

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (4)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company name (Parent Company): FGV Holdings Berhad
Client company Address: Level 20 West, Wisma FGV, Jalan Raja Laut, 50350 Kuala Lumpur, Malaysia
Certification Unit: FGV Palm Industries Sdn Bhd Bukit Sagu Palm Oil Mill
Location of Certification Unit: Jalan Gugusan Felda Bukit Sagu 26050 Kuantan, Pahang, Malaysia
Date of Final Report: 09/03/2022

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	FGV Holdings Berhad		
RSPO Membership Number	1-0225-16-000-00	Membership Approval Date	27/12/2016
Address	Level 20 West, Wisma FGV, Jalan Raja Laut, 50350 Kuala Lumpur, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	FGV Palm Industries Sdn Bhd Bukit Sagu Palm Oil Mill		
Location / Address	Jalan Gugusan Felda Bukit Sagu 26050 Kuantan, Pahang, Malaysia		
Website	https://www.fgvholdings.com/home/		
Management Representative	Ameer Izyanif Bin Hamzah	E-mail	ameer.h@fgvholdings.com
Telephone	03-27890497	Facsimile	03-27890440

2. Certification Information			
Certificate Number	RSPO 666409	Certificate Start Date	29/12/2017
Date of First Certification	29/12/2017	Certificate Expiry Date	28/12/2022
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. • Has undergone 30% remote audit with extension scope and the remaining 70% is to be covered through this on-site assessment visit 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 4) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	<input type="checkbox"/> 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 type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 mt/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 700745	MSPO MS 2530-3:2013	BSI Services (M) Sdn Bhd	23/03/2024
MSPO 700744	MSPO MS 2530-4:2013	BSI Services (M) Sdn Bhd	23/03/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
FGVPISB Bukit Sagu Palm Oil Mill	Jalan Gugusan Felda Bukit Sagu, 26050 Kuantan, Pahang, Malaysia	3° 58' 1" N	103° 8' 51" E
FGVPM Bukit Sagu 04 Estate	Jalan Gugusan Felda Bukit Sagu, 26050 Kuantan, Pahang, Malaysia	4° 0' 46" N	103° 9' 17" E
FGVPM Bukit Sagu 06 Estate	Jalan Gugusan Felda Bukit Sagu, 26050 Kuantan, Pahang, Malaysia	4° 2' 46" N	103° 6' 36" E
FGVPM Bukit Sagu 07 Estate	Jalan Gugusan Felda Bukit Sagu, 26050 Kuantan, Pahang, Malaysia	3° 59' 29" N	103° 6' 1" E
FGVPM Bukit Sagu 08 Estate	Jalan Gugusan Felda Bukit Sagu, 26050 Kuantan, Pahang, Malaysia	3° 57' 39" N	103° 11' 21" 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
FGVPM Bukit Sagu 04 Estate	2,879.75	-	460.45	3,340.29	86.22
FGVPM Bukit Sagu 06 Estate	1,658.08	10.00	258.60	1,926.68	86.06
FGVPM Bukit Sagu 07 Estate	1,830.37	-	374.42	2,204.79	83.02
FGVPM Bukit Sagu 08 Estate	1,833.07	2.60	397.43	2,233.10	82.09
Total	8,201.27	12.60	1,490.90	9,704.77	84.51

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6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
FGVPM Bukit Sagu 04 Estate	-	2,046.16	530.82	36.43	266.34	2,879.75	-
FGVPM Bukit Sagu 06 Estate	358.04	1,300.04	-	-	-	1,300.04	358.04
FGVPM Bukit Sagu 07 Estate	961.50	378.08	-	-	490.79	868.87	961.50
FGVPM Bukit Sagu 08 Estate	175.05	-	1,658.02	-	-	1,658.02	175.05
Total (ha)	1,494.59	3,724.28	2,188.84	36.43	757.13	6,706.68	1,494.59

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Dec 2020-Nov 2021)	Actual (Oct 2020-Oct 2021)		Forecast (Dec 2021-Nov 2022)
		Previous license period (Oct 2020-Nov 2020)	Current license period (Dec 2020-Oct 2021)	
FGVPM Bukit Sagu 04 Estate	49,722.00	9,036.51	36,364.51	52,424.92
FGVPM Bukit Sagu 06 Estate	13,685.00	3,129.03	12,193.76	17,848.28
FGVPM Bukit Sagu 07 Estate	11,789.00	1,833.98	10,897.83	15,416.28
FGVPM Bukit Sagu 08 Estate	35,716.00	7,006.65	25,399.38	39,310.52
Total	110,912.00	105,861.65		125,000.00

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Dec 2020-Nov 2021)	Actual (Oct 2020-Oct 2021)		Forecast (Dec 2021-Nov 2022)
		Previous license period (Oct 2020-Nov 2020)	Current license period (Dec 2020-Oct 2021)	
Nil				
Total				

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Dec 2020-Nov 2021)	Actual (Oct 2020-Oct 2021)		Forecast (Dec 2021-Nov 2022)
		<i>Previous license period (Oct 2020-Nov 2020)</i>	<i>Current license period (Dec 2020-Oct 2021)</i>	
Amalan Widuri Sdn Bhd		1,071.53	3,609.27	
Ekstrapalma Sdn Bhd		104.37	607.13	
Eng Huat Latex Concentrate Sdn Bhd		2,592.12	11,345.91	
Felda Bukit Goh		4,080.27	19,103.80	
Felda Bukit Kuantan		131.79	2,072.25	
Felda Bukit Sagu 1		7,438.43	25,992.45	
Felda Bukit Sagu 2		1,955.32	8,007.55	
Felda Bukit Sagu 3		1,961.88	7,790.46	
Felda Cherul 1		873.15	2,099.94	
Felda Cherul 2		1,432.99	4,925.81	
FGVPM Cerul 3		4,015.95	12,832.47	
JKKR Felda Cherul 1&2		-	9.91	
Kim Ma Oil Palm		-	539.20	
Mohd Raffi Bin Mat Arif		295.53	1,221.92	
Mutiara Sulaman Sdn Bhd		561.78	2,004.81	
Sediabudi Sdn Bhd		149.84	548.15	
Seng Highland Fruits Trading		538.37	3,289.50	
Tai Ichi Enterprise Sdn Bhd		1,885.36	10,309.76	
Total			145,398.97	

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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	Oct-20	11,367.12	15,783.26	27,150.38
2	Nov-20	9,639.05	13,305.42	22,944.47
3	Dec-20	8,371.93	10,518.26	18,890.19
4	Jan-21	5,199.54	6,211.09	11,410.63
5	Feb-21	4,192.16	5,961.84	10,154.00
6	Mar-21	6,122.03	7,112.54	13,234.57
7	Apr-21	7,037.80	8,047.13	15,084.93
8	May-21	7,458.48	9,805.59	17,264.07
9	Jun-21	7,196.36	10,987.78	18,184.14
10	Jul-21	8,206.03	11,600.16	19,806.19
11	Aug-21	10,872.45	15,767.28	26,639.73
12	Sep-21	10,366.08	15,130.24	25,496.32
13	Oct-21	9,832.62	15,168.38	25,001.00
TOTAL		105,861.65	145,398.97	251,260.62

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (Dec 2020-Nov 2021)	Actual (Oct 2020-Oct 2021)		Forecast (Dec 2021-Nov 2022)
	Previous license period (Oct 2020-Nov 2020)	Current license period (Dec 2020-Oct 2021)	
FFB (mt)	FFB (mt)		FFB (mt)
110,912.00	21,006.17	84,855.48	125,000.00
	105,861.65		
CPO (mt) (OER: 20.60%)	CPO (mt) (OER: 20.27%)		CPO (mt) (OER: 20.75%)
22,847.87	4,403.57	17,049.55	25,937.50
	21,453.12		
PK (mt) (KER: 5.00%)	PK (mt) (KER: 4.86%)		PK (mt) (KER: 5.00%)
5,545.60	1,014.18	4,132.11	6,250.00
	5,146.29		

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10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Oct-20	2,385.06	505.47
2	Nov-20	2,018.51	508.71
3	Dec-20	1,632.56	348.91
4	Jan-21	734.70	194.47
5	Feb-21	847.03	212.40
6	Mar-21	1,335.59	312.49
7	Apr-21	1,360.92	397.58
8	May-21	1,552.49	382.75
9	Jun-21	1,471.09	362.72
10	Jul-21	1,637.30	362.72
11	Aug-21	2,293.21	564.47
12	Sep-21	2,181.07	533.64
13	Oct-21	2,003.59	459.96
TOTAL		21,453.12	5,146.29

11. Summary of Actual Volume sold					
Current License period (Dec 2020-Oct 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	-	-	-	17,202.11	17,202.11
PK (MT)	3,813.31	-	-	369.04	4,182.35
Credits	-	-	-	-	-
Previous License period (Oct 2020-Nov 2020)					
CPO (MT)	-	-	-	4,486.70	4,486.70
PK (MT)	1,086.49	-	-	-	1,086.49
Credits	-	-	-	-	-
Note:					
Difference of -235.69 mt for CPO compared to production due to carried forward stock from previous period.					
Difference of -122.55 mt for PK compared to production due to carried forward stock from previous period.					

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11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any) (Oct 2020-Oct 2021)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Non-disclosure 1	-	-	4,899.80
TOTAL			-	4,899.80

11B. Records of CPO & PK Sold under other schemes since the last audit (if any) (Oct 2020-Oct 2021)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	Nil			
TOTAL				

11C. Records of CPO & PK Sold as conventional since the last audit (if any) (Oct 2020-Oct 2021)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Non-disclosure 2	21,688.81	-
2	Non-disclosure 3	-	369.04
TOTAL		21,688.81	369.04

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any) (Oct 2020-Oct 2021)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil		
TOTAL			

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12. Independent Smallholders Certified Tonnage / Volume - NA									
Phase	Estimated last year (Dec 2020-Nov 2021)			Actual (Oct 2020-Oct 2021)			Forecast (Dec 2021-Nov 2022)		
	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									
IS-CSPO									
IS-CSPKO									
IS-CSPKE									

13. Independent Smallholders Actual Sold Tonnage / Volume -NA						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period (<i>key in period</i>)						
Credits						
Physical						

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
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BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 08-11/11/2021. The audit programme is included as Section 2.3. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24th March 2020. The remote audit was conducted on 12-14/10/2021.

The approach to the audit was to treat the mill and supply base 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 08/02/2022. It was remotely conducted using MS Teams since desktop verification deemed to be sufficient to close the NCR. The audit programs are included in Section 2.3. For NCR #2117390-202110-M1, the date of closure has exceeded 90 days due to the office of one management unit (Bukit Sagu 7 Estate) was badly affected by flood in December 2021. The certification unit has applied for postponement of NCR closure to BSI on 05/01/2022. With the advice from RSPO (e-mail dated 20/01/2022), the application was granted for additional of 30 more days from the original deadline.

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. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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

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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.

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 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Bukit Sagu Palm Oil Mill	✓	✓	✓	✓	✓
Bukit Sagu 04 Estate	✓	✓	✓	✓	✓
Bukit Sagu 06 Estate	✓	✓	✓	✓	✓
Bukit Sagu 07 Estate	-	✓	✓	✓	✓
Bukit Sagu 08 Estate	-	✓	✓	✓	✓

Tentative Date of Next Visit: October 3, 2022 - October 7, 2022

Total Number of Mandays: 15

2.2 BSI Assessment Team

Name	Role	Competency
Valence Shem (VSH)	Team Leader	<p>Education: BTech (Hons) Bachelor Degree in Industrial Technology, University of Science Malaysia</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1) 9 years working experience in oil palm plantation industry 2) Management system auditing since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS, MSPO and SMETA <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 14001 Lead Auditor Course 2) ISO 9001 Lead Auditor Course 3) Endorsed RSPO P&C Lead Auditor Course 4) Endorsed RSPO SCCS Lead Assessor Course 5) MSPO Awareness Training 6) ISO 45000 Lead Auditor Course 7) SMETA Auditor training 8) HCV-HCS training 9) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course <p>Aspect covered in this audit: Legal requirements, natural and HCV conservation, water & wastes management, environmental aspects, occupational health and safety, GAP, mill best practices, training, economic management plan, and supply chain.</p> <p>Language proficiency: English and Bahasa Malaysia</p>
Hafriazhar Mohd Mokhtar (HMM)	Team Member	<p>Education: Bachelor Degree in Chemical Engineering, University of Technology Malaysia</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1) More than five years of direct work experience in the upstream processes of palm oil within the plantation industry 2) Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days as auditor for multiple disciplines covering Malaysia, Indonesia and Thailand <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 14001 Lead Auditor Course 2) ISO 9001 Lead Auditor Course 3) Endorsed RSPO P&C Lead Auditor Course 4) Endorsed RSPO SCCS Lead Assessor Course 5) MSPO Awareness Training 6) ISO 45000 Lead Auditor Course 7) SMETA Auditor training 8) HCV-HCS training

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		<p>Aspect covered in this audit: Legal requirements, policies and commitment, social aspects, contract agreement, human rights, land use rights, workers’ welfare, and supply chain.</p> <p>Language proficiency: English and Bahasa Malaysia</p>
Vijay Kanna Pakirisamy (VKP)	Team Member	<p>Education: Bachelor’s Degree in Agribusiness Science Management with Honours from University Utara Malaysia</p> <p>Work Experience: 1) 10 year tenure in the oil palm industry – Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad</p> <p>Training attended: 2) ISO IMS 9001 3) ISO 14001 Lead Auditor Course 4) ISO 45001(OHS 18001) 5) Endorsed RSPO P&C Lead Auditor Course 6) Endorsed MSPO Lead Auditor Course 7) SMETA Auditor training 8) HCV-HCS training</p> <p>Aspect covered in this audit: Legal requirements, natural and HCV conservation, water & wastes management, environmental aspects, GAP, mill best practices, training, and economic management plan</p> <p>Language proficiency: English and Bahasa Malaysia</p>

Accompanying Persons:

Name	Role
Nil	

1.3 Assessment Plan

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

Remote assessment plan (30%)

Date	Time	Subjects	VSH	HMM	ICT Planned
Wednesday 06/10/2021	1200	<ul style="list-style-type: none"> Preparatory/test call between client and BSI auditors Communication on document preparation for remote/ICT audit 	✓	Room 1	MS Teams

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Tuesday 12/10/2021	0900-0930	Opening meeting <ul style="list-style-type: none"> Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan 		✓ Room 1	MS Teams, share drive, Whatsapp, email, etc.	
	0930-1030	<u>FGVPM Bukit Sagu 04 Estate and Bukit Sagu 08 Estate</u> Assessment and documentation review on legal requirements, good agriculture practice, economic management plan, OSH, environment, water management, GHG, HCV and continual improvement	✓ Room 1	-		
		<u>FGVPM Bukit Sagu 04 Estate and Bukit Sagu 08 Estate</u> Assessment and documentation review on social aspects, SIA, land use right, legal requirements, employees' welfare, complaint & grievance, and contractors & stakeholder management	-	✓ Room 2		
	1030-1040	10-minute break				
	1040-1230	Continue assessment and documentation review	✓ Room 1	✓ Room 2		
	1230-1330	Lunch break				
	1330-1500	Continue assessment and documentation review	✓ Room 1	✓ Room 2		
	1500-1510	10-minute break				
	1510-1630	Continue assessment and documentation review	✓ Room 1	✓ Room 2		
1630-1700	Interim closing		✓ (Room 1)			
Wednesday 13/10/2021	0900-1030	<u>Bukit Sagu POM, FGVPM Bukit Sagu 07 Estate and Bukit Sagu 06 Estate</u> Assessment and documentation review on legal requirements, good agriculture practice, mill best practice, economic management plan, OSH, environment, water management, GHG, HCV and continual improvement	✓ Room 1	-		
		<u>Bukit Sagu POM, FGVPM Bukit Sagu 07 Estate and Bukit Sagu 06 Estate</u> Assessment and documentation review on social aspects, SIA, land use right, legal requirements, employees' welfare, complaint & grievance, and contractors & stakeholder management	-	✓ Room 2		
	1030-1040	10-minute break				
	1040-1230	Continue assessment and documentation review	✓	✓		

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			Room 1	Room 2	
	1230-1330	Lunch break			
	1330-1500	Continue assessment and documentation review	✓ Room 1	✓ Room 2	
	1500-1510	10-minute break			
	1510-1630	Continue assessment and documentation review	✓ Room 1	✓ Room 2	
	1630-1700	Interim closing	✓ (Room 1)		
Thursday 14/10/2021	0900-1030	<u>Bukit Sagu POM</u> Continue assessment and documentation review for all operating units (if any) and supply chain requirements	✓ Room 1	✓ Room 2	
	1030-1040	10-minute break			
	1040-1200	Continue assessment and documentation review for all operating units (if any) and supply chain requirements	✓ Room 1	✓ Room 2	
	1200-1230	Assessment team discussion and preparation of closing meeting	✓ (Room 1)		
	1230-1300	Closing meeting	✓ (Room 1)		

On-site assessment plan (70%)

Date	Time	Subjects	VSH	HMM	VKP
Monday 08/11/2021	0900-0915	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) 	✓	✓	✓
	0915-1300	<u>Bukit Sagu POM</u> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	✓	✓	✓
	1300-1400	Lunch break			
	1400-1500	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g.	-	✓	-

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		neighboring estates, smallholders, villages, workers representative, etc.), etc.			
	1400-1630	Bukit Sagu POM Document Review P1 – P7: SOPs, Supply chain, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓
	1630-1700	Interim closing briefing			
Tuesday 09/11/2021	0900-1300	Bukit Sagu 04 Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓
	1300-1400	Lunch break			
	1400-1630	Bukit Sagu 06 Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓
	1630-1700	Interim closing briefing			
Wednesday 10/11/2021	0900-1300	Bukit Sagu 07 Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓
	1300-1400	Lunch break			
	1400-1630	Bukit Sagu 08 Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓
	1630-1700	Interim closing briefing			
Thursday 11/11/2021	0900-1100	Bukit Sagu 08 Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓
	1100-1200	Audit team discussion & preparation for closing meeting			
	1200-1300	Closing meeting	✓	✓	✓

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Critical NCR Close-out verification

Date	Time	Subjects	VSH	ICT planned
Tuesday 08/02/2022	0900-0915	Opening briefing by audit team leader	✓	MS Teams, whatsapp, email, Google drive, etc.
	0915-1230	Verification of effective implementation of corrective actions for the following NCR: <ul style="list-style-type: none"> • 2117390-202110-M1 • 2128849-202111-M1 	✓	
	1200-1230	Closing meeting – conclusion and recommendation	✓	

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 plan is inclusive of all current subsidiaries, estates and mills as per time bound plan FY2021. As stated, the management of FGV Holdings Berhad has plan to certify all the complexes starting from 2017 until 2021. The updated time bound plan dated April 2021 shows that the plan spans from year 2017 until 2023.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	33 complexes have been certified from 2017 – 2019 as shown in the TBP below. Remaining 35 mills have undergone internal audit. The time bound plan is behind the scheduled due to tendering process which CB appointment based on yearly selection together with re-suspension by RSPO Complaint Panel for certification processes for all FGV’s uncertified units for unsatisfactory findings on non-compliance of the Complaints Panel Decision dated 28/11/2018. (https://www.rspo.org/news-and-events/news/rspo-statement-regarding-complaints-panel-decision-on-felda-global-venture-holdings) On the latest development of suspension, verification audit by RSPO CP being conducted by an independent certification body (CB) appointed by RSPO to assess and verify the implementation of the action plan at 6 FGV units (unit names are confidential). The exercise being carried out since November 2020. The current status is waiting final report from CP as RSPO has informed FGV Holdings Berhad after meeting conducted on 06/12/2021.	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.	No new acquisitions were recorded or in planning.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	There is a slight delay on certification for the remaining uncertified units due to RSPO Complaint Panel suspension – uplifting decision still pending at RSPO CP side. Refer RSPO letter dated 13 January 2020. Other than that, another possible revision of the TBP involving:	Complied

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	<p>1) Issues pertaining membership as of now FGV management control has been taken over by FELDA through shareholder acquisition.</p> <p>2) Mills and estates rationalization exercises effective June 2021.</p>	
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.</p> <p>Is this consistent with the ACOP reporting?</p>	<p>Slight changes to the time-bound plan since the last audit i.e. stretched to 2023 due to RSPO complaint panel on suspension of FGV. This will be updated in the 2021 ACOP. In addition to that, FGVPI KS Jerangau Baru have ceased operation effective 01/01/2021 and has been removed from the time bound plan. There are also rationalization plans for FGVPM estates which to be concluded in June 2021. Notification to Scheme Owner as well as to Certification bodies in progress.</p>	Complied
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>There are no lapses in implementation of the plan.</p>	Complied
<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>	Complied
Un-Certified Units or Holdings		
<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>There has been no replacement of primary forest area. There were 4 LUCA submitted to RSPO and 2 LUCA review was completed. However, there is one issue reported by Chain Research Reaction regarding HCV clearance in Kalimantan. FGV has briefed the issue to RSPO Secretariat.</p>	Complied
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>There is new planting after 1st January 2010. Liability Disclosure was submitted and waiting for RSPO's decision for further action. The Liability Disclosure involved Asian Plantation Limited and Tanah Emas Oil Palm Processing. FGVPM Tenggara 12 and FGVPM Rantau Abang 02 for new planting with NPP.</p>	Complied
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No land conflict. There were 4 LUCA submitted to RSPO and 2 LUCA review was completed and 3 concept note required as per the RSPO RaCP tracker.</p>	Complied
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>In reference to RSPO Complaints Panel directive findings dated 30/11/2018 and second letter on 13/01/2020 resulting from the verification audit which was carried out in October 2019 as well as several other internal assessment and external audits findings on recruitment issues particularly on</p>	Complied

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	<p>recruitment costs, FGV has taken positive and further steps to ensure that the workers are well informed of FGV policies on the hiring of workers inter alia the cost of recruitment.</p> <p>In addition, since July 2019, FGV has been conducting briefing sessions for its appointed recruitment agencies to communicate and promote understanding about the contents and expectations of the Guidelines and Procedures for the Responsible Recruitment of Foreign Workers. Emphasis is given in particular on ethical recruitment processes and on the non-imposition of recruitment fees by the recruitment agencies on the workers as stipulated in the contract between FGV and the recruitment agencies.</p> <p>Notwithstanding, it is noted that the pre-recruitment costs which include the cost of securing the official documents (ID and passports) and the travel-related cost for these are borne by workers, which some paid to the sub-agent/ agents to assist/ expedite the process.</p> <p>FGV has also revised the contract of Recruitment Agencies Contract to translate FGV's commitment to bear the official costs of recruitments which include, among others, the levy, airfare, cost of medical check-up in Malaysia and insurance. The revised contract includes new provisions prohibiting the agencies from charging the above fees on workers.</p> <p>In order to ensure recruitment agencies, comply with this requirement around imposition of fee, FGV has conducted a series of socialization programs with agencies and their sub-agents in Lombok (Indonesia) on 30-31/01/2020, Chennai (13/01/2020) and Kolkata (14/01/2020). During this process, FGV explained that the costs associated with the recruitment onwards are covered by FGV and on that basis agents and sub-agents shall not charge workers on similar fee.</p> <p>FGV has also established three One-Stop-Center in sourcing country of workers namely Lombok (Indonesia); Chennai (India) and Kolkata (India) where workers go through pre-departure training programme (which is conducted in collaboration with local labour department); interview and selection process. FGV is continuously conducting a socialization programme comprising a serious of engagement sessions involving various stakeholders.</p> <p>Given the size of FGV's operations and the large number of its mills and plantations, the socialization</p>	
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	<p>programme has being carried out in phases in different locations starting June 2019.</p> <p>These action plans being developed and implemented throughout FGV units to mitigate the issues highlighted in the complaints particularly to labour related issues, and its progress report being reporting quarterly to RSPO Secretariat and can be referred on FGV Sustainability website: https://www.fgvholdings.com/sustainability/reports-updates/</p> <p>Further to the action plans, RSPO CP has also carried out verification audits through its appointed Certification Bodies to assess the implementation and the effectiveness of the action plans. On the latest development of the verification audit by RSPO COP, another round of assessment being conducted by an independent certification bodies (CB) appointed by RSPO to assess and verify the implementation of the action plan at six FGV units. The exercise being carried out since November 2020. The current status is waiting final report from CP as RSPO has informed FGV Holdings Berhad after meeting conducted on 06/12/2021.</p>	
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>There is 1 issue happen in FGVPM Palong Timur 04 (Now FGVPM Palong Timur 05) and the details is elaborated below: 1. FGVPM PALONG TIMUR 04 (NOW FGVPM PALONG TIMUR 05): Claims on 19/06/2012 with value of summon RM61,968.60 and summon status is Court Appeal.</p> <p>Auditor Verification: During partial audit, 1 issue with DOE in FPISB Selancar 2A POM is sighted. Summon no : SJ 53-4/2016 ; Date 14/04/2016 in Mahkamah Seksyen Kuantan.</p> <p>Fixed for Trial on 01/03/2017, 02/03/2017 and 03/03/2017.</p> <p>All process still in progress and CB will verify this issue in next audit or during audit in this mill.</p>	<p>Complied</p>
<p>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.</p>	<p>Yes, there have positive assurance statement from internal certification unit. All 67 complexes have conducted internal audit in Year 2019 and 2020. Seen the internal audit done by Sustainability Compliance and Certification Department(SCCD).</p>	<p>Complied</p>
<p>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</p>	<p>There are 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 internal audits.</p>	<p>Complied</p>

