

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (1_1) & (1_2)
- Recertification Assessment (Choose an item.)
- Extension of Scope

GENTING PLANTATIONS BERHAD
Client company Address: 10th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia
Certification Unit: Genting Oil Mill Sdn Bhd - Genting Ayer Item Oil Mill
Location of Certification Unit: Batu 54, Jalan Johor (Ayer Hitam – Spg Renggam), 86100 Ayer Hitam, Johor, Malaysia.
Date of Final Report: 29/06/2022

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Genting Plantations Berhad		
RSPO Membership Number	1-0086-06-000-00	Membership Approval Date	14/11/2006
Address	10 th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia.		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Genting Oil Mill Sdn Bhd- Genting Ayer Item Oil Mill		
Location / Address	Batu 54, Jalan Johor (Ayer Hitam – Spg Renggam), 86100 Ayer Hitam, Johor, Malaysia		
Website	www.gentingplantations.com		
Management Representative	Mr. Arunan Kandasamy	E-mail	arunan.kandasamy@genting.com
Telephone	03-2333 6401	Facsimile	N/A

2. Certification Information			
Certificate Number	RSPO 653474	Certificate Start Date	26/03/2020
Date of First Certification	26/03/2015	Certificate Expiry Date	25/03/2025
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	To conduct a ASA1_1 and ASA1_2 surveillance assessment with an increase of 50% in sampling 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 1_1) & (ASA 1_2) <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		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	60mt / Hour
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	Standards	Certificate Issued by	Expiry Date
MSPO 696629	MSPO MS:2530-Part 3	BSI Services (M) Sdn Bhd	28/06/2023
MSPO 682363	MSPO MS:2530-Part 4	BSI Services (M) Sdn Bhd	28/06/2023
MSPO 716638	MSPO Supply Chain Certification Standard 2018	BSI Services (M) Sdn Bhd	23/10/2024
EU-ISCC-Cert-DE119-60213390	ISCC EU	ASG Cert GmbH	31/10/2022

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Genting Ayer Item Oil Mill	Batu 54, Jalan Johor (Ayer Hitam – Spg Renggam), 86100 Ayer Hitam, Johor.	1° 51' 24.20" N	103° 12' 36.00" E
Genting Kulai Besar Estate	No. 1213-1215, Jalan Kasturi 36/45, Indahpura, 81000 Kulai, Johor.	1° 36' 55.34" N	103° 36' 39.54" E
Genting Sri Gading Estate	PO Box No. 510, Jalan Bt Pahat – Kluang KM 12, Sri Gading, 83009 Bt Pahat, Johor.	1° 50' 21.49" N	103° 01' 06.02" E
Genting Sungei Rayat Estate	PO Box No. 511, Jalan Sri Gading - Pt Yaani KM 5, Sri Gading, 83009 Bt Pahat, Johor.	1° 54' 14.19" N	103° 00' 38.40" E
Genting Tanah Merah Estate	PO Box No.68, Jalan Tangak – Segamat KM 3, 84907 Tangkak, Johor.	2° 16' 53.94" N	102° 33' 37.17" E
Genting Tebong Estate	Jalan Tebong – Batang Melaka KM 4, 76460 Tebong, Melaka.	2° 27' 20.05" N	102° 21' 38.44" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Kulai Besar Estate	2,027.37	35.06	779.62	2,842.05	71.30
Genting Sri Gading Estate	3,309.73	29.93	391.72	3,731.38	88.70
Genting Sungei Rayat Estate	2,300.78	0.18	78.02	2,378.98	96.70
Genting Tanah Merah Estate	2,044.96	46.60	150.49	2,242.05	91.20

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Genting Tebong Estate	2,872.40	45.29	92.04	3,009.73	95.40
Total	12,555.24	157.06	1,491.89	14,204.19	88.4

Note: Total planted and infras are higher than previous reported due to resurvey for replanting program.

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Kulai Besar Estate	648.88	448.23	373.85	325.54	230.87	1,378.49	648.88
Genting Sri Gading Estate	642.91	830.96	739.16	632.87	463.83	2,666.82	642.91
Genting Sungei Rayat Estate	241.70	380.38	1,099.87	498.87	79.96	2,059.08	241.70
Genting Tanah Merah Estate	272.41	455.85	527.34	369.28	420.08	1,772.55	272.41
Genting Tebong Estate	532.18	548.24	534.66	817.63	439.69	2,340.22	532.18
Total (ha)	2,338.08	2,663.66	3,274.88	2,644.19	1,634.43	10,217.16	2,338.08

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Mar 20 – Feb 22)	Actual (Feb 2020 – Jan 2022)		Forecast (Mar 22 – Feb 23)
		Previous license period (Feb 2020 – Feb 2021)	Current license period (Mar 2021 – Jan 2022)	
Genting Kulai Besar Estate	75831.4303	38,805.48	30,317.04	34,515.00
Genting Sri Gading Estate	130423.034	62,948.45	51,674.45	60,710.00
Genting Sungei Rayat Estate	105906.716	53,770.62	42,003.73	46,800.00
Genting Tanah Merah Estate	61861.4138	28,736.30	26,156.38	23,125.00
Genting Tebong Estate	41205.4058	28,682.22	32,245.86	46,050.00
Total	415,228.00	395,340.53		211,200.00

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Mar 20 – Feb 22)	Actual (Feb 2020 – Jan 2022)		Forecast (Mar 22 – Feb 23)
		Previous license period (Feb 2020 – Feb 2021)	Current license period (Mar 2021 – Jan 2022)	
NA		-	-	
Total				

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Mar 20 – Feb 22)	Actual (Feb 2020 – Jan 2022)		Forecast (Mar 22 – Feb 23)
		Previous license period (Feb 2020 – Feb 2021)	Current license period (Mar 2021 – Jan 2022)	
NA	-	-	-	-
Total				

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	Feb-2020	14,296.83	0	14,296.83
2	Mar-2020	15,800.88	0	15,800.88
3	Apr-2020	18,105.81	0	18,105.81
4	May-2020	18,304.66	0	18,304.66
5	Jun-2020	20,516.50	0	20,516.50
6	Jul-2020	18,910.81	0	18,910.81
7	Aug-2020	17,909.81	0	17,909.81
8	Sep-2020	17,054.17	0	17,054.17
9	Oct-2020	15,635.06	0	15,635.06
10	Nov-2020	15,348.52	0	15,348.52
11	Dec-2020	14,243.52	0	14,243.52
12	Jan-2021	12,996.46	0	12,996.46
13	Feb-2021	13,820.04	0	13,820.04
14	Mar-2021	18,140.27	0	18,140.27
15	Apr-2021	17,601.26	0	17,601.26
16	May-2021	17,508.79	0	17,508.79
17	Jun-2021	16,280.03	0	16,280.03
18	Jul-2021	17,236.86	0	17,236.86
19	Aug-2021	16,901.85	0	16,901.85
21	Sep-2021	16,679.95	0	16,679.95
22	Oct-2021	16,937.79	0	16,937.79
23	Nov-2021	15,751.77	0	15,751.77
24	Dec-2021	15,826.71	0	15,826.71

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25	Jan-2022	13,532.18	0	13,532.18
TOTAL		395,340.53	0	395,340.53

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (Mar 20 – Feb 22)	Actual (Feb 2020 – Jan 2022)		Forecast (Mar 22 – Feb 23)
	Previous license period (Feb 2020 – Feb 2021)	Current license period (Mar 2021 – Jan 2022)	
FFB	FFB		FFB
415,228.00 mt	212,943.07 mt	182,397.46 mt	211,200.00 mt
	395,340.53 mt		
CPO (OER: 20.76 %)	CPO (OER: 20.31 %)		CPO (OER: 20.50 %)
86,202.36 mt	42,789.60 mt	36,965.22 mt	43,296.00 mt
	79,754.82 mt		
PK (KER: 5.43 %)	PK (KER: 5.33 %)		PK (KER: 5.50 %)
22,537.98 mt	10,899.63 mt	9,707.63 mt	11,616.00 mt
	20,607.26 mt		

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Feb-2020	2,992.438	754.956
2	Mar-2020	3,239.050	824.914
3	Apr-2020	3,584.636	880.291
4	May-2020	3,718.206	916.099
5	Jun-2020	4,006.068	968.611
6	Jul-2020	3,818.379	967.886
7	Aug-2020	3,608.969	964.077
8	Sep-2020	3,393.301	935.515
9	Oct-2020	3,173.620	807.269
10	Nov-2020	3,096.589	771.651
11	Dec-2020	2,821.830	681.020
12	Jan-2021	2,501.774	684.871
13	Feb-2021	2,834.735	742.469
14	Mar-2021	3,642.943	991.027
15	Apr-2021	3,497.770	964.095
16	May-2021	3,553.203	913.821

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17	Jun-2021	3,367.959	817.106
18	Jul-2021	3,515.313	889.130
19	Aug-2021	3,378.502	976.091
21	Sep-2021	3,369.222	917.885
22	Oct-2021	3,488.163	881.917
23	Nov-2021	3,167.782	832.501
24	Dec-2021	3,282.083	846.328
25	Jan-2022	2,702.279	677.729
TOTAL		79,754.82	20,607.26

11. Summary of Actual Volume sold
Current License period (Mar 21 – Jan 22)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	37,032.68	0	0	0	37,032.68
PK (MT)	9,707.48	0	0	0	9,707.48
Credits	0	0	0	0	0

Previous License period (Feb 2020 – Feb 2021)

CPO (MT)	39,661.31	0	0	2,838.71	42,500.02
PK (MT)	10,484.75	0	0	400.12	10,884.87
Credits	0	0	0	0	0

Note:

1. Conventional is RSPO certified material but sold as non-RSPO.
2. CPO Opening Stock for March 2021 - 351.92 mt

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

No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1.	XXX	RSPO_PO10000001xx	6,644.65	-
2.	XXX	RSPO_PO10000001xx	21,452.46	-
3.	XXX	RSPO_PO10000001xx	803.42	-
4.	XXX	RSPO_PO10000019xx	831.81	-
5.	XXX	RSPO_PO10000000xx	3,236.74	-
6.	XXX	RSPO_PO10000071xx	-	1,245.86
7.	XXX	RSPO_PO10000029xx	-	6,939.06

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8.	XXX	RSPO_PO10000009xx	3,800.19	-
9.	XXX	RSPO_PO10000001xx	196.44	-
10.	XXX	RSPO_PO10000103xx	-	1,655.96
11.	XXX	RSPO_PO10000001xx	502.48	-
12.	XXX	RSPO_PO10000001xx	20,186.92	-
13.	XXX	RSPO_PO10000019xx	694.43	-
14.	XXX	RSPO_PO10000000xx	3,809.6	-
15.	XXX	RSPO_PO10000071xx	-	4,024.69
16.	XXX	RSPO_PO10000029xx	-	4476.4
17.	XXX	RSPO_PO10000009xx	4,501.87	-
18.	XXX	RSPO_PO10000001xx	3,097.11	-
19.	XXX	RSPO_PO10000105xx	-	1,543.45
20.	XXX	RSPO_PO10000004xx	201.16	-
21.	XXX	RSPO_PO10000103xx	1,400.45	-
22.	XXX	RSPO_PO10000003xx	5,334.26	-
23.	XXX	RSPO_PO10000108xx	-	205.85
24.	XXX	RSPO_PO10000106xx	-	100.96
TOTAL			76,693.99	20,192.23

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.	XXX	201.65	-
2.	XXX	303.42	-
3.	XXX	499.33	--
4.	XXX	1834.31	
5.	XXX	-	400.12
TOTAL		2,838.71	400.12

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)

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No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
-	-	-	-
TOTAL			-

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

13. Independent Smallholders Actual Sold Tonnage / Volume (NA)						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period						
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

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **22nd February 2022 – 25th February 2022**. The audit programme is included as Section 2.3. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat. The remote audit was conducted on **24/2/2021 – 25/2/2021**. Prior to the remote audit, Information Security Measures was agreed with Client on **5/2/2021**. The remaining on-site assessment was conducted on dates stated above with an increase of 150% in sampling.

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 **20th May 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.

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Genting Ayer Item Oil Mill	✓	✓	✓	✓	✓
Genting Kulai Besar Estate	-	✓	✓	✓	✓
Genting Sri Gading Estate	✓	-	✓	-	✓
Genting Sungei Rayat Estate	-	✓	✓	-	✓
Genting Tanah Merah Estate	✓	-	✓	✓	-
Genting Tebong Estate	✓	✓	✓	✓	-

Tentative Date of Next Visit: February 20, 2023 - February 24, 2023

Total Number of Mandays: 23.5 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 Introductory Training g 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, Estate Best Practises and supply chain requirements.</p> <p>Language proficiency: He is fluent in English, Bahasa Malaysia, Tamil languages.</p>
HU NING SHING (HNS)	Team Member	<p>Education: Holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011.</p> <p>Work Experience: She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body.</p> <p>Training attended: She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012, Endorsed RSPO SCCS Lead Auditor Course in 2015 and also trained in SMETA Requirement Training in April 2021.</p> <p>Aspect covered in this audit: During this assessment, she assessed on the aspects of social, legal, workers & stakeholders consultation and SCC for CPO mill.</p> <p>Language proficiency: She is fluent in Bahasa Malaysia and English languages.</p>
AMIR BAHARI (AB)	Team Member	<p>Education: Holds a Bachelor of Science (Hons) in Chemistry, University Science Malaysia & a Diploma in Palm Oil Milling Tech/Management, Malaysian Palm Oil Board.</p> <p>Work Experience: He has more than 30 years of plantation experience including managing rubber factories, palm oil mills and estates. Since 2014 he has started auditing professionally for varies scheme including RSPO and MSPO for varies accredited certification body.</p> <p>Training attended: He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course & Endorsed RSPO P&C Lead Auditor Course.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of Environment, HCV and estate best practises.</p>

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		<p>Language proficiency: He is fluent in both verbal/written in Bahasa Malaysia and English.</p>
MUHAMAD NAQUIDDIN MAZELI (MNM)	Team Member	<p>Education: Holds a Bachelor of Science Horticulture, University Putra Malaysia</p> <p>Work Experience: 11 years working experience in oil palm industry managing sustainability implementation and certification of RSPO P&C, ISCC, and ISO9001 and ISO 18001 for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO and other certifications where applicable to the operations during previous company.</p> <p>Training attended: He has completed ISO 9001: 2015 Lead Auditor Course, ISO 14001: 2015 Lead Auditor Course, ISO 45001: 2018 Lead Auditor Course, HCV & HCS Introductory Training, Endorsed RSPO P&C Lead Auditor Course and Social Auditing & SMETA Training</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, Smallholders inclusion, legal requirements, environment, RSPO supply chain and HCV.</p> <p>Language proficiency: He is fluent in English and Bahasa Malaysia languages.</p>
MOHD RAZALEIGH MOHAMAD (MRM)	Team Member	<p>Education: Holds a Bachelor Degree in Plantation Management and Agrotechnology, 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>
HAFRIAZHAR MOHD MOKHTAR (HMM)	Team Member	<p>Education: Holds a Bachelor of Engineering (Hons.) Chemical Engineering, University Technology Malaysia</p> <p>Work Experience: He has 20 years of working experience in multiple engineering disciplines emphasized on science, technology and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation and mining before auditing. In summary, his started his career as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in palm oil mill, Project Control Engineer (2008-2011) in mining and Auditor (2011-present) with accredited certification bodies.</p> <p>Training attended: He has completed Social Auditing & SMETA Training, HCV & HCS Introductory Training, ISO 45001 LA Training, MSPO LA Training,</p>

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		<p>Endorsed RSPO SCCS LA Training, Endorsed RSPO P&C LA Training, ISO 9001 LA Training, ISO 50001 LA Training, and ISO 14001 LA Training</p> <p>Aspect covered in this audit: During this audit, he covered Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue and RSPO Supply Chain, HCV, General Custody of Chain, Rules on Market Communications & Claims.</p> <p>Language proficiency: He is fluent in Bahasa Malaysia and English languages.</p>
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Accompanying Persons:

Name	Role
Nicholas Cheong	Qualifying Reviewer – For MRM & HMM

1.3 Assessment Plan

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

Date	Time	Subjects	Team A			Team B		
			VKP	HNS	AB	MNM	MRM	HMM
Monday, 21/02/2022	1500 - 1900	Auditors travel from Kuala Lumpur to Batu Pahat (Team A) & Tampin (Team B).	✓	✓	✓	✓	✓	✓
Tuesday, 22/02/2022 GTBE & GSGE	0800 - 0900	Team A: Travel from Batu Pahat to Genting Sri Gading Estate Team B: Travel from Tampin to Genting Tebong Estate	✓	✓	✓	✓	✓	✓
	0900 - 0930	Opening Meeting @ Genting Sri Gading Estate: - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation).	✓	✓	✓	-	-	-
	0930 - 1230	Genting Sri Gading Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓	-	-	-
Genting Tebong Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.		-	-	-	✓	✓	✓	

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Date	Time	Subjects	Team A			Team B		
			VKP	HNS	AB	MNM	MRM	HMM
	1000 - 1200	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	✓	-	-	✓	-
	1230 - 1330	LUNCH BREAK						
	1330 - 1630	Genting Sri Gading Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓	-	-	-
		Genting Tebong Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	-	-	-	✓	✓	✓
1630 - 1700	Interim Closing Briefing	✓	✓	✓	✓	✓	✓	
Wednesday, 23/02/2022	0800 - 0900	Team A: Travel to Genting Ayer Item Oil Mill Team B: Travel to Genting Tanah Merah Estate	✓	✓	✓	✓	✓	✓

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Date	Time	Subjects	Team A			Team B			
			VKP	HNS	AB	MNM	MRM	HMM	
GTME & GAIOM	0900 - 1230	Genting Ayer Item Oil Mill 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.	✓	✓	✓	-	-	-	
		Genting Tanah Merah Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, 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	Genting Ayer Item Oil Mill 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	✓	✓	✓	-	-	-	

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Date	Time	Subjects	Team A			Team B		
			VKP	HNS	AB	MNM	MRM	HMM
		Genting Tanah Merah Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	-	-	-	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓	✓	✓	✓
Thursday, 24/02/2022 GKBE & GSRE	0800 - 0900	Team A: Travel to Genting Kulai Besar Estate Team B: Travel to Genting Sungei Rayat Estate	✓	✓	✓	✓	✓	✓
	0900 - 1230	Genting Kulai Besar Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓	-	-	-
		Genting Sungei Rayat Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, 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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Date	Time	Subjects	Team A			Team B		
			VKP	HNS	AB	MNM	MRM	HMM
	1330 - 1630	Genting Kulai Besar Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓	-	-	-
		Genting Sungei Rayat Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	-	-	-	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓	✓	✓	✓
Friday, 25/02/2022 GAIOM (Mill)	0800 - 0900	Travel to Genting Ayer Item Oil Mill	✓	✓	-	✓	-	-
	0900 - 1130	Genting Ayer Item Oil Mill RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	✓	✓	-	✓	-	-
	1130 - 1200	Verify any Outstanding Issues and Preparation for Closing Meeting	✓	✓	-	✓	-	-
	1200 - 1300	Closing Meeting	✓	✓	-	✓	-	-
	1300	Auditors travel back to Kuala Lumpur	✓	✓	-	✓	-	-

Critical NC Closure Verification Assessment Plan

Date	Time	Subjects	VKP
Friday, 20.05.2022	0900 – 0930	Opening Meeting at Genting Sungei Rayat Estate : - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan	✓
	0930 – 1230	1. Verification on Critical NC: <ul style="list-style-type: none"> • 2165594-202202-M1 • 2165594-202202-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 time bound plan has included all the subsidiaries of Genting Plantations Berhad. The TBP includes all units in Malaysia and Indonesia. The detail of the subsidiaries and the management units is as per Approved Time Bound Plan below.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	No. As stated in the updated time bound plan, the management of Genting Plantations Berhad has plan to certify all the complexes until October 2023. The updated time bound plan dated 09/11/2021 shows that the plan spans from year 2014 until year 2023. The delays are due to the following factors: 1) Some estates in Indonesia are in progress to obtain their Hak Guna Usaha (HGU). 2) PT SP, KMJ, DWK is in the process of obtaining Forest Release and Forest Exchange prior to HGU application. 3) RACP in progress for Genting Kencana Estate. 4) Standalone HCSA reports are in progress to be peer reviewed. 5) NPP in progress for PT SISM, PT SMA (additional areas) and PT KIU	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	No new acquisitions as of Nov 2021. Nonetheless, there is a three parts of expansion of land area at PT Sepanjang Inti Surya Mulia i.e. Area 199 Ha, Area 100 Ha and Area 1300 Ha. As per comment in table below, the required assessments were being conducted and in progress.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No deviations	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No changes in the 100% certification targets, except for adjustment of dates for planned certification. ACOP Reporting has been verified and found to be consistent.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	There are no lapses in implementation of the plan.	Complied

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

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Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No outstanding labour disputes. <u>Indonesian Operating Unit</u> SOP - HRD-04-00.00 Penyelesaian Keluh Kesah <u>Malaysian Operating Unit</u> SMP-GPB-19 Complaints and Grievances	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	In progress to obtain Hak Guna Usaha (HGU). Refer to TBP (9 Nov 2021)	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. Sustainability Dept conducts the internal audit. Positive Assurance Statement 2021 was made available for verification.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	None raised.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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

Approved Time Bound Plan

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

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13	Genting Tanjung Bahagia Sdn Bhd (100%) for estates	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah Oil Mill, Sabah, Malaysia	July,2022		Concept Note for RACP approved on 19/11/2021. RACP plan submitted and awaiting for approval.
14	Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Permai Estate, Sabah, Malaysia				
15		Genting Kencana Estate, Sabah, Malaysia				
16	Genting Oil Mills (Sabah) Sdn Bhd (100%) for estate and mill	Genting Jambongan Estate, Sabah, Malaysia	Supply base for Genting Jambongan Oil Mill, Sabah, Malaysia	Sept 2019	Certified	None
17	Genting Plantations Bhd Wawasan Land Progress Sdn Bhd (100%) Genting Oil Mills (Sabah) (Mill)	Genting Sekong Estate, Sabah, Malaysia	Supply base for Genting Trushidup Oil Mill, Sabah, Malaysia	Sept,2017	Certified	None
18	Asiaticom Sdn Bhd (100%) Sawit Sukau Usahasama Sdn Bhd(56%)	Genting Suan Lamba Estate, Sabah, Malaysia				
19	PT Sepanjang Intisurya Mulia (70%)	Mulia 1 & 2 Mulia 3 & 4 Mulia 5 & 6	Supply base for Mulia Oil Mill, Kalimantan, Indonesia	Oct, 2017	Certified	None
20	PT Sawit Mitra Abadi (70%)	Abadi 1 & 2 Abadi 3 & 4				

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21	PT Sepanjang Intisurya Mulia (70%)	Area 199 Ha Area 1300 Ha	Supply base for Mulia Oil Mill, Kalimantan, Indonesia	Oct,2023		In Process of NPP In Process of NPP In process of obtaining HGU.
22	PT Sawit Mitra Abadi (70%)	Area 1000 Ha				NPP Process In process of obtaining HGU. HCS Report completed peer review.
23	Genting Plantations Berhad (100%)Estate Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Mewah Estate, Sabah, Malaysia	Supply base for Genting Mewah Oil Mill, Sabah, Malaysia	Mar,2017	Certified	None
24	Genting Plantations (WM) Sdn Bhd (100%)	Genting Bukit Sembilan Estate, Kedah, Malaysia		July,2017	Certified	None
25	PT Globalindo Agung Lestari (60%)	Lamunti Barat Estate Lamunti Timur Estate I &II Mengkatip Estate I & II Bakuta Estate Plasma Timur & Barat	Supply base for Globalindo Oil Mill, Kalimantan, Indonesia	Aug, 2022		NPP and HCSA Report completed for PT UAI. In the process of obtaining HGU for UAI.

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26	PT United Agro Indonesia(60%)	PT UAI 1 & 2 UAI Plasma		Oct, 2023		
27	PT Susantri Permai (95%)	Puroh Estate Masaha Estate Zircon Hill Estate	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia	Oct, 2023		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		SP Plasma		Oct, 2023		
28	PT Kapuas Maju Jaya (95%)	Waterfall Estate I & II Muhun Estate I & II Talawang Estate I & II	Supply bases for Golden Hill Oil Mill, Kalimantan Indonesia	Oct, 2023		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		KMJ Plasma		Oct, 2023		
29	PT Dwie Warna Karya (95%)	Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate		Oct, 2023		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		DWK Plasma		Oct, 2023		
30	PT Citra Sawit Cemerlang (70%)	CSC Estates	Supply base for Mulia Oil Mill	Oct, 2023		In process of obtaining HGU. HCSA report completed review.

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31	PT Surya Agro Palma (70%)	SAP Estate 1&2 SAP Estate 3&4 SAP Estate 5&6	Supply base for Cemerlang Oil Mill, Kalimantan, Indonesia	Sept, 2023		In process of obtaining HGU. HCSA report completed review.	
		Plasma		Sept, 2023			
32	PT Agro Abadi Cemerlang (70%)	AAC 1 & 2			Sept, 2022		In process of obtaining HGU HCSA report completed review. Report not published yet.
		AAC 3 & 4					
		Plasma – KSK1, KMB, BSL			Sept, 2023		
33	PT Palma Agro Lestari Jaya (70%)	PALJ Estates			Dec,2023		In process of obtaining HGU. HCSA report completed review.
		PALJ Plasma					
34	Knowledge One Investment Pte Ltd (85%)-PT Kharisma Inti Usaha (KIU)	KIU 1 & 2 KIU 3 & 4	Supply base for KIU Oil Mill	July,2022		NPP in progress. HCV report approved by HCVRN. HCSA report is completed and waiting for peer review.	
		KIU Plasma		July 2022			

3.3 Details of Nonconformities

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

During this Assessment there were Two (2) Critical; Four (4) Minor nonconformities and Six (6) Opportunity For Improvement raised. The Genting Ayer Item Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2165594-202202-M1	Date Issued	25/02/2022
Due Date	25/05/2022	Date of nonconformity Closure	20/05/2022
Clause & Category (Critical / Minor)	6.2.4 (Critical)		
Statement of Nonconformity:	Workers quarters has not been properly maintained.		
Requirement Reference:	The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.		
Objective Evidence:	<p>Line site inspection has been done by the management on weekly basis and has been verified for inspection on 25/01/2022, 18/01/2022 and 11/01/2022. As per line site inspection, no issues have been highlighted during the inspection. However, during the site visit to Home Division Labor Quarter, Genting Tebong Estate, it was found that,</p> <ol style="list-style-type: none"> 1. Grass cutting has not been done and unmanageable. 2. Domestic waste has not been properly managed and disposed. 3. Blocked and damage drainage system 4. Unrepaired mosquitoes netting. 5. Illegal electrical wiring. 6. Damaged harvesting equipment has not been properly disposed. 		
Corrections:	<ol style="list-style-type: none"> 1. Immediately cut the grass by hiring one grass cutter. 2. Immediately clear & remove the domestic wastes. 3. Clear and clean up the drainages. 4. Engage contractors immediately and repaired the mosquito nettings. 5. Immediately removed the illegal wirings, and did proper installation. 		

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	6. Removed and disposed all the damaged harvesting equipment from the line site immediately.																		
Root Cause Analysis:	<table border="1"> <tr> <td>a</td> <td>Grass cutting has not been done and unmanageable.</td> <td>Estate fail to replace new worker (due to workers shortage) for grass cutting a month after the previous worker repatriated.</td> </tr> <tr> <td>b</td> <td>Domestic waste has not been properly managed and disposed.</td> <td>No permanent line sweeper.</td> </tr> <tr> <td>c</td> <td>Blocked and damage drainage system</td> <td>HA failed and/or missed to check thoroughly the drainages during the linesite inspection, and failed to report the actual condition.</td> </tr> <tr> <td>d</td> <td>Unrepaired mosquitoes netting</td> <td>Budget approved, but delayed in obtaining the quotations.</td> </tr> <tr> <td>e</td> <td>Illegal electrical wiring</td> <td>No safety training given to the workers regarding the illegal wiring/house electric safety.</td> </tr> <tr> <td>f</td> <td>Damaged harvesting equipment has not been properly disposed.</td> <td>Lack of awareness by harvesters.</td> </tr> </table>	a	Grass cutting has not been done and unmanageable.	Estate fail to replace new worker (due to workers shortage) for grass cutting a month after the previous worker repatriated.	b	Domestic waste has not been properly managed and disposed.	No permanent line sweeper.	c	Blocked and damage drainage system	HA failed and/or missed to check thoroughly the drainages during the linesite inspection, and failed to report the actual condition.	d	Unrepaired mosquitoes netting	Budget approved, but delayed in obtaining the quotations.	e	Illegal electrical wiring	No safety training given to the workers regarding the illegal wiring/house electric safety.	f	Damaged harvesting equipment has not been properly disposed.	Lack of awareness by harvesters.
a	Grass cutting has not been done and unmanageable.	Estate fail to replace new worker (due to workers shortage) for grass cutting a month after the previous worker repatriated.																	
b	Domestic waste has not been properly managed and disposed.	No permanent line sweeper.																	
c	Blocked and damage drainage system	HA failed and/or missed to check thoroughly the drainages during the linesite inspection, and failed to report the actual condition.																	
d	Unrepaired mosquitoes netting	Budget approved, but delayed in obtaining the quotations.																	
e	Illegal electrical wiring	No safety training given to the workers regarding the illegal wiring/house electric safety.																	
f	Damaged harvesting equipment has not been properly disposed.	Lack of awareness by harvesters.																	
Corrective Actions:	<ol style="list-style-type: none"> To train management team not to compromise on housing condition, and that immediate actions must be taken ie. engage 3rd party contractor to cut grass, carrying out repair works etc. One dedicated permanent line sweeper had been assigned daily to maintain the Labour Quarter cleanliness. To ensure estate staff/executive to accompany (at least once a month) the HA during his weekly linesite inspection. This is part of monitoring process so that the actual condition is assessed and reported by HA. To ensure all wiring works are installed only by qualified wireman. Therefore, to provide training to management team and workers that the workers shall be prohibited from carrying out any wiring works on their own. To train harvesters that damaged harvesting equipment shall be disposed accordingly. 																		
Assessment Conclusion:	<p><u>Critical NC Close Out Verification</u></p> <ol style="list-style-type: none"> Immediate Correction has been done by the estate as below: <ul style="list-style-type: none"> Grass cutting has been fully done in the estate linesite and completed on 15/04/2022. Domestic waste disposal have been cleared effectively on 25/04/2022. Blocked and damage drainage system have been cleaned and repaired, completed on 04/04/2022. Mosquitoes netting have been installed and completed on 23/03/2022 Proper electrical wiring was installed by a licensed wireman and completed on 15/03/2022. 																		

