

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (3)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client (Parent Company) FGV Holdings Berhad
Client company Address: Sustainability Compliance & Certification Department, Level 20, West Wisma FGV, Jalan Raja Laut 50350 Kuala Lumpur, Malaysia
Certification Unit: FGV Palm Industries Sdn Bhd (Kerteh Palm Oil Mill) Location of Certification Unit: Jalan Jerangau- Jabor Penghantar 3, Bandar Ketengah Jaya, 23309 Terengganu, Malaysia.
Date of Final Report: 16/04/2022

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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	Sustainability Compliance & Certification Department, 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 (Kerteh Palm Oil Mill) FGVPM Semaring 01 Estate FGVAS Kerteh Estate		
Location / Address	Jalan Jerangau- Jabor Penghantar 3, Bandar Ketengah Jaya, 23309 Terengganu, Malaysia.		
Website	http://www.fgvholdings.com		
Management Representative	Ameer Izyanif Bin Hamzah	E-mail	ameer.h@fgvholdings.com
Telephone	+603-2789 0497	Facsimile	+603-2789 0440

2. Certification Information			
Certificate Number	RSPO 693209	Certificate Start Date	11/02/2019
Date of First Certification	11/02/2019	Certificate Expiry Date	10/02/2024
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	To conduct a surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organisation's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		

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Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	54 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		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 693211	MS 2530-4:2013 (MSPO Part 4)	BSI Services Malaysia Sdn Bhd	28/04/2024
MSPO 693212	MS 2530-3:2013 (MSPO Part 3)	BSI Services Malaysia Sdn Bhd	28/04/2024
MSPO SCCS-TCI-021-2020	MSPO SCCS: Nov 2018	Trans Certification International (TCI)	26/03/2025

4. Location(s) of Mill & Supply Bases			
Name (Mill & Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
FGVPISB Kerteh Palm Oil Mill	Jalan Jerangau- Jabor Penghantar 3, 23309 Ketengah Jaya, Terengganu, Malaysia.	4° 37' 33.65" N	103° 19' 55.03" E
FGVPM Semaring 01 Estate	Ladang Felda Semaring 01, Pejabat Pos A.M.B.S, 23400, Dungun Terengganu, Malaysia	4° 40' 20.21" N	103° 02' 24.11" E
FGVAS Kerteh Estate	Ladang FASSB Kerteh, Jalan Kelubi, Ketengah Jaya, 23300 Dungun, Terengganu, Malaysia	4° 34' 29.00" N	103° 19' 13.00" 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 Semaring 01 Estate	981.05	0	265.42	1,246.47	78.70
FGVAS Kerteh Estate	100.94	0	11.01	111.95	90.17
Total	1,081.99	0	276.43	1,358.42	79.65

Note: FGVAS Kerteh Estate have conducted a land resurvey where they have identified the changes in land area as of 01/01/2020.

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		

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FGVPM Semaring 01 Estate	-	723.65	257.40	-	-	981.05	-
FGVAS Kerteh Estate	-	-	100.94	-	-	100.94	-
Total (ha)	-	723.65	358.34	-	-	1081.99	-

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Feb 2021 – Jan 2022)	Actual (Jan 2021 – Dec 2021)		Forecast (Feb 2022 – Jan 2023)
		Previous license period (Jan 2021)	Current license period (Feb 2021 – Dec 2022)	
FGVPM Semaring 01 Estate	16,600.00	64.59	1,314.55	16,000.00
FGVAS Kerteh Estate	2,900.00	130.35	2,015.31	3,000.00
Total	19,500.00	3,524.80		19,000.00

Note:

- FGVPM Semaring 01 Estate have diverted most of its FFB to a nearby external mill (KKS Felda Semaring) due to FGVPIB Kerteh POM being far from the operating unit.

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Feb 2021 – Jan 2022)	Actual (Jan 2021 – Dec 2021)		Forecast (Feb 2022 – Jan 2023)
		Previous license period (Jan 2021)	Current license period (Feb 2021 – Dec 2022)	
N/A		-	-	
Total		N/A		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Feb 2021 – Jan 2022)	Actual (Jan 2021 – Dec 2021)		Forecast (Feb 2022 – Jan 2023)
		Previous license period (Jan 2021)	Current license period (Feb 2021 – Dec 2022)	
Smallholders, Outgrowers & FFB Traders.	N/A	11,961.89	17,9651.71	N/A
Total	N/A	191,613.60		N/A

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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	Jan 2021	194.94	11961.89	12156.83
2	Feb 2021	179.83	9766.84	9946.67
3	Mar 2021	162.83	11339.75	11502.58
4	Apr 2021	150.50	12358.90	12509.40
5	May 2021	367.89	13861.53	14229.42
6	Jun 2021	402.98	12810.08	13213.06
7	Jul 2021	601.63	14907.53	15509.16
8	Aug 2021	258.23	14478.39	14736.62
9	Sep 2021	281.10	22534.23	22815.33
10	Oct 2021	225.95	23880.46	24106.41
11	Nov 2021	319.99	23392.55	23712.54
12	Dec 2021	378.93	20321.45	20700.38
TOTAL		3,524.80	191,613.60	19,5138.40

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (Feb 2021 – Jan 2022)	Actual (Jan 2021 – Dec 2021)		Forecast (Feb 2022 – Jan 2023)
	Previous license period (Jan 2021)	Current license period (Feb 2021 – Dec 2022)	
FFB	FFB		FFB
19,500.00 mt	194.94 mt	3,329.86 mt	19,000.00 mt
	3,524.80 mt		
CPO (OER: 20.50 %)	CPO (OER: 20.07 %)		CPO (OER: 20.70 %)
3,997.50 mt	36.61 mt	670.91 mt	3,933.00 mt
	707.52 mt		
PK (KER: 5.25 %)	PK (KER: 4.98 %)		PK (KER: 5.20 %)
1,023.75 mt	9.81 mt	178.66 mt	988.00 mt
	188.47 mt		
Note:			

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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	Jan 2021	36.61	9.81
2	Feb 2021	34.98	9.01
3	Mar 2021	32.75	8.61
4	Apr 2021	29.49	26.40
5	May 2021	70.74	17.47
6	Jun 2021	81.32	20.60
7	Jul 2021	115.39	20.60
8	Aug 2021	58.20	13.96
9	Sep 2021	59.82	14.17
10	Oct 2021	46.45	11.55
11	Nov 2021	67.61	16.90
12	Dec 2021	74.16	19.39
TOTAL		707.52	188.47

11. Summary of Actual Volume sold					
Current License period (Feb 2021 – Dec 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	0	0	0	0	0
PK (MT)	210.79	0	0	0	210.79
Credits	558.00	0	0	0	558.00
Previous License period (Jan 2021)					
CPO (MT)	0	0	0	0	0
PK (MT)	41.42	0	0	0	41.42
Credits	100	0	0	0	100
Note:					
1. Conventional is RSPO certified material but sold as non-RSPO.					
2. 308.34mt CPO carried forward from December 2020 to January 2021. (Previous License Period)					
3. 46.96mt PK carried forward from December 2020 to January 2021 (Previous License Period)*					
4. CPO Sold as Credits therefore physical volume sold as non-certified.					
*Sales of PK during current license period have exceeded the volume of PK produced in the mill. The mill has sold PK despite not having positive stock. Therefore, a Critical Non-Conformity has been raised under indicator 3.8.12.					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)

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No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	XXX	TR-eabd5b13-4676	0	124.45
2	XXX	TR-97b6b640-d342	0	86.34
3	XXX	TR-3667ebe7-0633	0	41.42
TOTAL			0	252.21

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

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

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
1	XXX	ST-TR-780f6844-3a7a	500
2	XXX	ST-TR-e1372dbf-440f	30
3	XXX	ST-TR-7a13fa1d-2bca	28
4	XXX	ST-TR-c20c798f-0afe	100
TOTAL			658

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year (Feb 2021 – Jan 2022)			Actual (Jan 2021 – Dec 2021)			Forecast (Feb 2022 – Jan 2023)		
	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	-	-		-	-		-	-	

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IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period						
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.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
Website: www.bsigroup.com

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2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **02/01/2022 – 05/01/2022**. The audit programme is included as Section 2.3.

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 **31/03/2022**. The audit programs are included in Section 2.3.

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

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

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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)
FGVPISB Kerteh Palm Oil Mill	✓	✓	✓	✓	✓
FGVPM Semaring 01 Estate	✓	✓	✓	✓	✓
FGVAS Kerteh Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: January 2, 2023 - January 5, 2023

Total Number of Mandays: 10 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Vijay Kanna Pakirisamy (VKP)	Team Leader	<p>Education: Holds a Bachelor Degree in Agribusiness Science Management with Honours, University Utara Malaysia.</p> <p>Work Experience: He has 10 years’ experience in Oil Palm Estate Management in leading Oil Palm Companies such as KL Kepong Bhd, IOI Plantations and United Plantations. The last position held was Senior Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He has been an sustainable palm oil auditor since 2019.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, HCV & HCS Training and SMETA Requirements Training, RSPO Independent Smallholder (IHS) Auditor Training..</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of Occupational, Health & Safety, HCV, Estate Best Practises and supply chain requirements.</p> <p>Language proficiency: He is fluent in English, Bahasa Malaysia, Tamil languages.</p>
Mohd Razaleigh Mohamad (MRM)	Team Member	<p>Education: Holds a Bachelor Degree in Plantation Management and Agro-technology, University Technology Mara (UiTM).</p> <p>Work Experience: He has 5 years’ experience in Oil Palm Estate Management with Tradewinds Plantation Berhad. The last position held was Senior Assistant Manager. He has more than 4 years of experience in Third Party Certification Audit with Control Union (M) Sdn Bhd for RSPO P&C, MSPO P&C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements.</p> <p>Training attended: He has completed ISO 9001-2015 Lead Auditor Course, ISO14001- 2015 Lead Auditor Course, ISO45001-2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed MSPO P&C Lead Auditor Course, Social Accountability SA8000 Auditor Course, RSPO Independent Smallholder (IHS) Auditor Training.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of legal, social, and stakeholder engagement.</p> <p>Language proficiency: He is fluent in Bahasa Malaysia and English languages.</p>
NorHalis AbuZar (NHA)	Team Member	<p>Education: Holds a Bachelor of Science in Plantation Technology and Management, University Technology Mara</p> <p>Work Experience: He has 6 years’ experience in Oil Palm Estate Management with Kulim Plantations Sdn. Bhd. The last position held was Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He is a qualified Lead Auditor for MSPO and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p>

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		<p>Training attended: He has completed ISO IMS 9001 and 14001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor Course, ISO 45001 Lead Auditor Course, ISO 9001:2015 Lead Auditor Course, MSPO SCCS Auditor Course and SMETA Requirement Training.</p> <p>Aspects covered in this audit: During this assessment, he assessed on the aspects of compliance to environment and Estate Best Practises.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English Language.</p>
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Accompanying Persons:

Name	Role
-	-

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1.3 Assessment Plan

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

Date	Time	Subjects	VKP	NHA	MRM
Saturday, 01/01/2022	1500 - 1900	Auditors travel to Dungun.	✓	✓	✓
Sunday, 02/01/2022 FGVPISB Kerteh Palm Oil Mill	0800 - 0900	Travel from Dungun to FGVPISB Kerteh Palm Oil Mill	✓	✓	✓
	0900 - 0930	Opening Meeting: - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).	✓	✓	✓
	0930 - 1230	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, Lab, weighbridge and palm product storage area, etc.	✓	✓	✓
	1000 - 1200	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	✓
	1230 - 1330	LUNCH BREAK			
	1330 - 1630	Document review P1 – P7: Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCCS general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Monday, 03/01/2022 FGVPM Semaring 01 Estate	0800 - 0900	Travel from Dungun to FGVPM Semaring 01 Estate	✓	✓	✓
	0900 - 1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	1000 - 1200	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	✓
	1230 - 1330	LUNCH BREAK			

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	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Tuesday, 04/01/2022 FGVAS Kerteh Estate	0800 - 0900	Travel from Dungun to FGVAS Kerteh Estate	✓	✓	✓
	0900 - 1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	1000 - 1200	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	✓
	1230 - 1330	LUNCH BREAK			
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
	Wednesday, 05/01/2022 FGVPISB Kerteh Palm Oil Mill	0800 - 0900	Travel from Dungun to FGVPISB Kerteh Palm Oil Mill	✓	-
0900 - 1200		Continue Document review P1 – P7 and Supply chain for CPO mill. RSPO SCCS general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	✓	-	✓
1200 - 1230		Verify any Outstanding Issues and Preparation for Closing Meeting	✓	-	✓
1230 - 1300		Closing Meeting	✓	-	✓
1300		Auditors travel back to Kuala Lumpur	✓	-	✓

Major Non-Conformity Closure Assessment Plan

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Thursday, 31/03/2022	0900 – 0930	Opening Meeting at FGVPISB Kerteh POM: - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan	✓
	0930 – 1230	1. Verification on Critical NC: • 2150978-202201-M1 • 2150978-202201-M2 2. Site observation, workers interview 3. Document review – implemented evidence	✓
	1230 – 1300	Closing Meeting	✓

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: 1. Issues pertaining membership as of now FGV management control has been taken over by FELDA through shareholder acquisition.	Complied

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	2. Mills and estates rationalization exercises effective June 2021.	
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	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.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	There are no lapses in implementation of the plan.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	There are no fundamental failure in implementation of the plan.	Complied
Un-Certified Units or Holdings		
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.	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.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	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.	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	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.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	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 recruitment costs, FGV has taken positive and further steps to ensure that the workers are well	Complied

	<p>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 programme has being carried out in phases in different locations starting June 2019.</p>	
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	<p>These action plans being developed and implemented through out 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:</p> <ol style="list-style-type: none"> 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>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.</p> <p>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). Issues raised during the session are being recorded and actions/resolutions being handled by respective projects.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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

Approved Time Bound Plan

TIME BOUND PLAN FORECAST FOR RSPO CERTIFICATION OF ALL FGV PALM OIL MILLS & SUPPLY BASES				
Palm Oil Mill	Supply Bases (estates, plantations, associations)			
	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 6	2017	MYNI 2019	
	FGVPM Bukit Sagu 07	2017	MYNI 2019	
	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	
	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	
KS BESOUT	FGVPM Besout 06	2018	MYNI 2019	Certified
	FGVPM Besout 07	2018	MYNI 2019	

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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 Semarang 01	2018	MYNI 2019	
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

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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
KS WA HA	FGVPM BUKIT APING SELATAN	2018	MYNI 2019	Certified
KS KALABAKAN	FGVPM Kalabakan Utara 01	TBC	TBC	

	FGVPM Kalabakan Selatan	TBC	TBC	Targeted to be certified in Year 2022
KS HAMPARAN BADAI	FGVPM Sahabat 23	TBC	TBC	Targeted to be certified in 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 in Year 2022
	FGVPM Umas 06	TBC	TBC	
KS PONTIAN FICO	Pontian Fico	TBC	TBC	Targeted to be certified in 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	

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	Blossom Plantation Sdn. Bhd	TBC	TBC	
KS TEMENTI	FGVPM Bera Selatan 1	TBC	TBC	Targeted to be certified in Year 2022
	FGVPM Bera Selatan 4	TBC	TBC	
KS SELANCAR 2A	External Suppliers	TBC	TBC	Targeted to be certified in Year 2022
KS BUKIT MENDI	External Suppliers	TBC	TBC	Targeted to be certified in Year 2022
KS JENGA 8	External Suppliers	TBC	TBC	Targeted to be certified in Year 2022
KS JENGA 18	External Suppliers	TBC	TBC	Targeted to be certified in Year 2022
KS JENGA 3	External Suppliers	TBC	TBC	Targeted to be certified in Year 2022
KS PADANG PIOL	External Suppliers	TBC	TBC	Targeted to be certified in Year 2022
KS TERSANG	External Suppliers	TBC	TBC	Targeted to be certified in Year 2022
KS KEMAHANG	External Suppliers	TBC	TBC	Targeted to be certified in Year 2023
KS CHINI 2	External Suppliers	TBC	TBC	Targeted to be certified in Year 2023
KS JERANGAU BARAT	External Suppliers	TBC	TBC	Targeted to be certified in Year 2023

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KS TROLAK	External Suppliers	TBC	TBC	Targeted to be certified in Year 2023
KS SEMENCHU	External Suppliers	TBC	TBC	Targeted to be certified in Year 2023
KS PANCHING	External Suppliers	TBC	TBC	Targeted to be certified in Year 2023
KS AIR TAWAR	External Suppliers	TBC	TBC	Targeted to be certified in Year 2023
KS LOK HENG	External Suppliers	TBC	TBC	Targeted to be certified in Year 2023
KS SG TENGI	External Suppliers	TBC	TBC	Targeted to be certified in Year 2023
KS PASOH	External Suppliers	TBC	TBC	Targeted to be certified in Year 2023
KS KAHANG	External Suppliers	TBC	TBC	Targeted to be certified in Year 2023
KS MEMPAGA	External Suppliers	TBC	TBC	Targeted to be certified in Year 2023
KS SAMPADI	FGVPM Sampadi 01	TBC	TBC	Targeted to be certified in Year 2023
	FGVPM Sampadi 03	TBC	TBC	
	FGVPM Sampadi 04	TBC	TBC	
	FGVPM Sampadi 05	TBC	TBC	
	FGVPM Sampadi 06	TBC	TBC	
KS KEMBARA SAKTI	FGVPM Sahabat 30	TBC	TBC	

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	FGVPM Sahabat 35	TBC	TBC	Targeted to be certified in Year 2023
	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 in 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 in 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 in Year 2023
	FGVPM Sahabat 12	TBC	TBC	
	FGVPM Sahabat 17	TBC	TBC	
	FGVPM Sahabat 56	TBC	TBC	
	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 in Year 2023
	FGVPM Sahabat 16	TBC	TBC	
	FGVPM Sahabat 55	TBC	TBC	
KS TENGGAROH TIMUR	FGVPM Tenggaraoh 12	2021	TBC	Targeted to be certified in 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	

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	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	
	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; One (1) Minor nonconformities and No Opportunity For Improvement raised. The FGVPIB Kerteh POM 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 Nonconformities) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2150978-202201-M1	Date Issued	05/01/2022
Due Date	04/04/2022	Date of nonconformity Closure	31/03/2022
Clause & Category (Critical / Minor)	3.4.2 (Critical)		
Statement of Nonconformity:	The effectiveness of the Environmental Management /Monitoring Plan was not fully demonstrated as the previously raised non-conformity were not effectively closed.		
Requirement Reference:	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.		
Objective Evidence:	The previous non-conformity stated as the corrective action plan to place rubbish bins. During the site visit to the location, it was found that there were no rubbish bins installed and it was notice that rubbish / household wastes were still improperly disposed at Field Peringkat 1 Blok D2. Due to reoccurrence of non-conformity, Major NC was raised.		
Corrections:	<ol style="list-style-type: none"> 1. Provide awareness to settlers and settlers' children about the consequences of dumping garbage everywhere and the consequences that will occur. 2. Together with the settlers clear the littering area immediately on the next day 		
Root Cause Analysis:	No awareness is given to settlers and settlers' children about the consequences of littering everywhere.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Hold a meeting with a representative of the settlers. 2. Hold a meeting with the management of Felda Kerteh 1,4,5, & 6. 3. Install a sign prohibiting littering. 4. Send a letter of notification to the management of Felda Kerteh 1,4,5 & 6. 5. Send a letter to the Mosque Committee Members, requesting to publicize the issue of garbage disposal everywhere and the consequences of pollution that will occur. 		
Assessment Conclusion:	<u>Critical Non-conformity On Site Verification</u> <ol style="list-style-type: none"> 1. The management have mentioned on the consequences of improper dumping of garbage during the <i>Mesyuarat Jawatankuasa Kemajuan Kampung Rancangan</i> (JKKR) which was helod on 13/02/2022, attended by 		

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	<p>representatives from the settler and community exco members. The meeting minutes was available for verification.</p> <ol style="list-style-type: none"> 2. The management of FGVPM together with the help of the community have cleared the rubbish at the mentioned location on 06/01/2022. Verification done indicated that rubbish were no more placed at the location. 3. A signboard stating "<i>Dilarang Membuang Sampah Di Kawasan Ini</i>" has been erected at the location previously dumped with rubbish. 4. A letter of notification has been sent to the management of Felda Kerteh 1, 4, 5 and 6 and to the Felda Kerteh 5 Mosque, requested that they broadcast the information to all on the prohibition of dumping rubbish along FGVAS Kerteh. The letter of notification dated 26/01/2022 was available for verification. <p>The evidence provided were able to address the non-conformity raised. Therefore, the critical nonconformity was successfully closed on 31/03/2022</p>
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Non-conformity			
NCR Ref #	2150978-202201-M2	Date Issued	05/01/2022
Due Date	04/04/2022	Date of nonconformity Closure	31/03/2022
Clause & Category (Critical / Minor)	3.8.12 (Critical)		
Statement of Nonconformity:	Transactions and record keeping of CPO and PK were not in accordance with the RSPO SCCS Procedure and RSPO Standard Requirements.		
Requirement Reference:	<p>For Mass Balance Module, the mill:</p> <ol 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). 		