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with RSPO?	These issues are addressed through internal audit action plan and implemented phased by phased (according to the timeline) by project. Evidence are available through internal audit reports.	
Have there been any stakeholder (including NGO) consultation conducted?	Stakeholders are being engaged during stakeholders consultation which are being carried out during social impact assessment (SIA).	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.	Bukit Sagu Palm Oil Mill does not receive FFB from any scheme smallholders.	Complied

Approved Time Bound Plan

TIME BOUND PLAN FORECAST FOR RSPO CERTIFICATION OF ALL FGV PALM OIL MILLS & SUPPLY BASES				
Supply Bases (estates, plantations, associations)				
Palm Oil Mill	FFB Supplier	Certification Year	Certification Standard	Status
KS SELANCAR 2B	FGVPM Selancar 06	2017	MYNI 2019	Certified
	FGVPM Selancar 08	2017	MYNI 2019	
	FGVPM Selancar 09	2017	MYNI 2019	
KS ARING A	FGVPM Aring 02	2017	MYNI 2019	Certified
	FGVPM Aring 15	2017	MYNI 2019	
	FGVPM Aring 03	2017	MYNI 2019	
	FGVPM Aring 04	2017	MYNI 2019	
	FGVPM Aring 05	2017	MYNI 2019	
	FGVPM Aring 06	2017	MYNI 2019	
	FGVPM Aring 08	2017	MYNI 2019	
	FGVPM Aring 10	2017	MYNI 2019	
FGVPM Aring 11	2017	MYNI 2019		
KS SELENDANG	FGVPM Selendang 3	2018	MYNI 2019	Certified
	FGVPM Selendang 4	2018	MYNI 2019	
	FGVPM Selendang 5	2018	MYNI 2019	
	FGVPM Berabong 1	2018	MYNI 2019	
KS BUKIT SAGU	FGVPM Bukit Sagu 04	2017	MYNI 2019	Certified
	FGVPM Bukit Sagu 06	2017	MYNI 2019	
	FGVPM Bukit Sagu 07	2017	MYNI 2019	

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Palm Oil Mill	FFB Supplier	Certification Year	Certification Standard	Status
	FGVPM Bukit Sagu 08	2017	MYNI 2019	
KS KERATONG 9	FGVPM Bera Selatan 05	2017	MYNI 2019	Certified
	FGVPM Bera Selatan 07	2017	MYNI 2019	
	FGVPM Merchong	2017	MYNI 2019	
	FGVPM Keratong Timur	2017	MYNI 2019	
	FASSB Merchong	2017	MYNI 2019	
KS LEPAR UTARA 6	FGVPM Lepar Utara 07	2017	MYNI 2019	Certified
	FGVPM Lepar Utara 08	2017	MYNI 2019	
	FGVPM Lepar Utara 09	2017	MYNI 2019	
	FGVPM Lepar Utara 11	2017	MYNI 2019	
KS MOAKIL	FGVPM Moakil 06	2018	MYNI 2019	Certified
	FGVPM Moakil 07	2018	MYNI 2019	
KS KEMASUL	FGVPM Mengkarak 1	2018	MYNI 2019	Certified
	FGVPM Mengkarak 2	2018	MYNI 2019	
KS KRAU	FVGPM Krau 2	2018	MYNI 2019	Certified
	FVGPM Krau 4	2018	MYNI 2019	
KS LEPAR HILIR	FGVPM Lepar Hilir 05	2017	MYNI 2019	Certified
	FGVPM Lepar Hilir 06	2017	MYNI 2019	
	FGVPM Lepar Hilir 08	2017	MYNI 2019	
KS TRIANG	FGVPM Triang 2	2017	MYNI 2019	Certified
	FGVPM Triang Selatan 1	2017	MYNI 2019	
	FGVPM Triang 4	2017	MYNI 2019	
KS KECHAU B	FGVPM Kechau 06	2017	MYNI 2019	Certified
	FGVPM Kechau 08	2017	MYNI 2019	
	FGVPM Kechau 09	2017	MYNI 2019	

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Palm Oil Mill	FFB Supplier	Certification Year	Certification Standard	Status
	FGVPM Kechau 10	2017	MYNI 2019	
	FGVPM Kechau 02	2017	MYNI 2019	
	FGVPM Kechau 03	2017	MYNI 2019	
	FGVPM Kechau 07	2017	MYNI 2019	
	FGVPM Kechau 11	2017	MYNI 2019	
	FGVPM Chegar Perah 2	2017	MYNI 2019	
	FGVPM Telang 01	2017	MYNI 2019	
	FASSB Telang	2017	MYNI 2019	
KS PALONG TIMUR	FGVPM Palong Timur 4/5	2018	MYNI 2019	Certified
	FGVPM Palong Timur 06	2018	MYNI 2019	
BESOUT	FGVPM Besout 06	2018	MYNI 2019	Certified
	FGVPM Besout 07	2018	MYNI 2019	
KS NERAM	FGVPM Cherul 03	2018	MYNI 2019	Certified
KS CHINI 3	FGVPM Terapai 1	2018	MYNI 2019	Certified
	FGVPM Chini Timur 4	2018	MYNI 2019	
KS CHIKU	FGVPM Ciku 4	2018	MYNI 2019	Certified
	FGVPM Ciku 8	2018	MYNI 2019	
KS KERATONG 2	FGVP Bera Selatan 03	2018	MYNI 2019	Certified
KS SERTING	FGVPM Palong 17	2018	MYNI 2019	Re-Certified (External Audit)
	FGVPM Palong 18	2018	MYNI 2019	
	FGVPM Palong 21	2018	MYNI 2019	
	FGVPM Serting Hilir 8	2018	MYNI 2019	
KS KERATONG 3	FGVPM Keratong 11	2018	MYNI 2019	Certified
KS KERTEH	FASSB Kerteh	2018	MYNI 2019	Certified
	FGVPM Semaring 01	2018	MYNI 2019	

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Palm Oil Mill	FFB Supplier	Certification Year	Certification Standard	Status
KS KOTA GELANGGI	FASSB PPTTR	2018	MYNI 2019	Certified
	FASSB K.GELANGGI 5/6	2018	MYNI 2019	
KS JENGA 21	FASSB Jengka 24/25	2018	MYNI 2019	Certified
KS PENGGELI	FGVPM Inas Selatan	2018	MYNI 2019	Certified
KS BELITONG	FASSB Ulu Belitong	2018	MYNI 2019	Certified
	FGVPM Bukit Tongkat B	2018	MYNI 2019	
KS KULAI	FASSB Bkt Besar/Taib Andak	2018	MYNI 2019	Certified
KS ADELA	FGVPM Kledang 2	2018	MYNI 2019	Certified
KS SERTING HILIR	FGVPM Tembangau 03	2018	MYNI 2019	Certified
	FGVPM Tembangau 05	2018	MYNI 2019	
	FGVPM Tembangau 06	2018	MYNI 2019	
	FGVPM Tembangau 07	2018	MYNI 2019	
	FGVPM Tembangau 08	2018	MYNI 2019	
	FGVPM Tembangau 09	2018	MYNI 2019	
	FGVPM Serting Hilir 9	2018	MYNI 2019	
	FASSB Serting Hilir	2018	MYNI 2019	
KS BUKIT KEPAYANG	FGVPM Terapai 3	2018	MYNI 2019	Certified
KS JERANGAU BARU	FGVPM Rantau abang 1	2018	MYNI 2019	Officially closed on 31/12/2020
	FGVPM Rantau abang 2	2021	MYNI 2019	
	FGVPM Chador 1	2018	MYNI 2019	
KS TENGGAROH	FGVPM Tenggaroh 9	2018	MYNI 2019	Certified
	FGVPM Tenggaroh 11	2018	MYNI 2019	
	FGVPM Tenggaroh 13	2018	MYNI 2019	
KS NITAR	FGVPM Nitar Timur	2018	MYNI 2019	Certified
KS CHALOK	FGVPM Setiu 1	2018	MYNI 2019	Certified

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Palm Oil Mill	FFB Supplier	Certification Year	Certification Standard	Status
KS WA HA	FGVPM BUKIT APING SELATAN	2018	MYNI 2019	Certified
KS KALABAKAN	FGVPM Kalabakan Utara 01	TBC	TBC	Targeted to be certified on Year 2022
	FGVPM Kalabakan Selatan	TBC	TBC	
KS HAMPARAN BADA I	FGVPM Sahabat 23	TBC	TBC	Targeted to be certified on Year 2022
	FGVPM Sahabat 24	TBC	TBC	
	FGVPM Sahabat 26	TBC	TBC	
	FGVPM Sahabat 28	TBC	TBC	
	FGVPM Sahabat 31	TBC	TBC	
	FGVPM Sahabat 33	TBC	TBC	
	FGVPM Sahabat 34	TBC	TBC	
	FGVPM Sahabat 25	TBC	TBC	
	FGVPM Sahabat 22	TBC	TBC	
FASSB Tambisan	TBC	TBC		
KS UMAS	FGVPM Umas 05	TBC	TBC	Targeted to be certified on Year 2022
	FGVPM Umas 06	TBC	TBC	
KS PONTIAN FICO	Pontian Fico	TBC	TBC	Targeted to be certified on Year 2022
	Pontian Subok	TBC	TBC	
	Pontian Orico	TBC	TBC	
	Pontian Pendirosa	TBC	TBC	
	Pontian Kuril	TBC	TBC	
	Pontian Hillco	TBC	TBC	
	Pontian Korosah	TBC	TBC	
	Blossom Plantation Sdn. Bhd	TBC	TBC	
KS TEMENTI	FGVPM Bera Selatan 1	TBC	TBC	Targeted to be certified on Year 2022
	FGVPM Bera Selatan 4	TBC	TBC	

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Palm Oil Mill	FFB Supplier	Certification Year	Certification Standard	Status
KS SELANCAR 2A	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS BUKIT MENDI	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS JENGKA 8	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS JENGKA 18	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS JENGKA 3	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS PADANG PIOL	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS TERSANG	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS KEMAHANG	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS CHINI 2	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS JERANGAU BARAT	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS TROLAK	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS SEMENCHU	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS PANCHING	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS AIR TAWAR	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS LOK HENG	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS SG TENGI	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS PASOH	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS KAHANG	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS MEMPAGA	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS SAMPADI	FGVPM Sampadi 01	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sampadi 03	TBC	TBC	
	FGVPM Sampadi 04	TBC	TBC	
	FGVPM Sampadi 05	TBC	TBC	
	FGVPM Sampadi 06	TBC	TBC	

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Palm Oil Mill	FFB Supplier	Certification Year	Certification Standard	Status
KS KEMBARA SAKTI	FGVPM Sahabat 30	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sahabat 35	TBC	TBC	
	FGVPM Sahabat 40	TBC	TBC	
	FGVPM Sahabat 41	TBC	TBC	
	FGVPM Sahabat 42	TBC	TBC	
	FGVPM Sahabat 43	TBC	TBC	
KS NILAM PERMATA	FGVPM Sahabat 50	TBC	TBC	Internal Audit
	FGVPM Sahabat 51	TBC	TBC	
	FGVPM Sahabat 52	TBC	TBC	
	FGVPM Sahabat 53	TBC	TBC	
	FGVPM Sahabat 54	TBC	TBC	
KS MERCU PUSPITA	FGVPM Sahabat 07	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sahabat 46	TBC	TBC	
	FGVPM Sahabat 48	TBC	TBC	
	FGVPM Sahabat 10	TBC	TBC	
	FASSB Sahabat 06	TBC	TBC	
KS LANCANG KEMUDI	FGVPM Sahabat 36	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sahabat 38	TBC	TBC	
	FGVPM Sahabat 39	TBC	TBC	
	FGVPM Sahabat 44	TBC	TBC	
	FGVPM Sahabat 45	TBC	TBC	
KS EMBARA BUDI	FGVPM Sahabat 11	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sahabat 12	TBC	TBC	
	FGVPM Sahabat 17	TBC	TBC	
	FGVPM Sahabat 56	TBC	TBC	

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	FGVPM Sahabat 20	TBC	TBC	
	FASSB Sahabat 17	TBC	TBC	
	FGVPM Sahabat 21	TBC	TBC	
KS BAIDURI AYU	FGVPM Sahabat 09	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sahabat 16	TBC	TBC	
	FGVPM Sahabat 55	TBC	TBC	
KS TENGGAROH TIMUR	FGVPM Tenggaraoh 12	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Tenggaraoh Timur 2	TBC	TBC	
Asian Plantation Milling Sdn. Bhd	Incosetia Sdn. Bhd	TBC	Group Cert	Internal Audit
	Kronos plantations Sdn. Bhd	TBC	Group Cert	
	Fortune Plantation Sdn. Bhd	TBC	Group Cert	
	BJ Corporation Sdn. Bhd	TBC	Group Cert	
Tanah Emas Oil Palm Processing	Sri Kehuma	TBC	Group Cert	Internal Audit
	Yapidmas AE	TBC	Group Cert	
	Tanah Emas Corporation Berhad (TECB)	TBC	Group Cert	
	Ladang Kluang	TBC	Group Cert	
	Yapidmas D	TBC	Group Cert	
	Sri Mosta 1	TBC	Group Cert	
	Sri Mosta 2	TBC	Group Cert	
	Sri Mosta 3	TBC	Group Cert	
	Cepat Ringgit A	TBC	Group Cert	
	Cepat Ringgit B	TBC	Group Cert	
	Cepat Ringgit D	TBC	Group Cert	
	Karamuak	TBC	Group Cert	

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Palm Oil Mill	FFB Supplier	Certification Year	Certification Standard	Status
	Sg Milian	TBC	Group Cert	
	Sg Imbak	TBC	Group Cert	
	Kuamut	TBC	Group Cert	
PT CITRA NIAGA PERKASA	TBA	TBC	INA-NIWG	Internal Audit
PT TEMILIA AGRO ABADI	TBA	TBC	INA-NIWG	Internal Audit
FGV estate without mills	FGVPM Paloh	2018	MYNI 2019	Certified under Kulim (M) Berhad – Tereh POM
Estate under RaCP	TBA	TBC	MYNI 2018	Internal Audit

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 [1 from remote audit (#2117390-202110-M1) and 1 from on-site audit (#2128849-202111-M1)]; two (2) Minor nonconformities [1 from remote audit (#2117390-202110-N1) and 1 from on-site audit (# 2128849-202111-N1) and 0 Opportunity For Improvement raised. The Bukit Sagu Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The close-out verification was remotely conducted on 08/02/2022 as desktop verification is deemed sufficient to close the critical NCRs. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2117390-202110-M1	Date Issued	14/10/2021 (Remote)
Due Date	11/01/2022	Date of nonconformity Closure	08/02/2022* refer to section 2.1
Clause & Category (Critical / Minor)	7.10.1 (Critical)		
Statement of Nonconformity:	Some of the data reported in RSPO GHG calculator are not tally with the recording system (ERML and/or SAP) of the certification unit.		
Requirement Reference:	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.		
Objective Evidence:	<p>Based on verification of the ERML and/or SAP accounting system used by the company, some data were found to be not tally with the data reported in the RSPO's Palm GHG calculator for 2020, e.g.:</p> <p>Bukit Sagu 04 Estate: Total diesel: 53,603 lt (in ERML/SAP) vs. 60,616 lt (in GHG calculator) Total Mixture NK 12.6: 141,680 kg (in ERML/SAP) vs. 571,930 (in GHG calculator) Total NPK 9.5: 1,553,550 kg (in ERML/SAP) vs. 2,051,700 kg (in GHG calculator)</p> <p>Bukit Sagu 06 Estate: Total diesel: 23,161 lt (in ERML/SAP) vs. 21,286 lt (in GHG calculator)</p> <p>Apart from that, the records from Bukit Sagu 07 and Bukit Sagu 08 estates were not made available and therefore data in GHG calculator were unable to be verified.</p>		
Corrections:	<ol style="list-style-type: none"> 1) Appoint person incharge for check the data tally with E-RML/SAP. The data need to be check by Manager/ Assistant Manager 2) To provide Data GHG from Jan -Dec 2020. Projects need to prepare supporting documents related to GHG Data. 		

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Root Cause Analysis:	No verification of the data GHG in the RSPO GHG Calculator by projects.
Corrective Actions:	<ol style="list-style-type: none"> 1) Management to ensure all data given before calculate in RSPO GHG calculator is correct and endorsed by sustainability officer. 2) GHG data verify during periodic internal audit by Sustainability Officer.
Assessment Conclusion:	<p>The following evidence were verified:</p> <ol style="list-style-type: none"> 1) Letters from the Estate Managers dated 29/10/2021 (BS04), 22/10/2021 (BS06), 28/10/2021 (BS07) and 27/10/2021 (BS08) that show persons in-charge responsible for checking the data against E-RML/SAP have been appointed 2) The corrected data in RSPO GHG calculator for 2020 as per SAP recording system and/or stock bin cards for all the estates 3) Record that shows the data have been checked by the Manager/Assistant Managers of the operating units through summary of GHG data <p>The evidence of corrections and corrective actions were found to be adequate to close the NCR. Continuous effective implementation shall be verified in the next assessment visit.</p>

Non-conformity			
NCR Ref #	2128849-202111-M1	Date Issued	11/11/2021 (On-site)
Due Date	08/02/2022	Date of nonconformity Closure	08/02/2022
Clause & Category (Critical / Minor)	3.6.1 (Critical)		
Statement of Nonconformity:	The effective implementation of mitigation measures was not satisfactorily demonstrated.		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	There was an accident happened on 17/08/2021 at Bukit Sagu POM's kernel workstation (Rolek No. 5) where an employee fell from a steep staircase which has caused injury and more than 4 days LTI. Based on the accident investigation report, one of the recommended mitigation measures was to install handrail to the staircase which the mill had already done. There is also a similar staircase at Rolek No. 4, located just next to Rolek No. 5 and covered under the same safety risk evaluation (HIRADC). However, no handrail was installed to the staircase.		
Corrections:	<ol style="list-style-type: none"> 1) Prepare budget on installment handrail 2) Evidence on instalment handrail 		
Root Cause Analysis:	No handrail was installed to the staircase Rolek No 4 due to budget constrain by management.		
Corrective Actions:	Management to discuss regarding budget in management meeting in December 2021 with finance unit, KS Bkt Sagu.		
Assessment Conclusion:	The following evidence were verified:		

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	<p>1) Pictures of handrails have been installed at Rolek No. 4</p> <p>2) Record (e.g. minutes of meeting) that shows the management has conducted a meeting with the finance unit in Dec 2021 with regards to this issue</p> <p>The evidence of corrections and corrective actions were found to be adequate to close the NCR. Continuous effective implementation shall be verified in the next assessment visit.</p>
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Non-conformity			
NCR Ref #	2117390-202110-N1	Date Issued	14/10/2021 (Remote)
Due Date	Next assessment visit	Date of nonconformity Closure	Open
Clause & Category (Critical / Minor)	7.3.1 (Minor)		
Statement of Nonconformity:	The implementation of wastes management plan was not satisfactorily demonstrated.		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
Objective Evidence:	<p>Based on verification through Google Earth, the wastes landfill at Bukit Sagu 04 Estate (GPS: 4° 2'24.55"N 103° 8'9.64"E), Bukit Sagu 06 Estate (GPS: 4° 2'23.77"N 103° 6'34.32"E) and Bukit Sagu 07 Estate (GPS: 3°59'4.95"N 103° 5'52.08"E), there are rivers within their 500 m radius distances. This is not in-line with the company's SOP Pengurusan Sisa Pepejal (Solid Wastes Management SOP) [doc. no.: FGVPM/L2/PAS-02, rev. 1, dated 23/01/2020], Clause 6.1.1.1.1 which reads:</p> <p><i>"Pemilihan kawasan untuk dibuat tapak pelupusan - Mestilah 500 meter dari anak- anak sungai. Kedudukan tapak pelupusan mestilah berada dalam sekitar >500m dari kawasan penempatan penduduk"</i> (The location of landfill area must have a distance more than 500 m from river. It also must be more than 500 m from residential area.).</p>		
Corrections:	<p>1) The Management to appoint an officer to monitor the issue of disposal of domestic wastes at landfill.</p> <p>2) Evidences on implementation of new area landfill management.</p>		
Root Cause Analysis:	No monitoring on wastes landfill area due to no person incharge appointed.		
Corrective Actions:	<p>1) Continuous training to new PIC regarding landfill management- domestic waste, 3R as well as zero burning</p> <p>2) Management to discuss landfill issues every 6 months.</p>		
Assessment Conclusion:	The correction and corrective action plan are accepted. The evidence of effective implementation of the corrective action shall be verified in the next assessment.		

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Non-conformity			
NCR Ref #	2128849-202111-N1	Date Issued	11/11/2021 (On-site)
Due Date	Next assessment visit	Date of nonconformity Closure	Open
Clause & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	The management of SW322 Non-halogenated organic solvents were not adequately demonstrated.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<p>SW322 Non-halogenated organic solvents were generated by the mill at the lab. It was noticed that:</p> <ul style="list-style-type: none"> - The waste was not identified in the Waste Management Plan (Pengenalpastian Sumber & Jenis Bahan Buangan) - The waste inventory was not maintained and updated. - The date of generation was not available at the container used to store the waste in the laboratory. - There was no evidence of disposal under SW322 to DOE Licensed Contractor. - Interview with the lab personal indicated that they were unaware of the procedures of storage and disposal of SW322. 		
Corrections:	<ol style="list-style-type: none"> 1) The Management to conduct training for lab personal regarding SW 322 2) Management to prepare documentation on Inventory & Identification n-hexane as schedule waste in waste management plan 3) To appoint DOE Licensed Contractor to collect SW 322 4) Evidence of date of generation at the container used to store the waste in the laboratory 		
Root Cause Analysis:	No awareness on SW322 Non-halogenated organic solvent to new person in-charged due to new revised manual on Chemical Handling procedure.		
Corrective Actions:	<ol style="list-style-type: none"> 1) Continuous training to New PIC regarding SW management annually based on training need analysis. 2) Management to discuss SW management in Environment meeting annually. 		
Assessment Conclusion:	The correction and corrective action plan are accepted. The evidence of effective implementation of the corrective action shall be verified in the next assessment.		

