

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (1_3)
- Recertification Assessment (Choose an item.)
- Extension of Scope

GENTING PLANTATIONS BERHAD
Client Company / Parent 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, Air Hitam, 86100, Johor, Malaysia
Date of Final Report: 18/06/2023

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Genting Plantations Berhad		
RSPO Membership Number	1-0086-06-000-00	Membership Approval Date	14/11/2006
Address	10th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia.		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Genting Oil Mill Sdn Bhd Genting Ayer Item Oil Mill		
Location / Address	Batu 54, Jalan Johor, Ayer Hitam 86100, 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 Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre-Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	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		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 696629	MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services (M) Sdn Bhd	28/06/2023
MSPO 682363	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		28/06/2023
MSPO 716638	MSPO Supply Chain Certification Standard 2018		23/10/2024
EU-ISCC-Cert-DE119 60213390	ISCC EU	ASG Cert GmbH	31/10/2023

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	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

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5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes		
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	71.33
Genting Sri Gading Estate	3,266.69	29.93	391.72	3,688.34	87.55
Genting Sungei Rayat Estate	2,300.78	0.18	78.02	2,378.98	96.71
Genting Tanah Merah Estate	2,044.96	46.60	150.49	2,242.05	91.21
Genting Tebong Estate	2,872.40	45.29	92.04	3,009.73	95.44
Total	12,512.20	157.06	1,534.93	14,204.19	88.09

Note: 43.04 ha decrease in Genting Sri Gading Estate's planted area compared to previous year due to acquisition by Genting Property Sdn Bhd, the property division of Genting Plantations Berhad.

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Genting Kulai Besar Estate	431.91	828.76	420.44	346.26	1,595.46	431.91
Genting Sri Gading Estate	676.06	1,418.42	984.27	187.94	2,590.63	676.06
Genting Sungei Rayat Estate	191.26	766.93	1,310.04	32.55	2,109.52	191.26
Genting Tanah Merah Estate	297.28	744.21	713.26	290.21	1,747.68	297.28
Genting Tebong Estate	641.86	774.12	871.57	584.85	2,230.54	641.86
Total (ha)	2,238.37	4,532.44	4,299.58	1,441.81	10,273.83	2,238.37

Note:

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7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Mar 2022 - Feb 2023)	Actual (Feb 2022 – Jan 2023)		Forecast (Mar 2023 - Feb 2024)
		Previous license period (Feb 2022)	Current license period (Mar 2022 - Jan 2023)	
Genting Kulai Besar Estate	34,515.00	1,930.59	31,285.28	38,352.00
Genting Sri Gading Estate	60,710.00	4,217.06	54,469.86	61,400.00
Genting Sungei Rayat Estate	46,800.00	3,349.65	45,578.09	54,810.00
Genting Tanah Merah Estate	23,125.00	2,150.98	25,454.31	29,961.00
Genting Tebong Estate	46,050.00	3,944.01	44,706.44	51,912.00
Subtotal	211,200.00			
Volume extension	6,000.00			
Total	217,200.00	217,086.27		236,435.00

Note: * GTME have crop diversion to 3rd party mills (Fermanegh POM – Sg Pelek, Sepang).

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Mar 2022 - Feb 2023)	Actual (Feb 2022 – Jan 2023)		Forecast (Mar 2023 - Feb 2024)
		Previous license period (Feb 2022)	Current license period (Mar 2022 - Jan 2023)	
N/A		N/A	N/A	
Total		N/A		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Mar 2022 - Feb 2023)	Actual (Feb 2022 – Jan 2023)		Forecast (Mar 2023 - Feb 2024)
		Previous license period (Feb 2022)	Current license period (Mar 2022 - Jan 2023)	
N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A		N/A

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9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Feb-22	15,592.29	-	15,592.29
2	Mar-22	18,433.52	-	18,433.52
3	Apr-22	18,555.79	-	18,555.79
4	May-22	18,058.68	-	18,058.68
5	Jun-22	18,249.03	-	18,249.03
6	Jul-22	18,682.81	-	18,682.81
7	Aug-22	20,302.79	-	20,302.79
8	Sep-22	19,914.25	-	19,914.25
9	Oct-22	19,920.81	-	19,920.81
10	Nov-22	18,297.88	-	18,297.88
11	Dec-22	17,430.93	-	17,430.93
12	Jan-23	13,647.49	-	13,647.49
TOTAL		217,086.27	-	217,086.27

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Mar 2022 - Feb 2023)	Actual (Feb 2022 – Jan 2023)		Forecast (Mar 2023 - Feb 2024)
	Previous license period (Feb 2022)	Current license period (Mar 2022 - Jan 2023)	
FFB	FFB		FFB
211,200.00 mt	15,592.29 mt	201,493.98 mt	236,435.00 mt
	TOTAL	217,086.27 mt	
CPO (OER: 20.50%)	CPO (OER: 20.04%)		CPO (OER: 20.41%)
43,296.00 mt	2,932.37 mt	40,577.08 mt	48,256.00 mt
	TOTAL	43,509.45 mt	
PK (KER: 5.50%)	PK (KER: 5.17 %)		PK (KER: 5.25%)
11,616.00 mt	773.546 mt	10,441.015 mt	12,413.00 mt
	TOTAL	11,214.57 mt	

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10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Feb-22	2,932.37	773.55
2	Mar-22	3,839.05	1,000.26
3	Apr-22	3,748.59	971.07
4	May-22	3,608.37	909.15
5	Jun-22	3,695.95	917.83
6	Jul-22	3,946.57	996.55
7	Aug-22	3,987.51	1,040.72
8	Sep-22	3,992.31	1,039.76
9	Oct-22	3,950.87	1,027.45
10	Nov-22	3,643.83	916.36
11	Dec-22	3,418.41	930.86
12	Jan-23	2,745.62	691.01
TOTAL		43,509.45	11,214.57

11. Summary of Actual Volume sold					
Current License period (Mar 2022 - Jan 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	40,271.270	-	-	-	40,271.27
PK (MT)	10,302.640	-	-	-	10,302.64
Credits	-	-	-	-	-
Previous License period (Feb 2022)					
CPO (MT)	3,001.850	-	-	-	3,001.85
PK (MT)	707.730	-	-	-	707.73
Credits	-	-	-	-	-

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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	A	RSPO_PO100000016x	17,321.83	-
2	B	RSPO_PO100000003x	1,000.98	-
3	C	RSPO_PO100000017x	1,279.24	-
4	D	RSPO_PO100000015x	4,006.38	-
5	E	RSPO_PO100000071x	19,664.69	-
6	F	RSPO_PO10000071xx	-	3,458.55
7	G	RSPO_PO10000029xx	-	4,900.38
8	H	RSPO_PO100000006x	-	2,651.44
TOTAL			43,273.12	11,010.37

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

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

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

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

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

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

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **20/02/2023 - 24/02/2023**.

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 **05/05/2023**. The audit programs are included in Section 2.3.

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

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (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, 2024 - February 24, 2024

Total Number of Mandays: 15 Man-days

2.2 BSI Assessment Team

Name	Role	Competency
Valence Shem (VSH)	Team Leader	<p>Education: BTech (Hons) Bachelor’s Degree in Industrial Technology, University of Science Malaysia</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1) 9 years working experience in oil palm plantation industry 2) Management system auditing since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS, MSPO and SMETA <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 14001 Lead Auditor Course 2) ISO 9001 Lead Auditor Course 3) Endorsed RSPO P&C Lead Auditor Course 4) Endorsed RSPO SCCS Lead Assessor Course 5) MSPO Awareness Training 6) ISO 45000 Lead Auditor Course 7) SMETA Auditor training

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		<p>8) HCV-HCS training 9) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course 10) RSPO-endorsed refresher training</p> <p>Aspect covered in this audit: Legal requirements, training, economic management plan, estate & mill best practice, HIRARC, OHS, safe operating procedures, continual improvement, and supply chain.</p> <p>Language proficiency: English and Bahasa Malaysia</p>
<p>Hafriazhar bin Mohd Mokhtar (HMM)</p>	<p>Team Member</p>	<p>Education: Bachelor’s Degree in Chemical Engineering, University of Technology Malaysia</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1) More than 5 years of direct work experience in the upstream processes of palm oil within the plantation industry 2) Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days as auditor for multiple disciplines covering Malaysia, Indonesia and Thailand <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 14001 Lead Auditor Course 2) ISO 9001 Lead Auditor Course 3) Endorsed RSPO P&C Lead Auditor Course 4) Endorsed RSPO SCCS Lead Assessor Course 5) MSPO Awareness Training 6) ISO 45000 Lead Auditor Course 7) SMETA Auditor training 8) HCV-HCS training 9) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course 10) RSPO-endorsed refresher training <p>Aspect covered in this audit: Legal requirements, policy and commitment, social requirements, contract agreement, human rights, ILO requirements, workers’ welfare, smallholder welfare, stakeholder consultation, and right to use land.</p> <p>Language proficiency: English and Bahasa Malaysia</p>
<p>Vijay Kanna Pakirisamy (VKP)</p>	<p>Team Member</p>	<p>Education:</p>

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		<p>Bachelor’s Degree in Agribusiness Science Management with Honours from University Utara Malaysia</p> <p>Work Experience:</p> <p>1) 10 years tenure in the oil palm industry – Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad</p> <p>Training attended:</p> <p>1) ISO IMS 9001 2) ISO 14001 Lead Auditor Course 3) ISO 45001(OHS 18001) 4) Endorsed RSPO P&C Lead Auditor Course 5) Endorsed MSPO Lead Auditor Course 6) SMETA Auditor training 7) HCV-HCS training 8) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course 9) RSPO-endorsed refresher training</p> <p>Aspect covered in this audit:</p> <p>Legal requirements, natural and HCV conservation, water & wastes management, environmental aspects, smallholders inclusion, and contract due diligence.</p> <p>Language proficiency:</p> <p>English and Bahasa Malaysia</p>
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Accompanying Persons:

Name	Role
Ahmad Ruffi bin Abu Talib Khan (ARF)	Observer

2.3 Assessment Plan

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

Date	Time	Subjects	VSH	HMM	VKP
Monday 20/02/2023	0830-0900	<p>Opening meeting:</p> <ul style="list-style-type: none"> • Opening presentation by audit team leader • Confirmation of assessment scope and finalize audit plan (including stakeholder’s consultation) 	✓	✓	✓

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Date	Time	Subjects	VSH	HMM	VKP
	0900-1300	<u>Genting Kulai Besar Estate</u> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighboring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-
	1300-1400	Lunch break			
	1400-1630	<u>Genting Kulai Besar Estate</u> Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓
	1630-1700	Interim closing briefing	✓	✓	✓
Tuesday 21/02/2023	0900-1300	<u>Genting Ayer Item Oil Mill</u> Site visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	✓	✓	✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighboring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-
	1300-1400	Lunch break			
	1400-1630	<u>Genting Ayer Item Oil Mill</u> Document Review P1 – P7: SOPs, Supply chain, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓
	1630-1700	Interim closing briefing			

Date	Time	Subjects	VSH	HMM	VKP
Wednesday 22/02/2023	0900-1300	<u>Genting Sri Gading Estate</u> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighboring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-
	1300-1400	Lunch break			
	1400-1630	<u>Genting Sri Gading Estate</u> 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 – Auditors travel to Tampin and hotel check-in	✓	✓	✓
Thursday 23/02/2023	0900-1300	<u>Genting Tanah Merah Estate</u> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc. and documentation review.	✓	✓	✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighboring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-
	1300-1400	Lunch break			
	1400-1630	<u>Genting Tanah Merah Estate</u> 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	✓	✓	✓

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Date	Time	Subjects	VSH	HMM	VKP
		area, Scheduled waste management, worker housing, clinic, Landfill, etc. and documentation review.			
	1630-1700	Interim closing briefing			
Friday 24/02/2023	0900-1300	<u>Genting Tebong Estate</u> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighboring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-
	1300-1400	Lunch break			
	1400-1530	<u>Genting Tebong Estate</u> 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.).	✓	✓	✓
	1530-1600	Interim closing briefing	✓	✓	✓
	1600-1630	Audit team discussion & preparation for closing meeting	✓	✓	✓
	1630-1700	Closing meeting	✓	✓	✓

Critical NC Closure Verification Plan

Date	Time	Subjects	VSH
Friday 05/05/2023	0900-0915	Opening briefing by the audit team leader	✓
	0915-1230	Verification of effective implementation of corrective and corrective action for NCR #2309739-202302-M1 to M6, including site visits and interview with the relevant stakeholders.	✓
	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?	All the subsidiaries of Genting Plantations Berhad in Malaysia and Indonesia had been included in their time bound plan. The details of the subsidiaries and the certification units are described in the approved Time Bound Plan table below.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	No. The delays are due to the following factors: <ol style="list-style-type: none"> 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. PT SISM is in the process of NPP and obtaining HGU. 4. PT SMA's NPP & HCSA Report Completed. In process of obtaining HGU. 5. PT CSC is in the process of obtaining HGU. HCSA report completed review 6. NPP in progress for PT KIU 	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	Based on RSPO approved time bound plan, there was no new acquisitions as of Feb 2023.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there are some deviations at Indonesia units. Approval had been obtained from RSPO based on email from RSPO dated 11/11/2022 was verified.	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 months & years for the planned certification. Approval email from RSPO dated 11/11/2022 was verified. Yes, this is consistent with the ACOP report.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	Yes, there have been isolated lapses in implementation of the plan. Nonetheless, based on the revision request of TBP from the client to RSPO, justifications of the lapses were provided. The revised TBP was approved by RSPO on 11/11/2022.	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>Based on the justifications of the lapses provided in the revision request of TBP from the client to RSPO, there has been no fundamental failure to proceed with implementation of the plan. The revised TBP was approved by RSPO on 11/11/2022.</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: https://highcarbonstock.org/registered-hcsa-and-hcv-hcsa-assessments/</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>Completed Peer Reviewed HCV reports: PT Sawit Mitra Abadi: https://hcvnetwork.org/reports/hcv-assessment-in-permit-of-additional-area-1-000-ha-pt-sawit-mitra-abadi-ketapang-regency-west-kalimantan-provice/ PT United Agro Indonesia: https://hcvnetwork.org/reports/high-conservation-value-assessment-hcv-in-the-permit-area-pt-united-agro-indonesia/ PT Agro Abadi Cemerlang: https://hcvnetwork.org/reports/final-report-of-high-conservation-value-assessment-in-the-concession-area-of-pt-agro-abadi-cemerlang-sanggau-regency-west-kalimantan-province/ PT Kharisma Inti Usaha (KIU): https://hcvnetwork.org/reports/high-conservation-value-identification-pt-kharisma-inti-usaha/ <u>NPPs in progress:</u> PT Sepanjang Intisurya Mulia https://hcvnetwork.org/reports/laporan-hcv-hcs-integrasi-di-areal-izin-penambahan-luasan-pt-sepanjang-intisurya-muliakabupaten-ketapang-provinsi-kalimantan-barat/</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>Based on RSPO Complaints System or Dispute Settlement Facility https://askrspo.force.com/Complaint/s/casetracker, there is no outstanding land conflicts. Should there be any, the following company's procedures applied: <u>Indonesian Operating Units</u> SOP - CPD – 02-00.00 <i>Mekanisme Penyelesaian Sengketa Lahan</i> <u>Malaysian Operating Unit</u></p>	<p>Complied</p>

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	<p>SMP-GPB-18 Negotiation, Compensation and Handling Procedures</p> <p>Referring to the RaCP Tracker, Genting Plantations Berhad has a total of 7 submitted LUCA which all of them had been reviewed. There are 3 CN required which 1 of them has been submitted and approved. There are also 6 RP required which 2 of them have been submitted and 1 has been approved.</p>	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>Based on RSPO Complaints System or Dispute Settlement Facility</p> <p>https://askrspo.force.com/Complaint/s/casetracker, there is no outstanding labour dispute. Should there be any, the following company's procedures applied:</p> <p><u>Indonesian Operating Unit</u> SOP - HRD-04-00.00 <i>Penyelesaian Keluh Kesah</i></p> <p><u>Malaysian Operating Unit</u> SMP-GPB-19 Complaints and Grievances</p>	<p>Complied</p>
<p>Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>No legal non-compliance to be addressed.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Yes, GPB's Sustainability Dept conducted the internal audits in several dates January 2023 for the uncertified estates. Positive Assurance Statement for 2023 was made available for verification.</p>	<p>Complied</p>
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>Based on the internal audit reports, there were several NC raised and one of them is related to Indicator 7.12.8. At the point of this assessment, there are on-going RaCP to be resolved. This can be viewed at https://rspo.org/as-an-organisation/tools/remediation-and-compensation/racp-trackers/</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Yes. NGOs were engaged especially in developing the HCV documentations for the uncertified units Among the NGOs consulted were:</p> <ul style="list-style-type: none"> - WWF (Sintang) - Rainforest Alliance (Sintang and Ketapang) - Tropenbos International (Ketapang) - YIARI (Ketapang) - BOSF (Kapas) 	<p>Complied</p>

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	<p>NA as no scheme smallholders and/or scheme out-growers supplying to the mill.</p>	<p>Not Applicable</p>