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Objective Evidence:	<p>Based on the Mass Balance accounting system and Palm Trace announcement of CPO and PK sales, it was identified that the transactions and record keeping were not in accordance with the RSPO SCCS Procedure and RSPO Standard Requirements.</p> <ol style="list-style-type: none"> The mass balance records did not tally with the palm trace announcement volume as below: <ul style="list-style-type: none"> Mass balance records: Sales of Credit: 638 mt Palm Trace Announcement (Credit): 658 mt The sales of PK were from negative stocks and were not balanced within 3 months. The mass balance records did not capture the negative sales in its data sheet. Records as below. <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>Month</th> <th>Production</th> <th>Sales</th> <th>Balance</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td>bf: 26.73</td> </tr> <tr> <td>Apr-21</td> <td>26.40</td> <td>86.42</td> <td>-33.29</td> </tr> <tr> <td>May-21</td> <td>17.47</td> <td>-</td> <td>-15.82</td> </tr> <tr> <td>Jun-21</td> <td>20.60</td> <td>124.56</td> <td>-119.78</td> </tr> <tr> <td>Jul-21</td> <td>20.60</td> <td>-</td> <td>-99.18</td> </tr> <tr> <td>Aug-21</td> <td>13.96</td> <td>-</td> <td>-85.22</td> </tr> <tr> <td>Sep-21</td> <td>14.17</td> <td>-</td> <td>-71.05</td> </tr> <tr> <td>Oct-21</td> <td>11.55</td> <td>-</td> <td>-59.50</td> </tr> <tr> <td>Nov-21</td> <td>16.90</td> <td>-</td> <td>-42.60</td> </tr> <tr> <td>Dec-21</td> <td>19.39</td> <td>37.31</td> <td>-60.52</td> </tr> </tbody> </table>	Month	Production	Sales	Balance				bf: 26.73	Apr-21	26.40	86.42	-33.29	May-21	17.47	-	-15.82	Jun-21	20.60	124.56	-119.78	Jul-21	20.60	-	-99.18	Aug-21	13.96	-	-85.22	Sep-21	14.17	-	-71.05	Oct-21	11.55	-	-59.50	Nov-21	16.90	-	-42.60	Dec-21	19.39	37.31	-60.52
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Corrections:	<ol style="list-style-type: none"> PK sales can only be done when the stock balance 60.52mt has been replaced. The system has been updated whereby no deliveries can be made if the available stock is insufficient. Provide training on the new improved system towards the Weighbridge clerk. 																																												
Root Cause Analysis:	No mechanism to check on the stock prior to the certified PK delivery.																																												
Corrective Actions:	New mechanism had been included in the system whereby to check on the stock prior to the certified PK delivery.																																												
Assessment Conclusion:	<p><u>Critical Non-conformity On Site Verification</u></p> <ol style="list-style-type: none"> The Laporan Tahunan Kernel ISCC/RSPO/MSPO 2022 (as of 30/03/2022) was verified. <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>Month</th> <th>Production</th> <th>Sales</th> <th>Balance</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td>c/f (- 60.52)</td> </tr> <tr> <td>Jan 2022</td> <td>16.17</td> <td>0</td> <td>- 44.35</td> </tr> <tr> <td>Feb 2022</td> <td>12.74</td> <td>0</td> <td>- 31.61</td> </tr> <tr> <td>Mar 2022</td> <td>18.39</td> <td>0</td> <td>- 13.22</td> </tr> </tbody> </table>	Month	Production	Sales	Balance				c/f (- 60.52)	Jan 2022	16.17	0	- 44.35	Feb 2022	12.74	0	- 31.61	Mar 2022	18.39	0	- 13.22																								
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	<p>Based on the verification it was verified that there were no sales of PK done by the mill. The mill were in progress to recover positive stock of RSPO certified PK before commencing with any sales.</p> <ol style="list-style-type: none"> 2. It was verified that the system has been updated to trigger a warning stating that the stock is insufficient if there are less stock than the requested stocks to be sold. 3. A RSPO SCCS Training was conducted on 08/02/2022. The attendees, attended by the Asst. Manager, Weighbridge Clerk and System Assistants were briefed on identifying the stock balance before sales are done. The records of training were available for verification. <p>The evidence provided were able to address the non-conformity raised. Therefore, the critical nonconformity was successfully closed on 31/03/2022</p>
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Non-conformity			
NCR Ref #	2150978-202201-N1	Date Issued	05/01/2022
Due Date	Next Surveillance Audit	Date of nonconformity Closure	"Open"
Clause & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	The procedure of schedule waste management was not effectively implemented.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<ol style="list-style-type: none"> 1. During document verification at FGVP M Semaring 01 Estate, there was no evidence of SW Inventory being maintained in the estate for SW409 for the consignment disposed on 27/10/2021 (0.019kg). 2. During document verification at FGVAS Kerteh it was found that no inventory for schedule waste was being maintained. <p>This was against SOP "Pengurusan Bahan Buangan Terjadual Setiap Ladang" dated 23/01/2020 Ref. FGVP M/L2/PAS-04 section 6.5.1 "Kerani Bekalan mestilah mengemaskini rekod inventori bagi bahan buangan terjadual setiap Bulan".</p>		
Corrections:	<ol style="list-style-type: none"> 1. Existing staff should be given training or more detailed information on scheduled waste management. 2. Prepare schedule waste management effective Jan 2022 onward. 		
Root Cause Analysis:	Existing office workers lack the understanding to manage scheduled waste inventory records in detail.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Training or briefing to staff on scheduled waste inventory records. 2. Updating bin card. 		
Assessment Conclusion:	The corrective action plan is deemed to be sufficient to address the minor non-conformity raised. The effectiveness of the corrective action plan will be assessed during the next annual surveillance assessment.		

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Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Good commitment and corporation from the management.
PF 2	Positive feedbacks from internal and external stakeholders.
PF 3	Well maintained labour quarters at the mill and all estates.
PF 4	Generally well implementation of Good Agricultural Practices (GAP).

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2007530-202101-M1	Date Issued	07/01/2021
Due Date	06/04/2021	Date of nonconformity Closure	30/03/2021
Clause & Category (Critical / Minor)	3.6.2 (Critical)		
Statement of Nonconformity:	CHRA Action Plan was not effectively implemented.		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	<p>Semaring Estate: CHRA Report (HQ/08/ASS/00/85-2019-0049); Clause 8 Recommendations on Action To Be Taken, Page 24 states Chemical Sprayer; 6. To continue to conduct the medical surveillance for those affected employees by Occupational & Health Doctor at interval of no longer than twelve months duration.</p> <p>A sprayer, Hobib (Worker ID: FW 04880482) who joined on 7th December 2017 was scheduled to undergo Medical Surveillance on 14th November 2019 due to being exposed to hazardous chemicals. However, the mentioned worker was not sent to the Occupational & Health Doctor Panel in 2019 for Medical Surveillance.</p> <p>The worker has then only attended the Medical Surveillance on 3rd December 2020, whereby the period is more than 12 months from previous scheduled medical surveillance assessment</p>		
Corrections:	Sent the employee involved to undergo medical surveillance testing and received confirmation from clinic tested.		
Root Cause Analysis:	There is no confirmation conducted whether all employees who have been send for medical surveillance had undergone at the clinic for testing.		

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Corrective Actions:	<ol style="list-style-type: none"> 1. Always obtain confirmation of attendance and tested for medical surveillance testing from the clinic every time the testing process is carried out. 2. Discuss in Occupational Safety & Health meetings if there is an increase or change in employees must undergo medical surveillance tests.
Assessment Conclusion:	<p>Evidence of corrections and corrective actions verified:</p> <ul style="list-style-type: none"> - Letter to clinic for the medical surveillance for Mr. Hobib name with passport no. BQ0397094 number 6 in the list dated 3rd Dec 2020 - List of names confirmed by the clinic on the attendees and tested signed at bottom - Results of Mr. Hobib medical surveillance from the clinic dated 17th Dec 2020 - Appointment letter with tasks to the HEP personnel indicating the task of monitoring the medical surveillance conducted and confirmation without failure - List of name for the medical surveillance checkup 12 and 11 employees by stages dated on the 3rd Dec 2020 - List of names confirmed by the clinic on the attendees and tested signed at bottom - Confirmation of medical surveillance tested by the clinic for the 23 employees dated 25th Jan 2021 - Minutes of the existing OSH meeting discussed the important and confirmation of the attendees and tested during the medical surveillance <p>Evidence of corrections and corrective actions taken confirmed the CAP proposed were effective to address the issue. Hence, Critical NC was closed on 30/03/2021.</p> <p><u>ASA 3 Verification</u></p> <p>The estates conduct monthly health screening at the estate clinics by their own Medical Assistant and records were available for verification. Health surveillance are also done for the workers to identify general health conditions regularly. Records were available and verified as mentioned in indicator 7.2.10. All sampled workers especially sprayers were noted to have been sent for the medical surveillance. Hence the Critical Non-conformity remains closed.</p>

Non-conformity			
NCR Ref #	2007530-202101-N1	Date Issued	07/01/2021
Due Date	05/01/2022	Date of nonconformity Closure	Escalated to Major due to Reoccurrence of Minor Non-Conformity
Clause & Category (Critical / Minor)	3.4.2 (Minor)		
Statement of Nonconformity:	The environmental issues on the illegal dumping at Kerteh Estate was not identified in the Environmental Management /Monitoring Plan.		
Requirement Reference:	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders		

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Objective Evidence:	Kerteh Estate – 06/01/2021 Field Peringkat 1 Blok D2. Sighted rubbish / household waste improperly disposed at the site.
Corrections:	<ul style="list-style-type: none"> - Notifying to the proper channel attention to the settlers about the consequences of dumping garbage everywhere and the consequences that will occur. - Update the impact aspect form by including the issue of domestic waste disposal.
Root Cause Analysis:	<ul style="list-style-type: none"> - No notification or informed to the settlers about the consequences of dumping garbage everywhere. - The impact aspect report made no identification was made for the issue of domestic waste disposal on the farm.
Corrective Actions:	<ul style="list-style-type: none"> - Install rubbish bans. - Send a letter of notification to the management of Felde Kerteh 1,4,5 & 6. - Send a letter to the Members of the Mosque Committee, requesting to publicize the issue of garbage disposal everywhere and the consequences of pollution that will occur.
Assessment Conclusion:	<p>During the Recertification Assessment it was verified that there were still lapses in managing the wastes in the estates under the certification unit.</p> <ol style="list-style-type: none"> 1. Sighted letter to the management of Felde Kerteh 1,4,5 & 6 from DFVAS Kerteh Estate dated 14/01/2021. Refer notice "Larangan membuang Sampah Di Kawasan Ladang FGVAS Kerteh". Sighted evidence of photo and attendance by the management from Felde Kerteh 1,4,5 & 6. 2. Letter to members of the Msoque committee to publicize the issue of garbage disposal everywhere and the consequences of pollution that will occur has been given by the FGVAS Kerteh Estate dated 20/01/2021 with document reference number (2)820213501/AM/2021. 3. Awareness training to the Felde communities has been given on 11/02/2021. Refer training material "Penerangan Isu Pembuangan Sampah". Evidence of photos, attendance was sighted for this training. 4. Signage on prohibiting of illegal dumping has been placed at Field Peringkat 1 Blok D2 for creating awareness to the communities. <p>Nevertheless, the non-conformities raised cannot be closed because the corrective action plan was not effectively implemented. During the site visit to the location, it was found that there were no rubbish bins installed and it was notice that rubbish/household wastes were still improperly disposed at Field Peringkat 1 Blok D2.</p> <p>Hence the Minor non-conformity could not be closed and thus escalated to Critical Non-conformity as detailed under 3.4.2.</p>

Opportunity for Improvement	
OFI#	Description
OFI 1	OFI Statement: NA

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1680089-201804-M1	Major	2.1.1	14/09/2018	Closed out on 22/11/2018
1680089-201804-N1	Minor	5.1.2	14/09/2018	Closed out on 16/01/2020
1680089-201804-N2	Minor	4.7.5	14/09/2018	Closed out on 16/01/2020
1871877-201907-M1	Critical	3.6.1	16/01/2020	Closed out on 16/03/2020
1871877-201907-M2	Critical	6.2.1	16/01/2020	Closed out on 16/03/2020
1871877-201907-M3	Critical	7.10.1	16/01/2020	Closed out on 16/03/2020
1871877-201907-M4	Critical	7.8.2	16/01/2020	Closed out on 16/03/2020
1871877-201907-M5	Critical	2.3.1	16/01/2020	Closed out on 16/03/2020
1871877-201907-M6	Critical	3.4.3	16/01/2020	Closed out on 16/03/2020
1871877-201907-N1	Minor	2.2.2	16/01/2020	Closed out on 04/01/2021
2007530-202101-M1	Critical	3.6.2	07/01/2021	Closed out on 30/03/2021
2007530-202101-N1	Minor	3.4.2	07/01/2021	Escalated to 'Critical' due to Reoccurrence of Minor Non-Conformity on 05/01/2022
2150978-202201-M1	Critical	3.4.2	05/01/2022	Closed out on 31/03/2022
2150978-202201-M2	Critical	3.8.12	05/01/2022	Closed out on 31/03/2022
2150978-202201-N1	Minor	7.3.2	05/01/2022	"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 FGVPISB Kerteh POM 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)
Internal Stakeholder	KKD Chairperson (Gender Committee Representative)	Face to face Interview
Communities	Mat Armi bin Seman- JPkk Kampung Jongkok Batu	Face to face Interview
Internal Stakeholders	Mohd Faiz bin Sidek- Grocery store	Face to face Interview
Government School	Sekolah Menengah Ketengah Jaya	Face to face Interview
Vehicle Maintenance Contractor	Anuar Abdul Rahman	Face to face Interview
FFB Transport Contractor	Muhammad Zuraidi Sulaiman	Face to face Interview
Machineries Repair Contractor	Aziz Bin Jusoh	Face to face Interview
FFB Supplier	Ekstrapalma Sdn Bhd	Face to face Interview
External Stakeholders	FELDA Settlers	Face to face Interview

Stakeholders comment	
1	<p>Feedbacks: Sekolah Menengah Ketengah Jaya</p> <p>Most of kids from FGV Kerteh studied in Sekolah Menengah Ketengah Jaya and there is no issues has been raised from the representative of the school. It has been confirmed that POM and estate will respond of any request by the school. Good relationship has been maintained between both sites.</p>
	<p>Audit Team verification and response:</p> <p>The management of each operating units will try to maintain good relationship in the future. No further verification needed.</p>
2	<p>Feedbacks: FELDA Settlers</p> <p>Stakeholders request if possible for more contribution made by the operating units for the community.</p>
	<p>Audit Team verification and response: Management for each operating units will look into possibilities for contribution depending on the company budget. It will be further discuss during the management review meeting. Auditor noted with the respond by the management and will further verified during next assessment.</p>
3	<p>Feedbacks: Ekstrapalma Sdn Bhd - FFB supplier</p> <p>Good relationship has been established between FFB supplier and POM. There is no issues has been raised where consultation has been made to explain on FFB pricing calculation and payment. There is no issues on FFB deliveries and any information request.</p>
	<p>Audit Team verification and response:</p> <p>Management team will keep communicate the FFB pricing calculation and payment on annual basis to all FFB supplier. No further verification needed.</p>
	<p>Feedbacks: Muhammad Zuraidi Sulaiman- FFB transport contractor</p>

4	Contract agreement detailing all term has been signed by both parties and confirmed that stakeholders understand content of the agreement. Payment has been made on timely manner. The management of estate also monitor compliance of legal requirement for each contractor.
	<p>Audit Team verification and response: Management team will keep good relationship with contractor and will ensure that payment been made on timely manner. No further verification required.</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
Felda	Since 1971	As per Lease Agreement	Yes	No	Yes – Refer Indicator 4.4.1



Previous land owner / user comment	
NA	Feedbacks: -
	Audit Team verification and response: -