Opportunity for Improvements	
OFI #	Description
	Nil

Positive Findings	
PF #	Description
PF 1	Very good cooperation and hospitality by management team/staff/sustainability team
PF 2	Good awareness on sustainability aspects among the workers and stakeholders

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1966918-202009-M1	Date Issued	09/10/2020
Due Date	07/01/2021	Date of nonconformity Closure	17/12/2020
Clause & Category (Critical / Minor)	2.3.1 (Critical)		
Statement of Nonconformity:	Not all required information for directly sourced FFB had been collated.		
Requirement Reference:	For all directly sourced FFB, the mill requires: <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 		
Objective Evidence:	Bukit Sagu POM: MPOB license for the following estates are not available during time of audit. <ul style="list-style-type: none"> Felda Bukit Sagu 01 Felda Bukit Sagu 03 Felda Bukit Kuantan Felda Cherul 2 Ladang Cherul 03 Besides, information on geo-location of FFB origins, evidence of ownership status was not available.		
Corrections:	Provide proof of FFB source verification documents from authorized suppliers by providing complete information such as MPOB license, geolocation and land title verification status.		
Root Cause Analysis:	Lack of cooperation from FFB suppliers for action to provide a complete supplier information requirements and staff responsible for continuous updating of supplier information such as copy of updated MPOB license, geolocation and land title verification status for all direct suppliers.		
Corrective Actions:	<ul style="list-style-type: none"> Appoint a responsible staff to obtain complete information for all FFB suppliers directly. The factory management issues a notification letter or holds a meeting with all FFB suppliers to inform the need to provide a copy of the information updated. 		

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	<ul style="list-style-type: none"> • Provide a specific file for each supplier that has a complete list of required information provided. • Provide a record format for monitoring and updating supplier information is always provided.
Assessment Conclusion:	<p>Evidence of corrections and corrective actions verified:</p> <ul style="list-style-type: none"> • Complete documents of MPOB license, GPS of FFB origins and evidence of ownership of related suppliers i.e. Felda Bukit Sagu 01, Felda Bukit Sagu 03, Felda Bukit Kuantan, Felda Cherul 2 & Ladang Cherul 03 • Appointment letter of responsible staff to obtain complete information for all FFB suppliers directly dated 1/12/2020 • Memo to all FFB external FFB suppliers for meeting dated 10/12/2020 • Complete filing systems for all external FFB suppliers with information of MPOB license, GPS of FFB origins and evidence of ownership • Excel spreadsheet monitoring table of "<i>Senarai Semakan Sijil MPOB, Pengesahan Tanah & Maklumat Geolokas</i>" <p>Evidence of corrections and corrective actions taken confirmed the CAP proposed were effective to address the issue. Hence, Critical NC was closed on 17/12/2020.</p>
ASA4 verification	<p>The required information for all directly sourced FFB is well maintained in an excel spreadsheet where information such as Source of FFB, Address of plantation/dealer, MPOB license and Validity, Coordinate, and size of plantation. The mill is also retaining a copy of the relevant documents such as MPOB license and ownership evidence for verification of information. Thus, the NCR remains closed.</p>

Non-conformity										
NCR Ref #	1966918-202009-M2	Date Issued	09/10/2020							
Due Date	07/01/2021	Date of nonconformity Closure	17/12/2020							
Clause & Category (Critical / Minor)	6.2.1 (Critical)									
Statement of Nonconformity:	Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions were not implemented effectively.									
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:	<p>Bukit Sagu POM, Bukit Sagu Estate 04 and Bukit Sagu Estate 06:</p> <p>Sampled payslips for contractor's workers found that they were not paid two days' wages at the ordinary rate of pay for work on public holiday and two days' wages for work on rest day.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">I/C or Passport No.</th> <th style="width: 40%;">Date of Work</th> <th style="width: 30%;">Operating Unit</th> </tr> </thead> <tbody> <tr> <td>930324-06-54XX</td> <td rowspan="2">01/05/2020 (Public Holiday)</td> <td rowspan="2">Bukit Sagu POM</td> </tr> <tr> <td>010710-06-05XX</td> </tr> </tbody> </table>			I/C or Passport No.	Date of Work	Operating Unit	930324-06-54XX	01/05/2020 (Public Holiday)	Bukit Sagu POM	010710-06-05XX
I/C or Passport No.	Date of Work	Operating Unit								
930324-06-54XX	01/05/2020 (Public Holiday)	Bukit Sagu POM								
010710-06-05XX										

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	920113-06-57XX		
	891209-06-52XX		
	010724-06-03XX		
	970414-06-57XX	01/05/2020 (Public Holiday) 05/06/2020, 12/06/2020, 19/06/2020 and 26/06/2020 (Rest Day Work)	
	AT 768921	20/08/2020 (Public Holiday) 28/08/2020 (Rest Day)	Bukit Sagu Estate 06
	C 2726702	07/08/2020 (Rest Day) 20/08/2020 (Public Holiday)	
	840826-03-54XX	20/08/2020 (Public Holiday) 31/08/2020 (Public Holiday)	Bukit Sagu Estate 04

Bukit Sagu Estate 08 and Bukit Sagu Estate 06:

Sampled the payslip for the workers below found that they did not achieve Minimum Wage Order 2019 and 2020.

Employee No.	Month	Wages	Operating Unit
FW 06290765	March 2020	RM 1,112.43	Bukit Sagu Estate 08
FW 06290960	September 2020	RM 1,076.84	Bukit Sagu Estate 08
FW 03680817	January 2020	RM 1,090.00	Bukit Sagu Estate 06
FW 03680970	September 2020	RM 1,185.68	Bukit Sagu Estate 06
FW 03681007	September 2020	RM 1,180.57	Bukit Sagu Estate 06

Besides, the work permits for the following contractors' workers were found expired.

Bukit Sagu Estate 06:

Permit No.:	Date Expiry
PE 7307682	16/04/2020
PE 7307759	12/03/2020

Corrections:	Provide the mechanism to monitoring compliance of employment for estate and contractor workers updated every month for immediate corrective action.
Root Cause Analysis:	i) The issue of contractors not paying work on public holidays and rest day at Bukit Sagu POM, Bukit Sagu 04 Estate and Bukit Sagu 06 Estate:

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	<p>No employment monitoring mechanism for contractor employees is implemented and the appointment responsible staff to monitoring and enforcing legal requirements to the contractor subsequently continuous communication is implemented with the contractor to convey information on compliance requirements.</p> <p>ii) The issue of workers did not achieve Minimum Wage Order 2020 at Bukit Sagu 08 Estate and Bukit Sagu 06 Estate:</p> <ol style="list-style-type: none"> a. Estate management does not use the new format of pay slip that separates basic salary income (minimum wage) and total gross salary that can show information of employees who do not reach minimum wages income. b. There is no mechanism to monitoring workers' wages every month for immediate action to workers who do not reach the minimum wages. c. Estate officers do not update employee income data on a weekly basis resulting in no action has taken to increase income and productivity in the next week to achieve the minimum wage. <p>iii) The issue of contractors' workers permit of works were found expired at Bukit Sagu Estate 06:</p> <p>Weaknesses in management in updating the copy of the contractor employee documentation. The employee is a legal employee and the working permit has been renewed by the contractor but a copy cannot be provided during the audit because the contractor working out of the area to submit a copy of the permit.</p>
Corrective Actions:	<p><u>Bukit Sagu POM, Bukit Sagu Estate 04 and Bukit Sagu Estate 06:</u></p> <ol style="list-style-type: none"> 1. Provide a summary of wages record format of the contractor's by monthly reviewed by the estate management as a mechanism to monitoring the employment of contractor in compliance with the law. 2. Appoint the responsible officers, to preparing monthly summary wages records for contractor employees and responsible to take action if it violates the law. 3. Issues a letter of instruction to the contractor for compliance with the Employment Act 1955 such as the employee's right to overtime pay, working day off, year leave, paid sick leave is complied with at the prescribed rate and makes payment of employee arrears. 4. Conduct regular meetings with contractors to improve communication to convey information that need to be complied with by the contractor. 5. Evaluate the performance of the contractor (half year / year) to assess the level of compliance and cooperation of the contractor in complying with all legal aspects required whether recommended for extension or termination of contract by the farm management to the Contract Procurement Department. 6. Proof of payment to employee salary repayment for the rate of payment of work on public holidays and rest day. <p><u>Bukit Sagu Estate 08 and Bukit Sagu Estate 06:</u></p>

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	<ol style="list-style-type: none"> 1. The Estate management issues a letter to all staff to uses new format of payslip that separates the basic income information (minimum salary) and the total gross salary. 2. Provide a record format of employee income summary each month to assess and monitor the income of employees who do not reach the minimum wage to appropriate action. 3. Management issues a letter of instruction to the employment officer to prepare a record of employee employment on a weekly basis for monitoring early action. 4. Provide training to increase staff knowledge related to legal compliance with the Minimum Wage Order 2020 and Employment Act 1955 to all estate management (Asst. Manager, Supervisor) by officers from Unit Penggajian Pekerja, Jabatan Tenaga Kerja FGVP Headquaters. 5. Implement repayment of the minimum wage balance to all employees involved. <p><u>Bukit Sagu Estate 06:</u></p> <ol style="list-style-type: none"> 1. Mechanism to monitoring by monthly for contractor employee management and review by estate management such as copy of passport, copy of work permit, license, employment, salary deduction, EPF, SOCSO, contract agreement <p>Complete the documentation for each contractor employee provided.</p>
Assessment Conclusion:	<p>Evidence of corrections and corrective actions verified:</p> <p><u>Bukit Sagu POM, Bukit Sagu Estate 04 and Bukit Sagu Estate 06:</u></p> <ol style="list-style-type: none"> 1. Summary of wages record format of the contractor's for month of November 2020 reviewed and signed by the estate managers 2. Letter of appointment dated 1/12/2020 for responsible officers in all operating units to prepare monthly summary wages records for contractor employees and responsible to take action if it violates the law. 3. Instruction memo to the contractor for compliance with the Employment Act 1955 such as the employee's right to overtime pay, working day off, year leave, paid sick leave is complied with at the prescribed rate and makes payment of employee arrears. 4. Meetings with contractors dated 10/12/2020 to improve communication to convey information that need to be complied with by the contractor. 5. Performance evaluation form for contractor (half year / year) to assess the level of compliance and cooperation of the contractor in complying with all legal aspects required whether recommended for extension or termination of contract by the farm management to the Contract Procurement Department. 6. Payslip record for month of November 2020 as proof of arrears payment to employee salary repayment for the rate of payment of work on public holidays and rest day. 7. Instruction letter dated 15/10/2020 by estates management to use new format of payslip that separates the basic income information (minimum salary) and the total gross salary.

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	<p>8. Excel spreadsheet record format of employee income summary for month of October and November 2020 for monitoring of income for employees who do not reach the minimum wage to appropriate action.</p> <p>9. Records of legal compliance with the Minimum Wage Order 2020 and Employment Act 1955 training conducted to all estate management (Asst. Manager, Supervisor) by officers from Unit Penggajian Pekerja, Jabatan Tenaga Kerja FGVPM Headquarters dated 1/12/2020</p> <p>Evidence of corrections and corrective actions taken confirmed the CAP proposed were effective to address the issue. Hence, Critical NC was closed on 17/12/2020.</p>
ASA4 verification	<p>Employment based on collective agreements as following:</p> <ul style="list-style-type: none"> - Estate employee work agreement terms & conditions based on the Collective Agreement; COG # 023/2020; Registered on 22/1/2020 between FGV Plantations (Malaysia) Sdn. Bhd. with Kesatuan Pekerja-Pekerja FGV Plantations (Malaysia) Sdn. Bhd. Semenanjung; Period: 1/1/2019 to 31/12/2021. - Collective Agreement; COG # 025/2020; Registered on 22/1/2020 between FGV Plantations (Malaysia) Sdn. Bhd. with Kesatuan Pekerja-Pekerja FGV Plantations (Malaysia) Sdn. Bhd. Semenanjung; Period: 1/1/2019 to 31/12/2021. <p>All the workers have signed on the employment contract or offer letter (local worker) prior to work. The contract available in local Bahasa Malaysia and English languages as well as workers' national language including Indonesian and Bangladeshi. All terms and conditions were clearly outlined in the contract and briefed to all the workers before they signed the contract during induction training. Sampled of the contracts sighted below.</p> <p>Bukit Sagu POM samples as per following:</p> <ul style="list-style-type: none"> - Employee # 20026; M; Crane Driver - Employee # 30152; F; GW - Operation - Employee # 30373; M; GW - Operation - Employee # 30428; F; GW - Operation - Employee # 30511; M; GW - Operation - Employee # 30548; F; GW - Operation <p>Bukit Sagu 4 Estate samples as per following:</p> <ul style="list-style-type: none"> - Employee # FW03301172; M; Harvester - Employee # FW03301399; M; GW - Operation - Employee # FW03301395; M; Harvester - Employee # FW03301374; M; Loader - Employee # FW03301147; M; GW - Operation - Employee # FW03301362; M; Quality Inspector <p>Bukit Sagu 6 Estate samples as per following:</p> <ul style="list-style-type: none"> - Employee # LW03680090; M; GW - Admin - Employee # FW03680962; M; GW - Operation - Employee # FW03680996; M; Harvester

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	<ul style="list-style-type: none"> - Employee # LW03680048; F; GW - Operation - Employee # FW03680945; M; Harvester - Employee # LW03680100; F; GW - Admin <p>Bukit Sagu 7 Estate samples as per following:</p> <ul style="list-style-type: none"> - Employee # LW04750002; M; Tractor Driver - Employee # LW04750045; M; Mandore - Harvesting - Employee # LW04750063; F; GW - Admin - Employee # LW04750065; F; GW - Admin - Employee # LW04750013; M; Mandore - GW - Employee # LW04750051; M; Lorry Driver <p>Bukit Sagu 8 Estate samples as per following:</p> <ul style="list-style-type: none"> - Employee # FW06290198; M; Harvester - Employee # FW06290966; M; GW - Operation - Employee # LW06290028; M; Mandore - Harvesting - Employee # LW06290073; F; GW - Admin - Employee # FW06290430; M; Collector – Loose Fruit - Employee # FW06290961; M; Harvester <p>Evidence of corrections and corrective actions taken confirmed the CAP proposed were effective to address the issue. Hence, Critical NC remained closed.</p>
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Non-conformity			
NCR Ref #	1966918-202009-M3	Date Issued	09/10/2020
Due Date	07/01/2021	Date of nonconformity Closure	17/12/2020
Clause & Category (Critical / Minor)	6.2.4 (Critical)		
Statement of Nonconformity:	Condition of the housing compound was unsatisfactory.		
Requirement Reference:	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.		
Objective Evidence:	<u>Bukit Sagu Estate 07:</u> During site visit to housing area found that the following issue: <ul style="list-style-type: none"> • House No.: BS7-RP-12/04 – drainage broken behind the house, septic tank cover was missing, drainage clogged. • House No.: BS7-RP-15/04 – contractor’s lorry was parking beside the house with oil spillage signage noted. Rubbish was scattered behind the house. Lubricant containers and chemical container were found kept outside the house. 		

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	<p>These issues were not captured in the line site inspection that last carried out on 3rd week of September 2020.</p> <p><u>Bukit Sagu Estate 04:</u> During site visit to housing area found that following issues:</p> <ul style="list-style-type: none"> • House No.: R.P 6/94 – Broken roof and trashes scattered in front the house. <p>Contractor ex-workshop – Used tyres, broken tractors and lorries, broken parts and empty chemical container were found in the line site area. Sign of burning and oil spillage was noted.</p>
Corrections:	Provide the mechanism to monitoring compliance of employment for estate and contractor workers updated every month for immediate corrective action.
Root Cause Analysis:	<ul style="list-style-type: none"> • The existing employee housing monitoring form provided is not comprehensive for more stringent housing environment monitoring for contractor housing. • Lack of enforcement and awareness among contractor employees in maintaining cleanliness and managing waste (chemical bins) according to proper methods, contractor vehicle and workshops that do not maintain cleanliness and environmental pollution control for waste produced and open burning prohibition.
Corrective Actions:	<ul style="list-style-type: none"> • Improvement of existing employee housing monitoring forms record by including environmental monitoring such as environmental cleanliness from garbage, drainage, chemical containers, work equipment and environmental pollution from vehicle oil spills and open burning. • Provide a designated place for contractor to parking vehicle for safety and manage to control pollution is implemented (machinery oil spill). • Conducting monitoring of employee housing using the latest format form and recommendations for corrective action taken in the form including for housing leased to contractors. • Launch a weekly hygiene and practice campaign program implemented by the estate management together with all staff and employees. • Discussions with the contractor for action to disposal of the construction of existing workshop within a specified period of planning. <p>Directing contractors to carry out cleaning and waste disposal work to control environmental pollution in residential areas and vehicle workshops</p>
Assessment Conclusion:	<p>Evidence of corrections and corrective actions verified:</p> <ul style="list-style-type: none"> • Visit to respective housing areas to see improved conditions • Sample housing inspection records dated 15/11/2020 using improved inspection form • Layout plan of housing area for contractor to park vehicle safely and cleanly • Records of hygiene and practice campaign program implemented by the estate management together with all staff and employees dated 1/12/2020. • Records of discussions with the contractor for action to disposal of the construction of existing workshop within a specified period of planning. • Instruction memo to contractors dated 10/10/2020 to carry out cleaning and waste disposal work to control environmental pollution in residential areas and vehicle workshops

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	Evidence of corrections and corrective actions taken confirmed the CAP proposed were effective to address the issue. Hence, Critical NC was closed on 17/12/2020.
ASA4 verification	Adequate housing and facilities sufficiently provided by the company with upkeep of facilities were evidence as per sample Bukit Sagu POM latest housing inspection date: 31/10/2021 by Mr. Zoofrazer, General Clerk and approved by Mr. Ramdan Hashim, Executive Assistant. Previous inspection was on 16/10/2021 & 2/10/2021. Sample Bukit Sagu 7 Estate housing inspection latest dated 11/3/2021 as per records of Pemeriksaan Kawasan Perumahan Dan Asrama FGV Bukit Sagu 07 Tahun 2021. Evidence of corrections and corrective actions taken confirmed the CAP proposed were effective to address the issue. Hence, Critical NC remained closed.

Non-conformity			
NCR Ref #	1966918-202009-M4	Date Issued	09/10/2020
Due Date	07/01/2021	Date of nonconformity Closure	17/12/2020
Clause & Category (Critical / Minor)	3.4.3 (Critical)		
Statement of Nonconformity:	The social and environmental management and monitoring plan found insufficiently implemented, reviewed and updated regularly		
Requirement Reference:	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		
Objective Evidence:	<u>Bukit Sagu 08 Estate:</u> Based on the Environmental Impact Assessment Report for Proposed Development of Unplanted Area Covered About 61.54 Hectares into Oil Palm Plantation in Ladang Felda Global Ventures Plantation Malaysia Sdn. Bhd. (FGVPMSB) Bukit Sagu 8, Kuantan, Pahang, the environmental management and monitoring plan as per required mitigation measures identified from the assessment were found insufficiently implemented, reviewed and updated regularly for impacts mainly in land preparation, field establishment and post development stages.		
Corrections:	Implement the mitigation action as recommended in EIA Report for the new development area.		
Root Cause Analysis:	The Estate management does not appoint an environmental officer who is responsible for helping to monitor the environmental action plan for the new planting work approved because based on the letter from DOE stating that there is no need to implement the plan.		
Corrective Actions:	<ul style="list-style-type: none"> • Appoint of an environmental officers at the estate management level to carry out monitoring of new development work based on the EIA plan and the development schedule implemented. • The Department of Sustainability Headquarters will issue a letter to the Operations Department FGVP of the replanting unit to provide views and advisory services related to EIA requirements before new development work begins. 		

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	Prepare an environmental action plan and update information on the progress of development work carried out every 6 months.
Assessment Conclusion:	<p>Evidence of corrections and corrective actions verified:</p> <ul style="list-style-type: none"> • Visit to respective areas to see implemented mitigation actions completed • Letter of appointment dated 15/10/2020 for monitoring of action plans • Memo by HQ Department of Sustainability dated 15/10/2020 to Operations Department FGVPD for advisory services related to new development • Updated environmental action plan dated 15/10/2020 for progress in new development area <p>Evidence of corrections and corrective actions taken confirmed the CAP proposed were effective to address the issue. Hence, Critical NC was closed on 17/12/2020.</p>
ASA4 verification	Implementation and monitoring of the mitigation measures as identified in the Environmental Impact Assessment Report for Proposed Development of Unplanted Area were adequately continued. No recurrence of non-conformity observed. Thus, the NCR remains closed.

Non-conformity			
NCR Ref #	1966918-202009-N1	Date Issued	09/10/2020
Due Date	11/11/2021	Date of nonconformity Closure	14/10/2021
Clause & Category (Critical / Minor)	2.3.2 (Minor)		
Statement of Nonconformity:	Not all required information for indirectly sourced FFB had been collated.		
Requirement Reference:	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.		
Objective Evidence:	<p><u>Bukit Sagu POM:</u></p> <p>Information on geo-location of FFB origins, evidence of ownership status for all the indirectly sourced FFB suppliers was not available.</p>		
Corrections:	Updating actions based on the action plan issued by the FFB Purchase Department headquarters for the completed collect of information required for all FFB suppliers provided.		
Root Cause Analysis:	The action to preparing the geolocation information, MPOB license and verification of land ownership status from indirect FFB suppliers such as dealers / external supplier is conduct by the FFB Purchase Department at the headquarters in stages of progress.		
Corrective Actions:	<ul style="list-style-type: none"> • Refer to the FFB Purchase Department headquarters for information collection status from indirect suppliers provided. • Updating filing information for supplier geolocation, MPOB license and land ownership verification for all FFB suppliers. 		
Assessment Conclusion:	CAP has been accepted. Evidence of effectiveness to be verified during next coming assessment.		

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ASA4 verification	<p>Despite the certification unit has 3 years from November 2019 to obtain the information, the CU has prepared the following evidence:</p> <ol style="list-style-type: none"> 1) A memo from the CEO of FGV Trading Sdn Bhd dated 04/10/2021 [ref.: (05/2021) CEOFGVTSB/General] to all the external FFB suppliers about the latest update of FFB Sales & Purchase Agreement, where suppliers are required to fill in the FFB Supply Application Form and provide the supporting documents 2) Template of the FFB Supply Application Form that shows the information about name & address of the FFB suppliers, MPOB license No., GPS coordinates of the plantation, plantation size & age of palms is required. Apart from that copies of supporting documents such as right to use land document and MPOB license are also required. <p>The evidence were found to be adequate to close the NCR. Continuous effective implementation of the corrective action shall be verified in the next assessment visit.</p>
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Non-conformity			
NCR Ref #	1966918-202009-N2	Date Issued	09/10/2020
Due Date	11/11/2021	Date of nonconformity Closure	14/10/2021
Clause & Category (Critical / Minor)	3.3.2 (Minor)		
Statement of Nonconformity:	Sighted the mechanism check consistent implementation of procedure was not in place.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<ul style="list-style-type: none"> • Found the implementation of SOP Prosedur Kerja Selamat (Prosedur Menarik Pasir Di bawah Dapur Boiler) SOP No. FPI-PK-108 dated 4/4/2017 was not been followed such as not using Hi-Cut Safety shoes, apron and face shield was sighted during site visit. • SOP; FGVPM/L3/GPK-010 dated 1/2/2020 under 6.3.1.4 To ensure workers wearing a suitable PPE was not been followed in BS04, sighted spraying workers was not wearing goggle during spraying. • In BS08, SOP; FGVPM/L3/GPK-011 dated 1/2/2020 under point 6.1.2 to give and ensure PPE was wear and in good condition was not been followed, sighted workers not wearing proper mask during fertiliser application. 		
Corrections:	Action to ensure that all employees are protected by safety while doing work with the identification of PPE recommendations properly supplied and used by employees while working.		
Root Cause Analysis:	<ul style="list-style-type: none"> • During field visits, the condition of the boiler kitchen door is not tightly close causing a risk of fire sparks to employees who require specific risk control assessments and specific maintenance control measures or PPE. The SOP reference stated by the auditor is related to the work of pulling sand under the boiler which is not a routine work only carried out once a week, therefore the PPE stated is not the main requirement of PPE for the entire work at the boiler station because of the low risk if the boiler door is tightly closed. 		

