraying techniques and safety aspects as well as maintenance of Inter Sprayer dated 31/05/2022 5. Bufferzone to manuring and spraying gang training dated 04/01/2022 6. SOP for spraying training dated 20/01/2022 7. PPE for weeders, harvesters, general workers, drivers training dated 15/01/2022 <p>During site visit at chemical store and fertilizer store Genting Bukit Sembilan Estate (Paya Kamunting Division), it was noted that the Safety Data Sheet (SDS) for Kenlly 20 WG dated 15/10/2014 and fertilizer Rock Phosphate dated 14/12/2016 were not reviewed after 5 years.</p> <p>As per CHRA report no. HQ/12/ASS/00/309-2022/001 June 2022 under Section 6.1.8 Safety Data Sheet (SDS) stated "The due date of the SDS needs to be monitored since suppliers must review SDS every 5 years or less".</p> <p>This was also not compliance to OSHA 1994 Class Regulation 2013 section 13 (4) "Revise a SDS referred to in sub regulation if (b) More than five years elapsed since the last date of preparation or revision of the Safety Data Sheet".</p> <p>This indicates the monitoring of validity of Safety Data Sheet was not effectively implemented.</p>	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p>	<p>The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides</p>	<p>Complied</p>

	- Critical (Major) compliance -	are kept in the store and securely locked and comply with regulation.	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	Empty pesticides container were identified as recycle waste. All empty pesticides containers were triple rinse, puncture and stored at designated stored before disposed to licensed contractors, G-Planter Sdn. Bhd. The estate maintain the inventory records of empty pesticides containers. Sighted the records for FY 2019 and todote 2020. Reviewed the latest disposal records by G-Planter Sdn. Bhd. as per UPPCR Collection Form dated 13/04/2022.	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	No evidence of aerial spray conducted at the estate visited.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	Latest Medical Surveillance for chemical handlers was conducted on 24/12/2022 by OHD with reg. no. HQ/12/DOC/00/262. 4 workers were send for surveillance and all were found fit to work as chemical handlers. Latest Chemical Hazard Risk Assessment was conducted on 10/03/2022 by assessor with reg. no. HQ/12/ASS/00/309. Refer report no. HQ/12/ASS/00/309-2022/001. As per report, the estate are required to conduct medical surveillance if the estate decided to use the organophosphate chemical as per OSHA 1994 USECHH Regulation 2000 sub-regulation 1972 in Scheduled II Chemicals. Noted during site visit at the chemical store and document review of chemical register dated 01/03/2022, no chemical listed in Scheduled II were used in the estate.	Complied

		The estate conducted medical check-up for pesticides operator on monthly basis by Hospital Assistant. Among the examination conducted on weight, height, blood pressure, skin, eyes, finger nails, respiration and pulse. Reviewed the Summary-Check Up Spray/Manuring for the month of March, April, May, June and July 2022.										
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has established Safety and Health Manual under section USECHH regulation 2000. Refer document no. OM-GPB-10 dated 1/1/2010.</p> <p>In the SOP under section 9 – Medical Protection Removal clearly stated that the Estate manager can't allow the workers to be expose with chemical if:</p> <ol style="list-style-type: none"> 1. Under the age of 18 2. Pregnant 3. Breastfeeding women 4. Other people that have medical restrictions 	Complied									
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.												
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>The estate had identified all wastes and sources of pollution. The Waste Management Action Plan 2022 were established to mitigate and control the identified wastes and source of pollution. The common significant environmental receptors for the estates and mill operations among others as summarized below;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;"></th> <th style="width: 25%;">Receptor</th> <th style="width: 70%;">Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Sources from (smoke and particulate), vehicle & generator (smoke and gases), EFB dumping)- GHG</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process operations</td> </tr> </tbody> </table>		Receptor	Sources	1	Air	Sources from (smoke and particulate), vehicle & generator (smoke and gases), EFB dumping)- GHG	2	Water	Cleaning water/run-off/process operations	Complied
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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>The Estate had established SOP for has established and maintained a procedure to manage and handle domestic waste hazardous waste such as scheduled waste as guidance and reference. Sampled in Sustainability Management Procedure Manual under a Landfill</p>	Complied																														

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and Domestic Waste Management (SMP-GPB-12) Rev. 02 dated 01/12/14.

Another procedure to manage domestic waste titled Recyclable Waste Management (SMP-GPB-13) Rev.00 dated 11/10/13.

Also established and documented a Scheduled Waste management (SMP-GPB-11) Rev.02 dated September 2020.

Management and disposal of waste water 2022 has been established compiled by Assistant Engineer/Assistants/Staff.

Waste Management Plan 2022 has been established prepared by SD and verified by the Assistant Engineer /Assistants /Manager.

Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.

Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The mill scheduled waste is disposed to Kualiti Alam Sdn Bhd registered with DOE.

	Date	SW 312	SW 410	SW 409	SW 410	SW 305
1	16/08/21	0.0065	0.004	0.0025	0.0075	0.0445
2	26/01/21	0.0500	0.0050	0.0050	-	0.0800

There were delays in SW dispatch in 2021 and 2022 in view of the quantity produced by the estate to meet the optimum logistic by the transporter. Letters from the estate to DOE dated 11/01/2022 and 14/01/2021 for an extension.

Domestic waste for the estate was disposed as follows;

Estate	Landfill site	Remarks
Bkt Sembilan Estate	P96A	Main Division
Bkt Sembilan Estate	P02B	Paya Kemunting Div

The requirement is established and the procedure documented under this subject titled;

- a) Landfill/domestic waste management GBP 12 dated 01/12/14
- b) Scheduled waste management GBP 11 dated 11/08/20
- c) Recyclable waste management GBP 13 dated 11/10/13

The procedure has detailed the definition of solid waste. The types of solid wastes has been categorised as follows;

- a) Commercial / construction solid waste
- b) Household / industrial solid waste.
- c) Institutional solid waste
- d) Imported / public solid waste.