Approved Time Bound Plan

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of November 2022	Any unresolved non-compliances
1	Genting Plantations (WM) Sdn Bhd & Setiamas Sdn Bhd (100%) for estates Genting Oil Mill Sdn Bhd (100%) for mill	Genting Sri Gading Estate	Supply base for Genting Ayer Item Oil Mill, Johor, Malaysia	Dec, 2014	Certified	None
2		Genting Sungei Rayat Estate				
3		Genting Kulai Besar Estate				
4		Genting Tanah Merah Estate		Dec, 2015		
5		Genting Tebong Estate		July, 2015		
6	Genting Plantations (WM) Sdn Bhd (100%) for estate	Genting Selama Estate, Kedah, Malaysia		July 2019	Certified	None
7	Genting Oil Mills (Sabah) Sdn Bhd (100%) for Mill Genting Plantations Berhad (Estate)	Genting Sabapalm Estate, Sabah, Malaysia	Supply base for Genting Sabapalm Oil Mill, Sabah, Malaysia	Aug, 2015	Certified	None
8	Genting Tanjung Bahagia Sdn Bhd (100%) for estates Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Tanjung Estate, Sabah, Malaysia	Supply base for Genting Tanjung Oil Mill, Sabah, Malaysia	Aug, 2016	Certified	None
9		Genting Tenegang Estate, Sabah, Malaysia				
10		Genting Layang Estate, Sabah, Malaysia				
11		Genting Bahagia Estate,				
12	Landworthy Sdn Bhd (84%)	Genting Landworthy Estate, Sabah, Malaysia				

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of November 2022	Any unresolved non-compliances
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	Certified on 19/09/2022	Concept Note for RACP approved on 19/11/2021. RACP plan submitted and approved on 04/04/2022. Initial Audit conducted in May 2022.
14	Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Permai Estate, Sabah, Malaysia				
15		Genting Kencana Estate, Sabah, Malaysia				
16	Genting Oil Mills (Sabah) Sdn Bhd (100%) for estate and mill	Genting Jambongan Estate, Sabah, Malaysia	Supply base for Genting Jambongan Oil Mill, Sabah, Malaysia	Sept 2019	Certified	None
17	Genting Plantations Bhd Wawasan Land Progress Sdn Bhd (100%) Genting Oil Mills (Sabah) (Mill)	Genting Sekong Estate, Sabah, Malaysia	Supply base for Genting Trushidup Oil Mill, Sabah, Malaysia	Sept,2017	Certified	None
18	Asiaticom Sdn Bhd (100%) Sawit Sukau Usahasama Sdn Bhd(56%)	Genting Suan Lamba Estate, Sabah, Malaysia				
19	PT Sepanjang Intisurya Mulia (70%)	Mulia 1 & 2 Mulia 3 & 4 Mulia 5 & 6	Supply base for Mulia Oil Mill, Kalimantan, Indonesia	Oct, 2017	Certified	None
20	PT Sawit Mitra Abadi (70%)	Abadi 1 & 2 Abadi 3 & 4				

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of November 2022	Any unresolved non-compliances
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 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, 2023		NPP and HCSA Report completed for PT UAI. HGU obtained for UAI. RaCP Process (review 2 in progress); Stage 1 RSPO Audit completed in Jun'21.
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

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		SP Plasma		Oct, 2023		Exchange prior to HGU application.
28	PT Kapuas Maju Jaya (95%)	Waterfall Estate I & II Muhun Estate I & II Talawang Estate I & II	Supply bases for Golden Hill Oil 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.
31	PT Surya Agro Palma (70%)	SAP Estate 1&2 SAP Estate 3&4 SAP Estate 5&6	Supply base for Cemerlang Oil Mill, Kalimantan, Indonesia	Sept, 2023		In process of obtaining HGU. HCSA report completed review.
		Plasma		Sept, 2023		
32	PT Agro Abadi Cemerlang (70%)	AAC 1 & 2		Sept, 2023		In process of obtaining HGU HCSA report completed review. Report not published yet.
		AAC 3 & 4				
		Plasma – KSK1, KMB, BSL	Sept, 2023			

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of November 2022	Any unresolved non-compliances
33	PT Palma Agro Lestari Jaya (70%)	PALJ Estates		Dec, 2023		In process of obtaining HGU. HCSA report completed review.
		PALJ Plasma				
34	Knowledge One Investment Pte Ltd (85%)-PT Kharisma Inti Usaha (KIU)	KIU 1 & 2 KIU 3 & 4	Supply base for KIU Oil Mill	Dec, 2023		NPP in progress. HCV report approved by HCVRN. HCSA report is completed and waiting for peer review.

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 six (6) Critical; zero (0) Minor nonconformities and zero (0) Opportunity For Improvement raised. The Genting Ayer Item Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2309739-202302-M1	Issued Date	24/02/2023
Due Date	25/05/2023	Closure Date	19/05/2023
Indicator & Category (Critical / Minor)	2.2.2 (Major)		
Statement of Nonconformity:	Specific clauses on meeting applicable legal requirements not fully demonstrated by a third party contractor (FFB Transporter).		
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:	<p>Based on sample GSGE FFB Transporter/Contractor: Hiap Soon Trading Co. worker’s work agreement of Employee ID: XX-XX05 (Mohd. Khairudin Bin Prayet; IC: 811111-01-6005); Position: Pekerja Harian/Borong/Pajak;Date: 2015, it was found the following:</p> <ul style="list-style-type: none"> • No specific date of agreement except year 2015 only. • No specific work hour written in the agreement. • Only public holiday entitlement of 5 days specified in the agreement, but no annual leave and sick leave entitlement specified in the agreement. • Worker will be paid RM3.30 per MT FFB for transport of FFB from GSGE to GAIOM • Worker will be paid RM15.00 per trip if transporting FFB from GSGE to GAIOM on Sunday <p>Sample payslips of the same workers indicated the following:</p> <ul style="list-style-type: none"> - Payslip (Harvesters) # 2275; Month/Year: Jun’22; Name: Khairudin; Normal Working Days: 31; Field # 38; Bunches/MT: 472.55; Rate: 3.30; Amount: 1559.42; Wages 1559.42 (RM); SGP: 200 (RM); Allowances: 242.06 (RM); Total: 2001.48 (RM); Deductions – Advance: 1000 (RM); EPF: 141 (RM); SOCSO: 7.75 (RM); Total (deductions): 1148.75 (RM); Net Pay: 852.73 (RM); Date: 7/2/2022 - Payslip (Harvesters) # 2622; Month/Year: Aug’22; Name: Khairudin; Normal Working Days: 31; Field # 42; Bunches/MT: 549.58; Rate: 3.30; Amount: 1813.61; Wages 1813.61 (RM); SGP: 200 (RM); Allowances: 457.09 (RM); Total: 2470.70 (RM); Deductions – Advance: 250 (RM); EPF: 201 (RM); 		

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	<p>SOCOSO: 9.25 (RM); Total (deductions): 460.25 (RM); Net Pay: 2010.45 (RM); Date: 7/9/2022</p> <ul style="list-style-type: none"> - Payslip (Harvesters) # 2646; Month/Year: Dec'22; Name: Khairudin; Normal Working Days: 31; Field # 45; Bunches/MT: 581.51; Rate: 3.30; Amount: 1918.98; Wages 1918.98 (RM); SGP: 200 (RM); Allowances: 212.65 (RM); Total: 2331.63 (RM); Deductions – Advance: 500 (RM); EPF: 212 (RM); SOCOSO: 9.75 (RM); Total (deductions): 721.75 (RM); Net Pay: 1609.88 (RM); Date: 7/1/2023 <p>Based on the sample payslips, it was found the following:</p> <ul style="list-style-type: none"> - Number of workdays for month of June 2022 was specified as 31 despite there are only 30 days in June 2022. - No clear indication of legal Labour Act requirement that requires double pay for rest-day work and triple pay for public-holiday work despite the number of work days for all samples are full 31 days of the month with supposedly 1 day a week of off-day and at least 1 entitled public holiday each for month of June 2022 and August 2022. - Allowances paid not clearly described and included in the work agreement. <p>Hence, a Major NC has been raised due to the matter and recurrence of issue within same indicator.</p>
Corrections:	<ol style="list-style-type: none"> 1) All contractors were briefed and explained during the internal stakeholder meeting on 27.02.2023. 2) The estate management provided sample of agreement and payslip for contractor to follow as guide. 3) To ensure the contractors pay back the workers for the work done on Sunday (Rest Day Work) and Public Holiday, and that these are reflected accordingly at the updated payslips.
Root Cause Analysis:	Lack of monitoring/due diligence by the estate management to ensure that these conditions are complied by the contractors.
Corrective Actions:	Brief office clerk on the conditions/components to be stated in the payslip/agreement, and that these conditions/components must be checked/verified during the periodic Due Diligence of 3rd party contractors, before filing.
Assessment Conclusion:	<p>Closing of NCR was conducted on-site on 05/05/2023. The following evidence was verified:</p> <ol style="list-style-type: none"> 1) Records of attendance dated 27/02/2023 and training contents that show all contractors engaged by the estate have been briefed on the requirements of having mandatory information in the employment contract and pay slips. 2) Records of attendance that shows admin staff have been trained about the due diligence to be delivered which are checking and following up contractors' documents i.e., the employment contract and pay slip to ensure compliance to legal requirements 3) Newly revised employment contract format which was guided by GPB's format has been used to replace the old version. Information about specific date of agreement, specific working hour, gazetted public holidays, annual and sick leave entitlement has been included in the agreement. The information about

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	<p>double rate i.e., RM6.60/mt instead of RM15.00/trip when working on ret day has also been included.</p> <p>4) Newly revised pay slips for the months of January to March 2023 have been used to state the ammount of paid and deducted of the contractor’s employees’ wages. The formation of the new pay slip format was guided by GPB’s format. It has the information about no. of days work, allowance, and rate of wage when working on rest days and public holidays.</p> <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p>
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Non-conformity			
NCR Ref #	2309739-202302-M2	Issued Date	24/02/2023
Due Date	25/05/2023	Closure Date	19/05/2023
Indicator & Category (Critical / Minor)	3.6.2 (Major)		
Statement of Nonconformity:	The monitoring of effectiveness of the H&S plan to address health and safety risks to people was not satisfactorily demonstrated.		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	<p>At GSGE, there is a store built close to the labour quarters for the purpose of keeping petrol for the consumption of motorised cutter and mist-blower. However, the following lapses were noticed:</p> <ul style="list-style-type: none"> • The entrance door was not locked, hence easy accessibility • No hazard signage • Three out of five 20 liter-jerrycans containing petrol had no labels • Although there were trays put underneath the jerrycans as secondary containments, the floor of the store was still in a soil ground form. This is not in-line with the established guideline. 		
Corrections:	Demolished current store and transfer them to the centralised store at our current main petrol store for better monitoring and control, expected date by Mac 2023.		
Root Cause Analysis:	No full enforcement by the management team on the safety features due to interpretation 'Temporary store' as they not sure whether it's going to be a permanent structure.		
Corrective Actions:	<ol style="list-style-type: none"> 1) Briefing/training to the store clerk & staffs on the safety & environment features, and that any temporary store shall not be exempted from any safety/environment features 2) Assessment by Sustainability Dept during Internal Audit 3) Brief all workers to keep petrol at the main petrol store for better monitoring and control 		
Assessment Conclusion:	Closing of NCR was conducted on-site on 05/05/2023. The following evidence was verified:		

	<p>1) The temporary store has been dismantled and a centralised petrol store located at the main store compound is currently being used. The centralised store is also opened for workers to keep their petrol if needed. The deq store was also equipped with mitigation features such as concrete flooring & bunding, catchment sump, secondary containment, adequate ventilation, spill kit, and fire extinguisher. With regards to safety, labelling of containers and hazard signage were provided.</p> <p>2) Attendance record dated 14/04/2023 which was extracted from the Lintramax system that show workers have been briefed during a morning muster about the function of the new centralised store. It was attended by 214 workers.</p> <p>3) Internal audit report dated 17/04/2023 that shows an internal audit had been conducted on 12-13/04/2023 by the Sr Manager-Sustainability to ensure the adequacy of the newly prepared store.</p> <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p>
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Non-conformity			
NCR Ref #	2309739-202302-M3	Issued Date	24/02/2023
Due Date	25/05/2023	Closure Date	19/05/2023
Indicator & Category (Critical / Minor)	6.7.3 (Major)		
Statement of Nonconformity:	Wearing of appropriate PPE was not implemented by some workers.		
Requirement Reference:	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.		
Objective Evidence:	<p>1) In the HIRARC document, there is only one term used for feet protection i.e., "Safety Shoes" which can be the metal covered shoes or Wellington boots. It was observed that some tractor drivers were wearing metal covered shoes while some were wearing Wellington boots. This indicates the term used is unclear.</p> <p>2) During the site tour, some workers did not wear the appropriate PPE during performing their works according to the company's HIRARC and/or SOP such as the following:</p> <ul style="list-style-type: none"> i. GKBE: Grabber tractor driver was wearing Wellington boots instead of safety shoes. ii. GKBE: workshop foreman was wearing regular shoes instead of safety shoes without any reason iii. GTME: A harvester did not wear safety goggles while working iv. GTME: based on demonstration of putting on canvas to cover the FFB in the trailer, done by a contract FFB truck driver (reg. no. JOY 1185), it was 		

	<p>noted that he was having difficulty in wearing the safety harness and seemed to be unsure about where to attach it.</p> <p>v. GTBE: based on information given by the AM, the contract FFB transport drivers at the Chempedak Div. temporary collection centre who are assigned to deliver the FFB to GAIOM, on regular basis the drivers have climbed on top of the FFB which are filled in the bin in order to arrange the FFB and cover them with canvas, without using any safety harness, before leaving to GAIOM. This is not in-line with the required control measures spelt out in the HIRARC.</p>
<p>Corrections:</p>	<ul style="list-style-type: none"> - Amend the HIRARC and 'PPE procedure' accordingly for correct term of 'safety shoe' - Provide appropriate PPE (ie correct shoe type according to the job) based on the latest PPE procedure - Warning letter to the harvester due to his negligence not wearing PPEs (GTME) - Reminder letter to all the transporter contractor/drivers on wearing safety harness (GTME) - to install Safety Harness facility
<p>Root Cause Analysis:</p>	<ol style="list-style-type: none"> 1) Unclear term of 'safety shoe' at PPE Procedure, no consultation with SHO, caused HIRARC followed the same term too which caused inconsistent implementation on the ground 2) Lack of enforcement on PPE and correct PPE usage: <ol style="list-style-type: none"> i) unclear term of 'safety shoe' for tractor drivers ii) no spare shoe provided to the Foreman. Upon investigation, management found that his first pair of shoes was wet, therefore he left it at home iii) Safety Goggle was provided to the harvester, but he neglects to bring/use it due to harvesting Prime Palm (short palm) in the morning, while later evening he continues at tall palm area (GTME) iv) No monitoring/evaluation to the new lorry driver resulted him unfamiliar with the Safety Harness despite single training provided to him, which caused him failed to demonstrate the Safety Harness wearing (GTME) v) No facility provided to hook the Safety Harness due to interpretation 'Temporary Collection Centre'
<p>Corrective Actions:</p>	<ul style="list-style-type: none"> - Refer/consult Safety Health Officer (SHO) on any unclear terms at Safety Procedures; - Continue briefing/training on PPE & SOP to all the workers and lorry drivers; - Conduct evaluation of the training; - PPE monitoring checklist by the mandores/checkers to ensure all workers bring/wear the PPE.
<p>Assessment Conclusion:</p>	<p>Closing of NCR was conducted on-site on 05/05/2023. The following evidence was verified:</p> <ol style="list-style-type: none"> 1) Revised HIRARC and PPE procedure to distinguish the terms between safety shos and Wellington boots

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	<p>2) An inspection checklist (form no.: F/INSP/0004) for lorry and machinery drivers dated 04/03/2023 that shows the PPE checking is done by the field staff to ensure all PPE is worn.</p> <p>3) A warning letter dated 24/02/2023 to the harvester for not wearing adequate PPE while working and a reminder letter dated 25/02/2023 to the contractor for failing to make his worker familiar with safety harness wearing. The main purpose of the letters were to improve discipline in wearing PPE.</p> <p>4) During site visit at FFB collection centre at GTBE Chempedak Division, it was noted that the lifeline facility for safety harness has just been installed and has yet to be used. There was also no FFB loading operation to demonstrate the effectiveness of the facility and therefore this NC could not be closed on that day. Thus, the auditor requested for evidence in a form of video thereafter. The management later submitted videos to the auditor on 19/05/2023 that show lorry driver demonstrate the correct way of using the safety harness while working on top of a loaded lorry bin.</p> <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p>
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Non-conformity			
NCR Ref #	2309739-202302-M4	Issued Date	24/02/2023
Due Date	25/05/2023	Closure Date	19/05/2023
Indicator & Category (Critical / Minor)	7.2.10 (Major)		
Statement of Nonconformity:	The medical surveillance was not adequately followed up.		
Requirement Reference:	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.		
Objective Evidence:	At GSGE, the last medical surveillance for all the workers exposed to organophosphate was conducted on 19/10/2022. Two of the workers (passport no.: EGxxx6385 and Vxxx4123) were diagnosed to have restrictive lung disorder and requested by the Occupational Health Doctor to repeat a spirometry test on 17/11/2022. However, there was no evidence that shows those workers have been sent for the test.		
Corrections:	To obtain the medical surveillance report dated 17/11/22. (Note – the report was received on 05/03/23)		
Root Cause Analysis:	Repeat Spirometry Test were done on 17/11/2022 and the report received, but the estate unable to find/retrieve the report during the audit day/week due to the report was not immediately refiled after being used for other audit in the previous week.		
Corrective Actions:	To train the office clerk on proper filing for easy retrieval in future.		
Assessment Conclusion:	Closing of NCR was conducted on-site on 05/05/2023. The following evidence was verified:		