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	<ul style="list-style-type: none"> • Spraying workers have been provide with complete PPE equipment including goggle eye protection, inappropriate PPE goggle condition disturbs vision (foggy) which makes it difficult for working. • All fertilizer workers were provided with PPE mask N95 and evidence was recorded, during the field visits the workers carried two types of PPE with is mask N95 and face mask are always worn for infectious disease control. There were two employees wearing face masks who did not replace with PPE N95 masks because they felt that the PPE was sufficient to be used for the job.
<p>Corrective Actions:</p>	<p>Issue of implementation of SOP at Bukit Sagu POM:</p> <ul style="list-style-type: none"> • POM management needs to carry out a review of HIRADC risk assessment for work activities at boiler stations for determination of control while boiler kitchen door repair work is fully implemented. • Carry out boiler door repair maintenance to reduce the risk to boiler workers in compliance with the prescribed work SOP. • Record of risk control training and provision of PPE to boiler staff before repair work is completed. <p>Issue of implementation of SOP at Bukit Sagu 04:</p> <ul style="list-style-type: none"> • The estate management conduct a re-evaluation of the PPE equipment supplied for the investigation of workers' grievances related to PPE causing discomfort and disruption of work is carried out and then temporary action is taken as appropriate until it is taken full action. • The estate management supplies suitable goggle eye protection and has been tested by workers can be used without disturbing vision (foggy). <p>Issue of implementation of SOP at Bukit Sagu 08:</p> <ul style="list-style-type: none"> • Prepare a checklist that will be implemented by the officer before starting work to ensure that all employees wear the recommended PPE. • The action of issuing a reminder letter to the officer for enforcement instructions and ensuring that the employee wears a complete PPE as recommended
<p>Assessment Conclusion:</p>	<p>CAP has been accepted. Evidence of effectiveness to be verified during next coming assessment.</p>
<p>ASA4 verification</p>	<p>The following evidence were verified:</p> <p>Bukit Sagu POM:</p> <ol style="list-style-type: none"> 1) Pictures that show the boiler doors have been repaired 2) Latest updated HIRADC that shows the risk assessment for boiler operation has been revised 3) Attendance record of PPE usage training <p>Bukit Sagu 04:</p> <ol style="list-style-type: none"> 1) Pictures that show the difference between the new and old safety goggle 2) PPE issuance records that show the new type of goggle has been provided to the sprayers

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	<p>Bukit Sagu 08:</p> <ol style="list-style-type: none"> 1) Latest checklist of PPE for manuring operation that shows the field supervisors are checking the usage of PPE by the workers 2) Reminder letter dated 27/10/2020 [ref.: (05)/FGVPM/100/629/10-1-05] that shows the PIC has been reminded about the importance of wearing complete PPE during manuring <p>The evidence were found to be adequate to close the NCR. Continuous effective implementation of the corrective action shall be verified in the next assessment visit.</p>
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Non-conformity			
NCR Ref #	1966918-202009-N3	Date Issued	09/10/2020
Due Date	11/11/2021	Date of nonconformity Closure	14/10/2021
Clause & Category (Critical / Minor)	7.11.3 (Minor)		
Statement of Nonconformity:	Engagement with adjacent stakeholders on fire prevention and control measures was insufficient		
Requirement Reference:	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.		
Objective Evidence:	Evidence that the unit of certification engages with adjacent stakeholders on fire prevention and control measures were not available		
Corrections:	Enhancing communication with stakeholders for integrated action to prevent open burning activities and joint control actions need to be implemented.		
Root Cause Analysis:	There should be a meeting program with all FFB suppliers implemented at the POM and estate level but it was postponed due to movement control and prevent infectious diseases by government.		
Corrective Actions:	<ul style="list-style-type: none"> • POM and estate management will implement appropriate methods in providing information related to fire prevention action plans to nearby stakeholders and FFB suppliers using registered mail or email. • Obtain a copy of the signature of the joint commitment from all stakeholders and FFB suppliers involved in the Plan of control measures and fire prevention in agricultural practices. 		
Assessment Conclusion:	CAP has been accepted. Evidence of effectiveness to be verified during next coming assessment.		
ASA4 verification	The certification unit has established a " <i>Pelan Pengurusan Kebakaran Ladang FGVPM Bukit Sagu</i> " 04/06/07/08 dated 20/10/2020. The plan includes potential fire outbreaks (such as fire at office, housing areas and fields) and Action Plan & Control Measures. The Plan has been communicated to all stakeholders as stated in the memo dated 20/10/2020 undersigned by each Estate Manager. E.g. at Bukit Sagu 04 Estate, sighted the memo dated 12/01/2021 addressed to Kuari Tinjau Makmur and Ladang RISDA Cherul mentioning Bukit Sagu 04 Estate's commitment towards zero burning and request the mentioned neighbours not to conduct any		

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	<p>open burning at their premises without permission from DOE for better management of the environment.</p> <p>The evidence were found to be adequate to close the NCR. Continuous effective implementation of the corrective action shall be verified in the next assessment visit.</p>
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Opportunity for Improvement – NA	
OFI#	Description
OFI 1	<p>OFI Statement:</p> <p>Verification / Follow-up actions:</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1525351-201708-M1	Major	6.1.3	07/09/2017	Closed out on 13/11/2017
1525351-201708-M2	Major	6.5.2	07/09/2017	Closed out on 13/11/2017
1525351-201708-M3	Major	2.1.1	07/09/2017	Closed out on 13/11/2017
1525351-201708-N1	Minor	6.2.3	07/09/2017	Closed out on 30/11/2018
1525351-201708-N2	Minor	4.6.10	07/09/2017	Closed out on 30/11/2018
1525351-201708-N3	Minor	1.1.1	07/09/2017	Closed out on 30/11/2018
1525351-201708-N4	Minor	5.4.1	07/09/2017	Closed out on 30/11/2018
1525351-201708-N5	Minor	4.8.2	07/09/2017	Closed out on 30/11/2018
1525351-201708-N6	Minor	5.1.2	07/09/2017	Closed out on 30/11/2018
1525351-201708-N7	Minor	5.1.3	07/09/2017	Closed out on 30/11/2018
1525351-201708-N8	Minor	5.2.4	07/09/2017	Closed out on 30/11/2018
1525351-201708-N9	Minor	2.1.3	07/09/2017	Closed out on 30/11/2018
1712266-201810-M1	Major	2.1.1	30/11/2018	Closed out on 14/10/2019
1712266-201810-N1	Minor	4.7.6	30/11/2018	Closed out on 14/10/2019
1712266-201810-N2	Minor	6.11.2	30/11/2018	Closed out on 14/10/2019
1838950-201906-M1	Major	6.5.1	18/10/2019	Closed out on 23/12/2019
1838950-201906-M2	Major	6.5.2	18/10/2019	Closed out on 23/12/2019
1838950-201906-N1	Minor	6.5.3	18/10/2019	Closed out on 05/10/2020
1838950-201906-N2	Minor	4.7.3	18/10/2019	Closed out on 05/10/2020
1838950-201906-N3	Minor	4.7.5	18/10/2019	Closed out on 05/10/2020

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1838950-201906-N4	Minor	5.3.3	18/10/2019	Closed out on 05/10/2020
1966918-202009-M1	Critical	2.3.1	09/10/2020	Closed out on 17/12/2020
1966918-202009-M2	Critical	6.2.1	09/10/2020	Closed out on 17/12/2020
1966918-202009-M3	Critical	6.2.4	09/10/2020	Closed out on 17/12/2020
1966918-202009-M4	Critical	3.4.3	09/10/2020	Closed out on 17/12/2020
1966918-202009-N1	Minor	2.3.2	09/10/2020	Closed out on 14/10/2021
1966918-202009-N2	Minor	3.3.2	09/10/2020	Closed out on 14/10/2021
1966918-202009-N3	Minor	7.11.3	09/10/2020	Closed out on 14/10/2021
2117390-202110-M1	Critical	7.10.1	14/10/2021	Closed out on 08/02/2022
2128849-202111-M1	Critical	3.6.1	11/11/2021	Closed out on 08/02/2022
2117390-202110-N1	Minor	7.3.1	14/10/2021	Open
2128849-202111-N1	Minor	7.3.2	11/11/2021	Open

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 Bukit Sagu Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

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

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

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)
New mother	Bukit Sagu POM General Clerk	Face to face interview
Local worker/Union representative	- Bukit Sagu POM Store Assistant - Bukit Sagu 8 Estate Supervisor	Face to face interview
Gender committee	Bukit Sagu POM General Clerk	Face to face interview
Spare part suppliers	Azru Enterprise	Face to face interview
Estate contractors	- Sri Chakra Enterprise - Mahu Berjaya Enterprise	Face to face interview
Community nurse (Government Clinic)	Klinik Desa Bukit Sagu 6	Face to face interview
Children nursery assistant (Government nursery)	Tadika Bukit Sagu 6	Face to face interview
Estate canteen & sundry shop owners	Impian Jaya Shop Bukit Sagu 6 Estate	Face to face interview
Village representative	Bukit Sagu 7 HEP Clerk	Face to face interview
Grocery shop keeper	Mini Market Bukit Sagu 7 Estate	Face to face interview
Estates' foreign workers' representative	Sprayer & General Worker	Face to face interview

Stakeholders comment	
1	Feedbacks: Community nurse (Government Clinic) Estate management assisted in repair and/or maintenance of clinic buildings which located within estate.

	<p>Audit Team verification and response: No further issue</p>
2	<p>Feedbacks: Children nursery assistant (Government nursery) Estate management assisted in upkeep of nursery surrounding area.</p>
	<p>Audit Team verification and response: No further issue</p>
3	<p>Feedbacks: Spare part suppliers & contractors No issue in pricing and payment with both FGV mill and estates. Have long business relationship.</p>
	<p>Audit Team verification and response: No further issue</p>
4	<p>Feedbacks: Mill and estates workers Generally, they have a good understanding about RSPO requirements. Most of them have been working for the company for a long time and feel that the company has treated them better over time in line with the terms and conditions stipulated in the employment contract. Occupational safety is also well taken care by the management. They also know about the complaint procedure and so far, the response to their complaints were prompt. There is no restriction for them to join trade union or other association.</p>
	<p>Audit Team verification and response: No further issue</p>
5	<p>Feedbacks: New mothers All women employees in FGV mill and estates entitled for maternity leave from 60 to 90 days for 5 children. New mothers provided with private room in office for breast milk pumping during office hours. Field workers if required can use nursery for estate toddlers for breast feed babies during working hour. New mother also allowed to take time off in case need to attend babies vaccination appointment without annual leave or salary deduction.</p>
	<p>Audit Team verification and response: No further issue</p>
6	<p>Feedbacks: Gender committee representative Female employees among workers and staff all involve in gender committee activities except during MCO. Female family members of male employees also invited to join gender committee programs and they participated well except during MCO. No issue of work or domestic violence and harassment including sexual harassment occurred and reported in all FGV estates and mill in Bukit Sagu.</p>
	<p>Audit Team verification and response: No further issue</p>
7	<p>Feedbacks: Local workers/Union representatives All local workers and staff will be automatically entitled to join FGV workers and staff union as members upon confirmation of employment. Representatives from each estate and mill will be selected by members through voting on tri-annual basis. Selected representatives will be allowed to attend annual nationwide union meeting as official event without need to take annual leave.</p>
	<p>Audit Team verification and response:</p>

	No further issue
8	<p>Feedbacks: Estate foreign workers representatives Foreign workers are encouraged to join FGV workers union as members so can participate in its programs and events. Not many interested however but foreign workers at individual estate still have a coordination committee for bargaining with management at estate level. Furthermore, all entitlement as per legal Minimum Wage Order and Employment Act also received by foreign workers.</p> <p>Audit Team verification and response: No further issue</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
Not applicable as the certification unit has undergone second cycle of replanting.					

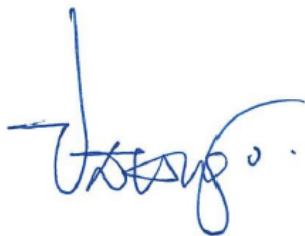

Previous land owner / user comment – NA	
	<p>Feedbacks:</p> <p>Audit Team verification and response:</p>

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.

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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Bukit Sagu Palm Oil Mill 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 Bukit Sagu Palm Oil Mill is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
<p>Name: Valence Shem</p>	<p>Name: NOROLSAIFUL HAZRI BIN HAMID</p>
<p>Company Name: BSI Services (M) Sdn Bhd</p>	<p>Company Name: FGV HOLDINGS BERHAD</p>
<p>Title: Lead Auditor</p>	<p>Title: SUSTAINABILITY MANAGER</p>
<p>Signature:</p> 	<p>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></p> 
<p>Date: 28/02/2022</p>	<p>Date: 02 MAR. 2022</p>

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. - Critical (Major) compliance -</p>	<p>FGV has established SOP for information request from relevant stakeholders and documented in '<i>Komunikasi, Penglibatan dan Rundingan</i>' with Doc. No.: FGV/ML-1A/L2-Pr12 dated 01/06/2016. The objective of the SOP is to establish an effective system for communication between company and stakeholder.</p> <p>List of documents that made available upon request are as below:</p> <ol style="list-style-type: none"> 1. Minutes meeting 2. Complaint report 3. Land title 4. Safety and Health Plan 5. HCV report 6. Stakeholder list 7. SEIA assessment report and management plan 8. Policies 9. And etc. <p>Besides, Bukit Sagu Estate 07 and Bukit Sagu Estate 08 has issued memo dated 14/01/2020 and 03/02/2020 to relevant stakeholders to inform them regarding the publicly available documents that could be access by them.</p>	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	Information provided in both English and Bahasa Malaysia and accessible to all stakeholders in FGV Bukit Sagu Certification Unit upon request. Policies	Complied

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	- Minor compliance -	& guidelines were available in the company's website: https://www.fgvholdings.com/sustainability/policies-guidelines/ .	
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Bukit Sagu POM and all estates has maintained the requests information and responses in both files and record books. Sighted sample requests and responses received as following:</p> <ul style="list-style-type: none"> - Bukit Sagu 4 Estate: Proposal to upgrade road access by Tinjau Makmur Sdn. Bhd. Quarry Premise; Letter date: 30/9/2021; Response letter by Bukit Sagu 4 Estate Ref. # (02)330/Kuari; Date: 6/10/2021 - Bukit Sagu 8 Estate: Request to borrow grass cutting machine by Persatuan Belia (MBFM) Felda Bukit Sagu 2; Letter Ref. # MBFM/SAGU2/002/s.k(84); Date: 18/3/2021; Response by Bukit Sagu 8 Estate date: 18/3/2021 	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>FGV has developed procedure of '<i>Komunikasi, Penglibatan dan Rundingan</i>' with Doc. No.: FGV/ML-1A/L2-Pr12 dated 01/06/2016. The objective of the SOP is to establish an effective system for communication between company and stakeholder. The stakeholders have been briefed on the procedure during stakeholder meeting and internal training. Assistant Manager of Bukit Sagu 07 Estate and Bukit Sagu Estate 08 has been appointed as Communication Officer and appointment letter dated 05/08/2020 and 04/02/2020 was sighted.</p> <p>Meeting with FFB suppliers among Felda Settlers was conducted on 23/4/2041 in Bukit Sagu POM. The meeting mainly function as a channel to discuss issue related to FFB quality supplied by Felda Settlers to Bukit Sagu POM and other matters. Seen the attendance list and no issue was reported during the meeting.</p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>Stakeholder list has been updated accordingly with the contact and details of stakeholder. The list has included government authorities, contractors, local communities, and suppliers.</p>	Complied

Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	Policy for ethical conduct in place is established as FGV Group Sustainability Policy (Policy # FGV/SED/POL/001; Rev. 4.0; Effective date: 17/11/2020) in English and Bahasa Malaysia. The policy has detailing the responsibility and compliance to the policy and FGV's commitment to sustainability. Besides, Code of Business Conduct and Ethics (CoBCE) for Employees (Policy # FGV/GHR/POL/039; Rev. 4.0; Effective date: 1/1/2020) was established which incorporated various aspect of committing to a code of ethical conduct and integrity. Supplier Code of Conduct was available in the company's website (Doc. Version: 01/05/2020) which outlined the business ethics & integrity for all the suppliers with FGV Holdings Berhad. The policies have been briefed to all workers as per sample sighted by Bukit Sagu POM on 1/3/2021 and on 20/4/2021 by Bukit Sagu 4 Estate.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Policy implementation and monitoring of the compliance of the policy was conducted through agreement and the Supplier Code of Conduct (SCOC). Sampled the SCOC for contractors as below: - Sri Cakra Enterprise - Nalar Gemilang Enterprise - Sebertak Auto Trading - Gerimis Indah Enterprise - Greenverse Sdn. Bhd.	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	The CU continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Among the evidence of compliance verified are as follows:	Complied

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		<p><u>BSPOM</u></p> <ul style="list-style-type: none"> - MPOB License #500202104000, valid until 31/03/2022 - CF for UPV, #PMT-PH/21 39071, valid until 17/04/2022 - Permit to store diesel, #C001796, valid until 08/04/2024 - Permit to extract water source, #0067, valid until 31/12/2021 - Bukit Sagu POM: JTK Salary deduction permit; Serial no. PP 3/34/1385; Date: 28/1/2009 <p><u>BS04</u></p> <ul style="list-style-type: none"> - MPOB License #558968002000, valid until 28/02/2022 - Permit to store diesel, #C002547, valid until 04/09/2024 - Competent Person for Scheduled Wastes Management, #CePSWaM/04758, dated 29/06/2021 <p><u>BS06</u></p> <ul style="list-style-type: none"> - MPOB License #559597002000, valid until 31/03/2022 - Permit to store diesel, #PHG/PD/K/9/87, valid until 06/08/2024 <p><u>BS07</u></p> <ul style="list-style-type: none"> - JTK authorization letter ref. # (22) dlm BHG .PU/9/129 Jld 23 dated 26/4/2016 for workers' salary deduction of electricity, water and medical - MPOB License #559045002000, valid until 28/02/2022 	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	The mechanism is guided by Manual Procedure, Perundangan Dan Lain-Lain Keperluan Kawalan (Legal and Other Requirements) [FPI/L2/QOSHE-2.0]. The Assistant Mill and/or Estate Managers are the persons responsible to	Complied

	<p>- Minor compliance -</p>	<p>conduct the evaluation of compliance. In the legal register there is a column to record the status of compliance and it was done by the assistant managers. The report of status of compliance helps the management to get the information about non-compliance with legal requirement (if any) and subsequently take the necessary action.</p>	
<p>2.1.3</p>	<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><u>Bukit Sagu POM</u> Bukit Sagu POM boundaries from Felda Bukit Sagu 2 is clearly demarcated with security fences. The fences are well maintained and visible. The mill is located on its own land with the land title (No. H.S.(D): 17995; Lot Number: PT 1129) owned by Felda Palm Industries available for verification.</p> <p><u>Bukit Sagu 4 Estate</u> Bukit Sagu 4 Estate boundaries from Bukit Sagu 7 Estate, Bukit Sagu 2 Estate, Terengganu State Boundary Reserve and Forest Reserve. Visit to the boundary stone (004° 02'44" N, 103° 08'59" E) at the estates boundary with Terengganu State Boundary Reserve indicated that the boundary markers were well established and fences were erected to clearly demarcate the boundaries. There were no plantings beyond the boundary stone and fences.</p> <p><u>Bukit Sagu 6 Estate</u> Visit to the Forest Reserve boundary to the estate showed that there were clear security trenches and electric fence established along the boundary. There were no traces of encroachment into the forest reserve.</p> <p><u>Bukit Sagu 7 Estate</u></p>	<p>Complied</p>

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		Visit to the estate boundary to Ladang Berdikari showed that there were clear security trenches and boundary markers (003° 58'46" N, 103° 06'14" E) established along the boundary. A buffer has been established along the boundary as well.	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	List of contracted parties maintained in the stakeholder register as per sample sighted for FGV Bukit Sagu POM that has maintain record of contractors in FGV system, eDaftar and summary of the contractors and suppliers in stakeholder list which was last updated on 3/4/2021. Bukit Sagu 8 Estate updated its list on 26/2/2021, Buit Sagu 7 Estate on 5/8/2021, Bukit Sagu 6 Estate on 7/1/2021 and Bukit Sagu 4 Estate on 1/1/2021.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	Contract contain specific clauses on meeting applicable legal requirements including FFB suppliers as per sample as following: - FFB Supplier: Mutiara Sulaman Sdn. Bhd.; FFB purchase offer letter ref. # (44)FGVTSB/FFBPD/HQ/01; Date: 11/3/2020 - Contractor: Sri Chakra Enterprise; Supplier Code of Conduct (SCOC) Doc. # FGV/PROC/NEW/003; 1/1/2021 - Contractor: Sebertak Auto Trading; Supplier Code of Conduct (SCOC) Doc. # FGV/PROC/NEW/003; 16/4/2021 Evidence of legal due diligence of contracted parties available as per SCOC sighted.	Complied
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. - Minor compliance -	All contracts including FFB supply has been attached with signed Supplier Code of Conduct (SCOC) Doc. # FGV/PROC/NEW/003 which contain clauses disallowing child, forced and trafficked labour as well as a clause for protection of young workers if they are employed.	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			

2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>Verified list of direct sourced FFB supply to FGVPISB Bukit Sagu Palm Oil Mill. The Palm Oil Mill management managed to obtain the required information from the directly sourced FFB supplier. The information contains details such as:</p> <ul style="list-style-type: none"> - Source of FFB - Address of plantation/dealer - MPOB license and Validity - Coordinate and size of plantation 	Complied										
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>The CU is in the process of completing in obtaining the evidence listed in Indicator 2.3.1 of all its indirectly sourced FFB.</p>	Complied										
<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>													
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>FGVPISB Bukit Sagu POM has documented an annual business plan in the form of annual budget and the projection for 5 years (until 2026) prepared as guidance for future planning. The business plan contains the information about FFB processed, Estimated CPO Price, Estimated PK Price, Estimated Shell Price, Estimated Sludge Oil Price.</p> <p>The sampled estates have documented an annual business plan in the form of an annual budget and the projection for 3 years prepared as a guidance for future planning. The business plan contains Projected Crop, Maintenance & Supervision, General Charges and Financial Cost.</p>	Complied										
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>An annual replanting programme is available projecting the proposed replanting programme from 2021 to 2026. The programme is as follows:</p> <table border="1" data-bbox="1048 1299 1904 1394"> <tr> <td data-bbox="1048 1299 1220 1347">Year</td> <td colspan="4" data-bbox="1220 1299 1904 1347">Ha to be replanted</td> </tr> <tr> <td data-bbox="1048 1347 1220 1394"></td> <td data-bbox="1220 1347 1391 1394">BS04</td> <td data-bbox="1391 1347 1561 1394">BS06</td> <td data-bbox="1561 1347 1731 1394">BS07</td> <td data-bbox="1731 1347 1904 1394">BS08</td> </tr> </table>	Year	Ha to be replanted					BS04	BS06	BS07	BS08	Complied
Year	Ha to be replanted												
	BS04	BS06	BS07	BS08									

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		2021	0	260.74	273.65	0	
		2022	320.95	235.91	490.79	117.63	
		2023	0	250.56	0	0	
		2024	0	0	0	0	
		2025	0	392.59	0	0	
		2026	0	358.04	0	0	
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>FGVPISB Bukit Sagu POM’s Management Review is done annually and was last conducted on 06/09/2021. It was chaired by the Mill Manager, and attended by 12 key personnel which includes AMs, staffs, office clerk, lab analyst, weighbridge clerk, etc.</p> <p>Based on the minutes of meeting, the following agendas were adequately recorded:</p> <ul style="list-style-type: none"> • Internal Audit Report • Environmental aspect • SIA action plan • Production • Follow up action from previous management review • Safety & Health • Continual improvement manual • Other business <p>The sampled estates Management Review meetings were done annually and were last conducted in September 2021. It was chaired by the</p>					Complied