In addition there are 'Pelan Pengurusan Domestik Dan Bahan Buangan Tahun 2022. In this plan activities as scheduled are monitored with the date/month recorded. This was sighted and verified. Both landfill sites have signboard displayed and properly demarcated. The area is sufficiently distant from habitation and water contamination. The site disposal area (landfill area) is shown and marked in the estate map.

The estate also identified the types of domestic waste

- a) Sisa baki (Home domestic)
- b) Sisa pukal e.g. old furniture, electrical appliances.

		<p>c) Sisa kitar semula (Recycled). Inside the Management Plan the estate has included among others. a) Identification of scheduled waste/ domestic waste. b) Process dispose domestic waste to the estate landfill. The estate also maintained records of source identification source and type of scheduled waste. The estate in addition made EPMC meeting annually for discussion in relation to environmental issues sighted minutes of meeting dated 28/03/2022 and 06/03/2021</p>	
7.3.3	<p>The unit of certification does not use open fire for waste disposal. - Minor compliance -</p>	<p>GPB practices of zero burning is enforced and elaborated in the Group Zero Burning Policy dated 10/08/2011 signed by the Group President & Chief Operating Officer and also included in the following guidelines; a) Sustainability Management Procedure Manual 2013 - Safe Operating Procedure. b) Standard Operating Procedure 2013 revised dated 28/1/22 - Safe Work Procedures - Procedure for mixing of chemicals in PREMIX - Chemical Handling - Work Procedures for spraying - Waste Management The operating units adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. Both the estates had replanting program spanned over the forthcoming years as shown in 3.1.2. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied

Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>The estates operations are guided by the following manuals</p> <ul style="list-style-type: none"> a) Genting Plantations Oil Palm Manual OPM issued on 9/11/99 b) Sustainability Management Procedure Manual 1/8/13 revised in 28/01/2022. c) OSH Manual dated 01/01/2010. d) Environmental Control Procedure – 01/9/2018 e) Store Operating Manual – 2014 f) Standard Operating Procedure West Malaysia Estates 17/1/2011. g) Jobs description - 2012 h) Pictorial Safety Standards and Security Guidelines (PSS). i) Laboratory Process Control Manual <p>The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections</p> <ul style="list-style-type: none"> a) OPM No 7. Manuring of oil palm b) OPM no 13. Managing difficult soils <p>The estate continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOP.</p> <p>All the estate operations were guided through the manuals and SOP.</p> <ul style="list-style-type: none"> a) The procedures as documented in the GPB OPM were 	<p>Complied</p>

		<p>disseminated to the staff/workers through morning briefings and training.</p> <p>b) The Manuals are kept in the main office for references of employees particularly for the supervisory personnel.</p> <p>c) The documents included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security.</p> <p>d) Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.</p>									
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>The internal Agronomist from Genting Plantations Research Centre visits estates to perform foliar sampling prior to the fertilizer recommendation for the forthcoming year.</p> <p>a) Leaf and soil nutrient analysis are a common methodology used in the diagnosis of fertilizer requirements in oil palms.</p> <p>b) Foliar analysis reports were then issued to the estates for the program establishment and application. This includes the order of fertilizer and workforce/machine planning.</p> <p>c) Agronomic assessment and fertilizer recommendation formulate the FY2022 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been were carried out in all estates. The latest being:</p> <table border="1" data-bbox="1196 1278 1787 1366"> <thead> <tr> <th></th> <th></th> <th>Report Date</th> <th>Report No</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Leaf Analysis</td> <td>04/03/2022</td> <td>PR08/2022</td> </tr> </tbody> </table>			Report Date	Report No	1	Leaf Analysis	04/03/2022	PR08/2022	Complied
		Report Date	Report No								
1	Leaf Analysis	04/03/2022	PR08/2022								

		<p>d) Soil sampling was carried out accordingly and analysis is made yearly on different fields. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen.</p> <p>e) Soil analysis for PH, Org C, Total N, Total P, Avail P, Exchange K, Exchange Ca & Exchange Mg was carried out on a year cycle basis with the recent carried out as follows:</p> <table border="1" data-bbox="1196 612 1787 707"> <thead> <tr> <th></th> <th></th> <th>Report Date</th> <th>Report No</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Soil Analysis</td> <td>01/04/2016</td> <td>SR08/2016</td> </tr> </tbody> </table>			Report Date	Report No	1	Soil Analysis	01/04/2016	SR08/2016																	
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1	Soil Analysis	01/04/2016	SR08/2016																								
7.4.3	<p>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.</p> <p>- Minor compliance -</p>	<p>The following practices are applied in the estates in relation to the nutrient recycling strategy;</p> <p>a) EFB application in designated fields at dosage of 20-40 mt/ha applied in inter rows subject to Agronomist recommendations.</p> <p>b) Cut frond are stacked in between the palms rows left to discompose.</p> <table border="1" data-bbox="1178 970 1886 1110"> <thead> <tr> <th></th> <th>Field no</th> <th>Ha</th> <th>Mt</th> <th></th> <th>Field no</th> <th>Ha</th> <th>Mt</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PR2021</td> <td>37.67</td> <td>3,334.65</td> <td>3</td> <td>P2001</td> <td>41.25</td> <td>1650</td> </tr> <tr> <td>2</td> <td>P2015</td> <td>11.19</td> <td>447.60</td> <td>4</td> <td>P1998C</td> <td>16.17</td> <td>646.80</td> </tr> </tbody> </table>		Field no	Ha	Mt		Field no	Ha	Mt	1	PR2021	37.67	3,334.65	3	P2001	41.25	1650	2	P2015	11.19	447.60	4	P1998C	16.17	646.80	Complied
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7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizer application program was monitored using records i.e. program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc.</p> <p>a) Records of programs and applications of fertilizers were reviewed by the auditors.</p> <p>b) Review of the records revealed that the actual fertilizers applied in 2021 was in line with the program.</p>	Complied																								