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	<ul style="list-style-type: none"> - Damaged harvesting equipment have all been cleared by 18/03/2022. <ol style="list-style-type: none"> 2. The management have trained the staffs and workers on linesite cleanliness, domestic waste, illegal wirings and disposal of unused harvesting tools on 01/03/2022. 3. The management have placed a permanent line sweeper to ensure cleanliness of the linesite. This was evident in the sampled master chits. 4. Latest linesite inspection records were sampled and found to be similar to the field visit observation. <p>Based on the evidence provided and the visit to the mill's effluent pond it was found that the corrections and corrective action plans have been addressed accordingly. Therefore, the Critical Non-Conformity is successfully closed on 20/05/2022.</p>
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Non-conformity			
NCR Ref #	2165594-202202-M2	Date Issued	25/02/2022
Due Date	25/05/2022	Date of nonconformity Closure	20/05/2022
Clause & Category (Critical / Minor)	6.2.3 (Critical)		
Statement of Nonconformity:	EPF contribution for Malaysian workers has not been done.		
Requirement Reference:	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.		
Objective Evidence:	Sample of workers has been taken by auditor and personal document (employment contract, payslips, check roll records, permit/passport and EPF contribution) for month May, June and November 2021 has been verified. Sighted there is no contribution been made for the sampled Malaysian workers. This contradicts with what has been mentioned in Employee Provident Fund (EPF) Act 1991.		
Corrections:	<ol style="list-style-type: none"> 1. To immediately open EPF account number for the 2 local workers in Sing Mah Division. 2. The workers had been registered, their EPF number obtained and Management will cooperate with EPF officer to re-contribute back the EPF contribution for the previous 5 months. 		
Root Cause Analysis:	The local workers procrastinate in providing EPF number to the Management despite several reminders, and inadequate follow up by the management.		
Corrective Actions:	<p>IT to implement a control in the estate's business application (Lintramax), timeline to complete early May 2022.</p> <p>For example, the system will restrict the user from printing the Performa (Payslip) of local workers if user have not input their EPF details.</p>		
Assessment Conclusion:	<u>Critical NC Close Out Verification</u>		

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	<ol style="list-style-type: none"> 1. The estate management have opened an EPF account for the 7 identified workers without a current EPF account. Sighted the document "Penerimaan Permohonan" and "Akuan Pendaftaran" dated 16/02/2022 available for verification. 2. The management have re-contributed back the EPF contribution for the 7 identified workers for the months Jan 2021 – Jan 2022. The "Payment of EPF Contribution" dated 18/05/2022 was available for verification. EPF "Borang A" was verified to include all backdated payments. 3. Office Clerks were trained on Checkroll, Salary Payments and Workers EPF Contribution on 18/03/2022. Records of training were available for verification. 4. The Lintramax system has been updated to trigger a warning if the EPF details of workers are not inserted, prior to printing the workers payslips. <p>Based on the evidence provided and the visit to the mill's effluent pond it was found that the corrections and corrective action plans have been addressed accordingly. Therefore, the Critical Non-Conformity is successfully closed on 20/05/2022.</p>
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Non-conformity			
NCR Ref #	2165594-202202-N1	Date Issued	25/02/2022
Due Date	Next Annual Surveillance	Date of nonconformity Closure	"Open"
Clause & Category (Critical / Minor)	3.4.2 (Minor)		
Statement of Nonconformity:	Social management plan has not been properly established, implemented and monitored.		
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:	<p>Social impact assessment management plan for Genting Tebong Estate for issues raised during the assessment has been established and updated on 04/01/2021 and has been done with participation of stakeholders.</p> <p>Among samples of issues stated is from the temple that has requested to recognize the committee, for them to receive funds from the government. As stated in the management plan, explanation was made to temple representative, that the estate management only recognized the temple if all the committee members are estate workers. It has been confirmed that explanation has been done through interview with the temple representatives.</p> <p>The issues have been identified as closed, however, feedback from the temple representative shows that he was not included in the establishment of the management plan and he is still trying to get recognition from the estate.</p>		
Corrections:	Update social management plan to open the issue again and include him as part of the team too until the matter is resolved.		
Root Cause Analysis:	Management in impression that the issue was closed earlier. Furthermore, the temple representative did not highlight the issue again for the management's attention.		

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Corrective Actions:	To re-brief all stakeholders that any issues shall be directed to the management team, either via walk-in, write in complaint book, phone call, Whatsapp, email etc. Brief management team that to include the respective stakeholders during establishing the social management plan, and later during the implementation and monitoring stage too.
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.

Non-conformity			
NCR Ref #	2165594-202202-N2	Date Issued	25/02/2022
Due Date	Next Annual Surveillance	Date of nonconformity Closure	"Open"
Clause & Category (Critical / Minor)	6.7.2 (Minor)		
Statement of Nonconformity:	First aid kit available at worksites containing insufficient first aiding materials.		
Requirement Reference:	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.		
Objective Evidence:	<p>Inspection of first aid kits during visit to the estate worksites found that the First aid kit available at worksites containing insufficient first aiding materials as following:</p> <p><u>Genting Tanah Merah Estate (GTME):</u></p> <ul style="list-style-type: none"> - P&D Spraying worksite Field # OP19: First aid drops wash not available. Burn-aid cream (CCM) was expired on 07/2021. - Harvesting worksite Field OP95A: Burn-aid cream (CCM) was expired on 03/2021. <p><u>Genting Sungei Rayat Estate (GSRE):</u></p> <ul style="list-style-type: none"> - Harvesting worksite Field OP97 (Tanjung Division): Sterile eye pads was expired on 10/2021. - Creepers manual removal worksite Field OP18D (Bangkar Division): Sterile eye pads was expired on 10/2021 - Workshop: Sterile eye pads was expired on 10/2021. 		
Corrections:	Immediately replenish the first aid boxes after dispose-off the expired materials.		
Root Cause Analysis:	Inadequate training by estate management for newly appointed Hospital Assistants (HAs) at both GTME & GSRE.		
Corrective Actions:	1. Refresher training for HA on identifying and replenishing expired items in the First Aid Box.		

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	2. During workplace inspection using the standard checklist, Assistant Manager/OSH committee to alert the HA and person in charge of first aid box on monthly inspection the items of expiry date & action to be taken for replacement.
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.

Non-conformity			
NCR Ref #	2165594-202202-N3	Date Issued	25/02/2022
Due Date	Next Annual Surveillance	Date of nonconformity Closure	"Open"
Clause & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	Found the disposal of waste material was not according to procedure.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<ul style="list-style-type: none"> – Sighted in GTME during verification on clinical waste SW 404 was disposed in dustbin at the back of the clinic. From the interview with Hospital assistant, he was not aware regarding the type of clinical wastes that must be disposed as SW 404. – In GSRE, sighted 11 oil drums (SW 409) at recycle waste store and not store in Schedules waste store. This is not in accordance as per SMP-GPB-11 Rev 01 dated 11/6/2018, that states that <i>"All SWs are to be orderly and safely stored in an appropriate designated SWs store pending disposal."</i> 		
Corrections:	<ol style="list-style-type: none"> 1. Immediately collect back the clinical waste & store inside the dedicated SW 404 bin. 2. The 11 oil drums (SW409) were transferred to the Scheduled Waste store immediately. 		
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Inadequate training to the newly appointed Hospital Assistant (HA) and negligence caused by him. 2. Inadequate training and monitoring to workers on recyclable waste management. 		
Corrective Actions:	<ol style="list-style-type: none"> 1. Retrain the HA on SW management – clinical waste (SW 404). 2. Training conducted to Store keeper & management personnel that the oil drums are classified as Schedule waste (SW 409). Therefore it must be stored at SW store. <p>The above two actions to be monitored by the respective Assistant Managers, and checked during the Sustainability Internal Audit</p>		
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.		

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Non-conformity			
NCR Ref #	2165594-202202-N4	Date Issued	25/02/2022
Due Date	Next Annual Surveillance	Date of nonconformity Closure	"Open"
Clause & Category (Critical / Minor)	2.2.2 (Minor)		
Statement of Nonconformity:	Due diligence of contractors was not available.		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
Objective Evidence:	<u>Genting Sri Gading Estate:</u> Sampled one of the workers (I/C No.: 920224-01-66XX) of contractor, Low Lam Hoe found that no contribution of SOCSO was made as per Employees' Social Security Act 1969 (Act4).		
Corrections:	Briefed the contractor that SOCSO paid amount should be stated on the payslip as RM7.75. Updated payslip re-issued to the worker.		
Root Cause Analysis:	There is no monitoring/due diligence done by the estate management to ensure that these conditions are compiled by the contractors. <ul style="list-style-type: none"> - The contractor, Low Lam Hoe has paid the SOCSO contribution monthly without fail, but he missed to write it on the payslip. - <i>The total amount of EIS and SOCSO are RM6.20 and RM34.90 respectively. (Employee contribution for EIS and SOCSO - RM3.10 and RM7.75, Employer - RM3.10 and RM27.15) So, the total amount that should be stated on the payslip for SOCSO is - RM7.75.</i> 		
Corrective Actions:	Brief estate management team and contractors that SOCSO contribution (by employee) must be stated in the payslip, and that this element must be checked during periodic Due Diligence of 3 rd party contractors.		
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	Finding Reference: 2165594-202202-I1 Clause: 6.3.1 Genting Plantation Berhad has established internal policy titled "Social Policy" dated 14/09/2020 and stated in the policy the management will respect the rights of workers to join or form legal trade unions

	<p>of their own choosing and to bargain collectively. Base on the interview with NUPW representative, he mentioned registration for union membership is still minimal for all Genting Plantation estate.</p> <p>It can be further improved by the management to assist union to communicate benefit of joining union and registered union that available.</p>
OFI 2	<p>Finding Reference: 2165594-202202-I2</p> <p>Clause: 1.1.5</p> <p>List of stakeholders has been maintained by each operating unit and has been classified into 2 categories which are external and internal stakeholders. For internal stakeholders, listed such as contractor, grocery store, workers representative and supplier. While for external, it has been listed smallholders, NGOs, government bodies and local communities.</p> <p>It can be further improved for the management to verify either information of the stakeholder is still valid such as name, contact number and position of nominated persons.</p>
OFI 3	<p>Finding Reference: 2165594-202202-I3</p> <p>Clause: 6.2.2</p> <p>Sample of employment contract has been verified by auditor for each operating unit and there is evidence employment term and condition has been outlined in the employment contract. It can be further improved to include more details specifically on deduction such as Employee Provident Fund (EPF), electricity and water.</p>
OFI 4	<p>Finding Reference: 2165594-202202-I4</p> <p>Clause: 6.7.3</p> <p>Use of PPE could be further assessed its efficiency and/or suitability for following:</p> <ul style="list-style-type: none"> - Genting Tanah Merah Estate (GTME): The filter cartridge's paper of a sprayer found quite dirty compare to his work partner. He mentioned that the filter paper normally uses for up to 25 days before change with new unit. - Genting Tanah Merah Estate (GTME): The earplug worn by a mono-sprayer operator made him unable to hear clearly what the estate manager told him and caused a near-miss incident during the field visit. - Genting Kulai Besar (GKBE): The safety shoes stated in the HIRARC could be further defined to detail out the suitable type of Safety Shoes to be used by each operator in their respective operations.
OFI 5	<p>Finding Reference: 2165594-202202-I5</p> <p>Clause: 7.2.7</p> <ol style="list-style-type: none"> 1. Genting Tebong Estate (GTBE): Storage of petrol could be enhanced further in-line with best practices applied. 2. Genting Sungei Rayat Estate (GSRE): Storage of Class III organophosphate pesticide (Acephate) could be enhanced further in-line with best practices applied. 3. Genting Ayer Item Oil Mill – Storage of Grease, Paint Containers and Chlorine could be enhanced further in-line with best practices applied.
OFI 6	<p>Finding Reference: 2165594-202202-I6</p> <p>Clause: 7.7.5</p> <p>Replanting will be conducted on 2024 (field P99C - 33.84 Ha) in Sing Mah Div, Genting Sungei Rayat Estate.</p>

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	The latest Drainability assessment conducted on Jan 2021 prepared by Genting Plantation Research Centre. From the report conclusion and data, show that the replanting can proceed. However, the report could be further improved to contain 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.
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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 estate.
PF 4	Generally, well implementation of Good Agricultural Practices (GAP).

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1886372-202002-N1	Date Issued	20/02/2020
Due Date	25/01/2022	Date of nonconformity Closure	25/02/2022
Clause & Category (Critical / Minor)	6.7.4 (Minor)		
Statement of Nonconformity:	Found some workers inadequately covered by accident insurance.		
Requirement Reference:	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.		
Objective Evidence:	Sighted accident record JKPP 6 for Dedi Alpan (Socso id: 201900647671) dated 28 June 2019. The LTI for this cases shows 20 days however found the payment voucher (E1202870/2019) from SOCSO only cover 15 day. The salary from date 1 July 2019 until 5 July was not covered by the employer or SOCSO.		
Corrections:	To pay the 5 days salary (for period 1st – 5th Jul 2019) in the February 2020 salary.		
Root Cause Analysis:	The salary was not paid because the Medical Certificate (MC) issued by the Hospital was only for period 29th June to 5th July 2019		
Corrective Actions:	To ensure any hospitalize Sick Leave due to accident during working hours to be paid or covered under SOCSO in line with the reported Loss Time Injury (LTI).		
Assessment Conclusion:	<u>ASA 1 1 & ASA 1 2 Verification</u> All workers provided with medical care either via treatment through estate clinics or panel clinics from the nearby town. All costs incurred from work-related		

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	incidents leading to injury or sickness are covered via accident insurance coverage made through SOCSO contributions. Sighted records of monthly SOCSO contributions for the month of May, Aug and Nov 2021 made by all operating units via SOCSO 8A forms indicated no miss or late contributions of insurance for the workers. Hence the raised Minor Non-Conformity was closed on 25/02/2022.
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Opportunity for Improvement	
OFI#	Description
OFI 1	OFI Statement: Nil

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1740419-201902-M1	Major	6.1.3	15/02/2019	Closed on 24/04/2019
1740419-201902-M2	Major	2.1.1	15/02/2019	Closed on 24/04/2019
1740419-201902-N1	Minor	4.6.10	15/02/2019	Closed on 20/02/2020
1740419-201902-N2	Minor	2.1.3	15/02/2019	Closed on 20/02/2020
1886372-202002-M1	Critical	6.1.2	20/02/2020	Closed on 23/04/2020
1886372-202002-M2	Critical	6.2.2	20/02/2020	Closed on 23/04/2020
1886372-202002-M3	Critical	7.8.2	20/02/2020	Closed on 23/04/2020
1886372-202002-N1	Minor	6.7.4	20/02/2020	Closed on 25/02/2022
1886372-202002-N2	Minor	7.4.1	20/02/2020	Closed on 24/02/2021
2165594-202202-M1	Critical	6.2.4	25/02/2022	Closed on 20/05/2022
2165594-202202-M2	Critical	6.2.3	25/02/2022	Closed on 20/05/2022
2165594-202202-N1	Minor	3.4.2	25/02/2022	"Open"
2165594-202202-N2	Minor	6.7.2	25/02/2022	"Open"
2165594-202202-N3	Minor	7.3.2	25/02/2022	"Open"
2165594-202202-N4	Minor	2.2.2	25/02/2022	"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 Genting Ayer Item Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as 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)
Communities	Village Head - Kampung Baru	Phone interview
Internal Stakeholders	Workers Representatives	Face to face
Internal Stakeholders	Gender Committee	Face to face
Contractor	Kee & Mei Trading, FFB Transporter	Phone interview
Communities	Head of Kampung Orang Asli Air Dusun	Phone interview
Governmental Department	Jabatan Haiwan dan Veterinar	Phone interview
Local communities	Repah Division Temple	Phone interview
Contractor	Arumugam Andekan	Phone interview

Stakeholders comment	
1	<p>Feedbacks: <u>Ketua Kampung Kg. Baru</u> He informed that no land dispute were reported. Trenches were available to demarcate the boundaries. He informed that he has requested the management to assist on constructing a higher bund to prevent overflow of water from estate into the village during raining season. Other than that, he has no issue with the management and understands the complaint procedure.</p> <p>Audit Team verification and response: Reviewed the records of desilting work for flood mitigation works and seen the photo evident of the desilting work that has completed. Total around 2km desilting work has completed.</p>
2	<p>Feedbacks: <u>Workers' Representatives</u> They informed that they were elected by workers without any interference of management. They understand the complaint procedure and they are satisfied with the management. No issue reported by the workers. Any complaints related to the housing repair were carried out by the management. They understand the complaint procedure and their rights as workers.</p> <p>Audit Team verification and response: No other issue.</p>
3	<p>Feedbacks: <u>General Workers</u> The workers informed that they understood the employment contract signed by them. The management has explained to them the terms and conditions of the employment contract. There was no occurrence of</p>

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	<p>contract substitution. The job promised in their home countries is similar to what they have work in Malaysia. They also informed that they kept their passport in the locker inside their room. They only handover the passport to the management during renewal of permit. No discrimination and harassment reported as the management treated them equally. They were paid as per Minimum Wage Order 2020 and Employment Act 1955.</p> <p>Audit Team verification and response: No other issue.</p>
4	<p>Feedbacks: <u>Contractor – Kee & Mei Trading, FFB Transporter</u></p> <p>He informed that he has signed an agreement with the management on yearly basis and he understood the terms and conditions stipulated in the agreement. Payment was made promptly. He has good relationship with the management and understand the complaint procedure.</p> <p>Audit Team verification and response: No other issue.</p>
5	<p>Feedbacks: <u>Female workers</u></p> <p>They informed that no discrimination occurred in the company. All are treated equally and no harassment reported. One of the female workers has been promoted as Mandor based on the capability. They were paid as per Minimum Wage Order 2020 and Employment Act 1955. No sexual harassment and violence reported in the company.</p> <p>Audit Team verification and response: No other issue.</p>
6	<p>Feedbacks: <u>Puan Zurina, Jabatan Perkhidmatan Veterinar</u></p> <p>Puan Zurina is the PIC that in charge for any veterinary issues for Masjid Tanah district. As per respond, Jabatan Perkhidmatan Veterinar has been included as stakeholders since any issues related animal will be reported to her department. Previously, estates are using buffaloes as part of FFB evacuation but no longer been used. Good relationship has been established by both parties and Puan Zurina is aware with the procedure communication and consultation that has been established. There is no issues of veterinary has been raised from Genting Plantations Berhad</p> <p>Audit Team verification and response: No other issue.</p>
7	<p>Issues: <u>National Union Plantation Workers (NUPW)</u></p> <p>Mr Vannan has been interviewed and as per his respond, NUPW and Genting Plantation Berhad has maintained good relationship and communication has been done through appropriate channel. He also informs that participation in NUPW for Genting Plantations Berhad estates has improved compare to previous years. He appreciates effort of the management to communicate the importance to register as union member.</p> <p>Audit Team verification and response: Management of Genting Plantation Berhad noted with the comment and will further improved on the communication with the stakeholders.</p>
	<p>Issues:</p>

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8	<p><u>Contractor (Arumugam Andekan)</u></p> <p>All contractors provided services to Genting Plantations Berhad more than 5 years. As per interview, they understand legal compliance and prohibition use underage and force labour workers. It has been verified there is no issues of payment and payment has been done according to payment term.</p> <p>Management Responses:</p> <p>Estate management will monitor compliance of legal requirement for all contractor and update contractor for any new amendment. Current practice of payment method will be continued.</p>
9	<p>Issues:</p> <p><u>Mr Alam, Head of Kampung Orang Asli Air Dusun</u></p> <p>Interview with confirmed that good relationship has been established by the management with local communities surrounding the estates. There is no issues of land since clear identification has been made by both parties. It also has been confirmed that contribution has been made such as grass cutting, providing equipment for local communities' activities and others.</p> <p>Management Responses:</p> <p>Estate management will monitor any issues related to land will update local communities surrounding with appropriate channel.</p>
10	<p>Issues:</p> <p><u>Mr Rayakumar, representative from Repah Division Temple</u></p> <p>Mr Rayakumar is the representative from Repah Division Temple and he informed that previously he requested from the estate to recognize temple committee in order for them to get to receive fund from the government. Meeting has been conducted between both parties, however, action will be taken has not been responded and Mr Rayakumar is not aware what is the next step.</p> <p>Management Responses:</p> <p>As stated in the management plan, explanation to temple representative that the estate management only recognized the temple if the all the committee is estate workers. It has been confirmed that explanation has been done through interview with the temple representative</p> <p>The issues has been identified as closed, however, feedback from the temple representative show he is not included in the establishment of management plan and still trying to get recognition from the estate. Hence nonconformities has been raised.</p>
11	<p>Issues:</p> <p><u>Worker's Representative/Gender Committee</u></p> <p>Sample of local and foreign workers has been interviewed. As per interview, there is issues has been raised where policy and procedure has been communicated to all workers. Salary payment is in line with local regulations. All workers interviewed satisfied with accommodation provided by the company</p> <p>Management Responses: Management team will keep update on any update of legal requirement to ensure that all workers will be paid compliance with legal requirement.</p>

List of land owner / user contacted

Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions

Not Applicable as Genting Ayer Item Certification Unit have already undergone 2nd Cycle of Replanting.

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

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Genting Ayer Item Oil Mill and 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 Genting Ayer Item Oil Mill and Supply Base remain certified.

Report prepared by	Acceptance of Assessment Conclusion	Acceptance of Assessment Conclusion
Name: VIJAY KANNA PAKIRISAMY	Name: Arunan Kandasamy	Name: James Chung Khim Hon
Company Name: BSI SERVICES (M) SDN BHD	Company Name: Genting Plantations Berhad	Company Name: Genting Plantations Berhad
Title: CLIENT MANAGER	Title: Senior Vice President Plantation (Malaysia)	Title: Senior Vice President Group Processing
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 02/06/2022	Date: 09/06/2022	Date: 09/06/2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance
Principle 1: Behave ethically and transparently		
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p> <p>Genting Plantations Berhad has developed Procedures on Requests and Responses with Doc. No.: SMP-GPB-25, Rev. 0 dated 14/08/2014 to define the responsibilities to respond constructively and promptly to the information requested by stakeholders. As per the procedure, the list of documents which are publicly available as below:</p> <ul style="list-style-type: none"> • Company annual report • Group policies • Reports related to environment such as EIA, EAI • RSPO external audit reports • Pollution prevention plan • Continuous improvement plan • Complaints and grievances book and its procedure • Negotiation and compensation procedure • Sexual harassment procedure <p>Senior Manager of Genting Sri Gading Estate, Manager of the Mill and Manager of Genting Kulai Besar Estate has issued the list of documents that could be requested by the stakeholders to all the relevant stakeholders on 10/01/2022, 08/02/2022 an 20/12/2021 respectively. The stakeholders are required to register in Enquiry</p>	Complied

		<p>Register Book prior to access to the documents. The list of documents not limited to:</p> <ul style="list-style-type: none"> • Land title • Policies • Reports – EAI, SIA, HCV and audit reports • Management plans • Procedures <p>Seen the email correspondence that the management has sent a copy of the list to the relevant stakeholders such as local authorities, contractors and suppliers.</p>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>All the related information was in Bahasa Malaysia and English. The stakeholders could access to the documents upon request from the operating units.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>The estates and mill have implemented Enquiry Register Book to record any requests from the stakeholder. There was no request on information from stakeholder in the estates. The stakeholders mainly requested for assistance such as contribution or road access. Seen the records of Enquiry Register Book with the official requests from the stakeholders.</p> <p>There was a request on 22/11/2021 from the representative of Indian Temple for land title and permission letter from Genting Sri Gading Estate’s management to prove that the temple is approved to operate in the land. Seen the communication records from both parties.</p> <p>For mill, there was request a copy of mill’s MPOB license by the CPO buyer on 10/01/2022 and it has recorded in the Enquiry Register Book. The mill has sent a copy of the license on 12/01/2022 and email correspondence was sighted.</p>	Complied

<p>1.1.4</p>	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantation Berhad has developed Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 23/02/2018 for the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties. Meeting shall be carried out at least six monthly and annually for internal and external stakeholders. The topics to be discussed such as complaint & grievances, environmental and biodiversity concerns, social issue and suggestions for improvement. Interviewed with the stakeholders confirmed that the management has briefed them on the procedure.</p> <p>The Senior Assistant of Genting Sri Gading Estate, Production Executive of Genting Ayer Item Oil Mill and staff of Genting Kulai Besar Estate has been appointed as the Social and Risk Management Person in Charge to handle any issue related to social and risk management in the estate and mill. Appointment letter dated 17/12/2021, 29/01/2021 and 17/01/2022 was sighted respectively.</p> <p><u>Genting Sri Gading Estate:</u></p> <p>An internal stakeholder meeting was conducted on 16/12/2021 in Genting Sri Gading Estate with and contractors and neighbouring stakeholders. There was no issue raised during the meeting.</p> <p>Management of Genting Sri Gading Estate has sent a Stakeholder – Suggestion/ Complaints/ Feedback Form to external stakeholders to collect feedback or complaints on 18/12/2021. There was no feedback received from the stakeholders.</p> <p><u>Genting Ayer Item Oil Mill:</u></p> <p>The mill management has conducted internal stakeholder meeting on 08/12/2021 with the workers to discuss issues from the workers.</p>	<p>Complied</p>
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		<p>Meeting minutes was sighted and issues raised were recorded in the minutes. Besides, the issues raised were incorporated into the social management plan dated 10/02/2022 to identify the action to be taken and status of the issues.</p> <p>An invitation email for Stakeholder meeting to stakeholders was sent on 09/02/2022 to external stakeholders to collect feedbacks/ comments/ complaints from the stakeholders. There was no issue raised by the stakeholders.</p> <p><u>Genting Kulai Besar Estate:</u></p> <p>There was no stakeholder meeting carried out. The management has emailed an invitation email for Stakeholder meeting to stakeholders was sent on 20/12/2021 to internal and external stakeholders to collect feedbacks/ comments/ complaints from the stakeholders. There was no issue raised by the stakeholders.</p> <p><u>Genting Tanah Merah Estate</u></p> <p>Consultation and communication mechanism document number SMP-GPB-17 issuance date 23/02/2018. For Genting Tanah Merah Estate, the procedure has been communicated on 14/05/2021</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>List of Stakeholders was developed in Genting Sri Gading Estate on 10/12/2021, 30/11/20201 in Genting Ayer Item Oil Mill and 31/01/2022 in Genting Kulai Besar Estate. Nominated representatives with the contact details were clearly stated in the list. Stakeholders such as local communities, government authorities, neighbouring smallholders, workers' representatives, contractors and suppliers were included in the list.</p>	OFI

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		<p>List of stakeholders has been maintained by each operating unit and has been classified into 2 categories which are external and internal stakeholders. For internal stakeholders, listed such as contractor, grocery store, workers representative and supplier. While for external, it has been listed smallholders, NGOs, government bodies and local communities.</p> <p>It can be further improved for the management to verify either information of the stakeholder is still valid such as name, contact number and position of nominated persons. Hence, an OFI was raised.</p>	
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>Genting Plantations Berhad has established Code of Conduct and Ethics for all employees and directors of Genting Plantations Berhad dated 01/06/2020. This Code sets out the principles to guide standards of behaviour and business conduct when Employees deal with third party. Duties of good faith, diligence and integrity were explained in the Code. Training of the code of conduct was conducted on 14/10/2021 to the staffs in Genting Sri Gading Estate and 04/10/2021 in Genting Ayer Item Oil Mill. Besides, Genting Ayer Item Oil Mill has sent the procedure to all the services providers via email with acknowledgement of received. Seen the records of email that sent to the service providers.</p>	Complied
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>Internal audit for RSPO requirements is conducted annually to ensure the business practices is implemented. The last RSPO internal audit was conducted on 23 – 24/12/2021 in Genting Sri Gading Estate, 16 – 17/12/2021 in Genting Ayer Item POM and 13 – 15/12/2021 in Genting Kulai Besar Estate. Besides, Third Party Due Diligence Questionnaire was conducted on 29/06/2021 to the</p>	Complied

		contractors engaged by the estate to ensure code of ethical conduct practice in the estate.	
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>Genting Ayer Item Certification Unit is continues to ensure compliance towards all applicable local, national and ratified international laws and regulations. Among permit and license sampled were:</p> <p><u>Genting Ayer Item Oil Mill</u></p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 500056704000; License Validity Period: 01/02/2022 – 31/01/2023 2. DOE License (Compliance Schedule); License Number: 003866; License Validity Period: 01/07/2021 – 30/06/2022. 3. BOMBA Fire Certificate; Registration Number: 328466; Certificate Number: JBPM – JH/7/661/2021; License Validity Period: 14/12/2021 – 13/12-2022. 4. Energy License - Private Installation License; License Number: 2020/01203; Serial Number: 44051; License Validity Period: 12/06/2021 – 11/06/2022. 5. Controlled Items Storage Permit; Reference Number: PPDNKK/J/BP/BPK0069; Serial Number: PJ 001836; License Validity Period: 06/12/2021 – 05/12/2024. 6. SPAN License; Class License Number: SPAN/EKS/(PT)/800-4(1)/18/09; License Validity Period: 07/11/2019 – 06/11/2019. <p><u>Genting Seri Gading Estate</u></p>	Complied