		<p>respective Estate Managers, and attended by key personnel which includes AMs, staffs, office clerks, etc.</p> <p>Based on the minutes of meeting, the following agendas were adequately recorded:</p> <ul style="list-style-type: none"> • Internal Audit Report • Customer satisfactory • Production • Environmental aspect • SIA action plan • Replanting • Changes that could affect the management 	
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Action plan for continual improvement has been implemented, based on a consideration of the main social and environmental impacts and opportunities.</p> <p>Continuous improvement plan of main social impacts including following:</p> <ul style="list-style-type: none"> - Improvement of workers working and living facilities - Annual budget allocation of workers housing improvement - Improvement workers medical coverage provision - Community contribution programs 	<p>Complied</p>
<p>3.2.2</p>	<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>Bukit Sagu POM Certification Unit has filled its RSPO metrics template version 2.1 and submitted to the CB prior to this assessment. Based on verification through various documents such as land titles, JKKP report, employees register, computer software recording system, to name a few, the data reported in the metrics template were found to be accurate.</p>	<p>Complied</p>

	<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>Documented Standard Operating Procedures (SOPs) for FGVPI SB Bukit Sagu POM were available and maintained in a file. There were 141 SOPs [doc. No.: FPI/L3/1-01 to FPI/L3/16-01] in total which covered the entire operation of the mill including administration. The SOPs were established on 02/01/2001 and last updated on 23/10/2017.</p> <p>For the estates, "<i>Manual Ladang Sawit Lestari</i>" (Oil Palm Plantation Sustainability Manual) is in place.</p>	<p>Complied</p>
<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>FGVPISB has established mechanism to check the consistency of procedure established such as 'Ketua Zon' visit, RC visit, internal audit or internal request email. Sighted the 'Ketua Zon' visit report recorded in the Management Visit logbook.</p> <p>Mechanism to check consistent implementation of procedure is through Internal Audit, Mill Advisor and Regional compliance unit Visit. Internal Audit is planned twice a year by Sustainability Department, refer to internal audit carried out at specific operating units</p> <p><u>Bukit Sagu POM</u></p> <ol style="list-style-type: none"> Internal Audit was conducted on 12 – 15 July 2021 at the mill, obtaining a score of 8/10 (Good). All raised non-conformities were addressed and closed. <p><u>Bukit Sagu 4 Estate</u></p>	<p>Complied</p>

		<ol style="list-style-type: none"> 1. Internal Audit was conducted remotely on 12 – 15 July 2021 at the estate. There were no findings arising from the remote audit. 2. Quarterly Performance Yield Analysis is conducted by the Agronomist to monitor the procedures and agricultural practices are implemented in a productive manner. Performance Yield Analysis Q2 2021 & Performance Yield Analysis Q3 2021 was available for verification. 3. Agronomist Visit was conducted on 06/07/2021 by FGV Agri Services at the estate. <p><u>Bukit Sagu 6 Estate</u></p> <ol style="list-style-type: none"> 1. Regional Controller has visited the estate on 15/09/2021 and the visit report available for verification. 2. Internal Audit was conducted remotely on 12 – 15 July 2021 at the estate. All raised non-conformities were addressed and closed. <p><u>Bukit Sagu 7 Estate</u></p> <ol style="list-style-type: none"> 1. Internal Audit was conducted remotely on 12 – 15 July 2021 at the estate. All raised non-conformities were addressed and closed. <p><u>Bukit Sagu 8 Estate</u></p> <ol style="list-style-type: none"> 1. Internal Audit was conducted remotely on 12 – 15 July 2021 at the estate. All raised non-conformities were addressed and closed. 	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>The practices consistently monitored by mill and plantation advisors and recommendations for improvements are given to maintain the sustainable practices. Mill advisor, Operation Technical Officer, Regional General Manager visits the operating units to ensure implementations of procedures are consistent.</p>	Complied

Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the SIA assessment conducted by Sustainability Compliance and Certification Department (SCCD) on 19/09/2019 in Bukit Sagu POM, 18/09/2020 in Bukit Sagu Estate 07, 18/09/2020 in Bukit Sagu Estate 08, 17/9/2019 in Bukit Sagu Estate 04 and 17/09/2020 in Bukit Sagu Estate 06, the aspects that have been assessed are such as economy impact to workers, contracts and local communities, socio-culture. Positive and negative impacts were identified. Methodology of the assessment is based on stakeholder interview, document review and site visit. Issues raised during the assessment will be further discuss and analysed. Total 25 stakeholders have been sampled to participate in the assessment.</p>	Complied
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Management Plan for negative social impacts was developed in Bukit Sagu POM, Bukit Sagu Estate 07 with the detail timeframe to mitigate the impacts. The last review was conducted on 22/09/2020 in Bukit Sagu POM, 11/09/2020 in Bukit Sagu Estate 07, 06/10/2020 in Bukit Sagu Estate 08, 14/06/2020 in Bukit Sagu Estate 04 and 17/9/2020 in Bukit Sagu Estate 04.</p>	Complied
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Latest review of management action plan done through online and emailed stakeholder consultation in place of face to face meeting that was unable to be conducted due to COVID-19 Movement Control Order enforced by the government. No negative feedback received from stakeholders consulted.</p>	Complied
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>FGV has developed SOP for '<i>Proses Sosialisasi & Temuduga</i>' with Doc. No.: FGV/JTK/POL/001 for recruitment of foreign workers and '<i>Perlantikan PBH (Pekerja Artian dan Operasi Ladang)</i>' with Doc. No.: HRZonTimur/Staffing dated 01/08/2020 for recruitment of local workers.</p> <p>Besides, FGV Group has established Guidelines and Procedures for Responsible Recruitment of Foreign Workers dated 27/6/2019 which</p>	Complied

		available in company's website, https://www.fgyholdings.com/wp-content/uploads/2020/02/FGV-Group-Guideline-and-Procedures-For-Responsible-Recruitment-of-Foreign-Workers-Final.pdf . The procedure is to set a guideline and adopt the principles in Group Sustainability Policy including non-discrimination, respect for human rights and labour rights. The procedure has outlined the whole process starting from recruitment, hiring, employment and post-employment.	
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	<p>FGV has signed agreement with the approved agents for India and Indonesia and outlined all the terms and conditions in the agreement. In the agreement, the agents agreed not to collect any fees from workers during the recruitment process. The cost of the recruitment process was detailed out in the agreement.</p> <p>Sighted sample advertisement for field work vacancy published by Bukit Sagu 6 Estate. Seen the advertisement format and the last recruitment for local employee was Field Mandore. All the relevant recruitment records such as interview evaluation form, resume, offer letter and medical check record were kept in their personal file.</p> <p>Seen the slide presentations to present during interview and recruitment session at origin countries such as India and Indonesia. Interviewed with the foreign workers confirmed that introduction of the job offered in FGV is presented during the interview session.</p>	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	The certification unit has assessed and identified significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and determining control (HIRADC) records, as well as CHRA reports were verified during the assessment. For example, CHRA for FGVPI SB Bukit Sagu POM was last conducted on 27/07/2019 by registered assessor [#JKKP HIE 127/171/2/(8)]. Noise Risk Assessment	Non-compliance

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		<p>(Baseline) was last conducted on 25/07/2020 by a registered assessor [#HQ/18/PEB/00/00021].</p> <p>The sampled estates had assessed and identified significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and determining control (HIRADC) records, as well as CHRA reports were verified during the assessment. CHRA for the sampled estates were last conducted as follows:</p> <ul style="list-style-type: none"> - BS04 – last conducted on 19/06/2019, ref.: HQ/08/ASS/00/85-2019-0007 - BS06 – last conducted on 12/11/2018, ref.: JKKP HIE 127/171/2(8)-2017/081 - BS07 – last conducted on 09/01/2019, ref.: JKKP HIE 127/171/2(8) - BS08 – last conducted on 08/09/2017, ref.: JKKP HIE 127/171/2(8) <p>There was an accident happened on 17/08/2021 at Bukit Sagu POM’s kernel workstation (Rolek No. 5) where an employee fell from a steep staircase which has caused injury and more than 4 days LTI. Based on the accident investigation report, one of the recommended mitigation measures was to install handrail to the staircase which the mill had already done. There is also a similar staircase at Rolek No. 4, located just next to Rolek No. 5 and covered under the same safety risk evaluation (HIRADC). However, no handrail was installed to the staircase. Thus, a non-conformity report was assigned due to this lapse.</p>	
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 effectiveness of OHS plan is monitored through various platforms such internal audit, workplace inspection by safety officer and safety committee meeting. All the reports for internal audit, workplace inspection and meeting minutes were well maintained and made available for verification. The last two workplace inspections were conducted on 12/04/2021 and 05/10/2021.</p>	Complied

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		Based on the records, the mill has taken or in progress of taking action for the lapses identified by the safety officer.	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	(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 -	The mill and estates have established an annual training programme for the year 2021 that covers various aspects such as policies, best practices, OSH, environment other trainings related to third party.	Complied
3.7.2	Records of training are maintained. - Minor Compliance -	Training records for employees available and maintained at the office. Records were verified on a sampling basis that covers all aspect of training and RSPO P&C requirement. Records of training were well maintained and made available for verification.	Complied
3.7.3	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. - Minor Compliance -	Bukit Sagu POM has conducted the RSPO SCCS training on 06/09/2021. It was participated by 9 personnel from various departments such as weighbridge, process and administration. Records of attendance were available for verification.	Complied
Criterion 3.8: Supply chain requirement for mills			
3.8.1	Identity Preserved Module 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. 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	NA	Not Applicable

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	process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.		
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	Bukit Sagu POM received and processed both RSPO certified and non-certified FFB hence applied Mass Balance Module for its supply chain. Bukit Sagu 4 Estate, Bukit Sagu 6 Estate, Bukit Sagu 7 Estate and Bukit Sagu 8 Estate are currently the RSPO certified FFB suppliers of Bukit Sagu POM which consists of about 45% of its overall FFB received.	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in Table 10 of this public summary report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Bukit Sagu POM received and processed both RSPO certified and non-certified FFB hence applied Mass Balance Module for its supply chain. Bukit Sagu 4 Estate, Bukit Sagu 6 Estate, Bukit Sagu 7 Estate and Bukit Sagu 8 Estate are currently the RSPO certified FFB suppliers of Bukit Sagu POM which consists of about 45% of its overall FFB received.	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p>	<p>Bukit Sagu POM has a Standard Operating Procedures available to ensure implementation of RSPO SCCS available in the unit. Sighted the SOP for Mill RSPO SCCS; Doc Number RSPO SCCS; Issue No:3; Revision No: 05; Distribution Date: 01/09/2019. The RSPO SCCS SOP covers the implementation of all the elements of the supply chain model requirements.</p> <p>Complete and up to date records that demonstrated compliance with the supply chain requirements were available and verified. Amongst the records verified was the RSPO SCCS Internal Audit Report, Management Review</p>	Complied

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	<ul style="list-style-type: none"> 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. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>Meeting Minutes, RSPO SCCS Training Records, Mass Balance Sheets, Weighbridge Tickets of Incoming and Outgoing RSPO products.</p> <p>Bukit Sagu POM have appointed 8 personals as the committee members for RSPO SCCS in the mill to be responsible for the implementations of the SCCS requirements and compliance with all applicable requirements as sighted in the appointment letter dated 04/01/2021 undersigned by the Mill Manager. Interview with the sampled personals (Weighbridge Clerk & Auxiliary Police) indicated that they understood the SCCS procedures.</p> <p>Procedures for receiving and processing certified and non-certified FFBs including ensuring no false claim is done is mentioned in the SOP for Mill RSPO SCCS; Doc Number RSPO SCCS; Issue No:3; Revision No: 05; Distribution Date: 01/09/2019.</p>	
<p>3.8.6</p>	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. 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>FGV has developed Internal Audit Procedure (Doc. No.: ML-1A/L2-Pr11(0), Rev. 0 dated 1/6/2016) where the objective is to carry out internal audit to ensure implementation of RSPO, ISCC and MSPO. The frequency of the internal audit to be carried out is at least once a year.</p> <p>The latest internal audit was carried out on 6-9/9/2021 in Bukit Sagu POM by Sustainability Compliance & Certification Department. 1 non-conformity was raised for RSPO SCCS on Management Review. The management have stated the corrective action plan and implemented the corrective action to address the non-conformity. The non-conformity was closed as stated in the management review for SCCS dated 28/9/2021. The internal audit report and management review meeting minutes records were available for verification.</p>	<p>Complied</p>
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. 	<p>The accompanying documents of incoming FFB from own estate are estate’s weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill</p>	<p>Complied</p>

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	<ul style="list-style-type: none"> ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>issues its weighbridge ticket as confirmation of receipt. The estate's ticket number is recorded in the mill's ticket number.</p> <p>There has been no projected overproduction. Nonetheless, based on interview with the staff, the facility is aware of this requirement.</p> <p>The mechanism for handling non-conforming FFB and/or documents is addressed under "SOP for Mill RSPO SCC" [RSPO SCC, issue: 3 rev: 5, dated 1/9/2019, section "Notis Amaran/Handling Non-conformance Material & Document" which reads if the FFB supplied found to be not certified after being processed, the CPO or PK shall be downgraded to non-certified.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>Minimum information for RSPO certified products is made available in a few documents such as weighbridge ticket, gate-pass, certificate of analysis, etc.</p> <p><u>Palm Kernel</u></p> <p>Sampled Contract: RSPG5892G</p> <p>Buyer: name and address were stated in sales contract (<i>but not disclosed in this report</i>)</p> <p>Seller: Kilang Sawit Bukit Sagu</p> <p>Delivery order: L00000113</p> <p>Cargo weight: 45.73 mt</p> <p>Commodity: RSPO-certified 100%</p> <p>Certificate number: RSPO 666409</p> <p>Unique identification number – shipping instruction/confirmation (once certified)</p> <p>Shipping announcements were made by FGV marketing department located at Kuala Lumpur headquarter. The list of announcements made can be accessed in the RSPO PalmTrace.</p>	<p>Complied</p>

<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. 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. 	<p>Not applicable as no outsourcing for milling activities.</p>	<p>Not Applicable</p>
<p>3.8.10</p>	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>Not applicable as no outsourcing for milling activities.</p>	<p>Not Applicable</p>

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 as no outsourcing for milling activities.	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. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 	<p>FGVPISB Bukit Sagu Palm Oil Mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p> <p>Procedure namely Mill RSPO SCC (Mass Balance), SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 has defined at least 2 years of retention time for all records and report.</p> <p>Mass balance recording is done through utilization of "LAPORAN TAHUNAN BTS ISCC/RSPO/MSPO (Tahun)" [Annual Report of FFB ISCC/RSPO/MSPO (Year)]. It is a computerized system where certified and non-certified material and products movement is recorded. Based on verification of Mass Balance recording, it was found that the certified CPO and/or PK were always delivered from positive stock.</p>	Complied
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</p>	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Complied

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	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.		
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	NA	Not Applicable
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	Shipping announcements by the mill were represented by FGV marketing department located at Kuala Lumpur headquarters. The list of announcements made can be accessed in the RSPO PalmTrace.	Complied
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	There had been no claim made using RSPO logo & trademark by Bukit Sagu POM. Nonetheless, should there be any claim made, the facility's procedure namely SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, Issue 3, rev. 3, will be implemented to comply with this requirement.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its	Not Applicable as corporate communication is managed at FGV Holdings Berhad HQ level.	Not Applicable

	commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.		
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 as corporate communication is managed at FGV Holdings Berhad HQ level.	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 as corporate communication is managed at FGV Holdings Berhad HQ level.	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 as corporate communication is managed at FGV Holdings Berhad HQ level.	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 as corporate communication is managed at FGV Holdings Berhad HQ level.	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	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied

	organizations in the supply chain about the use of certified sustainable oil palm products.		
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.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e. product/commodity with SCC model (CPO/Palm Kernel RSPO IP) and RSPO certificate number (RSPO 666409).	Complied
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.	Bukit Sagu POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not Applicable
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with	Not Applicable as the facility does not involve with consumer end product.	Not Applicable

	the exception of RSPO Credits and of retailers in accordance with 6.8 below.		
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 as the facility does not involve with consumer end product.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Not Applicable as the facility does not involve with consumer end product.	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 as the facility does not involve with consumer end product.	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 as the facility does not involve with consumer end product.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to	Not Applicable as the facility does not involve with consumer end product.	Not Applicable

	<p>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 A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES</p>			
<p>Certified oil palm content (IP)</p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>NA</p>	<p>Not Applicable</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>NA</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 volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>NA</p>	<p>Not Applicable</p>
<p>Labelling and trademark (IP)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 	<p>NA</p>	<p>Not Applicable</p>

	4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.		
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	NA	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Oil palm claimed for MB certified contain of 100% CPO or PK MB-certified.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action	Oil palm claimed for MB certified contain of 100% CPO or PK MB-certified.	Complied

	<p>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>		
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	<p>Bukit Sagu POM does not produced bottled products and/or consumer products that requires labelling and trademark use. Thus, this requirement is not applicable.</p>	<p>Not Applicable</p>
Messaging (MB)			

	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>Bukit Sagu POM does not produce bottled products and/or consumer products that requires labelling and trademark use. Thus, this requirement is not applicable.</p>	<p>Not Applicable</p>
<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.</p> <p>- Critical (Major) compliance -</p>	<p>FGV has developed FGV Group Sustainability Policy (Policy # FGV/SED/POL/001; Rev. 4.0; Effective date: 17/11/2020) where the company recognizes its responsibility to respect and uphold international principles, standards and practices as encapsulated in the Universal Declaration of Human Rights (UDHR), United Nations Guiding Principles on Business and Human Rights (UNGPs), United Nations Sustainable Development Goals (UNSDGs) and other applicable treaties, subject to the laws and regulations of the countries and territories in which FGV Group operates. The policies have been briefed to all workers as per sample</p>	<p>Complied</p>

		sighted by Bukit Sagu POM on 1/3/2021 and on 20/4/2021 by Bukit Sagu 4 Estate.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	FGV prohibits any form of harassment in their operation as per the policy above. Consultation made with sampled stakeholders and interview conducted with sample workers confirmed that no harassment by the management.	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	FGV has established SOP for “Menangani Aduan dan Rugutan” with Doc. No.: FGV/ML-1A/L2-Pr13 dated 01/04/2019. The procedure is to provide a system for the internal and external stakeholders to lodge complaint and grievances to the management. The complaints will be solved in 14 days (first stage), 14 days (second stage). The complaint has to be resolved within 2 months from the date of discussion in third stage. Besides, whistleblowing e-form was available in https://www.fgvholdings.com/whistleblowing/ for the stakeholders to report a grievance.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Procedures in place established as SOP for “Menangani Aduan dan Rugutan” with Doc. No.: FGV/ML-1A/L2-Pr13 dated 01/04/2019. The procedure is to provide a system for the internal and external stakeholders to lodge complaint and grievances to the management. The SOP have been briefed to all workers as per sample sighted by Bukit Sagu POM on 1/3/2021 and on 20/4/2021 by Bukit Sagu 4 Estate.	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	No grievance received by all operating units within Bukit Sagu POM certification unit since last audit except for workers housing repair complain/request and external stakeholders requests as per sample as following:	Complied

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		<ul style="list-style-type: none"> - Bukit Sagu 4 Estate: Proposal to upgrade road access by Tinjau Makmur Sdn. Bhd. Quarry Premise; Letter date: 30/9/2021; Response letter by Bukit Sagu 4 Estate Ref. # (02)330/Kuari; Date: 6/10/2021 - Bukit Sagu 8 Estate: Request to borrow grass cutting machine by Persatuan Belia (MBFM) Felda Bukit Sagu 2; Letter Ref. # MBFM/SAGU2/002/s.k(84); Date: 18/3/2021; Response by Bukit Sagu 8 Estate date: 18/3/2021 	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>As per SOP for Complaint & Grievance (Doc no: FGV/ML-1A/L2-Pr13 issue 01, revision 02 dated 01.04.2019, under clause 7.1.4 (4th stages) 7.1.4.1 if there is no agreement after complaint lodges to the headquarters, the complaint can be escalated to Jabatan Perhubungan Perusahaan, Kementerian Sumber Manusia or Panel Aduan Persijilan Kelestarian (RSPO or MSPO) as a solution.</p>	Complied
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>FGV Holdings Berhad has instructed the contribution of fruit basket to quarantine workers due to COVID-19 as per letter of "<i>Kelulusan Sumbangan Bakul Makanan Berupa Barangan Keperluan Asas Atau Bantuan Makan Bagi Petugas/Pekerja Divisyen Huluan Yang Dikuarantin Pusat Kuarantin (Quarantine Center), Kediaman Masing-Masing (Home Quarantine), Atau Di Pusat Pengasingan (Isolation Center)</i>"; Letter # (112) Korporat/Surat Am/COVID-19/2021; Date: 9/8/2021.</p> <p>Based on the instructions, sighted sample records of contributions as following:</p> <ul style="list-style-type: none"> - Micro Sourcing Application Form; Appendix 7 for the purchase of fruit basket supplies sample for Bukit Sagu 4 Estate; Application # 35/91; Date: 15/9/2021. 	Complied

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		<ul style="list-style-type: none"> - Bukit Sagu 6 Estate Contribution of <i>Skim Bantuan Perumahan Pekerja Tempatan (SBPPT) 2019</i>; for long service worker as per letter ref. # (26) 09/02-01/-SBPPT; Date: 29/1/2021 - Bukit Sagu 6 Estate contribution of blanket to foreign workers; date: 19/4/2021 - Bukit Sagu 6 Estate contribution of food basket 2021; Date: 14/6/2021 - Bukit Sagu 8 Estate contribution of grass-cutting service to Persatuan Belia (MBFM) Felda Bukit Sagu 2; Date: 18/3/2021 - Bukit Sagu 8 contribution of lorry transport to Sekolah Menengah Kebangsaan Bukit Sagu; Date: 30/12/2020 	
<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>			
<p>4.4.1</p>	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence of legal ownership of the land including the history of land tenure was verified during the audit.</p> <p>Bukit Sagu POM located within FGVPISB own land as per sighted Bukit Sagu POM land title # 17995; Lot # PT 1129; Area: 781.40 m3; District: Kuantan; Sub-district: Mukim Ulu Kuantan.</p> <p>All FGVPMSB estates have Tenancy Agreement dated 06/01/2012 which commenced on 01/01/2012 between FELDA and FGV and the agreement will further renew every 3 years up to total 99 years was sighted for Bukit Sagu Complex as per leasing agreement as following:</p> <ul style="list-style-type: none"> - Bukit Sagu Estate 07: Total 2,211.88 ha of land in Bukit Sagu Estate 07 was leased from FELDA to manage. - Bukit Sagu Estate 08: Total 2,233.10 ha of land in Bukit Sagu Estate 08 was leased from FELDA to manage. - Bukit Sagu Estate 04: Total 3,340.29 ha of land in Bukit Sagu Estate 04 was leased from FELDA to manage. 	<p>Complied</p>