		<p>c) The following fertilizers were applied in the estates on recommendation by the Agronomist GPRC among others;</p> <table border="1" data-bbox="1205 435 1818 807"> <thead> <tr> <th></th> <th>Fertilizer</th> <th>Kg/palm</th> <th>application month</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>IMPAC SP OP1Y</td> <td>0.25</td> <td>Jan</td> </tr> <tr> <td>2</td> <td>IMPAC SP OP1Y</td> <td>0.75</td> <td>Aug</td> </tr> <tr> <td>3</td> <td>NPK</td> <td>1.25</td> <td>Sept</td> </tr> <tr> <td>4</td> <td>A Chloride</td> <td>1.25</td> <td>Oct</td> </tr> <tr> <td>5</td> <td>MOP</td> <td>2.00</td> <td>May</td> </tr> <tr> <td>6</td> <td>FMP</td> <td>3.25</td> <td>June</td> </tr> <tr> <td>7</td> <td>ERP</td> <td>0.50</td> <td>July</td> </tr> </tbody> </table> <p>The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections</p> <ul style="list-style-type: none"> a) OPM No 7. Manuring of oil palm b) OPM no 13. Managing difficult soils 		Fertilizer	Kg/palm	application month	1	IMPAC SP OP1Y	0.25	Jan	2	IMPAC SP OP1Y	0.75	Aug	3	NPK	1.25	Sept	4	A Chloride	1.25	Oct	5	MOP	2.00	May	6	FMP	3.25	June	7	ERP	0.50	July	
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<p>Criterion 7.5: Practices minimise and control erosion and degradation of soils.</p>																																			
<p>7.5.1</p>	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -</p>	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was available. There were no other problem soils (e.g. podzols and acid sulphate soils) in the estate. The soil map is prepared by Soil maps are prepared by Genting Plantations Research Centre data form DOA and reconnaissance Soil Map of WM Soil Survey Division, Soils and Analytical Services dated 27/8/2013.</p> <table border="1" data-bbox="1146 1278 1809 1367"> <thead> <tr> <th></th> <th>Soil type</th> <th>MD/ha</th> <th>PKD/ha</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Gajah Mati-Munchong-Malacca</td> <td>3.37</td> <td>-</td> </tr> </tbody> </table>		Soil type	MD/ha	PKD/ha	1	Gajah Mati-Munchong-Malacca	3.37	-	<p>Complied</p>																								
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		2	Malacca	8.67	-		
		3	Kuah	8.27	-		
		4	Melaka-Tavy-Gajah Mati	79.68	-		
		5	Telemong-Akob-Local Alluvium	-	5.98		
		6	Munchong-Seremban	-	92.02		
		7	Urban Land	-	2.00		
			Total	100.00	100.00		
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Like all GPB estates, the estate visited continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by a Policy is available titled as 'Sustainability Policy dated 03/08/2009 signed by President / Group Chief Operating Officer. The content of the Policy among others includes the following;</p> <ul style="list-style-type: none"> a) Compliance with all related guidelines and regulatory laws. b) Implementation of GAP as stated in OPM /SPM. c) Implement suitable remedial to reduce impact to the environment. <p>Other guidelines were also shown in the following documents among others;</p> <ul style="list-style-type: none"> a) Steep Land Management SMP 10 dated 18/3/21 b) Procedure new planting /new development SMP 27 dated 16/3/20. <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction</p>				Complied	

		<p>terraces, road maintenance and maintenance of soft vegetation in the interlines. Cover crops were planted in the replants and in certain mature areas. The cover crop <i>mucuna bracteata</i> had been planted along crucial slopes by management. Large areas with <i>neprolepis biserrata</i> in the inter rows were sighted during the visit. The slope maps were provided by the GPRC providing the terrain classification with details shown below.</p> <table border="1" data-bbox="1144 627 1787 997"> <thead> <tr> <th></th> <th>Terrain degree</th> <th>Description</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0-6</td> <td>Flat</td> <td>81.05</td> </tr> <tr> <td>2</td> <td>6-10</td> <td>Undulating</td> <td>10.31</td> </tr> <tr> <td>3</td> <td>0-15</td> <td>rolling</td> <td>7.57</td> </tr> <tr> <td>4</td> <td>15-20</td> <td>hilly</td> <td>1..07</td> </tr> <tr> <td>5</td> <td>20-25</td> <td>steep</td> <td>0.00</td> </tr> <tr> <td>6</td> <td>>25</td> <td>Very steep</td> <td>0.00</td> </tr> <tr> <td></td> <td>Total</td> <td></td> <td>100.0</td> </tr> </tbody> </table>		Terrain degree	Description	%	1	0-6	Flat	81.05	2	6-10	Undulating	10.31	3	0-15	rolling	7.57	4	15-20	hilly	1..07	5	20-25	steep	0.00	6	>25	Very steep	0.00		Total		100.0	
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7.5.3	<p>There is no new planting of oil palm on steep terrain. - Minor compliance -</p>	<p>This compliance being addressed in the Sustainable Policy - "Slope and River Protection" dated 03/08/2009 signed by President / Group Chief Operating Officer stating the following among others; "Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly".</p>	Complied																																
<p>Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>																																			

7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	Soil surveys are made and available in a soil map for both the estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.	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>	GPB Group Estates had no planting on areas of more than 25 degree. Plantings on steep slope are either avoided or minimized.	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>	Soil surveys are made and available in a soil map at the estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates. Details as per 7.5.1 and 7.5.2.	Complied
<p>Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>			
7.7.1	<p>(C) 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>	There is no peat soil or soil categorized as marginal or fragile soil in both the estates visited. There was also no new planting in the estates	Not Applicable
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>PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil in both the estates visited. There was also no new planting in the estates	Not Applicable
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil in both the estates visited. There was also no new planting in the estates	Not Applicable