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	<p>1) Since the Repeat Spirometry Test report could not be found, the management has requested the OHD to resend a copy of the report. The copy was received on 05/03/2023 and made available for verification.</p> <p>2) Attendance record that shows the PIC for filing i.e., the admin staff have been briefed about proper filing of documents and how to ensure availability after the documents are used.</p> <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p>
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Non-conformity			
NCR Ref #	2309739-202302-M5	Issued Date	24/02/2023
Due Date	25/05/2023	Closure Date	19/05/2023
Indicator & Category (Critical / Minor)	7.3.2 (Major)		
Statement of Nonconformity:	The implementation of Waste Management Plan was not adequate.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<p>There were lapses in the implementation of the Waste Management Plan.</p> <p><u>Genting Ayer Item Oil Mill</u></p> <p>During the site visit at the mill housing complex’s domestic waste dumping bin, it was sighted that there were scheduled wastes that were not segregated and disposed in accordance with the waste management plans.</p> <p><u>Genting Sri Gading Estate</u></p> <p>During the site visit along Field 2018, it was noticed that the polybags used for seedlings during replanting were disposed all around the field. This was not in line with the document “List and Source of Pollutions – Genting Sri Gading Estate (Date: 16/01/2023) which states Source: Nursery Waste – Waste: Used Polybags – Method of Disposal: Disposed as Scheduled Waste.</p> <p><u>Genting Tebong Estate</u></p> <p>a. During the site visit at the Scheduled Waste Store, it was noticed that the required SW label sticker were not updated on its Date of Generation. This was not in accordance with Scheduled Waste Regulation 2005.</p> <p>b. During the assessment at the estate, it was verified that the SW110 – Electrical Waste were disposed via the Electrician appointed to repair electrical parts in the estate. There were no evidence of DOE License approval for the electrician to transport the SW Waste out of the estate’s premises.</p> <p>Due to this being a recurrence, therefore a Critical NC is raised.</p>		
Corrections:	<p>(GAIOM)</p> <p>1. Collect back the scheduled waste from the domestic waste bin, and dispose at scheduled waste store;</p>		

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	<p>(GSGE) 2a. To amend the "List & Source of Pollutions" plan accordingly to classify polybags as Recyclable Waste; 2b. To collect back the polybags from field and dispose at 'Recyclable Waste Store'.</p> <p>(GTBE) 3a. Update the 'Date of Generation' accordingly at the labels/stickers on the bins; 3b. Retrain & brief the staffs and electrician that the 'electric/electronic waste' are classified as schedule waste, generated by the estate, and that they shall not be brought outside the estate.</p>
<p>Root Cause Analysis:</p>	<p>(GAIOM) Inadequate training to workers, and lack of monitoring by the management on Scheduled Waste management;</p> <p>(GSGE) The polybags were wrongly classified as Scheduled Waste instead of Recyclable Waste at the List and Source of Pollutions; No monitoring on the recovery of the polybags - after planting works completed.</p> <p>(GTBE) Inadequate training to the newly recruited staff/store keeper; Appointed Electrician have lack of knowledge and awareness on schedule waste management.</p>
<p>Corrective Actions:</p>	<p>(GAIOM) Training all employees on scheduled waste management;</p> <p>(GSGE) Any future amendment on the Pollution List/Waste Management plan, shall be submitted to Sustainability Dept for verification; Briefing/training to Field Staff to collect back the polybags after planting.</p> <p>(GTBE) (a) Training to the Store Keeper; (b) Monitoring on the electrician/electrical waste handling - by the Assistant Managers.</p> <p>The above actions to be checked during the Sustainability Internal Audit.</p>
<p>Assessment Conclusion:</p>	<p>Closing of NCR was conducted on-site on 05/05/2023. The following evidence was verified: GAIOM</p> <ul style="list-style-type: none"> - Scheduled wastes in the domestic waste bin had been transferred to scheduled wastes store - Inventory records in accordance to DOE's Schedule V had been updated that shows the SW from the domestic waste bin was included

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	<ul style="list-style-type: none"> - Attendance record dated 02/03/2023 that shows PIC have been re-trained on SW management <p>GSGE:</p> <ul style="list-style-type: none"> - Amended "List & Source of Pollutions" dated 08/03/2023 and updated Wastes Management Plan dated 08/03/2023 that show the used polybags generated from nursery activity has been reclassified from SW to recyclable waste - Used polybags had been collected and stored at recyclable waste store - Attendance record dated 12/04/2023 that shows PIC have been re-trained on used polybags management <p>GTBE:</p> <ul style="list-style-type: none"> - Attendance record dated 10/04/2023 that shows the PIC have been trained on monitoring on the electrician/electrical wastes handling and also the correct labelling of SW containers - Electrical wastes have been collected and stored in the SW store - The dates of generation on SW labels have been corrected <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p>
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Non-conformity			
NCR Ref #	2309739-202302-M6	Issued Date	24/02/2023
Due Date	25/05/2023	Closure Date	19/05/2023
Indicator & Category (Critical / Minor)	7.8.2 (Major)		
Statement of Nonconformity:	The buffer zone at GKBE was not established effectively.		
Requirement Reference:	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.		
Objective Evidence:	During the site visit at the riparian zones at GKBE, it was sighted that the riparian zone was not effectively maintained or restored. Erosion overtime has resulted in the riparian zone width being smaller. Nevertheless, there were no evidence of riparian restoration being done. Furthermore, there were evidence of chemical application done to palms located close to the riverbanks.		
Corrections:	1) To identify the new buffer zone (for the erosion areas) by Mar'23; 2) All palms within the buffer zone to be marked/ring painted in 'red colour' by Apr 2023;		

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	3) The staff in-charge and the workers to be briefed/trained on the Riparian Zone Management.
Root Cause Analysis:	<ol style="list-style-type: none"> 1) The buffer zone became smaller due to erosion. 2) Only alternate palms within the buffer zone were marked - which caused no clear direction/specific briefing that the last palm shall not be sprayed.
Corrective Actions:	<ol style="list-style-type: none"> 1) Estate management to monitor the 'new width' of the rivers at erosion prone areas. Annual monitoring based on 'fallen palms' or during SPH (stand per ha) calculation 2) Continue the annual training to the sprayers and manuring team that 'all the marked palms' shall not be sprayed/manured
Assessment Conclusion:	<p>Closing of NCR was conducted on-site on 05/05/2023. The following evidence was verified:</p> <ol style="list-style-type: none"> 1) Riparian zone boundary had been revised to suit the change of zone width due to soil erosion of river bank. The marking of the zone was done by painting the oil palms trunk with red colour. 2) Attendance record dated 18/04/2023 that shows the pesticides spraying operators have been re-trained on the restriction of chemical application in the buffer zones. <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p>

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	N/A

3.3.1 Status of Nonconformities Previously Identified and Observations

Previous Non-conformity												
NCR Ref #	2165594-202202-M1	Issued Date	25/02/2022									
Due Date	25/05/2022	Closure Date	20/05/2022									
Indicator & 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. 6. Removed and disposed all the damaged harvesting equipment from the line site immediately. 											
Root Cause Analysis:	<table border="1"> <tbody> <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</td> </tr> </tbody> </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
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.
<p>Corrective Actions:</p>	<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. 	
<p>Assessment Conclusion:</p>	<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. Damaged harvesting equipment have all been cleared by 18/03/2022. 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. The management have placed a permanent line sweeper to ensure cleanliness of the linesite. This was evident in the sampled master chits. 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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Effectiveness Closure (for previous audit closed Critical NC):	<p>GKBE appointed Othman Mohd. Nor, Hospital Assistant as Person In-Charge of Accommodation, Safety and Amenities for Workers Housing as per letter dated 1/2/2023. Inspection conducted weekly as per records of Line Site Check List Genting Kulai Besar Estate (GKBE) which include the inspected area as following:</p> <ul style="list-style-type: none"> - Cleanliness - Drainage - Rubbish Collection - Bathroom/Septic Tank <p>GKBE latest inspection was conducted on 18/2/2023, GAIOM on 13/2/2023 GTME latest VMO visit was conducted on 17/2/2023 by Dr. Mahendran of Klinik Asia, Tangkak.</p> <p>No recurrence of issue hence, Major NC remained closed.</p>
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Previous Non-conformity			
NCR Ref #	2165594-202202-M2	Issued Date	25/02/2022
Due Date	25/05/2022	Closure Date	20/05/2022
Indicator & 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:	<p><u>Critical NC Close Out Verification</u></p> <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 		

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	<p>verification.</p> <p>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.</p> <p>3. Office Clerks were trained on Checkroll, Salary Payments and Workers EPF Contribution on 18/03/2022. Records of training were available for verification.</p> <p>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> <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>
Effectiveness Closure (for previous audit closed Critical NC):	<p>GKBE appointed Othman Mohd. Nor, Hospital Assistant as Person In-Charge of Accommodation, Safety and Amenities for Workers Housing as per letter dated 1/2/2023. Inspection conducted weekly as per records of Line Site Check List Genting Kulai Besar Estate (GKBE) which include the inspected area as following:</p> <ul style="list-style-type: none"> - Cleanliness - Drainage - Rubbish Collection - Bathroom/Septic Tank <p>GKBE latest inspection was conducted on 18/2/2023, GAIOM on 13/2/2023 GTME latest VMO visit was conducted on 17/2/2023 by Dr. Mahendran of Klinik Asia, Tangkak.</p> <p>No recurrence of issue hence, Major NC remained closed.</p>

Non-conformity			
NCR Ref #	2165594-202202-N1	Issued Date	25/02/2022
Due Date	ASA 1_3	Closure Date	24/02/2023
Indicator & 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>		

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	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.
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.
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. Based on the assessments conducted, the assessor has recommended specific actions for identified social aspects and impacts to be implement and monitor by operating units. All operating units established their individual Social Management and Monitoring Plan with action procedures and responsibilities for implementation which were monitored and updated periodically. Sighted the documented records of the plans with implementation status latest updated on 10/02/2023. No recurrence of issue hence, Minor NC has been closed on 24/02/2023.
Effectiveness Closure (for previous audit closed Critical NC):	N/A

Non-conformity			
NCR Ref #	2165594-202202-N2	Issued Date	25/02/2022
Due Date	ASA 1_3	Closure Date	24/02/2023
Indicator & 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:	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>		

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	<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:	<ol style="list-style-type: none"> 1. Refresher training for HA on identifying and replenishing expired items in the First Aid Box. 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:	<p>Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity.</p> <p>The following evidence was verified:</p> <ul style="list-style-type: none"> - Several first aid kits were inspected at various workstations such as harvesting, chemical spraying, workshops, and stores at all the sampled estates. All the contents were found to be in order and none of the items found to be expired. List of items was documented and attached in the first aid kits with information about the expiry dates. - Records of training for HA on identifying and replenishing the expired items in first aid kit were maintained and made available for verification. The HA were able to describe the method of monitoring the expiry dates of the items and action to be taken should the dates is approaching. - Checking of the items was also made as one of the criteria in the workplace inspection checklist. The PICs of the workplace inspection were able to describe the action to be taken should any lapses found with regards to the items such as expiry dates and quantity. <p>The implementation evidence of corrections and corrective actions were found to be effective and there was no recurrence of non-conformity against this indicator. Thus, the NC is closed on 24/02/2023.</p>
Effectiveness Closure (for previous audit closed Critical NC):	N/A

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Non-conformity			
NCR Ref #	2165594-202202-N3	Issued Date	25/02/2022
Due Date	ASA 1_3	Closure Date	Escalated to Critical
Indicator & 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 "All SWs are to be orderly and safely stored in an appropriate designated SWs store pending disposal." 		
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 Storekeeper & 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:	<p>Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity.</p> <p>Based on interview and site verification, it was noted that the proper disposal of wastes was understood by the workers and management. Scheduled Waste was disposed via licensed waste manager and records of disposal was available.</p> <p>Verified the disposal of clinical waste at GTME. The waste was stored at the clinic in a dedicated container labelled SW404. The Clinical Waste was disposed as below:</p> <ol style="list-style-type: none"> a. SW404 – Clinical Waste; Consignment Note Number: 2022102709YCSN1W; Date: 27/10/2022; Quantity: 0.0067; Facility: Kualiti Alam Sdn Bhd. <p>The HA has been trained on the Waste Management Plan and methods of disposal of clinical waste. Training records were available for verification.</p>		

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	<p>Nevertheless, lapses in the implementation of the Waste Management Plan were identified during the assessment. Evidence as below.</p> <p><u>Genting Ayer Item Oil Mill</u></p> <p>a. During the site visit at the mill housing complex’s domestic waste dumping bin, it was sighted that there were recyclable waste and scheduled waste that were not segregated and disposed in accordance with the waste management plans.</p> <p><u>Genting Sri Gading Estate</u></p> <p>- During the site visit along Field 2018, it was noticed that the polybags used for seedlings during replanting were disposed all around the field. This was not in line with the document “List and Source of Pollutions – Genting Sri Gading Estate (Date: 16/01/2023) which states Source: Nursery Waste – Waste: Used Polybags – Method of Disposal: Disposed as Scheduled Waste.</p> <p><u>Genting Tebong Estate</u></p> <p>a. During the site visit at the Scheduled Waste Store, it was noticed that the required SW label sticker were not updated on its Date of Generation. This was not in accordance with Scheduled Waste Regulation 2005.</p> <p>b. During the assessment at the estate, it was verified that the SW110 – Electrical Waste were disposed via the Electrician appointed to repair electrical parts in the estate. There were no evidence of DOE License approval for the electrician to transport the SW Waste out of the estate’s premises.</p> <p>Due to the minor not being able to be closed, therefore a Critical NC is raised.</p>
Effectiveness Closure (for previous audit closed Critical NC):	N/A

Non-conformity			
NCR Ref #	2165594-202202-N4	Issued Date	25/02/2022
Due Date	20/02/2023	Closure Date	Escalated to Critical
Indicator & 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		

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	<p>that these conditions are compiled by the contractors.</p> <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. - 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.
Corrective Actions:	<p>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 3rd party contractors.</p>
Assessment Conclusion:	<p>Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity.</p> <p>Based on sample GSGE FFB Transporter/Contractor: Hiap Soon Trading Co. worker’s work agreement of Employee ID: XX-XX05 (Mohd. Khairudin Bin Prayet; IC: 811111-01-6005); Position: Pekerja Harian/Borong/Pajak; Date: 2015, it was found the following:</p> <ul style="list-style-type: none"> - No specific date of agreement except year 2015 only - No specific work hour written in the agreement - Only public holiday entitlement of 5 days specified in the agreement, but no annual leave and sick leave entitlement specified in the agreement - Worker will be paid RM3.30 per MT FFB for transport of FFB from GSGE to GAIOM - Worker will be paid RM15.00 per trip if transporting FFB from GSGE to GAIOM on Sunday <p>Sample payslips of the same workers indicated the following:</p> <ul style="list-style-type: none"> - Payslip (Harvesters) # 2275; Month/Year: Jun’22; Name: Khairudin; Normal Working Days: 31; Field # 38; Bunches/MT: 472.55; Rate: 3.30; Amount: 1559.42; Wages 1559.42 (RM); SGP: 200 (RM); Allowances: 242.06 (RM); Total: 2001.48 (RM); Deductions – Advance: 1000 (RM); EPF: 141 (RM); SOCSO: 7.75 (RM); Total (deductions): 1148.75 (RM); Net Pay: 852.73 (RM); Date: 7/2/2022 - Payslip (Harvesters) # 2622; Month/Year: Aug’22; Name: Khairudin; Normal Working Days: 31; Field # 42; Bunches/MT: 549.58; Rate: 3.30; Amount: 1813.61; Wages 1813.61 (RM); SGP: 200 (RM); Allowances: 457.09 (RM); Total: 2470.70 (RM); Deductions – Advance: 250 (RM); EPF: 201 (RM); SOCSO: 9.25 (RM); Total (deductions): 460.25 (RM); Net Pay: 2010.45 (RM); Date: 7/9/2022 - Payslip (Harvesters) # 2646; Month/Year: Dec’22; Name: Khairudin; Normal Working Days: 31; Field # 45; Bunches/MT: 581.51; Rate: 3.30; Amount: 1918.98; Wages 1918.98 (RM); SGP: 200 (RM); Allowances: 212.65 (RM); Total: 2331.63 (RM); Deductions – Advance: 500 (RM); EPF: 212 (RM); SOCSO: 9.75 (RM); Total (deductions): 721.75 (RM); Net Pay: 1609.88 (RM); Date: 7/1/2023 <p>Based on the sample payslips, it was found the following:</p> <ul style="list-style-type: none"> - Number of workdays for month of June 2022 was specified as 31 despite there are only 30 days in June 2022 - No clear indication of legal Labour Act requirement that requires double pay for rest-day work and triple pay for public-holiday work despite the number of work days for all samples are full 31 days of the month with supposedly 1 day a week

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	<p>of off-day and at least 1 entitled public holiday each for month of June 2022 and August 2022</p> <ul style="list-style-type: none"> - Allowances paid not clearly described and included in the work agreement <p>Hence, a Major NC has been raised due to the matter and recurrence of issue within same indicator.</p>
<p>Effectiveness Closure (for previous audit closed Critical NC):</p>	<p>N/A</p>

Opportunity for Improvement	
OFI#	Description
2165594-202202-I1	<p>OFI Statement: 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 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. It can be further improved by the management to assist union to communicate benefit of joining union and registered union that available.</p> <p>Verification / Follow-up actions: Communications of policy made mainly during daily muster briefings and workers meetings as per sample as following:</p> <ul style="list-style-type: none"> - GKBE NUPW Meeting with Workers date: 17/1/2023 - GAIOM workers employee voting date: 8/8/2022 - GAIOM NUPW Kluang Branch Meeting date: 14/2/2023 - GTME Workers Committee 2nd Meeting date: 15/12/2022
2165594-202202-I2	<p>OFI Statement: Clause: 1.1.5 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. 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> <p>Verification / Follow-up actions: Current list of stakeholders containing their nominated representatives contact and details available for internal and external stakeholders among local communities, authorities, vendors, neighbours and etc.</p>
2165594-202202-I3	<p>OFI Statement: Clause: 6.2.2 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> <p>Verification / Follow-up actions: Employment contracts detailing payments and conditions of employment available to the workers for sample employees sighted as per samples selected. Regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with Labour Act and Minimum Wages Order.</p>

<p>2165594-202202-I4</p>	<p>OFI Statement: Clause: 6.7.3 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 compared 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. <p>Verification / Follow-up actions: Based on field visit at the spraying operations at the sampled estates, the face mask cartridges were found to be clean, and workers were able to explain the right time or conditions to replace it. Tractor drivers were also found to be wearing earplugs while operating. With regards to safety shoes stated in the HIRARC, the term has not been clearly defined which has caused inconsistency of understanding among the users. Thus, this OFI is escalated to major non-conformity (refer to NC #2309739-202302-M3).</p>
<p>2165594-202202-I5</p>	<p>OFI Statement: 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. <p>Verification / Follow-up actions:</p> <ol style="list-style-type: none"> 1) There was no change made to address the condition of petrol store. Thus, a non-conformity was assigned under Indicator 3.6.2 (refer to NC #2309739-202302-M2) 2) Although GSRE was not sampled in this visit, the storage of Acephate at the other estates were found to be in-line with best practice. 3) Based on site visit, the grease and chlorine have been stored according to best practice, while the paint containers were classified as scheduled wastes and appropriately stored.
<p>2165594-202202-I6</p>	<p>OFI Statement: Clause: 7.7.5 Replanting will be conducted on 2024 (field P99C - 33.84 Ha) in Sing Mah Div, Genting Sungei Rayat Estate. 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>

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Verification / Follow-up actions:

Genting Plantation GSME Peat Drainability Report dated 15/02/2021 was verified. It was verified that the management has included the recommended contains as below:

Drainage base: 3.7m

Depth to drainage base: 7.0m-3.7m = 3.3m

Average Subsidence Rate: 5cm/year

(Note: As per the RSPO procedure, default subsidence rate of 5 cm/year must be used as average subsidence rate of the peatland replanting area)

Thus,

Drainage Limit Time (DLT): 330cm/5cm= 66 Years

Based on above calculation, DLT exceeds the Two-Crop Cycle Threshold (TCCT) at threshold 40 years. Thus, future replanting can proceed before reaching the natural gravity drainability limit for peat.