		Bukit Sagu Estate 06: Total 1,766.44 ha of land in Bukit Sagu Estate 06 was leased from FELDA to manage.	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no land dispute in the Bukit Sagu Certification Unit at the time of audit. FGV Holding Berhad was leased the land from FELDA with tenancy agreement was made and it was confidential. The surrounding is owned by FELDA and the settlers. Interviewed with the stakeholders confirmed that no encroachment of land by the company.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	There is no land dispute in the Bukit Sagu Certification Unit at the time of audit. FGV Holding Berhad was leased the land from FELDA with tenancy agreement was made and it was confidential. The surrounding is owned by FELDA and the settlers. Interviewed with the stakeholders confirmed that no encroachment of land by the company.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	There is no land dispute in the Bukit Sagu Certification Unit at the time of audit. FGV Holding Berhad was leased the land from FELDA with tenancy agreement was made and it was confidential. The surrounding is owned by FELDA and the settlers. Interviewed with the stakeholders confirmed that no encroachment of land by the company.	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 Bukit Sagu Certification Unit at the time of audit. FGV Holding Berhad was leased the land from FELDA with tenancy agreement was made and it was confidential. The surrounding is owned by FELDA and the settlers. Interviewed with the stakeholders confirmed that no encroachment of land by the company.	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	Estate field maps available indicating boundary of each estates within Bukit Sagu complex. There is no land dispute in the Bukit Sagu Certification Unit at the time of audit. FGV Holding Berhad was leased the land from FELDA with tenancy agreement was made and it was confidential. The surrounding	Complied

	neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	is owned by FELDA and the settlers. Interviewed with the stakeholders confirmed that no encroachment of land by the company.	
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 Bukit Sagu Certification Unit at the time of audit. FGV Holding Berhad was leased the land from FELDA with tenancy agreement was made and it was confidential. The surrounding is owned by FELDA and the settlers. Interviewed with the stakeholders confirmed that no encroachment of land by the company.	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 Bukit Sagu Certification Unit at the time of audit. FGV Holding Berhad was leased the land from FELDA with tenancy agreement was made and it was confidential. The surrounding is owned by FELDA and the settlers. Interviewed with the stakeholders confirmed that no encroachment of land by the company.	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 Bukit Sagu Certification Unit at the time of audit. FGV Holding Berhad was leased the land from FELDA with tenancy agreement was made and it was confidential. The surrounding is owned by FELDA and the settlers. Interviewed with the stakeholders confirmed that no encroachment of land by the company.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	There was a new planting on 2019 in Bukit Sagu Estate 08 for total 61.54 ha which is under the leased land from FELDA and it is RSPO certified area as reported. There was no acquisition of new land for new planting for Bukit Sagu Estate 08.	Complied
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions,	There was a new planting on 2019 in Bukit Sagu Estate 08 for total 61.54 ha which is under the leased land from FELDA and it is RSPO certified area as reported. There was no acquisition of new land for new planting for Bukit Sagu Estate 08.	Complied

	with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -		
4.5.3	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. - Minor compliance -	There was a new planting on 2019 in Bukit Sagu Estate 08 for total 61.54 ha which is under the leased land from FELDA and it is RSPO certified area as reported. There was no acquisition of new land for new planting for Bukit Sagu Estate 08.	Complied
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	There was a new planting on 2019 in Bukit Sagu Estate 08 for total 61.54 ha which is under the leased land from FELDA and it is RSPO certified area as reported. There was no acquisition of new land for new planting for Bukit Sagu Estate 08.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	There was a new planting on 2019 in Bukit Sagu Estate 08 for total 61.54 ha which is under the leased land from FELDA and it is RSPO certified area as reported. There was no acquisition of new land for new planting for Bukit Sagu Estate 08.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the	There was a new planting on 2019 in Bukit Sagu Estate 08 for total 61.54 ha which is under the leased land from FELDA and it is RSPO certified area	Complied

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	operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	as reported. There was no acquisition of new land for new planting for Bukit Sagu Estate 08.	
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	There was a new planting on 2019 in Bukit Sagu Estate 08 for total 61.54 ha which is under the leased land from FELDA and it is RSPO certified area as reported. There was no acquisition of new land for new planting for Bukit Sagu Estate 08.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There was a new planting on 2019 in Bukit Sagu Estate 08 for total 61.54 ha which is under the leased land from FELDA and it is RSPO certified area as reported. There was no acquisition of new land for new planting for Bukit Sagu Estate 08.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	FGV developed a procedure on " <i>Pengenalpastian dan penyelesaian pertikaian tanah</i> " with Doc. # ML-1A/L1-Pr10(0) dated 01/06/2016. The objective of the procedure is to handle and monitor issue raised from local communities on customary or user rights. Procedure on the compensation to the people entitled and monitoring of boundary stone was detailing in the procedure. Compensation will be paid according to basic cost/ acre and market land price.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	The same procedure on " <i>Pengenalpastian dan penyelesaian pertikaian tanah</i> " with Doc. # ML-1A/L1-Pr10(0) dated 01/06/2016 has included with method for calculating and distributing fair compensation (monetary or otherwise) participatorily. No issues related to loss of legal customary rights with indigenous peoples, local communities, settlers and other stakeholders reported during the time of audit through interviewed with the settlers. Boundary stone and trenches	Complied

		were available to demarcate the boundary of land between the neighboring stakeholders.	
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities, settlers and other stakeholders reported during the time of audit through interviewed with the settlers. Boundary stone and trenches were available to demarcate the boundary of land between the neighbouring stakeholders.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities, settlers and other stakeholders reported during the time of audit through interviewed with the settlers. Boundary stone and trenches were available to demarcate the boundary of land between the neighbouring stakeholders.	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 -	FGV developed a procedure on " <i>Pengenalpastian dan penyelesaian pertikaian tanah</i> " with Doc. # ML-1A/L1-Pr10(0) dated 01/06/2016. The objective of the procedure is to handle and monitor issue raised from local communities on customary or user rights. Procedure on the compensation to the people entitled and monitoring of boundary stone was detailing in the procedure. Compensation will be paid according to basic cost/ acre and market land price.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	The same procedure on " <i>Pengenalpastian dan penyelesaian pertikaian tanah</i> " with Doc. # ML-1A/L1-Pr10(0) dated 01/06/2016 has included with method for calculating and distributing fair compensation (monetary or otherwise) participatorily. No issues related to loss of legal customary rights with indigenous peoples, local communities, settlers and other stakeholders reported during the time of audit through interviewed with the settlers. Boundary stone and trenches	Complied

		were available to demarcate the boundary of land between the neighboring stakeholders.	
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	There is no customary right land in Bukit Sagu Certification Unit.	Not Applicable
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	There is no customary right land in Bukit Sagu Certification Unit.	Not Applicable
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	There is no customary right land in Bukit Sagu Certification Unit.	Not Applicable
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable	There is no customary right land in Bukit Sagu Certification Unit.	Not Applicable

	customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -		
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 -	There is no customary right land in Bukit Sagu Certification Unit.	Not Applicable
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and past prices paid for Fresh Fruit Bunches (FFB) has been displayed at the mill weighbridge counter. Pricing was according to the MPOB pricing.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Evidence available that the mill explains the FFB pricing to smallholders during the JPPK meetings held as per sample sighted as following: <ul style="list-style-type: none"> o Minit Mesyuarat Jawatankuasa Perundingan, Permuafakatan dan Kualiti (JPPK) Bukit Sagu between Mill Manager, Felda Manager, FTP Manager, Head of Settlers & Area Quality Supervisor; Ref. # 04/2021; Date: 09/09/2021 o Minit Mesyuarat Jawatankuasa Perundingan, Permuafakatan dan Kualiti (JPPK) Bukit Sagu between Mill Manager, Felda Manager, FTP Manager, Head of Settlers & Area Quality Supervisor; Ref. # 02/2021; Date: 23/04/2021 	Complied

5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>Fair pricing, calculated based on MPOB prices documented as per sample sighted for external supplier as following:</p> <ul style="list-style-type: none"> - Makluman Tawaran Harga Belian BTS FGV Trading Sdn. Bhd.; Bil (44)FGVTSB/FFBPD/HQ/01; Date: 11/3/2020 as following: <ul style="list-style-type: none"> • Harga A: For Felda Settlers only based on Daily FFB price per 1% • Harga B • Harga C 	Complied
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts through sessions of meeting as per sample sighted as following:</p> <ul style="list-style-type: none"> ○ Minit Mesyuarat Jawatankuasa Perundingan, Permuafakatan dan Kualiti (JPPK) Bukit Sagu between Mill Manager, Felda Manager, FTP Manager, Head of Settlers & Area Quality Supervisor; Ref. # 04/2021; Date: 09/09/2021 ○ Minit Mesyuarat Jawatankuasa Perundingan, Permuafakatan dan Kualiti (JPPK) Bukit Sagu between Mill Manager, Felda Manager, FTP Manager, Head of Settlers & Area Quality Supervisor; Ref. # 02/2021; Date: 23/04/2021 	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Contracts are fair, legal and transparent and have agreed timeframe based on the letter of Notification of FFB Purchase Price Offer by FGV Trading (FGVT) Sdn. Bhd.; Notification # (44) FGVTSB/ FFBPD/ HQ/01; Date: 11/3/2020.</p> <p>Notification specified 3 FFB pricing categories as following:</p> <ul style="list-style-type: none"> - A: FFB price for supplier with contract between FELDA & FGVT - B: FFB price for external/retail supplier without FGVT contract 	Complied

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		<ul style="list-style-type: none"> - C: FFB price for supplier with contract between FGVPM/FAS/ External FFB & FGVT. - All pricing categories calculation are based on regional MPOB daily FFB price, FFB grading & OER %. 	
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>	<p>Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given within 15 days as per sample sighted as following:</p> <ul style="list-style-type: none"> - Supplier: Sebertak AutoTrading; Invoice date: 22/6/2021; Payment posting date: 30/6/2021 - Supplier: Arah Bermaju Enterprise; Invoice date: 3/9/2021; Payment posting date: 31/9/2021 	Complied
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>	<p>Weighbridge calibration was conducted by De Metrology Sdn. Bhd. as per records of Form D (Weighing & Measuring); Weighing & Measuring Calibration Acknowledgement; Weighing & Measuring Act 1972; Weighing & Measuring Regulations 1981 as following:</p> <ul style="list-style-type: none"> - Serial # C044409186 DE2 019504; Safety sticker # DE18 001817; Model: Mettler Toledo 60,000 kg IND 780; Date: 15/6/2021 - Serial # B812577828 DE2 019504; Safety sticker # DE18 001773; Model: Mettler Toledo 80,000 kg IND 780; Date: 7/4/2021 	Complied
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>	<p>Bukit Sagu POM certification units indirectly supports the smallholders among Felda Settlers who are managed by dedicated Felda Scheme Smallholders Manager, together with its Settlers Farm Operational Manager Felda Technoplant. FFB suppliers other than the Felda Settlers are free to choose whether to sell their crop or not to Bukit Sagu POM.</p>	Complied

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>	<p>The same grievance mechanism as described in Criteria 4.2 is used. As of the audit date, there were 3 grievance reports received from smallholders which were addressed satisfactorily.</p>	Complied
<p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
5.2.1	<p>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.</p> <p>- Minor compliance -</p>	<p>Consultation mainly involved Felda Settlers through periodical sessions of meeting as per sample sighted as following:</p> <ul style="list-style-type: none"> ○ Minit Mesyuarat Jawatankuasa Perundingan, Permuafakatan dan Kualiti (JPPK) Bukit Sagu between Mill Manager, Felda Manager, FTP Manager, Head of Settlers & Area Quality Supervisor; Ref. # 04/2021; Date: 09/09/2021 ○ Minit Mesyuarat Jawatankuasa Perundingan, Permuafakatan dan Kualiti (JPPK) Bukit Sagu between Mill Manager, Felda Manager, FTP Manager, Head of Settlers & Area Quality Supervisor; Ref. # 02/2021; Date: 23/04/2021 <p>All issues related to FFB delivered to the mill as well as their needs for support to improve their livelihoods and their interest in RSPO certification were discussed in the meeting.</p>	Complied
5.2.2	<p>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).</p> <p>- Minor compliance -</p>	<p>Bukit Sagu POM certification units indirectly supports the smallholders among Felda Settlers, who are managed by dedicated Felda Scheme Smallholders Manager together with its settlers Farm Operational Manager Felda Technoplant.</p> <p>Furthermore, there were records available related to support program by BS07 Estate as per sample sighted as following:</p> <ul style="list-style-type: none"> ▪ Support to SM Pelangi Sdn. Bhd. (small smallholder company) to provide access through BS07 field ▪ Support to provide water to SM Pelangi Sdn. Bhd. 	Complied

5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Bukit Sagu POM certification units indirectly supports the smallholders among Felda Settlers who are managed by dedicated Felda scheme smallholders manager together with its settlers farm operational manager Felda Technoplant. Nonetheless, current FFB legality control established as per indicator 2.3.1 above.	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Bukit Sagu POM certification units indirectly supports the smallholders among Felda Settlers who are managed by dedicated Felda scheme smallholders manager together with its settlers farm operational manager Felda Technoplant. Nonetheless, current best practices implementation promoted through policies and procedures available publicly in operating unit's office area.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Bukit Sagu POM certification units indirectly supports the smallholders among Felda Settlers who are managed by dedicated Felda scheme smallholder's manager together with its settlers farm operational manager Felda Technoplant.	Complied
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	FGV has developed FGV Group Sustainability Policy (Policy # FGV/SED/POL/001; Rev. 4.0; Effective date: 17/11/2020) where all employees and workers shall receive equal treatment based on their relevant merits and competency regardless of gender, race, nationality, religion, age, physical condition, and marital status, reproductive rights of women, union membership/affiliation / employment status, or political affiliation.	Complied
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.	Consultation made with sampled stakeholders and interview conducted with sample workers comprises of different gender and nationalities confirmed that no discrimination has occurred in the plantations. The management treated all equally such as provided free accommodation and medical to all	Complied

	- Critical (Major) compliance -	the workers, no charging of recruitment fees for the foreign workers and offered job based on capability.	
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	The recruitment of foreign workers is through JTK Department in HQ based on the regulation requirements. For local workers, they will display job vacancy advertisement in the estates or Wilayah office. Medical test will be required for all the workers prior to start work. All the recruitment is done based on skills, capabilities, qualities and medical fitness.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	The recruitment records of the medical check-up reviewed found that pregnancy testing is not a criterion for pre-employment. Interviewed with the female workers confirmed that pregnancy testing is not a pre-requisite to join the company.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	Gender committee in place established as <i>Kelab Keluarga Dayabudi</i> (KKD) to raise awareness, identify and address of concern, as well opportunities and improvements for woman. Sighted sample latest minutes of meeting for gender committee activities conducted by Bukit Sagu 8 Estate on 17/3/2021. No issue related to sexual harassment and violence reported. Rights of the female workers and reproductive rights were explained during the meeting. During the meeting, the Chairman has informed the committee that they had discussed with the management to allow the new mother to have break time for breastfeeding. Interviewed with the Chairman of Gender Committee confirmed that there is no new mother for the past 2 years.	Complied
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Review of sample payslips for January 2021, May 2021 and August 2021 in Bukit Sagu POM and all estates' workers consists of male and female workers found that their salary is the same for the same job scope. They were paid according to the Minimum Wage Order 2021 without any discrimination.	Complied

Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Employment based on collective agreements as following:</p> <ul style="list-style-type: none"> - Estate employee work agreement terms & conditions based on the Collective Agreement; COG # 023/2020; Registered on 22/1/2020 between FGV Plantations (Malaysia) Sdn. Bhd. with Kesatuan Pekerja-Pekerja FGV Plantatations (Malaysia) Sdn. Bhd. Semenanjung; Period: 1/1/2019 to 31/12/2021. - Collective Agreement; COG # 025/2020; Registered on 22/1/2020 between FGV Plantations (Malaysia) Sdn. Bhd. with Kesatuan Pekerja-Pekerja FGV Plantatations (Malaysia) Sdn. Bhd. Semenanjung; Period: 1/1/2019 to 31/12/2021. <p>All the workers have signed on the employment contract or offer letter (local worker) prior to work. The contract available in local Bahasa Malaysia and English languages as well as workers' national language including Indonesian and Bangladeshi. All terms and conditions were clearly outlined in the contract and briefed to all the workers before they signed the contract during induction training. Sampled of the contracts sighted in indicator 6.2.2 below.</p>	Complied
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>Bukit Sagu POM samples as per following:</p> <ul style="list-style-type: none"> - Employee # 20026; M; Crane Driver - Employee # 30152; F; GW - Operation - Employee # 30373; M; GW - Operation - Employee # 30428; F; GW - Operation - Employee # 30511; M; GW - Operation - Employee # 30548; F; GW - Operation <p>Bukit Sagu 4 Estate samples as per following:</p>	Complied

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		<ul style="list-style-type: none"> - Employee # FW03301172; M; Harvester - Employee # FW03301399; M; GW - Operation - Employee # FW03301395; M; Harvester - Employee # FW03301374; M; Loader - Employee # FW03301147; M; GW - Operation - Employee # FW03301362; M; Quality Inspector <p>Bukit Sagu 6 Estate samples as per following:</p> <ul style="list-style-type: none"> - Employee # LW03680090; M; GW - Admin - Employee # FW03680962; M; GW - Operation - Employee # FW03680996; M; Harvester - Employee # LW03680048; F; GW - Operation - Employee # FW03680945; M; Harvester - Employee # LW03680100; F; GW - Admin <p>Bukit Sagu 7 Estate samples as per following:</p> <ul style="list-style-type: none"> - Employee # LW04750002; M; Tractor Driver - Employee # LW04750045; M; Mandore - Harvesting - Employee # LW04750063; F; GW - Admin - Employee # LW04750065; F; GW - Admin - Employee # LW04750013; M; Mandore - GW - Employee # LW04750051; M; Lorry Driver <p>Bukit Sagu 8 Estate samples as per following:</p> <ul style="list-style-type: none"> - Employee # FW06290198; M; Harvester - Employee # FW06290966; M; GW - Operation - Employee # LW06290028; M; Mandore - Harvesting - Employee # LW06290073; F; GW - Admin - Employee # FW06290430; M; Collector – Loose Fruit 	
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		- Employee # FW06290961; M; Harvester	
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>Review of sample payslips for January 2021, May 2021 and August 2021 in Bukit Sagu POM and all estates confirmed that the workers were paid according to the Employment Act 1955 and Minimum Wage Order 2021. Deduction of wages was made as per sample permit from Labour Department as following:</p> <ul style="list-style-type: none"> - Bukit Sagu POM: JTK Salary deduction permit; Serial no. PP 3/34/1385; Date: 28/1/2009 - Bukit Sagu 7 Estate: JTK authorization letter ref. # (22) dlm BHG .PU/9/129 Jld 23 dated 26/4/2016 for workers' salary deduction of electricity, water and medical 	Complied
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Adequate housing and facilities sufficiently provided by the company with upkeep of facilities were evidence as per sample Bukit Sagu POM latest housing inspection date: 31/10/2021 by Mr. Zoofrazer, General Clerk and approved by Mr. Ramdan Hashim, Executive Assistant. Previous inspection was on 16/10/2021 & 2/10/2021. Sample Bukit Sagu 7 Estate housing inspection latest dated 11/3/2021 as per records of Pemeriksaan Kawasan Perumahan Dan Asrama FGV Bukit Sagu 07 Tahun 2021.</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>Foods are accessible through sundry shops at the vicinity of the operating units within Felde Bukit Sagu settlers village as well as nearby town of Kuantan. Most of the sundry shops are operated by the settlers (Felde) through its Village Committee (JKKR) and there's also FGV parent company's (Felde) own supermarket i.e. Felde D'Mart which sell sundries at reasonable prices.</p>	Complied

<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with</i></p>	<p>FGV Bukit Sagu POM and all estates established the prevailing wage calculation to include all the in-kind benefits provided to the workers as per records of Decent Living Wages Plan Bukit Sagu Complex; Prepared by: Sustainability Compliance & Certification Department (SCCD); Date: 16/1/2020. The plan based on Kadar Upah Kerja (KUK) that has been reviewed and approved by Jabatan Tenaga Kerja SJTKSM. Analysis result shown the total value of prevailing wage as following:</p> <ul style="list-style-type: none"> - Local worker: RM 2,280.30 - Foreign worker: RM 1,951.85 	<p>Complied</p>
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	<p><i>the RSPO Guidance for Implementing a Decent Living Wage</i> (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).</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 • 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>All the core operational works are performed by permanent and full-time employees in Bukit Sagu POM and all estates. No contract worker was employed. Contractor's workers were engaged as lorry driver to transport the FFB to mill.</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>FGV has developed FGV Group Sustainability Policy (Policy # FGV/SED/POL/001; Rev. 4.0; Effective date: 17/11/2020) where FGV commits to respect employees' and workers' right to freedom of movement, fair working hours, freedom of association and right to decent living condition.</p> <p>Socialization of Group Sustainability Policy to stakeholders made during online/emailed consultation. Individual site briefing done from time to time</p>	Complied

		during daily muster rollcall for workers as per sample sighted for Bukit Sagu POM on 1/3/2021 and on 20/4/2021 by Bukit Sagu 4 Estate.	
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request. - Minor compliance -	Workers Union was established at sub-company level for both mill and estate with latest meeting records sighted available as following: - Mill Workers Union: <i>Kesatuan Pekerja-Pekerja FGV Plantations Industries Sdn. Bhd. Cawangan Bukit Sagu; Mesyuarat Ahli Jawatankuasa Bagi Sessi Keempat 2019 - 2022</i> ; Date: 25/6/2021; Bil. # (04)KPPFPISB/BS/19-22. - Estate Workers Union: <i>Kesatuan Pekerja-Pekerja FGV Plantations (Malaysia) Sdn. Bhd.; Minit Mesyuarat Jawatankuasa Kerja Bil.: 76</i> ; Date: 13/2/2020.	Complied
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	The workers have the right to join or form trade unions of their own choosing without prior authorization and to bargain collectively. Interviewed with the workers confirmed that the election of the representatives was elected freely by the workers without any interference of management.	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	FGV has developed FGV Group Sustainability Policy (Policy # FGV/SED/POL/001; Rev. 4.0; Effective date: 17/11/2020) where the company commits to eliminate any form of child labour and this has stated in the Supplier Code of Conduct which signed by every suppliers and contractors that engaged by the company.	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.	As per the Group Sustainability Policy, the minimum age for employment of workers is above 18 years old. For recruitment of foreign workers, the main criteria must be within 18 – 45 years old. Before interview for local worker, they are required to submit copy of certificate of education and identification card for age verification. Reviewed the master list of employees found that no child labour was employed.	Complied

	- Critical (Major) compliance -		
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Employee Master Listing and through interviewed with the stakeholders.	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 -	The management of Bukit Sagu POM and all estates has communicated the Group Sustainability Policy and Supplier Code of Conduct (SCOC) to the third party, FFB suppliers and local communities during stakeholder meetings and before providing services to the company. Contractor's pledge as per sighted agreements for following samples: - Sri Cakra Enterprise - Nalar Gemilang Enterprise - Sebertak Auto Trading - Gerimis Indah Enterprise - Greenverse Sdn. Bhd.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	FGV has developed FGV Group Sustainability Policy (Policy # FGV/SED/POL/001; Rev. 4.0; Effective date: 17/11/2020) which includes the commitment against sexual and all other forms of harassment as well as violence in the workplace. Communication made from time to time to all employees through general assembly or meeting such as in latest sample <i>Kelab Keluarga Dayabudi</i> (Gender Committee) meeting for gender committee activities conducted by Bukit Sagu 8 Estate on 17/3/2021.	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	FGV has developed FGV Group Sustainability Policy (Policy # FGV/SED/POL/001; Rev. 4.0; Effective date: 17/11/2020) which includes the commitment to protect the reproductive rights of all, especially women in the workplace. Communication made from time to time to all employees through general assembly or meeting such as in latest sample <i>Kelab Keluarga Dayabudi</i> (Gender Committee) meeting for gender committee activities conducted by Bukit Sagu 8 Estate on 17/3/2021.	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>New mothers assessment conducted by individual operating units within Bukit Sagu complex through New Mothers' Assessment Form as per sample conducted by Bukit Sagu 4 Estate Dated 17/7/2021.</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>As per SOP for Complaint & Grievance (Doc no: FGV/ML-1A/L2-Pr13 issue 01, revision 02 dated 01.04.2019, under clause 7.1.4 (4th stages) 7.1.4.1 if there is no agreement after complaint lodges to the headquarters, the complaint can be escalated to Jabatan Perhubungan Perusahaan, Kementerian Sumber Manusia or Panel Aduan Persijilan Kelestarian (RSPO or MSPO) as a solution.</p> <p>Communication made from time to time to all employees through general assembly or meeting such as in latest sample <i>Kelab Keluarga Dayabudi</i> (Gender Committee) meeting for gender committee activities conducted by Bukit Sagu 8 Estate on 17/3/2021.</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>FGV has signed agreement with the approved agents for India and Indonesia and outlined all the terms and conditions in the agreement. In the agreement, the agents agreed not to collect any fees from workers during the recruitment process. The cost of the recruitment process was detailed out in the agreement.</p> <p>Sighted sample advertisement for field work vacancy published by Bukit Sagu 6 Estate. Seen the advertisement format and the last recruitment for local employee was Field Mandore. All the relevant recruitment records such as interview evaluation form, resume, offer letter and medical check record were kept in their personal file.</p> <p>Seen the slide presentations to present during interview and recruitment session at origin countries such as India and Indonesia. Interviewed with the foreign workers confirmed that introduction of the job offered in FGV is presented during the interview session.</p>	Complied