7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>The water and ground cover management programme is documented in the GPB SMP 15 (Water Management in Inland, Costal and Peat lands) issued on 12/11/2014. Details are described in 7.8.1. individual estate and mill had their respective water management plan mainly to monitor among others the following;</p> <ul style="list-style-type: none"> a) Bulk of the supply in view of the location are from SADA. b) Monitor the quality of main water inlet/outlet for pollutants from estate’s operations. c) Contingency during water shortage. d) Monitor the usage of fresh water on monthly basis e) Reuse/recycle waste water. 	Complied
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil in both the estates visited. There was also no new planting in the estates</p>	Not Applicable
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil in both the estates visited. There was also no new planting in the estates</p>	Not Applicable

	- Critical (Major) compliance -												
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil in both the estates visited. There was also no new planting in the estates	Not Applicable										
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.													
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>The Estate water management plan has been established with the recent review made on respectively. Among others the plan therein has emphasized;</p> <p>a) rain water harvesting for cleaning purposes,</p> <p>b) water from the reservoir/catchment for the mill operations</p> <p>c) continual training for workers on water efficiency consumption,</p> <p>d) Desilting of water reservoir to retain the reservoir optimal capacity.</p> <p>e) The action plan in event of draught/water pollution.</p> <p>The estates similarly possessed the following water management plan. Among others containing the following initiatives.</p> <table border="1"> <thead> <tr> <th></th> <th>Source</th> <th>Activity</th> <th>Threat</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reservoir/ pond/ / Rain</td> <td>Chemical mixing</td> <td>Pollution Draught Wastage</td> <td>Enforcement of buffer zone as non-spraying activities.</td> </tr> </tbody> </table>		Source	Activity	Threat	Action Plan	1	Reservoir/ pond/ / Rain	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer zone as non-spraying activities.	Complied
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		2	General Upkeep	Pollution Draught Wastage	Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.
		3	Line site	Pollution Draught Wastage	Every house is supplied with containers. Awareness on water usage efficiency. Outsource from neighboring estates.
		4	Drain upkeep	Interruption water flow at drainage system.	Periodic desilting Building of sand bags at specific points to contain water (weirs)
		5		Water pollution	Prohibit workers from activities at water source Drinking water analysis. Monitor condition of septic tank Adhere SW management procedure to avoid pollution caused by SW.
		<p>The estate does not restrict access to clean water or contribute to pollution of water used by communities. All sources of domestic use are from SADA source. It was also verified that workers have adequate access to clean water i.e using same source of supply for the entire estates complex. Water Management Plan review date 18/01/2022 with NIL issues being raised.</p>			

<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at the estate and mill catchment. Riparian buffer zones have been identified and demarcated. No chemicals and fertilizer application observed been used in their maintenance. In certain areas Guatemala grass / Vertivar sp were planted along the river banks. Guidelines of the width of the rivers and natural courses to be protected have been illustrated in the GPB SMP 14 Sustainability Manual revised dated 16/03/2020. The buffer zones established are as follows:</p> <table border="1" data-bbox="1144 702 1736 981"> <thead> <tr> <th></th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>>40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>Buffer zones were protected. Areas visited for the estate as tabled below;</p> <table border="1" data-bbox="1151 1086 1816 1177"> <thead> <tr> <th></th> <th>Estate</th> <th>Location</th> <th>Area</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bkt Sembilan</td> <td>P2005</td> <td>Waterways/small catchment</td> </tr> </tbody> </table> <p>The estate made an monthly water samples at 2 points in the river nearby i.e hulu & hilir water course flowing within the estate with results shown below. No major issues were noted/recorded. Analysis made by GPRC.</p> <table border="1" data-bbox="1155 1350 1892 1396"> <thead> <tr> <th></th> <th>Parameter</th> <th>unit</th> <th>STD</th> <th>Inlet P05</th> <th>Outlet P05</th> </tr> </thead> <tbody> </tbody> </table>		River width	Buffer zone	1	>40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters		Estate	Location	Area	1	Bkt Sembilan	P2005	Waterways/small catchment		Parameter	unit	STD	Inlet P05	Outlet P05	<p>Complied</p>
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6 A Nitrogen	mg/L	20	7.0	7.3																																							
S Solids	Mg/L	100	220	278																																							
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -	This indicator is not applicable as this is a single Bukit Sembilan Estate certification.	Not Applicable																																								
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	This indicator is not applicable as this is a single Bukit Sembilan Estate certification.	Not Applicable																																								
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																																											
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2022. The document was	Complied																																								

reviewed/updated on 08/01/2022. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:

No	Target	Objective	Action plan
1	Backhoe tractor/ Machines	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel
2	Van / Supervis ory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.
3	Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources

The utilization of fossil fuel in 2018-2021 is being monitored with records shown below:

Year	2018	2019	2020	2021	2022 June to date
Diesel L/FFB mt	2.86	3.19	3.04	3.64	3.14

The estate records and monitors the diesel utilization over the running hours of gen-set and other vehicles running.

Performance variation in view of several factors i.e.

- a) Infrastructure of estates,
- b) Community size / no of gen-sets,
- c) No. of vehicles / age of machine.