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 FGVPI Kerteh POM & Supply Base 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 FGVPI Kerteh POM & Supply Base is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: VIJAY KANNA PAKIRISAMY	Name: NOROLSAIFUL HAZRI BIN HAMID
Company Name: BSI SERVICES (M) SDN BHD	Company Name: FGV HOLDINGS BERHAD
Title: CLIENT MANAGER	Title: Sustainability Manager
<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> 
Date: 31/03/2022	Date: 04 APR. 2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>FGV has established SOP for information request from relevant stakeholders and documented in 'Komunikasi, Penglibatan dan Rundingan' 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 	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Information provided in both English and Bahasa Malaysia and accessible to all stakeholders in FGV Kerteh Certification Unit upon request. Policies & guidelines were available in the company's website: https://www.fgvholdings.com/sustainability/policies-guidelines/.</p>	Complied

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1.1.3	<p>(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p>The mill and estates within Kerteh Complex has implemented 'Buku Rekod Penerimaan Surat & Email' to record any request from stakeholders. Receiver and Manager will be acknowledged and responded if necessary. It was verified that the management of the respective units have responded to all the requests and enquiries in a timely manner.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -</p>	<p>FGV has developed procedure of 'Komunikasi, Penglibatan dan Rundingan' 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.</p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -</p>	<p>For FGV PISB Kerteh POM, There is evidence that the management of FGV PISB Kerteh POM has maintained stakeholders list and has been verified in the document title "Senarai Stakeholder" and has been categorize and few different categories. There are total 2 contractors has been listed which are Omar bin Abdul Rahman and Aziz bin Jusoh, Boiler Ash transporter.</p> <p>While for FGVPM Semaring Estate, there is 1 contractor has been appointed as FFB transporter Muhammad Zuraidi bin Sulaiman as internal auditor. While for external stakeholders, listed government agencies, local communities and NGOS. For FGVAS Kerteh, total 4 business has been listed which located nearby the estate area.</p>	Complied
<p>Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -</p>	<p>FGV Group Sustainability Policy (GSP) (Policy No.: FGV/SED/POL/001 dated 17/11/2020) was established. The purpose of the policy is to establish the objectives and guideline for FGV Holdings Berhad and its Group of Compliance for the fulfilment of FGV's commitment with regard to sustainability matter.</p>	Complied

		<p>Besides, Code of Business Conduct and Ethics (CoBCE) for Employees (Policy No.: FGV/GHR/POL/039, Rev. 4 dated 01/01/2020) was established which incorporated various aspect of committing to a code of ethical conduct and integrity.</p> <p>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 are accessible by the stakeholders via www.fgvholdings.com/sustainability/.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>Implementation and monitoring of the compliance of the policy was conducted through agreement and the Supplier Code of Conduct (SCOC) FGV Holdings Berhad; Doc. Version: 001.05.2020; Doc. Owner: FGV Group Procurement. Sample has been taken for some contractor</p> <ul style="list-style-type: none"> a. Muhammad Zuraidi bin Sulaiman, FFB transporter for Semaring Estate. b. Raja Ismail Raja Daud c. Annuar Abdul Rahman, vehicle maintenance 	Complied
<p>Principle 2: Operate legally and respect rights</p>			
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>Kerteh POM and its Supply Bases continued to comply with all applicable legal requirements. Compliance to each applicable law and regulation are monitored by the operating units. The certification units obtained and renewed licenses and permits as required by the law. Among others, the licenses/permit verified were:</p> <p><u>FGVPISB Kerteh POM</u></p>	Complied

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		<ol style="list-style-type: none"> 1. MPOB License; License Number: 500178404000; License Validity Period: 01/04/2021 – 31/03/2022; Approved Yearly Processing Capacity: 259,200 Mt. 2. Energy Commission – Private Installation License; License Number: 2021/01421; Serial Number: 50334; License Validity Period: 14/06/2021 – 13/06/2022. 3. DOE License (Compliance Schedule); License Number: 004053; License Validity Period: 01/07/2021 – 30/06/2022. 4. Permit Barang Kawalan Berjadual; Serial Number: P(T 000205); Reference Number: TR/DGN/12/08 SKD; Description: Diesel; Storage Quantity: 20,000 Litres; License Validity Period; 13/01/2021 – 12/01/2022. <p><u>FGVPM Semaring 01 Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 560381002000; License Validity Period: 01/05/2021 – 30/04/2022. 2. Permit Barang Kawalan Berjadual; Serial Number: P(T 000105); Reference Number: TR/DGN/92/07 SKD; Description: Diesel (8, 500 Litres) & Petrol (300 Litres); License Validity Period: 19/05/2021 – 18/05/2024. <p><u>FGVAS Kerteh Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 502671002000; License Validity Period: 01/04/2021 – 31/03/2022; Estate Area: 111.95 Ha. 	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Identification and documentation of applicable legal requirements is guided by Manual Procedure, Legal and Other Requirements (FPI/L2/QOSHE 2.0, 29/11/2016).</p>	Complied

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		<p>The applicable legal requirements for the mill and estate were registered in "Daftar Perundangan dan Lain-lain Keperluan" (Register of Legal and Other Requirements) (FPI/L4/QOSHE-2.1 Pind 0) which was last updated on:</p> <ol style="list-style-type: none"> 1. FGVPIB Kerteh POM: 06/10/2021 2. FGVPM Semaring 01 Estate: 26/12/2021 3. FGVAS Kerteh Estate: 30/11/2021 <p>The register has info about Legal and Other Requirements, Enforcement Body, Main requirement, Enforcement standard, Penalty (RM), Responsible Departments and Compliance status.</p> <p>Tracking system to identify changes in the relevant regulations were available through the head office, website information and is communicated from the Group Head Office. Sighted the latest review to include new updates for Workers Minimum Standards of Housing and Amenities (Amendment) Act 2019, Minimum Wages Order 2020, Auxiliary Police Regulations 1970 & Akta Pencegahan & Pengawalan Penyakit Berjangkit 1988 (Movement Control Order 2020).</p> <p>On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operation. Tracking system on any changes in the law had been well implemented.</p>	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p><u>FGVPIB Kerteh POM</u></p> <p>The Mill is located on the Felde Kerteh 02 land. The agreement between Felde Kerteh 02 dated 25/11/1996 stated FGVPI has been granted permission to occupy 19.78 Ha for the purpose of an oil palm mill. The agreement was available for verification. The mill is clearly demarcated with fences surrounding the area.</p> <p><u>FGVPM Semaring 01 Estate</u></p>	Complied

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		<p>The estate boundary was clearly demarcated with boundary trenches. During the visit at Field P11C Block 2 boundary with a private vacant land, the boundary was clearly demarcated with a road separating the two boundaries. Visit to Field P13E Block 10 boundary with Chemerong Forest Reserve, the boundary was clearly demarcated with boundary trenches.</p> <p><u>Kerteh Estate</u></p> <p>Visit to the estate boundary at Field D 2005 (Block D2), Boundary with Felda Kerteh 5, the boundary was clearly demarcated with the main road. Visit to the Field D 2005, Block D5, Boundary with Felda Kerteh 5 (Smallholder) was clearly demarcated with security trenches</p>	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>Details of contracted parties maintained in computerized FGV system, eDaftar as well as in summary of all vendors among contractors and suppliers in stakeholder list.</p> <p>For FGVP Semaring 01 Estate, list of contracted parties has been listed in the list of stakeholder document title "stakeholder dalaman" where there is 1 contractor has been appointed for FFB transport that are Muhammad Zuraidi bin Sulaiman and sighted the contract agreement in the document title Surat Perintah Kerja dated 14/06/2021 that has been signed both parties.</p> <p>While for FGVAS Kerteh, total 2 contractors has been listed in the stakeholders list which are Raja Ismail Raja Daud, harvesting and FFB transport contractors and Anuar Abdul Rahman, vehicle maintenance contractor.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p>	<p>The operating units maintain list of contracted parties as parts of their stakeholders includes internal (within Kerteh POM and supply base) such as employee and workers union and external</p>	Complied

	<p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>stakeholders such as FFB suppliers, contractors, transporters and government department.</p> <p>Suppliers in general has been briefed and provided with FGV Supplier Code of Conduct (SCOC); April 2019 prior to contractual engagement. The SCOC also available via FGV company’s website internet link as per following: http://www.fgvholdings.com/wp-content/uploads/2019/07/Supplier-Code-of-Conduct-SCOC.pdf where the SCOC were specified relevant terms of Labour Standards as well as legality to be complied with by suppliers.</p> <p>For contractors, they are required to employed legal workers based on FGV Foreign Workforce Department Guidelines and Procedures for Responsible Recruitment of Foreign Workers; Doc. # FGV/FGVPM-JTK/POL/001; Rev. 0; Approved by Group CEO; Date: 27/6/2019. As evidence of due diligence, the contractors provided the list of employee with a copy of insurance. Sighted the sampled due diligence of Foreign Labour Recruitment Verification Audit Report - Lombok Nusa Tenggara Barat, Indonesia; Prepared by Norolsaiful Hazri Hamid; Manager, Sustainability Compliance & Certification Enforcement; Assessment Period: 4-8/11/2019</p> <p>Assessment conducted of following agencies:</p> <ol style="list-style-type: none"> a. PT Nusa Sinar Makmur b. PT Kjang Lombok Raya c. PT Ruyung d. PT Pamor Sapta Dharma e. PT Suskes Mandiri Utama 	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>Suppliers in general has been briefed and provided with FGV Supplier Code of Conduct (SCOC); April 2019 prior to contractual engagement. The SCOC also available via FGV company’s website internet link as per following: http://www.fgvholdings.com/wp-</p>	Complied

		<p>content/uploads/2019/07/Supplier-Code-of-Conduct-SCOC.pdf where the SCOC were specified relevant terms of Labour Standards as well as legality to be complied with by suppliers. All the contractors and suppliers have briefed and signed on the Supplier Code of Conduct (SCOC) where it has contained the clauses as below:</p> <ol style="list-style-type: none"> 1. Suppliers shall not employ child labour 2. Suppliers must not use forced, bonded or indentured labour or involuntary prison labour. 	
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
<p>2.3.1</p>	<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>The mill has 2 estates supplying FFB within the certification scope and 28 supply base supplying FFB from outside the certification scope (19 estates, 7 collection centres and 2 smallholders). The mill has compiled the evidences for all its suppliers on the 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 and valid MPOB license. Sampled the documents as below:</p> <ol style="list-style-type: none"> 1. Wong Tee Boon (67020711XXXX); MPOB License Number: 41724081000; License Validity Period: 03/01/2019 – 31/12/2023; Smallholder Area; 14.34 Ha. 2. Chua Ee Lye (58071001XXXX); MPOB License Number: 240782401000; License Validity Period: 01/05/2020 – 30/04/2025; Smallholder Area: 3.9120 Ha. 3. Siti Aminah Binti Abdullah (Dealer); License Number: 505487015000; License Validity Period: 01/08/2021 – 31/07/2022. 	<p>Complied</p>

2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>There are 7 collection centres registered in the mill's list of FFB suppliers. The mill is in the process of obtaining the information mentioned in Indicator 2.3.1 of the 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><u>FGVPISB Kerteh POM</u></p> <p>The mill has available a business management plan in the form of an Annual Budget 2022 to guide the management and expenditure for the year. A 5 years business management plan (2022 – 2026) is available to include Operational Parameters (FFB), FFB Processed, OER, CPO, KER, and PK among others.</p> <p><u>FGVAS Kerteh Estate</u></p> <p>A business management plan in the plan of a Budget for 2022 till 2026. (Detailed Summary of Organisation Revenue and Expenditure – FGVASSB Stesen Kerteh. The budget details the Operational expenses, Labour Expenses, Management Expenses and depreciation 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>Both estates have a relatively prime age of Oil Palm planting in the estate. As of now there are no plans to conduct any replanting for the next 5 years. Oldest palm planting year for the FGVP M Semaring 01 Estate was year 2011 while at FGVAS Kerteh Estate was Year 2005.</p>	Complied
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Management Review is conducted annually to address the issues on non-conformities raised during internal audits, customer feedbacks, production performance, environmental & social issues, and</p>	Complied

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		<p>continuous improvement plans. The management review meeting minutes were available for verification as below:</p> <ul style="list-style-type: none"> • FGVPISB Kerteh POM conducted on 14/10/2021 • FGVP M Semaring 01 Estate conducted on 12/10/2021 • FGVA S Kerteh Estate conducted on 03/12/2021 <p>Among the topic discussed in the management Review Meeting were:</p> <ul style="list-style-type: none"> • Introduction • Audit Result • Customer feedback • Production report • Environment • Social • Replanting • Continuous Improvement • Management review 	
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The estates and mill have established the main social and environment improvement plans as stated in the Continuous Improvement Plans. The Continues Improvement Action plan have been developed based on the areas and issues of concern that have been raised. Among the plans highlighted were as below:</p> <p><u>FGVPISB Kerteh POM</u></p> <ol style="list-style-type: none"> 1. Maintenance Repairs for Workers Quarters. 	Complied

		<ol style="list-style-type: none"> 2. Conduct regular activities for Gender Committee. 3. Zero Accidents at the mill 4. Ensure BOD Final Discharge maintained below 100 ppm. 5. Reduce the usage of Diesel below 0.40 litres/FFB for the year. <p><u>FGVPM Semaring 01 Estate</u></p> <ol style="list-style-type: none"> 1. To achieve FFB yield > 13.60 mt/ha and cost/mt < RM 315.75 2. Zero Open Burning 3. Reduce the usage of Pesticides. 4. Continuously conduct workers welfare meetings. 	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>RSPO metric template version 2.1 is used for the reporting of FGVPI SB Kerteh Certification Unit's metrics (economic, social and environment). Data reporting period is January to December 2021 for (social and environment metrics) and economic metrics from Dec 2020 – Nov 2021 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p>	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Verified SOP for the mill operation. The mill processing system is documented in the following documents among others: -</p> <ol style="list-style-type: none"> a. The Mill Lestari Processing Manual b. Mill Standard Operating Procedure, c. The Mill Quality Management Manual 	Complied

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		<p>These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from the reception, sterilization, threshing, pressing, clarification, depericarping (nut polishing) station, effluent, laboratory, workshop, dispatches etc. In addition, there are also manuals available within the industry and MPOB that are used as guidelines.</p> <p>The standard operation procedure SOP for the estates operations is available which is prepared on Group basis. There are levels of the documentation identified as follows;</p> <ul style="list-style-type: none"> a) Manual Ladang Sawit LESTARI on reviewed 1/6/12 Sawit pra matang edisi II seksyen 3 b) Manual Ladang Sawit LESTARI reviewed on 1/6/12 Sawit matang edisi II seksyen 4 c) Manual Ladang Sawit LESTARI 1/6/12 Pembajaan sawit edisi II seksyen 5 d) Prosedur Kerja Selamat e) Manual Kelestarian (Sustainability). Amendments are made should there be requirement to suit the local issues/situation. 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>The Agronomy and Agricultural Services Department, Sustainability Unit, Plantation Head and relevant Head Office personnel including the Regional Controller inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Other mechanism as described below.</p> <p><u>FGVPISB Kerteh POM</u></p> <p>RC Visit: 01/08/2021 by Mr Miswan Bin Sarip</p> <p>Internal Audit: 02/12/2021 by Mr Mohd Khairil Mohamad</p>	Complied

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		<p><u>FGVPM Semaring 01 Estate</u> Agronomy Visit: 12/10/2021 by Mr Mohd Khairil Mohamad RC Visit: 13/09/2021 by Mr Miswan Bin Sarip Internal Audit: 27-30/09/2021 by Mr Hilmie Zalfuez Bakhari</p> <p><u>FGVAS Kerteh Estate</u> Agronomy Visit: 11/11/2021 by Mr Mohd Khairil Mohamad Internal Audit: 15-18/11/2021 by Mr Barath Munasamy</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available. - Minor Compliance -</p>	<p>Operating units visited maintained all records of monitoring and available for review. The Regional Controller (RC) are accountable to monitor the estates compliance towards the SOP, budgets, and productivity among others. Estates / Mill performances are reviewed during the monthly meeting with RC. Verified action plan report for the issue raised by the RC.</p>	Complied
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<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. - Critical (Major) compliance -</p>	<p>Social and Environment Impact Assessment for operating unit has been conducted and published on January 2021. The assessment was done by Sustainability Compliance And Certification Department, Group Sustainability Division, FGV Holdings, Mr Azwan Muhammad and Mr Ahmad Akram Abdul Jalal. There are evidences that the assessment has involved the affected stakeholder such as internal workers (local and foreigner), contractor workers, neighbouring estates and communities and FFB supplier. There were no new planting in both the estates visited.</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 social impact assessment (SIA) for both POM and estates has been established in the document title "Pelan Pengurusan (Management Plan) bagi Impak Sosial (negative). In additional , recommendation by the assessor for the management plan has been attached in the same report.</p> <p>The previous non-conformities raise on the illegal dumping at Kerteh Estate was not identified in the Environmental Management /Monitoring Plan" and therefore cannot be closed because the corrective action plan was not effectively implemented.</p> <p>During the site visit to the location, it was found that there were no rubbish bins installed and it was notice that rubbish / household wastes were still improperly disposed at Field Peringkat 1 Blok D2. Due to reoccurrence of non-conformity, a critical NC was raised.</p>	Non-compliance
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The Social/Environmental Action Plan 2021 available for each units were available having information i.e. issues, management plan, PIC and time frame. The input are gathered from the meeting minutes among others;</p> <ul style="list-style-type: none"> a. Gender Committee, union b. Safety Meeting, c. Complaint & Request from internal & external stakeholders d. Management meeting at estates/mill and regional level. e. Dialogue during the morning muster. f. Interview approach with employees. 	Complied
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>FGV has developed SOP for 'Proses Sosialisasi & Temuduga' with Doc. No.: FGV/JTK/POL/001 for recruitment of foreign workers and 'Perlantikan PBH (Pekerja Artian dan Operasi Ladang' with Doc.</p>	Complied

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	<p>- Minor Compliance -</p>	<p>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 available in company's website, https://www.fgvholdings.com/wp-content/uploads/2020/02/FGV-Group-Guideline-and-Procedures-</p>	
<p>3.5.2</p>	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<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>Both Kerteh POM and Semaring 01 Estate has published advertisement for any job vacancy available. Sighted sample recruitments made by Kerteh POM of new employee as following:</p> <ul style="list-style-type: none"> - Employee name: Anisa Najmie binti Zaib; Post: General Worker Grade 7(T); Date joined: 01/02/2021 - Employee name: Bibi Roihan Binti Abdul Rahman; Post: General Worker Grade 7(T); Date joined: 1/7/2020 <p>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>	<p>Complied</p>
<p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			