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		<ol style="list-style-type: none"> 1. MPOB License (FFB); License Number: 524435102000; License Validity Period: 01/11/2021 – 31/10/2022. Estate Area: 60.46 Acres 2. MPOB License (FFB); License Number: 508592902000; License Validity Period: 01/05/2021 – 30/04/2022. Estate Area: 3542.98 Ha) 3. MPOB License (Nursery); License Number: 508842111000; License Validity Period: 01/07/2021 – 30/06/2022 4. Storage of Controlled Item (Barang Kawalan); Serial Number: P (J00412); Reference Number: (32) PPDNKK/J/BP/PBK 0013; Description: Diesel; Storage Capacity: 36000 Litres; License Validity Period: 28/03/2021 – 27/03/2024. 5. Storage of Controlled Item (Barang Kawalan); Serial Number: J005529; Reference Number: KPDNKK/J/BP 007/2016; Description: Petrol 95 With Subsidy; Storage Capacity: 100 Litres/ Day; License validity Period: 20/01/2022 – 19/01/2023. 6. Genting Sri Gading Estate has obtained approval from <i>Pejabat Tenaga Kerja</i> for deduction of wages as below: <ol style="list-style-type: none"> a. Ref. No.: Bil.(23)dIm.Buruh MB.7/2/35/9 SJ.114 dated 29/12/1987 for deduction of wages on electricity bill. b. Ref. No.: (2)dIm.JTK.BP/PMT/SEK.24/SR//0162 dated 31/12/20014 for deduction of wages on water bill. <p><u>Genting Kulai Besar Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License - FFB; License Number: 508591102000; License Validity Period: 01/05/2021 – 30/04/2022. 2. MPOB License – FFB (North Division); License Number: 508595302000; License Validity Period: 01/05/2021 – 30/04/2022. 	
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		<p>3. MPOB License – Nursery; License Number: 540060011000; License Validity Period: 01/06/2021 – 31/05/2022.</p> <p>4. Storage of Controlled Item (Barang Kawalan); Reference Number: KPDNKK.J-JB/26/5A/11/7(P/D)(P12); Serial Number: P J004122; Description: Diesel (10,000 Litres) & Petrol (400 Litres); License Validity Period: 02/09/2021 – 01/09/2024.</p> <p>5. Genting Kulai Besar Estate has obtained approval from <i>Jabatan Tenaga Kerja Negeri Johor</i> for deduction of wages as below:</p> <ul style="list-style-type: none"> - Ref. No.: TK (NJ) U-21 dated 21/08/2018 for deduction of wages on electricity bill for RM 15/ worker per month for single and RM 70/ worker per month for family. <p><u>Genting Tebong Estate</u></p> <p>1. MPOB license # 539822011000; Licensed activity: Produce, Sales and transport, Storage; Oil palm product: SLGBIJI #; Area: Lot # 980; Validity period: 1/6/2021 – 31/5/2022</p> <p>2. MPOB license # 501667602000; Licensed activity: Sales and transport; Oil palm product: FFB #; Area: 1607.32 ha; Validity period: 1/4/2022 – 31/3/2023</p> <p>3. MPOB license # 501803202000; Licensed activity: Sales and transport; Oil palm product: FFB #; Area: 697.99 ha; Validity period: 1/12/2021 – 30/11/2022</p> <p>4. Scheduled Control Goods Permit; Supply Control Regulations 1974; Serial # M000972; Ref. # SK(M)382/2003(D); Type & description: Diesel from licensed vendor; Storage quantity: 10,000.00 litres; Validity permit: 10/8/2021 – 9/8/2024</p>	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	The system to track changes in law is implemented through the head office Sustainability Team. They are responsible for tracking and ensuring that all legal requirements applicable to Operating	Complied

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	<p>- Minor compliance -</p>	<p>Units have been identified and for evaluating their potential impact on the company’s operations. They are guided by the Total Legal Register Document; Document Number: SP-MGR-03-F01-0; Revision: 01; Issue Date: 19/08/2019.</p> <p>Means of tracking and identifying include the respective authority website visits and direct communication with those agencies.</p> <p>Among the laws covered in the list were EQA, Employment Act, OSHA, FMA to name a few. The amendment/update of the list is done by Systems, Methods, Insurance and Risk Management Department (based in KL).</p>																									
<p>2.1.3</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>The estates have installed boundary markers/trenches/signage as sighted during the visit to the fields. This confirmed that they have visibly maintained and demarcated the boundary markers via installing the red/white pole and signage.</p> <table border="1" data-bbox="1137 858 1930 1283"> <thead> <tr> <th>Estate</th> <th>Location</th> <th>Boundary Neighbours</th> </tr> </thead> <tbody> <tr> <td>GPB Sri Gading</td> <td>P99B/04B</td> <td>Kg Rahmat</td> </tr> <tr> <td>GPB Sri Gading</td> <td>P2018B</td> <td>Hutan Bkt Soga</td> </tr> <tr> <td>GPB Sri Gading</td> <td>P19C/21E</td> <td>Smallholder</td> </tr> <tr> <td>GPB Kulai Besar</td> <td>P14B</td> <td>Kg Bkt Batu Batu 35</td> </tr> <tr> <td>GPB Kulai Besar</td> <td>P07C</td> <td>Kg Muhibbah</td> </tr> <tr> <td>GPB Kulai Besar</td> <td>P09A</td> <td>Gunung Pulai Reserve</td> </tr> <tr> <td>GPB Tebong</td> <td>OP96SK</td> <td>Ayer Pesom (Orang Asli Village)</td> </tr> </tbody> </table>	Estate	Location	Boundary Neighbours	GPB Sri Gading	P99B/04B	Kg Rahmat	GPB Sri Gading	P2018B	Hutan Bkt Soga	GPB Sri Gading	P19C/21E	Smallholder	GPB Kulai Besar	P14B	Kg Bkt Batu Batu 35	GPB Kulai Besar	P07C	Kg Muhibbah	GPB Kulai Besar	P09A	Gunung Pulai Reserve	GPB Tebong	OP96SK	Ayer Pesom (Orang Asli Village)	<p>Complied</p>
Estate	Location	Boundary Neighbours																									
GPB Sri Gading	P99B/04B	Kg Rahmat																									
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GPB Tebong	OP96SK	Ayer Pesom (Orang Asli Village)																									
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>																											

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<p>2.2.1</p>	<p>A list of contracted parties is maintained. - Minor compliance -</p>	<p>List of contractors for activities in the estate is available and last updated on 10/12/2021 in Genting Sri Gading Estate, 30/11/2021 in Genting Ayer Item Oil Mill and 31/01/2022 Genting Kulai Besar Estate. Agreement with the contractors was maintained.</p> <p>For Genting Tebong Estate, there are two contractors appointed for loading and transporting of Fresh Fruit Bunches (FFB) and loose fruits which are Ash Ashok Enterprise and Arumugan s/o Adekan.</p> <p>Genting Sungei Rakyat Estate, sample has been taken as per below</p> <ul style="list-style-type: none"> i. GJS Agrotech Enterprise ii. SRGD Enterprise 	<p>Complied</p>
<p>2.2.2</p>	<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. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -</p>	<p>Sampled the agreements as below:</p> <ul style="list-style-type: none"> i. Agreement No.: GSGE/HA/22/01/01 for harvesting work which valid until 31/12/2022. ii. Agreement No.: GSGE/HA/22/01/03 for harvesting work which valid until 31/12/2022. iii. Agreement No.: GSGE/HA/22/01/04 for harvesting work which valid until 31/12/2022. iv. Contractor: Teo Tuan Kwee Sdn Bhd for transporting CPO which valid until 30/10/2022. v. Contractor: Makmur Transport Sdn Bhd for transporting CPO which valid until 28/02/2023. vi. Agreement No.: GKBE/HAR/ABS/001(22) for harvesting work which valid until 31/12/2022. vii. Agreement No.: GKBE/CFT/001(22) for transporting FFB which valid until 31/12/2022. <p>The agreement has clearly stated that the contractors need to comply with legal requirements.</p>	<p>Non-compliance</p>

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		<p><u>Genting Sri Gading Estate:</u> Sampled one of the workers (I/C No.: 920224-01-66XX) of contractor, Low Lam Hoe found that no contribution of SOCSO was made as per Employees’ Social Security Act 1969 (Act4). Hence, a minor nonconformity was raised.</p> <p><u>Genting Kulai Besar Estate:</u> There are two sub-contractors as lorry drivers engaged by the main contractor, Chip Fong Trading. Seen the agreements signed by the sub-contractors which expire date is December 2022. The sampled of agreements as below:</p> <ul style="list-style-type: none"> i. I/C No.: 610428-01-57XX ii. I/C No.: 870317-01-54XX <p><u>Genting Tebung Estate</u> Contract agreement of 3 contractors has been verified for Arumugam s/o Andekan contract number GTBE/TD/GW/21/01/06AA. GJS Agrotech Enterprise and SRGD Enterprise. Stated in the contract agreement that contractors need to submit workers’ pay slips one week after the pay slips issuance.</p>	
<p>2.2.3</p>	<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. - Minor compliance -</p>	<p>Refer to the agreements above, a specific clause under Clause 4 for CPO transporter and Clause 2, D (i) for other service provider mentioned the contractor shall ensure no minor (below 18 years old) are employed. Interviewed with the contractor and reviewed the list of contract workers confirmed that no child labour in the estate.</p>	<p>Complied</p>
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			

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2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>The Genting Ayer Item Oil Mill is an Identity Preserved Mill. The Mill processes only FFB from its own supply base estates namely Genting Sri Gading Estate, Genting Tanah Merah Estate, Genting Kulai Besar Estate, Genting Sungei Rayat Estate and Genting Tebong Estate. All these estates have clear origins, evidence of ownership status and valid MPOB licenses.</p>	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>The Genting Ayer Item Oil Mill is an Identity Preserved Mill (Certificate Number RSPO 653474) and therefore does not source FFB indirectly through collection centers, agents or other intermediaries. Therefore, this Indicator is not applicable.</p>	Not Applicable
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			

<p>3.1.1</p>	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -</p>	<p>GPB Ayer Item POM and supply base have established and implemented its commitment to a long term sustainability and financial viability through an operating expenditure /capital expenditure planning. The mill has a budget for financial year Jan - Dec comprises among others the following components;</p> <ol style="list-style-type: none"> 1. Crop processed with anticipated extraction ratios including a 5-year forecast. 2. Cost components include the following <ol style="list-style-type: none"> a. General charges statement <ul style="list-style-type: none"> - General charges - Cost of supervision/Cost of labour - Cost of other - Cost of RSPO/MSPO & Other Management system b. Capital expenditure statement <ul style="list-style-type: none"> - Building, utilities, welfare - Plant & machinery - Office equipment - Furniture & fittings - Electrical installation c. Plant /Mill inclusive of processing /dispatch cost <p>The five years planning horizon 2022-2026 is available for verification.</p> <p>Similarly, the estates possessed a similar budget format. Inclusive is a 5-year budget/forecast financial plan 2022-2026 allocating categories among others;</p> <ol style="list-style-type: none"> 1. Crop yielding area 	<p>Complied</p>
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- 2. Mature cost
- 3. General charges/upkeep/collection/depreciation
- 4. Cost/ha & cost /mt FFB
- 5. CAPEX

Separately the cost of immature areas is also shown which among others comprises of the following items;

- 1. Labour statement / Allocation of wages / Labour benefit summary
- 2. Yield statement oil palm
- 3. Summary of vehicle and running schedule / Job allocation for vehicles
- 4. Summary of workshop running schedule
- 5. Summary of budget
- 6. Summary of general charges
- 7. CAPEX

The main key areas of the financial projections are as follows. Certain figures were excluded for reason of confidentiality.

Estates	2022	2023	2024	2025	2026
Mature Ha	x	x	x	x	x
Immature Ha	x	x	x	x	x
Total Planted Ha	x	x	x	x	x
FFB Tons	x	x	x	x	x
Yield /Ha	x	x	x	x	x

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RM/mt FFB		x	x	x	x	x
GAI POM						
GAI POM		2022	2023	2024	2025	2026
Unit Cost RM/CPO		x	x	x	x	x
Operating Cost		x	x	x	x	x
Operating Cost		x	x	x	x	x
Total Gen Charges		x	x	x	x	x
Grand total		x	x	x	x	x
FFB (mt)		187K	207K	212K	212K	216K
OER %		21.00	21.20	21.30	21.50	21.50
KER %		5.20	5.20	5.35	5.40	5.45
Utilization		80%	80%	80%	80%	80%
MPOB has issued license of 211200 FFB mt/year at processing capacity of 60 mt/hour.						
Estate		2022	2023	2024	2025	2026
GSGE	FFB/mt	65035	62440	68020	70631	73729
GSRE	YPH	23.09	23.00	23.50	24.00	24.00
GKBE	FFB/mt	40778	44445	47342	47333	46500
GKBE	YPH	26.0	27.0	28.0	28.0	28.0

<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -</p>	<p>Replanting programmes were available at all the visited estates The programmes projected for 5 years. All replanting program and planning in all the Group Estates are monitored by the Head Office. Assistance and visits are performed by SVP/GM for the approval of hectares and stand per ha.</p> <table border="1" data-bbox="1137 539 1935 836"> <thead> <tr> <th>Year</th> <th>GKBE</th> <th>GSRE</th> <th>GTBE</th> <th>GTME</th> <th>GSGE</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>153.72</td> <td>76.27</td> <td>221.47</td> <td>129.87</td> <td>168.80</td> </tr> <tr> <td>2023</td> <td>109.81</td> <td>126.59</td> <td>310.40</td> <td>174.5</td> <td>160.26</td> </tr> <tr> <td>2024</td> <td>119.34</td> <td>90.93</td> <td>197.93</td> <td>138.42</td> <td>187.65</td> </tr> <tr> <td>2025</td> <td>70.62</td> <td>108.78</td> <td>144.98</td> <td>57.58</td> <td>169.56</td> </tr> <tr> <td>2026</td> <td>94.94</td> <td>-</td> <td>140.41</td> <td>-</td> <td>-</td> </tr> </tbody> </table>	Year	GKBE	GSRE	GTBE	GTME	GSGE	2022	153.72	76.27	221.47	129.87	168.80	2023	109.81	126.59	310.40	174.5	160.26	2024	119.34	90.93	197.93	138.42	187.65	2025	70.62	108.78	144.98	57.58	169.56	2026	94.94	-	140.41	-	-	<p>Complied</p>
Year	GKBE	GSRE	GTBE	GTME	GSGE																																		
2022	153.72	76.27	221.47	129.87	168.80																																		
2023	109.81	126.59	310.40	174.5	160.26																																		
2024	119.34	90.93	197.93	138.42	187.65																																		
2025	70.62	108.78	144.98	57.58	169.56																																		
2026	94.94	-	140.41	-	-																																		
<p>3.1.3</p>	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -</p>	<p>The Management conducted the Management Review Meeting on annually basis. The recent meeting were conducted on on-line mode on entire region basis in view of the MCO concerns. The agenda among others discussed in the MRM were;</p> <ul style="list-style-type: none"> a. RSPO/MSPO Audit schedule and certification status b. Changes/improvement on sustainability management system / results on internal audit c. Complaints and grievances d. Enquiry register/ Compliance to legal requirements e. Stakeholder meeting/minutes f. Greenhouse gas g. Continual improvement and recommendations h. Resource training requirements i. Sustainability policies j. Supply chain and traceability 	<p>Complied</p>																																				

		Reviewed the latest Management Review Meeting (Southern Region) Genting Plantation Berhad dated 14/01/2022.	
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.			
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>Both the estates and the mill had established management plan for the continuous improvement among others as described below compiled based on the social and environmental concerns.</p> <p>1. <u>Reduction in use of pesticides</u></p> <p>The estate adopted several continuous improvements in reducing of pesticides i.e. increasing planting of beneficial plants mainly <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i>.</p> <ul style="list-style-type: none"> - The estate also adopted planting of <i>Leguminious</i> Cover Crop mainly <i>Pueraria Javanica</i> and <i>Calopogonium Mucunoides</i> at replanting area to minimize circle and selective weeding. - Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced encouraging soft grasses in inter row and frond stacking area. - Mills wastes such as EFB were used as fertilizer in the selected fields where the application is economically viable. <p>2. <u>Environmental impacts</u></p> <p>Environmental impact assessment, management action plans and continuous improvement plan for the estate has been updated and monitored by management. Among others the improvement actions:</p>	Complied

		<ul style="list-style-type: none"> - Construction of sump at chemical and workshop to prevent ground or water contamination. - Collect back chemicals bags and allocate store for control of misused. - use of tray for tractor parking to prevent ground contamination <p>3. <u>Waste reduction</u> The management had planned to reduce emission by daily inspection and monitoring for their farm tractors / lorries to prevent any leakage and problem which can impact on smoke emission.</p> <p>4. <u>Pollution and greenhouse gas (GHG) emissions</u> The management of the estate had plan to reduce emission by daily inspection and monitoring for their farm tractors/ lorries to prevent any leakage and problem which can impact on smoke emission</p> <p>5. <u>Optimising the yield of the supply base.</u> The yield performance has always been the top priority in ensuring long-term economic and financial viability. In general, various efforts to optimise the yield of the plantation among others</p> <ul style="list-style-type: none"> - maximizing crop recovery, - optimum ripeness standard (harvest ripe bunches only and 100% loose fruit collection), - the soil fertility were maintained and planting only high yielding planting material 	
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		<p>Others improvement and enhancement program as shown below;</p> <table border="1"> <thead> <tr> <th>OU</th> <th>Section</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>SGE</td> <td>Social</td> <td>Multi-Purpose Hall 2024 RM 50K</td> </tr> <tr> <td>SGE</td> <td>Social</td> <td>Upgrading workers quarters 4 years RM40K</td> </tr> <tr> <td>SGE</td> <td>Operation</td> <td>New tractors /machine RM450K - 4 years</td> </tr> <tr> <td>SGE</td> <td>Operation</td> <td>Road upgrading 2000 ch RM600k 4 years</td> </tr> <tr> <td>KBE</td> <td>Social</td> <td>Roofing replacement RM135K- 2022</td> </tr> <tr> <td>KBE</td> <td>Social</td> <td>Tiling kitchen/toilet worker quarters RM80K</td> </tr> <tr> <td>KBE</td> <td>Environmental</td> <td>Septic tank upgrading - RM100K - 2023</td> </tr> <tr> <td>KBE</td> <td>Operation</td> <td>New workshop - RM80K - 2023</td> </tr> <tr> <td>KBE</td> <td>Operation</td> <td>Road roller RM150K - 2023</td> </tr> <tr> <td>KBE</td> <td>Operation</td> <td>Water irrigation WPH RM200K - 2024</td> </tr> </tbody> </table> <p><u>Genting Ayer Item Oil Mill</u> The mill had the following projects in the forthcoming 5 years in the CAPEX as part of the process continuous plan.</p> <table border="1"> <thead> <tr> <th>Section</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Environmental</td> <td>Installation of Biogas 2022 RM6M Phase 1</td> </tr> <tr> <td>Environmental</td> <td>Installation of Biogas 2023 RM6M Phase 2</td> </tr> </tbody> </table>	OU	Section	Details	SGE	Social	Multi-Purpose Hall 2024 RM 50K	SGE	Social	Upgrading workers quarters 4 years RM40K	SGE	Operation	New tractors /machine RM450K - 4 years	SGE	Operation	Road upgrading 2000 ch RM600k 4 years	KBE	Social	Roofing replacement RM135K- 2022	KBE	Social	Tiling kitchen/toilet worker quarters RM80K	KBE	Environmental	Septic tank upgrading - RM100K - 2023	KBE	Operation	New workshop - RM80K - 2023	KBE	Operation	Road roller RM150K - 2023	KBE	Operation	Water irrigation WPH RM200K - 2024	Section	Details	Environmental	Installation of Biogas 2022 RM6M Phase 1	Environmental	Installation of Biogas 2023 RM6M Phase 2	
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3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>RSPO metric template version 2.1 is used for the reporting of Genting Ayer Item 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 January to December 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								
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>											

<p>3.3.1</p>	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -</p>	<p>Genting Ayer Item Oil Mill has documented and maintained its own operational procedure covering all work stations from FFB Reception to CPO Dispatch and its supporting functions such as Laboratory, Workshop and Weighbridge.</p> <p>It is a three tier documentation level: Procedure Manual, System Procedure, Standard Operating Manual, Safe Operating Procedure and Environmental Control Procedure.</p> <p>On the estates front, three sets of manual had been developed and used daily in their operations, namely:</p> <ul style="list-style-type: none"> - Sustainability Management Procedure Manual enumerating 32 topics, latest update on 11/02/2019. - OSH Manual covers accident notification, PPE, health and safety programme, Emergency Response Plan, safety signage, OSH committee, HIRARC, and - Oil Palm Manual consisting of SOP describing activities at estate, example: <ol style="list-style-type: none"> 1. OPM 1: Land clearing, preparation, planting and legume covers establishment 2. OPM 2: Oil palm nursery practices 3. OPM 3: Planting density and planting technique 4. OPM 4: Soil conservation and terracing 5. OPM 5: Pest and disease 6. OPM 6: Weeding-weed management 7. OPM 7: Manuring of oil palm 8. OPM11: Harvesting 9. OPM 13: Managing difficult soils 	<p>Complied</p>
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<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>The mechanism to check consistent implementation for all activities carried out in the estate was through internal audit. Verified the internal audit report at mill and estate visited as follows:</p> <ol style="list-style-type: none"> 1. Genting Ayer Item Oil Mill on 16 – 17/12/2021 2. Genting Sri Gading Estate on 23 – 24/12/2021 3. Genting Kulai Besar Estate on 13 – 15/12/2021 <p>Additionally, Assistant Managers and Mill/Field Supervisors of the respective Operating Unit during their mill or field rounds do ensure Safe Work Practices and Standard Operating Procedures are followed.</p>	<p>Complied</p>
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available. - Minor Compliance -</p>	<p>Records of monitoring all compliance were maintained and available for verification in the mill and estate. Sampled records of monitoring relevant to occupational safety and health maintained and available as per samples as following:</p> <ol style="list-style-type: none"> 1. GTME Baseline Noise Risk Assessment; Report ref. # ACL/SHM-20210031 by Amirul Hakim bin Omar; Allied Chemists; DOSH Reg. # HQ/16/PEB/00/155; Monitoring date: 9/4/2021; Report date: 15/5/2021 2. GTBE Baseline Noise Risk Assessment; Report ref. # ACL/SHM-20210030 by Amirul Hakim bin Omar; Allied Chemists; DOSH Reg. # HQ/16/PEB/00/155; Monitoring date: 8/4/2021; Report date: 18/5/2021 3. GSRE Hearing Conservation Programme 2022; Report ref. code: AUDIO 2022/Genting Sungei Rayat Estate/Audio-Feb 2022 by Occupational Health Services RZ Intan Medicare Sdn. Bhd. 	<p>Complied</p>

		4. GSRE Medical Surveillance 2022 by Dr. Hussain Bin Moiz; DOSH OHD # HQ/17/DOC/00/00005; Date: 10/2/2022	
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There was a Social Impact Assessment (SIA) conducted on October & November 2019 for Genting Sri Gading Estate, 16 – 17/01/2019 for Genting Ayer Item Oil Mill and 23 – 28/01/2019 for Genting Kulai Besar Estate by Sustainability Department. The methodology of the assessment was through consultation with stakeholders and reviewed documents. Stakeholders such as local communities, school’s representative, contractors, local authorities, smallholders and workers were involved in the assessment. Seen the report dated 28/01/2020, 28/01/2019 and 07/02/2019 respectively.</p> <p>There were no new planting in both the estates. This is verified through the following document/facts.</p> <ul style="list-style-type: none"> a) Hectare statement compared to the previous year. b) Interviews with the management c) Field visits and verification. <p>The assessment of both the above was made in Social/Environmental Improvement and Management Plan 2022 (Pelan Pengurusan (Management Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang/Kilang) among others aimed;</p> <ul style="list-style-type: none"> a) To assess current condition based on identified potential aspects b) To verify presence of protected & conservation areas that could be significantly affected. 	Complied

		<p>c) To assess the social & environmental impact on the affected areas/stakeholders arising from the estate/mill activities.to reduce and control the pollution (negative impacts) and action plan to sustain the environmental impact (positive) has been developed with details in EIA assessment form ref no SP-MGR-02-F01-00 dated latest review 18/02/2022.</p> <p>d) To comply with various sustainability certification schemes</p> <p>The activities involved discussion with the estate management, sighting the documentation, observation on sites and surrounding, and interview with stakeholders adjacent to the conversion areas. The assessment covered the aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control. All the above documents were updated accordingly respectively in Jan 2022. These content are reviewed annually for any revision and updates .</p> <p>The Social/Environmental Management Plan (Pelan Pengurusan (Management Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang/Kilang) for 2022 produced among others includes the following;</p> <ul style="list-style-type: none"> a) Organization information b) Scope of assessment & team c) Methodology assessment timeline, approach and parameters d) SEAI matrix and findings. <p>All sites and the reports were visited and sighted respectively by the auditors in presence of the SD, Regional SHO estates and mill personnel.</p>	
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<p>3.4.2</p>	<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>Social and Environmental Management and Monitoring Plan of Genting Sri Gading Estate last updated on 24/01/2022, 10/02/2022 in Genting Ayer Item Oil Mill and 24/01/2022 in Genting Kulai Besar Estate was sighted with participation from stakeholders. Action to be taken, status, person-in-charge and monitoring technique was outlined in the management plan.</p> <p>Social impact assessment management plan for Genting Tebong Estate for issues raised during the assessment has been established and updated on 04/01/2021 and has been done with participation of stakeholders.</p> <p>Among samples of issues stated is from the temple that has requested to recognize the committee, for them to receive funds from the government. As stated in the management plan, explanation was made to temple representative, that the estate management only recognized the temple if all the committee members are estate workers. It has been confirmed that explanation has been done through interview with the temple representatives.</p> <p>The issues have been identified as closed, however, feedback from the temple representative shows that he was not included in the establishment of the management plan and he is still trying to get recognition from the estate. Hence, a Minor Nonconformity was raised.</p> <p>The Social/Environmental Improvement and Management Plan (Pelan Pengurusan (Management Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang/Kilang) for period 2022 is available for the CU. The plan among others incorporated the objectives, category, action, frequency, person in charge and monitoring period. Among others issues as extracted below:</p>	<p>Non-compliance</p>
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		<ul style="list-style-type: none"> a) To ensure compliance to SOP and legal requirement regarding social (appointment of person in charge/committee to handle social matters, communication on policies/SOP on social to relevant stakeholders, monitoring of pay and agreement of workers and contractor’s workers and to maintain housing and facilities provided to workers). b) To contribute to local communities development c) Community and employee alert on the present pandemic Covid -19 d) PPE issuance and compliance for employees e) Domestic waste disposal f) Enhance understanding on safety guidelines in mill. g) Health awareness among employees. h) Audiometric test awareness among employees. <p>The aspect and impact analysis for all the mill/estate operations are documented on Jan 2022 and revised annually. In the comprehensive report, the study of aspect and impact are aimed to;</p> <ul style="list-style-type: none"> a) Plan to avoid negative impact and to promote positive impacts. b) Reduction disposal of waste taking into consideration of social responsibilities. c) Plan to reduce pollution and release of GHG d) Development and implementations. <p>The aspect and impact covered the following activities/operations among others;</p>	
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3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>Generic social management plan has been established and updated on 01/02/2022 and documented in the document title social management and monitoring plan of Genting Tebong Estate and on 12/02/2022 for Genting Tanah Merah Estate. Stated in the management that social impact assessment need to be done at least once in 2 years and appropriate actions shall be taken for the issues raised for internal and external issues raised in timely manner and documented. Sighted also the progress of</p>	Complied																																																								

		<p>management plan implementation has been monitored by the estate management in the status column</p> <p>Social Management and Monitoring Plan was reviewed on yearly basis. Sampled the issues as below:</p> <ul style="list-style-type: none"> a. Issue: No transport for new worker. Action: To provide bicycle for each of the new workers. Status: Seen the invoice of purchase of bicycle for new foreign worker and photo evident of bicycle provided to the new worker. b. Issue: To install SAJ water in the housing area in mill. Action: To install by Q3 2021 replacing current own water treatment. Status: Seen the CAPEX Y2022 where total RM 150,000 was allocated to install the SAJ water. The management has engaged contractor for consultancy service on the installation of water piping on 06/12/2021 and submitted the required documents to the consultant for further application to SAJ. The progress of application is still in process. Therefore, the issue was brought forward to the management plan Y2022. This will be verified during next assessment. 	
<p>Criterion 3.5: A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>Genting Plantations Berhad has developed Foreign Workers Recruitment Procedure (Doc. No.: GEN-13, Rev. 02 dated 09/11/2020) to establish control procedures on the employment of foreign workers. Recruitment, selection and termination/retirements process was clearly outlined in the procedure.</p>	<p>Complied</p>

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		<p>Local Recruitment Procedure was established as well in the company. Besides, criteria for promotion was outlined in Procedures for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021).</p> <p>Procedure Manual of Manpower Recruitment and Orientation; Doc. # PM-MR-02; Rev. 00; Issue date: 2/1/2018 for recruitment, selection, hiring, promotion, retirement and termination and made available to the workers.</p>	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>For employment of foreign workers, this will be handling through Human Resource Department in HQ. There was no recruitment of foreign workers since last audit.</p> <p>The employment of local workers was through advertisement and word of mouth. They published the banner/ signboard of vacancy at the main road of the entrance in Genting Sri Gading Estate and Genting Ayer Item Oil Mill. Besides, the management also informed workers/ staffs/ head of local communities if there is any vacancy available. Seen the sample of job vacancy advertisement. Criteria and benefits were stated in the banner. Reviewed the records of employment such as application for employment, interview form, employment letter, pre-employment medical check-up and copied of identification card was available.</p>	Complied
<p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Ayer Item Operating Units have conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment covers all main operations and support operations.</p> <p><u>Genting Ayer Item Oil Mill</u></p>	Complied