		<p>d) Weather interference / crop production volume</p> <p>There is no opportunity for the estate to capitalize the utilization of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation. The estate adopted the following practices in reducing diesel consumption in the daily operations.</p> <table border="1" data-bbox="1155 571 1879 788"> <thead> <tr> <th></th> <th>Management Plan</th> <th>Timeline</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Monitoring of diesel usage in FFB transportation</td> <td>On-going</td> <td>AEM</td> </tr> <tr> <td>2</td> <td>Engine OFF when not in operations</td> <td>On-going</td> <td>AEM</td> </tr> <tr> <td>3</td> <td>Training session to PIC</td> <td>Schedule</td> <td>AEM</td> </tr> </tbody> </table> <p>A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2022 identified in the following</p> <ul style="list-style-type: none"> a) Environmental Aspect Identification Summary FY 2022 reviewed accordingly. b) Environmental Impact Evaluation Summary FY 2022 reviewed accordingly. c) Renewable energy usage & diesel consumption 2022 was established and monitored by monthly basis. 		Management Plan	Timeline	PIC	1	Monitoring of diesel usage in FFB transportation	On-going	AEM	2	Engine OFF when not in operations	On-going	AEM	3	Training session to PIC	Schedule	AEM	
	Management Plan	Timeline	PIC																
1	Monitoring of diesel usage in FFB transportation	On-going	AEM																
2	Engine OFF when not in operations	On-going	AEM																
3	Training session to PIC	Schedule	AEM																
<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>																			
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements.</p>	Complied																

		<p>Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4.0 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was correct.</p>									
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>No development within Genting Bukit Sembilan Estate Certification Unit since 2014.</p>	Complied								
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The estate has identified significant pollutants generated and plan to reduce or minimize has been established and documented in Significant Pollutants and Greenhouse Gas(GHG) Emission Reduction/Minimization Plan dated 18/01/2022. Among the sampled management plan established as follows:</p> <table border="1"> <thead> <tr> <th>Pollutants</th> <th>Management Plan</th> </tr> </thead> <tbody> <tr> <td>Continuously running engine by tractors and lorries</td> <td>To educate drivers Monitor diesel usage for reduction</td> </tr> <tr> <td>High diesel consumption by farm tractors</td> <td>Replace farm tractors with mini tractors/ grabbers</td> </tr> <tr> <td>High diesel consumption due to scattered harvesting and evacuation fields</td> <td>Cluster harvesting and systematic evacuation</td> </tr> </tbody> </table>	Pollutants	Management Plan	Continuously running engine by tractors and lorries	To educate drivers Monitor diesel usage for reduction	High diesel consumption by farm tractors	Replace farm tractors with mini tractors/ grabbers	High diesel consumption due to scattered harvesting and evacuation fields	Cluster harvesting and systematic evacuation	Complied
Pollutants	Management Plan										
Continuously running engine by tractors and lorries	To educate drivers Monitor diesel usage for reduction										
High diesel consumption by farm tractors	Replace farm tractors with mini tractors/ grabbers										
High diesel consumption due to scattered harvesting and evacuation fields	Cluster harvesting and systematic evacuation										

Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>There was no land preparation in the Estates CU by burning ever since Genting Plantations practice zero burning as per the policy in the Zero Burning Policy dated 10/8/11 signed by the President & Chief Operating Officer. Therein stating</p> <ul style="list-style-type: none"> a) No open burning of any kind in all OU b) All types of waste products disposed appropriately c) Limited open burning allowed for cooking and religious purposes under appropriate supervision. <p>In the 2021/22 replants visited during the audit in GBSE it was evident that all palms were felled, shredded, windrowed and left to decompose.</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. - Minor compliance -</p>	<p>There was no land preparation in the Estate by burning ever since Genting Plantations practice zero burning as per the policy in the Zero Burning Policy dated 10/8/11 signed by the President & Chief Operating Officer. Therein stating</p> <ul style="list-style-type: none"> a) No open burning of any kind in all OU b) All types of waste products disposed appropriately c) Limited open burning allowed for cooking and religious purposes under appropriate supervision. <p>In the 2021/22 replants visited during the audit in GBSE it was evident that all palms were felled, shredded, windrowed and left to decompose. The estate adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. There is a fire ERP team established by the estates and mill.</p>	Complied

<p>7.11.3</p>	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -</p>	<p>GPB engaged smallholders on the fire prevention and control measures. This was mentioned in the stakeholder meeting and various mode via feedback given by the members.</p> <table border="1" data-bbox="1144 475 1727 660"> <thead> <tr> <th></th> <th>Date</th> <th>Attendees</th> <th>Mode</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>04/01/2022</td> <td>17 members</td> <td>Feedback method</td> </tr> <tr> <td>2</td> <td>14/07/2022</td> <td>7 members</td> <td>Contractor meeting</td> </tr> <tr> <td>3</td> <td>24/05/2022</td> <td>7 members</td> <td>Contractor meeting</td> </tr> </tbody> </table> <p>Details as elaborated among others includes;</p> <ul style="list-style-type: none"> a) Establishment of GPB SOP ref SOP PD - 12 Oct 2020 titled Fire Prevention & Measures and Engagement with Stakeholders. b) Briefing to all present on agenda no 8 & 9 on pollution issues and fire burning direct and indirect incidences. c) Hot spot monitoring by GPRC personnel based in Sepang. d) Safety Health and Environment e) Implementation of no open burning /domestic waste management f) Sustainability Policies <p>There were follow-up on the briefing and others commitment through stakeholder feedback in a form distributed by the mill/estate at specified dates above.</p>		Date	Attendees	Mode	1	04/01/2022	17 members	Feedback method	2	14/07/2022	7 members	Contractor meeting	3	24/05/2022	7 members	Contractor meeting	<p>Complied</p>
	Date	Attendees	Mode																
1	04/01/2022	17 members	Feedback method																
2	14/07/2022	7 members	Contractor meeting																
3	24/05/2022	7 members	Contractor meeting																
<p>Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>																			
<p>7.12.1</p>	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p>	<p>The audit findings have confirmed that there is no new planting (refer 7.7.1) affecting present HCV and primary forest. There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV.</p>	<p>Complied</p>																