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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	Closed on 24/02/2023
2165594-202202-N2	Minor	6.7.2	25/02/2022	Closed on 24/02/2023
2165594-202202-N3	Minor	7.3.2	25/02/2022	Escalated to Critical
2165594-202202-N4	Minor	2.2.2	25/02/2022	Escalated to Critical
2309739-202302-M1	Critical	2.2.2	24/02/2023	Closed on 19/05/2023
2309739-202302-M2	Critical	3.6.2	24/02/2023	Closed on 19/05/2023
2309739-202302-M3	Critical	6.7.3	24/02/2023	Closed on 19/05/2023
2309739-202302-M4	Critical	7.2.10	24/02/2023	Closed on 19/05/2023
2309739-202302-M5	Critical	7.3.2	24/02/2023	Closed on 19/05/2023
2309739-202302-M6	Critical	7.8.2	24/02/2023	Closed on 19/05/2023

3.3.2 Summary of the Nonconformities and Status

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.

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)
Teacher/School representatives	- Headmaster, SJK(T) Ladang Kulai Besar - Headmaster, SK Bukit Banjar	Face to face interview
Local communities’ representatives	- Ketua Kampung Payamas - Ketua Kampung Orang Asli Bukit Putus	Face to face interview
Vendors	- Abu Bakar (Contractor) - Seringka Jaya (Supplier)	Face to face interview
Neighbours	- Cattle owners - Smallholders	Face to face interview
Gender committee representatives	- GKBE Gender Committee Chairperson	Face to face interview
Foreign workers representatives	- Indonesian workers representative - Bangladesh workers representative - India workers representative - Nepal workers representative	Face to face interview

Stakeholders comment	
1	<p>Feedbacks: Teacher/School representatives</p> <p>Having good relationship with estate management. No negative impact towards school from estate operations. Thanking estate management for contributions in school programs.</p>
	<p>Audit Team verification and response:</p> <p>No further issue.</p>
2	<p>Feedbacks: Local communities' representatives</p> <p>Having good relationship with estate management and staff. No negative impact towards school from estate operations but villagers get opportunity for employment in estate. No issue of land area boundary between estate and villagers.</p>
	<p>Audit Team verification and response:</p> <p>No further issue.</p>
3	<p>Feedbacks: Vendors</p> <p>Have long business relationship with Genting Plantation estates. Contract work awarded with proper agreements. Purchase order documents issued for all purchase of service and supplies. Payment made promptly as agreed. Local vendors given priority for service and supply.</p>
	<p>Audit Team verification and response:</p> <p>No further issue.</p>
4	<p>Feedbacks: Neighbours</p> <p>Management allows cattle owners for grazing in designated mature oil palm field with conditions agreed by both parties mainly not to let cattle graze in immature oil palm field. Boundaries between Genting Plantations estates and smallholders clearly demarcated via pegging and drain. Company's management allows use of estate roads to access smallholders lot.</p>
	<p>Audit Team verification and response:</p> <p>No further issue.</p>
5	<p>Feedbacks: Gender committee representatives</p> <p>Gender committee established in all operating units of Genting Plantation mainly to promote and instil awareness among all employees mainly women employees on their rights related to reproductive and others as well as violence and sexual harassment. No case of violence and sexual harassment happen since last audit. Proper channel of reporting made available by company in case of any happen.</p>
	<p>Audit Team verification and response:</p> <p>No further issue.</p>
6	<p>Feedbacks: Foreign workers representatives</p> <p>Foreign workers are given work contract for a period from 2 years up to 10 years long. Company started to conduct a zero-cost employment for all foreign workers for new intake since 2022. Work agreements are written in native languages depends on country of origin. Proper accommodation provided by company basic furniture available. Passport are kept by individual foreign worker with locker provided by company in their house.</p>
	<p>Audit Team verification and response:</p> <p>No further issue.</p>

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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	
	<p>Feedbacks: NA</p>
	<p>Audit Team verification and response: NA</p>



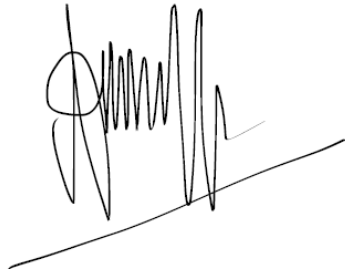
3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

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 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 is remain certified.

Report prepared by	Acceptance of Assessment Conclusion	
Name: Valence Shem	Name: James Chung Khim Hon	Name: Arunan Kandasamy
Company Name: BSI Services (Malaysia) Sdn Bhd	Company Name: Genting Plantations Berhad	Company Name: Genting Plantations Berhad
Title: Lead Auditor	Title: Senior Vice President - Group Processing	Title: Senior Vice President - Plantation (Malaysia)
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 	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: 22/05/2023	Date: 22/05/2023	Date: 22/05/2023

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>The mill and estates have issued the list of documents that could be requested by the stakeholders to all the relevant stakeholders of the mill.</p> <p>The stakeholders are required to register in Enquiry Register Book prior to access to the documents. The list of documents not limited to:</p> <ul style="list-style-type: none"> • Land title • Policies 	Complied

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		<ul style="list-style-type: none"> • Reports – EAI, SIA, HCV and audit reports • Management plans • Procedures 	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>As a group of company, GPB established communication to continue to use the internet to disseminate public information related to sustainability and relevant policies via website address as following:</p> <ul style="list-style-type: none"> - https://www.gentingplantations.com/sustainability/ - https://www.gentingplantations.com/sustainability/sustainability-policy/ <p>On-site, the mill and estates provided information in appropriate languages and accessible to relevant stakeholders upon request and during stakeholder consultation meetings.</p> <p>Interview conducted on-site with sampled internal and external stakeholders confirmed that the information provided in appropriate languages and accessible to them.</p> <p>Latest external stakeholder consultation meeting was conducted on 9/6/2022 at GAIOM. Managements from all operating units within GAIOM certification units combined to organize the meeting that was attended by local community representatives among neighboring resident area, schools, mosque, temple, vendors and authorities. The minutes of meeting records indicated that most of feedbacks from stakeholders during previous meeting have been addressed and updated to relevant stakeholders.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Since the last assessment, there has been no request for information related to environmental, social, and legal issues by any stakeholders.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p>	<p>Latest external stakeholder consultation meeting conducted by GAIOM in combination with all supply base estates on 9/6/2022 as per documented minutes of meeting i.e., Report on External Stakeholder Consultation and</p>	Complied

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	- Critical (Major) compliance -	Communication Meeting; Report date: 14/6/2022 and Update Status Report date: 16/1/2023. Additionally, there was an internal stakeholder consultation meeting as well as individual external stakeholders meeting conducted as following: - GSGE internal stakeholder meeting on 27/6/2022. - GTME external stakeholder meeting date: 13/10/2022 - GTME internal stakeholder meeting date: 13/9/2022	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	The latest Stakeholders Lists for all operating units within GAIOM CU sighted as updated in December 2022. Information of stakeholders' details available included person in charge, address, e-mail and contact number for various stakeholders' category among internal and external stakeholders including local communities, authorities, vendors and neighbours etc.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	The Ethical Conduct and Integrity Policy was developed and signed by President & COO dated 22/06/2015. The policy was communicated to the stakeholders including contractors and third-party during stakeholder meeting conducted on 9/6/2022. Ethical conduct implemented in outsource services as per sample contractors' agreements as following: - GSGE - Contractor: Lau Lam Piow; MOA: Memorandum of Agreement for Contractor (For Contracts with General Work Orders); Agreement # GSGE/GWO/23/01/01; Contract period: 1/1/2023 – 31/12/2023 - GTBE - Contractor: Premium Palms Sd. Bhd.; MOA: Loading and Transporting of Fresh Fruit Bunch (FFB) and Loose Fruit Agreement; Agreement # GTBE/TD/TPT/23/01/02PP; Contract period: 1/1/2023 – 31/12/2023 - GTBE - Contractor: Arumugam S/O Adekan; MOA: Fresh Fruit Bunch (FFB) Harvesting Agreement; Agreement # GTBE/CD/HC/23/01/01AA; Contract period: 1/1/2023 – 31/12/2023	Complied

1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>System to monitor compliance including internal audit conducted by GPB HQ sustainability personnel as per sample as following:</p> <ul style="list-style-type: none"> - GAIOM internal audit date: 5-6/12/2022 - GTME internal audit date: 27-28/12/2022 	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>The estates and mill continued to comply with the legal requirements whichever applicable. Compliance to the law and regulation is monitored by the operating units and sustainability team. Among the evidence of compliance verified were:</p> <p>GKBE:</p> <ol style="list-style-type: none"> 1) Diesel permit no. J004122, valid until 01/09/2024 2) MPOB license no. 508591102000 and 508595302000, both valid until 30/04/2023 <p>GAIOM:</p> <ol style="list-style-type: none"> 1) DOE License #JAS.JHQ.600-3/1/11(5), valid until 30/06/2023 2) CF Boiler No. 3, #JH PMD 965, valid until 10/07/2023 3) CF Boiler No. 4, #JH PMD 80902, valid until 30/04/2023 4) CF Steriliser No. 1, #PMT 47883, valid until 11/10/2023 5) CF Steriliser No. 3, #PMT 65743, valid until 30/04/2023 6) CF Air compressor No. 5, #JH PMT 15975, valid until 03/04/2023 7) MPOB license no. 500056704000, valid until 31/01/2024 <p>GSGE:</p>	Complied

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		<ul style="list-style-type: none"> 1) Diesel permit #P(J000319), valid until 27/03/2024 2) Weighbridge calibration #2.1KQ027317, valid until 19/09/2023 3) CF Compressor #PMT-JH/22 187478, valid until 07/12/2023 4) CF Labour quarters #HQ/A/P/KP.4/90, dated 13/02/1993 5) Permit to deduct electricity usage by workers #Bil(23)dIm.Buruh MB7/2/35/9 SJ.114 6) MPOB license #524435102000, valid until 31/10/2023 7) MPOB license # 508592902000, valid until 30/04/2023 <p>GTME:</p> <ul style="list-style-type: none"> 1) Weighbridge calibration #2.1KQ026403, valid until 10/06/2023 2) Weighbridge calibration #2.1KQ028570, valid until 23/05/2023 3) CF Compressor #JH PMT 17439, valid until 01/02/2023 – application for renewal was submitted on 29/12/2022 and inspection by DOSH was conducted on 16/02/2023 4) License to practice as Dresser, Reg. #13186, valid until 31/12/2023 5) Permit to deduct electricity usage by workers #JTKNJ.PMT/TK(NJ)11-21, dated 09/03/2021 <p>GTBE:</p> <ul style="list-style-type: none"> 1) Diesel permit # M000972, valid until 09/08/2024 2) MPOB license # 501667602000, valid until 31/03/2023 3) MPOB license # 501803202000, valid until 30/11/2023 	
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.	Documented system including Legal Requirements Register (Doc: SP-MGR-03-F01-0; Revision 08 dated 03/11/2021) is available. The content of the register as below:	Complied

	- Minor compliance -	<ol style="list-style-type: none"> 1. List of local legal requirements applicable to plantation and mill operations in Malaysia and East Malaysia. 2. List of international standards/requirements applicable to plantation operation in Malaysia: <ol style="list-style-type: none"> a. Part 1: Environment b. Part 2: Safety and Health c. Part 3: Social d. Part 4: Best Practices and other requirements e. Part 5: International Standards/Requirement <p>The sampled operating units have maintained a legal Requirement Register which consist of all updated and legal requirements that are applicable to their operations and available for verification.</p>	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>The sampled estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers at the estate visited confirmed that they were clearly marked and maintained. Besides that, based on site visits, the estates have also established a few methods of boundary demarcation such as fences, trenches, and boundary roads to distinguish the boundary with the adjacent stakeholders. All the demarcations were visibly maintained.</p>	Complied
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>GAIOM and its supply base maintain lists of all contracted parties. The list was available in the stakeholder list provided for verification during the assessment.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p>	<p>Genting Plantations Berhad has established Foreign Workers Ethical Responsible Recruitment Procedures; Doc. # GEN-13; Rev. 06; Issue date: 3/10/2022 which include the procedure of due diligence for foreign workers recruitment agency. Prior to appointment, the HR department together with Sustainability department will collaborate to conduct due diligence of</p>	Non-compliance

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	<p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>potential foreign workers recruitment agency. The due diligence includes assessment of required criteria as following:</p> <table border="1" data-bbox="1025 434 1899 845"> <thead> <tr> <th>#</th> <th>Category</th> <th>Criteria</th> <th>Points</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Legal, HR</td> <td>Demonstrates compliances to legal requirements</td> <td>20</td> </tr> <tr> <td>2</td> <td>Service overview</td> <td>Demonstrate ability to provide service</td> <td>20</td> </tr> <tr> <td>3</td> <td>Track record, reputation, financial capacity</td> <td>Demonstrates having a good track record, reputation, financial capacity</td> <td>20</td> </tr> <tr> <td>4</td> <td>Ethical recruitment practice</td> <td>Demonstrates having good ethical recruitment practice</td> <td>100</td> </tr> </tbody> </table> <p>Based on the assessments category and criteria, agency with score from 128 or 80% and above will be considered to be appointed as the recruitment agency. Sighted two samples assessment of Indonesian Workers Recruitment Agency that has been shortlisted for appointment as following:</p> <ul style="list-style-type: none"> - PT PrimaDaya Pratama Pandukarya; Score: 145 (90.63%) - PT MitraHarta Insani; Score: 134 (83.75 %) <p>For other service providers, The Memorandum of Agreement (MOA) were available for verification for all contracted parties with the mill and estates. The MOA contains specific clause on meeting applicable legal requirements. Verified the sampled MOA as per sample GAIOM for vendor Ad Skill Solutions Sdn. Bhd;. Date: 17/3/2022:</p> <ul style="list-style-type: none"> - Third Party Acknowledgement Letter - Third Party Due Diligence Questionnaire of Code of Business Conduct for Third Parties <p>Verified too, a sample GSGE for FFB and Loose Fruit Transporter as following:</p>	#	Category	Criteria	Points	1	Legal, HR	Demonstrates compliances to legal requirements	20	2	Service overview	Demonstrate ability to provide service	20	3	Track record, reputation, financial capacity	Demonstrates having a good track record, reputation, financial capacity	20	4	Ethical recruitment practice	Demonstrates having good ethical recruitment practice	100	
#	Category	Criteria	Points																				
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4	Ethical recruitment practice	Demonstrates having good ethical recruitment practice	100																				