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		<ol style="list-style-type: none"> 1. HIRARC was available in the Doc Number: SP-MGR-01-F01-0; Revision: 02; Issue Date: 18/02/2022. HIRARC was used to assess all risks identified in the mill and implement its recommended control measures. Among the HIRARC available are Weighbridge, FFB Loading Ramp, Empty Bunch Hopper, Sludge Pit and Water Treatment Plant. 2. Chemical Health Risk Assessment has been conducted for the mill in July 2018 by QMSPRO Sdn Bhd. The CHRA Report (Report Number: JKPP HIE 127/171-2(154)-2018/025) was available for verification. Supplementary Chemical Health Risk Assessment were done on November 2021 due to changes in chemicals used in the mill. The Supplementary CHRA Report (Report Number: JKPP HQ/12/ASS/00/309-2021/003) was provided by the assessor, QMSPRO Sdn Bhd and available for verification. 3. Medical Surveillance Programme has been conducted for mill workers deemed to be exposed to hazardous chemicals and fumes. The medical surveillance was conducted at Poliklinik Intan in December 2021 for a total of 30 workers. The Medical Surveillance Program Report (Report Number: MS 2021/Genting Oil Mill Sdn Bhd/MS-Dec 2021) indicated that none of the workers experienced health symptoms as a result of exposure to hazardous chemicals and their biological effects were normal. 4. Noise Risk Assessment was conducted in the mill in compliance to the Occupational Safety and Health (Noise Exposure) Regulations 2019. The NRA was conducted by Eurofins NM Laboratory Sdn Bhd on 26 – 29 January 2021. The NRA report (Report Number: NRA(J)/21-01/02) was available for verification. 	
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		<p>5. Hearing Conservation Programme 2021 has been conducted for mill workers deemed to be exposed to excessive noise. The audiometric test was conducted at Poliklinik Intan between Oct 2021 and Dec 2021 for 34 mill workers. The report (Report Reference Number: Audio 2021/ Genting Oil Mill Sdn Bhd/Audio-Baseline & Annual Oct-Nov 21) was available for verification.</p> <p><u>Genting Sri Gading Estate</u></p> <ol style="list-style-type: none"> 1. The estate have established HIRARC to identify all risks related to all operations in the estate and establish the necessary risk controls to minimises the risks and hazards. Sighted the HIRARC for operations last updated on 18/02/2022. 2. Chemical Health Risk Assessment has been conducted for the estate has been conducted in June 2017 by QMSPRO Sdn Bhd. The CHRA Report (Report Number: JKPP HIE 127/171(154)-2017/008) was available for verification. Supplementary Chemical Health Risk Assessment (CHRA) has been conducted for the estate due to changes in operations and chemicals used, on February 2020 by QMSPRO Sdn Bhd. The Supplementary CHRA Report (Report Number: JKPP/HQ/03/ASS/00/154-2020/025) was available for verification. 3. Baseline Noise Risk Assessment has been conducted at the estate by Allied Chemist Laboratory Sdn Bhd on 27/04/2021. The NRA Report (Report Number: ACL/SHM/20210036) was available for verification. 4. Baseline Audiometric Test have been conducted for 20 workers in the estate on 10/02/2022 at Poliklinik Kluang. The results has not been provided by the clinic as of yet. 	
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		<p><u>Genting Kulai Besar Estate</u></p> <ol style="list-style-type: none"> 1. HIRARC was available to address all risk and hazards related to all operations used in the estate. The HIRARC is reviewed whenever there are any accidents or incident and introduction of new operations in the estate. Latest review if HIRARC was conducted on 22/01/2022. 2. CHRA has been conducted in the estate in compliance with USECHH Regulation 2000. The assessment was conducted by QMSPRO Sdn Bhd on June 2017. The CHRA Report (Report Number (JKKP HIE 127/171-2(154)-2017/005) was available for verification. Supplementary CHRA Assessment have been conducted in the estate in February 2020 and February 2021 due to changes in chemical used. The assessment was conducted by QMSPRO Sdn Bhd and the reports (Report Number: JKKP HQ/03/ASS/00/154-2020/016 & JKKP HQ/03/ASS/00/154-2021/036) was available for verification. 3. Baseline Noise Risk Assessment has been conducted at the estate by Alied Chemist Laboratory Sdn Bhd on 26/04/2021. The NRA Report (Report Number: ACL/SHM/20210035) was available for verification. 4. Baseline Audiometric Test was conducted fon28/12/2021 for 8 employees at BP Healthcare Group Sdn Bhd and report available for verification. 	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>Annual Health and Safety plan established by each Operating Unit are mostly implemented through Annual Training Program 2021/2022 to address the identified health and safety risks. The emphasis is on safe work by providing</p>	Complied

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		<ul style="list-style-type: none"> ▪ Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk. ▪ Awareness and understanding of workplace hazards and how to identify, report, and control them. ▪ Specialized training, when their work involves unique hazards. <p>Besides formal classroom training other means include on-the-job training and worksite demonstrations to effectively convey safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.</p> <p>The safety performance of each Operating Unit is monitored via:</p> <ul style="list-style-type: none"> • Internal Audit conducted by the Genting Sustainability Department; • Workplace inspection by site OSH Committee; • Direct involvement of supervisor and rounds by Manager/Asst Manager/Supervisors; • Safety occurrence reporting; • Health / medical surveillance; • Chemical exposure monitoring, and • Audiometric test <p>The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken.</p>	
<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</p>	<p>No scheme small holder in Genting Air Item Oil Mill and supply base. All employees and contractors were provided training related to their job skills, RSPO requirements, Occupational Health &</p>	Complied

	<p>aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>Safety and Environmental matters. They training program include productivity and best management practice subjects by growers and miller. Specific to estates the examples include felling of oil palm trees, nursery, replanting, harvesting and upkeep of fields to evacuation of FFB to mill. Likewise, at the mill it covers from FFB receipt, grading, processing to Crude Palm Oil, storage and dispatch of CPO, nut kernel and the management of by-products, wastes and waste streams.</p>																					
<p>3.7.2</p>	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Training records are maintained by each Operating Unit. Sample some records at each Operating as follows:</p> <p>Genting Ayer Item Oil Mill</p> <table border="1" data-bbox="1153 810 1926 1337"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Hearing Conservation</td> <td>05/01/2021</td> </tr> <tr> <td>Work At Height Training</td> <td>24/01/2021</td> </tr> <tr> <td>Departmental Policies & Objective Training</td> <td>01/03/2021</td> </tr> <tr> <td>Lab & Chemical Handling Training</td> <td>16/04/2021</td> </tr> <tr> <td>Vehicle and Tractor Driver Training</td> <td>29/06/2021</td> </tr> <tr> <td>Covid-19 Response Plan Training</td> <td>25/09/2021</td> </tr> <tr> <td>Sustainability Awareness</td> <td>01/10/2021</td> </tr> <tr> <td>Antibribery & Corruption Awareness</td> <td>04/10/2021</td> </tr> <tr> <td>Scheduled Waste Management Training</td> <td>19/11/2021</td> </tr> </tbody> </table>	Training	Date	Hearing Conservation	05/01/2021	Work At Height Training	24/01/2021	Departmental Policies & Objective Training	01/03/2021	Lab & Chemical Handling Training	16/04/2021	Vehicle and Tractor Driver Training	29/06/2021	Covid-19 Response Plan Training	25/09/2021	Sustainability Awareness	01/10/2021	Antibribery & Corruption Awareness	04/10/2021	Scheduled Waste Management Training	19/11/2021	<p>Complied</p>
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Genting Sri Gading Estate	
Training	Date
Forced Labour Training	04/02/2021
HCV and RTE Training	23/11/2021
Scheduled Waste Management Training	23/11/2021
Safe Tractor Driving Training	10/12/2021
EFB Application Training	10/12/2021
Saliva Test Kit (Covid-19) Training	23/09/2021
PPE, Chemical Spraying and Trunk Injection Training	07/07/2021
Harvesting Training	07/01/2021
Safe Operation at Nursery	05/02/2021
Riparian & Buffer Zone Training	23/11/2021
Genting Kulai Besar Estate	
Training	Date
Rat Baiting Training	11/02/2022
Multilanguage Careline Briefing	29/11/2021
HCV & RTE Training	16/09/2021
Riparian Zone Training	17/09/2021
Tractor Driver Training	20/09/2021

		<table border="1" style="width: 100%;"> <tr> <td style="width: 70%;">Harvesting Training</td> <td style="width: 30%;">10/08/2021</td> </tr> </table> <p>Sample trainings planned and completed for GSRE in 2021 were as following:</p> <ol style="list-style-type: none"> 5. Refresher training on company policy; Date: 4/1/2021; Participant: All Workers; Trainer: Management (In-house) 6. FFB Transporter training; Date: 23/3/2021; Participant: All FFB Transporter's (Contractor) Drivers; Trainer: Management (In-house) 7. Road-crossing awareness and training; Date: 13/11/2021; Participant: All workers, contractors and local community (stakeholders); Trainer: Management (In-house) 8. Fire extinguisher and emergency response team training; Date: 15/11/2021; Participant: Fire-fighting and Emergency Response Team; Trainer: RSPP Enterprise (External) 9. Chemical mixing and PPE training; Date: 5/12/2021; Participant: All sprayers and chemical handlers; Trainer: G-Planter (External) 10. Mist-blower spraying training; Date: 8/12/2021; Participant: All sprayers; Trainer: Samurai Sdn. Bhd. (External) 11. Harvesting training; Date: 12/12/2021; Participant: All harvesters; Trainer: Palm Pro (External) 	Harvesting Training	10/08/2021	
Harvesting Training	10/08/2021				
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>The Traceability and Supply Chain training has been conducted at the mill on 12/08/2021 and 25/11/2021 for personals involved in the supply chain process in the mill. Among the attendees the Mill Manager, Senor Assistant Manager, Chief Clerk, Weighbridge Attendant.</p>	Complied		
<p>Criterion 3.8: Supply chain requirement for mills</p>					

(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	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Genting Ayer Item Oil Mill received certified FFB from own supply base only. Thus, the mill is opted for Identity Preserved Module. There is no uncertified FFB received by the mill. Therefore, no physical separation is required. Volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO Certified Products was verified.</p>	Complied
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Genting Ayer Item Oil Mill received certified FFB from own supply base only. Thus, the mill is opted for Identity Preserved Module. This indicator is not applicable to the mill.</p>	Not Applicable
3.8.3	<p>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.</p>	<p>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.</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The registration of PalmTrace will be carried out by the Marketing Palm Products Department (MPP), HQ. All transaction will be</p>	Complied

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		<p>registered in the PalmTrace. The mill registered license available in PalmTrace as following:</p> <ul style="list-style-type: none"> - Member ID: RSPO_PO1000002439 - Member category: Oil Mill - RSPO Membership No.: 1-0086-06-000-00 	
<p>3.8.5</p>	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. 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>Genting Plantations Berhad has developed Supply Chain and Traceability (Palm Oil Mill) Procedure (Doc. No.: SMP-GPB-23, Rev. 13 dated February 2022) to ensure that handling of incoming FFB and outgoing CPO & PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. Other supporting documents were developed for the implementation of supply chain as below:</p> <ol style="list-style-type: none"> 1. Handling, Storage, Preservation and Delivery Procedure (Doc. No.: PM-LAB-03, Rev. 0 dated 02/01/2018) 2. Product Identification & Traceability Procedure (Doc. No.: PM-PRD-01, Rev. 0 dated 02/01/2018) 3. Control of Nonconforming/ Noncertified Product Procedure (Doc. No.: PM-PRD-05, Rev. 01 dated 12/12/2019) 4. Handling of Customer Feedback/ Complaints Procedure (Doc. No.: PM-MKT-05, Rev 0 dated 02/01/2018) <p>Trainings on traceability were conducted on as below:</p> <ol style="list-style-type: none"> 1. Training o RSPO, MSPO & ISCC – Traceability, Supply Chain and Chain of Custody on 12/08/2021 involved weighbridge operators and office clerks. 2. Traceability, mass balance and supply chain – WB on 25/11/2021 involved weighbridge operators. <p>The Chief Clerk of the mill has been appointed as person-in-charge of Supply Chain, Traceability and Identity Preserved (IP)</p>	<p>Complied</p>

		requirements of RSPO, ISCC and MSPO Sustainability Standards. Appointment letter dated 04/12/2017 was sighted. Interviewed with the weighbridge operator confirmed that she is aware and understand the supply chain traceability.	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Genting Plantations Berhad has developed Sustainability Internal Audit procedure with Doc. No.: SMP-GPB-03, Rev. 06 dated August 2021 to plan and implement internal audits to determine conformance to the applicable sustainability standards' requirements such as RSPO, MSPO and ISCC. The frequency of the audit is not less than once a year.</p> <p>Internal audit was carried out on 16 – 17/12/2021 with no non-conformity raised related to supply chain. Seen the Internal Audit Plan where the requirements of the RSPO Market Communications and Claims were audited.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>The mill only receives FFB from own supplying bases and the weighbridge clerks have checked the incoming documents from supplying bases to ensure all the information is available. Sampled of dispatch notes from supply baes as below:</p> <p>a. The name and address of the seller – Genting Sri Gading Estate, Batu Pahat</p> <p>b. The delivery date – 15/12/2021</p> <p>c. The date in which the documents were issued – 15/12/2021</p> <p>d. Product – RSPO Certified FFB</p>	Complied

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		<ul style="list-style-type: none"> e. The quantity of the products delivered – 12,330 kgs f. Any related transport documentation – Despatch Note# FFB21004213W g. Supply Chain certificate number of the seller – RSPO 653474 h. A unique identification number – Despatch Note# FFB21004213W a. The name and address of the seller – Genting Tebong Estate, Melaka b. The delivery date – 24/12/2021 c. The date in which the documents were issued – 24/12/2021 d. Product – RSPO Certified FFB e. The quantity of the products delivered – 38,540 kgs f. Any related transport documentation – Despatch Note# FFB21005362W g. Supply Chain certificate number of the seller – RSPO 653474 h. A unique identification number – Despatch Note# FFB21005362W a. The name and address of the seller – Genting Kulai Besar Estate, Melaka b. The delivery date – 31/12/2021 c. The date in which the documents were issued – 31/12/2021 	
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		<ul style="list-style-type: none"> d. Product – RSPO Certified FFB e. The quantity of the products delivered – 19,280 kgs f. Any related transport documentation – Despatch Note# FFB21003527W g. Supply Chain certificate number of the seller – RSPO 653474 h. A unique identification number – Despatch Note# FFB21003527W <p>There has been no projected overproduction. Nonetheless, based on interview with the staff, the facility is aware of this requirement.</p> <p>The mechanism for handling non-conforming oil palm products and/or documents is addressed under Control of Non-conforming Product [PM-PRD-05, rev. 0, dated 02/01/2018] which describes the non-certified material or product shall be kept segregated from the certified ones.</p>	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil 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; 	<p>All the information required by the standard was available in various shipping documents such as mill’s weighbridge. Sampled of the sales and goods out as below:</p> <ul style="list-style-type: none"> 1) Contract No.: SMW/1221/A02CPO <ul style="list-style-type: none"> a. The name and address of the buyer – XXX, Johor b. The name and address of the seller – Genting Ayer Item Oil Mill, Johor c. The loading or shipment / delivery date – 08/12/2021 d. The date on which the documents were issued – 08/12/2021 e. RSPO Certificate number – RSPO 653474 	Complied

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	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> f. A description of the product, including the applicable supply chain model (Identity Preserved, Segregated, Mass Balance, or the approved abbreviations) – RSPO MB CPO g. The quantity of the products delivered – 40,860 kgs h. Any related transport documentation – Weighbridge Ticket# CPOMB21000299W i. A unique identification number(s) – Weighbridge Ticket# CPOMB21000299W <p>2) Contract No.: SMW/1221/A02CPO</p> <ul style="list-style-type: none"> a. The name and address of the buyer – XXX, Johor b. The name and address of the seller – Genting Ayer Item Oil Mill, Johor c. The loading or shipment / delivery date – 08/12/2021 d. The date on which the documents were issued – 08/12/2021 e. RSPO Certificate number – RSPO 653474 f. A description of the product, including the applicable supply chain model (Identity Preserved, Segregated, Mass Balance, or the approved abbreviations) – RSPO IP PK g. The quantity of the products delivered – 40,280 kgs h. Any related transport documentation – Weighbridge Ticket# PKIP21000261W i. A unique identification number(s) – Weighbridge Ticket# PKIP21000261W 	
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 	<p>There is no any outsourcing activity related to processing and storage except for transporter of CPO. Seen the agreement for the CPO transporters dated 01/11/2021 for Teo Tuan Kwee Sdn Bhd and 19/04/2021 for Makmur Transport Sdn Bhd. Requirements of RSPO, ISCC, MSPO and OSHA was stated clearly in the agreement signed by the contractors. The contractor shall ensure to provide</p>	Complied

	<p>the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>cooperation and relevant access to the appointed Certification Bodies into their respective operations, systems and any and all information when this is announced in advance.</p>	
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>The mill has recorded the details of the contractors engaged by the mill in the stakeholder list last updated on 30/11/2021.</p>	Complied
3.8.11	<p>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.</p>	<p>There were no new contractors used for the physical handling of RSPO certified products by the mill.</p>	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>Genting Ayer Item Oil Mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p>	Complied

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	<ul style="list-style-type: none"> ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 	<p>Retention period of all supply chain documented information retained for more than two years as per sample sighted in indicator 3.8.7 - 3.8.9 above.</p> <p>All the inventory records are maintained and updated on daily basis and monthly. Daily records are prepared at the entry point at the weighbridge.</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The OER and KER are measured on daily basis based on actual production, aggregated and reported on daily, weekly, monthly and annually basis through the mill production report. Based on the sample Factory Crop Intake and Production Statement, average OER and KER for period of Jan – Dec 2021 was 20.32% (OER) & 5.10% (KER).</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The OER and KER are measured on daily basis, aggregated and reported on daily, weekly, monthly and annually basis through the mill production report.</p>	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>	<p>Genting Ayer Item Oil Mill only processes certified FFB from its own certified supply base therefore only produces certified CPO and PK in the mill. Therefore there is no necessity to segregate the palm products as there are no non-certified products in the mill.</p>	Complied
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<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 as per sample sighted below:</p> <ol style="list-style-type: none"> 1. Contract Number: SMW/1221/A07CPO; Despatch Date: 23/12/2021; PalmTrace Announcement Date: 19/01/2022. 2. Contract Number: SMW/1221/A06CPO; Despatch Date: 17/12/2021; PalmTrace Announcement Date: 22/12/2021. 3. Contract Number: SMW/0421/A01PK; Despatch Date: 13/04/2021; Palm Trace Announcement Date: 21/04/2021. 	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied
General corporate communications			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>No off-product claim made by GAIOM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.).</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p>	<p>Not applicable as no off-product claim made by GAIOM as to date.</p>	Not Applicable

	<p>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. 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>		
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 no off-product claim made by GAIOM as to date.	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 no off-product claim made by GAIOM as to date.	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.	No evidence of RSPO corporate logo used by GAIOM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.).	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	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 MB) and RSPO certificate number.	Complied

5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Genting Ayer Item Oil Mill is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not Applicable
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.	No business to consumer communication on product specific claim made Genting Ayer Item Oil Mill and only producing crude and unfinished product. This is not applicable for Genting Ayer Item Oil Mill.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	No business to consumer communication on product specific claim made Genting Ayer Item Oil Mill and only producing crude and unfinished product. This is not applicable for Genting Ayer Item Oil Mill.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made Genting Ayer Item Oil Mill and only producing crude and unfinished product. This is not applicable for Genting Ayer Item Oil Mill.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	No business to consumer communication on product specific claim made Genting Ayer Item Oil Mill and only producing crude and	Not Applicable

		unfinished product. This is not applicable for Genting Ayer Item Oil Mill.	
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made Genting Ayer Item Oil Mill and only producing crude and unfinished product. This is not applicable for Genting Ayer Item Oil Mill.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made Genting Ayer Item Oil Mill and only producing crude and unfinished product. This is not applicable for Genting Ayer Item Oil Mill.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made Genting Ayer Item Oil Mill and only producing crude and unfinished product. This is not applicable for Genting Ayer Item Oil Mill.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to 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	No business to consumer communication on product specific claim made Genting Ayer Item Oil Mill and only producing crude and unfinished product. This is not applicable for Genting Ayer Item Oil Mill.	Not Applicable

	applying to RSPO supply chain certified members. The guidance document for audits is available on www.rsपो.org .		
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Oil palm content is 100% CPO and claim as RSPO IP-certified. GAIOM is producing crude palm product and does not involved in any labelling of end product.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Oil palm content is 100% CPO and claim as RSPO IP-certified. GAIOM is producing crude palm product and does not involved in any labelling of end product.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Oil palm content is 100% CPO and claim as RSPO IP-certified. GAIOM is producing crude palm product and does not involved in any labelling of end product.	Complied
Labelling and trademark (IP)			
	Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	GAIOM does not use the RSPO label in its product (CPO & PK). This is confirmed due site visit observation and interview with the mill workers.	Complied
Messaging (IP)			

	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>No evidence of storytelling in product related communication. Hence, this requirement is not applicable</p>	<p>Not Applicable</p>
<p>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company respect human rights and support international human rights law. They protect retaliation against human rights defenders who submit complaints in good faith. Briefing of the policy was conducted on 15/02/2022 to the workers in Genting Sri Gading Estate, 01/03/2021 in Genting Ayer Item Oil Mill and 16/11/2021 in Genting Kulai Besar Estate. Records of the training such as attendance list was sighted.</p>	<p>Complied</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>Genting Plantations Berhad ensure all personnel are treated fairly and protected from any form of discrimination that would constitute a violation of their human rights. Interviewed with the workers confirmed that no harassment by the management.</p>	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has established Complaints and Grievances procedure with Doc. No.: SMP-GPB-19, Rev. 04 dated March 2020 to provide guidelines on handling complaints & grievances involved internal and external stakeholders.</p> <p>Besides, Social Policy dated 14/09/2020 was established where they prohibit retaliation against human rights defenders who submit complaints in good faith in line with their existing Whistle-blower policy which provide a grievances channel for human rights defenders to report their concerns freely and without fear of reprisal or intimidation.</p>	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>Genting Plantations Berhad has established Complaints and Grievances procedure with Doc. No.: SMP-GPB-19, Rev. 04 dated March 2020 to provide guidelines on handling complaints & grievances involved internal and external stakeholders. All the written confidential complaints shall be dealt by Manager. The timeframe for the action to be taken depends on seriousness of the complaints or grievance. The accepted timeframe to acknowledge and respond to the complaint or grievances is within 1 month upon receipt.</p> <p>Whistle-blower policy dated 01/06/2020 was implemented and this is available in https://www.gentingplantations.com/wp-content/uploads/2020/06/Whistleblower-Policy.pdf.</p>	Complied

		<p>There was a new channel for workers to raise their grievances through CARELINE MOBILE. Seen the memo dated 04/11/2022 with Careline mobile number, person in charge, email address and operating hours. The CARELINE MOBILE is operating 24 hours a day, 7 days a week.</p> <p>Briefing of the procedure was conducted on 11/01/2022 in Genting Sri Gading Estate, 01/03/2021 in Genting Ayer Item Oil Mill and 17/11/2021 in Genting Kulai Besar Estate.</p>	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>The estates ad mill has Complaints/ Grievances Record Book to record any complaint or grievance received. Sampled of the records of complaint as below:</p> <ol style="list-style-type: none"> 1. Ref No.: 084 dated 30/03/2021 Issue: Toilet clogged at House No.: E-57. Action: The management has appointed Indah Water Konsortium Sdn Bhd to carry out the cleaning of septic tank and seen the Cheque Voucher# 8290 dated 24/07/2021. 2. Ref No.: 130 dated 08/12/2021 Issue: To request the management to take action towards the worker who drunk and caused problem. Action: The management has issued three warning letters to the respective worker and currently is in the progress to terminate his employment and send back to his home country. 	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 mentioned in the procedure above, under Clause 2.1.10, the complainant shall be given the option of access to independent legal and technical advice, to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p>	Complied

Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
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><u>Genting Sri Gading Estate</u></p> <p>The estates' management has provided chicken to all the workers in the estate during festival celebration such as Deepavali. Besides, management of Genting Sri Gading Estate has made financial assistance to the kindergartens that affected by flood. The representative from kindergartens has formally requested on 12/10/2021 and the management has contributed on 11/11/2021 as verified the cheque vouchers. The mill management has provided assistance such as supplied soil to the stakeholders who requested it.</p> <p><u>Genting Tebong Estate</u></p> <p>There is evidence that contribution has been made to community in year 2021 where contribution has been made to Kuil Sri Mah Mariamman for annual prayer on 25/10/2021 where it has been confirmed base on document and interview with stakeholders. Other than that, estate has purchased chicken for Eid Fitri and meat for Eid Adha and has been distributed to all workers.</p> <p><u>Genting Tanah Merah Estate</u></p> <p>There is several contributions has been made for year 2021 and has been recorded in the logbook, CSR Project Photo. There is evidence contribution to vaccination centre in Tangkak, repairing Masjid Sagil Pekan and contribution to Sekolah Rendah Kebangsaan Bukit Banjar. For workers, sighted contribution of chiecken for Deepavali celebration and Chinese New Year.</p>	Complied
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>	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The was no evidence to show that oil palm cultivation activities in the estates had diminished the land use rights of others. Verified documents to show legal ownership of its land by Genting Plantations Berhad.</p> <p>Total of 30 land titles available in Genting Sri Gading Estate and sampled the land titles as below:</p> <ol style="list-style-type: none"> 1. Title No.: 120698; Lot No.: 198; Area: 20.0193 ha 2. Title No.: 101233; Lot No.: 1324; Area: 40.4938 ha 3. Title No.: 94851; Lot No.: 5223; Area: 75.2461 ha 4. Title No.: 89377; Lot No.: 1299; Area: 28.3785 ha <p>Payment of quit rent dated 06/04/2021 was sighted.</p> <p>Genting Ayer Item Oil Mill was located inside the land of Genting Sungei Rakyat Estate under the land title# 96424; Lot No.: 227 and Lot No.: 228 for total 88.7 acres as seen in the tenancy agreement dated 22/12/2021 between Genting Plantations (WM) Sdn Bhd and Genting Oil Mill Sdn Bhd.</p> <p>Total of 28 land titles available in Genting Kulai Besar Estate and sampled the land titles as below:</p> <ol style="list-style-type: none"> 1. Title No.: 308159; Lot No.: PTD 15379; Area: 623.28 ha 2. Title No.: 34053; Lot No.: PTD 47454; Area: 68.35 ha 3. Title No.: 34088; Lot No.: PTD 47458; Area: 150.37 ha <p>Payment of quit rent dated 14/04/2021 and 15/03/2021 was sighted.</p>	<p>Complied</p>
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		Genting Tebong Estate has maintain list of land title which has been divided into 7 division (Tebong, Repah, See Kee) with total 21 land title. While for Genting Sungei Rakyat, total 31 land title has been verified which include 3 division (Tanjung, Bangkar, Singmah). Sample has been taken as per below for Lot Numbers H.S.(D) 812555, H.S.(D) 99155 and RN 96424.	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no customary right in all the estates under certification unit as the land is belong to Genting Plantations Berhad. It was verified through document review on the land titles and interviewed with stakeholders confirmed that there is no any land dispute reported.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	There is no customary right in all the estates under certification unit as the land is belong to Genting Plantations Berhad. It was verified through document review on the land titles and interviewed with stakeholders confirmed that there is no any land dispute reported.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	There is no customary right in all the estates under certification unit as the land is belong to Genting Plantations Berhad. It was verified through document review on the land titles and interviewed with stakeholders confirmed that there is no any land dispute reported. Therefore, no agreement-making process and negotiated agreements detailing FPIC process is necessary and available.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	There is no customary right in all the estates under certification unit as the land is belong to Genting Plantations Berhad. It was verified through document review on the land titles and interviewed with stakeholders confirmed that there is no any land dispute reported. Therefore, no agreement-making process and negotiated agreements detailing FPIC process is necessary and available.	Complied

4.4.3	<p>(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 -</p>	<p>Genting Sri Gading Estate has developed Boundary Stone Map dated 10/06/2011 and indicated all the boundary stones located. The map with scale of 1:30,150 was sighted. The legal boundary for all estates visited was clearly demarcated with legal boundary stone.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -</p>	<p>There is no customary right in all the estates under certification unit as the land is belong to Genting Plantations Berhad. It was verified through document review on the land titles and interviewed with stakeholders confirmed that there is no any land dispute reported. Therefore, no agreement-making process and negotiated agreements detailing FPIC process is necessary and available.</p>	Complied
4.4.5	<p>(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 -</p>	<p>There is no customary right in all the estates under certification unit as the land is belong to Genting Plantations Berhad. It was verified through document review on the land titles and interviewed with stakeholders confirmed that there is no any land dispute reported. Therefore, no agreement-making process and negotiated agreements detailing FPIC process is necessary and available.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -</p>	<p>There is no customary right in all the estates under certification unit as the land is belong to Genting Plantations Berhad. It was verified through document review on the land titles and interviewed with stakeholders confirmed that there is no any land dispute reported. Therefore, no agreement-making process and negotiated agreements detailing FPIC process is necessary and available.</p>	Complied
<p>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.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -</p>	<p>Based on the SIA, there is no customary land present in all estates under certification unit. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers.</p>	Complied

4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>The plantation was established since 1980s and there was no new planting in estates under certification unit since last audit. Therefore, FPIC should not be applicable.</p> <p>Genting Plantations Berhad has established the Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>The plantation was established since 1980s and there was no new planting in estates under certification unit since last audit. Therefore, FPIC should not be applicable.</p> <p>Genting Plantations Berhad has established the Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>The plantation was established since 1980s and there was no new planting in estates under certification unit since last audit. Therefore, FPIC should not be applicable.</p> <p>Genting Plantations Berhad has established the Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities</p>	Complied

		to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.	
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>The plantation was established since 1980s and there was no new planting in estates under certification unit since last audit. Therefore, FPIC should not be applicable.</p> <p>Genting Plantations Berhad has established the Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>The plantation was established since 1980s and there was no new planting in estates under certification unit since last audit. Therefore, FPIC should not be applicable.</p> <p>Genting Plantations Berhad has established the Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.5.7	<p>New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.</p> <p>- Minor compliance -</p>	<p>The plantation was established since 1980s and there was no new planting in estates under certification unit since last audit. Therefore, FPIC should not be applicable.</p> <p>Genting Plantations Berhad has established the Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior &</p>	Complied

		Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.	
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	The plantation was established since 1980s and there was no new planting in all estates under certification unit since last audit.	Complied
<p>Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	Based on the SIA, there is no customary land present in all estates under the certification unit. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers. Through stakeholder interviews, there was no land dispute identified. Genting Plantations Berhad has established Procedure on Conflict Resolution and Handling of Negotiations and Compensations within Genting Plantations Estates (Doc. No.: SMP-GPB-18, Rev. 03 dated 29/12/2017) to handle any dispute case. Compensation procedure was outlined in the procedure.	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	Procedure has been documented in the document number SMP-GPB-18 dated 29/12/2017 revision 03 title procedure on conflict resolution and handling of negotiations and compensation within Genting Plantations Estate	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	There is no scheme smallholder involved in the certification unit.	Complied

4.6.4	<p>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.</p> <p>- Minor compliance -</p>	<p>SOP refer to Indicator 4.6.1. There was no any land dispute reported since last. This has verified through interview with the stakeholders.</p>	Complied
<p>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.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The plantation was established since 1980s and there was no new planting in estates under certification unit since last audit. Therefore, FPIC should not be applicable.</p> <p>Genting Plantations Berhad has established the Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>The plantation was established since 1980s and there was no new planting in estates under certification unit since last audit. Therefore, FPIC should not be applicable.</p> <p>Genting Plantations Berhad has established the Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p>	Complied

4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>There is no any land acquisition of communities since last audit. However, the estate management has provided employment opportunity to the local communities as verified through the master list of employees.</p>	Complied
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>The plantation was established since 1980s and there was no new planting in estates under certification unit since last audit. Therefore, FPIC should not be applicable.</p> <p>Genting Plantations Berhad has established the Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>All the estates under certification unit had maintained all existing user rights and it is confirmed during interview with stakeholders.</p>	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p>	<p>The plantation was established since 1980s and there was no new planting in all the estates under certification unit since last audit.</p>	Complied

	- 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 -	Genting Plantations Berhad has established the Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation. There was no land dispute reported since last audit. This has verified through interview with the stakeholder.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	The prices paid for FFB was publicly available at weighbridge area and updated weekly, however no outside crop was send to GAIOM since it is certified as an RSPO IP mill.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Genting Ayer Item Oil Mill only receives FFB from its own certified estate within the certification unit. There are no smallholders that supply FFB to the mill as verified during the assessment. Hence this indicator is not applicable.	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Genting Ayer Item Oil Mill only receives FFB from its own certified estate within the certification unit. There are no smallholders that supply FFB to the mill as verified during the assessment. Hence this indicator is not applicable.	Not Applicable
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	Genting Ayer Item Oil Mill only receives FFB from its own certified estate within the certification unit. There are no smallholders that supply FFB to the mill as verified during the assessment. Hence this indicator is not applicable.	Not Applicable

	<p>repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>		
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Genting Ayer Item Oil Mill only receives FFB from its own certified estate within the certification unit. There are no smallholders that supply FFB to the mill as verified during the assessment. Hence this indicator is not applicable.</p>	Not Applicable
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Ayer Item Oil Mill only receives FFB from its own certified estate within the certification unit. There are no smallholders that supply FFB to the mill as verified during the assessment. Hence this indicator is not applicable.</p>	Not Applicable
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Genting Ayer Item Oil Mill only receives FFB from its own certified estate within the certification unit. There are no smallholders that supply FFB to the mill as verified during the assessment. Hence this indicator is not applicable.</p>	Not Applicable
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	<p>Genting Ayer Item Oil Mill only receives FFB from its own certified estate within the certification unit. There are no smallholders that supply FFB to the mill as verified during the assessment. Hence 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>Genting Ayer Item Oil Mill only receives FFB from its own certified estate within the certification unit. There are no smallholders that supply FFB to the mill as verified during the assessment. Hence this indicator is not applicable.</p>	Not Applicable
<p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			

5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Genting Ayer Item Oil Mill only receives FFB from its own certified estate within the certification unit. There are no smallholders that supply FFB to the mill as verified during the assessment. Hence this indicator is not applicable.	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	Genting Ayer Item Oil Mill only receives FFB from its own certified estate within the certification unit. There are no smallholders that supply FFB to the mill as verified during the assessment. Hence this indicator is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Genting Ayer Item Oil Mill only receives FFB from its own certified estate within the certification unit. There are no smallholders that supply FFB to the mill as verified during the assessment. Hence this indicator is not applicable.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Genting Ayer Item Oil Mill only receives FFB from its own certified estate within the certification unit. There are no smallholders that supply FFB to the mill as verified during the assessment. Hence 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 -	Genting Ayer Item Oil Mill only receives FFB from its own certified estate within the certification unit. There are no smallholders that supply FFB to the mill as verified during the assessment. Hence 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	Genting Plantations Berhad has established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The	Complied

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	origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	company shall not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on rase, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.	
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance -	Interviewed with workers comprises of local and foreign workers, male and female workers confirmed that they were treated equally. No discrimination was reported based on nationality, gender and races.	Complied
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	As per the Procedure for Social Management, the recruitment and promotion were based on merit and skills. No discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. Interviewed with the workers confirmed that the promotion is based on capabilities. There were female mandors in Genting Sri Gading Estate and they were promoted through examination.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	Refer to the Procedure for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021), Clause 6.8.5, no pregnancy testing will be carried out as a condition of hiring or for continued employment. Interviewed with female workers confirmed that pregnancy testing is not a criterion for pre-employment. A pre-medical check-up was conducted by Hospital Assistant to check whether the worker is fit for work or not. Urine test was conducted but is only tested for drug and glucose level. Seen the record of pre-employment medical check-up report dated 01/09/2021 in Genting Sri Gading Estate.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	Gender & Children Committee was established in the Genting Sri Gading Estate, Genting Ayer Item Oil Mill and Genting Kulai Besar Estate. The last meeting was conducted on 29/09/2021 in Genting Sri Gading Estate, 14/12/2021 in Genting Ayer Item Oil Mill and	Complied

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		<p>20/01/2022 in Genting Kulai Besar Estate. Reviewed the meeting minutes found no issue was reported. There was no case of sexual harassment and violence reported as confirmed through interviewed with female workers. Briefing of the sexual harassment and important of gender compliance was conducted on 23/11/2021 in Genting Sri Gading Estate by Sustainability Team.</p> <p>Gender committee for women has been established for each operating unit. For Genting Tebong Estate, gender committee has been led by Puan Noor Henny and participate representative from employer and employee. Latest meeting has been done on 09/12/2021, 21/06/2021 with attendance of 10 persons. Agenda of the meeting is to appoint new organization for gender committee, explanation on the policy, and explanation of sexual harassment.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>The female workers employed in the estates and mill are local Malaysian and foreign workers. Reviewed total 58 payslips which consists of male and female workers found that their salary is the same for the same job scope. They were paid according to the Minimum Wage Order 2020 without any discrimination.</p>	Complied
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Collective agreement sighted in the document MAPA/NUPW agreement on the wages of harvesters, harvesting kanganies, loaders and other loaders on oil palm estates, 2019 and MAPA/NUPW field and other general employees and fringe benefits agreement, 2019.</p> <p>Sample of 58 employment contracts are reviewed and the agreements are signed in Bahasa Malaysia and their native language. Upon the foreign workers arriving to the estate, they will</p>	Complied

		be inducted for the terms and conditions of employment contract and briefed on the company's policies.	
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>Genting Plantations Berhad has established the template for employment agreement for all workers entitled "Perjanjian Pekerjaan". Refer template no. HRAD WM, rev.4 dated 07/01/2019. All the terms and conditions stated in the employment agreement were as per Labour Act 1955, latest MAPA/NUPW Agreement and Minimum Wage Order 2020 (amendment).</p> <p>Reviewed total 58 employment contracts and the contracts are signed in Bahasa Malaysia and native language. The terms and conditions such as working hours, deduction, overtime, sick leave, holiday entitlement, reason of dismissal and period of notice were outlined in the contract. The extension contract has followed the terms and condition as per the original signed contract.</p> <p>Sample of employment contract has been verified by auditor for each operating unit and there is evidence employment term and condition has been outlined in the employment contract. It can be further improved to include more details specifically on deduction such as Employee Provident Fund (EPF), electricity and water. Hence, an OFI was raised.</p>	OFI
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>Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.2.2 above shown 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>58 samples for workers in various operations including harvester, field workers, contractor's workers and general workers were</p>	Non-compliance

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		<p>verified. Overtime was appropriate and the wages were complying with Minimum Wage Order 2020.</p> <p><u>Sing Mah Division</u></p> <p>Sample of workers has been taken by auditor and personal document (employment contract, payslips, check roll records, permit/passport and EPF contribution) for month May, June and November 2021 has been verified. Sighted there is no contribution been made for the sampled Malaysian workers. This contradicts with what has been mentioned in Employee Provident Fund (EPF) Act 1991. Hence, a Critical Non-Conformity was raised.</p>	
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>Genting Sri Gading Estate has provided free housing facilities to all the workers included contracted workers. The water and electricity were subsidized by the company to all the workers. Besides, for those workers who are staying outside the estate have provided with housing allowance. The management has monitored all houses and in progress to upgrade the labour quarters such as replace new tiles and painting.</p> <p>Genting Plantations Berhad has in progress to distribute free furniture such as bed frame, mattress, meat safe, metal wardrobe, pillow, bedsheet, table and chair to all the workers on site. Photo evident of furniture distributed was sighted.</p> <p>The linesite inspection was carried out by Hospital Assistant on weekly basis and recorded in the Linesite Weekly Visit checklist in Genting Sri Gading Estate. Seen the inspection records from February 2021 to January 2022. Photo was taken if any issues found and attached in the inspection checklist with propose action to be taken. Site visit verified the issues raised were resolved accordingly.</p>	Non-compliance

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		<p>The mill management has carried out the linesite inspection on weekly basis. Site visit to the housing area found the surrounding was cleaned and well kept.</p> <p>Linesite inspection was carried out on weekly basis by Hospital Assistant in Genting Kulai Besar Estate. Most of the issues recorded were minor issues and the Hospital Assistant has instructed the workers to take immediate action.</p> <p>Line site inspection has been done by the management on weekly basis and has been verified for inspection on 25/01/2022, 18/01/2022 and 11/01/2022. As per line site inspection, there is no issues has been highlighted during the inspection. However, during the site visit to Home Division Labor Quarter, Genting Tebong Estate, it found that,</p> <ol style="list-style-type: none"> 1. Grass cutting has not been done and unmanageable. 2. Domestic waste has not been properly managed and disposed. 3. Blocked and damage drainage system 4. Unrepaired mosquitoes netting. 5. Illegal electrical wiring. 6. Damage harvesting equipment has not been properly disposed. 	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There was sundry shop nearby the estates and mill area. Besides, the estates and mill were located nearby to the town and the workers can access to town by own/ public transport. Site visit to the housing area found that workers are allowed plant/ farm vegetable at the housing area. Interviewed with the workers informed that they have no issue to access to foods and goods.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p>	<p>Genting Plantations Berhad has established the prevailing wage calculation last updated on 10/02/2022 for Genting Sri Gading</p>	Complied

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<p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p>	<p>Estate, 08/02/2022 in Genting Ayer Item Oil Mill and 22/02/2021 in Genting Kulai Besar Estate to include all the in-kind benefits provided to the workers. Sampled the prevailing wages per worker for benefit as below:</p> <table border="1" data-bbox="1137 497 1926 1074"> <thead> <tr> <th>In-kind benefit</th> <th>Operating Unit</th> <th>Cost per worker/ RM</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Electricity & Water</td> <td>Genting Sri Gading Estate</td> <td>26</td> </tr> <tr> <td>Genting Ayer Item Oil Mill</td> <td>11</td> </tr> <tr> <td>Genting Kulai Besar Estate</td> <td>17</td> </tr> <tr> <td rowspan="3">Healthcare</td> <td>Genting Sri Gading Estate</td> <td>29</td> </tr> <tr> <td>Genting Ayer Item Oil Mill</td> <td>14</td> </tr> <tr> <td>Genting Kulai Besar Estate</td> <td>26</td> </tr> </tbody> </table> <p>The prevailing wages is more than the Minimum Wage Order 2020.</p>	In-kind benefit	Operating Unit	Cost per worker/ RM	Electricity & Water	Genting Sri Gading Estate	26	Genting Ayer Item Oil Mill	11	Genting Kulai Besar Estate	17	Healthcare	Genting Sri Gading Estate	29	Genting Ayer Item Oil Mill	14	Genting Kulai Besar Estate	26	
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	<p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>There was no casual worker employed by the mill and estates. All the workers are permanent workers. Contract workers are employed by contractors for permanent work such as harvester and FFB transporter in the estates.</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>Genting Plantation Berhad has established internal policy titled "Social Policy" dated 14/09/2020 and stated in the policy the management will respect the rights of workers to join or form legal trade unions of their own choosing and to bargain collectively. Base on the interview with NUPW representative, he mentioned registration for union membership is still minimal for all Genting Plantation estate.</p> <p>It can be further improved by the management to assist union to communicate benefit of joining union and registered union that available.</p>	OFI

<p>6.3.2</p>	<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>Workers Committee was established in Genting Sri Gading Estate and Genting Kulai Besar Estate. Meeting between the management and workers’ representatives was conducted on 17/12/2021 and 22/03/2021 respectively. Meeting minutes was sighted and no issue was reported by the workers. Interviewed with the workers’ representatives confirmed that no issue with the management.</p> <p>The mill management has conducted internal stakeholder meeting/ Sustainability Committee meeting on 08/12/2021 with the workers to discuss issues from the workers. Meeting minutes was sighted and issues raised were recorded in the minutes. Besides, the issues raised were incorporated into the social management plan dated 10/02/2022 to identify the action to be taken and status of the issues.</p> <p>Union meeting has been conducted for Genting Kulai Besar Estate on 23/12/2021 with attendance of workers representative and 2 observers from management. Some issues has been raised during the meeting such as some toilet for labour quarters is damage and to repair main road at the entrance.</p> <p>While for Genting Sungei Rakyat Estate, it has been identified that workers are free to join any trade union base on the participation to NUPW and confirm during interview with the workers. Latest meeting has been done on 03/02/2022.</p>	<p>Complied</p>
<p>6.3.3</p>	<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>Seen the record of appointment letters of the workers’ committee found that the management only issued the appointment letter based on the result of election by the workers. The appointment letters dated 15/02/2022 in Genting Sri Gading Estate were sighted. Interviewed with the workers’ representatives confirmed that they were elected among the workers. No interference from management.</p>	<p>Complied</p>

		<p>The representatives of different nationalities in Genting Ayer Item Oil Mill were elected by all the workers during morning muster on 05/11/2021. Record of election was sighted.</p> <p>For Genting Tanah Merah Estate, sighted election has been done which has been coordinate by the Mr Safrien. As interview with stakeholders, it has been confirmed that no interference with the process.</p>	
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>Genting Plantations Berhad has established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where the company shall not use any child labour. Children’s right are respected. There was specific clause in the agreement with contractors mentioned the contractor shall ensure no minor (Below 18 years old) are employed.</p>	Complied
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>	<p>As per Procedures for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021), Clause 6.8.4, the estate and mill shall verify identification card, passport and work permit before employ workers to ensure no child labour in the company. The contractor shall also provide full details of the workers such as identification card, passport, work permit for age verification by the management. Reviewed the list of workers and passports found that no child labour was employed in the company.</p>	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>	<p>There was no young person employed by all estates under certification unit as verified through the employee master list. Interviewed with the workers and management confirmed that all the workers employed are above 18 years old.</p>	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</p>	<p>Genting Plantations Berhad has established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where the company shall not use any child labour.</p>	Complied

	<p>protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The contractors have signed on the contract agreement where there is a clause mentioned that the contractor shall ensure no minors (below 18 years old) are employed. Interviewed with the contractor confirmed that no child labour was employed.</p>	
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
<p>6.5.1</p>	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited Besides, Sexual Harassment Policy dated 03/08/2009 was developed to ensure harassment-free environment and avoid behaviour that may create an atmosphere of hostility and intimidation of any kind at the workplace. Reproductive rights are protected. Briefing of the policy was conducted on 15/02/2022 to the workers in Genting Sri Gading Estate, 01/03/2021 in Genting Ayer Item Oil Mill and 16/11/2021 in Genting Kulai Besar Estate. Records of the training such as attendance list was sighted.</p> <p>Gender committee for women has been established for each operating unit. For Genting Tebong Estate, gender committee has been led by Puan Noor Henny and participated by representative from employer and employee. Latest meeting has been done on 09/12/2021 with attendance of 10 persons. Agenda of the meeting is to appoint new organization for gender committee, explanation on the policy, and explanation of sexual harassment.</p> <p>For Genting Kulai Besar Estate, gender committee has been established and lead by Ms Khairaney Bt Hasim and latest meeting has been done on 20/01/2022 with attendance of all the committee and previous gender committee meeting has been done 23/03/2021.</p>	<p>Complied</p>

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		Gender committee has been conducted 3 months once for Genting Sungei Rakyat and latest has been conducted on 25/11/2021 with attendance of all female staff and workers. Procedure on Prevention and Eradication of Sexual Harassment at the Workplace was established with Doc. No.: SMP-GPB-20, Rev. 0 dated 11/10/2013. Process of handling sexual harassment complaint was outlined in the procedure.	
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Reproductive rights are protected as stated in the Social Policy. Briefing of the policy was conducted on 15/02/2022 to the workers in Genting Sri Gading Estate, 01/03/2021 in Genting Ayer Item Oil Mill and 16/11/2021 in Genting Kulai Besar Estate. Records of the training such as attendance list was sighted.	Complied
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 -	There was no new mother found in Genting Sri Gading Estate, Genting Ayer Item Oil Mill and Genting Kulai Besar Estate. Therefore, no assessment of new mother needs has carried out. However, the management has appointed person-in-charge to conduct new mother needs assessment if there is any new mother in the estates and mill.	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 -	Genting Plantations Berhad has developed Procedure on Prevention and Eradication of Sexual Harassment at the Workplace (Doc. No.: SMP-GPB-20, Rev. 0 dated 11/10/2013) to the grievance mechanism was established. A Grievance/ Complaint Form for Sexual Harassment was developed to record if there is any complaint. Interviewed with the female workers confirmed that they are aware of the grievance mechanism and no issue reported.	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All workers have entered into employment voluntarily and the following are prohibited:	Genting Plantations Berhad has established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where physical abuse or discipline, the threat of physical abuse, sexual or other	Complied

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	<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 - Critical (Major) compliance - 	<p>harassment and verbal abuse or other forms of intimidation is prohibited Besides, Sexual Harassment Policy dated 03/08/2009 was developed to ensure harassment-free environment and avoid behavior that may create an atmosphere of hostility and intimidation of any kind at the workplace. Reproductive rights are protected. Briefing of the policy was conducted on 15/02/2022 to the workers in Genting Sri Gading Estate, 01/03/2021 in Genting Ayer Item Oil Mill and 16/11/2021 in Genting Kulai Besar Estate. Records of the training such as attendance list was sighted.</p> <p>Procedure on Prevention and Eradication of Sexual Harassment at the Workplace was established with Doc. No.: SMP-GPB-20, Rev. 0 dated 11/10/2013. Process of handling sexual harassment complaint was outlined in the procedure.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Reproductive rights are protected as stated in the Social Policy. Briefing of the policy was conducted on 15/02/2022 to the workers in Genting Sri Gading Estate, 01/03/2021 in Genting Ayer Item Oil Mill and 16/11/2021 in Genting Kulai Besar Estate. Records of the training such as attendance list was sighted.</p>	Complied
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>A blanket letter dated 01/09/2017 has been circulated to the Mill Manager – GAIOM from Senior Vice President – Group Processing stating the appointment as Chairman of Safety and Health Committee.</p> <p>A blanket letter dated 10/02/2014 has been circulated to all operating units stating the Estate Managers for all units are appointed as the Chairman of Safety and Health Committee, undersigned by the VP/General Manager, Plantation West Malaysia.</p> <p>The managers of the respective certification unit have the formed a OSH Committee within the unit consisting of workers and</p>	Complied

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		<p>management representatives to address all issues related Health and Safety.</p> <p>Regular OSH Committee Meetings were held in the mill and to address all issues related to health and safety.</p> <ol style="list-style-type: none"> 1. Genting Ayer Item Oil Mill: the meeting minutes were available for verification dated 26/01/2022 (1st – 2022), 23/11/2021 (4th – 2021) and 19/08/2021 (3rd – 2021). 2. Genting Sri Gading Estate: The meeting minutes were available for verification dated 16/12/2021 (4th-2021), 29/09/2021 (3rd – 2021), 30/06/2021 (2nd – 2021) and 26/03/2021 (1st – 2021). 3. Genting Kulai Besar Estate: The meeting minutes were available for verification dated 2/03/2021 (1st – 2021), 24/06/2021 (2nd – 2021), 24/09/2021 (3rd – 2021) and 23/12/2021 (4th – 2021). 4. Genting Tebong Estate: Latest meeting date: 24/12/2021; Previous meeting date: 24/09/2021, 25/06/2021 & 25/03/2021 5. Genting Tanah Merah Estate: Latest meeting date: 18/11/2021; Previous meeting date: 11/08/2021, 18/05/2021 & 17/02/2021 6. Genting Sungei Rayat Estate: Latest meeting date: 11/11/2021; Previous meeting date: 16/08/2021, 05/05/2021 & 16/02/2021 	
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 Response Procedures were guided by the established System Procedures titled Emergency Response Procedure; Doc Number SP-MGR-04; Revision: 05; Issue Date: 01/07/2013. Emergency Procedures and Safe Working Procedures were displayed 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>	<p>Non-compliance</p>

		<ol style="list-style-type: none"> 1. Genting Ayer Item Oil Mill <ul style="list-style-type: none"> - Fire Safety while Maintenance Work Training – 12/11/2021 - Fire Drill – 26/11/2021 - Fire Drill and Evacuation Training – 01/12/2021 - Fire Extinguisher Training – 20/10/2021 - Chemical Spillage Training – 15/11/2021 2. Genting Sri Gading Estate <ul style="list-style-type: none"> - Fire Drill Training – 20/12/2021 <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> <ol style="list-style-type: none"> 1. Genting Ayer Item Oil Mill – A total of 29 participants from the mill attended the Basic Occupational First Aid (BOFA) Training organised by Cert Academy on 19 – 20/09/2019. 2. Genting Sri Gading Estate – First Aid Practical Refresher Training – 17/02/2021. 3. Genting Kulai Besar Estate – First Aid Training – 03/07/2021. <p>Inspection of first aid kits during visit to the estate worksites found that the First aid kit available at worksites containing insufficient first aiding materials as following: <u>Genting Tanah Merah Estate (GTME):</u></p>	
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		<ol style="list-style-type: none"> 1. P&D Spraying worksite Field # OP19: First aid drops wash not available. Burn-aid cream (CCM) was expired on 07/2021. 2. Harvesting worksite Field OP95A: Burn-aid cream (CCM) was expired on 03/2021. <p><u>Genting Sungei Rayat Estate (GSRE):</u></p> <ol style="list-style-type: none"> 1. Harvesting worksite Field OP97 (Tanjung Division): Sterile eye pads was expired on 10/2021. 2. Creepers manual removal worksite Field OP18D (Bangkar Division): Sterile eye pads was expired on 10/2021 3. Workshop: Sterile eye pads was expired on 10/2021 <p>Hence, a Minor NC has been raised on the matter.</p> <p><u>Genting Ayer Item Oil Mill</u></p> <p>There were no accidents in the estate reported for the year 2022 as of to date. For the year 2021 there were 1 accident reported in the estate resulting in 200 LTA days. The JKKP 6 for the accidents have been submitted to DOSH and available for verification. The JKKP 8 form for the year ending 2021 has been submitted to DOSH as well and available for verification. For the year 2020 there were 2 accident cases reported in the estate. The JKKP 8 form have been submitted to DOSH and available for verification.</p> <p><u>Genting Seri Gading Estate</u></p> <p>There were no accidents in the estate reported for the year 2022 as of to date. For the year 2021 there were 3 accidents reported in the estate resulting in 155 LTA days. The JKKP 6 for the accidents have been submitted to DOSH and available for verification. The JKKP 8 form for the year ending 2021 has been submitted to DOSH as well and available for verification. For the year 2020 there were 4</p>	
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		<p>accident cases reported in the estate. The JKPP 8 form have been submitted to DOSH and available for verification.</p> <p><u>Genting Kulai Besar Estate</u></p> <p>No accidents reported in the estate for 2022 as of to date. For 2021 there were 1 accident cases in the estate resulting in 2 days LTA. The JKPP 8 Form for year ending 2021 has been submitted to DOSH on 22/01/2022. As for 2020 there were 6 reported accident cases. The JKPP 6 form have been submitted to DOSH for respective accident cases. The JKPP 8 form for year ending 2020 have been submitted as well on 25/01/2021.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>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> <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>During field visit of spraying operation in Genting Tanah Merah Estate (GTME) and Genting Sungei Rayat Estate (GSRE) the following were found:</p> <p>Use of PPE could be further assessed its efficiency and/or suitability for following:</p> <ul style="list-style-type: none"> - Genting Tanah Merah Estate (GTME): The filter cartridge's paper of a sprayer found quite dirty compare to his work 	OFI

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		<p>partner. He mentioned that the filter paper normally uses for up to 25 days before change with new unit.</p> <ul style="list-style-type: none"> - Genting Tanah Merah Estate (GTME): The earplug worn by a mono-sprayer operator made him unable to hear clearly what the estate manager told him and caused a near-miss incident during the field visit. - Genting Kulai Besar (GKBE): The safety shoes stated in the HIRARC could be further defined to detail out the suitable type of Safety Shoes to be used by each operator in their respective operations. <p>Hence, an OFI has been raised on the matter.</p>																																
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>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 Nov 2021, Dec 2021 and Jan 2022 for the mill and all sampled estate as below.</p> <table border="1" data-bbox="1137 906 1926 1377"> <thead> <tr> <th>Operating Unit</th> <th>Month</th> <th>Total Workers</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Genting Ayer Item Oil Mill</td> <td>Nov 2021</td> <td>77</td> <td>RM 2628.50</td> </tr> <tr> <td>Dec 2021</td> <td>77</td> <td>RM 3616.50</td> </tr> <tr> <td>Jan 2022</td> <td>74</td> <td>RM 2573.30</td> </tr> <tr> <td rowspan="3">Genting Sri Gading Estate</td> <td>Nov 2021</td> <td>149</td> <td>RM 4419.00</td> </tr> <tr> <td>Dec 2021</td> <td>150</td> <td>RM 5984.50</td> </tr> <tr> <td>Jan 2022</td> <td>150</td> <td>RM 4104.00</td> </tr> <tr> <td rowspan="2">Genting Kulai Besar Estate</td> <td>Nov 2021</td> <td>121</td> <td>RM 3676.80</td> </tr> <tr> <td>Dec 2021</td> <td>118</td> <td>RM 5049.70</td> </tr> </tbody> </table>	Operating Unit	Month	Total Workers	Amount	Genting Ayer Item Oil Mill	Nov 2021	77	RM 2628.50	Dec 2021	77	RM 3616.50	Jan 2022	74	RM 2573.30	Genting Sri Gading Estate	Nov 2021	149	RM 4419.00	Dec 2021	150	RM 5984.50	Jan 2022	150	RM 4104.00	Genting Kulai Besar Estate	Nov 2021	121	RM 3676.80	Dec 2021	118	RM 5049.70	Complied
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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Occupational Injuries were recorded using the Lost Time Accident metrics as below:			Complied																																		
		<table border="1"> <thead> <tr> <th rowspan="2">OU</th> <th colspan="2">2020</th> <th colspan="2">2021</th> <th colspan="2">2022</th> </tr> <tr> <th>Case</th> <th>LTA</th> <th>Case</th> <th>LTA</th> <th>Case</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>GAIOM</td> <td>2</td> <td>68</td> <td>1</td> <td>200</td> <td>0</td> <td>0</td> </tr> <tr> <td>GSGE</td> <td>4</td> <td>21</td> <td>3</td> <td>155</td> <td>0</td> <td>0</td> </tr> <tr> <td>GKBE</td> <td>6</td> <td>27</td> <td>1</td> <td>2</td> <td>0</td> <td>0</td> </tr> </tbody> </table>				OU	2020		2021		2022		Case	LTA	Case	LTA	Case	LTA	GAIOM	2	68	1	200	0	0	GSGE	4	21	3	155	0	0	GKBE	6	27	1	2	0	0
OU	2020		2021		2022																																		
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		<p>Sampled the LTA records for 2021 for estates below.</p> <ul style="list-style-type: none"> - GTBE: Year 2021 JKKP 8; Ref. # JKKP 8/100172/2021; Date: 13/1/2022; Total LTA case: 3; Total LTA days = 25; Death: 0; Total man-hours = 427,200; Average employee: 178; Occurrence rate: 16.85; Frequency rate: 7.02; Severity rate: 58.52 - GTME: Year 2021 JKKP 8; Ref. # JKKP 8/110850/2021; Date: 28/1/2022; Total LTA case: 1; Total LTA days = 62; Death: 0; Total man-hours = 417,600; Average employee: 174; Occurrence rate: 5.75; Frequency rate: 2.39; Severity rate: 148.47 - GSRE: Year 2021 JKKP 8; Ref. # JKKP 8/109187/2021; Date: 26/1/2022; Total LTA case: 0; Total LTA days = 0; Death: 0; Total man-hours = 427,200; Average employee: 178; Occurrence rate: 0; Frequency rate: 0; Severity rate: 0 																																					
Principle 7: Protect, conserve and enhance ecosystems and the environment																																							
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.																																							