<p>3.6.1</p>	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -</p>	<p>FGVPISB Kerteh Operating Units have conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The HIRARC is guided by the document Guidelines for Hazard Identification, Risk Assessment and Risk Control (HIRARC), Department of Occupational Safety and Health, 2008. The assessment covers all main operations and support operations.</p> <p><u>FGVPISB Kerteh POM</u></p> <ol style="list-style-type: none"> 1. HIRARC was available in the mill to identify assess and provide controls for all the risks associated to the operations in the mill. Sighted the HIRARC for Felsco Station, Oil Room, Crane & Threshing and Boiler. 2. Chemical Health Risk Assessment was conducted in the mill by IFZ Medical Supplies (CHRA REG NO: JKPP HQ/16/ASS/00/18) on 02/08/2018 – 01/09/2018. The CHRA Report (JKPP HQ/16/ASS/00/18-2018(007)) was available for verification. 3. Medical & Health Surveillance was conducted for the year 2020 on 05/12/2020 by IFZ Medical Supplies. A total of 32 workers were examined and results indicated that all workers were fit to work with no occupational related diseases. 4. Noise Risk Assessment was conducted in accordance with the requirements under OSHA (Noise Exposure) Regulation 2019 for Kerteh Palm Oil Mill by Allion HSE Sdn Bhd (Assessor No: HQ/08/PEB/00/84) on 28/04/2020. The NRA Report (Report No: AH/20/08/17) was available for verification. 5. Annual Audiometry Examination was conducted for workers exposed to excessive noise in the mill. The examination was conducted on 05/12/2020 – 16/12/2020 for a total 60 workers. The results indicated that 10 workers had normal audiograms, 	<p>Complied</p>
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		<p>14 with hearing impairment, 19 with standard threshold shift and 17 with hearing loss. Retest Audiometry for STS cases and Physical examination for hearing impairment cases were done on 05/07/2021 – 30/08/2021. The results indicated 14 workers were still diagnosed with STS. The management have reported the cases to DOSH and the JKKP 7 forms were available for verification. Audiometry for the year 2021 was conducted on 27/11/2021, awaiting the results.</p> <p><u>FGVPM Semaring 01 Estate</u></p> <ol style="list-style-type: none"> 1. HIRARC was available in the mill to identify assess and provide controls for all the risks associated to the operations in the mill. Sighted the HIRARC for Trunk Injection, Harvesting, Internal Transport and FFB Loader. 2. CHRA Chemical Health Risk Assessment was conducted in the estate by Ihsan Sharif Resources on 20/10/2021 – 05/11/2021. The CHRA Report (JKKP HQ/08/ASS/00/85-2021-0006) was available for verification. 3. Baseline Noise Risk Assessment has been conducted at Semaring 01 Estate on 09/03/2021 by Noise Risk Assessor, Mohd Syukri bin Jamaluddin (JKKP Registration No.: HQ/14/PEB/00/136). The NRA Report (N0136/2103-021) was available for verification. <p><u>FGVAS Kerteh POM</u></p> <ol style="list-style-type: none"> 1. HIRARC was available in the mill to identify assess and provide controls for all the risks associated to the operations in the mill. Sighted the HIRARC for Harvesting, Spraying and Manuring. 	
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		<p>2. Noise Risk Identification Checklist have been conducted on 25/02/2021 in the estate. The checklist have indicated that there are no operations that are exposed excessive noise.</p> <p>3. The Chemical Health Risk Assessment was conducted to assess all risks associated to hazardous chemicals that are used in the estate operations. The assessments was conducted by Unit HSE, Kluster R&D dan Khidmat Agri, Pusat Penyelidikan Pertanian Tun Razak (HIE 127/171-2 (303)) on 11/09/2017. The CHRA Report (Report Number: HIE 127/171-2 (303) – 2017/001) was available for verification in the estate. The management have implemented all the recommendations provided by the assessor in the report.</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 the Health and Safety Plans are monitored and ensured through checklists, site inspections and trainings that were conducted by FGVPISB Kerteh POM and its supply base estates in each of the operations. Site visits around the mill and estates indicated the control measures as per HIRARC were followed and ensured by the respective management units.</p>	Complied
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>A training programme has been developed and available in the Training Requirement for Operating Units (Mills & Estate). The trainings were sighted to have included Gender Specific Training and involves staffs and workers. Covid-19 training and briefings were sighted at the mill and estates. Interview with the workers and staff indicated that they were aware on the SOP during the ongoing pandemic such as social distancing, regular sanitization and use of PPE (Face Mask).</p>	Complied

<p>3.7.2</p>	<p>Records of training are maintained. - Minor Compliance -</p>	<p>Training records are maintained by each Operating Unit. Sample some records at each Operating as follows: FGVPI SB Kerteh POM POM</p> <table border="1" data-bbox="1153 483 1926 831"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Whistleblowing Policy Training</td> <td>25/11/2021</td> </tr> <tr> <td>Zero Open Burning Training</td> <td>22/11/2021</td> </tr> <tr> <td>PPE Training</td> <td>11/11/2021</td> </tr> <tr> <td>Environmental Policy Training</td> <td>04/11/2021</td> </tr> <tr> <td>Sexual Harassment Training</td> <td>28/10/2021</td> </tr> <tr> <td>Scheduled Waste Management Training</td> <td>11/01/2021</td> </tr> </tbody> </table> <p>FGVPM Semaring 01 Estate</p> <table border="1" data-bbox="1153 922 1926 1220"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Environmental Aspect Impact Training</td> <td>10.03.2021</td> </tr> <tr> <td>Chemical Spraying Training</td> <td>21/09/2021</td> </tr> <tr> <td>Harvesting Training</td> <td>21/09/2021</td> </tr> <tr> <td>Payslip Training</td> <td>01/11/2021</td> </tr> <tr> <td>Covid-19 Training</td> <td>23/09/2021</td> </tr> </tbody> </table> <p>FGVAS Kerteh Estate</p> <table border="1" data-bbox="1153 1311 1926 1359"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> </tbody> </table>	Training	Date	Whistleblowing Policy Training	25/11/2021	Zero Open Burning Training	22/11/2021	PPE Training	11/11/2021	Environmental Policy Training	04/11/2021	Sexual Harassment Training	28/10/2021	Scheduled Waste Management Training	11/01/2021	Training	Date	Environmental Aspect Impact Training	10.03.2021	Chemical Spraying Training	21/09/2021	Harvesting Training	21/09/2021	Payslip Training	01/11/2021	Covid-19 Training	23/09/2021	Training	Date	<p>Complied</p>
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		Schedule Waste Training	23/09/2021	
		PPE Training	03/04/2021	
		FFB Harvesting and Loading Training	14/07/2021	
		Chemical Handling Training	26/03/2021	
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 -	The mill has conducted a RSPO SCCS Training for all relevant personals (Mill Manager, Asst Mill Manager, Weighbridge Clerk, Supervisor, Lab Analyst, FFB Grader and Auxiliary Police) on 01.12.2021. The training was conducted based on the RSPO SCCS requirements and procedures.		Complied
Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C) . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)				
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 process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	Kerteh POM received and processed both RSPO certified and non-certified FFB hence applied Mass Balance Module for its supply chain. Thus, this requirement is not applicable.		Not Applicable
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own	Kerteh POM received FFB from estates within its own certification unit and non-certified FFB suppliers. Kerteh POM is certified with Mass Balance Module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill,		Complied

	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.	the implementation of processing controls and volume sales of RSPO certified products.	
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.	Felda Holdings Berhad held RSPO membership number: 1- 0225-16-000-00 since 27 December 2016. Company has registered in PalmTrace system as follows: a. Members ID – FPISB KILANG SAWIT KERTEH KILANG SAWIT KERTEH: RSPO_PO1000001907. b. Member Category: Oil Mill	Complied
3.8.5	Documented procedures The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able	a) Documented procedure has been established for supply chain and has been documented in the document number FGV/GSD-SCCD/SOP/007 title "Prosedur RSPO Supply Chain certification (Kilang Sawit). As per stated in the procedure, for purchasing of FFB, FFB supplier need to provide delivery note from the estate and POM need to provide weigh bridge ticket to the supplier. Information that required in the weighbridge tickets are supply chain model, product quantity, delivery date, unique identity number, and RSPO certificate number. b) 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	Complied

	<p>to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>Internal Audit Report, Management Review Meeting Minutes, RSPO SCCS Training Records, Mass Balance Sheets, Weighbridge Tickets of Incoming and Outgoing RSPO products.</p> <p>c) Kerteh POM have appointed 11 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 01/12/2021 undersigned by the Mill Manager. Interview with the sampled personals (Weighbridge Clerk & Auxiliary Police) indicated that they understood the SCCS procedures.</p> <p>d) 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> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<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</p> <p>Internal audit has been done for RSPO Supply Chain and the report has been made available in the document title "Checklist audit pdalaman pensijilan RSPO SCC' that has been conducted by Mr Abdul Rahman Awang on 02/12/2021. There is no nonconformities has been raised during the audit.</p> <p>Not applicable since there is no nonconformities has been raised during the audit.</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. 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>There is evidence that mill has verified and documented the tonnage and sources of certified and non- certified.</p> <p>Nota Hantaran BTS (FFB Delivery Note) will be submitted to the mill during incoming of FFB from the certified supply base. Information of the Nota Hantaran BTS was recorded in the Weighbridge System.</p>	<p>Complied</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>Kerteh POM has ensured the required information is available in document form. There is no CSPO sold for year 2021. Sampled Sales Documents as below:</p> <p><u>CPO</u></p> <ul style="list-style-type: none"> a. The name and address of the buyer: Kuantan Bulking Installation, Jalan Pelabuhan 1/6, Tanjung gelang, 26080, Kuantan, Pahang b. The name and address of the seller: FGV Trading Sdn Bhd – Kilang Sawit Kerteh, 23309 Ketengah Jaya, Terengganu. c. The loading or shipment/ delivery date: 01/08/2021 d. The date on which the documents were issued: 01/08/2021 e. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): CPO – RSPO SCC (Mass Balance) f. The quantity of the products delivered: 36.97 MT g. Any related transport documentation: W/B Ticket# H00000450 h. A unique identification number: W/B Ticket# H00000450 	<p>Complied</p>

		<p><u>CSPK</u></p> <ul style="list-style-type: none"> a. The name and address of the buyer: FKP Semambu, Lot 149, Kawasan Perindustrian Semambu,25350, Kuantan, Pahang b. The name and address of the seller: FGV Trading Sdn Bhd – Kilang Sawit Kerteh, 23309 Ketengah Jaya, Terengganu. c. The loading or shipment/ delivery date: 03/08/2021 d. The date on which the documents were issued: 03/08/2021 e. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations)Palm Kernel – RSPO SCC (Mass Balance) f. The quantity of the products delivered: 42.57 MT g. Any related transport documentation: W/B Ticket# L00000112 h. A unique identification number: W/B Ticket# H00000112 	
3.8.9	<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 	<p>No outsourcing activity with regards to processing of FFB or PK. All transportation from Mill is from FELDA transport (own company).</p>	<p>Not Applicable</p>

	<p>that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	No processing of palm products involved outsourcing activities except for transporter which been included its details in the stakeholder list under vendor category.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	No new contractor used for physical handling of RSPO certified oil palm products since the last audit. Nonetheless, the mill aware of this requirement.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p>	<p>Records were maintained and updated by FGVPIB Kerteh POM and available for verification.</p> <p>a. The mill has maintained complete and updated records covering all aspects of the RSPO SCCS such as Internal Audit Reports, RSPO Supply Chain Certification Procedure (Oil Mill) and Mass Balance Sheet among others.</p> <p>b. Specified in the RSPO SCCS Procedure for Mill, SOP Number: FGV/GSD-SCCD/SOP/007; Version: 01; Document Date: 07/01/2021, under section Record keeping. In the SOP stated that the document shall be maintain a minimum of 2 years for reference and audit purposes.</p> <p>c. The mill have recorded and maintained a mass balance record for FFB (Doc Number: FPIMP756), CPO (Doc</p>	Non-compliance

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- d) 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.
- e) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.
- f) 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).

Number:FPIMP755) and PK (Doc Number: FPIMP757). The records show the Opening stock, CPO/PK Production, CPO/PK Sales, Conventional Sales and Closing Stock. The mill uses the continuous accounting system which doesn't allow the short sales of CPO and PK.

- Based on the Mass Balance accounting system and Palm Trace announcement of CPO and PK sales, it was identified that the transactions were not in accordance with the RSPO SCCS Procedure and RSPO Standard Requirements.
- The mass balance records did not tally with the palm trace announcement volume as below:
 Mass balance records: Sales of Credit: 638 mt
 Palm Trace Announcement (Credit): 658 mt
- The sales of PK were from negative stocks and were not balanced within 3 months. The mass balance records did not capture the negative sales in its data sheet.

Month	Production	Sales	Balance
		CF	26.73
Apr-21	26.40	86.42	-33.29
May-21	17.47	-	-15.82
Jun-21	20.60	124.56	-119.78
Jul-21	20.60	-	-99.18
Aug-21	13.96	-	-85.22
Sep-21	14.17	-	-71.05
Oct-21	11.55	-	-59.50
Nov-21	16.90	-	-42.60
Dec-21	19.39	37.31	-60.52

		Therefore, a Critical Non-conformity has been raised for the noncompliance.																			
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>As per OER and KER of mill productions for month of November and December 2021 the figure was as following:</p> <table border="1"> <thead> <tr> <th>Description</th> <th>November 2021</th> <th>December 2021</th> </tr> </thead> <tbody> <tr> <td>FFB Processed</td> <td>25,360 mt</td> <td>21,080 mt</td> </tr> <tr> <td>OER</td> <td>20.70 %</td> <td>19.53 %</td> </tr> <tr> <td>CPO Produced</td> <td>5248.38 mt</td> <td>4,116.00 mt</td> </tr> <tr> <td>KER</td> <td>5.18 %</td> <td>5.05</td> </tr> <tr> <td>PK Produced</td> <td>1312.87 mt</td> <td>1,065.56</td> </tr> </tbody> </table>	Description	November 2021	December 2021	FFB Processed	25,360 mt	21,080 mt	OER	20.70 %	19.53 %	CPO Produced	5248.38 mt	4,116.00 mt	KER	5.18 %	5.05	PK Produced	1312.87 mt	1,065.56	Complied
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PK Produced	1312.87 mt	1,065.56																			
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Daily OER and KER of FFB processed recorded in the daily figure report on daily basis which were based on actual measurement of production stocks.	Complied																		
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	FGVPISB Kerteh POM implemented the Mass Balance Module for its Supply Chain Certification, hence, this requirement in not applicable.	Not Applicable																		
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p>	The actor is a palm oil mill and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. Based on the downloaded transactions register from the certification unit's Palmtrace, the company was able to demonstrate that it has been registering its transactions in the Palmtrace accordingly. Based on the announcement (transaction)	Complied																		

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	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.	summary, all the registrations were found to be in order and announced within 3 months of the final shipment date.	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Not Applicable as corporate communication is managed at FGV Holdings Berhad HQ level.	Not Applicable
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	Not Applicable 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 organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	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 693209).	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.	Kerteh 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	Not Applicable as the facility does not involve with consumer end product.	Not Applicable

	products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.		
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Not Applicable 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	Not Applicable as the facility does not involve with consumer end product.	Not Applicable

	<p>ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
<p>MODULE B – MASS BALANCE SPECIFIC RULES</p>			
<p>Minimum Mass Balance content</p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>CPO and PK content is 100% Oil Palm and claimed as either RSPO MB-certified or conventional.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>CPO and PK content is 100% Oil Palm and claimed as either RSPO MB-certified or conventional. The is no percentage of non-certified volume as volume sold is same with MB-certified produced.</p>	<p>Complied</p>
<p>Labelling and trademark (MB)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. 	<p>No label been used for the mill products. Hence, this requirement is not applicable.</p>	<p>Not Applicable</p>

	<ul style="list-style-type: none"> Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
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>No evidence of storytelling in product related communication. Hence, this requirement is not applicable</p>	<p>Not Applicable</p>
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and</p>	<p>FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where the company</p>	<p>Complied</p>

	<p>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>committed to respecting human rights by upholding international human rights principles and standards as encapsulated in the Universal Declaration of Human Rights (UDHR), and other applicable international human rights treaties, subject to the laws and regulations of the countries and territories in which FGV Group operates. In fulfilling its responsibility to respect human rights, FGV Group is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs).</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>As per interview with the workers and stakeholders, there is evidence that POM and estate does not instigate violence or use any form of harassment in their operations.</p>	Complied
<p>Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>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.</p> <p>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.</p> <p>Besides, whistleblowing e-form was available in https://www.fgvholdings.com/whistleblowing/ for the stakeholders to report a grievance.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Refer to Indicator 4.2.1. The procedures were briefed to the external stakeholders and internal workers. Seen the training records. Kerteh POM has issued memo to relevant stakeholders in related to the channels of report complaint and grievances. Interviewed with the stakeholders confirmed that they are understand on the process of complaint and grievances.</p>	Complied

4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>All estates and mill within Kerteh complex has implemented Complaint/ Improvement Form and Complaint & Grievance Record. The complainant will lodge complaint and written in the complaint form and the person in charge will transfer the complaint into the Complaint & Grievance Record to monitor. Any action taken will be recorded in the form and complainant will acknowledged after the issue has resolved.</p> <p>Sighted sample complaints on housing repair made by workers recorded in Record Book of Estate Workers Complaints of Kerteh Estate which resolved within agreed timeframe with complainants.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>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>Contribution has been made by both POM and estates to the local communities and has been recorded. Sample has been taken for donation of food basket for those that has been quarantine due to COVID-19. It has been verified base on memo that has issued by Divisional Head, Plantation department. Other than that the company will gratitude for those family members that died due to COVID 19. Other than that, it was verified contribution for workforce to cleaning mosque after the flood in nearby Kampung.</p>	Complied
<p>Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the</p>	<p>Evidence of legal ownership of the land including history of land tenure was verified where both mill and estates able to demonstrate</p>	Complied