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		<ul style="list-style-type: none"> - Contractor/Transporter: Sin Huat Membaiki Kereta & Motor; Agreement # GSGE/TC/23/01/02; Date: 1/1/2013 - Based on sample GSGE FFB Transporter/Contractor: Hiap Soon Trading Co. worker’s work agreement of Employee ID: XX-XX05; Position: Pekerja Harian/Borong/Pajak; Date: 2015, it was found the following: <ul style="list-style-type: none"> - No specific date of agreement except year 2015 only - No specific work hour written in the agreement - Only public holiday entitlement of 5 days specified in the agreement, but no annual leave and sick leave entitlement specified in the agreement - Worker will be paid RM3.30 per MT FFB for transport of FFB from GSGE to GAIOM - Worker will be paid RM15.00 per trip if transporting FFB from GSGE to GAIOM on Sunday Sample payslips of the same workers indicated the following: <ul style="list-style-type: none"> - Payslip (Harvesters) # 2275; Month/Year: Jun’22; Name: Khairudin; Normal Working Days: 31; Field # 38; Bunches/MT: 472.55; Rate: 3.30; Amount: 1559.42; Wages 1559.42 (RM); SGP: 200 (RM); Allowances: 242.06 (RM); Total: 2001.48 (RM); Deductions – Advance: 1000 (RM); EPF: 141 (RM); SOCSO: 7.75 (RM); Total (deductions): 1148.75 (RM); Net Pay: 852.73 (RM); Date: 7/2/2022 - Payslip (Harvesters) # 2622; Month/Year: Aug’22; Name: Khairudin; Normal Working Days: 31; Field # 42; Bunches/MT: 549.58; Rate: 3.30; Amount: 1813.61; Wages 1813.61 (RM); SGP: 200 (RM); Allowances: 457.09 (RM); Total: 2470.70 (RM); Deductions – Advance: 250 (RM); EPF: 201 (RM); SOCSO: 9.25 (RM); Total (deductions): 460.25 (RM); Net Pay: 2010.45 (RM); Date: 7/9/2022 - Payslip (Harvesters) # 2646; Month/Year: Dec’22; Name: Khairudin; Normal Working Days: 31; Field # 45; Bunches/MT: 581.51; Rate: 3.30; Amount: 1918.98; Wages 1918.98 (RM); SGP: 200 (RM); Allowances: 	
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		<p>212.65 (RM); Total: 2331.63 (RM); Deductions – Advance: 500 (RM); EPF: 212 (RM); SOCSO: 9.75 (RM); Total (deductions): 721.75 (RM); Net Pay: 1609.88 (RM); Date: 7/1/2023</p> <p>Based on the sample payslips, it was found the following:</p> <ul style="list-style-type: none"> - Number of workdays for month of June 2022 was specified as 31 despite there are only 30 days in June 2022 - No clear indication of legal Labour Act requirement that requires double pay for rest-day work and triple pay for public-holiday work despite the number of work days for all samples are full 31 days of the month with supposedly 1 day a week of off-day and at least 1 entitled public holiday each for month of June 2022 and August 2022 - Allowances paid not clearly described and included in the work agreement <p>Hence, a Major NC has been raised due to the matter and recurrence of issue within same indicator.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>The Memorandum of Agreement (MOA) was available for verification for all contracted parties with the mill and estates. The MOA includes specific clause disallowing child, forced and trafficked labour. Verified the sampled MOA/Additional Addendum for sample GAIOM CPO Transporter as following:</p> <ul style="list-style-type: none"> - Contractor/Transporter: Teo Tuan Kwee Sdn. Bhd.; Employee ID: XX-XX63; Position: Tanker Driver; Date: 16/4/2013 <p>Also verified a sample work agreement of GSGE FFB Transporter/Contractor as following:</p> <p>Contractor: Hiap Soon Trading Co.; Employee ID: XX-XX05; Position: Pekerja Harian/Borong/Pajak; Date: 2015</p>	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins 	<p>There is no crop from third party received by the mill. All the directly sourced FFB are only from GPB’s certified estates. GPB has the evidence of ownership</p>	Complied

	<ul style="list-style-type: none"> 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>	and MPOB licenses for all the estates. Information on the geo-locations of each estates are also available as mentioned in Table 4 of this report.																																			
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>	The certification unit does not and is not planning to source any FFB indirectly. Thus, this Indicator is not applicable.	Not Applicable																																		
Principle 3: Optimise productivity, efficiency, positive impacts and resilience																																					
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.																																					
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	The business or management plan of the operating units is addressed in the annual budget with 5-year projection plan (2023 to 2028). The palm oil mill budget includes the projected FFB processed, CPO and PK production, OER and KER, production cost, training, insurance, environment conservation, while the includes Crop Projection, Mature Upkeep Cost, Manuring Cost, Harvesting Cost, Transport cost, General Charges, and Capital Expenditure to name a few.	Complied																																		
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>Annual replanting programmes, which are reviewed annually, were available at each sampled estates and the details are summarised as follows:</p> <table border="1"> <thead> <tr> <th rowspan="2">Estates</th> <th colspan="6">Area (Ha)</th> </tr> <tr> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> <th>2028</th> </tr> </thead> <tbody> <tr> <td>GKBE</td> <td>98.45</td> <td>119.34</td> <td>70.62</td> <td>94.94</td> <td>32.13</td> <td>31.17</td> </tr> <tr> <td>GSGE</td> <td>147.10</td> <td>0</td> <td>0</td> <td>253.29</td> <td>181.42</td> <td>121.87</td> </tr> <tr> <td>GTME</td> <td>178.50</td> <td>138.42</td> <td>134.71</td> <td>81.29</td> <td>281.09</td> <td>71.03</td> </tr> </tbody> </table>	Estates	Area (Ha)						2023	2024	2025	2026	2027	2028	GKBE	98.45	119.34	70.62	94.94	32.13	31.17	GSGE	147.10	0	0	253.29	181.42	121.87	GTME	178.50	138.42	134.71	81.29	281.09	71.03	Complied
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		GTBE	310.40	197.93	144.98	140.41	0	0	
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>The certification unit held its last management review meeting on 16/01/2023 in accordance with the Sustainability Management Procedure Manual: Management Review [ref.: doc. no. SMP-GPB-06, rev. 3, dated 27/07/2020]. It was attended by 18 key personnel and chaired by the Sr. Manager, Sustainability). The minutes of meeting were made available at each sampled operating unit for verification. Among the agenda recorded in the minutes were:</p> <ol style="list-style-type: none"> 1) Minutes / Actions of previous meeting 2) RSPO, MSPO & ISCC Audit schedule and Certification Status 3) Changes and Improvement on Sustainability Management System 4) Results of internal audits 5) Complaints and Grievances 6) Enquiry Register 7) Stakeholder Meeting/ Minutes 8) Greenhouse Gas 9) Resource and Training Requirements 10) Sustainability Policies 11) Review of effectiveness in achieving quality, environmental, social, safety and health objectives 12) Compliance to legal requirements 13) Supply Chain and Traceability 14) Preventive and Corrective Actions 							Complied
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>									

<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Continuous improvement verified being implemented in each operating unit as per sample for GKBE as per Memorandum dated 25/11/022 from Genting Plantations Vice President – Finance to Senior Vice President – Plantation (Malaysia) 2023 Approved Budget with Capital Expenditure for Category of WIP Building Residential as following:</p> <ul style="list-style-type: none"> - 4 blocks x 4 units labour quarters (bachelor) - 1 block x 4 units labour quarters (married) - 1 block x 4 units AP quarters - 1 block x 4 units staff quarters - 1 block x 2 unis assistant manager house - 1 manager bungalow <p>Based on the records of GTBE Detail of Capital Expenditure Costs for Fiscal Year 2023, Version 02 (01/01/2023 to 31/12/2023) a sum of capital budget has been approved for following:</p> <ul style="list-style-type: none"> - Capex Category: BLR-OU (Building-Residential) for repair and renovations of existing 12 blocks x 2 units labour quarters - Capex Category: WBR (WIP Building Residential) for constructions of new 2 blocks x 4 new labour quarters <p>Areas in visited labour quarters were found in good conditions while preparation of the capital budget work to be kick-off in 2nd quarter of 2023. All estates and mill have established improvement plans to guide and ensure environmental impacts are continuously minimised. The mill and estates have established Waste Management Plan, IPM Management Plans, Water Management Plans, Pollution Prevention Plans and HCV & Biodiversity Management Plans among others. The implementation of the management plans was monitored and verified during the assessment. Sampled the implementations as below:</p> <ol style="list-style-type: none"> 1. Increase of barn owl box ratio according to Oil Palm Manual. 	<p>Complied</p>
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		<ol style="list-style-type: none"> 2. Increase of planting area for beneficial plant 3. Disposal of Waste Materials in accordance with SW Regulation 2005. 4. Water Quality Monitoring for Incoming and Outgoing River Water. 5. Monitoring of HCV and Biodiversity Areas. 6. Mill monitoring of Smoke Emission. 	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>The certification unit has completed its RSPO metric template version 2.1 and submitted to the CB prior to the assessment date. Based on verification with input data against various documents such as area statement, land titles, production reports, JKPP 8 forms, Lintramax system to name a few, there were no discrepancies of data reported for the period under review.</p>	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>The estate operations are guided by Genting Plantation Berhad’s Oil Palm Manual. Among the operations covers in the manual are:</p> <ul style="list-style-type: none"> - Land clearing, preparation, planting, and legume covers establishment - Oil palm nursery - Planting density and technique - Soil conservation and terracing - Pest and diseases - Weed management - Manuring 	Complied

		<ul style="list-style-type: none"> - Palm replacement during immaturity - Roads and drainage - Pruning - Harvesting and evacuation - Crop forecast - Managing difficult soils <p>The OPMs are updated from time to time to suit the current needs.</p> <p>While the mill has documented its operation procedure in a multi-level document such as Procedure Manual, System Procedure, Standard Operating Manual, Safe Operating Procedure, and Environmental Control Procedure, covering all workstations from FFB reception until dispatch of CPO/PK.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>Apart from daily routine supervision, Genting Plantations Berhad has established mechanism to monitor the implementation of their procedure by visit from Group Plantation Advisory, Agronomist and Sustainability Department, internal audits, and workplace inspection by Safety Officer.</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Among the records of monitoring made available by the operating units were, Internal audit report, PA visit report, Agronomists visit report, and Workplace inspection report, to name a few.</p>	Complied
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting in all visited estates within GAIOM supply bases. This is verified through the following document/facts.</p> <ol style="list-style-type: none"> 1. Hectare statement compared to the previous year. 2. Interviews with the management 3. Field visits and verification. <p>For existing operations, the SIA conducted as per reports as following:</p>	Complied

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		<ul style="list-style-type: none"> - RSPO, MSPO & ISCC Social Impact Assessment (SIA) Report GKBE, GSRE & GAIOM; Assessment by: P. Sivaji Raja, Manager – Sustainability Department; Date: 29/1/2021; Assessment period: 13-30/12/2020 - RSPO, MSPO & ISCC Social Impact Assessment (SIA) Report GKBE, GSRE & GAIOM; Assessment by: P. Sivaji Raja, Manager – Sustainability Department; Date: 28/1/2020; Assessment period: 13-21/3/2019 <p>The assessments were undertaken through a participatory methodology involving affected stakeholders among internal and external to GAIOM certification units.</p> <p>The sampled estates have conducted Environmental Aspect and Impact Assessment for estates operation prepared and reviewed by Assistant Managers and approved by Estate Managers. Available guidance on EIA-Score, ranking and etc which consistently applied in the assessment.</p> <p>The SOP of Environmental Aspect and Impact (EIA) (SMP-GPB-29) Rev. 01 dated 06/06/18 under Para 7.3 and Environmental Aspect and Impact Register (SP-MGR-02-F01-1) available for verification.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Based on the assessments conducted, the assessor has recommended specific actions for identified social aspects and impacts to be implement and monitor by operating units. All operating units established their individual Social Management and Monitoring Plan with action procedures and responsibilities for implementation which were monitored and updated periodically. Sighted the documented records of the plans with implementation status latest updated on 10/2/2023. Among the plan including the following:</p> <ul style="list-style-type: none"> - Monitoring and updating of legality documents of foreign workers - Monitoring of workers minimum wages in-line with legal requirements <p>Monitoring of feedbacks and/or complaints by internal and external stakeholders with action to be taken, if necessary, etc.</p>	Complied

		<p>All estates and mill have established environment management plans to guide and ensure environmental impacts are continuously minimised. The environment management plans consist of Waste Management Plan, IPM Management Plans, Water Management Plans, Pollution Prevention Plans and HCV & Biodiversity Management Plans among others. The implementation of the management plans was monitored and verified during the assessment. Sampled the implementations as below:</p> <ol style="list-style-type: none"> 1. Increase of barn owl box ratio according to Oil Palm Manual. 2. Increase of planting area for beneficial plant 3. Disposal of Waste Materials in accordance with SW Regulation 2005. 4. Water Quality Monitoring for Incoming and Outgoing River Water. 5. Monitoring of HCV and Biodiversity Areas. 6. Mill monitoring of Smoke Emission. 	
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>There social management and monitoring plan is implemented, reviewed, and updated regularly in a participatory way for each operating unit mainly during stakeholder consultation meeting as following:</p> <ul style="list-style-type: none"> - GAIOM certification units combined external stakeholders meeting; date: 9/6/2022 - GSGE internal stakeholder meeting; date: 27/6/2022. - GTME external stakeholder meeting; date: 13/10/2022 - GTME internal stakeholder meeting; date: 13/9/2022 <p>Environmental Management Plans were developed, consisting of Waste Management Plan, Water Management Plan, HCV Area & Biodiversity, Pollution Prevention Plan and IPM Management Plans which were available for verification. Among the implantation of the environment management plan were mainly focused on environmental conservations and reductions of pesticides and fossil fuels. Among the implementation that were verified included the implementation of IPM in the estates such as the well-</p>	Complied

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		established beneficial plants, segregation of waste and disposal in accordance with legal requirements, quarterly monitoring of smoke emission at the mill, well established buffer zones and periodic water quality monitoring among others. The Environment Management Plan is reviewed yearly, usually at the beginning of the year with inputs obtained from the management and workers representatives.	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	Genting Plantations Berhad has developed Foreign Workers Ethical Responsible Recruitment Procedures; Doc. # GEN-13; Rev. 06; Issue date: 3/10/2022 to establish control procedures on the employment of foreign workers. Recruitment, selection and termination/retirements process was clearly outlined in the procedure. Additionally, there is Procedure Manual Manpower Recruitment and Orientation; Doc. # PM-MR-02; Rev. 00; Issue date: 2/1/2018 for local workers recruitment been established. Furthermore, criteria for promotion were outlined in Procedures for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021).	Complied
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	There is evidence that employment procedure established has been implemented effectively for both foreign and local workers. For local workers, prior to employment, the worker can directly submit application to apply for job either in the estate or mill. The Mill/Estate Manager will interview the worker and decide whether suitable or not for employment. Photocopy of identification card and resume are kept in the personal file for all workers. For foreign workers, recruitment agency is appointed for the recruitment process.	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			

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<p>3.6.1</p>	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -</p>	<p>The mill and estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following:</p> <ul style="list-style-type: none"> - Change in work process - Revision/changes in legislative requirement - Occurrence of accidents <p>Appropriate risk control measures were determined and implemented for the respective activities and operation. CHRA was last conducted at the sampled operating unit as follows:</p> <table border="1" data-bbox="1025 758 1917 1136"> <thead> <tr> <th>Operating units</th> <th>Date of report</th> <th>Report ref. No.</th> <th>Assessor Reg. No.</th> </tr> </thead> <tbody> <tr> <td>GKBE</td> <td>June 2022</td> <td>JKKP HQ/12/ASS/00/309-2022/07</td> <td>HQ/12/ASS/00/309</td> </tr> <tr> <td>GAIOM</td> <td>July 2018</td> <td>JKKP HIE 127/171-2(154)-2018/025</td> <td>HQ/12/ASS/00/309</td> </tr> <tr> <td>GSGE</td> <td>June 2022</td> <td>JKKP HQ/12/ASS/00/309-2022/005</td> <td>HQ/12/ASS/00/309</td> </tr> <tr> <td>GTME</td> <td>July 2022</td> <td>JKKP HQ/12/ASS/00/309-2022/004</td> <td>HQ/12/ASS/00/309</td> </tr> </tbody> </table>	Operating units	Date of report	Report ref. No.	Assessor Reg. No.	GKBE	June 2022	JKKP HQ/12/ASS/00/309-2022/07	HQ/12/ASS/00/309	GAIOM	July 2018	JKKP HIE 127/171-2(154)-2018/025	HQ/12/ASS/00/309	GSGE	June 2022	JKKP HQ/12/ASS/00/309-2022/005	HQ/12/ASS/00/309	GTME	July 2022	JKKP HQ/12/ASS/00/309-2022/004	HQ/12/ASS/00/309	<p>Complied</p>
Operating units	Date of report	Report ref. No.	Assessor Reg. No.																				
GKBE	June 2022	JKKP HQ/12/ASS/00/309-2022/07	HQ/12/ASS/00/309																				
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<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>The effectiveness of the Health and Safety in the certification unit is monitored and ensured through recording of various checklists and trainings by the management teams of the operating units. Based on site visits of the sampled operations and workstations at the mill and estates, it showed that generally the control measures as per HIRARC and SOPs were satisfactorily implemented.</p>	<p>Non-compliance</p>																				

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		<p>Nonetheless, the monitoring of effectiveness of the H&S plan to address health and safety risks to people was not satisfactorily demonstrated. At GSGE, there is a store built close to the labour quarters for the purpose of keeping petrol for the consumption of motorised cutter and mist-blower. However, the following lapses were noticed:</p> <ul style="list-style-type: none"> • The entrance door was not locked, hence easy accessibility • No hazard signage • Three out of five 20 lt-jerry cans containing petrol had no labels • Although there were trays put underneath the jerry cans as secondary containments, the floor of the store was still in a soil ground form. <p>This is not in-line with the established guideline. Thus, a non-conformity report was assigned.</p>					
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.							
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The sampled operating units have established their annual training programmes for year 2022 and 2023 that covers all aspects of the RSPO Principles and Criteria including gender-specific needs. Generally, the training programmes include best practices, OHS, environment, and sustainability.</p>	Complied				
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Training records were well maintained by the sampled operating units and made available for verification. Among the information available in the records was title of training, date conducted, name of trainer(s), name of participants, and signature of participants. Below are among the records sampled:</p> <p>GKBE:</p> <table border="1" data-bbox="1028 1353 1919 1399"> <thead> <tr> <th data-bbox="1028 1353 1711 1399">Trainings</th> <th data-bbox="1711 1353 1919 1399">Date</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Trainings	Date			Complied
Trainings	Date						

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		Company's policies	04/10/2022	
		RSPO, MSPO & ISCC requirements	08/11/2022	
		Sustainability Management Procedure Manual	08/11/2022	
		Training to contractors on sustainability	09/11/2022	
		Environmental responsibility	09/11/2022	
		Riparian buffer zone management	09/11/2022	
		Chemical spraying	25/07/2022	
		Fertilisers application	13/10/2022	
		IPM	15/03/2022	
		Tractor driving	18/10/2022	
		GAIOM:		
		Trainings	Date	
		Chemical handling and spillage management	02/03/2022	
		Domestic and recyclable wastes management	03/03/2022	
		Working at height	08/04/2022	
		Environmental report and monitoring	19/04/2022	
		Dark smoke control and monitoring	19/04/2022	
		Process troubleshooting – high kernel losses	09/05/2022	
		Hearing conservation	23/10/2022	
		Customer complaint & feedback	22/12/2022	