7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>The estates sampled has established IPM program. The plan was reviewed on annually basis. Among the plan established as follows:</p> <ol style="list-style-type: none"> 1. Increase barn owl box ratio but according to Oil Palm Manual. 2. Increase barn owl population: <ol style="list-style-type: none"> a. Implement 1st and 2nd generation bait – Butik S / Racumin b. Stop completely usage of 3rd generation bait – Storm etc. 3. Increase planting area for beneficial plant 4. Grass Cutting / Rotorslasher (Integrated Weed management) <p>For GSRE, the barn owl box (BOB) installation number to field hectares ratio differs among its division as following:</p> <ul style="list-style-type: none"> – Tanjung Division @ 1:10 ha – Bangka @ 1:20 ha – Sing Mah @ 1:15 ha 	Complied
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>None of species referenced in the Global Invasive Species Database and CABI.org are used for the management of IPM in the estates visited. The estates have declared this compliance in the status of IPM species invasiveness.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no land preparation in the certification unit estates by burning ever since Genting Plantations practiced zero burning.</p> <p>Genting Plantations has a policy of no open burning. As advocated, the estates practiced zero burning. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			

7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Justification of pesticides applied is available in the Sustainability Management Procedure Manual, SMP-GPB-28 Revision 06; Issue Date: April 2021. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non- target species.</p>	Complied																		
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of Pesticide/Agrochemicals used in the estate were recorded and monitored on a monthly basis and available for verification. Data were sampled as below:</p> <table border="1" data-bbox="1137 651 1930 949"> <thead> <tr> <th>Estate</th> <th>2020</th> <th>2021</th> </tr> </thead> <tbody> <tr> <td>Genting Sri Gading Estate</td> <td>1.523</td> <td>1.274</td> </tr> <tr> <td>Genting Kulai Besar Estate</td> <td>1.201</td> <td>1.179</td> </tr> <tr> <td>Genting Tebong Estate</td> <td>2.504</td> <td>-</td> </tr> <tr> <td>Genting Tanah Merah Estate</td> <td>1.659</td> <td>-</td> </tr> <tr> <td>Genting Sungei Rayat Estate</td> <td>1.376</td> <td>-</td> </tr> </tbody> </table>	Estate	2020	2021	Genting Sri Gading Estate	1.523	1.274	Genting Kulai Besar Estate	1.201	1.179	Genting Tebong Estate	2.504	-	Genting Tanah Merah Estate	1.659	-	Genting Sungei Rayat Estate	1.376	-	Complied
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Genting Plantation Sustainability Management Procedure Manual, SMP-GPB-28 Rev. 04, dated 3/7/2018. The implementation in the field is consistent with the manual.</p> <p>Genting Plantation views the use of agrochemicals in its daily operation as essential but not at the expense of its existing IPM programme. All pesticides application is carried out as per the Oil Palm Manual and SOP.</p> <p>The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of</p>	Complied																		

		chemical through implementation of Integrated Pest Management Plan. 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.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	There is no prophylactic use of pesticides in all estates visited.	Complied
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. - Minor compliance -	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. 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. Control pesticides Acephate under class III was use in trunk injection operation to control Bagworm as replacement for Monocrotophos under class Ib. The estate has acquired purchasing permit for Acephate from Dept. of Agriculture as per permit no. as follows: GKBE: JHR/2020/ACP/35(GL) dated 26/02/2020 for purchasing of 170 kg of Acephate.	Complied
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are	Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective	Complied

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	<p>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>equipment's and application equipment provided to the operators based on the PPE issuance forms.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p> <table border="1" data-bbox="1137 491 1928 1209"> <thead> <tr> <th>Estate</th> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Genting Sri Gading Estate</td> <td>PPE and Chemical Spraying Training</td> <td>11/12/2021</td> </tr> <tr> <td>Premixing, Triple Rinsing and Puncturing Training</td> <td>10/12/2021</td> </tr> <tr> <td>Chemical, Fertiliser and Lubricant Store Handling Training</td> <td>03/12/2021</td> </tr> <tr> <td>Genting Kulai Besar Estate</td> <td>Training in Chemical Calibration and Premix</td> <td>21/09/2021</td> </tr> <tr> <td rowspan="4">Genting Tebong Estate, Genting Tanah Merah Estate & Genting Sungei Rayat Estate</td> <td>Chemical mixing and PPE training</td> <td>05/12/2021</td> </tr> <tr> <td>Mist-blower spraying training</td> <td>08/12/2021</td> </tr> <tr> <td>Riparian buffer zone training</td> <td>15/12/2021</td> </tr> <tr> <td>AR-30 spraying training</td> <td>28/12/2021</td> </tr> </tbody> </table>	Estate	Training	Date	Genting Sri Gading Estate	PPE and Chemical Spraying Training	11/12/2021	Premixing, Triple Rinsing and Puncturing Training	10/12/2021	Chemical, Fertiliser and Lubricant Store Handling Training	03/12/2021	Genting Kulai Besar Estate	Training in Chemical Calibration and Premix	21/09/2021	Genting Tebong Estate, Genting Tanah Merah Estate & Genting Sungei Rayat Estate	Chemical mixing and PPE training	05/12/2021	Mist-blower spraying training	08/12/2021	Riparian buffer zone training	15/12/2021	AR-30 spraying training	28/12/2021	
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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 keeper was seen to unlock the pad-lock to open</p>	OFI																						

		<p>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> <p>During facilities visit in Genting Tebong Estate (GTBE) and Genting Sungei Rayat Estate (GSRE), the following were found:</p> <ol style="list-style-type: none"> 1. Genting Tebong Estate (GTBE): Storage of petrol could be enhanced further in-line with best practices applied. 2. Genting Sungei Rayat Estate (GSRE): Storage of Class III organophosphate pesticide (Acephate) could be enhanced further in-line with best practices applied. 3. Genting Ayer Item Oil Mill – Storage of Grease, Paint Containers and Chlorine could be enhanced further in-line with best practices applied. <p>Hence, an OFI has been raised on the matter.</p>									
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Empty pesticides containers were triple rinsed, holes punched and stored separately in the SW store. Thereafter disposal arrangement will follow accordingly as per guidelines /procedure in recyclable waste management SMPM ref SPM GPB 13 dated 11/10/2013. The current practice for the estate is delivered to G - Planter Sdn Bhd. Despatches recorded as follows;</p> <table border="1" data-bbox="1144 1225 1919 1367"> <thead> <tr> <th rowspan="2">Item</th> <th colspan="2">Quantity</th> </tr> <tr> <th>Sri Gading Estate</th> <th>Kulai Besar Estate</th> </tr> </thead> <tbody> <tr> <td></td> <td>17/01/2021</td> <td>04/06/2021</td> </tr> </tbody> </table>	Item	Quantity		Sri Gading Estate	Kulai Besar Estate		17/01/2021	04/06/2021	Complied
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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>No aerial spraying for pesticide were done in all the estates</p>	<p>Complied</p>																											

	<p>- Critical (Major) compliance -</p>		
<p>7.2.10</p>	<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>Specific Annual Medical Surveillance has been conducted in accordance to the recommendations stated in the estate’s CHRA Report, for those exposed to hazardous chemicals and fumes.</p> <p><u>Genting Sri Gading Estate</u></p> <p>Medical Surveillance has been conducted at the estate for a total of 40 workers on 20/05/2021. The workers consist of Chemical Sprayers, manurers and workshop attendants. The results indicated there were no health symptoms for all workers and they were all declared fit to work.</p> <p>Medical Surveillance was also conducted on 03/12/2021 for 4 workers in the estate. The workers consist of Chemical Sprayers and Workers attendant. The results indicated there were no health symptoms for all workers and they were all declared fit to work.</p> <p><u>Genting Kulai Besar Estate</u></p> <p>Medical Surveillance was conducted for 4 workers (Trunk Injectors) on 09/08/2021 at Poliklinik John, Kulai. The results indicated there were no health symptoms for all workers and they were all declared fit to work.</p> <p><u>Genting Tanah Merah Estate</u></p> <p>GTME Medical Surveillance 2021 by Dr. Muzaffar Salim; DOSH OHD # HQ/11/DOC/00/235; Date: 29/8/2021</p> <p><u>Genting Tebong Estate</u></p> <p>GTBE Medical Surveillance 2022 by Dr. Muzaffar Salim; DOSH OHD # HQ/11/DOC/00/235; Date: 20/10/2021</p>	<p>Complied</p>

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		<p><u>Genting Sungei Rayat Estate</u> GSRE Medical Surveillance 2022 by Dr. Hussain Bin Moiz; DOSH OHD # HQ/17/DOC/00/00005; Date: 10/2/2022</p>					
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance -</p>	<p>The Sustainability Management Procedure Manual; Doc Number: SMP-GPB-32; Revision 01; Document Date April 2021 is referred to which states: <u>Procedure for compliance requirement</u> - Subject to the relevant laws and regulations a. Pregnant and breast feeding women are transferred to safer jobs. b. Breastfeeding women shall be allowed to breastfeed up to nine (9) months before resuming jobs deemed as hazardous e.g. chemical spraying etc.</p> <p>No work on pesticides has been undertaken by female worker. All workers handling pesticides were male as sighted in the field and records.</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. - Minor compliance -</p>	<p>Both Mill and the estates in the CU had identified all wastes and sources of pollution. The Waste Management Action Plan 2022 were established to mitigate and control the identified wastes and source of pollution. The common significant environmental receptors for the estates and mill operations among others as summarized below;</p> <table border="1"> <thead> <tr> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic</td> </tr> </tbody> </table>	Receptor	Sources	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic	Complied
Receptor	Sources						
Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic						

		processes (ETP, EFB dumping)- GHG											
	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down											
	Land	Scheduled waste, domestic waste and industrial/process waste.											
<p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2022 reviewed annually. The waste generated from the mill/estates operations as shown below:</p>													
		<table border="1"> <thead> <tr> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td>Domestic waste</td> <td>rubbish from the mill/estate complex and employees' quarters</td> </tr> <tr> <td>Industrial waste</td> <td>Fiber, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table>	Type of waste	Details	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	Domestic waste	rubbish from the mill/estate complex and employees' quarters	Industrial waste	Fiber, palm kernel shell, boiler ash, scrap iron	Sewage	Sewage from housing/office complex	
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<p>The pollution identified from the mill/estate activities:</p>													
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		Odor & gases	Activities from the effluent treatment	
		Leakage of lubricant	Storage & vehicle maintenance	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>The Mill and estates had established SOP for chemical handling. The SOP of handling of chemicals is available in the following document</p> <ul style="list-style-type: none"> i. Sustainability Management Procedure Manual 2013 <ul style="list-style-type: none"> - Safe Operating Procedure. ii. Standard Operating Procedure 2013 revised dated 28/01/2022 <ul style="list-style-type: none"> - Prosedur Kerja Selamat - Prosedur membancuh Racun di PREMIX - Pengendalian Bahan Kimia - Prosedur Kerja Meracun - Pengurusan Bahan Buangan <p>a) Management and disposal of waste water 2022 has been established compiled by Assistant Engineer/Assistants/Staff.</p> <p>b) Waste Management Plan 2021 has been established prepared by SD and verified by the Assistant Engineer/ Assistants/ Manager.</p> <p>c) 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>d) 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</p>		Non-compliance

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scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The mill scheduled waste is disposed to Southern Strength Sdn Bhd registered with DOE.

Mill	Date	SW 305	SW 410	SW 409	SW 430	SW 322
GAI POM	28/12/21	0.492	0.410	0.380	-	-
GAI POM	15/07/21	1.016	-	-	-	-
GAI POM	12/01/21	-	-	-	0.113	0.113
Estate	Date	SW 312	SW 410	SW 409	SW 408	SW 306
GSGE	05/1/22	-	0.920	-	0.100	0.280
GSGE	21/07/21	-	-	-	-	0.127
GSGE	27/7/20	0.278	0.162	0.158	0.106	-
GSGE	07/7/20	-	-	0.238	0.077	0.106
	Date	SW 312	SW 410	SW 305	SW 408	SW 306
GKBE	17/01/22	0.356	0.5540	0.3349	0.095	0.0344
GKBE	17/07/21	-	-	0.2679	-	0.0172
GKBE	16/01/21	0.0019	0.0230	0.0116	0.002	0.0096

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		<p>There were delays in SW despatch in 2020 in view of the MCO compliance via email from Sustainability Dept on the letter of extension dated 28/06/21 on restriction of collection due to facility issue . All SW collectors have renewal of license expiring on 30/04/2022.</p> <p>For GTBE, Inventory of scheduled waste was available dated February 2022 as per Inventory Number: 21016033017VSG61H22021.</p> <p>The waste category code generated in the estate was SW102, 103, 110, 305, 306, 312, 403, 404, 408, 409 and 410.</p> <ul style="list-style-type: none"> a. Sample on SW 404, last disposal was on 20/10/2021. b. SW 410 2021020918IKSED5 0.0243 dated 09/02/2021 c. SW 306 2021020919P45DXY 0.345 dated 09/02/2021 <ul style="list-style-type: none"> 1. For GTME, the SW 404 was already disposed to Kualiti Alam Sdn Bhd, dated 21/10/2021, with total 0.6 kg. However, during verification on clinical waste, sighted SW 404 (clinical waste) in dustbin at back of the clinic. Thus, Minor NC was raised during this audit. 2. In GSRE, sighted 11 oil drums (SW 409) at recycle waste store and not stored in Schedules waste store as per SMP-GPB-11 Rev 01 dated 11/06/2018. <i>"All SWs are to be orderly and safely stored in an appropriate designated SWs store pending disposal."</i> <p>Thus, Minor NC was raised during this audit.</p> <p>Domestic waste for the operating units in CU was disposed as follows;</p>	
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Estate	Landfill site	Remarks
Sri Gading Estate	Internal P87C	Collection 2/3 x week
Kulai Besar Estate	MPD Kulajaya	Collection 2/3 x week
GAI POM	Internal P99A	Collection 2/3 x week

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

- a) Landfill/domestic waste management GBP 12 dated 01/12/14
- b) Scheduled waste management GBP 11 dated 11/08/2020
- c) Recyclable waste management GBP 13 dated 11/10/2013

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

- a) Sisa pepejal komersial / pembinaan
- b) Sisa pepejal isi rumah / perindustrian.
- c) Sisa pepejal keinstitusian
- d) Sisa pepejal import / awam.

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

		<p>water contamination. The site disposal area (landfill area) is shown and marked in the estate map.</p> <p>The estate also identified the types of domestic waste;</p> <ul style="list-style-type: none"> a) Sisa baki (Home domestic) b) Sisa pukal e.g. old furnitures, electrical appliances. c) Sisa kitar semula (Recycled). <p>Inside the Management Plan the estate has included among others.</p> <ul style="list-style-type: none"> a) Identification of scheduled waste/ domestic waste. b) Process dispose domestic waste to the estate landfill. <p>The estates also maintained records of source identification source and type of scheduled waste.</p>	
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>GPB practices of zero burning is enforced and elaborated in the Group Zero Burning Policy dated 10/08/2011 signed by the Group President & Chief Operating Officer and also included in the following guidelines;</p> <ul style="list-style-type: none"> a) Sustainability Management Procedure Manual 2013 <ul style="list-style-type: none"> - Safe Operating Procedure. b) Standard Operating Procedure 2013 revised dated 28/1/22 <ul style="list-style-type: none"> - Prosedur Kerja Selamat - Prosedur membancuh Racun di PREMIX - Pengendalian Bahan Kimia - Prosedur Kerja Meraacun - Pengurusan Bahan Buangan <p>The operating units adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers</p>	Complied

		<p>there is no open burning being practiced in the estates. Both the estates had replanting program spanned over the forthcoming years as shown in 3.1.2. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
<p>7.4.1</p>	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -</p>	<p>The estates and mills are guided by the following manuals</p> <ul style="list-style-type: none"> a) Genting Plantations Oil Palm Manual OPM issued on 9/11/99 b) Sustainability Management Procedure Manual 1/8/13 revised in 28/01/2022. c) OSH Manual dated 01/01/2010. d) Environmental Control Procedure – 01/9/2018 e) Store Operating Manual – 2014 f) Standard Operating Procedure West Malaysia Estates 17/1/2011. g) Jobs description - 2012 h) Pictorial Safety Standards and Security Guidelines (PSS). i) Laboratory Process Control Manual <p>The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections</p> <ul style="list-style-type: none"> a) OPM No 7. Manuring of oil palm b) OPM no 13. Managing difficult soils <p>The CU 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</p>	<p>Complied</p>

		<p>audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOP.</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, clarification, depericarping (nut polishing) station, effluent, laboratory, workshop, despatches etc.</p> <p>All the estates and mill operations were guided through the manuals and SOP.</p> <ul style="list-style-type: none"> a) The procedures as documented in the GPB OPM were disseminated to the staff/workers through morning briefings and training. b) The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. c) The documents included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. d) Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment. 	
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>The internal Agronomist from Genting Plantations Research Centre visits estates to perform foliar sampling prior to the fertilizer recommendation for the forthcoming year.</p>	Complied

- a) Leaf and soil nutrient analysis are a common methodology used in the diagnosis of fertilizer requirements in oil palms.
- b) Foliar analysis reports were then issued to the estates for the program establishment and application. This includes the order of fertilizer and workforce/machine planning.
- c) Agronomic assessment and fertilizer recommendation formulate the FY2022 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been were carried out in all estates. The latest being:

Estate	Report Date	Report No
GSGE	09/02/2022	SGE 02/22
GKBE	08/06/2021	PR19/2021

- d) Soil sampling was carried out accordingly and analysis is made yearly on different fields. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen.
- e) Soil analysis for PH, Org C, Total N, Total P, Avail P, Exchange K, Exchange Ca & Exchange Mg was carried out on a year cycle basis with the recent carried out as follows:

Estate	Report No	Report Date
GSGE	GSGE soil report	23/11/2021
GKBE	SR29/2018	11/12/2018

<p>7.4.3</p>	<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. - 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"> a) EFB application in designated fields at dosage of 20-40 mt/ha applied in inter rows subject to Agronomist recommendations. Sampling on EFB application in GTBE was 7,688 mt for 305.68 ha, GSRE record application of EFB total 6897.4 mt for 304.84 ha and for GTME record application EFB total was 28795.05 mt for 1433.20 ha. b) Cut frond are stacked in between the palms rows left to discompose. 	<p>Complied</p>																								
<p>7.4.4</p>	<p>Records of fertiliser inputs are maintained. - 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> <ul style="list-style-type: none"> a) Records of programs and applications of fertilizers were reviewed by the auditors. b) Review of the records revealed that the actual fertilizers applied in 2021 was in line with the program. c) The following fertilizers were applied in the estates on recommendation by the Agronomist GPRC among others; <table border="1" data-bbox="1205 1091 1928 1383"> <thead> <tr> <th colspan="4">Genting Sri Gading Estate</th> </tr> <tr> <th colspan="2">Fertilizer</th> <th>Kg/palm</th> <th>application month</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Urea</td> <td>1.00</td> <td>Feb</td> </tr> <tr> <td>2</td> <td>NKB</td> <td>1.75</td> <td>Mac</td> </tr> <tr> <td>3</td> <td>FMP - MgO</td> <td>2.25</td> <td>April</td> </tr> <tr> <td>4</td> <td>B 48</td> <td>0.10</td> <td>Oct</td> </tr> </tbody> </table>	Genting Sri Gading Estate				Fertilizer		Kg/palm	application month	1	Urea	1.00	Feb	2	NKB	1.75	Mac	3	FMP - MgO	2.25	April	4	B 48	0.10	Oct	<p>Complied</p>
Genting Sri Gading Estate																											
Fertilizer		Kg/palm	application month																								
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		<table border="1" data-bbox="1205 363 1930 810"> <tr> <td>5</td> <td>Boiler Ash</td> <td>2.50</td> <td>May</td> </tr> <tr> <td colspan="4">Genting Kulai Besar Estate</td> </tr> <tr> <td colspan="2">Fertilizer</td> <td>Kg/palm</td> <td>application month</td> </tr> <tr> <td>1</td> <td>NKB (AC)</td> <td>1.75</td> <td>Feb</td> </tr> <tr> <td>2</td> <td>FMP</td> <td>1.50</td> <td>April</td> </tr> <tr> <td>3</td> <td>AC 25</td> <td>1.25</td> <td>Aug</td> </tr> <tr> <td>4</td> <td>B48</td> <td>0.10</td> <td>Nov</td> </tr> <tr> <td>5</td> <td>Yield booster</td> <td>0.50</td> <td>June</td> </tr> </table> <p data-bbox="1137 865 1930 1008">The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections a) OPM No 7. Manuring of oil palm b) OPM no 13. Managing difficult soils</p>	5	Boiler Ash	2.50	May	Genting Kulai Besar Estate				Fertilizer		Kg/palm	application month	1	NKB (AC)	1.75	Feb	2	FMP	1.50	April	3	AC 25	1.25	Aug	4	B48	0.10	Nov	5	Yield booster	0.50	June	
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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. - Critical (Major) compliance -</p>	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was available. There were no other problem soils (e.g. podzols and acid sulphate soils) in the estates. The soil map is prepared by Soil maps are prepared by Genting Plantations Research Centre.</p> <p>In GTME, the steep terrain area available for 1.3% (22.96 ha) and no fragile soil in GTME as per verification on soil analysis report from Param Agricultural Soil Survey (M) Sdn Bhd. Dated July 2021. From the mapping of topography in GTME the data as per below:-</p>	Complied																																

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Degree	Description	Ha	%
0-2	Level	160.81	9.0
2-6	Undulating	753.99	42.2
6-12	Rolling	777.42	43.5
12-20	Hilly	61.75	3.5
20-25	Somewhat steep	9.32	0.5
25-30	Steepland	22.96	1.3

Sampled other 2 estates soil map to include soil types as below.

	Soil type	Sri Gading	Kulai Besar
1	Rengam	9.10	67.56
2	Tai Tak	38.30	-
3	Btg Merbau	5.20	-
4	Tawar	14.80	-
5	Holyrood	1.10	-
6	Lintang	3.80	-
7	Bkt Tuku	0.90	-
8	Banar	3.50	-
9	Sg Buloh	3.10	-

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		10	Briah	1.40	-	
		11	Selangor	1.10	-	
		12	Sabrang	3.50	-	
		13	Jawa	11.30	-	
		14	Linau	2.00	-	
		15	Segamat Katong	-	32.29	
		16	Moderate/steep	0.90	0.15	
			Total	100.00	100.0	
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Like all GPB estates, all the estates visited continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by a Policy is available titled as 'Sustainability Policy dated 03/08/2009 signed by President / Group Chief Operating Officer. The content of the Policy among others includes the following;</p> <ul style="list-style-type: none"> a) Compliance with all related guidelines and regulatory laws. b) Implementation of GAP as stated in OPM /SPM. c) Implement suitable remedial to reduce impact to the environment. <p>Other guidelines were also shown in the following documents among others;</p> <ul style="list-style-type: none"> a) Steep Land Management SMP 10 dated 18/03/2021 				Complied

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b) Procedure new planting /new development SMP 27 dated 16/03/2020.

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 *mucuna bracteata* had been planted along crucial slopes by management. Large areas with *neprolepis biserrata* in the inter rows were sighted during the visit. The slope maps were provided by the GPRC providing the terrain classification with details shown below.

Terrain degree	Description	GSGE	GKBE
0-2	level	31.50	24.14
2-6	undulating	15.90	61.17
6-12	rolling	52.30	13.98
12-20	hilly	0.00	0.71
20-25	Mode steep	0.30	0.00
>25	Steep land	0.00	0.00
Total		100.0	100.0

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7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	This compliance being addressed in the Sustainable Policy - "Slope and River Protection" dated 03/08/2009 signed by President / Group Chief Operating Officer stating the following among others; "Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly".	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Soil surveys are made and available in a soil map for both the estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.	Complied
7.6.2	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 -	GPB Group Estates had no planting on areas of more than 25 degree. Plantings on steep slope are either avoided or minimized.	Complied
7.6.3	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 the estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates. Details as per 7.5.1 and 7.5.2.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	No new planting on peat was conducted in the Certification Units since 15/11/2018.	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	Genting Plantations Berhad has reported the Peat Inventory as per RSPO Peat Inventory Genting Plantations Bhd v2 (Malaysia) with	Complied

	<p>PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -</p>	<p>records of 338.03 ha of peat area was identified in Genting Sungei Rayat Estate, Sing Mah Division.</p>											
<p>7.7.3</p>	<p>(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -</p>	<p>The estate monitor the subsidence level, water level and water pH on monthly basis. Reviewed the monitoring records dated 21/01/2021. The peat subsidence also been monitoring 240 ha per each point every year. The latest record of monitoring as per below:-</p> <table border="1" data-bbox="1137 708 1926 954"> <thead> <tr> <th>Peat Subsidence</th> <th>Since 2015</th> </tr> </thead> <tbody> <tr> <td>P98</td> <td>30 cm</td> </tr> <tr> <td>P95</td> <td>33.8 cm</td> </tr> <tr> <td>P08A</td> <td>15cm</td> </tr> <tr> <td colspan="2">Last data was on 31/12/2021</td> </tr> </tbody> </table>	Peat Subsidence	Since 2015	P98	30 cm	P95	33.8 cm	P08A	15cm	Last data was on 31/12/2021		<p>Complied</p>
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<p>7.7.4</p>	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>The water and ground cover management programme is documented in the GPB SMP 15 (Water Management in Inland, Costal and Peat lands) issued on 12/11/2014. Details are described in 7.8.1. individual estate and mill had their respective water management plan mainly to monitor among others the following;</p> <ol style="list-style-type: none"> Bulk of the supply in view of the location are from SAJ/internal treatment for both mill and estate. 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 Reuse/recycle waste water. 	<p>Complied</p>										

		<p>As for Genting Sungei Rayat Estate, the estate has established water and ground cover management programme and documented in Water Management Plan. The plan focusus on Maintaining water level, Control subsidence and reduce CO2 emission, Drain management and flushing and desilting.</p>			
<p>7.7.5</p>	<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>Replanting will be conducted on 2024 (field P99C - 33.84 Ha) in Sing Mah Div, Genting Sungei Rayat Estate.</p> <p>The latest Drainability assessment conducted on Jan 2021 prepared by Genting Plantation Research Centre. From the report conclusion and data, show that the replanting can proceed. However, the report could be further improved to contain 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.</p>	<p>OFI</p>		
<p>7.7.6</p>	<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>In Sing Mah Div under GSRE, there are 338.05 Ha peat area. From the Peat management plan dated 11/2/2022 and site verification, the management ensure to maintain the water level by install the piezometer 1 point: 120 ha and this monitored by every month. This to ensure the water level under 50 -75cm. The peat subsidence also been monitoring 240 ha per each point every year. The latest record of monitoring as per below:-</p> <table border="1" data-bbox="1137 1311 1930 1359"> <tr> <td data-bbox="1137 1311 1532 1359">Peat Subsidence</td> <td data-bbox="1532 1311 1930 1359">Since 2015</td> </tr> </table>	Peat Subsidence	Since 2015	<p>Complied</p>
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7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	No peatland was set aside under for peatland conservation areas as of now in the estates. All peat area been planted with oil palm verified during site verification at Field 99A in Sing Mah Div. Hence this indicator is not applicable.	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,</p> <p>d) desilting of water reservoir to retain the reservoir optimal capacity.</p> <p>e) The action plan in event of draught/water pollution.</p> <p>The estates similarly possessed the following water management plan. Among others containing the following initiatives.</p>	Complied								

Source	Activity	Threat	Action Plan
Reservoir/ pond/ Rain	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer zone as non-spraying activities.
	General Upkeep	Pollution Draught Wastage	Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.
	Line site	Pollution Draught Wastage	Every house is supplied with containers. Awareness on water usage efficiency. Outsource from neighboring estates.
	Drain upkeep	Interruption water flow at drainage system.	Periodic desilting Building of sand bags at specific points to contain water (weirs)
		Water pollution	Prohibit workers from activities at water source Drinking water analysis. Monitor condition of septic tank

			Adhere SW management procedure to avoid pollution caused by SW.																						
Water Management Plan review date was sighted and verified with records as follows;.																									
<table border="1"> <thead> <tr> <th data-bbox="1146 655 1520 707">Estate/Mill</th> <th data-bbox="1520 655 1740 707">Review date</th> <th data-bbox="1740 655 1933 707">Issues</th> </tr> </thead> <tbody> <tr> <td data-bbox="1146 707 1520 758">GPB Sri Gading Estate</td> <td data-bbox="1520 707 1740 758">12/01/2022</td> <td data-bbox="1740 707 1933 758">NIL</td> </tr> <tr> <td data-bbox="1146 758 1520 809">GPB Kulai Besar Estate</td> <td data-bbox="1520 758 1740 809">16/01/2022</td> <td data-bbox="1740 758 1933 809">NIL</td> </tr> <tr> <td data-bbox="1146 809 1520 860">Genting Ayer Item POM</td> <td data-bbox="1520 809 1740 860">17/01/2022</td> <td data-bbox="1740 809 1933 860">NIL</td> </tr> <tr> <td data-bbox="1146 860 1520 911">Genting Sungei Rayat Estate</td> <td data-bbox="1520 860 1740 911">Jan 2022</td> <td data-bbox="1740 860 1933 911">NIL</td> </tr> <tr> <td data-bbox="1146 911 1520 962">Genting Tanah Merah Estate</td> <td data-bbox="1520 911 1740 962">Jan 2022</td> <td data-bbox="1740 911 1933 962">NIL</td> </tr> <tr> <td data-bbox="1146 962 1520 1007">Genting Tebong Estat</td> <td data-bbox="1520 962 1740 1007">Jan 2022</td> <td data-bbox="1740 962 1933 1007">NIL</td> </tr> </tbody> </table>					Estate/Mill	Review date	Issues	GPB Sri Gading Estate	12/01/2022	NIL	GPB Kulai Besar Estate	16/01/2022	NIL	Genting Ayer Item POM	17/01/2022	NIL	Genting Sungei Rayat Estate	Jan 2022	NIL	Genting Tanah Merah Estate	Jan 2022	NIL	Genting Tebong Estat	Jan 2022	NIL
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The Mill Identification & Management of Waste Water 2022 among others as summarized below;																									
<table border="1"> <thead> <tr> <th data-bbox="1137 1133 1272 1243">Location</th> <th data-bbox="1272 1133 1568 1243">Waste water produced</th> <th data-bbox="1568 1133 1749 1243">Treatment/containment</th> <th data-bbox="1749 1133 1933 1243">Reuse/recycle/disposal method</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 1243 1272 1377">Processing stations</td> <td data-bbox="1272 1243 1568 1377">Clarification condensate Sterilizer condensate</td> <td data-bbox="1568 1243 1749 1377">Oil recovery/ETP</td> <td data-bbox="1749 1243 1933 1377">Recover into system</td> </tr> </tbody> </table>					Location	Waste water produced	Treatment/containment	Reuse/recycle/disposal method	Processing stations	Clarification condensate Sterilizer condensate	Oil recovery/ETP	Recover into system													
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			Hydro cyclone condensate Mill floor cleaning water			
		Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain	
		Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain	
		Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain	
		Lab	Cleaning water	Process drain	Monsoon drain	
		Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.	
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 GPB SMP 14 Sustainability</p>				Complied

Manual revised dated 16/03/2020. The buffer zones established are as follows:

	River width	Buffer zone
1	>40 meters	50 meters
2	20 - 40 meters	40 meters
3	10 - 20 meters	20 meters
4	5 - 10 meters	10 meters
5	< 5 meters	5 meters

Buffer zones were protected. Areas visited for the estates as tabled below;

Estate/Mill	Location	Field no
G. Sri Gading	Sg Sengkuang	P85C
G. Kulai Besar	Sg Hulu	P11A
GAIOM	Sg Linau	GSRE P17B/P08B

Prevention is made especially during the manuring activities. GPB reviewed the environmental performances during the monthly EPMC Environmental Performance Monitoring Committee. Sighted minutes of meeting GAIPOM dated 19/01/2022 and 29/12/2021 EPMC meeting among others discussed the following issues.