	<p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>																	
<p>7.12.2</p>	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>The CH had re-assessed to collate information relating to HCV. The assessment contained information of both planted area and relevant wider landscape-level, and result HCV identified. The HCV assessment for the estate was made by a qualified assessor titled Inventory On HCV sited in Feb-Mar 2010). "High Conservation Value (HCV) Final Report (Northern Region) dated 26-27 Mac 2010 by Dr Yap SK. The report was sighted and verified. The HCV identified in the estate as follows;</p> <table border="1" data-bbox="1144 804 1883 970"> <thead> <tr> <th></th> <th>Description</th> <th>HCV 1.4</th> <th>HCV 4.2</th> <th>HCV 6</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Steep area sites /rocky area at OP 93</td> <td>/</td> <td>/</td> <td>-</td> </tr> <tr> <td>2</td> <td>Temple /Cemetery area) PKD</td> <td></td> <td>-</td> <td>/</td> </tr> </tbody> </table> <p>The following aspects areas were assessed as to their state and management.</p> <p>a) Area of HCV-Shared management of forest reserve and boundary areas/buffer zones</p> <p>b) The presence of large mammals and birds and how they are protected from poaches.</p> <p>c) IPM: use of plants to attract <i>parasitoids</i> to control bagworms & barn owls for rats management and success</p> <p>d) Drainage and the conditions. Determining the presence of fishes as a bio-indicator of water health</p>		Description	HCV 1.4	HCV 4.2	HCV 6	1	Steep area sites /rocky area at OP 93	/	/	-	2	Temple /Cemetery area) PKD		-	/	<p>Complied</p>
	Description	HCV 1.4	HCV 4.2	HCV 6														
1	Steep area sites /rocky area at OP 93	/	/	-														
2	Temple /Cemetery area) PKD		-	/														

		<p>The report details the findings of a rapid appraisal of the biodiversity in the estates and addresses the RSPO P&C relevant to biodiversity conservation and HCV. Therein being provided details relating to the following;</p> <ul style="list-style-type: none"> a) General biodiversity issues b) Watercourses and drainage c) Habitats natural and man-made d) Wildlife e) Ponds and reservoirs f) Wetlands /watercourses g) Legal aspects h) Immediate and long term effect. 	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>The auditor verified that there is no HCVs, HCS forests identified after 15 November 2018. The audit findings have confirmed that there is no new planting (refer 7.7.1) affecting present HCV and primary forest. There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV.</p>	Complied
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated</p>	<p>The auditor verified that there is no HCVs, HCS forests identified after 15 November 2018 where rights of local communities had been identified. The audit findings have confirmed that there is no new planting (refer 7.7.1) affecting present HCV and primary forest.</p>	Complied

	<p>agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV.</p>	
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations.</p> <p>a) There is only common bird, presence of wild boar and monkeys occasionally sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan reviewed in Jan 2022.</p> <p>b) The assessment contained information of both planted area and relevant wider landscape-level, and result of HCV was obtained.</p> <p>c) Continuous HCV and Biodiversity training was last conducted on 01/04/2021. Daily morning briefing includes reminder to workers regarding the HCV and species protection.</p> <p>d) In addition there were signage about RTE species and hunting restriction were also planted at strategic places in the estate.</p>	Complied
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>Monitoring of these areas are made through the daily field supervision by the field staff and executives.</p> <p>a) There were also visits by the GM/SHO and also personnel from the Sustainability unit.</p> <p>b) Sighting of RTE are made and recorded during the AP rounds in the estates if any.</p> <p>c) At current status there was no RTE species identified based on inventory of HCV Sites within GPB Group of Estates (Northern Region) dated 27/03/2010. Based on the summary, only totally</p>	Complied

		<p>protected and protected birds, mammals and herpetofauna based on IUCN list sighted at specific location in the estate.</p> <p>d) Outcome of the monitoring updated in the management and monitoring plan for HCV areas and RTE species.</p> <p>e) Monitoring of HCV and wildlife/RTE was done once every 4 months based on established SOP, SMP-GPB-30 (Procedures on Management of HCV areas)</p>	
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new planting affecting present HCV and primary forest. There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV.</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for **Genting Bukit Sembilan Estate** and supply base was calculated using the PalmGHG Calculator version 4. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2021** for **Genting Bukit Sembilan Estate** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.00
PKO	0.00

Extraction	%
OER	0.00
KER	0.00

Production	t/yr
FFB Process	0.00
CPO Produced	0.00
PKO Produced	0.00

Land Use	Ha
OP Planted Area	1,180.06
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	2.15
Total	1,182.21

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	8,371.13	0.39	0.00	0.00	0.00	0.00	8,371.13	0.39
CO ₂ Emission from fertilizer	784.06	0.04	0.00	0.00	0.00	0.00	784.06	0.04
NO ₂ Emission	559.57	0.03	0.00	0.00	0.00	0.00	559.57	0.03
Fuel Consumption	154.69	0.01	0.00	0.00	0.00	0.00	154.69	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-7,852.72	-0.36	0.00	0.00	0.00	0.00	-7,852.72	-0.36
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	2,016.73	0.09	0.00	0.00	0.00	0.00	2,016.73	0.09

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

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

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	0.00

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0.00
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