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		SOP – rotating machines	25/03/2022	
		Briefing on complaints and workers committee	27/07/2022	
		GSGE:		
		Trainings		Date
		Fire drill		29/12/2022
		New workers induction		14/12/2022
		Briefing on SOP and OHS		12/12/2022
		Harvesting standard		03/11/2022
		Safety at workshop		11/10/2022
		Welding safety		11/10/2022
		RSPO briefing for replanting contractor		25/07/2022
		Scheduled wastes handling and disposal		27/06/2022
		PPE, spraying and trunk injection		08/04/2022
		IPM		10/03/2022
		GTME:		
		Trainings		Date
		Company’s policies		02/12/2022
		RSPO, MSPO & ISCC requirements		09/09/2022
		Environmental responsibility		22/04/2022

		Riparian buffer zone management	22/04/2022	
		SOP – harvesting, manuring, spraying & chemical handling	06/09/2022	
		SOP – tractor and lorry drivers	05/09/2022	
		Emergency response plan	15/09/2022	
		FFB evacuation	04/07/2022	
		Relabelling of chemical containers	09/09/2022	
		First aid and CPR	26/03/2022	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor Compliance -	The last training on supply chain was conducted on 11/11/2022, which also covering the supply chain topics of other schemes such as MSPO and ISCC. It was attended by 5 participants which includes admin clerks, weighbridge operators, and executives. It was conducted by the Sr Manager of Sustainability. Records of training was made available for verification.		Complied
Criterion 3.8: Supply chain requirement for mills				
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	The mill has only received all the certified FFB from its certified estates which belong to Genting Plantations Berhad. Sustainability Management Procedure Manual Title: Supply Chain and Traceability (Palm Oil Mill); Doc. # SMP-GPB-23; Rev. 14; Issue date: June 2022 was available for verification. It was developed to implement the IP supply chain system at the POM. The procedure has covered the incoming FFB, outgoing CPO & PK at RSPO certified mills that operate IP supply chain system.		Complied

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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>	NA. The mill opted for IP Model.	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 mill is registered in the PalmTrace with the following details:</p> <ul style="list-style-type: none"> - License ID: CB135449 - Members Name: Genting Ayer Item Oil Mill - Members ID: RSPO_PO 1000002439 - Licence valid until 25/06/2023 	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p>	<p>GPB has developed procedures to implement the elements of the applicable supply chain model as follows:</p> <ul style="list-style-type: none"> • Sustainability Management Procedure Manual Title: Supply Chain and Traceability (Palm Oil Mill); Doc. # SMP-GPB-23; Rev. 14; Issue date: June 2022. <p>Under clause 15.0 of the procedure the Mill Manager has the overall responsibility and authority over the implementation of the procedure,</p>	Complied

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	<ul style="list-style-type: none"> b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>requirements, and compliances with all the applicable RSPO Supply Chain Certification Standard.</p>	
<p>3.8.6</p>	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports. 	<p>The implementation of the RSPO SCCS internal audit is guided by the Supply Chain and Traceability (Palm Oil Mill) procedure. The last internal audit was conducted on 05-06/12/2022 by the Sustainability Sr. Manager. The audit was conducted in tandem with the RSPO P&C and MSPO OPMC schemes. Based on the audit checklist and audit report, all clauses in RSPO SCCS and RSPO Market Communications and Claims were adequately covered There was no non-conformity raised related to RSPO SC from the audit.</p>	<p>Complied</p>
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. 	<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 bases as below:</p>	<p>Complied</p>

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<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><u>Genting Sri Gading Estate</u></p> <p>a. The name and address of the seller – Genting Sri Gading Estate, Batu Pahat</p> <p>b. The delivery date – 15/11/2022</p> <p>c. The date in which the documents were issued – 15/11/2022</p> <p>d. Product – FFB</p> <p>e. The quantity of the products delivered – 13,070 kgs</p> <p>f. Any related transport documentation – Despatch Note# FFB2201099W</p> <p>g. A unique identification number – Despatch Note# FFB2201099W</p> <p><u>Genting Sungai Rayat Estate</u></p> <p>a. The name and address of the seller – Genting Sungei Rayat Estate, Batu Pahat, Johor.</p> <p>b. The delivery date – 30/12/2022</p> <p>c. The date in which the documents were issued – 30/12/2022</p> <p>d. Product – FFB</p> <p>e. The quantity of the products delivered – 14,010 kgs</p> <p>f. Any related transport documentation – Despatch Note# FFB22012479W</p> <p>g. A unique identification number – Despatch Note# FFB22012479W</p> <p>There has been no projected overproduction. Nonetheless, based on interview with the staff, the facility is aware of this requirement.</p> <p>The mechanism for handling non-conforming 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>	
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<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>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.: SGMW/CPO/2211/A01 <ul style="list-style-type: none"> a. The name and address of the buyer – XXX b. The name and address of the seller – Genting Ayer Item Oil Mill, Johor c. The loading or shipment / delivery date – 08/11/2022 d. The date on which the documents were issued – 08/11/2022 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 SG CPO g. The quantity of the products delivered – 40,790 kgs h. Any related transport documentation – Weighbridge Ticket# CPOSG22000390W i. A unique identification number(s) – Weighbridge Ticket# CPOSG22000390W 2) Contract No.: SGMWM/PK/2211/A03 & SGMWM/PK/2212/A03 <ul style="list-style-type: none"> a. The name and address of the buyer – XXX b. The name and address of the seller – Genting Ayer Item Oil Mill, Johor c. The loading or shipment / delivery date – 30/11/2022 d. The date on which the documents were issued – 30/11/2022 e. RSPO Certificate number – RSPO 653474 	<p>Complied</p>
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		<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 IP PK g. The quantity of the products delivered – 38,640 kgs h. Any related transport documentation – Weighbridge Ticket# PKIP22000258W i. A unique identification number(s) – Weighbridge Ticket# PKIP22000258W 	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 	<p>There is no 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 29/10/2021 for Makmur Transport Sdn Bhd. Requirements of RSPO, ISCC, MSPO and OSHA was stated clearly in the agreement signed by the contractors. The content of the contract depicted that GPB has the legal ownership of the product carried. The contractor shall ensure to provide 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>	Complied

	d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The mill has recorded the details of the contractors engaged by the mill in the stakeholder list last updated on 05/12/2022.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	There were no new contractors used for the physical handling of RSPO certified products by the mill.	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 requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>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.</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> <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>	Complied

	<p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>		
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<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 2022 – Dec 2022 was 20.03% (OER) & 5.16% (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>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>	Complied

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	ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	1. Contract Number: SGMWM/CPO/2211/A01; Despatch Date: 08/11/2022; PalmTrace Announcement Date: 20/11/2022. 2. Contract Number: SGMWM/PK/2211/A03; Despatch Date: 30/11/2022; PalmTrace Announcement Date: 16/12/2022.	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	GPB has stated their RSPO membership in the company's website (https://www.gentingplantations.com/) and in their annual Sustainability report. There was no use of RSPO corporate logo or trademark observed.	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	GPB has stated their RSPO membership in the company's website (https://www.gentingplantations.com/) and in their annual Sustainability report. There was no use of RSPO corporate logo or trademark observed.	Complied
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO	There was no evidence that the company has made any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied

	membership by itself implies the selling of RSPO-certified oil palm products.		
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 the mill 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.	Through verification of documents such as business card, shipping documentation, etc. and site review (notice board, billboard, entrance signage), there was no evidence of RSPO corporate logo used by the mill.	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 was 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.	When the certified CPO/PK delivered to the buyers, the supply chain model and certificate number were mainly stated in the shipping document, i.e., weighbridge ticket. Copies of this document were well kept by the mill and made available for verification.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are	The mill is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable

	<p>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>		
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 in the CPO and PK is 100% RSPO IP-certified.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	NA. The mill opted for IP model.	Not Applicable
	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.	There is no percentage of non-certified oil palm within the products as the mill accepts only RSPO certified FFB.	Complied
Labelling and trademark (IP)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack 	There was no evidence of RSPO label being used by the mill.	Complied

	communications, the RSPO trademark can be printed anywhere on the pack.		
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	There was no evidence of storytelling in product-related communications being stated by the mill in any forms.	Complied
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	(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,	Genting Plantations Berhad has established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company respect human	Complied

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	operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces. - Critical (Major) compliance -	rights and support international human rights law. They protect retaliation against human rights defenders who submit complaints in good faith. The policy was communicated to the stakeholders including contractors and third-party during stakeholders meeting latest conducted on 9/6/2022. Internally, a sample records of briefing and training dated on 10/1/2023 of Human Rights Policy, Sexual Harassment Policy and Women Rights Training on 16/12/2022 was conducted by GAIOM.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Genting Plantations Berhad ensure all personnel are treated fairly and protected from any form of discrimination that violates human rights. Interviewed with the workers and stakeholders confirmed that no harassment by the management and their rights were respected.	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Complaint and grievance procedure have been documented in the document title "Complaints and grievance" document number SMP-GPB-19 dated June 2022. Stated in the procedure that there are 3 methods to lodge any complaint which are verbally and record the complaint in the complaint and grievance book, written complaint by post, SMS, or place in the complaint and suggestion box or complaint to head office in Kuala Lumpur. State also in the procedure that any complaint receives need to be acted twithin 1 months of complaint received and after action taken, 7 days to obtain feedback on the effectiveness of the action. Genting Plantations has established Social Policy dated 14/09/2020 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.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	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	Complied

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	<p>- Minor compliance -</p>	<p>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. Besides, Careline was implemented and seen the memo of the implementation published on the entrance of the mill office, estate office, sundry shops and food shops.</p> <p>The procedure was communicated to the stakeholders including contractors and third-party during stakeholder meeting conducted on 9/6/2022 with attendance representative from contractors, sundry shops, workers representative.</p> <p>Other sessions of procedures communications in other operating units were as following:</p> <ul style="list-style-type: none"> - GSGE internal stakeholder meeting; date: 27/6/2022. - GTME external stakeholder meeting; date: 13/10/2022 - GTME internal stakeholder meeting; date: 13/9/2022 <p>As per interview during the site visit and stakeholder’s consultation, there is evidence that employees have been made aware on the complaint procedure and mechanism for complaint. Employee and stakeholders also aware timeline for respond and person in charge to handle complaint.</p>	
<p>4.2.3</p>	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>GAIOM and the estates have implemented Complaints/ Grievances Record Book to record any complaint or grievance received. There is evidence that all complaint that has been received has been responded within the timeline based on records maintained and interview conducted with sample workers during assessment.</p>	<p>Complied</p>
<p>4.2.4</p>	<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</p>	<p>Based on the Complaints and Grievances procedure with Doc. No.: SMP-GPB-19, Rev. 04 dated March 2020, under Clause 2.1.10, the complainant shall be given the option of access to independent legal and technical advice, to</p>	<p>Complied</p>

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	and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Contributions to community development that are based on the results of consultation with local communities are demonstrated as per sample records of GAIOM Summary of Contributions to Local Developments and Communities; Date: 11/1/2023 as following: - GAIOM: Donation for PIBG SMK Seri Machap; Date: 20/6/2022 - GAIOM: Contribution of 2 units Smart TV to SK Sri Maju Jaya; Date: 11/1/2023 - GAIOM: Scholarship of best student in Kg. Sri Maju Jaya; Date: 9/6/2022 - GSGE: Contribution of chicken for festive celebration; Date: 21/10/2022 - GTME: Contribution to SK Paya Mas School Sports Event; Date: 1/6/2022 - GTME: Contribution to SK Paya Mas School Podium Event Date: 11/1/2023 - GTME: Hosting of Institut Latihan Perindustrian Ledang Orientation Course; Date: 9/1/2023	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.			
4.4.1	(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. - Critical (Major) compliance -	GAIOM able to demonstrate the legal ownership if its lands through evidence of land title possession of where the mill located inside the land of Genting Sungei Rakyat Estate under the land title# 96424; Lot # 227 and Lot # 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. Tenancy period: 1/1/2022 – 30/6/2024 (30 months). All estates within GAIOM certification units possessed valid land title copies to demonstrate the legal ownership if its lands.	Complied

4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land. No customary involved in GAIOM certification unit.</p> <p>In case of dispute, the process will be handled as per developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates (Doc. No.: SMP-GPB-18, Rev. 03 dated 29/12/2017). The objective of the procedure is to provide guidelines on the handling of land issues/ boundary conflicts, including related land conflicts. FPIC negotiation and legal proceedings may be carried out interchangeably or simultaneously. Compensations procedures were outlined in the procedure.</p>	Complied
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land. No customary involved in GAIOM certification unit.</p> <p>In case of dispute, the process will be handled as per developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates (Doc. No.: SMP-GPB-18, Rev. 03 dated 29/12/2017). The objective of the procedure is to provide guidelines on the handling of land issues/ boundary conflicts, including related land conflicts. FPIC negotiation and legal proceedings may be carried out interchangeably or simultaneously. Compensations procedures were outlined in the procedure.</p>	Complied
4.4.2b	<p>Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land. No customary involved in GAIOM certification unit.</p>	Complied

		In case of dispute, the process will be handled as per developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates (Doc. No.: SMP-GPB-18, Rev. 03 dated 29/12/2017). The objective of the procedure is to provide guidelines on the handling of land issues/ boundary conflicts, including related land conflicts. FPIC negotiation and legal proceedings may be carried out interchangeably or simultaneously. Compensations procedures were outlined in the procedure.	
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 -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land. No customary involved in GAIOM certification unit. In case of dispute, the process will be handled as per developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates (Doc. No.: SMP-GPB-18, Rev. 03 dated 29/12/2017). The objective of the procedure is to provide guidelines on the handling of land issues/ boundary conflicts, including related land conflicts. FPIC negotiation and legal proceedings may be carried out interchangeably or simultaneously. Compensations procedures were outlined in the procedure.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land. No customary involved in GAIOM certification unit. In case of dispute, the process will be handled as per developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates (Doc. No.: SMP-GPB-18, Rev. 03 dated 29/12/2017). The objective of the procedure is to provide guidelines on the handling of land issues/ boundary conflicts, including related land conflicts. FPIC negotiation	Complied

		<p>and legal proceedings may be carried out interchangeably or simultaneously. Compensations procedures were outlined in the procedure.</p> <p>Each operating units documented its boundary map as per sample sighted for GAIOM as per Layout Plan of Soil Permeability Test Points at Land Irrigation Area; Drawing # VT/GAIOM/SPT/C1; Date: May 2013 by Vikmatech Engineering Sdn. Bhd.</p>	
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land. No customary involved in GAIOM certification unit.</p> <p>In case of dispute, the process will be handled as per developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates (Doc. No.: SMP-GPB-18, Rev. 03 dated 29/12/2017). The objective of the procedure is to provide guidelines on the handling of land issues/ boundary conflicts, including related land conflicts. FPIC negotiation and legal proceedings may be carried out interchangeably or simultaneously. Compensations procedures were outlined in the procedure.</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.</p> <p>- Critical (Major) compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land. No customary involved in GAIOM certification unit.</p> <p>In case of dispute, the process will be handled as per developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates (Doc. No.: SMP-GPB-18, Rev. 03 dated 29/12/2017). The objective of the procedure is to provide guidelines on the handling of land issues/ boundary conflicts, including related land conflicts. FPIC negotiation and legal proceedings may be carried out interchangeably or simultaneously. Compensations procedures were outlined in the procedure.</p>	Complied

4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land. No customary involved in GAIOM certification unit.</p> <p>In case of dispute, the process will be handled as per developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates (Doc. No.: SMP-GPB-18, Rev. 03 dated 29/12/2017). The objective of the procedure is to provide guidelines on the handling of land issues/ boundary conflicts, including related land conflicts. FPIC negotiation and legal proceedings may be carried out interchangeably or simultaneously. Compensations procedures were outlined in the procedure.</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.</p> <p>- Critical (Major) compliance -</p>	<p>No new plantings are established on the land of local peoples. Lands are leased from state government as per ownership documents verified as reported in indicator 4.4.1 above.</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>No new plantings are established on the land of local peoples. Lands are leased from state government as per ownership documents verified as reported in indicator 4.4.1 above.</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>No new plantings are established on the land of local peoples. Lands are leased from state government as per ownership documents verified as reported in indicator 4.4.1 above.</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>No new plantings are established on the land of local peoples. Lands are leased from state government as per ownership documents verified as reported in indicator 4.4.1 above.</p>	Complied
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>No new plantings are established on the land of local peoples. Lands are leased from state government as per ownership documents verified as reported in indicator 4.4.1 above.</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>No new plantings are established on the land of local peoples. Lands are leased from state government as per ownership documents verified as reported in indicator 4.4.1 above.</p>	Complied

4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new plantings are established on the land of local peoples. Lands are leased from state government as per ownership documents verified as reported in indicator 4.4.1 above.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new plantings are established on the land of local peoples. Lands are leased from state government as per ownership documents verified as reported in indicator 4.4.1 above.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	There is no new planting and no development on customary land, in which no compensation is required. However, Genting Plantations Berhad has developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates (Doc. No.: SMP-GPB-18, Rev. 03 dated 29/12/2017). The objective of the procedure is to provide guidelines on the handling of land issues/ boundary conflicts, including related land conflicts. Negotiation and legal proceedings may be carried out interchangeably or simultaneously. Compensations processes and methods were outlined in the procedure.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	Procedure as refer to indicator 4.6.1	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	NA. There are no scheme small holdings within the certification.	Not Applicable