	- Critical (Major) compliance -		
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>FGV Group has established Guidelines and Procedures for Responsible Recruitment of Foreign Workers dated 27/6/2019 which available in company's website, https://www.fgyholdings.com/wp-content/uploads/2020/02/FGV-Group-Guideline-and-Procedures-For-Responsible-Recruitment-of-Foreign-Workers-Final.pdf. The procedure is to set a guideline and adopt the principles in Group Sustainability Policy including non-discrimination, respect for human rights and labour rights. The procedure has outlined the whole process starting from recruitment, hiring, employment and post-employment.</p> <p>Specific for FGV Mills, a Guidelines for Recruitment & Appointment of General Workers G7; Ref. # 2020/1; Rev. # 3; Effective date: 1/5/2020 was established and implemented by Bukit Sagu POM.</p>	Complied
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
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 mill and estates have their own safety committee. Meetings were held on quarterly basis as per regulation. Nonetheless, since the MCO was in place, occasionally some of the meetings were delayed. Among the agenda discussed were:</p> <ul style="list-style-type: none"> i) <i>Perkara berbangkit dari mesyuarat lepas</i> (Outstanding issues from previous meeting) ii) <i>Laporan prestasi keselamatan dan kesihatan pekerjaan</i> (Occupational safety & Health performance report) iii) <i>Laporan audit QOSHE</i> (QOSHE audit report) iv) <i>Laporan pemantauan alam sekitar</i> (Environmental monitoring report) v) <i>Laporan program keselamatan dan kesihatan pekerjaan</i> (Occupational safety & health programme report) vi) <i>Laporan keselamatan/kejadian merbahaya</i> (Dangerous incident report) 	Complied

		<p>vii) <i>Rungutan dari pihak yang berkepentingan</i> (stakeholders' complaint)</p> <p>viii) <i>Hal-hal berkaitan</i> (AOB)</p> <p>ix) <i>Pemeriksaan stesen</i> (workplace inspection)</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p><u>FGVPISB Bukit Sagu POM</u></p> <p>Procedure for Emergency Response Plan (ERP) was established and defined in procedure <i>Prosedur Kerja Selamat – Pertolongan Cemas</i> (Doc. No. – FPI-PK-035).</p> <p>The following emergency response plans were available addressing the following incidents:</p> <ul style="list-style-type: none"> • CPO leakage/spillage • Diesel leakage/spillage • Fire breakout at the mill • Collapse of building/roofing • Industrial accident <p>Firefighting system inspection carried on quarterly basis. The inspection includes fire extinguisher inspection, fire hydrant and hose reel. Accident and emergency procedures have been communicated to employees. Workers trained in First Aid were present in the mill operation.</p> <p><u>Estates</u></p> <p>The Emergency Response Plan for Minor Accidents, Fire, Spillage and Poisoning was established in the FGV Emergency Response Procedure (<i>Menghadapi Kecemasan</i>) – FGV/ML-1A/L2-Pr15. The estates also have a list of personals to contact in case of any emergency.</p>	Complied
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as</p>	<p>The mill employees have been provided with PPE appropriate to their work hazards. It was observed during site visit, the PPE provided to the operators such as safety boots, safety helmets, ear plugs, face shield, leather gloves</p>	Complied

	<p>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>and straw hats. In addition, the operators have also been given training by the management regarding the usage of PPE, safety and health awareness with reference to Safe Operating Procedure. Sanitation facilities are available for those handling chemicals in the form of a shower room. Records of PPE issuance were well maintained in a file which has the information about names & signatures of recipients, types of job, dates of issuance and types of PPE issued.</p> <p>Employees of the estates have been provided with proper Personal Protective Equipment. Observed during site visit, the PPE provided to the operators such as safety boots, safety helmets, gloves, aprons, respiratory masks, etc. The operators have also been trained on the PPE usage, safety and health issues by the management. Sanitation facilities were also available on-site for operators handling chemicals in terms of shower room and PPE store.</p>	
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Both local and foreign workers are covered with SOCSO. This is verifiable through pay slips and premium payment voucher to the authority. Should there be any medical treatment needed, in-house clinics are available attended by hospital/medical assistants.</p>	Complied
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records on Lost Time Accident (LTA) metrics displayed at the operating units through Safety Statistic Billboard. The display has the information about number of days without incident, incident category, number of incidents, and date of updating.</p>	Complied
Principle 7: Protect, conserve and enhance ecosystems and the environment			
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p>	<p>An IPM plan is implemented and available in the "<i>Pelan Pengurusan Kawalan Serangan Makhluk Perosak Tanaman Bersepadu (IPM)</i>" for the year 2021.</p>	Complied

	- Critical (Major) compliance -	Among the IPM observed during the site visits at the estates were planting of beneficial plants (e.g. Tunera sp., Cassia cobanensis and Antigonan leptopus) and using of barn owls (Tyto alba) as predators to rats.	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	No evidence of species referenced in the Global Invasive Species Database and CABI.org were used to manage the areas in Bukit Sagu complex.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	The Group Sustainability Policy (FGV/SED/POL/001) dated 29/5/2019 states No Open burning policy in all its premise. Interview with the estate management and workers indicated that there was no use of fire as pest control in the estates. Visit around the estate also indicated that there was no evidence of fire being used as the methods of pest control is mainly via pesticide applications and biological controls (IPM).	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(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. - Critical (Major) compliance -	The justification of chemical was available under document in the company's agriculture manual (#MLSL(Ed.3)-Sec 4(2.0) dated 1 Sept 2017). The chemicals are categorized into 3 types i.e. herbicide, insecticide, and fungicide. The application methods that are specific to the target pest, weed or disease are described in the manual.	Complied
7.2.2	(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. - Critical (Major) compliance -	Records of pesticides use were documented in " <i>Rekod Racun 5 tahun & Pengiraan a.i/hektar & a.i/tan BTS</i> ". Among the information available in the records was active ingredients (a.i.), LD50, treated area size, number of applications, a.i./Ha, and a.i./mt FFB.	Complied
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -	There is no Class I and/or II pesticides used. Paraquat has been totally replaced with glyphosate and other Class III or IV herbicides.	Complied

7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There was no evidence that prophylactic pesticide has been used by the sampled estates.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>Paraquat was eliminated [memo from FGV Executive Director ref.: (27)010810/HQ/JAB.OP.17/ Plantations/AM dated 08/05/2017, Prohibition on Using Paraquat Dichloride]. Alternatives such as Glyphosate and glufosinate ammonium were used with the elimination of Paraquat. Based on the latest chemical register only class III & IV chemical used at the sampled estates.</p>	Complied
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were handled, used or applied by trained workers applied in accordance to the product label. Appropriate safety and application equipment were provided and used. Samples of chemical safety data sheet (SDS) were checked during site visit. All precautions attached to the products (SDS, notice board etc) were properly observed, applied, and understood by workers based on the interview.</p>	Complied

7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices. - Critical (Major) compliance -</p>	<p>The pesticides were kept in the designated stores at all the sampled estates in accordance to the regulations. The stores were equipped with locks, ventilation and accessibility was limited to authorized personnel only. Appropriate hazard signage was also put up to create awareness.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -</p>	<p>All pesticide containers are triple rinsed and punctured before being disposed to the authorised collector. Receipts of disposal were made available for verification.</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -</p>	<p>Aerial spraying of pesticides is not practiced by the estates.</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -</p>	<p>Medical surveillances were conducted in timely manner by the estates as per CHRA recommendation for employees involved in pesticides handling such as spraying operators and store clerks by DOSH registered OH doctors. Based on the medical surveillance latest reports, all the employees had passed the tests and declared fit to work.</p>	Complied
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance -</p>	<p>There was no evidence that persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions were undertaking work with pesticides.</p>	Complied
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			

<p>7.3.1</p>	<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>Wastes management plan is developed based on the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. The Waste Management Plans 2021 were established to mitigate and control the identified wastes and source of pollution. Generally, the scheduled wastes were disposed through licensed vendors, organic wastes were disposed through landfill and recyclable wastes were sent to recycle centres.</p> <p>Nonetheless, based on verification through Google Earth, the wastes landfill at Bukit Sagu 04 Estate (GPS: 4° 2'24.55"N 103° 8'9.64"E), Bukit Sagu 06 Estate (GPS: 4° 2'23.77"N 103° 6'34.32"E) and Bukit Sagu 07 Estate (GPS: 3°59'4.95"N 103° 5'52.08"E), there are rivers within their 500 m radius distances. This is not in-line with the company's SOP Pengurusan Sisa Pepejal (Solid Wastes Management SOP) [doc. no.: FGVPM/L2/PAS-02, rev. 1, dated 23/01/2020], Clause 6.1.1.1.1 which reads: "<i>Pemilihan kawasan untuk dibuat tapak pelupusan - Mestilah 500 meter dari anak- anak sungai. Kedudukan tapak pelupusan mestilah berada dalam sekitar >500m dari kawasan penempatan penduduk</i>" (The location of landfill area must have a distance more than 500 m from river. It also must be more than 500 m from residential area.). Thus, a non-conformity report was assigned due to this lapse.</p>	<p>Non-compliance</p>
<p>7.3.2</p>	<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>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated as per sample sighted for SW disposal as following:</p> <p><u>Bukit Sagu POM</u></p> <ol style="list-style-type: none"> 1. SW409 – Disposed Contaminated Containers; Consignment Number: 2021982610AC1H84; Date: 16/08/2021; Quantity: 0.3600 Mt; SW Contractor: Pentas Flora (Kuantan) Sdn Bhd. 	<p>Non-compliance</p>

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		<p>2. SW305 – Spent Lubricant Oil; Consignment Note: 2021032216TRBV54; Date: 22/03/2021; Quantity: 0.1400mt; SW Contractor: Pentas Flora (Kuantan) Sdn Bhd.</p> <p>3. SW410 – Spent Filter; Consignment Note: 20210340114CBI9GV; Date: 22/03/2021; Quantity: 0.1400mt; SW Contractor: Pentas Flora (Kuantan) Sdn Bhd.</p> <p>4. SW322 Non-halogenated organic solvents were generated by the mill at the lab. It was noticed that</p> <ul style="list-style-type: none"> - The waste was not identified in the Waste Management Plan (Pengenalpastian Sumber & Jenis Bahan Buangan) - The waste inventory was not maintained and updated. - The date of generation was not available at the container used to store the waste in the laboratory. - There was no evidence of disposal under SW322 to DOE Licensed Contractor. - Interview with the lab personal indicated that they were unaware of the procedures of storage and disposal of SW322. <p>Therefore, a minor non-conformity was raised.</p> <p><u>Bukit Sagu 6, 7 & 8 Estate</u></p> <p>All scheduled waste is sent to Bukit Sagu 4 Estate’s Scheduled Waste Store which serves as the Centralized Collection Centre for all Scheduled Waste in the Certification Unit. Nevertheless, each operating unit maintains its own internal inventory of scheduled waste generated and stored in their</p>	
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		<p>scheduled waste store, prior to being sent to the centralized collection centre. Records were available for verification.</p> <p><u>Bukit Sagu 4 Estate</u></p> <ol style="list-style-type: none"> 1. SW305 – Spent Lubricant Oil; Invoice Number: S2108028; Consignment Note: 70046; Date: 25/08/2021; Quantity: 210 kg; SW Contractor; Greenverse Sdn Bhd 2. SW409 – Empty Chemical Containers; Invoice Number: S2108029; Consignment Note: 70028; Date: 10/08/2021; Quantity: 490 kg; SW Contractor; Greenverse Sdn Bhd 3. SW410 – Empty Chemical Containers; Invoice Number: S2108029; Consignment Note: 70046; Date: 10/08/2021; Quantity: 140 kg; SW Contractor; Greenverse Sdn Bhd 	
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Visit to the estates field and housing compound in Bukit Sagu POM complex confirmed that no open fire were been use for waste disposal.</p>	Complied
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
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>Management of soil fertility is guided by FGV's "<i>Manual Ladang Sawit Lestari</i>" (Oil Palm Plantation Sustainability Manual), Third Edition (2017), Section V: Manuring. It covers the applications of fertiliser for various stages of palm age and techniques. Recommendation of type of fertilisers and dosage is given by the agronomy unit through analysis of foliar and soil.</p>	Complied
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>Foliar and soil samplings were carried out by Internal Agronomist from Agronomy Advisory and Services Department prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in deciding the fertilizer requirements for the oil palms. The frequency for leaf sampling must be conduct for every year while for</p>	Complied

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		soil analysis, the frequency for soil sampling is conducted at 5 years intervals (ref.: Leaf and Soil Sampling Notes Procedure).	
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	Application of EFB was in place as part of the nutrient recycling strategy. Records of mulching was recorded in " <i>Buku Rekod Tandan Kosong</i> " (EFB Record Book) where information such as quantity of EFB and Field number is available.	Complied
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Records of fertiliser input were well maintained in various documents such as store issuance record, bin cards and month end account to name a few. Among the information available in the records was type of fertiliser, quantity and field number applied including date of application. <u>Bukit Sagu 4 Estate</u> 1. Field PM03K; Block 42; Area: 36.43 Ha; Program Month: July 2021; Fertilizer: NK Mixture (11.85mt); Application Date: 07/08/2021 2. Field PM12P; Block 29; Area: 67.95 Ha; Program Month: Feb 2021; Fertiliser: Fortified Organic Fertilizer (33.90 Mt); Application Date: 04/10/2021 – 05/10/2021. <u>Bukit Sagu 6 Estate</u> 1. Field PM10D; Area: 260.74 Ha; Program Month: April 2021; Fertiliser; Ammonium Chloride (FOF) – 80.20 mt; Application Date: 14/04/2021 – 27/04/2021. 2. Field PM13E; Area: 235.9 Ha; Program Month: June 2021; Fertiliser: NPK Mixture (107.35mt); Application Date: 01/06/2021 – 08/07/2021. <u>Bukit Sagu 7 Estate</u> 1. Field PM 98A; Area: 490.79 Ha; Fertiliser: NPK Mg; Total Mt: 93.00 mt; Application Date: 17/02/2021 – 09/06/2021.	Complied

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		2. Field PR 18D; Area: 328.55 Ha; Fertiliser: NPK Mg; Total Mt: 115.00 Mt; Application Date: 05/05/2021 – 05/08/2021.	
Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	Soil maps were made available for verification at all the sampled estates. The maps were provided by the Unit Komputer (GPS/GIS) from FELDA Agricultural Services Sdn Bhd. Among the major soil series at the estates are Bungor, Durian, Kedah and Malacca series. There was no soil categorised as marginal or fragile.	Complied
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	All estates visited had established maps showing the steep terrains in their estates. No replanting was conducted at slopes exceeding 25° in all estates visited. Visit to Bukit Sagu 06 Estate indicated that a total of 32.18 ha has been left undeveloped due to its gradient exceeding 25°. The area has been covered with natural vegetation and there were no traces of any activity being done by the estate management at the mentioned location.	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	There is no new planting of oil palm in Bukit Sagu Certification Unit. Steep terrains have been left abandoned and visit to the particular areas indicated that there were no activities being done on steep terrains and they are currently being covered with natural vegetation.	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Soil maps were available at all the sampled estates. Based on the maps, 100% of the soil at the estate is of mineral type. There is no soil categorized as fragile or marginal. In BS08, new planting area with total 61.54 Ha have demonstrated the long-term suitability as per C6-61 Improve soil fertility from the report of Proposed Development of Unplanted Area Covered About 61.54 Hectares	Complied

		into Oil Palm Plantation in Ladang Felda Global Ventures Plantation Malaysia Sdn. Bhd.	
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	There is no peat soil or soil categorized as marginal or fragile soil at the sampled estates.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys, soil maps, terrain maps were all available and used as a guidance during the replanting for drainage and road constructions in the replanting fields.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	Not applicable as there is no planting on peat soil within the estates.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	Not applicable as there is no planting on peat soil within the estates.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Not applicable as there is no planting on peat soil within the estates.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	Not applicable as there is no planting on peat soil within the estates.	Not Applicable

7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	Not applicable as there is no planting on peat soil within the estates.	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>- Critical (Major) compliance -</p>	Not applicable as there is no planting on peat soil within the estates.	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p>	Not applicable as there is no planting on peat soil within the estates.	Not Applicable

	- Critical (Major) compliance -		
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>Water Management Plan have been established and documented in "<i>Pelan Pengurusan Air</i>". Among the management plans established were:</p> <ul style="list-style-type: none"> - Evaluation of water consumption and water sources - Monitoring of negative impact to the environment - Steps to optimise water consumption through water saving method - Control of fertility and soil moisture - Monitoring of water management <p>Based on site visit at the workers quarters, clean water was adequately provided.</p>	Complied
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>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). Monitoring of discharge water quality conducted as per DOE requirement under the compliance schedule. Sample sighted in Bukit Sagu POM as following:</p> <ul style="list-style-type: none"> • Analysis Certificate: 3953/2021; Reference Number: (330) 4046/BS/810/3.8 PT.3; River Upstream & Down Stream (Alur Sungai Reman) Samples Received Date: 18/10/2021; Report Date: 27/10/2021; Lab ref. # 8700/2021 (Upstream); # 8701/2020 (Downstream); BOD result: 12 ppm (Upstream); 13 ppm (Downstream) <p><u>Bukit Sagu 6 Estate</u></p>	Complied

		<p>There are 2 rivers listed in the estate which are Sungai Rengoi and Sungai Endau. Visit to the Sungai Rengoi that flows through BS6 Estate indicated that a buffer has been established along the river. The buffer is well maintained and noticed to have natural vegetation well maintained. There were no traces of chemical or fertilizer application along the buffer zone. There were signages erected stating the prohibition of applying chemicals and fertilisers along the buffer zone as well. Monitoring of River Water Quality is conducted yearly, and results are obtained to monitor the water quality. Water Sampling was conducted on 12/10/2021 and the results indicated that both samples had all the parameters within the acceptable range.</p> <p><u>Bukit Sagu 7 Estate</u></p> <p>There are 3 rivers listed in the estate which are Sungai Rengoi, Sungai Reman and Sungai Endau. Visit to the Sungai Endau that flows through BS7 Estate indicated that a buffer has been established along the river. The buffer is well maintained and noticed to have natural vegetation well maintained. There were no traces of chemical or fertilizer application along the buffer zone. There were signages erected stating the prohibition of applying chemicals and fertilisers along the buffer zone as well. Monitoring of River Water Quality is conducted yearly, and results are obtained to monitor the water quality. Water Sampling was conducted on 28/09/2021 and the results indicated that both samples had all the parameters within the acceptable range.</p>	
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		<p><u>Bukit Sagu 8 Estate</u></p> <p>Visit to the Sungai Reman that flows through BS8 Estate indicated that a buffer has been established along the river. The buffer is well maintained and noticed to have natural vegetation well maintained. There were no traces of chemical or fertilizer application along the buffer zone. There were signages erected stating the prohibition of applying chemicals and fertilisers along the buffer zone as well. Monitoring of River Water Quality is conducted yearly, and results are obtained to monitor the water quality. Water Sampling was conducted on 29/09/2021 and the results indicated that both samples had all the parameters within the acceptable range.</p>	
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The mill applies the biological system with an anaerobic lagoon and tertiary plant (membrane plant) in series for its treatment of effluent. The quality of discharged effluent was analysed every week and the parameters are pH, BOD, COD, TS, SS, OG, AN and TN. Based on the quarterly report to the Department of Environment, generally, the Palm Oil Mill has complied with the regulated limit.</p>	Complied
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Water for FFB processing was sourced from water catchment. Water from the river was pumping into a water holding pond plant and used by the mill for FFB processing. The consumption was measured by a flowmeter and recorded in "<i>Kertas Semak Penggunaan Air Kilang Sawit</i>". Based on the records, the total consumption is 1.56 m3/mt FFB in 2020 and 1.51 m3/mt FFB in 2021 (as at Sep).</p>	Complied
<p>Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</p>			
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>The mill and estates consistently monitored their fossil fuel consumption and kept records in order to get the information about efficient consumption. Among the management plans to improve efficiency were to ensure mill operation is running smoothly without interruption, therefore maximise the usage of turbine and eventually minimise the usage of generator set; to practice maintenance of machinery (such as tractors, vehicles and shovel) on schedule and continuous education to operators</p>	Complied

		<p>who handle the machinery so that the unnecessary running hours can be minimised. The consumption of diesel was consistently monitored and recorded.</p>	
<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>			
<p>7.10.1</p>	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator which is submitted to the RSPO Secretariat.</p> <p>Based on verification of the ERML and/or SAP accounting system used by the company, some data were found to be not tally with the data reported in the RSPO's Palm GHG calculator for 2020, e.g.:</p> <p><u>Bukit Sagu 04 Estate:</u></p> <p>Total diesel: 53,603 lt (in ERML/SAP) vs. 60,616 lt (in GHG calculator)</p> <p>Total Mixture NK 12.6: 141,680 kg (in ERML/SAP) vs. 571,930 (in GHG calculator)</p> <p>Total NPK 9.5: 1,553,550 kg (in ERML/SAP) vs. 2,051,700 kg (in GHG calculator)</p> <p><u>Bukit Sagu 06 Estate:</u></p> <p>Total diesel: 23,161 lt (in ERML/SAP) vs. 21,286 lt (in GHG calculator)</p> <p>Apart from that, the records from Bukit Sagu 07 and Bukit Sagu 08 estates were not made available and therefore data in GHG calculator were unable to be verified. Thus, a non-conformity report was assigned due to this lapse.</p> <p>Identification of significant pollutants and greenhouse gas (GHG) emissions has been done e.g. POME, diesel/fuel and fertilizer. Their usage has been recorded and documented at each of the operating units.</p> <p>Identification of significant pollutants and greenhouse gas (GHG)</p>	<p>Non-compliance</p>

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		emissions has been done e.g. Land conversion, Emissions from Fertilizer, Emissions from peat, Fuel Consumption, and crop sequestration. Their usage has been recorded and documented at each of the operating units.	
7.10.2	(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). - Critical (Major) compliance -	For Bukit Sagu 08 Estate the new development area in 2019 has the HCVRN assessment which was conducted by consultant as per following public information: https://hcvnetwork.org/reports/hcv-chegar-perah-02-estate-bukit-sagu-08-estate-tembangau-05-estate-selendang-03-estate-malaysia/ For overall Bukit Sagu POM certification unit, a form entitled "Borang program pengurusan kualiti, alam sekitar, sosial, keselamatan & kesihatan pekerjaar" form #FGV/FGVPM/F(IMS)/3.2 Pind 1; date: 14/8/2020.	Complied
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -	Refer to indicator 7.10.1	Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Visit to the replanting areas in Bukit Sagu Estates within Bukit Sagu complex confirmed that the land for replanting is not prepared by burning. Interview with the workers and management indicated that they do not prepare land for replating by burning.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	All estates have established a "Pelan Pengurusan Kebakaran Ladang FGVPM Bukit Sagu 04/06/07/08 dated 20/10/2020. The plan includes potential fire outbreaks (such as fire at office, housing areas and fields) and Action Plan & Control Measures.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	All estates have established a "Pelan Pengurusan Kebakaran Ladang FGVPM Bukit Sagu 04/06/07/08 dated 20/10/2020. The plan includes potential fire outbreaks (such as fire at office, housing areas and fields) and Action Plan & Control Measures. The Plan has been communicated to all stakeholders	Complied