<p>history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>their rights to use land through several documents sighted as following:</p> <p><u>FGVPISB Kerteh POM</u></p> <p>The mill has its own land title for lease period until 30/7/2061 (60 years as per Surat Perjanjian Antar Lembaga Kemajuan Tanah Persekutuan (FELDA) Dan Felda Palm Industries Sdn. Bhd.; Rancangan: Felda Kerteh 2; Date: 25/11/1996. Land title # 8322; Lot # 4081; District: Dungun; Sub-district: Mukim Rasau; Area: 47,370 m2; Conditions: for POM and related buildings only.</p> <p>The premise is surrounded by Fleda’s settlers. Records of boundary stones was available. There are 10 stones all together and last monitored on 13/8/2018, where all were found still in good condition.</p> <p><u>FGVPM Semaring 1 Estate</u></p> <p>Pejabat Pengarah Tanah dan Galian Terengganu has leased 3,968.19 Acres for Semaring 1 (part of the area that was leased to FELDA [ref.: PTG. TR.00/42/1995/C/002/01-(44), dated 18/4/2011].</p> <p><u>FGVAS Kerteh Estate</u></p> <p>FELDA has leased 110.56 Ha to FASSB Kerteh (formally known as Kerteh 5) [ref.: letter of permission from FELDA to FASSB, (06) JPLDG1151/02-30, dated 18/1/2018]. The letter serves as temporary permit to FASSB while waiting for the renewed agreement to be issued since old agreement had expired on 31/12/2019 [ref.: Supplementary Agreement between FELDA and FASSB dated 29/10/2019].</p>	
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		Current Second Supplemental Agreement; Dated 2/9/2020 between FELDA and FGVASSB for period from 1/1/2020 – 31/12/2020 under application by FGVASSB for extension since November 2020 as per letter ref. # (84) 820101013/Khidmat Korporat/External; Date: 13/11/2020 has been acknowledged received by FELDA on 17/12/2020 but not replied yet.	
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 Kerteh 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.	Not Applicable
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 Kerteh 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.	Not Applicable
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 Kerteh 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.	Not Applicable
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	There is no land dispute in the Kerteh 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	Not Applicable

	status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	the stakeholders confirmed that no encroachment of land by the company.	
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There is no land dispute in the Kerteh 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.	Not Applicable
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 Kerteh 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.	Not Applicable
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 Kerteh 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.	Not Applicable
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 Kerteh 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.	Not Applicable
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			

4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -</p>	<p>There no new planting in and no acquisition of new land in all estates within Kerteh complex.</p>	<p>Not Applicable</p>
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -</p>	<p>There no new planting in and no acquisition of new land in all estates within Kerteh complex.</p>	<p>Not Applicable</p>
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -</p>	<p>There no new planting in and no acquisition of new land in all estates within Kerteh complex.</p>	<p>Not Applicable</p>
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -</p>	<p>There no new planting in and no acquisition of new land in all estates within Kerteh complex.</p>	<p>Not Applicable</p>
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic,</p>	<p>There no new planting in and no acquisition of new land in all estates within Kerteh complex.</p>	<p>Not Applicable</p>

	environmental and social implications of the proposed operations on their lands. - Minor compliance -		
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	There no new planting in and no acquisition of new land in all estates within Kerteh complex.	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	There no new planting in and no acquisition of new land in all estates within Kerteh complex.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There no new planting in and no acquisition of new land in all estates within Kerteh complex.	Not Applicable
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	FGV has developed procedure on “Pengenalpastian dan penyelesaian pertikaian tanah” with Doc. No. 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,	FGV has developed procedure on “Pengenalpastian dan penyelesaian pertikaian tanah” with Doc. No. ML-1A/L1-Pr10(0)	Complied

	monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	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.	
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 neighboring 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 neighboring 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 has developed procedure on "Pengenalpastian dan penyelesaian pertikaian tanah" with Doc. No. 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	FGV has developed procedure on "Pengenalpastian dan penyelesaian pertikaian tanah" with Doc. No. ML-1A/L1-Pr10(0) dated 01/06/2016. The objective of the procedure is to handle and	Complied

	implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	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.	
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 for both estates. Therefore, the clause is not applicable.	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 for both estates. Therefore, the clause is not applicable.	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 for both estates. Therefore, the clause is not applicable.	Not Applicable
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use	There is no customary right land for both estates. Therefore, the clause is not applicable.	Not Applicable

	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 for both estates. Therefore, the clause is not applicable.	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 previous period prices paid for FFB were displayed at the weighbridge to be viewed by all FFB suppliers. Sighted during the visit to the weighbridge information as below: Daily FFB Price 1.00% Month 01/2022	Complied						
		<table border="1"> <thead> <tr> <th>Date</th> <th>Price A</th> <th>Price B</th> </tr> </thead> <tbody> <tr> <td>02/01/2022</td> <td>Rm 58.00</td> <td>Rm 57.70</td> </tr> </tbody> </table>	Date	Price A	Price B	02/01/2022	Rm 58.00	Rm 57.70	
Date	Price A	Price B							
02/01/2022	Rm 58.00	Rm 57.70							
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 -	FGVPISB Kerteh POM conducts regular meetings with all FFB Suppliers during the JPPK Meeting with stakeholders dated 18/11/2021. The meeting discusses the Mill Performance, Grading Reports, FFB Pricing, Improvement Opportunities and Complaints & Grievances.	Complied						
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Pricing are based on MPOB FFB Pricing Mechanism and updated monthly, available on display at the weighbridge for the viewing of the FFB Suppliers. No penalties or deductions are imposed on the price, as off spec FFB Crops are rejected and the accepted FFB Crop	Complied						

		are weighed and paid in full based on the MPOB Pricing mentioned above. Interview with sampled FFB Suppliers and Smallholders indicate that they are satisfied with the FFB Pricing as it is in accordance with MPOB Pricing and no penalties or deductions are made to affect the pricing of the FFB.	
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	The FFB Suppliers are not restricted to only send the FFB to FGVPI SB Kerteh POM as they are not bound by the contract agreement to send the FFB to FGVPI SB Kerteh POM. Therefore, they are not involved in any decision-making process of the mill nor does the mill assist in the financing of the smallholders.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Contracts Agreements are made between FGVPI SB Kerteh POM and FFB Suppliers to ensure that the FFB Quality is delivered based on the MPOB Oil Palm Fruit Grading Manual, payments will be made by the 10th of the following month with advance payments available upon request, Sampled the contract agreements as below: <ul style="list-style-type: none"> • Kim Ma Oil Palm (Transport) Sdn Bhd; Doc. Number: (45) FGVPI SB/FFBPD/8668; Date: 04/03/2019 • Eng Huat Latex Concentrate Sdn Bhd; Doc. Number: (109) FGVPI SB/FFBPD/7767; Date: 04/03/2019 	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Interview with the FFB Suppliers proved that the payments were made in accordance with the contract agreement and in a timely manner. Payments were made by the 10 th of every month. A copy of the weighbridge ticket was available upon every consignment delivery together with the Rejected FFB Notification. Receipts of payments was available for the FFB Suppliers with details on total metric tonne, Rate per metric tonne and Total amount paid	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 are frequently calibrated by Avery Malaysia Sdn Bhd and Metrology Corporation Sdn Bhd to ensure the weighing mechanism is accurate and not bias.</p> <p>The records of calibration were available for verification as below: -</p> <ul style="list-style-type: none"> • Weighbridge Serial Number: B610190097 Receipt Number: 13994 Calibration Date: 23/12/2021 Safety Label Number: 2.1KQ 018399 calibrated by Avery Malaysia Sdn Bhd • Weighbridge Serial Number: B323417312 Receipt Number: D072364 Calibration Date: 08/10/2021 Safety Label Number: DE18 003945 calibrated by Metrology Corporation Sdn Bhd 	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>All the Independent Smallholders that supply FFB to FGVPISB Kerteh POM are not RSPO certified therefore this indicator is not applicable.</p>	Not Applicable
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>FGVPISB Kerteh POM conducts regular meetings with all FFB Suppliers during the JPPK Meeting with stakeholders dated 18/11/2021. The meeting discusses the Mill Performance, Grading Reports, FFB Pricing, Improvement Opportunities and Complaints & Grievances.</p>	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<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>FGVPISB Kerteh POM conducts regular meetings with all FFB Suppliers during the JPPK Meeting with stakeholders dated 18/11/2021. The meeting discusses the Mill Performance, Grading Reports, FFB Pricing, Improvement Opportunities and Complaints & Grievances.</p>	Complied

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5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	Base on the meeting as in 5.2.1, all the issues raised and required by the smallholders were discussed regularly in terms of FFB productivity, quality, finance, etc. There were no interested smallholders with RSPO certification so far.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	All suppliers have valid MPOB Licenses and MSPO Licenses as stated by Kerteh POM. Hence the legality of the FFB is justified.	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	The scheme smallholders among Felda settlers are not part of the Unit of Certification since they are managed by Felda managers and not certified with RSPO yet. Therefore, this indicator is not applicable	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	The scheme smallholders among Felda settlers are not part of the Unit of Certification since they are managed by Felda managers and not certified with RSPO yet. Therefore, this indicator is not applicable.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	As per stated in the document Group sustainability policy document number FGV/SED/POL/001 revision 4.0 effective date 17/11/2020 in clause 5.2.1, equality and non-discrimination, there is no person shall be subjected to any discrimination in employment, including, hiring, compensation, advancement, training, disciplinary action, termination or retirement on the basis of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	Complied

6.1.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Interviewed with the 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 the workers, no charging of recruitment fees for the foreign workers and offered job based on capability.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>The 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.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Reviewed the recruitment record of the medical check-up 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.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Gender committee in place established as Kelab Keluarga Dayabudi (KKD) to raise awareness, identify and address of concern, as well opportunities and improvements for woman.</p> <p>Sighted latest minutes of meeting for gender committee activities conducted by Semaring 01 Estate on 02/04/2021. No issue related to sexual harassment and violence reported. Rights of the female workers and reproductive rights were explained during the meeting.</p> <p>2 persons has been appointed panel for complaint is Puan Siti Nur Hidayah binti Mohd Nawawi and Puan Siti Nurul Hanafidah dated 21/06/2021.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Reviewed of sample payslips (March 2021, June 2021 and November 2021) in whole Kerteh certification units which consists of male and female workers found that their salary is the same for</p>	Complied

		the same job scope. They were paid according to the Minimum Wage Order 2020 without any discrimination.	
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>As per Minimum Wages Act 2020, FGVPISB Kerteh POM and FGVAS Kerteh is in the district of Dungun and the total minimum wages has been set at MYR 1200/month and RM 46.15/day. Other than that, the collective agreement between FGV Palm Industries Sdn Bhd and Kesatuan Pekerja Pekerja FGV Palm Industries Sdn Bhd (Semenanjung) dated 07/02/2020 and effective from 01/01/2019 until 31/12/2021 and has been documented in Bahasa Malaysia. In the agreement has stated condition of pay of condition that has been classified on job category and description.</p> <p>For FGVPISB Kerteh POM, 5 sample of permanent workers and 2 samples contract workers has been taken by auditor for verification.</p> <p>For FGVP M Semaring 01 Estate, 2 samples of contractors workers has been taken for FFB transporter contract under contractor name Muhammad Zuraidi bin Sulaiman and 5 permanent workers under FGVP M Semaring 01 Estate for month March, July and November 2021.</p> <p>Sample workers as per below</p> <ol style="list-style-type: none"> ID#FW06261242, Position, Harvesters ID#FW04880618, Position, Harvesters ID#FW04880621, Position, Harvesters ID#FW04880609, Position, Sprayers 	Complied

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		<p>e. ID#FW04880609, Position, Sprayers</p> <p>For FGVAS Kerteh has only 1 permanent workers and details as per below</p> <p>a. ID#PI001219003, position general workers</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Samples of workers has been selected and confirm that all workers has been provided with fair contract which has been translated into the workers origin languages. There is also evidence that the contract has been signed by parties.</p>	Complied
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>There is evidence that working hours and breaks for all workers that comply with legal regulation and collection agreement. Time recording system for estates has been established through the check roll book that has been monitored by the field supervisor. For overtime, it has been recorded in document title "Rekod kerja lebih masa" and for work on rest day and public holiday it has been recorded in the document title "Borang arahan/ kebenaran kerja lebih masa, kerja pada hari cuti rehat dan kerja pada hari cuti umum". Sample has been taken for month March , July and November 2021. There is also evidence that overtime has been paid accordingly. It has been confirmed through interview with the workers.</p> <p>Deduction for the workers is only for employee provident fund, SOCSO and khairat kemation.</p>	Complied

		All workers in the estate and POM are entitled for 15 day of public holiday and one day of rest day every week. For maternity leave, total 90 days has been allocated.	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Housing is provided to workers that is equipped with basic amenities including water supplied by local authority – SATU (Syarikat Air Terengganu) and electrical supply by TNB (Tenaga Nasional Berhad) that is charged to workers on monthly basis if it exceed the subsidy provided by the FGV Kerteh Management. Generally randomly selected houses visit sighted they are in good condition; both interior and exterior side of the houses, toilet and cooking facilities.</p> <p>Housing in Semaring 01 Estate acquired the Certificate of Fitness from JTK Terengganu as per letter of “Perakuan Kelayakan Di Bawah Peraturan 38(1)(a) Peraturan-Peraturan Standard-Standard Minimum Perumahan dan Kemudahan Pekerja 1990 – Penyempurnaan Pembinaan 2 Blok Ruma Pekerja (RPT-6 Pintu/Blok) Terengganu” ; Letter ref. # JTK(T)PLN.2019/005(05); Date: 10/3/2020; CF # PCF 1110020200001.</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>	Monitoring of food price conducted by management as per sample Semaring 01 Estate Basic Sundries Price Checklist which includes price of rice, cooking oil, eggs, sugar etc. latest surveyed on 01/06/2021 and 01/09/2021 with comparison between two sundry shops available within the complex.	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE 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</p>	<p>Based on the Decent Living Wages Plan for Kerteh Complex established by Sustainability Compliance & Certification Department (SCCD); Date: 3/1/2019, assessment conducted for current FGV workers wage paid as per following:</p> <ol style="list-style-type: none"> FGV own mechanism of calculation to determine workers wage Current SOP based on Kadar Upah Kerja (KUK) which was 	Complied

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<p>country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages 	<p>reviewed and approved by JTK Peninsular Malaysia</p> <p>c. FGV is committed to ensure all FGV workers getting decent living</p> <p>FGV proposal on DLW:</p> <p>a. FGV adopting basic calculation using DLW Guideline by RSPO (June 2019)</p> <p>b. FGV will calculate DLW base on highest (based on FGV Sites) provided by DLW Guideline by RSPO (this calculation will accommodate all 150 plantations owned by FGV)</p> <p>Basic calculation:</p> <p>{[(Food Cost +Housing Cost + Other Cost) x 5% unexpected cost] ÷ mandatory salary} + mandatory salary deduction = DLW</p>	
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	<ul style="list-style-type: none"> 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 works are performed by permanent and full-time employees in Kerteh POM and supply bases. 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 Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where FGV Group recognises and respects employees' right to freedom of association and to collective bargaining.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>FGV has signed an agreement with 'Kesatuan Pekerja-Pekerja FGV Plantations (Malaysia) Sdn Bhd Semenanjung' to outline all the terms and conditions and benefits of the employees in FGV. The agreement is valid from 01/01/2019 to 31/12/2021.</p> <p>Minutes of meetings records sighted available as per samples as following:</p> <p>Overall Employees Representatives (Peninsular Malaysia):</p> <p>a. Koperasi Pekerja-Pekerja Felda Palm Industries Berhad;</p>	Complied

		<p>Mesyuarat Agung Perwakilan Tahunan Kali Ke Tujuh Belas; 14/9/2020 (Monday); 2.30pm; Dewan Hotel Tanjung Vista Kuala Terengganu</p> <p>Peninsular Malaysia Jawatankuasa Kerja Agung:</p> <ul style="list-style-type: none"> a. Koperasi Pekerja-Pekerja Felda Palm Industries Berhad; No Pendaftaran: 505; Mesyuarat Jawatankuasa Kerja Agung Kali Pertama Sesi 2019-2022; 14/9/2020 (Monday); 8.30am; Hotel Tanjung Vista Kuala Terengganu b. Minutes of meeting available for FGV estates employee union [Kesatuan Pekerja-Pekerja Felda Global Ventures (Malaysia) Sdn. Bhd.] as per records of "Minit Mesyuarat Jawatankuasa Kerja Bil. 73"; Date: 23/5/2019; Venue: Sani Hotel Kuala Lumpur. 	
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>The 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.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Formal policy for the protection of children has been established in the document title "Group sustainability policy" policy number FGV/SED/POL/001 revision 4.0 effective date 17/11/2020 clause 5.2.2.4 mentioned that FGV is committed to employing only persons of the age of 18 and above, FGV recognize that Malaysian laws allow for young persons to be engaged in certain forms of employment. No persons shall be employed under the age of 15 and any employment of young persons shall not be in a manner that is likely to be hazardous or to interfere with such person`s</p>	Complied

		education or to be harmful to the person`s health or physical, mental, spiritual, moral, or social development at any stages of employment.	
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	As per the company policy (refer to SCOC), 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 and declaration of age is required during the application. Reviewed the master list of employees found that no child labour was employed.	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	Review from the master list of workers for both estate and POM and interview with the workers, it was confirmed that there is no young workers has been recruited.	Complied
6.4.4	<p>The unit of certification demonstrates communication about its `no child labour` policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	Communication on the policy has been done by the management of both estates on 15/09/2021 and 11/07/2021 with attendance staff and workers.	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 revision 4.0 where the company does not tolerate any form of sexual harassment violence and abuse as per mentioned in the clause 5.2.5.1	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 revision 4.0 as per stated in clause 5.2.1.1 and mentioned that no person shall be subjected to any discrimination in employment including hiring, compensation,	Complied

		advancement, training, disciplinary action including reproductive rights.	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -	For FGVPISB Kerteh POM, there is no new mother has been identified base on the list workers and interview. There are only 2 women workers and both are non-mothers.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	<p>FGV has established 'Prosedur Menangani Aduan Melalui Jawatankuasa Wanita' with Doc. No.: ML-1A/L2-PR10(1) dated Jan 2020. The objective of the procedure is to establish a mechanism to handle any issues related to gender for all the employees and housewives living in the compound. Channel of complaint lodge has outlined in the procedure such as verbal and written. The appointed committee need to forward the complaint to Regional Gender Committee within 1 week from the date of complain received. If the case is unresolved, the committee will forward the case to Talian Nur (Kementerian Pembangunan Wanita, Keluarga & Masyarakat) through 15999/ SUHAKAM/ Jabatan Tenaga Kerja Semenanjung Malaysia. The management will protect the identity of the complainant if they wish not to reveal.</p> <p>There is evidence that gender committee meeting has been conducted for FGVPISB Kerteh POM and has been verified base on the minute meeting title "Minit Mesyuarat Jawatan kuasa gender (Gender committee)/ KKD Kompleks Kerteh. That has been done 10/12/2020.</p> <p>Sighted latest minutes of meeting for gender committee activities conducted by Semaring 01 Estate on 02/04/2021. No issue related</p>	Complied

		to sexual harassment and violence reported. Rights of the female workers and reproductive rights were explained during the meeting. 2 persons has been appointed panel for complaint is Puan Siti Nur Hidayah binti Mohd Nawawi and Puan Siti Nurul Hanafidah dated 21/06/2021	
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees. Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty for termination of employment Debt bondage Withholding of wages <p>- Critical (Major) compliance -</p>	Interviewed with the workers confirmed that no forced and trafficked labour in Kerteh Certification Units. The terms and conditions offered by the company were similar in their home country and when arrived in the plantations. No contract substitution has occurred. They have kept their passport at the locker outside the office. Overtimes was monitored by the company and the workers are giving freedom to choose to overtime and resign. There was no penalty for termination of employment if they wish to terminate the contract earlier as per the employment contract signed.	Complied
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	FGV Group has developed Guidelines and Procedures for Responsible Recruitment of Foreign Workers dated 27/6/2019. The guidelines are adopted the principles embedded in the Group Sustainability Policy including non-discrimination, respect for human rights and labour rights as well as health and safety. Workers will be signed on the contract of employment and that is non-transferable to other workers and cannot be substituted. The appointed recruitment agent in the source country shall bear all the costs during recruitment process. Workers will undergo orientation	Complied