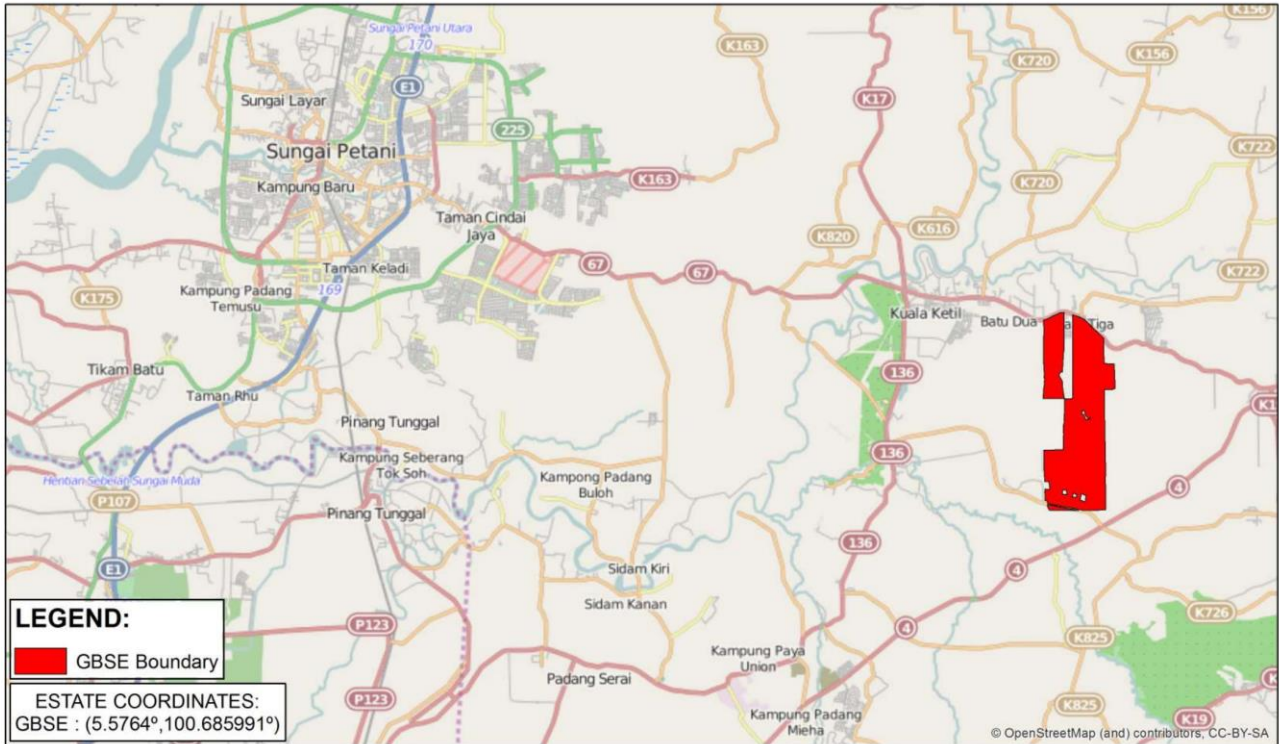
Appendix C: Location Map of Certification Unit and Supply bases



LOCATION MAP
GENTING BUKIT SEMBILAN ESTATE



Scale 1:131,700



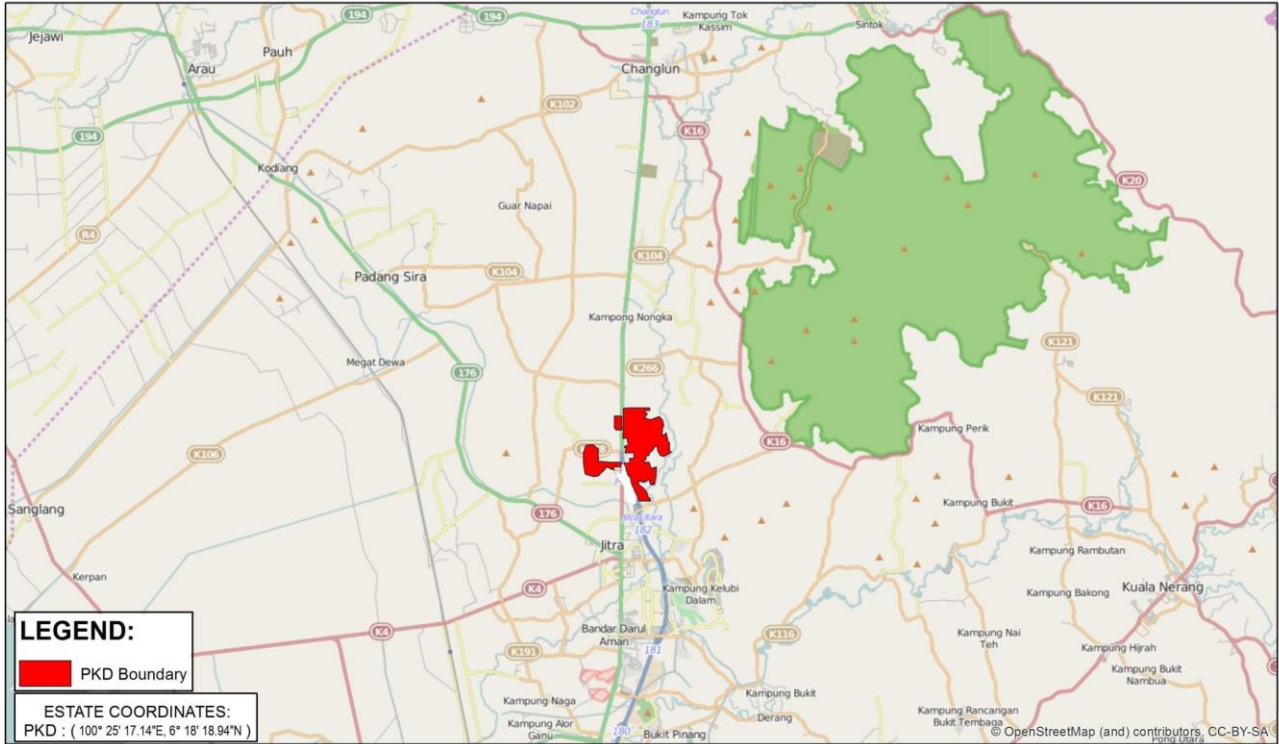


LOCATION MAP

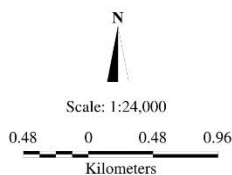
GENTING BUKIT SEMBILAN ESTATE
PAYA KAMUNTING DIVISION



Scale 1:175,500



Appendix D: Estate Field Map



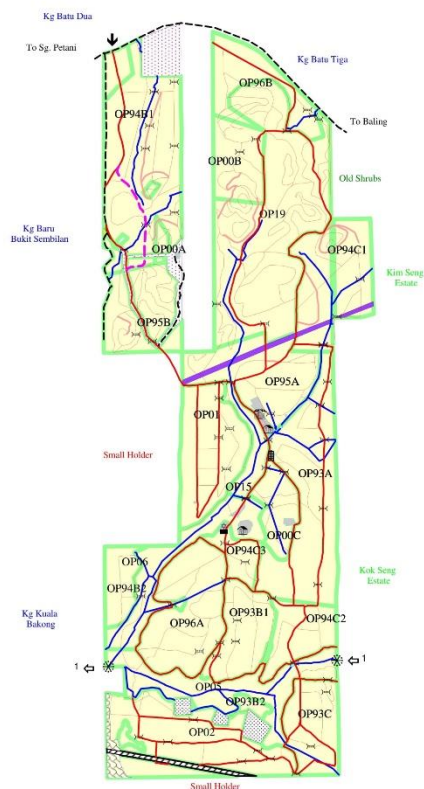
Genting Bukit Sembilan Estate (Bukit Sembilan Division)