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		<p>as stated in the memo dated 20/10/2020 undersigned by each Estate Manager.</p> <p><u>Bukit Sagu 04 Estate</u></p> <p>Sighted the memo dated 12/01/2021 addressed to Kuari Tinjau Makmur and Ladang RISDA Cherul mentioning Bukit Sagu 04 Estate's commitment towards zero burning and request the mentioned neighbours not to conduct any open burning at their premises without permission from DOE for better management of the environment.</p>	
<p>Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>For Bukit Sagu 08 Estate new development area in 2019, HCVRN assessment was conducted by consultant as per following public information: https://hcvnetwork.org/reports/hcv-chegar-perah-02-estate-bukit-sagu-08-estate-tembangau-05-estate-selendang-03-estate-malaysia/ No new planting in other estates.</p>	Complied
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA</p>	<p>For Bukit Sagu 08 Estate new development area in 2019, HCVRN assessment was conducted by consultant as per following public information: https://hcvnetwork.org/reports/hcv-chegar-perah-02-estate-bukit-sagu-08-estate-tembangau-05-estate-selendang-03-estate-malaysia/ Nonetheless, conservation management plans for the existing plantations in other estates were implemented as per samples verified i.e. Laporan Biodiversiti Ladang FGVPM Bukit Sagu 07; Updated by: Yaslam bin Mohammad Salleh; CDD Department; Date: 14/12/2016 and Laporan</p>	Complied

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	<p>Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE:</p> <p>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>Biodiversiti Ladang FGVP Bukit Sagu 04; Updated by: Yaslam bin Mohammad Salleh; CDD Department; Date: 16/12/2016.</p>	
7.12.3	<p><i>Indicator is not applicable in Malaysia context</i></p>	<p>NA</p>	<p>Not Applicable</p>
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>For Bukit Sagu 08 Estate new development area in 2019, HCVRN assessment was conducted by consultant as per following public information:</p> <p>https://hcvnetwork.org/reports/hcv-chegar-perah-02-estate-bukit-sagu-08-estate-tembangau-05-estate-selendang-03-estate-malaysia/</p> <p>There was no new planting in other estates.</p>	<p>Complied</p>
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>There were no rights of local communities been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas. 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>Complied</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</p>	<p>Based on the biodiversity report, there was no RTE species found in all the estates. Nonetheless, the monitoring plan of wildlife was established and implemented. Education about the status of RTE has been given to</p>	<p>Complied</p>

	<p>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>workforce through a muster briefing from time to time. Signage to restrict hunting and intrusion have been put up at many places at the estates especially at the points of entry to create awareness among the workers and surrounding communities.</p>	
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>Educational activities on RTE species were done through a few means such as briefings/training and no hunting signage. Interview with workers showed that they have a good understanding in the restriction of hunting or endangering the RTE species.</p>	Complied
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>For Bukit Sagu 08 Estate new development area in 2019, HCVRN assessment was conducted by consultant as per following public information: https://hcvnetwork.org/reports/hcv-chegar-perah-02-estate-bukit-sagu-08-estate-tembangau-05-estate-selendang-03-estate-malaysia/ There is no land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018. Thus, the Remediation and Compensation Procedure (RaCP) is not applicable.</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2020 for Bukit Sagu Palm Oil Mill 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 2020 for Bukit Sagu Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.81
PKO	0.81

Extraction	%
OER	20.38
KER	4.70

Production	t/yr
FFB Process	224,330.00
CPO Produced	45,729.54
PKO Produced	10,542.83

Land Use	Ha
OP Planted Area	8,201.27
OP Planted on peat	-
Conservation (forested)	-
Conservation (non-forested)	12.60
Total	8,213.87

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	71941.26	0.65	-	-	-	-	71941.26	0.65
CO ₂ Emission from fertilizer	5420.91	0.05	-	-	-	-	5420.91	0.05
NO ₂ Emission from Peat	0	0	-	-	-	-	0	0
NO ₂ Emission from Fertiliser	4220.17	0.04	-	-	-	-	4220.17	0.04
Fuel Consumption	586.77	0.01	-	-	-	-	586.77	0.01
Peat Oxidation	0	0	-	-	-	-	0	0
Sink								
Crop Sequestration	-65628.94	-0.60	-	-	-	-	-65628.94	-0.60
Conservation Sequestration	-	-	-	-	-	-	-	-
Total	16540.17	0.15	-	-	28307.82	-	44847.98	0.15

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	-	-
Fuel Consumption	919.24	-
Grid Electricity Utilization	20.84	-
Credit		
Export of Grid Electricity	-	-
Sales of PKS	-	-
Sales of EFB	-	-
Total	940.08	-

Summary of Kernel Crusher Emission and Credit (if applicable)

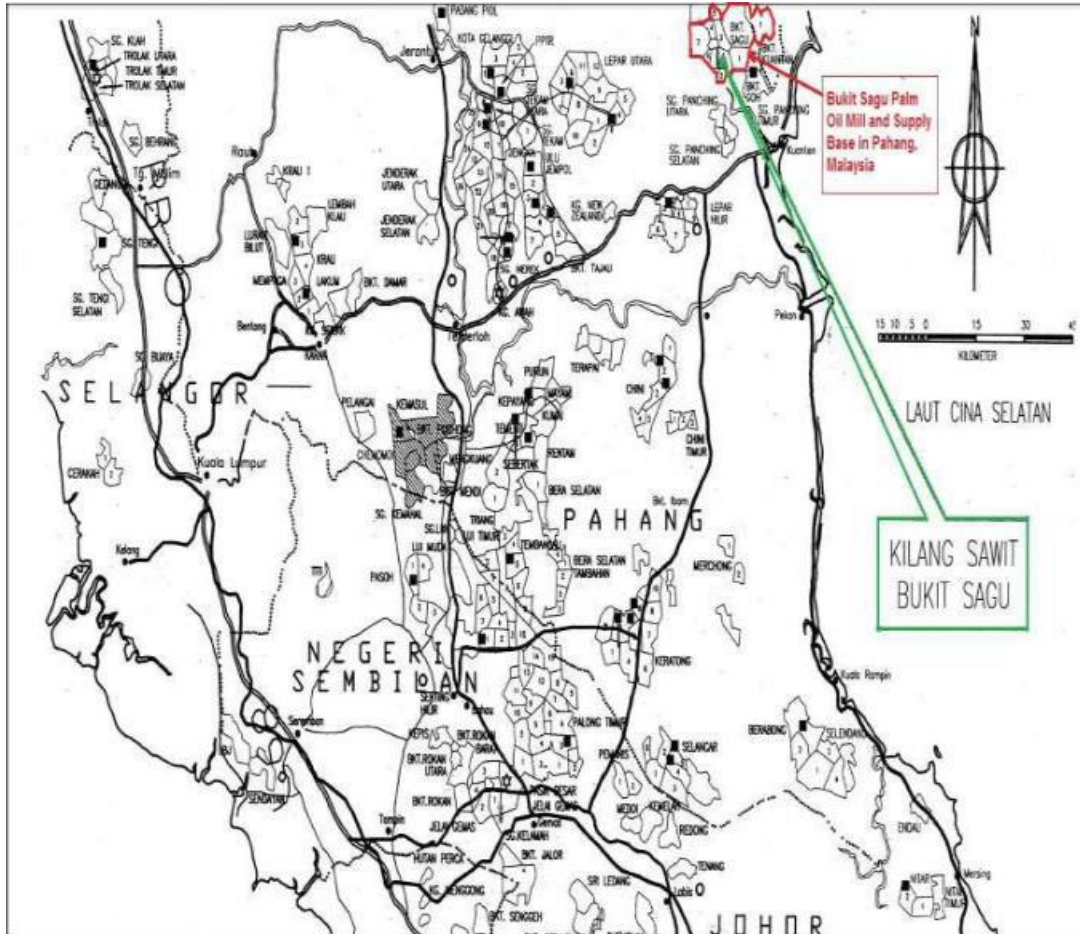
Emissions	tCO ₂ e
PK from own mill	-
PK from other source	-
Fuel Consumptions	-
Total Crusher emissions	-

*This mill has no kernel crusher operation.

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

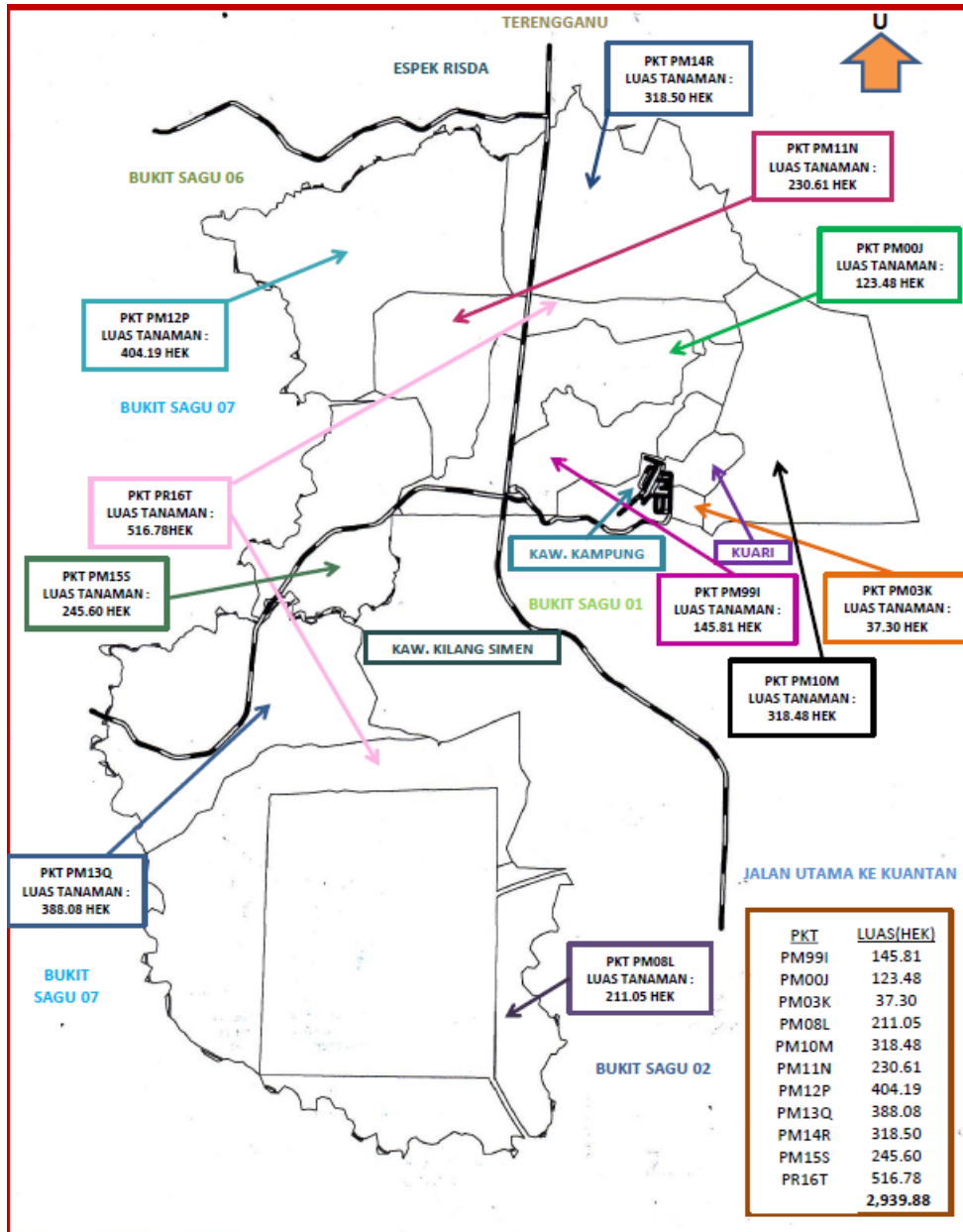
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	7
Divert to methane captured (flaring) (%)	93
Divert to methane captured (energy generation) (%)	-

Appendix C: Location Map of Certification Unit and Supply bases

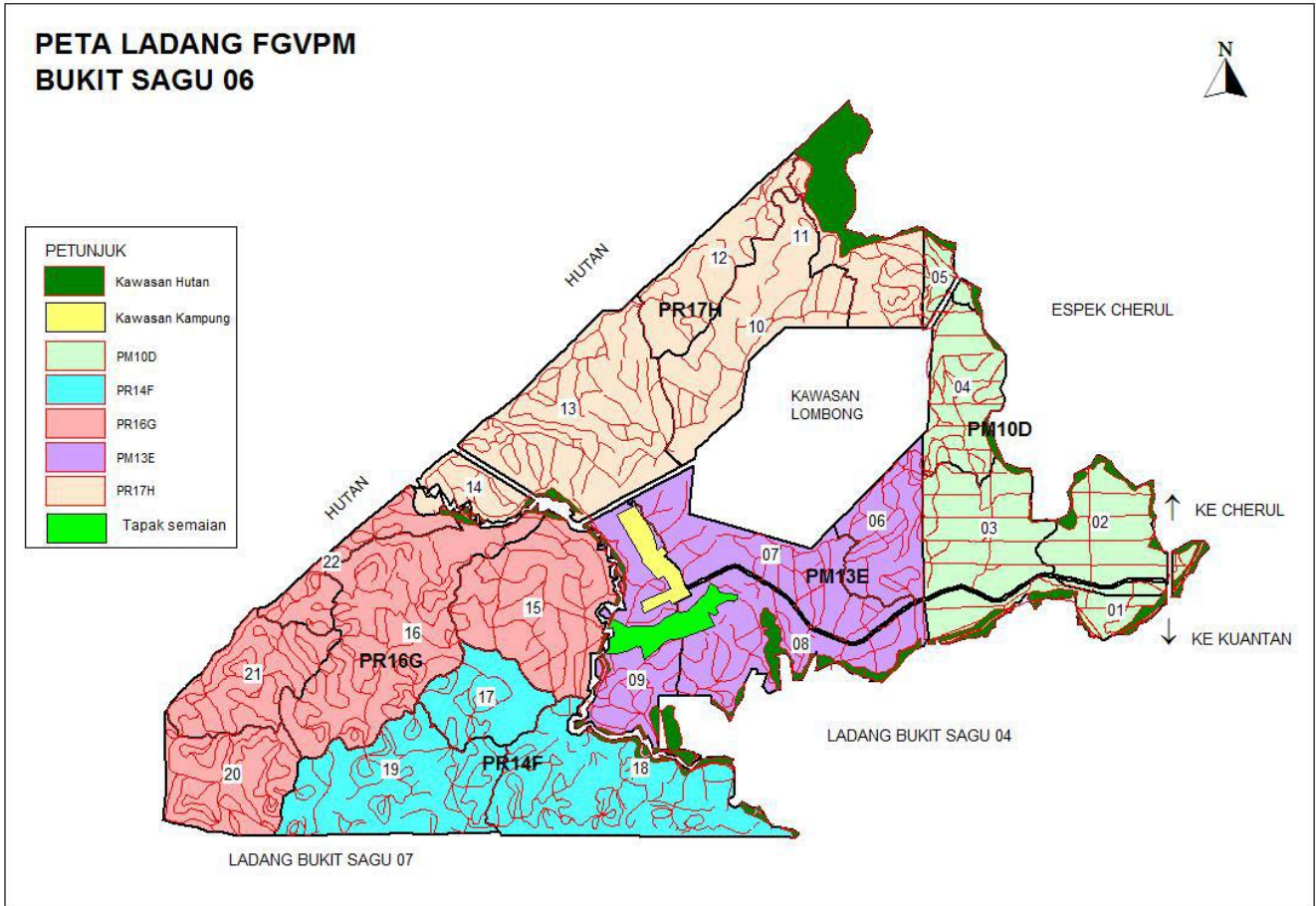


Appendix D: Estate Field Map

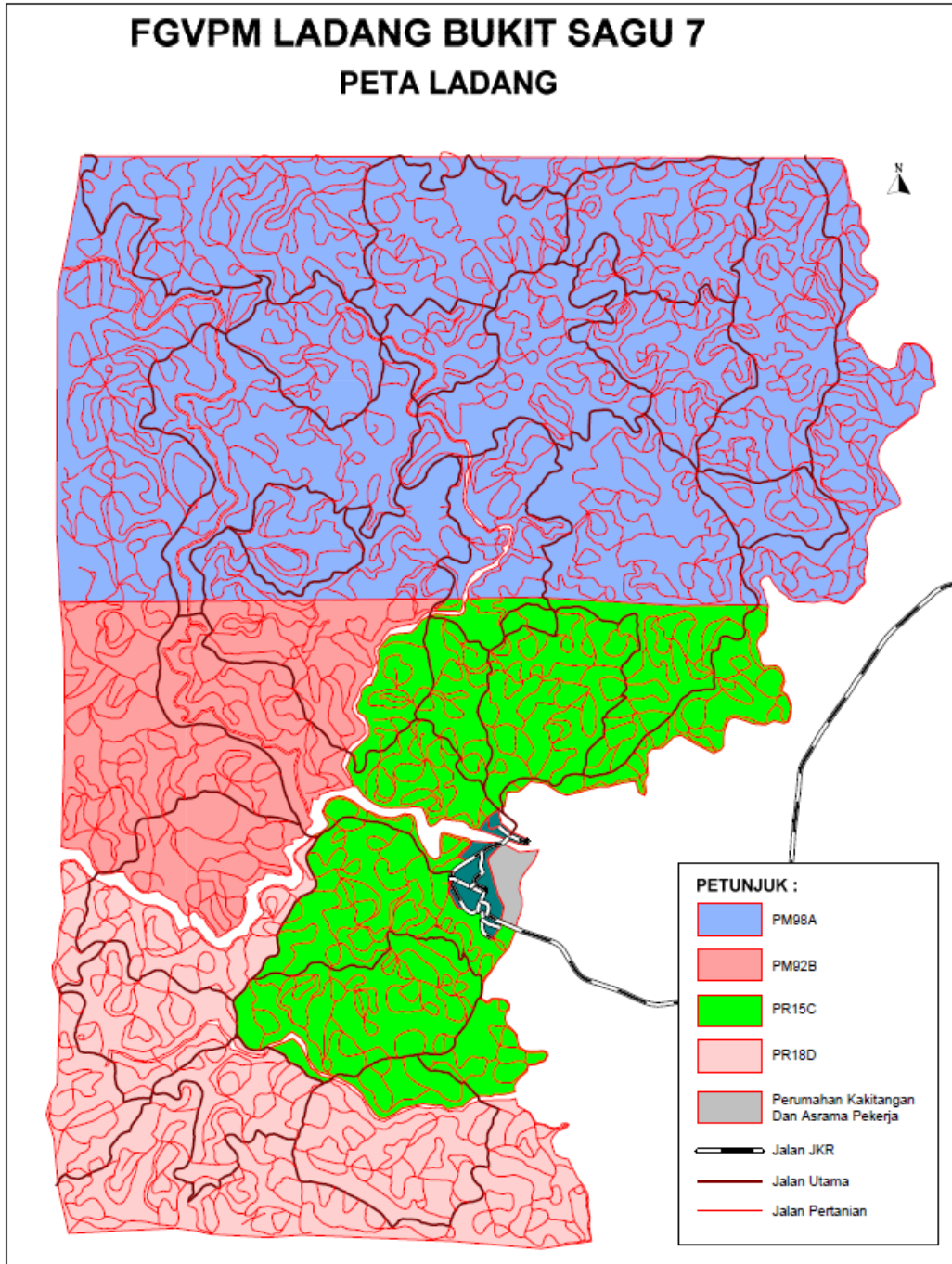
Bukit Sagu 04 Estate



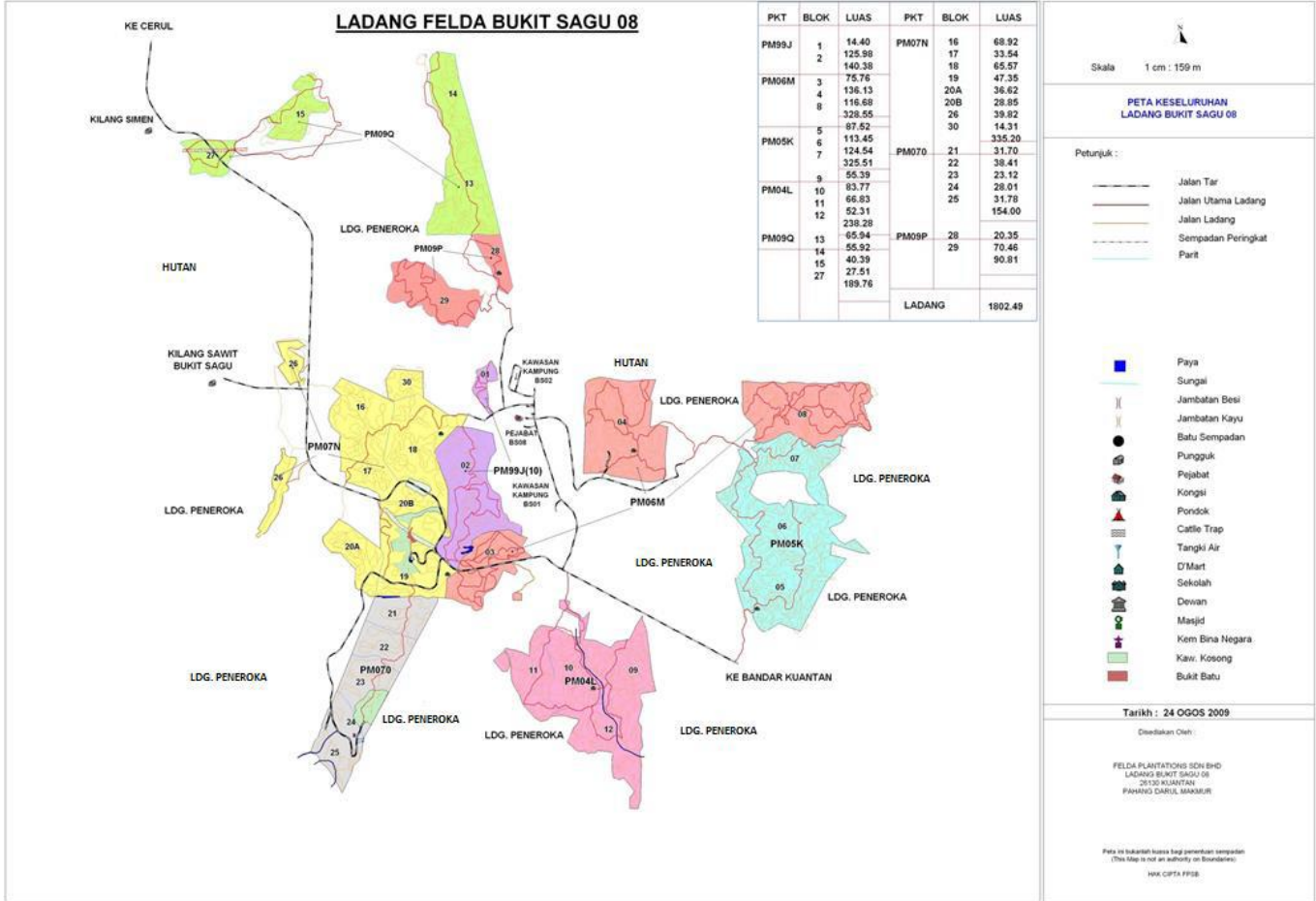
Bukit Sagu 06 Estate



Bukit Sagu 07 Estate



Bukit Sagu 08 Estate



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Appendix E: List of Smallholder Registered and sampled

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			
	NA								
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