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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>There is no new planting and no development on customary land, in which no compensation is required. In case of any, it will be handled as per procedure as stated in 4.6.1 is implemented.</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>There is no new planting, and no compensation is required. However, Genting Plantations Berhad has developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates (Doc. No.: SMP-GPB-18, Rev. 03 dated 29/12/2017). The objective of the procedure is to provide guidelines on the handling of land issues/ boundary conflicts, including related land conflicts. Negotiation and legal proceedings may be carried out interchangeably or simultaneously. Compensations procedures were outlined in the procedure.</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>Procedure as refer to indicator 4.7.1.</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 community that have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area.</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>There is no new planting and no development on customary land. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land.</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>There is no new planting and no development on customary land. No issues related to land conflict and loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land.</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>- Minor compliance -</p>	<p>There is no new planting and no development on customary land. There is no new land acquisition and all lands are state lease land. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.8.4	<p>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).</p> <p>- Minor compliance -</p>	<p>Genting Plantations Berhad has developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates (Doc. No.: SMP-GPB-18, Rev. 03 dated 29/12/2017). The objective of the procedure is to provide guidelines on the handling of land issues/ boundary conflicts, including related land conflicts. Negotiation and legal proceedings may be carried out interchangeably or simultaneously. Compensations procedures were outlined in the procedure.</p>	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.	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	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.	Complied
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	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.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - 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.	Complied

5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	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.	Complied
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	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. Nevertheless, the weighbridges are calibrated on a yearly basis to ensure accuracy. Weighbridge calibration certificates were available for verification as below. 1. <u>Weighbridge No. 1</u> Certificate Number: 054640; Serial Number: B521963089; Safety Sticker Number: DE18 005059; Description: 60,000 Kg x 10 Kg; Date: 08/06/2022. 2. <u>Weighbridge No. 2</u> Certificate Number: 056300; Serial Number: C046504178; Safety Sticker Number: DE18 006537; Description: 80,000 Kg; Date: 28/07/2022.	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	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.	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - 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.	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			

5.2.1	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.	Complied
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.	Complied
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.	Complied
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.	Complied
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.	Complied
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent	Genting Plantations Berhad has established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company shall not	Complied

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	<p>discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.</p> <p>Communication of the procedure to internal and external stakeholders conducted during stakeholders' consultation meeting as per sample as following:</p> <ul style="list-style-type: none"> - GAIOM and estates external stakeholders meeting on 9/6/2022. - GSGE internal stakeholder meeting on 27/6/2022. - GTME external stakeholder meeting date: 13/10/2022 - GTME internal stakeholder meeting date: 13/9/2022 	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Interview conducted with the sample workers from different gender and nationalities confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers and job offered based on capability. The worker can request for job transfer if they found they are unfit for the job assigned to them. Effective on November 2022 onwards, the company implemented its Foreign Workers Ethical Responsible Recruitment Procedures; Doc. # GEN-13; Rev. 06; Issue date: 3/10/2022 which include the procedure of zero recruitment fees for the recruitment of foreign workers.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>As per the Procedure for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021), the recruitment and promotion were based on merit and skills. Interview conducted with the sample workers from different gender and nationalities confirmed that no discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. Reviewed the personal files of the workers found that they have been provided with on job trainings. The records of training were filled in the Individual Training Record form.</p>	Complied

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6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>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 and the HR from HQ confirmed that pregnancy testing is not a criterion for pre-employment. Furthermore, interview conducted with the sample workers among women confirmed that no dismissal of pregnant women workers.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>As stated in the internal procedure document number -GPB-32 issuance dated April 2021. Estates/mills shall ensure a gender committee is available at each estate/POM and representative need to be elected and appointment letter need to be available for each representative.</p> <p>Latest GAIOM gender committee meeting date: 16/12/2022 as per Minutes of Meeting for GAIOM Women and Children Committee. GSGE latest gender committee meeting date: 13/12/2022. Among the activities organised by the committee to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women were awareness talk/training about sexual harassment & domestic violence, informing the channel of forwarding complaints & grievance should there be any discrimination occurred, and organizing various gathering activities.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>There was evidence of equal pay for the same work scope based on records of work agreements and pay documents verified for sample male (M) and female (F) workers as following:</p> <p>GKBE:</p> <ul style="list-style-type: none"> - Employee ID # 02999; M; Weeder; Date joined: 23/11/2013 - Employee ID # 03301; M; Harvester; Date joined: 26/8/2015 - Employee ID # 02880; M; Tractor Driver; Date joined: 22/8/2011 - Employee ID # 03202; M; Field Worker; Date joined: 22/2/2019 - Employee ID # 03265; F; General Worker; Date joined: 1/10/2020 	Complied

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		<ul style="list-style-type: none"> - Employee ID # 03120; M; Field Worker; Date joined: 31/7/2017 - Employee ID # 03017; M; Weeder; Date joined: 2/7/2014 - Employee ID # 03095; M; Samroni; Date joined: 14/3/2012 - Employee ID # 03074; M; Field Worker; Date joined: 7/10/2022 <p>GAIOM:</p> <ul style="list-style-type: none"> - Employee ID # xx72; F; Cleaner; Date joined: 1/3/2007 - Employee ID # xx74; F; WB Operator; Date joined: 17/8/2020 - Employee ID # xx73; M; Maintenance; Date joined: 5/9/2022 - Employee ID # xx58; F; Lab Sampler; Date joined: 7/11/2022 - Employee ID # xx13; M; Process Worker; Date joined: 1/2/2014 - Employee ID # xx71; M; Maintenance; Date joined: 29/5/2015 - Employee ID # xx59; M; Process Worker; Date joined: 29/4/2016 - Employee ID # xx79; M; Process Worker; Date joined: 18/7/2017 <p>GSGE:</p> <ul style="list-style-type: none"> - Employee ID # 2401; F; General Worker; Date joined: 1/3/1990 - Employee ID # 2561; F; Field Worker; Date joined: 6/11/2020 - Employee ID # 3995; M; Tractor Driver; Date joined: 24/8/2022 - Employee ID # xx10; M; Harvester; Date joined: 1/2/2012 - Employee ID # xx06; M; Harvester; Date joined: 17/3/2018 - Employee ID # xx08; M; Harvester; Date joined: 27/4/2021 - Employee ID # xx79; M; Field Worker; Date joined: 28/5/2015 - Employee ID # xx38; M; Field Worker; Date joined: 6/1/2018 - Employee ID # xx61; M; Field Worker; Date joined: 24/1/2020 	
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		<p>GTME:</p> <ul style="list-style-type: none"> - Employee ID # xx70; F; Watchman; Date joined: 1/4/2020 - Employee ID # xx33; M; Harvester; Date joined: 3/7/2015 - Employee ID # xx56; M; Harvester; Date joined: 6/1/2018 - Employee ID # xx52; M; Harvester; Date joined: 22/8/2022 - Employee ID # xx94; F; Field Worker; Date joined: 28/9/2021 - Employee ID # xx12; F; Field Worker; Date joined: 2/4/2001 - Employee ID # xx28; M; Field Worker; Date joined: 26/5/2015 - Employee ID # xx84; F; Field Worker; Date joined: 16/9/2007 - Employee ID # xx95; M; Field Worker; Date joined: 1/2/2020 <p>GTBE:</p> <ul style="list-style-type: none"> - Employee ID # 2596; F; General Worker; Date joined: 1/1/1994 - Employee ID # 3774; M; Weeder; Date joined: 1/2/2020 - Employee ID # 3668; M; Field Worker; Date joined: 12/10/2019 - Employee ID # 3629; M; Harvester; Date joined: 14/11/2014 - Employee ID # 5386; F; General Worker; Date joined: 22/11/2022 - Employee ID # 3759; M; Tractor Driver; Date joined: 26/12/2010 - Employee ID # 3909; M; Weeder; Date joined: 23/8/2022 - Employee ID # 3625; M; Weeder; Date joined: 25/2/2019 - Employee ID # 3758; M; Harvester; Date joined: 14/10/2019 	
<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>			

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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>There were employment contracts for staffs and workers. Pay and conditions are documented and achieved the Minimum Wage Order 2022. Sample of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Employment Act 1955 which have been signed by the worker. Records of pay documents including payslips, checkroll and Socso 8A form verified for month of February 2022, August 2022 and December 2022 for sample workers as in indicator 6.1.6 above.</p>	Complied
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Sample of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Employment Act 1955 which have been signed by the worker. Records of pay documents including payslips, checkroll and Socso 8A form verified for month of February 2022, August 2022 and December 2022 for sample workers as in indicator 6.1.6 above give accurate information on compensation for all work performed.</p>	Complied
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Sample of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Employment Act 1955 which have been signed by the worker. Records of pay documents including payslips, checkroll and Socso 8A form verified for month of February 2022, August 2022 and December 2022 for sample workers as in indicator 6.1.6 above give the 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>	Complied
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions</p>	<p>The estate management has provided free housing facilities to all the workers. Basic amenities such as water and electricity were provided to the workers. Linesite inspection was carried out on monthly basis by Healthcare Assistant (HA) and twice a month by VMO as per sample for GKBE appointed Othman Mohd. Nor, Hospital Assistant as Person In-Charge of Accommodation, Safety and Amenities for Workers Housing as per letter</p>	Complied

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	<p>of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>dated 1/2/2023. Inspection conducted weekly as per records of Line Site Check List Genting Kulai Besar Estate (GKBE) which include the inspected area as following:</p> <ul style="list-style-type: none"> - Cleanliness - Drainage - Rubbish Collection - Bathroom/Septic Tank <p>GKBE latest inspection was conducted on 18/2/2023, GAIOM on 13/2/2023 GTME latest VMO visit was conducted on 17/2/2023 by Dr. Mahendran of Klinik Asia, Tangkak.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Sundry shops are available at the housing area. Workers have access to foods and daily need items easily. Interviewed with the workers confirmed that the prices are reasonable and comparable with the prices at town areas. Pricing monitoring was carried out by the management. During the visit to the shops, it was observed prices are displayed.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE 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</p>	<p>For estates as per assessment of prevailing wages and in-kind benefits provided to workers for period from January to December 2022 based on Genting Sungei Rayat Estate (GSRE)'s workers dated on 23/1/2023 as following:</p> <ul style="list-style-type: none"> - Average take home pay per piece rated harvesters: RM 2,691.38 - Highest earned wage by harvester (average 12 months): RM 3,214.35 - Minimum earned wage by general workers (daily rated): RM 1,735.71 <p>For mill as per assessment of prevailing wages and in-kind benefits provided to workers for period from January to December 2022 based on Genting Ayer Item Oil Mill (GAIOM)'s workers dated on 15/2/2023 as following:</p> <ul style="list-style-type: none"> - Average take home pay per piece rated harvesters: RM 2,685.00 	Complied

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<p>RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment 	<ul style="list-style-type: none"> - Highest earned wage by harvester (average 12 months): RM 4,665.00 - Minimum earned wage by general workers (daily rated): RM 1,591.00 	
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	<ul style="list-style-type: none"> The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>All core works are performed by permanent and full-time employees in GAIOM and its supply estates. No evidence that temporary/casual workers were employed. The estates have appointed contractor for FFB transporting and the workers of contractors are working permanently in for the contractors.</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>The management of Genting Plantation Berhad has established internal policy for good social practice and has been documented in the document title "social policy" that has been signed by chief executive officer dated 14/09/2020. Mentioned in the policy that the management is committed to ensure all workers are treated fairly, equally and with respect according to local, national and ratified international laws. Mentioned also that the management will respect human rights and support international human. Stated also that workers will able to join or form legal trade union of their own choosing and to bargain collectively.</p> <p>Based on the interview with the workers, the workers agreed that there is no prohibition to join any union and most of them have registered to NUPW as members.</p> <p>The policy was communicated from time to time to workers during daily morning muster and to external stakeholders including contractors and third-party latest during stakeholder meeting conducted on 9/6/2022.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are</p>	<p>Minutes of meeting between management and workers representatives available as per sample verified as following:</p>	Complied

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	documented in national languages (English and/or Bahasa Malaysia) and made available upon request. - Minor compliance -	- GKBE NUPW Meeting with Workers date: 17/1/2023 - GAIOM workers employee voting date: 8/8/2022 - GAIOM NUPW Kluang Branch Meeting date: 14/2/2023 - GTME Workers Committee 2 nd Meeting date: 15/12/2022	
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	Interview conducted with sample workers and workers' representatives confirmed that they are freely elected as representatives among GAIOM and all supply estates workers and members of National Union of Plantation Workers (NUPW) through voting. There were also photographic records of voting process copied to management by representatives.	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	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 is respected. The contractors have signed on the Addendum on RSPO, MSPO, ISCC & OSHA 1994 where there is specific clause under Clause 4 where the contractors shall ensure no minors (below 18 years old) are employed.	Complied
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -	As per Procedures for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021), Clause 6.8.4, the estate and mill shall verify identification card, passport and work permit before employ workers to ensure no child labour in the company. The contractor shall also provide full details of the workers such as identification card, passport, work permit for age verification by the management. Consultation with workers and verification of the workers master list with detail particulars confirmed that no child labour employed in GSLE.	Complied
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Employee Master Listing and through consultation with the stakeholders confirmed that no young persons employed within certification unit.	Complied

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6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>GAIOM and its supply estates adopted Genting Plantations Berhad's established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where the company shall not use any child labour.</p> <p>The policy was displayed at the notice board outside the office. The contractors have signed on the contract agreement where under Clause 2.5 D (i), the contractor shall ensure no minors (below 18 years old) are employed.</p> <p>Briefing of the policy was conducted on 9/6/2022 during stakeholder meeting. Consultation with the contractor confirmed that no child labour was employed.</p>	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>GSLE adopted Genting Plantations Berhad's established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited. Reproductive rights are protected.</p> <p>Besides, Sexual Harassment Policy was developed on 03/08/2009 to strive for a harassment-free environment and avoid behaviour that may create an atmosphere of hostility and intimidation of any kind at workplace. Briefing of the policy was conducted to the workers during morning muster. Procedure on Prevention and Eradication of Sexual Harassment at the Workplace was established (Doc. No.: SMP-GPB-20, Rev. 0 dated 11/10/2013). Process of handling sexual harassment complaint was outlined in the procedure.</p> <p>Latest training on Prevention of Sexual Harassment at Workplace was conducted on 9/6/2022 with reference to Procedure on Prevention and Eradication of Sexual Harassment at the Workplace; Doc. # SMP-GPB-20; Rev. # 0; Issue date: 11/10/2013.</p>	Complied

6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>GAIOM certification units adopted Genting Plantations Berhad’s established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where reproductive rights of all especially, women are protected.</p> <p>Latest communication of the policy was conducted to the workers during morning muster latest on 16/01/2023.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Management conducted new mothers’ assessment on 1/1/2023 with 2 new mothers identified in GAIOM. The assessment found that both new mothers’ needs were fulfilled accordingly by the mill. Their needs including time off to send babies to clinic to periodical check-up, private breast pumping area within work area in mill and facilities to store pumped milk.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>GAIOM certification units adopted Genting Plantations Berhad’s established Procedure on Prevention and Eradication of Sexual Harassment at the Workplace (Doc. No.: SMP-GPB-20, Rev. 0 dated 11/10/2013) to the grievance mechanism was established. Furthermore, there is a Whistle-Blower policy dated 01/06/2020 which respects anonymity and protects complainants where requested. A Grievance/ Complaint Form for Sexual Harassment was developed to record if there is any complaint. Interview conducted with the female workers confirmed that they are aware of the grievance mechanism and no issue reported.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime 	<p>Visit and interview conducted on site with workers mainly among foreigners confirmed that no retention of identity documents except for administration purposes including legalisation and renewal processes mainly work permits for foreign workers. The foreign workers were allocated with passport locker to keep their passport and the key was hold by themselves.</p> <p>Based on the Foreign Workers Recruitment Procedures, self-declaration from the recruitment agent needs to be filled in to ensure no recruitment fee paid by the workers. All the agreed recruitment fee will be paid by the company and list of recruitment cost was stated in Appendix III of the procedure.</p>	Complied