BLOCK	PLANTED_HA
OP93A	65.91
OP93B1	26.23
OP93B2	3.05
OP93C	25.89
OP94B1	76.26
OP94B2	13.68
OP94C1	42.10
OP94C2	20.72
OP94C3	9.46
OP95A	37.78
OP95B	31.80
OP96A	46.98
OP96B	30.32
OP00A	3.27
OP00B	22.22
OP00C	16.16
OP01	41.25
OP02	55.38
OP05	37.40
OP06	31.32
OP15	11.19
OP19	110.47
TOTAL	758.84

Estate/Division	Hectarage		
	Planted	Non Planted	Total
GBSE BSD	758.84	33.86	792.70

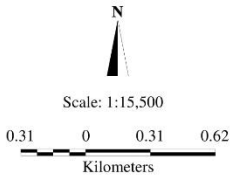
GENTING BUKIT SEMBILAN ESTATE
09300 KUALA KETIL,
KEDAH DARUL AMAN.

GENTING PLANTATIONS
GPS MAP OF GENTING SEMBILAN ESTATE



Projection : Longitude/Latitude
Datum : WGS 84
Data Source : GPS Survey
Prepared by :
Genting Plantations Research Centre (GPRC)
Date Updated : 07/02/2020

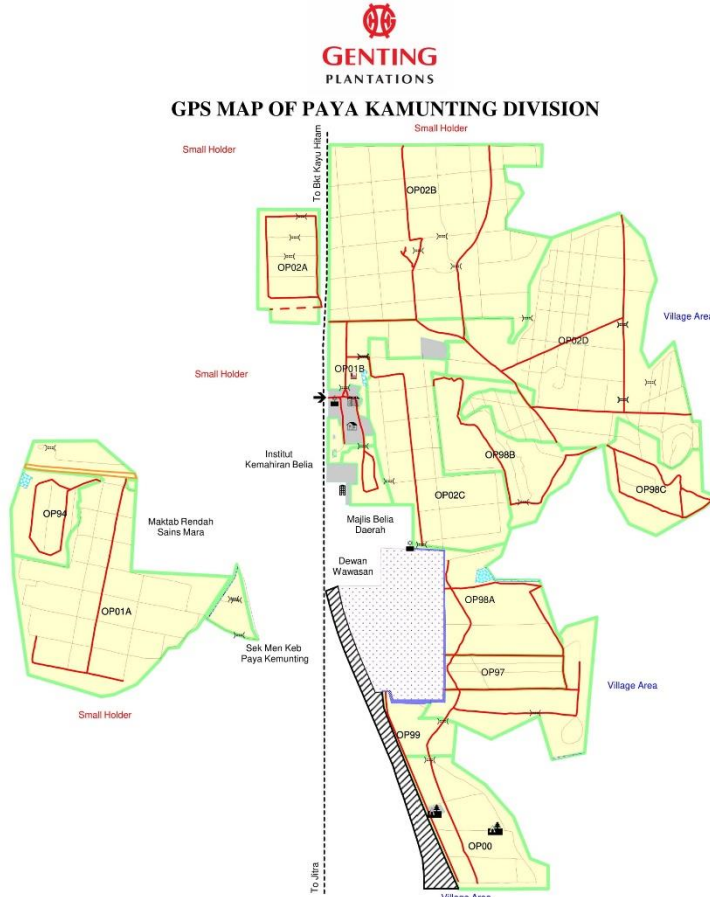
RSPO P&C Public Summary Report
Revision 13 (Apr 2022)



Paya Kamunting Division

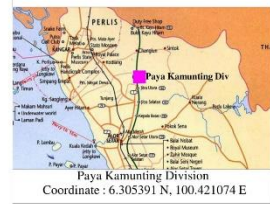
Block	Planted_Ha
OP94	12.26
OP97	8.76
OP98A	20.73
OP98B	22.68
OP98C	16.17
OP99	9.78
OP00	43.05
OP01A	65.87
OP01B	13.79
OP02A	14.79
OP02B	78.25
OP02C	35.86
OP02D	78.77
TOTAL	420.66

Estate/Division	Planted	Non Planted	Total
GRSE PKD	420.66	20.53	441.19



LEGEND :

- Office
- Line Site
- Temple
- Cemetery
- Main Entrance
- School
- Culvert
- Main Road
- Field Road
- Government Tar Road
- Village Road
- Reserve Road
- Water Body
- Trenches
- Ditch
- Ramp
- Teak Area
- Squatter Area
- Highway
- Building / Infrastructure
- Acquired Area
- Paya Kamunting Division



Projection : Longitude/ Latitude
 Datum : WGS 84
 Data Source : GPS Survey
 Prepared by :
 Genting Plantations Research Centre (GPRC)
 Date Updated : 07/02/2020

GENTING BUKIT SEMBILAN ESTATE,
 09300 KUAL KETIL,
 KEDAH DARUL AMAN

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

Appendix E: List of Smallholder Registered and/or sampled

Not applicable

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total									
Note: * are smallholders sampled in this audit.									

Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
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