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- a. Kualiti & Alam Sekitar
- b. Effluent performance
- c. Competent person CePSO / CePWaM /CePPOME
- d. DOE external audit presentation
- e. Boiler emission quality

The estate initiated meeting on environmental dated 23/08/2021

The mill made an monthly water samples at 2 points in the river nearby i.e hulu & hilir Sg Linau source for the mill water consumption.. Similar sampling (2x/year) for the estates was made in respective waterways with results as shown below. No major issues were noted/recorded. Analysis made by Envilab Sdn Bhd SAMM 298 certified.

GAI POM			11/01/22		05/08/21	
	Parameter	unit	Hulu	Hilir	Hulu	Hilir
1	PH	-	5	5	4.2	4.1
2	BOD	mg/L	8	6	5	6
3	COD	mg/L	152	142	109	104
4	T Solids	mg/L	140	110	120	120
5	S Solids	mg/L	16	16	<4	<4
6	O & G	mg/L	ND	ND	ND	ND
7	A Nitrogen	mg/L	0.2	0.2	ND	ND

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8	T Nitrogen	mg/L	1.0	1.0	ND	ND
Sri Gading Estate - Water ways to Sg Sengkuang11/10/21						
	Parameter	unit	A1	A2	A3	A4
1	PH	-	6.5	5.1	6.0	4.6
2	BOD	mg/L	0.00	0.00	0.00	0.00
3	COD	mg/L	100	99	103	99
4	DO	mg/L	0.00	0.00	0.00	0.00
5	P	mg/L	0.01	0.01	0.01	0.01
6	A Nitrogen	mg/L	0.00	0.00	0.00	0.00
Kulai Besar Estate Water ways to Sg Hulu - Sept 2021						
	Parameter	unit	KBEP1	KBEP2	KBNP1	KBNP2
1	PH	-	7.0	6.2	5.6	5.7
2	BOD	mg/L	0	0	3	0
3	COD	mg/L	3	3	6	3
4	DO	mg/L	5	6	6.8	7.0
5	P	mg/L	3.14	2.32	2.32	2.86
6	A Nitrogen	mg/L	0.00	0.00	0.00	0.00

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		<p>The monitoring of water outgoing been conducted 6 monthly basis in GTBE. The result was available as per sampling in GTBE (ref no: WR07/2022) dated 3/2/2022 as per below:-</p> <table border="1" data-bbox="1137 475 1926 826"> <thead> <tr> <th>Parameter</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>7.5</td> </tr> <tr> <td>BOD</td> <td>0.98</td> </tr> <tr> <td>Suspended Solid</td> <td>34</td> </tr> <tr> <td>AN mg/l</td> <td>ND</td> </tr> <tr> <td>Phosphorus mg/l</td> <td>0.06</td> </tr> <tr> <td>DO</td> <td>10</td> </tr> </tbody> </table> <p>This water analysis been conducted at Chemical Laboratory (M) Sdn Bhd. For GTME, (ref. no; WR08/2021) dated 18/9/2021</p> <p>The Mill utilizes water consumption through own water treatment with 2x/annual sampling for quality detection. Samples were sent to Spectrum Laboratory Sdn Bhd for analysis of pH, turbidity, color and metal content. Results dated 01/01/2022 and 28/06/2021 were sighted and verified. All parameters conform to WHO guidelines.</p>	Parameter	Result	pH	7.5	BOD	0.98	Suspended Solid	34	AN mg/l	ND	Phosphorus mg/l	0.06	DO	10	
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DO	10																
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. No over flow was observed, and flow meter reading was recorded daily. The mill monitors the effluent and submits to DOE through '<i>Borang Penyata Suku Tahunan</i>'.</p> <table border="1" data-bbox="1137 1311 1926 1369"> <thead> <tr> <th>Sample Date</th> <th>Std</th> <th>5/10/21</th> <th>2/11/21</th> <th>7/12/21</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Sample Date	Std	5/10/21	2/11/21	7/12/21						Complied				
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		<table border="1" data-bbox="1137 363 1928 483"> <tr> <td>PH</td> <td>5.-9.</td> <td>9.00</td> <td>9.00</td> <td>9.00</td> </tr> <tr> <td>BOD</td> <td>500</td> <td>252</td> <td>120</td> <td>87</td> </tr> </table> <table border="1" data-bbox="1137 515 1928 699"> <tr> <td>Sample Date</td> <td>Std</td> <td>6/10/20</td> <td>3/11/20</td> <td>1/12/20</td> </tr> <tr> <td>PH</td> <td>5.-9.</td> <td>8.70</td> <td>8.70</td> <td>9.00</td> </tr> <tr> <td>BOD</td> <td>500</td> <td>60</td> <td>47</td> <td>80</td> </tr> </table> <p data-bbox="1137 730 1928 930">The Mill license was for land application and the requirement is for the BOD to be less than 500 mg/L license no 00366 validity 01/07/2021-30/06/2022. The results from final discharge were compliance within parameter limit. Analysis was made using the services of Envilab Sdn Bhd accredited with MS ISO/IEC 17025 Testing SAMM No 298.</p>	PH	5.-9.	9.00	9.00	9.00	BOD	500	252	120	87	Sample Date	Std	6/10/20	3/11/20	1/12/20	PH	5.-9.	8.70	8.70	9.00	BOD	500	60	47	80	
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording (water usage per mt in 2021 of fresh fruit bunches (FFB) below; Base line is 1.5 ratio</p> <table border="1" data-bbox="1144 1078 1921 1374"> <thead> <tr> <th>2021</th> <th>Water m3</th> <th>FFB /mt</th> <th>Water /FFB</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>21351</td> <td>12985</td> <td>1.64</td> </tr> <tr> <td>Feb</td> <td>24739</td> <td>13821</td> <td>1.79</td> </tr> <tr> <td>Mac</td> <td>26544</td> <td>18139</td> <td>1.46</td> </tr> <tr> <td>Apr</td> <td>29271</td> <td>17593</td> <td>1.66</td> </tr> <tr> <td>May</td> <td>28453</td> <td>17525</td> <td>1.62</td> </tr> </tbody> </table>	2021	Water m3	FFB /mt	Water /FFB	Jan	21351	12985	1.64	Feb	24739	13821	1.79	Mac	26544	18139	1.46	Apr	29271	17593	1.66	May	28453	17525	1.62	Complied	
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	June	30313	16264	1.86
	July	28073	17239	1.63
	Aug	25214	16890	1.49
	Sept	24428	16676	1.46
	Oct	23122	16971	1.36
	Nov	20794	15603	1.33
	Dec	20667	15969	1.29
	Total	302969	195680	1.55
	There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc.			

Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised

7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2022. The document was reviewed/updated on 08/01/2022. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:	Complied						
		<table border="1"> <thead> <tr> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>Backhoe tractor/ Machines</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel</td> </tr> </tbody> </table>	Target	Objective	Action plan	Backhoe tractor/ Machines	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel	
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		<p>Van / Supervisory vehicle</p>	<p>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</p>	<p>To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.</p>																																																														
		<p>Electrical supply</p>	<p>To reduce reliance on gen-sets for power supply</p>	<p>Utilization of TNB sources</p>																																																														
		<p>The utilization of fossil fuel in 2021 is being monitored with records shown below: Baseline is 1.5-2.0 The mill diesel utilization in 2021 is 26045 mt which tallies with the GHG declared figures.</p>																																																																
		<table border="1"> <thead> <tr> <th>Year</th> <th>GAIOM</th> <th>GSGE</th> <th>GKBE</th> <th>GTBE</th> <th>GSRE</th> <th>GTME</th> </tr> </thead> <tbody> <tr> <td rowspan="2">2018</td> <td>29807</td> <td>93960</td> <td>68490</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>0.192</td> <td>1.52</td> <td>1.55</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td rowspan="2">2019</td> <td>53430</td> <td>91537</td> <td>67674</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>0.199</td> <td>1.89</td> <td>1.75</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td rowspan="2">2020</td> <td>56944</td> <td>87794</td> <td>76432</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>0.141</td> <td>1.57</td> <td>2.05</td> <td>1.57</td> <td>1.35</td> <td>2.18</td> </tr> <tr> <td rowspan="2">2021</td> <td>26045</td> <td>82976</td> <td>71929</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>0.188</td> <td>1.50</td> <td>2.24</td> <td>1.96</td> <td>1.53</td> <td>2.01</td> </tr> </tbody> </table>					Year	GAIOM	GSGE	GKBE	GTBE	GSRE	GTME	2018	29807	93960	68490	-	-	-	0.192	1.52	1.55	-	-	-	2019	53430	91537	67674	-	-	-	0.199	1.89	1.75	-	-	-	2020	56944	87794	76432	-	-	-	0.141	1.57	2.05	1.57	1.35	2.18	2021	26045	82976	71929	-	-	-	0.188	1.50	2.24	1.96	1.53	2.01	
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		<p>The estates and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running.</p> <p>Performance variation in view of several factors i.e.</p> <ul 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 <p>There is no opportunity for the estate to capitalize the utilization of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation. The estate adopted the following practices in reducing diesel consumption in the daily operations.</p> <table border="1" data-bbox="1153 845 1915 1077"> <tr> <td>Management Plan</td> <td>Timeline</td> <td>PIC</td> </tr> <tr> <td>Monitoring of diesel usage in FFB transportation</td> <td>On-going</td> <td>AEM</td> </tr> <tr> <td>Engine OFF when not in operations</td> <td>On-going</td> <td>AEM</td> </tr> <tr> <td>Training session to PIC</td> <td>Schedule</td> <td>AEM</td> </tr> </table> <p>The Mill similarly had a reduction plan of fuel via the following initiative;</p> <table border="1" data-bbox="1153 1197 1915 1380"> <tr> <td>Management Plan</td> <td>Timeline</td> <td>PIC</td> </tr> <tr> <td>Monitoring of diesel usage in internal transportation</td> <td>On-going</td> <td>AEM</td> </tr> <tr> <td>Engine OFF when not in operations</td> <td>On-going</td> <td>AEM</td> </tr> </table>	Management Plan	Timeline	PIC	Monitoring of diesel usage in FFB transportation	On-going	AEM	Engine OFF when not in operations	On-going	AEM	Training session to PIC	Schedule	AEM	Management Plan	Timeline	PIC	Monitoring of diesel usage in internal transportation	On-going	AEM	Engine OFF when not in operations	On-going	AEM	
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		<p>By maintenance of the boiler & machinery to ensure at optimum level to monitor diesel usage</p>	On-going	AME	
		<p>provide training to workers regarding reduce fuel and diesel usage for boiler.</p>	On-going	AME	
		<p>A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2022 identified in the following</p> <ul style="list-style-type: none"> a) Environmental Aspect Identification Summary FY 2022 reviewed accordingly. b) Environmental Impact Evaluation Summary FY 2022 reviewed accordingly. c) Renewable energy usage & diesel consumption 2022 was established and monitored by monthly basis. 			
<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>					
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Identification of significant pollutants and greenhouse gas (GHG) emissions has been done e.g. POME, diesel/fuel and fertilizer. Their usage has been recorded and documented at each of the operating units. The plan to reduce or minimise the GHG emission has been established and incorporated with its plan to prevent pollution. Among the action plans were:</p> <ul style="list-style-type: none"> • To optimise the usage of diesel • To ensure efficiency of ETP by not processing FFB more than licensed limit • To conduct training to the employees on chemical handling 			Complied

		Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was accurate.					
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit.	Not Applicable				
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>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. which covers estate (Latest 18/01/2022) and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1137 1062 1933 1289"> <thead> <tr> <th>Environmental Receptors</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>Air</td> <td>Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td> </tr> </tbody> </table>	Environmental Receptors	Source	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).	Complied
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		<table border="1"> <tr> <td data-bbox="1142 368 1361 534">Water</td> <td data-bbox="1361 368 1930 534">Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> </table>	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down																			
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Land	Land – Scheduled waste, domestic waste and industrial / process waste.																						
		<p>GAIOM has conducted boiler stack sampling for each of the boiler stack. Chimney Gas Emission monitoring report (EIH2112(027)/GOMSB(BOI6) dated 07/12/2021 and (EIH2107(032)/GOMSB(BOI4) dated 07/12/2021 This assessment conducted by Envilab Sdn Bhd. The result as per below:-</p> <table border="1"> <thead> <tr> <th data-bbox="1142 850 1328 903">Parameter</th> <th data-bbox="1328 850 1516 903">Chimney 6</th> <th data-bbox="1516 850 1704 903">Chimney 4</th> <th data-bbox="1704 850 1892 903">DOE Limits</th> </tr> </thead> <tbody> <tr> <td data-bbox="1142 903 1328 1018">Total particulate matter</td> <td data-bbox="1328 903 1516 1018">43</td> <td data-bbox="1516 903 1704 1018">108</td> <td data-bbox="1704 903 1892 1018">150 mg/m3</td> </tr> <tr> <td data-bbox="1142 1018 1328 1066">Sum of SO2</td> <td data-bbox="1328 1018 1516 1066">184</td> <td data-bbox="1516 1018 1704 1066">233</td> <td data-bbox="1704 1018 1892 1066">400 mg/m3</td> </tr> <tr> <td data-bbox="1142 1066 1328 1114">Sum of NO</td> <td data-bbox="1328 1066 1516 1114">214</td> <td data-bbox="1516 1066 1704 1114">263</td> <td data-bbox="1704 1066 1892 1114">400 mg/m3</td> </tr> <tr> <td data-bbox="1142 1114 1328 1201">Carbon Monoxide</td> <td data-bbox="1328 1114 1516 1201">175</td> <td data-bbox="1516 1114 1704 1201">245</td> <td data-bbox="1704 1114 1892 1201">1000 mg/m3</td> </tr> </tbody> </table> <p>The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS during the audit. The system was found to be in functional condition. Data from the stack is connected online to DOE office.</p>	Parameter	Chimney 6	Chimney 4	DOE Limits	Total particulate matter	43	108	150 mg/m3	Sum of SO2	184	233	400 mg/m3	Sum of NO	214	263	400 mg/m3	Carbon Monoxide	175	245	1000 mg/m3	
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		<p>Boiler smoke emission data are within the DOE limit. An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent.</p> <p>The Pollution Prevention Plan and Waste Management Action Plan 2022” – is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly. Among others actions taken by the CU were:</p> <ul style="list-style-type: none"> a) Scheduled wastes – disposed to Southern Strength Sdn Bhd and Kualiti Alam Sdn Bhd. b) Domestic wastes are disposed to MDP landfill c) Full compliance to zero burning practices. d) Installation of Biogas Plant 2022 and 2023 in 2 phases. <p>The environmental issues are discussed together in the quarterly ESH meeting 4x/year. The agenda discussed among others as follows;</p> <ul style="list-style-type: none"> a) matters arising b) performance of environment compliance c) report on environmental pollution d) self-compliance checklist performance e) effluent treatment /clean air / scheduled waste f) audit report on RSPO/MSPO g) Domestic waste issues 	
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		<p>Minutes of mill EPMC meeting dated 19/01/2022 and 29/12/2021 was sighted and verified. In addition, environmental issues were also discussed direct or indirectly during the management meeting the weekly muster. EPMC meeting among others discussed the following issues.</p> <ul style="list-style-type: none"> a. Kualiti & Alam Sekitar b. Effluent performance c. Competent person CePSO / CePWaM /CePPOME d. DOE external audit presentation e. Boiler emission quality <p>The estates initiated meeting on environmental dated 23/08/2021.</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 in the Estates CU by burning ever since Genting Plantations practice zero burning as per the policy in the Zero Burning Policy dated 10/08/2011 signed by the President & Chief Operating Officer. Therein stating</p> <ul style="list-style-type: none"> a) No open burning of any kind in all OU b) All types of waste products disposed appropriately c) Limited open burning allowed for cooking and religious purposes under appropriate supervision. <p>In the 2021 replants visited during the audit in GKBE it was evident that all palms were felled, shredded, windrowed and left to decompose.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -</p>	<p>There was no land preparation in the Estates CU by burning ever since Genting Plantations practice zero burning as per the policy in the Zero Burning Policy dated 10/08/2011 signed by the President & Chief Operating Officer. Therein stating</p>	Complied

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		<p>a) No open burning of any kind in all OU b) All types of waste products disposed appropriately c) Limited open burning allowed for cooking and religious purposes under appropriate supervision.</p> <p>In the 2021 replants visited during the audit in GKBE it was evident that all palms were felled, shredded, windrowed and left to decompose. The estate adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. There is a fire ERP team established by the estates and mill.</p>																						
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -</p>	<p>GPB engaged smallholders on the fire prevention and control measures. This was mentioned in the stakeholder meeting and various mode via feedback given by the members.</p> <table border="1" data-bbox="1144 890 1928 1319"> <thead> <tr> <th>Estate/Mill</th> <th>Date</th> <th>Attendees</th> <th>Mode</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Genting Sri Gading Estate</td> <td>16/12/2021</td> <td>12 internal</td> <td>meeting</td> </tr> <tr> <td>21/12/2021</td> <td>43 external</td> <td>Feedback</td> </tr> <tr> <td>30/10/2020</td> <td>43 external</td> <td>Feedback</td> </tr> <tr> <td rowspan="2">Genting Kulai Besar Estate</td> <td>31/12/2022</td> <td>40 external</td> <td>Feedback</td> </tr> <tr> <td>20/12/2021</td> <td>40 external</td> <td>Feedback</td> </tr> </tbody> </table>	Estate/Mill	Date	Attendees	Mode	Genting Sri Gading Estate	16/12/2021	12 internal	meeting	21/12/2021	43 external	Feedback	30/10/2020	43 external	Feedback	Genting Kulai Besar Estate	31/12/2022	40 external	Feedback	20/12/2021	40 external	Feedback	Complied
Estate/Mill	Date	Attendees	Mode																					
Genting Sri Gading Estate	16/12/2021	12 internal	meeting																					
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	30/10/2020	43 external	Feedback																					
Genting Kulai Besar Estate	31/12/2022	40 external	Feedback																					
	20/12/2021	40 external	Feedback																					

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			19/12/2019	14 both	Meeting
		Ayer Item Oil Mill	09/2/2022	All listed	Feedback
			08/12/2021	26 internal	Meeting
			22/10/2020	All listed	Feedback
			19/09/2019	16	Meeting
			28/08/2018	19	Meeting
			Genting Tebong Estate	28/1/2020	-
		Genting Tanah Merah Estate	10/9/2021	-	Meeting
	<p>Details as elaborated among others includes;</p> <ul style="list-style-type: none"> a) Establishment of GPB SOP ref SOP PD - 12 Oct 2020 titled Fire Prevention & Measures and Engagement with Stakeholders. b) Briefing to all present on agenda no 8 & 9 on pollution issues and fire burning direct and indirect incidences. c) Hot spot monitoring by GPRC personnel based in Sepang. d) Safety Health and Environment 				

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		<p>e) Implementation of no open burning /domestic waste management</p> <p>f) Sustainability Policies</p> <p>There were follow-up on the briefing and others commitment through stakeholder feedback in a form distributed by the mill/estate at specified dates above.</p>									
<p>Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>											
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>No land clearing was conducted within the Genting Ayer Item Oil Mill Certification Units since November 2005.</p> <p>The Certification Units has conducted the HCV assessment as per report Inventory on HCV sites within Genting Plantations Berhad Group of Estates –Central Region (Genting Tebong Estate) and Inventory on HCV sites within Genting Plantations Berhad Group of Estates –Southern Region (Genting Kulai Besar Estate and Genting Sungai Rayat Estate) conducted in February to March 2010 by S.K. Yap Forestry and Landscape Advisory Services. The report of assessment contained in High Conservation Value (HCV) Final Report (Version 2.0), 02/01/2015 by MNS Malaysian Nature Society</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</p>	<p>The CU had re-assessed to collate information relating to HCV. The assessment contained information of both planted area and relevant wider landscape-level, and result HCV identified. There was 2 separate reports prepared by the HCV assessors 1 each for the Southern region and central region covering among others the mill/estates audited GAIPOM, GKBE, and GSGE respectively. The HCV identified in the CU is as follows;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Estate</th> <th style="width: 40%;">Description</th> <th style="width: 15%;">HCV 4.2</th> <th style="width: 20%;">HCV 6</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Estate	Description	HCV 4.2	HCV 6					Complied
Estate	Description	HCV 4.2	HCV 6								

<p>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). - Critical (Major) compliance -</p>	GPB Sri Gading	Riparian Buffer Zone	4.11 ha	-
	GPB Sri Gading	Temple /Cemeteries	-	1.0 ha
	GPB Kulai Besar	Riparian Buffer Zone	24.42 ha	-
	GPB Kulai Besar	Riparian Buffer Zone	10.64 ha	-
<p>The HCV assessment for both the estates was made by an appointed qualified assessor titled Inventory On HCV sited in Oct 2009 –July 2010. The report was sighted and verified. The following aspects areas were assessed as to their state and management.</p> <ul style="list-style-type: none"> a)Area of HCV-Shared management of forest reserve and boundary areas/buffer zones b)The presence of large mammals and birds and how they are protected from poaches. c) IPM: use of plants to attract <i>parasitoids</i> to control bagworms & barn owls for rats management and success d)Drainage and the conditions. Determining the presence of fishes as a bio-indicator of water health <p>The report details the findings of a rapid appraisal of the biodiversity in the estates and addresses the RSPO P&C relevant to biodiversity conservation and HCV. Therein being provided details relating to the following;</p> <ul style="list-style-type: none"> a) General biodiversity issues b) Watercourses and drainage c) Habitats natural and man-made d) Wildlife 				

		<ul style="list-style-type: none"> e) Ponds and reservoirs f) Wetlands /watercourses g) Legal aspects h) Immediate and long term effect. 	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not Applicable	Complied
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	The auditor verified that there is no HCVs, HCS forests identified after 15 November 2018. The audit findings have confirmed that there is no new planting (refer 7.7.1) affecting present HCV and primary forest. There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV.	Complied
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	The auditor verified that there is no HCVs, HCS forests identified after 15 November 2018 where rights of local communities had been identified. The audit findings have confirmed that there is no new planting (refer 7.7.1) affecting present HCV and primary forest. There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV.	Complied
7.12.6	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	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. There is only common bird, presence of wild boar and monkeys occasionally sighted. The appropriate	Complied

	<p>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>measures that are expected to maintain and/or enhance them were implemented through an action plan reviewed in Jan 2022.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the GM/SHO and also personnel from the Sustainability unit. Sighting of RTE are made and recorded during the AP rounds in the estates 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 planting affecting present HCV and primary forest. There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV.</p>	Complied

Appendix B: GHG Reporting Executive Summary

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

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

The summary of the Net GHG emitted in 2021 for Genting Ayer Item Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.44
PKO	0.00

Extraction	%
OER	20.24
KER	5.34

Production	t/yr
FFB Process	195,681.78
CPO Produced	39,600.31
PKO Produced	0.00

Land Use	Ha
OP Planted Area	12,555.24
OP Planted on peat	338.03
Conservation (forested)	0
Conservation (non-forested)	157.06
Total	13,050.33

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	92241.76	0.47	0.00	0.00	0.00	0.00	92241.76	0.47
CO ₂ Emission from fertilizer	12319.44	0.06	0.00	0.00	0.00	0.00	12319.44	0.06
NO ₂ Emission	10645.35	0.05	0.00	0.00	0.00	0.00	10645.35	0.05
Fuel Consumption	1940.72	0.01	0.00	0.00	0.00	0.00	1940.72	0.01
Peat Oxidation	18456.42	0.09	0.00	0.00	0.00	0.00	18456.42	0.09
Sink								
Crop Sequestration	85,315.58	-0.44	0.00	0.00	0.00	0.00	85,315.58	-0.44
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	50,288.12	0.26	0.00	0.00	0.00	0.00	50,288.12	0.26

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	26,534.05	0.14
Fuel Consumption	81.26	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	-4,588.08	-0.02
Sales of EFB	0.00	0.00
Total	22,027.23	0.12

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.