		<p>program and briefed on their rights, terms and conditions in the contract of employment and relevant labour and immigration laws. All necessities and accommodation will be provided to the workers in accordance with the legal requirements and standards to ensure decent living conditions for workers.</p>	
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<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. - Critical (Major) compliance -</p>	<p><u>FGVPISB Kerteh POM</u></p> <ol style="list-style-type: none"> 1. The Mill Manager, Hashim bin Saudi was appointed as the Chairman for Safety and Health Committee at the mill as stated in the appointment letter dated 01/01/2021 undersigned by the Regional Controller – Region 1. 2. Safety & Health meetings were conducted at an interval of 3 months at the mill to address all the OSH related issues. Sighted the meeting minutes dated 23/12/2021 (04/2021), 25/09/2021 (03/2021), 30/06/2021 (02/2021) and 20/03/2021 (01/2021). <p><u>FGVPM Semaring 01 Estate</u></p> <ol style="list-style-type: none"> 1. The Estate Manager, Mr. Muhammad Hanis Bin Abd Razak was appointed as the Chairman for Safety and Health Committee at the estate as stated in the appointment letter dated 19/02/2021 undersigned by the Regional Controller. 2. Safety & Health meetings were conducted at an interval of 3 months at the mill to address all the OSH related issues. Sighted the meeting minutes dated 08/12/2021 (04/2021), 08/07/2021 (03/2021), 06/04/2021 (02/2021) and 12/01/2021 (01/2021). <p><u>FGVAS Kerteh Estate</u></p>	<p>Complied</p>

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		<ol style="list-style-type: none"> 1. The Estate Manager, Mr. Asmadi Mohd Ali has been appointed as the OSH chairman for the estate as stated in the appointment letter dated 02/05/2021 undersigned by the R&D Division head. 2. Safety & Health meetings were conducted at an interval of 3 months at the mill to address all the OSH related issues. Sighted the meeting minutes dated 19/12/2021 (04/2021), 26/09/2021 (03/2021), 04/07/2021 (02/2021) and 23/03/2021 (01/2021). 	
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>Emergency Procedures and Safe Working Procedures were available at the office, workshops and chemical stores. Emergency Plans were available for identified incidences such as Fire, Accident, Chemical Spillage and Evacuation. Emergency Response Team was formed in the estate to counter any unwanted emergencies.</p> <ul style="list-style-type: none"> - ERP and Fire Extinguisher Training was conducted on 04/05/2021 at FGVPIB Kerteh POM - Fire Drill was conducted at FGVPIB Kerteh POM on 28/12/2021. <p>First Aid Kits were available at all sampled work units Spraying Gang, Harvesting Gang, Workshop, Boiler Station and Chemical Store. The first aid kits were well equipped with first aid items as stated in the list. All items were seen to be replenished at monitored regularly as per the monitoring checklist. The First Aid Kit holders were aware on how to use the items in case of an emergency.</p> <ul style="list-style-type: none"> - First Aider Refresher held at Alaf – Akademi Latihan FGV, Kuantan on 21/12/2021 attended by personals from FGVPIB Kerteh POM. - Basic Occupational First Aid, CPR & AED Training was attended by the staff from FGVAS Kerteh estate on 10 – 11/11/2021. 	Complied

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		<p>Accident records were maintained and updated on a monthly basis at the mill and estates.</p> <ol style="list-style-type: none"> 1. <u>FGVPISB Kerteh POM</u> There was 1 accident reported for the year 2020 in the mill involving 95 days LTA. The JKPP 6 form and accident investigations were available for verification. The JKPP 8 form for the year 2020 have been submitted to DOSH on 29/01/2021 and available for verification. There were no accidents reported in the mill for the year 2021. 2. <u>FGVPM Semaring 01 Estate</u> There was 1 accident reported for the year 2020 in the estate involving 5 days LTA. The JKPP 6 form and accident investigations were available for verification. The JKPP 8 form for the year 2020 have been submitted to DOSH on 12/01/2021 and available for verification. There were no accidents reported in the estate for the year 2021. 3. <u>FGVAS Kerteh Estate</u> There were no accidents reported for the year 2020 in the estate. The JKPP 8 form have been submitted to DOSH on 08/01/2021 and available for verification. As for 2021 there was 1 accident case involving 2 LTA days in the estate. Records of accident investigation were maintained and available for verification. 	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for</p>	<p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required PPEs were worn by the personals.</p>	Complied

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	<p>those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p>																															
<p>6.7.4</p>	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees by the organization. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for September to December 2021 for the mill and all sampled estate as below.</p> <table border="1" data-bbox="1137 695 1930 1174"> <thead> <tr> <th>Operating Unit</th> <th>Month</th> <th>Total Workers</th> <th>Amount (RM)</th> </tr> </thead> <tbody> <tr> <td rowspan="4">FGVPISB Kerteh POM</td> <td>Sep 2021</td> <td>98</td> <td>6408.50</td> </tr> <tr> <td>Oct 2021</td> <td>98</td> <td>6947.80</td> </tr> <tr> <td>Nov 2021</td> <td>96</td> <td>6893.90</td> </tr> <tr> <td>Dec 2021</td> <td>97</td> <td>6791.60</td> </tr> <tr> <td rowspan="4">FGVPM Semaring 01 Estate</td> <td>Sep 2021</td> <td>78</td> <td>2,360.90</td> </tr> <tr> <td>Oct 2021</td> <td>77</td> <td>2,427.90</td> </tr> <tr> <td>Nov 2021</td> <td>77</td> <td>1,779.20</td> </tr> <tr> <td>Dec 2021</td> <td>77</td> <td>2,178.60</td> </tr> </tbody> </table>	Operating Unit	Month	Total Workers	Amount (RM)	FGVPISB Kerteh POM	Sep 2021	98	6408.50	Oct 2021	98	6947.80	Nov 2021	96	6893.90	Dec 2021	97	6791.60	FGVPM Semaring 01 Estate	Sep 2021	78	2,360.90	Oct 2021	77	2,427.90	Nov 2021	77	1,779.20	Dec 2021	77	2,178.60	<p>Complied</p>
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	Dec 2021	77	2,178.60																														
<p>6.7.5</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Occupational Injuries were recorded using the Lost Time Accident metrics as below:</p> <table border="1" data-bbox="1137 1275 1930 1339"> <thead> <tr> <th>Operating Unit</th> <th>2020</th> <th>2021</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Operating Unit	2020	2021				<p>Complied</p>																								
Operating Unit	2020	2021																															

		Cases	Days	Cases	Days
	FGVPISB Kerteh Palm Oil Mill	1	95	nil	nil
	FGVPM Semaring 01 Estate	1	5	nil	nil
	FGVAS Kerteh Estate	nil	nil	1	2

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

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

7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -</p>	<p>IPM Plan has been established in the certification unit estates which includes the planting of beneficial plants and control of damage by rodents and leaf eating pest</p> <p>Beneficial plants such as Turnera subulata and Cassia cobanensis are grown in the estates and their records of planting in new areas and maintenance of existing areas of beneficial plants and location maps are available. Rat damage and leaf-eating pest census was regularly carried out to obtain information about threshold level and action to be taken thereafter. The records of census and rat baiting (averaging fruitlet damage <2%) were available for verification.</p> <p>Barn owl census conducted showed that it is inhabited. Additional owl boxes had been added, ratio ranging from 1:21 ha to 1:37 ha from one estate to another. Occupancy rate ranges from 59% - 70% among the estates visited. Inspection at one random barn owl box showed that it is inhabited with bones and bird droppings sighted on the ground at the foot of the barn owl box pole.</p>	Complied
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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 -	Species referenced in the Global Invasive Species Database and CABI.org are not used in the estates.	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 -	There was no evidence of use of fire for pest control in all the estates.	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 -	Justification for all pesticide available under Manual Lestari 1A, under Document: ML- 1A/L3-GP1(0) dated March 2012. In this, justification all chemical such as Pesticide, Herbicide and Fungicides are available for each chemical.	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 Pesticide/Agrochemicals used in the estate were recorded and monitored on a monthly basis and available for verification. Data for a.i/ha were sampled as below: <table border="1" data-bbox="1137 991 1933 1385"> <thead> <tr> <th data-bbox="1144 995 1335 1054">Estate</th> <th data-bbox="1339 995 1727 1054">Chemical Name</th> <th data-bbox="1731 995 1926 1054">2021</th> </tr> </thead> <tbody> <tr> <td data-bbox="1144 1061 1335 1190" rowspan="5">FGVPM Semaring 01 Estate</td> <td data-bbox="1339 1061 1727 1120">Glyphosate Pottassium</td> <td data-bbox="1731 1061 1926 1120">0.1191</td> </tr> <tr> <td data-bbox="1339 1126 1727 1185">Chlorophacinone</td> <td data-bbox="1731 1126 1926 1185">0.0001</td> </tr> <tr> <td data-bbox="1339 1192 1727 1251">Metsulfuron Methyl</td> <td data-bbox="1731 1192 1926 1251">0.0253</td> </tr> <tr> <td data-bbox="1339 1257 1727 1316">Triclopyr Butoxenthyll</td> <td data-bbox="1731 1257 1926 1316">1.1936</td> </tr> <tr> <td data-bbox="1339 1323 1727 1382">Glyphosate isoprpylamine</td> <td data-bbox="1731 1323 1926 1382">1.5797</td> </tr> </tbody> </table>	Estate	Chemical Name	2021	FGVPM Semaring 01 Estate	Glyphosate Pottassium	0.1191	Chlorophacinone	0.0001	Metsulfuron Methyl	0.0253	Triclopyr Butoxenthyll	1.1936	Glyphosate isoprpylamine	1.5797	Complied
Estate	Chemical Name	2021															
FGVPM Semaring 01 Estate	Glyphosate Pottassium	0.1191															
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		FGVAS Kerteh Estate	Metsulfuron Methyl		
			Glyphosate isoprpylamine	1.5950	
			Triclopyr Butox ethyl ester	0.1086	
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p> <p>Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead.</p>			Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There is no prophylactic use of pesticides in all estates visited.</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> <ol style="list-style-type: none"> Judgment of the threat and verify why this is a major threat Why there is no other alternative which can be used Which process was applied to verify why there is no other less hazardous alternative 	<p>The Chemical Registers for the mill and sampled estates were available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations.</p> <p>The register showed that only class III & IV pesticides were used at the mill and estates. Paraquat and Monocrotophos was eliminated. In its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.</p>			Complied

	<p>d) What is the process to limit the negative impacts of the application</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>		
7.2.6	<p>(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>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers in the estates.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p> <ol style="list-style-type: none"> 1. Spraying Training conducted at FGVP M Semaring 01 Estate for chemical handlers on 21/09/2021. 2. Chemical Handling Training was conducted for all chemical handlers on 26/03/2021 at FGVAS Kerteh Estate. 	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p>	Complied

7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through waste contractors.</p> <p><u>FGVPM Semaring 01 Estate</u></p> <p>The estate have disposed 60kg of chemical containers to Awie Metal Sdn Bhd on 06/12/2020 (Invoice Number: SLV048820120011).</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>No aerial spraying for pesticide were done in all 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.</p> <p>- Critical (Major) compliance -</p>	<p>The CHRA of each operating units have recommended the necessity of annual medical surveillance for pesticide applicators exposed to pesticides that are classified as organophosphates. There were no use of organophosphate chemicals in all the estates audited. This was verified via the Chemical Register, visit to the Chemical Store of each operating units as well as interview with the respective estate’s pesticide applicators. Nevertheless, the estates conduct monthly health screening at the estate clinics by their own Medical Assistant and records were available for verification. Health surveillance are also done for the workers to identify general health conditions regularly. Records were available and verified as below:</p> <p><u>FGVPM Semaring 01 Estate</u></p> <ul style="list-style-type: none"> - A total 23 workers were identified to be exposed to hazardous chemicals in the estate and sent for medical surveillance on 08/11/2021 – 13/12/2021 at Klinik Syed Badaruddin. The results have not been produced by the clinic yet as of to date. Earlier Medical Surveillance conducted in December 2020 for 23 	Complied

		<p>workers indicated that there were no health concerns related to pesticides usage.</p> <p><u>FGVAS Kerteh Estate</u></p> <ul style="list-style-type: none"> - Medical Surveillance 2020 was conducted for workers exposed to hazardous chemicals in the estate. The medical surveillance was conducted on 17/11/2020 for 4 workers at Klinik Sulaiman. The results indicated that all workers were fit to work. Medical Surveillance for 2021 was conducted for 2 workers at Klinik Syed Badaruddin on 30/12/2021. The results have not been provided as of yet. 	
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticide handlers and sprayers in the estates were noted to be men only. It was verified from records, field inspections and interviews that no pregnant or breast-feeding woman had been offered work as pesticide operator.</p>	Complied
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Sighted Procedure on managing schedule waste has been established. Refer "Pengurusan Bahan Buangan Terjadual Setiap Ladang" Reference number: FGVPM/L2/PAS-04 dated 23/01/2020.</p> <p>The mill has identified all waste products and source of pollutions and documented in Identification of Source and Type of Waste. The waste identified as follows:</p> <ul style="list-style-type: none"> • Scheduled Waste - Mill Operation – Used PPE, Used lubricant and hydraulic oil - Office and housing – Lamp, Electronic device • Non-schedule waste - mill operation – used tyre, scrap iron - office and housing – Paper, Plastic, domestic waste • Mill by-product - EFB, POME, Shell, Mesocarp fibre 	Complied

		<p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2021 renewed in Jan 2021.</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. - Minor compliance -</p>	<p>FGV Kerteh POM and both the estates in the CU, had established SOP for chemical handling. The SOP of handling of chemicals/waste is available in the following document</p> <ul style="list-style-type: none"> • Manual Ladang Sawit Lestari - Prosedure Kerja Selamat • Manual Sustainability - Prosedur Kerja Selamat - Prosedur membancuh Racun di PREMIX - Pengendalian Bahan Kimia <p>The Waste Management Plan 2021 has been established prepared by SCCD and verified by the Assistant Engineer/Assistants/Manager. Interview with staffs and workers i.e. storekeepers and chemical mixer were trained, and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.</p> <p>Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal.</p> <p>Sighted Record of Inventory of Schedule Waste and Disposal Record: <u>FGVPISB Kerteh POM</u> <u>Inventory</u></p> <ul style="list-style-type: none"> • File reference Number: (B)T:31/152/000/005 • Date Reporting: 01/01/2022 	<p>Non-compliance</p>

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		<ul style="list-style-type: none"> Waste Generated: SW1102=0.0190MT, SW305=0.056MT, SW409=0.009MT, SW410=0.0330MT. <p><u>Disposal sample 1</u></p> <ul style="list-style-type: none"> Disposal consignment note: 2021090618B13LOK Date Disposal: 06/09/2021 SW305=0.2580MT (Spent Lubricating Oil) by Pentas Flora (Kelantan) Sdn Bhd <p><u>Disposal sample 2</u></p> <ul style="list-style-type: none"> Disposal consignment note: 202109061849INRK Date Disposal: 06/09/2021 SW322=0.0360MT Waste on non-halogenated organic solvents) by Pentas Flora (Kelantan) Sdn Bhd <p>FGVPM Semaring 01 Estate – Send to collection centre</p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> File reference Number: FGVPM/L2/PAS-04 Date Reporting: 02/03/2021 Waste Generated: SW1102=0.0190MT, SW305=0.056MT, SW409=0.009MT, SW410=0.0330MT. <p><u>Disposal sample 1</u></p> <ul style="list-style-type: none"> Disposal consignment note: 2021090618B13LOK Date Disposal: 06/09/2021 SW305=0.2580MT (Spent Lubricating Oil) by Pentas Flora (Kelantan) Sdn Bhd 	
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		<p>During document verification at FGVPM Semaring 01 Estate, there were no evidence of SW Inventory maintained in the estate for SW409 for the consignment disposed on 27/10/2021 (0.019kg).</p> <p>During document verification for FGVAS Kerteh it was found that no inventory of schedule waste has been maintained.</p> <p>It was against SOP "Pengurusan Bahan Buangan Terjadual Setiap Ladang" dated 23/01/2020 Ref. FGVPM/L2/PAS-04 section 6.5.1 "Kerani Bekalan mestilah mengemaskini rekod inventori bagi bahan buangan terjadual setiap Bulan".</p> <p>Therefore, a Minor Non-conformity has been raised for the noncompliance.</p>				
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>FGV practices of "Zero open burning" is enforced and elaborated in the Group Sustainability Policy dated 29 May 2019. The compliance are also included in the following guidelines;</p> <ul style="list-style-type: none"> • Manual Ladang Sawit Lestari - Prosedure Kerja Selamat • Manual Sustainability - Prosedur Kerja Selamat - Penyediaan tanah tanam semula <p>The operating units adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. Both the Estates had no replanting program.</p> <p>No fire was used for waste disposal. Domestic waste at Linesite of FGVPIB Kerteh POM was handle by contractors Koperasi Pekerja-Pekerja Felda Palm and send to the <i>Majlis Perbandaran Dungun</i> Centre Bin.</p> <table border="1" data-bbox="1137 1294 1924 1353"> <tr> <td data-bbox="1137 1294 1424 1353">Estate</td> <td data-bbox="1424 1294 1662 1353">Block No</td> <td data-bbox="1662 1294 1924 1353">Date Open/Closed</td> </tr> </table>	Estate	Block No	Date Open/Closed	Complied
Estate	Block No	Date Open/Closed				