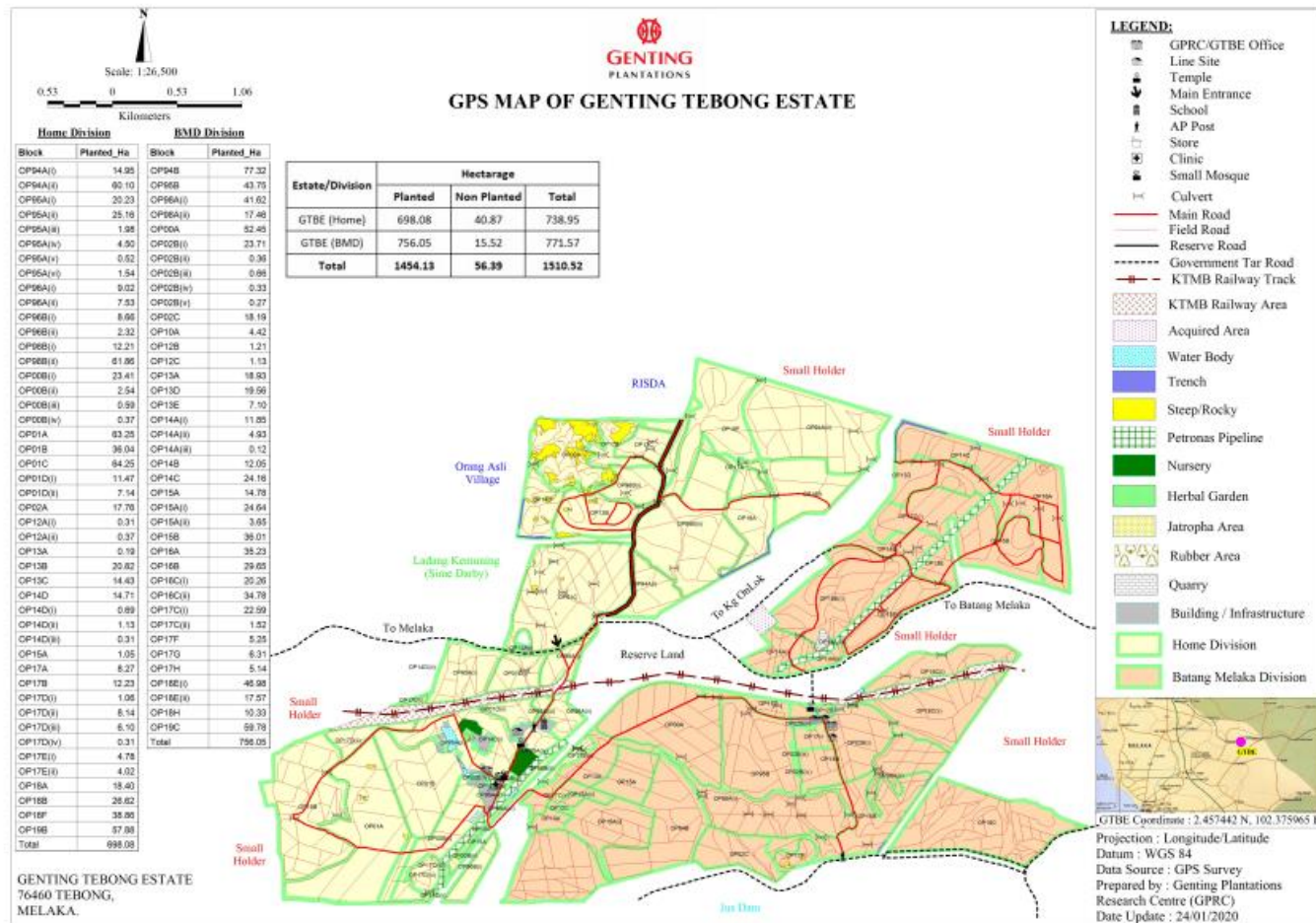
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

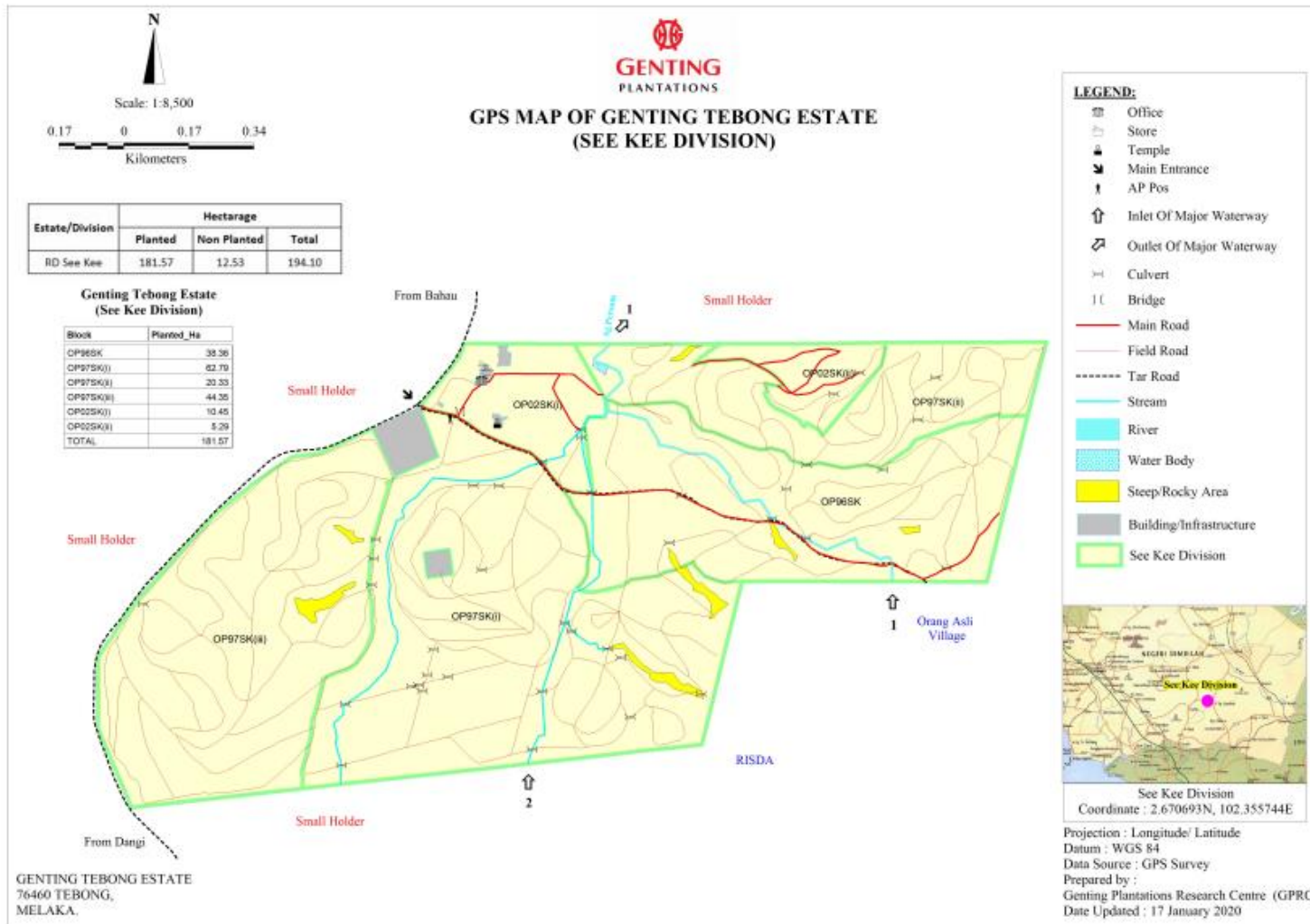
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases

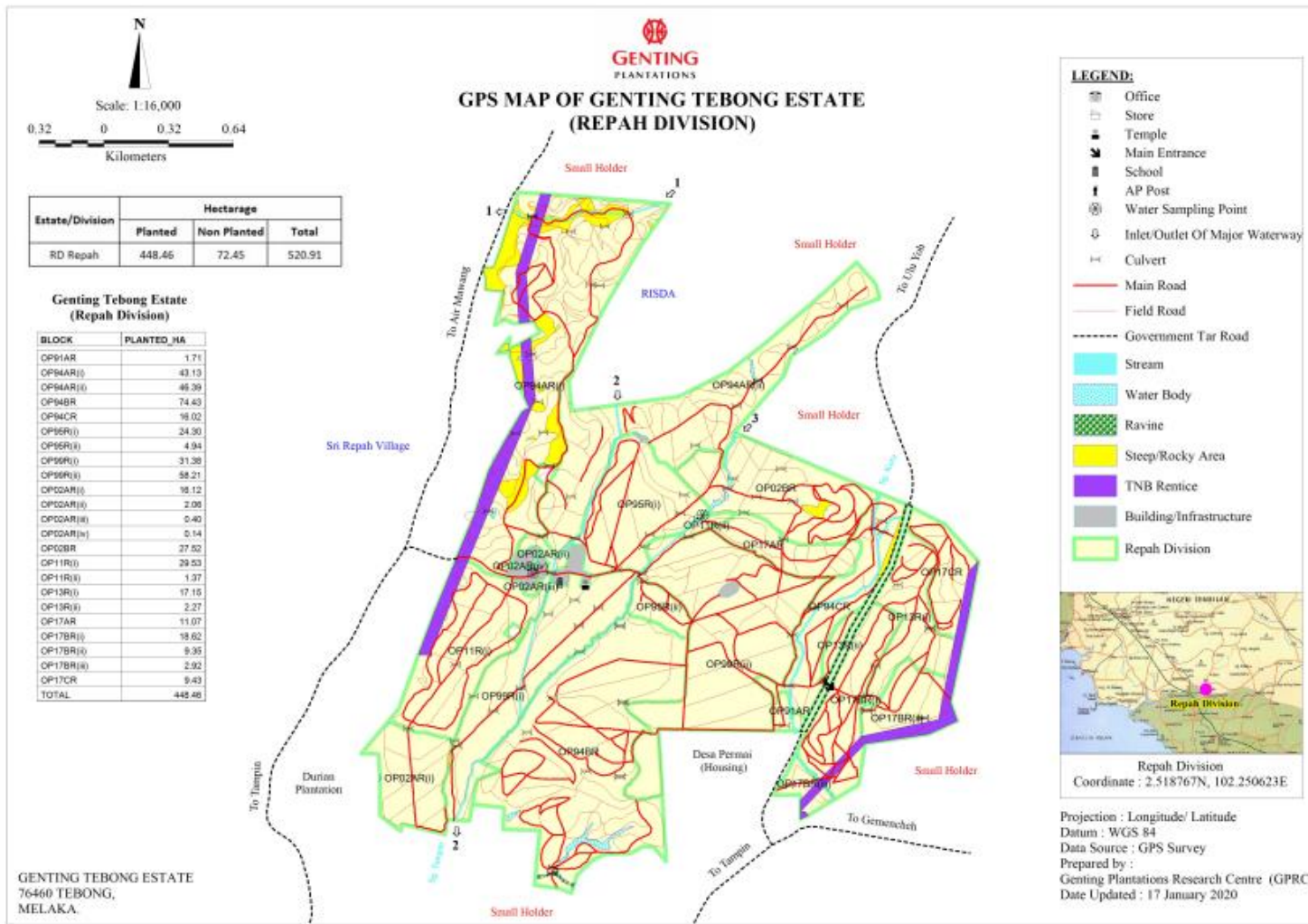


Appendix D: Estate Field Map

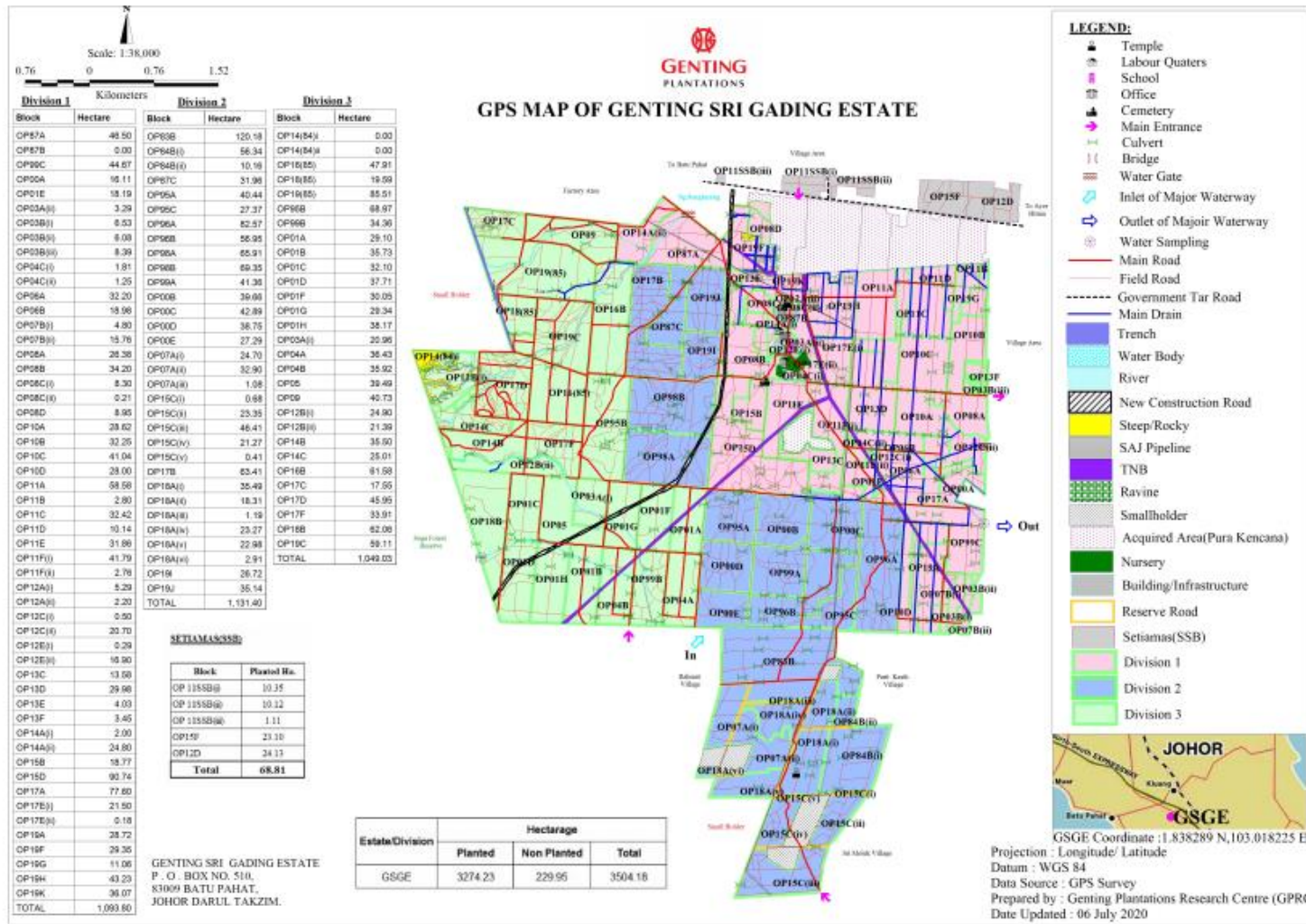




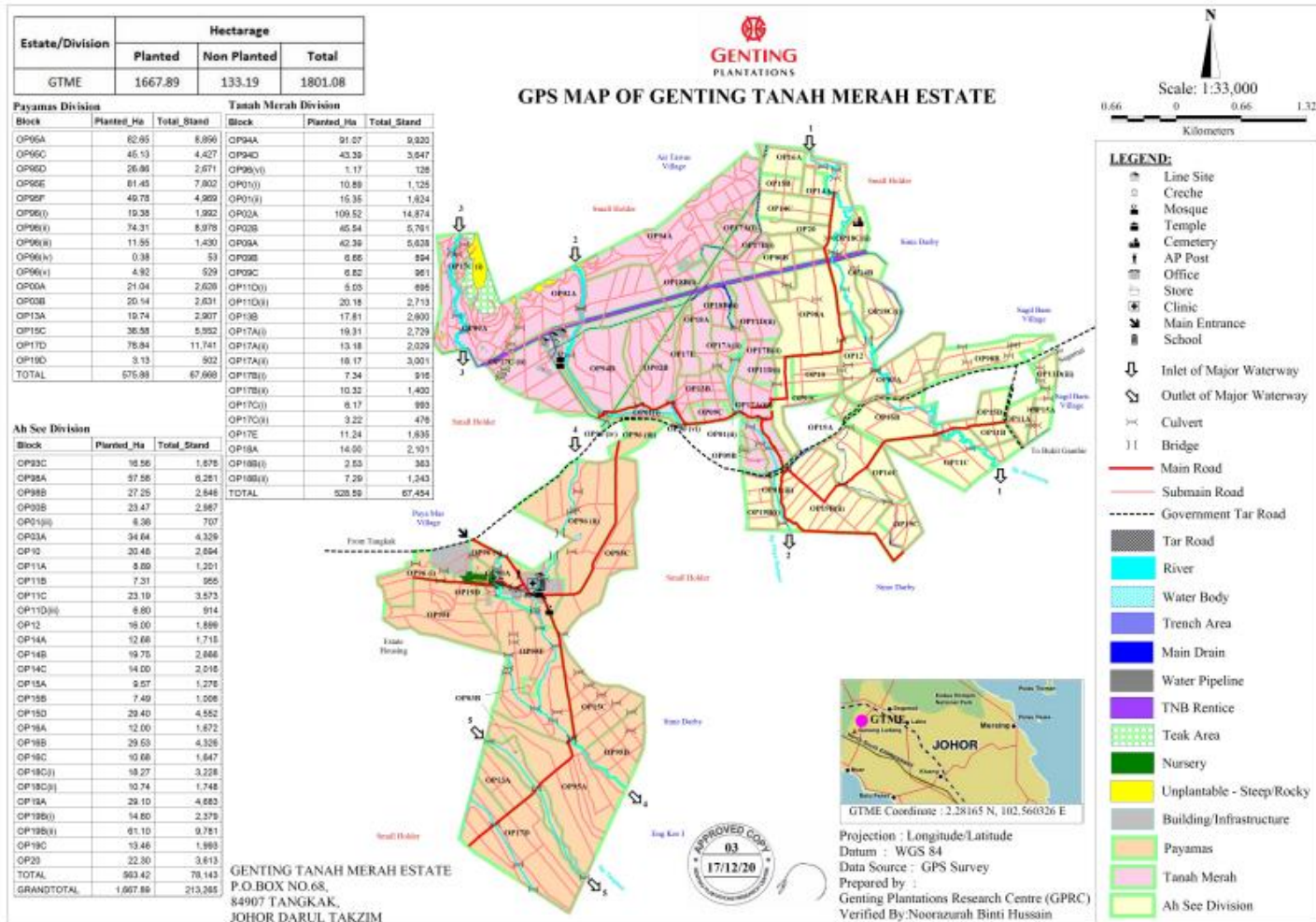
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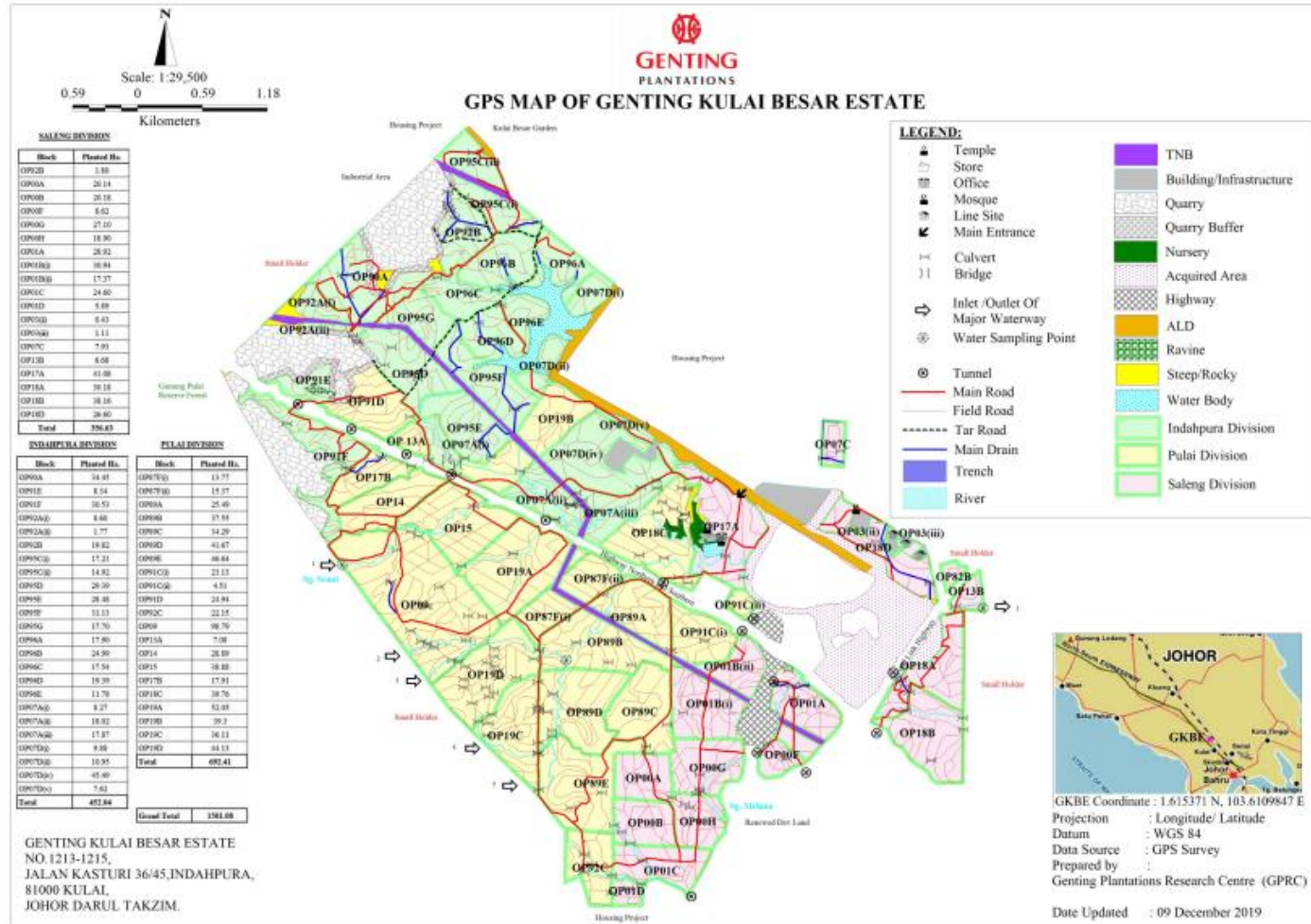
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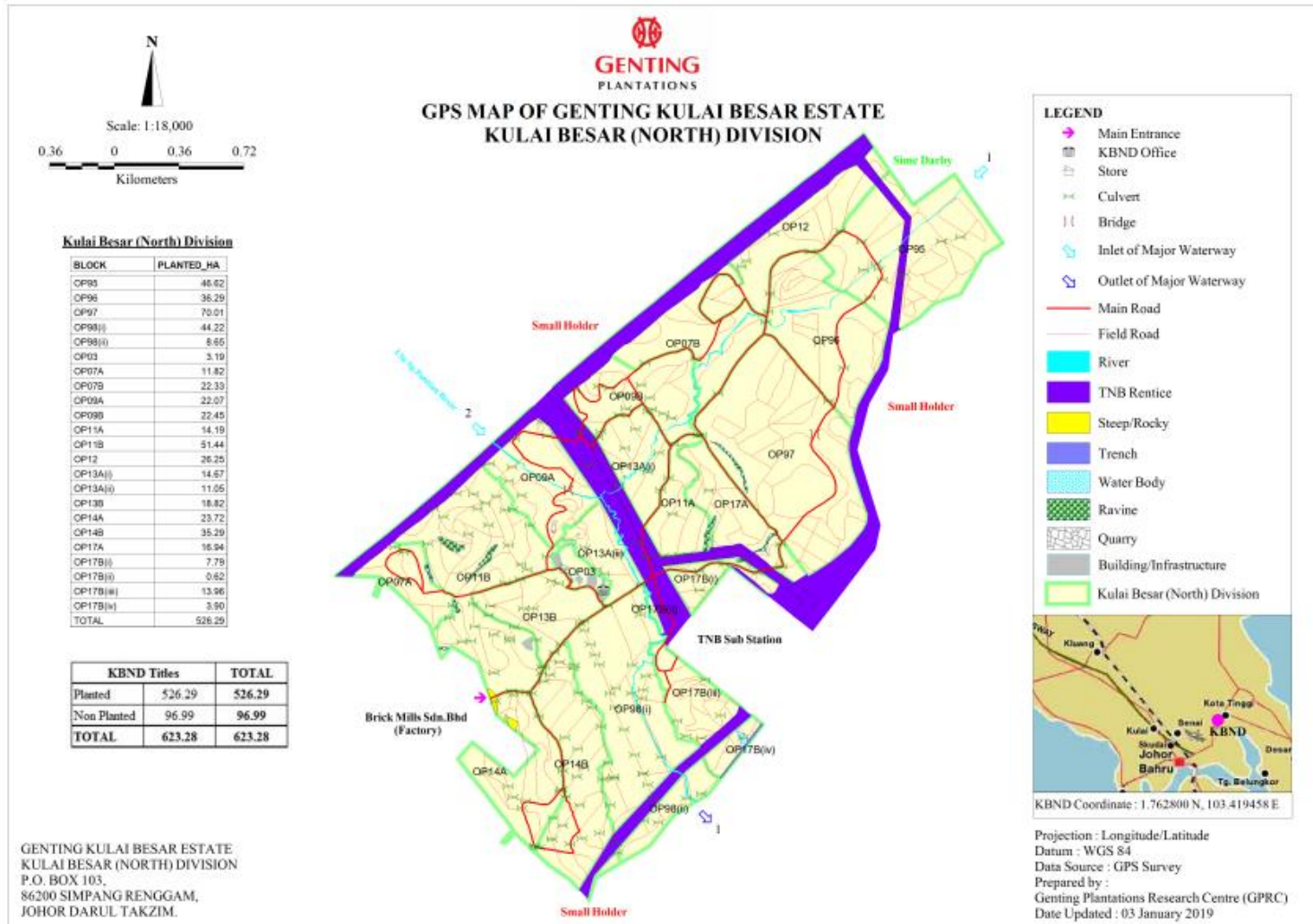


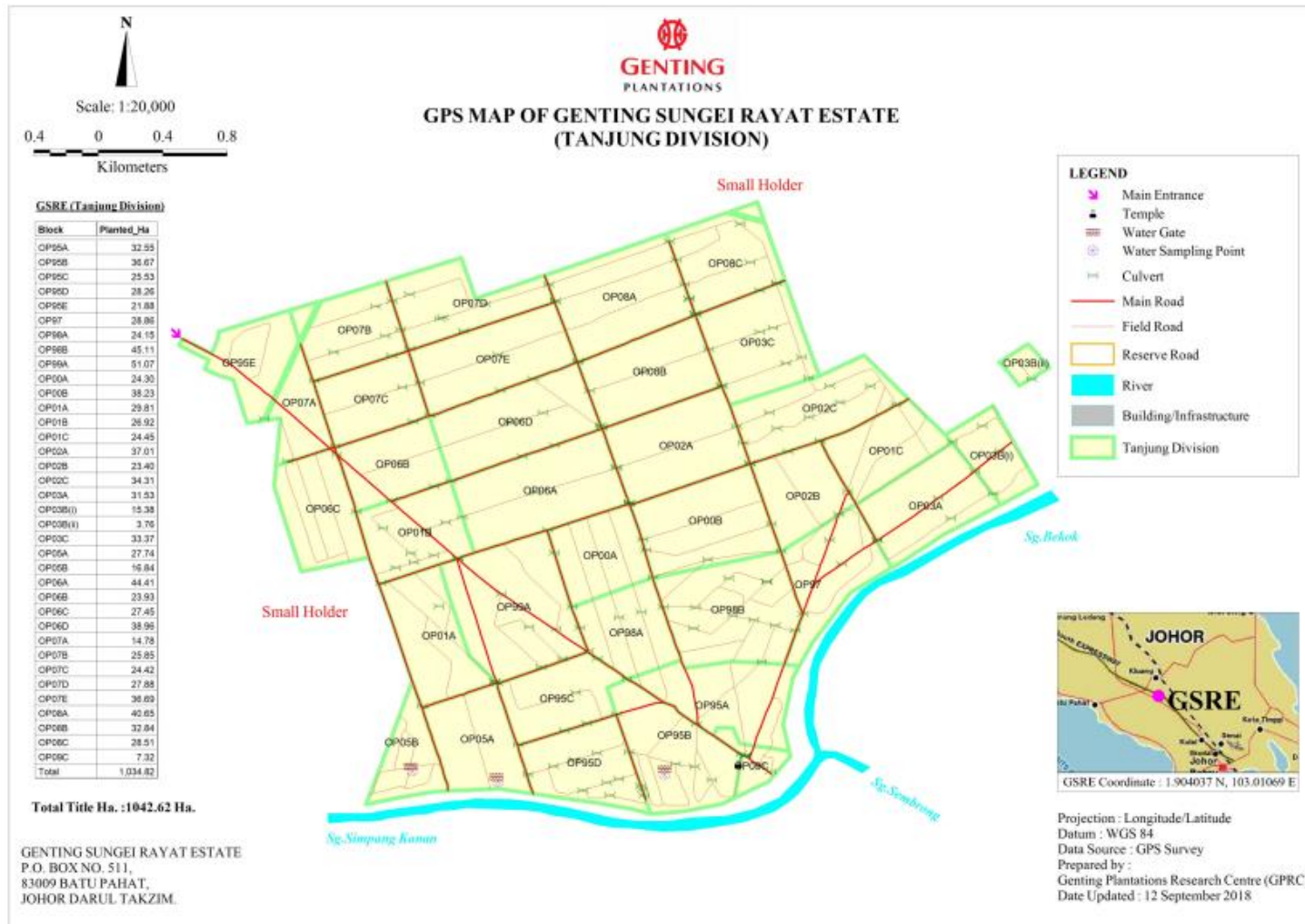
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Revision 12 (Jun 2021)

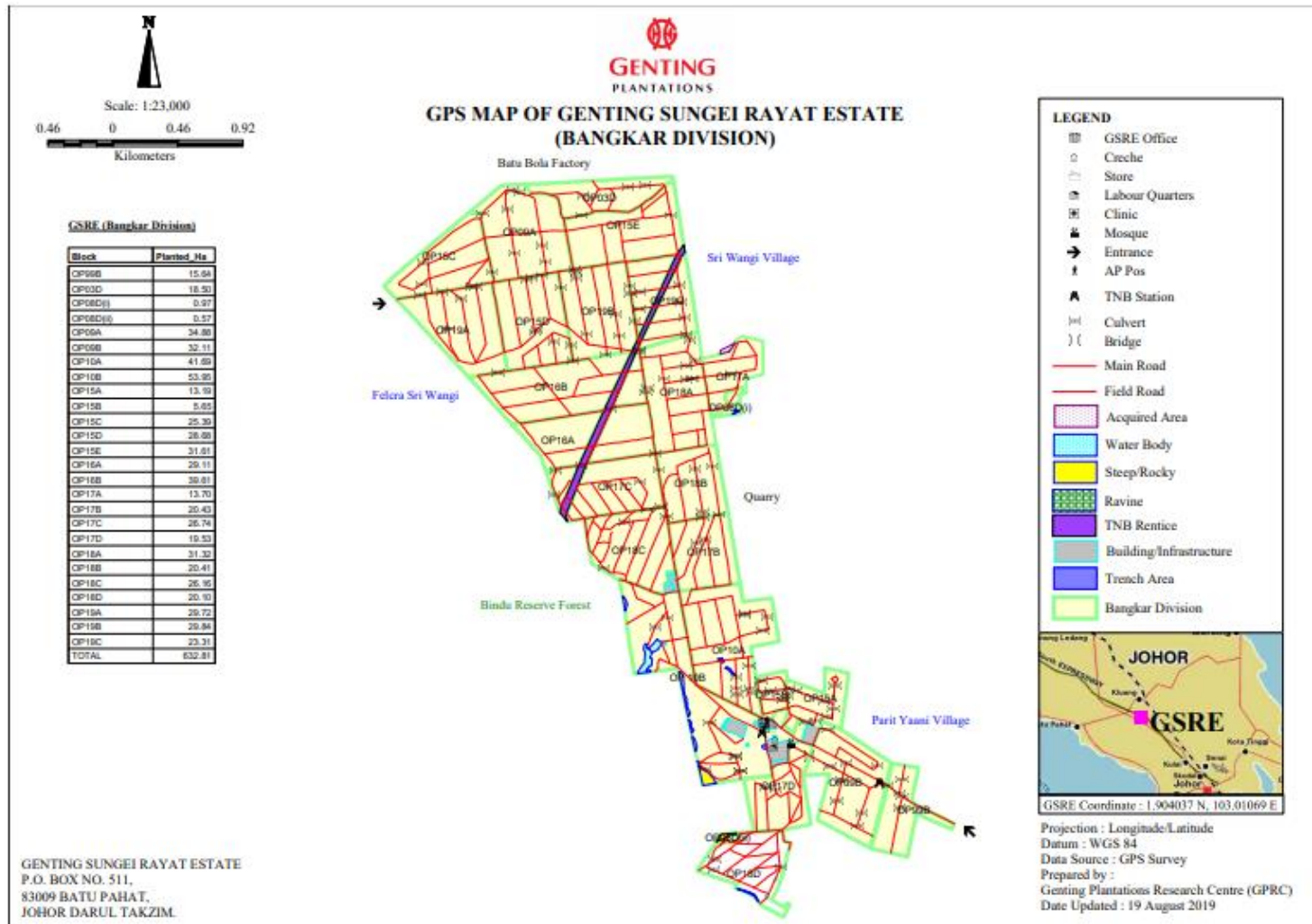


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Appendix E: List of Smallholder Registered and sampled

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