		FGVPM Semaring 01	PM11C	28/12/2021	
		FGVAS Kerteh	Peringkat 1 D5	09/12/2021	
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.					
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>The Mill and estates continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOP.</p> <p>a. FGV Agriculture Manual 1998 - Revised in 01/09/2017 - Manual Ladang Sawit Lestari - Prosedur Kerja Selamat - Manual Sustainability 2016 - Prosedur Kerja Selamat - Prosedur membancuh Racun di PREMIX - Pengendalian Bahan Kimia</p> <p>b. Pictorial Safety Standards and Security Guidelines (PSS).</p> <p>c. Laboratory Process Control Manual</p> <p>FGVPISB Kerteh POM processing system is documented in the following documents.</p> <p>a. Manual Operasi Kilang Sawit introduced on 02/01/2001 revised 23/10/2017</p> <p>b. Prosedur Kerja Selamat</p> <p>c. Manual Alam Sekitar EMS</p> <p>d. Laboratory Process Control Manual</p> <p>These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from the reception, sterilisation, threshing, pressing,</p>			Complied

		<p>clarification, depericarping (nut polishing) station, effluent, laboratory, workshop, despatches etc.</p> <p>The procedures as documented in the FGV Agriculture Manual were disseminated to the staff/workers through morning briefings and training.</p> <p>The Manuals are kept in the main office for references of employees particularly for the supervisory personnel.</p> <p>The documents included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security.</p> <p>Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.</p>	
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>The Internal Agronomist from FGV Agriculture Services Sdn Bhd visited the estates to perform foliar sampling prior to the fertilizer recommendation for the forthcoming year.</p> <p>Leaf and soil nutrient analysis are a common methodology used in the diagnosis of fertilizer requirements in oil palms.</p> <p>Foliar analysis reports were then issued to the estates for the program establishment and application. This includes the order of fertilizer and workforce/machine planning.</p> <p>For the estate Agronomic assessment and fertilizer recommendation was conducted to formulate the FY2021 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been were carried out in all estates. The latest being:</p> <p><u>FGVPM Semaring 01 Estate</u></p> <ul style="list-style-type: none"> • Report Date: 15/07/2020 	Complied

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		<ul style="list-style-type: none"> • Report Number: FRF20210345 <p><u>FGVAS Kerteh Estate</u></p> <ul style="list-style-type: none"> • Report Date: 11/11/2021 • Report Number: FRF20210345 <p>Soil sampling was carried out accordingly and analysis is made yearly on different fields. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. Soil analysis for PH, Org C, Total N, Total P, Avail P, Exchange K, Exchange Ca & Exchange Mg was carried out on a year cycle basis on different blocks with the recent carried out as follows:</p> <p><u>FGVPM Semaring 01 Estate</u></p> <ul style="list-style-type: none"> • Report Date: 15/07/2020 • Report Number: FRS20210338 <p><u>FGVAS Kerteh Estate</u></p> <ul style="list-style-type: none"> • Report Date: 11/11/2021 • Report Number: FRF20210345 <p>All foliar and soil sampling & analysis was conducted by FGV PPTR Laboratory.</p>	
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>The following practices are applied in the estates in relation to the nutrient recycling strategy: -</p> <ul style="list-style-type: none"> • EFB application is minimal as the mill has facility of incinerator • Cut frond are stacked in between the palms rows left to discompose. 	Complied
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizer application program was monitored using records i.e. program sheets, bin cards, field cost book, fertilizer application monitoring forms, etc.</p>	Complied

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		<p>Records of programs and applications of fertilizers were reviewed by the auditors. Review of the records revealed that the actual fertilizers applied in 2020/2021 was in line with the program.</p> <p>The following fertilizers were applied in the estates on recommendation by the Agronomist: -</p> <p>FGVPM Semaring 01 Estate</p> <table border="1" data-bbox="1137 579 1928 810"> <thead> <tr> <th>Fertilizer</th> <th>Field/Block</th> <th>Dosage, Kg</th> <th>Month Programme</th> <th>Month Applied</th> </tr> </thead> <tbody> <tr> <td>NPK Mix</td> <td>PM11C</td> <td>6.00</td> <td>Feb</td> <td>Feb</td> </tr> <tr> <td>PMG</td> <td>P12D</td> <td>2.50</td> <td>Apr</td> <td>Apr</td> </tr> <tr> <td>NK Mix</td> <td>P13E</td> <td>2.00</td> <td>Aug</td> <td>Aug</td> </tr> </tbody> </table> <p>FGVAS Kerteh Estate</p> <table border="1" data-bbox="1137 860 1928 1042"> <thead> <tr> <th>Fertilizer</th> <th>Field/Block</th> <th>Dosage, Kg</th> <th>Month Programme</th> <th>Month Applied</th> </tr> </thead> <tbody> <tr> <td>NPK Mix</td> <td>Peringkat 1</td> <td>2.50</td> <td>May</td> <td>May</td> </tr> <tr> <td>FOF</td> <td>Peringkat 2</td> <td>2.50</td> <td>Aug</td> <td>Aug</td> </tr> </tbody> </table> <p>The management of soil fertility is guided by FGV's "Manual Ladang Sawit Lestari" (Oil Palm Plantation Sustainability Manual), Third Edition (2017), Section MLSL Section 5.0: Manuring.</p>	Fertilizer	Field/Block	Dosage, Kg	Month Programme	Month Applied	NPK Mix	PM11C	6.00	Feb	Feb	PMG	P12D	2.50	Apr	Apr	NK Mix	P13E	2.00	Aug	Aug	Fertilizer	Field/Block	Dosage, Kg	Month Programme	Month Applied	NPK Mix	Peringkat 1	2.50	May	May	FOF	Peringkat 2	2.50	Aug	Aug	
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Criterion 7.5: Practices minimise and control erosion and degradation of soils.																																						
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was available. There were no problematic soils (e.g. podzols and acid sulphate soils) in the estates. The soil map is prepared by Unit</p>	Complied																																			

		<p>Komputer (GPS/GIS) from FGV Agricultural Services Sdn Bhd. Among sample of soil series were captured in estate record were: _ <u>FGVPM Semaring 01 Estate</u></p> <table border="1" data-bbox="1137 475 1921 722"> <thead> <tr> <th>Soil series</th> <th>Percentage, %</th> </tr> </thead> <tbody> <tr> <td>Baserah (BSH)</td> <td>1.53</td> </tr> <tr> <td>Renggam (RGM)</td> <td>4.70</td> </tr> <tr> <td>Bungor (BGR)</td> <td>41.00</td> </tr> <tr> <td>Kuala Brang (KBG)</td> <td>54.00</td> </tr> </tbody> </table> <p><u>FGVAS Kerteh Estate</u></p> <table border="1" data-bbox="1137 775 1921 914"> <thead> <tr> <th>Soil series</th> <th>Percentage, %</th> </tr> </thead> <tbody> <tr> <td>Bungor (BGR)</td> <td>78.18</td> </tr> <tr> <td>Bungor (BGR), Medang (MDG)</td> <td>33.77</td> </tr> </tbody> </table>	Soil series	Percentage, %	Baserah (BSH)	1.53	Renggam (RGM)	4.70	Bungor (BGR)	41.00	Kuala Brang (KBG)	54.00	Soil series	Percentage, %	Bungor (BGR)	78.18	Bungor (BGR), Medang (MDG)	33.77	
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7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Estates visited continued to have a management strategy for planting on slopes to minimize and control erosion and degradation of soils. The plantings on slopes was guided in the Sustainability Policy under item "Perlindungan Dan Penjagaan Alam Sekitar" signed by Group CEO dated 05/05/2019. The content of the Policy among others includes the following: -</p> <ul style="list-style-type: none"> a) Compliance with all related guidelines and regulatory laws. b) Implementation of GAP as stated in FELDA Lestari. c) Implement suitable remedial to reduce impact to the environment. <p>Other guidelines were also shown in the following documents among others;</p>	Complied																

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		<p>a) Slope & River Protection Policy in Section 1A/L3 FGV Sustainability Manual</p> <p>b) Buffer Zone & 25-degree slope in Section 1A/L3 FGV Sustainability Manual</p> <p>c) Land Preparation for Terracing in Section 1A/L2 FGV Sustainability Manual.</p> <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in the interlines. Cover crops were planted in the replants and in certain mature areas. The cover crop <i>Mucuna Bracteata</i> had been planted along crucial slopes by management. Large areas with <i>Neprolepis Biserrata</i> in the inter rows were sighted during the visit.</p>	
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>Verified that there is no new planting at estates visited. Management has established procedure related to oil palm planting on steep terrain. List of procedure as below; -</p> <p>a) Slope & River Protection Policy in Section 1A/L3 FGV Sustainability Manual</p> <p>b) Buffer Zone & 25-degree slope in Section 1A/L3 FGV Sustainability Manual</p> <p>c) Land Preparation for Terracing in Section 1A/L2 FGV Sustainability Manual.</p>	Complied
<p>Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>			
7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p>	<p>Soil surveys are made and available in a soil map for both the visited estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estate. The</p>	Complied

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	- Critical (Major) compliance -	estate had no new planting for the current year and for the forthcoming 5 years operations.	
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 -	FGV Group Estates had no planting on areas of more than 25 degree. Plantings on steep slope are avoided.	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 are made and available in a soil map at both the estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estate. Details as per 7.5.1 and 7.5.2.	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 -	There are no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in both 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 -	There are no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in both the estates.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	There are no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in both the estates.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	The water and ground cover management programme is documented in the FGV Agricultural Manual (Water Management in Inland, Costal and Peat lands) issued on 01/07/2011. Individual	Complied

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

7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There are no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in both the estates.</p>	Not Applicable
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>The mill water management plan has been established with the recent review made on respectively by the OU. Among others the plan therein has emphasized: -</p> <p>a) Rain water harvesting for cleaning purposes,</p> <p>b) Water from the reservoir/catchment for the mill operations</p> <p>c) Continual training for workers on water efficiency consumption, desilting of water reservoir to retain the reservoir optimal capacity.</p> <p>d) The action plan in event of draught/water pollution</p> <p>Variations and action plan were discussed during the Environment Meeting 2021. Prevention is made especially during the manuring activities. FGV reviewed the environmental performances during the EPMC Environmental Performance Monitoring Committee dated 23/11/2021.</p> <p>Water sampling has been conducted for monitoring final discharge, treated water quality and natural waterways in the estate and mill:</p> <p><u>FGVPISB Kerteh POM</u></p> <p>Sample Cert: 4907/2021</p> <p>Date of sample: 15/12/2021</p>	Complied

		<p>Lab reference Number: 10834/2021</p> <table border="1"> <thead> <tr> <th>Indicator</th> <th>Inlet</th> <th>Outlet</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>7.22</td> <td>7.41</td> </tr> <tr> <td>BOD</td> <td>26</td> <td>39</td> </tr> <tr> <td>COD</td> <td>162</td> <td>352</td> </tr> <tr> <td>Total Solid</td> <td>-</td> <td>-</td> </tr> <tr> <td>Suspended Solid</td> <td>56</td> <td>165</td> </tr> <tr> <td>Oil & Grease</td> <td>2</td> <td>4</td> </tr> <tr> <td>Ammonium Nitrogen</td> <td>1</td> <td>4</td> </tr> </tbody> </table>	Indicator	Inlet	Outlet	pH	7.22	7.41	BOD	26	39	COD	162	352	Total Solid	-	-	Suspended Solid	56	165	Oil & Grease	2	4	Ammonium Nitrogen	1	4	
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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>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at the estate and mill catchment. Riparian buffer zones have been identified and demarcated. No chemicals and fertilizer application observed been used in their maintenance. In certain areas Guatemala grass / Vertivar sp were planted along the river banks. Guidelines of the width of the rivers and natural courses to be protected have been illustrated in the FGV Sustainability Manual. Section 1A/L2 revised dated 01/06/2016. The buffer zones established are as follows:</p> <table border="1"> <thead> <tr> <th>River width (meter)</th> <th>Minimum width for river reserve (m) for peninsular Malaysia and Sarawak</th> </tr> </thead> <tbody> <tr> <td>1-5</td> <td>5</td> </tr> <tr> <td>5-10</td> <td>10</td> </tr> <tr> <td>10-20</td> <td>20</td> </tr> </tbody> </table>	River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak	1-5	5	5-10	10	10-20	20	Complied																
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		<table border="1"> <tr> <td>20-40</td> <td>40</td> </tr> <tr> <td>>40</td> <td>50</td> </tr> </table> <p>Buffer zones were protected. Areas visited for the estates as tabled below: - FGVP Semaring 01 Estate</p> <table border="1"> <thead> <tr> <th>Details</th> <th>Field</th> </tr> </thead> <tbody> <tr> <td>Hutan Simpan Chemerong</td> <td>PM13</td> </tr> <tr> <td>Sungai Balau</td> <td>PM 13</td> </tr> <tr> <td>Sungai Semaring</td> <td>PM11</td> </tr> </tbody> </table>	20-40	40	>40	50	Details	Field	Hutan Simpan Chemerong	PM13	Sungai Balau	PM 13	Sungai Semaring	PM11	
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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 effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements.</p> <ul style="list-style-type: none"> No over-flow was observed, and flow meter reading was recorded daily. The mill monitoring the effluent and submits to DOE through 'Borang Penyata Suku Tahunan'. Kerteh Mill DOE license was for water discharge requirement of which is BOD less than 100mg/l. c <p>The results from final discharge were compliance within the parameter limit.</p> <p>Monthly analysis was done for final discharge point. Total of 8 parameters (pH, BOD3, COD, TS, SS, TN, AN and O&G) were tested. Latest analysis report for September, August, July 2021 were verified.</p> <table border="1"> <thead> <tr> <th>Report Date</th> <th>Report No.</th> <th>BOD</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Report Date	Report No.	BOD				Complied						
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				(Limit=100mg/L)																																																	
		08/09/2021	3347/2021	67.00																																																	
		03/08/2021	2868/2021	100.00																																																	
		14/07/2021	2600/2021	59.00																																																	
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Mill has maintained monitoring of water usage for processing FFB which are recorded monthly. Water for processing is abstracted from water catchment by using pump. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record FGVPISB Kerteh POM. Average data as below:</p> <table border="1"> <thead> <tr> <th>Month/Year</th> <th>FFB Processed, MT</th> <th>Water, L</th> <th>Water/FFB</th> </tr> </thead> <tbody> <tr><td>Jan 2021</td><td>12200</td><td>16430</td><td>1.35</td></tr> <tr><td>Feb 2021</td><td>9900</td><td>15260</td><td>1.54</td></tr> <tr><td>Mar 2021</td><td>11460</td><td>14850</td><td>1.30</td></tr> <tr><td>Apr 2021</td><td>12300</td><td>14700</td><td>1.20</td></tr> <tr><td>May 2021</td><td>15180</td><td>17000</td><td>1.12</td></tr> <tr><td>Jun 2021</td><td>13200</td><td>9700</td><td>0.73</td></tr> <tr><td>Jul 2021</td><td>15330</td><td>12200</td><td>0.80</td></tr> <tr><td>Aug 2021</td><td>14610</td><td>7700</td><td>0.53</td></tr> <tr><td>Sept 2021</td><td>19740</td><td>25320</td><td>1.28</td></tr> <tr><td>Oct 2021</td><td>24510</td><td>35000</td><td>1.43</td></tr> <tr><td>Nov 2021</td><td>25360</td><td>35150</td><td>1.39</td></tr> </tbody> </table>			Month/Year	FFB Processed, MT	Water, L	Water/FFB	Jan 2021	12200	16430	1.35	Feb 2021	9900	15260	1.54	Mar 2021	11460	14850	1.30	Apr 2021	12300	14700	1.20	May 2021	15180	17000	1.12	Jun 2021	13200	9700	0.73	Jul 2021	15330	12200	0.80	Aug 2021	14610	7700	0.53	Sept 2021	19740	25320	1.28	Oct 2021	24510	35000	1.43	Nov 2021	25360	35150	1.39	Complied
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		Dec 2021	21080	28802	1.37	
		Total	194870	232112	1.19	
<p>There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc. The base line is 1.50</p>						
<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. - Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2021. The document was reviewed/updated on Jan 2021. The Environment Management Plan for efficiency of fossil fuel usage dated 03/01/2021 are detailed below:</p> <ul style="list-style-type: none"> • Monitor, reduce and record the usage of diesel monthly. • Switch off the engine when there is no operation • Reduce the usage of genset and fully utilize the turbine • Awareness training on management of diesel • Monitoring the cleanliness of skid tank area. <p>The estates and mill record and monitor the diesel utilization over the running hours of other vehicles running. Performance variation in view of several factors i.e.</p> <ol style="list-style-type: none"> a. Infrastructure of estates, b. Community size / no of gen-sets, c. No. of vehicles / age of machine. d. Weather interference / crop production volume 				Complied

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The mill used shell and fibre as fuel for boiler to reduce the usage of diesel. Sighted the usage of fibre and shell usage per FFB processed as follows:

FGVPISB Kerteh POM				
No	Month	FFB processed	Shell, MT	Fibre, MT
1	Jan 2021	12200	370.09	2703.92
2	Feb 2021	9900	400.66	2334.89
3	Mar 2021	11460	446.09	1973.62
4	Apr 2021	12300	484.08	2103.86
5	May 2021	15180	526.15	1617.68
6	Jun 2021	13200	216.64	1743.24
7	Jul 2021	15330	489.48	2150.52
8	Aug 2021	14610	587.82	2676.78
9	Sept 2021	19740	800.04	3277.31
10	Oct 2021	24510	786.15	3653.47
11	Nov 2021	25360	724.08	3058.18
12	Dec 2021	21080	587.94	3205.94
TOTAL		194870	6419.22	30499.41

The estates adopted the following practices in reducing diesel consumption in the daily operations

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A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2021 identified in the following

- Environmental Aspect Identification Summary FY 2021 reviewed accordingly.
- Environmental Impact Evaluation Summary FY 2021 reviewed accordingly.
- Renewable energy usage & diesel consumption 2021 was established and monitored by monthly basis

The diesel utilisation for the mill and estates is provided in the below table.

FGVPISB Kerteh POM				
No	Month	FFB processed	Diesel/L	Diesel/FFB
1	Jan 2021	12200	5278	0.43
2	Feb 2021	9900	5080	0.51
3	Mar 2021	11460	2824	0.25
4	Apr 2021	12300	5928	0.48
5	May 2021	15180	3833	0.25
6	Jun 2021	13200	3395	0.26
7	Jul 2021	15330	5259	0.34
8	Aug 2021	14610	4667	0.32
9	Sept 2021	19740	8529	0.43

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		10	Oct 2021	24510	8049	0.33
		11	Nov 2021	25360	7187	0.28
		12	Dec 2021	21080	5230	0.25
		TOTAL		194870	65259	0.33
		FGVPM Semaring 01 Estate				
		No	Month	Diesel	FFB	Diesel/FFB
		1	Jan 2021	1298.54	550.49	2.36
		2	Feb 2021	1604.32	548.09	2.93
		3	Mar 2021	1804.88	565.77	3.19
		4	Apr 2021	1500.52	715.85	2.10
		5	May 2021	1779.95	769.20	2.31
		6	Jun 2021	1842.22	721.63	2.55
		7	Jul 2021	2027.61	1068.60	1.90
		8	Aug 2021	2260.89	1701.75	1.33
		9	Sept 2021	2327.02	1701.55	1.37
		10	Oct 2021	2224.84	1766.94	1.26
		11	Nov 2021	1276.95	872.15	1.46
		12	Dec 2021	2239.76	1091.41	2.05
		Total		22187.50	12073.43	1.84

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		FGVAS Kerteh Estate			
No	Month	Diesel	FFB	Diesel/FFB	
1	Jan 2021	541.61	130.35	4.16	
2	Feb 2021	822.78	179.83	4.58	
3	Mar 2021	739.08	162.83	4.54	
4	Apr 2021	366.43	150.50	2.43	
5	May 2021	316.22	156.31	2.02	
6	Jun 2021	380.37	137.73	2.76	
7	Jul 2021	341.09	141.38	2.41	
8	Aug 2021	208.37	82.81	2.52	
9	Sept 2021	558.03	281.10	1.99	
10	Oct 2021	499.46	225.95	2.21	
11	Nov 2021	669.62	319.99	2.09	
12	Dec 2021	390.61	187.37	2.08	
Total		5833.66	2156.15	2.71	

Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

7.10.1	(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.	FGPI Kerteh POM and the 2 Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.	Complied
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	- Critical (Major) compliance -	<p>The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor to prevent any leakage and problem that could adversely impact the environment.</p> <p>The GHG emissions are identified and assessed for the unit certification by sustainability team. RSPO GHG Calculator version 4 is used. The consumption of fertilisers and diesel were verified through Estates:</p> <ul style="list-style-type: none"> • FFB record book • Stock book • Monthly stock issue • Stock requisition note • Mill Month End Production Report • Monthly production report • Flowmeter & running hours record book • Bio-gas generation daily monitoring log sheet • Effluent analysis report Based on the verification of records; all the sampled issuance was traceable 	
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>Management has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. The CU records NIL new development within the certified area. There is no new planting in both FGVAS Kerteh Estate and FGVPM Semaring 01 Estate.</p>	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission. An assessment of all polluting activities has been</p>	Complied

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		<p>conducted and monitored. This included the estate and mill activities. Refer "Pengenalpastian Aspek Dan Impak" Document number: FGV/FGVPM/IV/IMS/15/1.6 Rev 1 dated 22/03/2021. Among sample of activities discussed were: -</p> <p>FGVPISB Kerteh POM</p> <ul style="list-style-type: none"> • Boiler • Ramp • Steriliser • Laboratory • Weighbridge <p>FGVPM Semaring 01 Estate & FGVAS Kerteh Estate</p> <ul style="list-style-type: none"> • Harvesting • Spraying • Manuring • Tractor Driving • Rat Baiting <p>Management Action Plan 2021 is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly.</p> <p>As prescribed under DOE's Compliance Schedule, the mill is obliged to conduct stack sampling minimum once a year. Below are the verified reports:</p> <p><u>1st Quarter 2021</u></p> <ul style="list-style-type: none"> • Report no.: STK/KERTEH/21/001 • Report date: 22/04/2021 • Result: Dust: Boiler 1: 101.72 mg/m3 vs limit 150, Boiler 3: 132.42 mg/m3 vs limit 150 	
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		<p><u>2nd Quarter 2021</u></p> <ul style="list-style-type: none"> Report no.: STK/KERTEH/21/002 Report date: 28/08/2021 Result: Dust: Boiler 1: 161.95 mg/m3 vs limit 150, Boiler 3: 188.30 mg/m3 vs limit 150 <p><u>3rd Quarter 2021</u></p> <ul style="list-style-type: none"> Report no.: STK/KERTEH/21/003 Report date: 23/11/2021 Result: Dust: Boiler 1: 187.21 mg/m3 vs limit 150, Boiler 3: 125.89 mg/m3 vs limit 150 <p>Sighted Lesen Pelanggaran Licence Number 004075 with validity from 05/06/2021 to 31/12/2021. The limit was 400mg/m3 for both boilers.</p> <p>Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were established for Dark smoke emissions monitored.</p> <p>Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per Jadual Pematuhan AS(B)T:31/152/000/005 with Licence Number 004053.</p>	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>There was no land preparation of existence or new planting in FGV Estates by burning ever since the management practiced zero burning as per the policy in:</p> <ol style="list-style-type: none"> Manual Ladang Sawit LESTARI on reviewed 1/6/12 Sawit pra matang edisi II seksyen 3 Manual Ladang Sawit LESTARI reviewed on 1/6/12 Sawit matang edisi II seksyen 4 	Complied

		<p>c. Manual Ladang Sawit LESTARI 1/6/12 Pembajaan sawit edisi II seksyen 5</p> <p>d. Prosedur Kerja Selamat</p> <p>e. Manual Kelestarian (Sustainability)</p> <p>f. Work instructions</p> <p>As advocated, the estates practiced zero burning. There was no replanting programme for both estates.</p>	
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>The Group "Zero open burning" is enforced as described in the Group Sustainability Policy May 2019. The operating units adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estate. The estate has no replanting program for the incoming 5 years. There is a fire ERP team established by the estates and mill.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>FGV engaged smallholders on the fire prevention and control measures. This was mentioned in the JPPPK Meeting with stakeholders dated 18/11/2021.</p> <p>The session among others has briefed participants on the following</p> <ul style="list-style-type: none"> • <i>Memelihara dan memulihara kepelbagaian biologi</i> • <i>Pihak berkepentingan boleh melaporkan kepada FGV</i> • <i>Jika berlaku kebakaran di persempadanan kawasan ladang/kilang</i> • <i>Pihak ladang/kilang /pekebun kecil berhampiran juga boleh mendapatkan bantuan daripada FGV jika berlaku di kawasan mereka.</i> • <i>Polisi Sustainability.</i> 	Complied

Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>Auditors has verified that there is no Land Clearing since November 2005 through checking through www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at FGVAS Kerteh Estate and FGVPM Semaring 01 Estate since Nov 2005. The audit findings have confirmed that there is no new planting affecting present HCV and primary forest. There were no land clearing activities made nor had damaged any forest to protect or enhance the HCV.</p>	Complied
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>The HCV assessment was conducted with details as follows; "Laporan Penilaian Konservasi Tinggi (HCV) & Biodiversiti; Ladang FGVPM Semaring 01 dated 24/05/2018 and FGVAS Kerteh dated 03/08/2018". This report was updated and reviewed by En Amir Hamzah Dollah@Abdullah from the Due Diligence Unit, Plantations Sustainability Department respectively.</p> <p>In summary there was no HCV present in the FGVAS Kerteh Estate and FGVPM Semaring 01 Estate except for buffer zone for Sungai FGVPM Semaring 01 and Sg Balau and Boundary of Hutan Simpan Chemeron internal drainage flowing at FGVPM Semaring 01 Estate.</p> <p>The reports detailed the findings of a rapid appraisal of the biodiversity in the estates and addresses the RSPO P&C relevant to biodiversity conservation and HCV. Therein being provided details relating to the following: -</p> <ul style="list-style-type: none"> a) General biodiversity issues b) Watercourses and drainage c) Habitats natural and man-made d) Wildlife 	Complied

		<p>e) Ponds and reservoirs f) Wetlands /watercourses g) Legal aspects h) Immediate and long-term effect</p> <p>Sighted Management Plan and Monitoring Plan of HCV Area has been established for the year (2018-2023). Among topic in the management plan were: -</p> <ul style="list-style-type: none"> • Install signage at forest boundary • Monitoring of endangered species from animal sighting record • Awareness training and campaign related HCV and RTE • To cooperate with Jabatan Perhilitan <p>Sighted quarterly monitoring of wildlife and sensitive area for the year of 2021 at FGVPM Semaring 01 Estate and FGVAS Kerteh Estate. Only species like wild boar and monkey were stated in the animal sighting record.</p>	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not Applicable	Not Applicable
7.12.4	(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>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15/11/2018 in both FGVAS Kerteh Estate and FGVPM Semaring 01 Estate.</p> <p>The recent HCV assessment methodology is through site observation, interviews, stakeholder’s consultation and desktop review on available secondary data. The assessment among others covers the following areas: -</p> <ul style="list-style-type: none"> • Overview of HCV assessment. 	Complied

	- Critical (Major) compliance -	<ul style="list-style-type: none"> Description of assessment areas. Finding and discussion landscape context HCV criteria and application to agriculture <p>HCV monitoring and management Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PA/RC and personnel from the SCCD unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any. Highlights if any are discussed during the management review or management meetings subject to the urgency of the situation.</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 15/11/2018, peat land and other conservation areas.</p> <p>The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations.</p> <p>There is only common bird, presence of wild boar and monkeys occasionally sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan reviewed in Jan 2021.</p>	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>There is no RTE found the entire FGVAS Kerteh Estate and FGVP M Semaring 01 Estate as recorded, with latest the following observation /report "Laporan Penilaian Konservasi Tinggi (HCV) & Biodiversiti; Ladang FGVP M Semaring 01 and Ladang Kerteh"</p>	Complied

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7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15/11/2018 in both FGVAS Kerteh Estate and FGVPM Semaring 01 Estate. Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PA/RC and personnel from the SCCD Unit. Sighting of RTE are made and recorded during the AP rounds in the estate if any.</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>The audit findings have confirmed that there is no new land clearing affecting areas of HCVs, HCS forests peatland and other conservation areas.</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for **FGVPISB Kerteh POM** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2021** for **FGVPISB Kerteh POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.99
PKO	0.00

Extraction	%
OER	20.30
KER	5.09

Production	t/yr
FFB Process	194,870.00
CPO Produced	39,553.53
PKO Produced	9,925.42

Land Use	Ha
OP Planted Area	1081.99
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	1081.99

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	1,0686.41	1.87	0.00	0.00	0.00	0.00	10,686.41	1.87
CO ₂ Emission from fertilizer	450.38	0.08	0.00	0.00	0.00	0.00	450.38	0.08
NO ₂ Emission	366.95	0.06	0.00	0.00	0.00	0.00	366.95	0.06
Fuel Consumption	168.13	0.03	0.00	0.00	0.00	0.00	168.13	0.03
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-10,129.30	-1.78	0.00	0.00	0.00	0.00	-10,129.30	-1.78
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	1,542.57	0.27	0.00	0.00	0.00	0.00	1,542.57	0.27

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0.00	0.00
Fuel Consumption	203.61	0.00
Grid Electricity Utilization	471.27	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	674.88	0.00

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

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

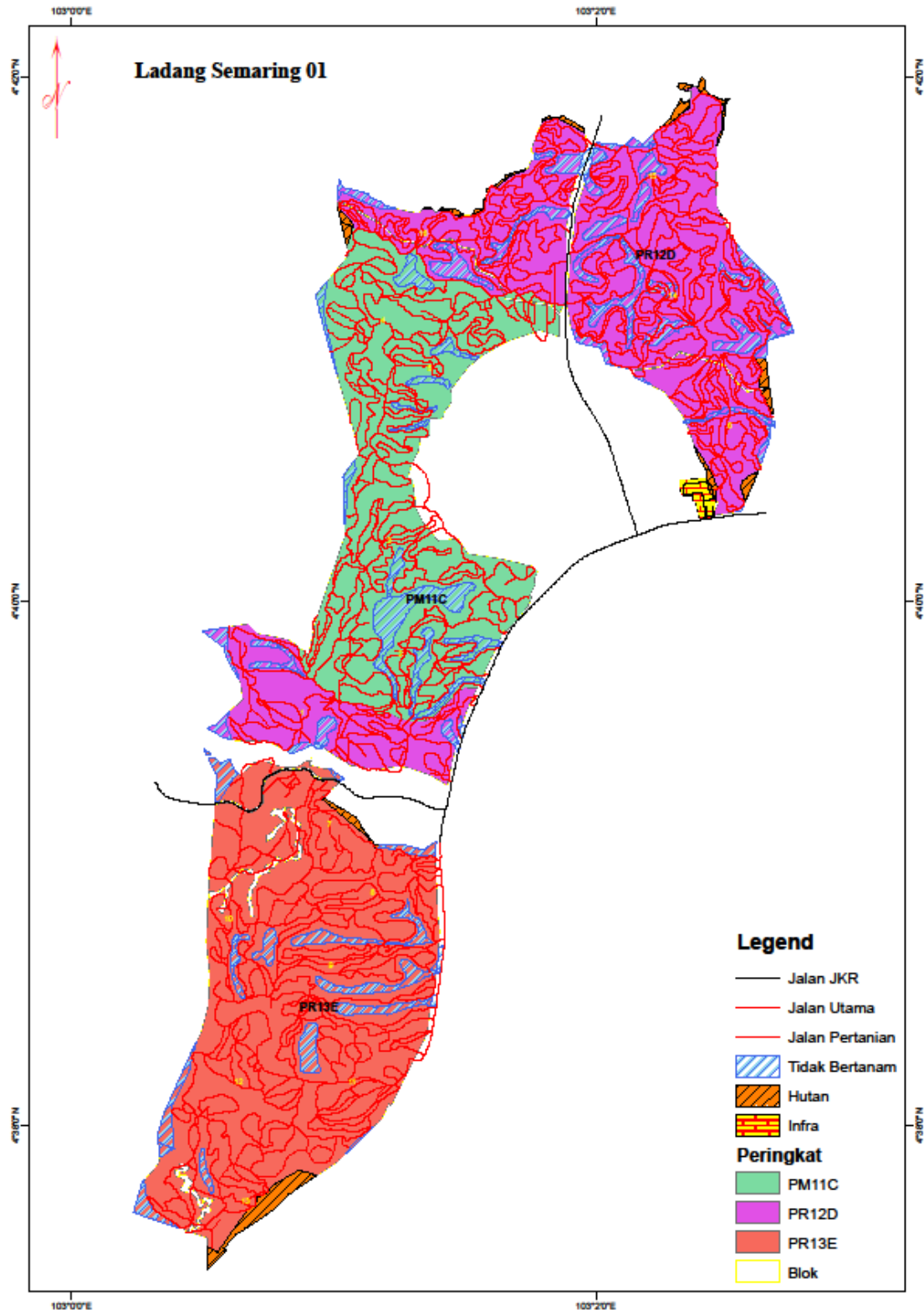
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases

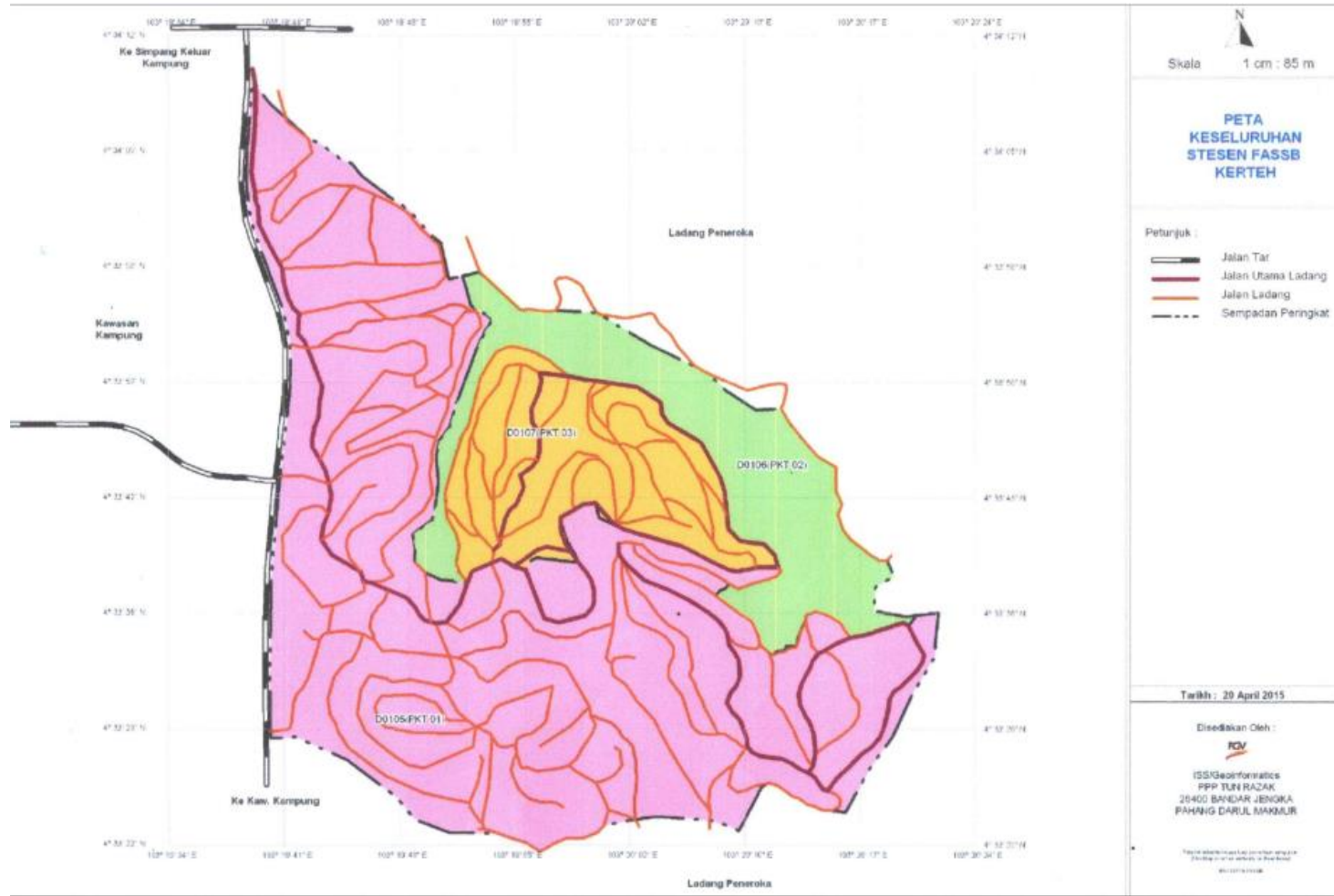


Appendix D: Estate Field Map

FGVPM Semaring 01 Estate



FGVAS Kerteh Estate



Appendix E: List of Smallholder Registered and sampled

Not Applicable

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