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	<ul style="list-style-type: none"> • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Employment contract was signed by the workers as sampled and the worker is allowed to terminate the contract with the serve of notice period. Interview conducted with the workers confirmed that their overtime is on voluntarily basis. They were paid with the overtime rate as per Employment Act 1955. Employment records and interview with workers confirmed that no contract substitution occurred among them.</p> <p>For contractors, they have signed on Addendum on RSPO, MSPO, ISCC & OSHA 1994, under Clause 4 where the contractor shall not practice any kind of discrimination or forced labour.</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>GAIOM certification units implemented Social Policy dated 14/09/2020 and People Policy dated 03/08/2009. Besides, Procedures for Social Management (Doc. No.: SMPGPB-32, Rev. 01 dated April 2021) was developed and implemented where the migrant workers are provided with safe living condition, post-arrival orientation on the employment condition, safety & health, sustainability and law & regulations. No discrimination, no recruitment fee and no contract substitution practiced in the company.</p>	Complied																													
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.																																
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The estates and mill management have conducted the regulated quarterly safety committee meeting with the participation of workers representative. Minutes of meetings were made available for verification which dated as follows:</p> <table border="1" data-bbox="1025 1110 1899 1385"> <thead> <tr> <th rowspan="2">OU</th> <th colspan="4">Quarter and dates</th> </tr> <tr> <th>04/2022</th> <th>03/2022</th> <th>02/2022</th> <th>01/2021</th> </tr> </thead> <tbody> <tr> <td>GKBE</td> <td>21/12</td> <td>09/09</td> <td>24/06</td> <td>26/032</td> </tr> <tr> <td>GAIOM</td> <td>29/11</td> <td>27/09</td> <td>21/07</td> <td>28/04</td> </tr> <tr> <td>GSGE</td> <td>16/12</td> <td>27/09</td> <td>21/06</td> <td>22/03</td> </tr> <tr> <td>GTME</td> <td>30/12</td> <td>17/09</td> <td>18/06</td> <td>09/03</td> </tr> </tbody> </table>	OU	Quarter and dates				04/2022	03/2022	02/2022	01/2021	GKBE	21/12	09/09	24/06	26/032	GAIOM	29/11	27/09	21/07	28/04	GSGE	16/12	27/09	21/06	22/03	GTME	30/12	17/09	18/06	09/03	Complied
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		<p>Generally, among the agenda discussed in the meetings are:</p> <ul style="list-style-type: none"> • accident statistics • PPE usage and monitoring • review of HIRARC • OSH Training Programme • Workplace inspection report • Emergency response plan • Other matters <p>Workplace inspections were made prior to the committee meeting. generally, the respective operating units' managers were the chairman of the committees.</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>GPB has established accident and emergency procedure and documented in System Procedure: Emergency Response Procedure [doc. no. SP-MGR-04 dated 1/8/2017]. Each operating unit has its own Emergency Response Team as required in the procedure. Various trainings on emergency response have been conducted by the operating units such as firefighting training by Bomba/supplier, first aid, chemical spillage, and evacuation drill to name a few. Records of training were well maintained and made available for verification. It was observed that emergency contact numbers were also displayed on notice boards at the sampled operating units. Based on field visits at various operations such as workshop, harvesting & evacuation, spraying and general works, first aid kits and first aiders were available on-site.</p>	Complied
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as 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>The management provides appropriate PPE to the employees in accordance with HIRARC and Standard Operating Procedure. PPE issuance records were well maintained and made available for verification. Among the information available in the record was name of employee, type of PPE (i.e., apron, safety shoes, rubber boots, N95 mask, respirator, cartridge, helmet, goggle, cotton gloves, nitrile gloves, etc.), date of PPE received and receipt acknowledgement by the recipient. On site verification and interview with</p>	Non-compliance

	<p>- Critical (Major) compliance -</p>	<p>workers showed that the appropriate PPE was provided for free and worn accordingly.</p> <p>However, it was found that the wearing of appropriate PPE was not implemented by some workers, where the following lapses were found:</p> <ol style="list-style-type: none"> 1) In the HIRARC document, there is only one term used for feet protection i.e., "Safety Shoes" which can be the metal covered shoes or Wellington boots. It was observed that some tractor drivers were wearing metal covered shoes while some were wearing Wellington boots. This indicates the term used is unclear. 2) During the site tour, some workers did not wear the appropriate PPE during performing their works according to the company's HIRARC and/or SOP such as the following: <ol style="list-style-type: none"> i) GKBE: Grabber tractor driver was wearing Wellington boots instead of safety shoes. ii) GKBE: workshop foreman was wearing regular shoes instead of safety shoes without any reason iii) GTME: A harvester did not wear safety goggles while working iv) GTME: based on demonstration of putting on canvas to cover the FFB in the trailer, done by a contract FFB truck driver (reg. no. JQY 1185), it was noted that he was having difficulty in wearing the safety harness and seemed to be unsure about where to attach it. v) GTBE: based on information given by the AM, the contract FFB transport drivers at the Chempedak Div. temporary collection centre who are assigned to deliver the FFB to GAIOM, on regular basis the drivers have climbed on top of the FFB which are filled in the bin in order to arrange the FFB and cover them with canvas, without using any safety harness, before leaving to GAIOM. This is not in-line with the required control measures spelt out in the HIRARC. <p>Thus, a non-conformity report was assigned.</p>	
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		Sanitation facilities such as shower room, PPE washing area, personal clothing locker for those applying pesticides are available, so that workers can change out of PPE, wash, and put on their personal clothing were provided and well maintained.																		
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>Should there be any medical care needed by the employees, clinics with certified Medical or Hospital Assistants in-charge were provided at all the sampled management units. Based on site visits, all the clinics were well maintained and managed. Records of medical inventory, VMO visits and patients treated were made available for verification.</p> <p>The sampled operating units are subscribing to SOCSO to cover the accident insurance for all their workers. Latest monthly contributions were verified and confirmed with the following details:</p> <table border="1"> <thead> <tr> <th>OU</th> <th>Transaction date</th> <th>Payment voucher Ref. No.</th> <th>No. of employees covered</th> </tr> </thead> <tbody> <tr> <td>GKBE</td> <td rowspan="4">Feb 2023</td> <td>ACR022230434840-01/2023</td> <td>146</td> </tr> <tr> <td>GAIOM</td> <td>SOC1000000501710</td> <td>77</td> </tr> <tr> <td>GSGE</td> <td>ACR022230435024-01-2023</td> <td>160</td> </tr> <tr> <td>GTME</td> <td>SOC10000005017717</td> <td>177</td> </tr> </tbody> </table>	OU	Transaction date	Payment voucher Ref. No.	No. of employees covered	GKBE	Feb 2023	ACR022230434840-01/2023	146	GAIOM	SOC1000000501710	77	GSGE	ACR022230435024-01-2023	160	GTME	SOC10000005017717	177	Complied
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6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	Records on Lost Time Accident (LTA) metrics at the sampled operating units were available for verification. JKPP 8 was submitted to DOSH annually. The RSPO’s Lost Time Injury Frequency Rate (LTIFR) metrics was also used to record the number of lost time injuries and total hours worked for the period of Jan – Dec of 2022. Verification against the certification unit’s records such as JKPP 8 found the data to be accurate.	Complied																	

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

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

<p>7.1.1</p>	<p>(C) IPM plans are implemented and monitored to ensure effective pest control. - 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> <p><u>Genting Kulai Besar Estate</u></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 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><u>Genting Sri Gading Estate</u></p> <p>IPM Management Plan established on 18/01/2023.</p> <ol style="list-style-type: none"> 1. Biological Control – Increase barn owl box ratio but according to policy. 2. Chemical Control – Maintaining Barn Owl population <ol style="list-style-type: none"> a. Implement 1st generation bait – Racumin, Butik S b. Stop completely usage of 3rd generation bait – Storm etc. 3. Biological Control – To set up beneficial plant planting coverage and planted with different type of species. 4. Mechanical Control <ol style="list-style-type: none"> a. Grass cutting using rotor slasher. b. Use of mechanical ripper (rastros) in immune area to expose breeding ground of rhinosorous beetles (RB). 5. Global Invasive Species – Global invasive species are not introduced at estates. <p><u>Genting Tanah Merah Estate</u></p>	<p>Complied</p>
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		<ol style="list-style-type: none"> 1. Barn Owl – Current boxes are adequate. 2. Beneficial Plant – Maintain and replanting of the dead beneficial plant. 3. Grass cutting & Rotorslasher – to promote beneficial pest in immature and newly mature area. <p><u>Genting Tebong Estate</u></p> <ol style="list-style-type: none"> 1. Increase barn owl box ration 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 b. Stop completely usage of 3rd generation bait – Storm etc 3. Increase planting area for beneficial plant 4. Grass cutting & Rotorslasher – to promote beneficial pest in immature and newly mature area. 	
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>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>The justification of all pesticides used in the estate were documented in Sustainability Management procedure Manual under section SOPs and</p>	Complied

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	- Critical (Major) compliance -	Justification of Pesticides Used. Refer document no. SMP-GPB-28, rev 4 dated 03/07/2018. The SOP addressed on: 1. Procedures on pesticides usage 2. Type of pesticides 3. Justification of all pesticides used a. Crop stage b. Application Type c. Pesticide Name d. Active Ingredient e. Class (by Pesticide Malaysia) f. WHO class g. Target Weed/Pest	
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - Critical (Major) compliance -	Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the sampled estates. Based on the records, the total a.i. per ha for 2022 was less than 1 kg a.i./ha for both matured and immature areas.	Complied
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sustainability Management procedure Manual under section SOPs and Justification of Pesticides Used. Refer document no. SMP-GPB-28, rev 4 dated 03/07/2018. The implementation in the field is consistent with the SOP established.	Complied
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	No prophylactic use of pesticide was identified in the estates.	Complied

7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>Based on the sampled estates' Chemical Register using OSHA regulated format, there were only class II, III & IV chemicals used by the estates. There were no pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, used. Control of leaf-eating pest such as bagworms was done using Class IV Acephate.</p>	Complied
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Trainings on safe handling of chemical and right method of spraying were given to the relevant employees which include the storekeeper, pre-mixers, and herbicides sprayers. This is also in-line with the recommendation by the CHRA assessor. Various methods of training such as briefing, practical training and on-the-job supervisions were used to ensure effective delivery of knowledge. Records of training were well maintained for verification at all the sampled estates.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in all estates' Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. Hazard signage and signage requiring the wearing of PPE were visibly displayed. The stores were also equipped</p>	Complied

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		with ventilation fans and up-to-date chemical register, trade and generic names, and their Safety Data Sheets were available.	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	Excess chemical containers that were not used for containing premixed chemicals have been triple rinsed and punctured was safely stored to prevent misuse. The containers will then be collected by any authorised vendors and records of disposal were maintained.	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	Aerial of pesticides was not practiced by any of the sampled estates.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	Although annual medical surveillance for pesticide operators is not compulsory based on the latest CHRA reports of each sampled estate, the estates still made an initiative to carry out the annual surveillance for their workers. Surveillance reports by the authorised Occupational Health Doctors were kept by the estates for reference and follow up the necessary actions. Nonetheless, at GSGE, referring to the last medical surveillance for all the workers exposed to organophosphate which was last conducted on 19/10/2022, two of the workers (passport no.: EGxxx6385 and Vxxx4123) were diagnosed to have restrictive lung disorder and requested by the Occupational Health Doctor (OHD) to repeat a spirometry test on 17/11/2022. However, there was no evidence that shows those workers have been sent for the test. Thus, a non-conformity was assigned due to this lapse.	Non-compliance
7.2.11	(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.	Based on site observation and verification of employee master list, there is no evidence that work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions.	Complied

	- Critical (Major) compliance -		
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>The Waste Management Plan (for Estates and Mills) has been established by Genting Ayer Item Certification Unit. The document states the monitoring and Action plan of managing all waste generated in the mill and estate, including methods of disposal and its legal requirements associated to the type of waste.</p> <p>Waste was classified into Scheduled Waste, Domestic Waste and Recyclable Waste. Scheduled Waste were disposed via licensed SW Contractors under DOE after being stored at the units SW store respectively. Scheduled Waste from line site is also identified and segregated to ensure they are not disposed as domestic waste. The certification units have places recyclable containers (plastic, paper and glass) around the housing compounds with regular awareness being conducted for the workers to promote recycling.</p>	Complied
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Genting Plantations Berhad have established procedures for proper disposal of generated waste materials which was available in Sustainability Management Procedure Manual; Scheduled Waste Management; SMP-GPB-11, Rev. 02, dated 11/08/2020, Sustainability Management Procedure Manual; Landfill and Domestic Waste Management Plan; SMP-GPB-12, Rev. 01, dated 01/12/2014 and Sustainability Management Procedure Manual; Recyclable Waste Management; SMP-GPB-13, Rev. 00, dated 16/03/2020.</p> <p>Based on interview and site verification, it was noted that the proper disposal of wastes was understood by the workers and management. Scheduled Waste was disposed via licensed waste manager and records of disposal was available for verification as below:</p> <p><u>Genting Ayer Item Oil Mill</u></p> <ol style="list-style-type: none"> Scheduled Waste were identified and stored in the mill’s scheduled waste store in accordance with SW Regulations 2005. The waste is stored less 	Non-compliance

		<p>than 180 days and disposed via licensed contractors. Consignment notes of latest disposed SW were verified as below:</p> <ol style="list-style-type: none"> a. SW409 – Contaminated Chemical Container; Consignment Note Number: 2023013114EYU4F; Date: 31/01/2023; Quantity: 0.1367; Facility: Southern Strength (M) Sdn Bhd. b. SW305 – Spent Engine Oil; Consignment Note Number: 2023013114VL4IQ; Date: 31/01/2023; Quantity: 0.5706; Facility: Southern Strength (M) Sdn Bhd. c. SW322 – Waste of Water Chemical Testing; Consignment Note Number: 2023013114U3QB4N; Date: 31/01/2023; Quantity: 0.0828; Facility: Southern Strength (M) Sdn Bhd. d. SW410 – Contaminated Cotton rag, Plastic & Filter; Consignment Note Number: 2023013114S1NHIR; Date: 31/01/2023; Quantity: 0.1197; Facility: Southern Strength (M) Sdn Bhd. <p>2. Domestic wastes were disposed via 3rd party contractor, Foo Chen Enterprise where the contractor has placed 2 units on bins at the housing complex. The domestic and household waste is filled into the bin and the contractor removes the bins twice a week to be disposed to the government waste disposal centres. The delivery order of the contractor as available and verified dated 02/01/2023 (D.O Number: G0017) and 05/01/2023 (D.O Number: G0018).</p> <p><u>Genting Kulai Besar Estate</u></p> <ol style="list-style-type: none"> 1. Scheduled Waste were identified and stored in the estates’ scheduled waste store in accordance with SW Regulations 2005. The waste is stored less than 180 days and disposed via licensed contractors. Consignment notes of latest disposed SW were verified as below: 	
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		<p>a. SW410 – Contaminated PPE; Consignment Note Number: 20230208182BSETM; Date: 08/02/2023; Quantity: 0.0820; Facility: Southern Strength (M) Sdn Bhd.</p> <p>b. SW410 – Contaminated Oil Filters and Rags; Consignment Note Number: 2023020818CYZ7NL; Date: 08/02/2023; Facility: Southern Strength (M) Sdn Bhd.</p> <p>c. SW306 – Spent Hydraulic Oil; Consignment Note Number: 2023020818DCY6OW; Date: 08/02/2023; Facility: Southern Strength (M) Sdn Bhd.</p> <p>d. SW110 – Electrical Waste; Consignment Note Number: 2023020818VZMAI6; Date: 08/02/2023; Facility: Southern Strength (M) Sdn Bhd.</p> <p>2. Domestic wastes were disposed via 3rd party contractor, where the contractor has placed bins at the housing complex. The domestic and household waste is filled into the bin and the contractor removes the bins twice a week to be disposed to the government waste disposal centres. Records of disposal and payments were available for verification.</p> <p><u>Genting Sri Gading Estate</u></p> <p>1. Scheduled Waste were identified and stored in the estates’ scheduled waste store in accordance with SW Regulations 2005. The waste is stored less than 180 days and disposed via licensed contractors. Consignment notes of latest disposed SW were verified as below:</p> <p>a. SW305 – Spent Lubricant Oil; Consignment Note Number: 20230201009FBAH6; Date: 08/02/2023; Quantity: 1.0970; Facility: Southern Strength (M) Sdn Bhd.</p> <p>b. SW312 – Oily Residue from Oil Traps; Consignment Note Number: 20230201009ADIWPM; Date: 08/02/2023; Quantity: 1.1870; Facility: Southern Strength (M) Sdn Bhd.</p>	
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		<p>c. SW306 – Spent Hydraulic Oil; Consignment Note Number: 20230201009PEY941; Date: 08/02/2023; Quantity: 0.2500; Facility: Southern Strength (M) Sdn Bhd.</p> <p>d. SW305 – Spent Lubricant Oil; Consignment Note Number: 202302010105FIVYG; Date: 08/02/2023; Quantity: 0.0620; Facility: Southern Strength (M) Sdn Bhd.</p> <p>2. Domestic wastes were disposed at the landfill in the estate. The landfill was visited and found to be far from the housing complex and watercourses. There was no evidence of any scheduled waste disposed via the landfill as well. The latest pit was opened on 07/02/2022.</p> <p><u>Genting Tanah Merah Estate</u></p> <p>1. Waste Management was established on 06/01/2023 and available for verification.</p> <p>2. Scheduled Waste were identified and stored in the estates’ scheduled waste store in accordance with SW Regulations 2005. The waste is stored less than 180 days and disposed via licensed contractors. Consignment notes of latest disposed SW were verified as below:</p> <p>a. SW404 – Clinical Waste; Consignment Note Number: 2022102709YCSN1W; Date: 27/10/2022; Quantity: 0.0067; Facility: Kualiti Alam Sdn Bhd.</p> <p>b. SW110 – Electronic Waste; Consignment Note Number: 20230209086ZGW5X; Date: 09/02/2023; Quantity: 0.0154; Facility: Southern Strength (M) Sdn Bhd.</p> <p>c. SW305 – Spent Lubricant Oil; Consignment Note Number: 2023020908WOZBTC; Date: 09/02/2023; Quantity: 0.0900; Facility: Southern Strength (M) Sdn Bhd.</p>	
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		<p>d. SW306 – Spent Hydraulic Oil; Consignment Note Number: 2023020908C2TMYZ; Date: 09/02/2023; Quantity: 0.2970; Facility: Southern Strength (M) Sdn Bhd.</p> <p>3. Domestic wastes were disposed at the landfill in the estate. The landfill was visited and found to be far from the housing complex and watercourses. There was no evidence of any scheduled waste disposed via the landfill as well.</p> <p><u>Genting Tebong Estate</u></p> <p>1. Getting Tebong Estate has 7 divisions which makes up the estate with 5 divisions far from each other. A Waste Management Plan has been established by the estate and adhered to by all divisions.</p> <p>2. The domestic waste is disposed via landfill at all the divisions. Visited the landfill at Home Division, Field 02A. The landfill was located far from the housing area and any watercourses. There were no evidence or recyclable waste of scheduled waste being disposed at the landfill.</p> <p>3. Scheduled Waste were identified and stored in the estates’ scheduled waste store in accordance with SW Regulations 2005. The waste is stored less than 180 days and disposed via licensed contractors. Consignment notes of latest disposed SW were verified as below:</p> <p>a. SW410 – Contaminated Oil Filter & Rags; Consignment Note Number: 2023020910U7LGJF; Date: 09/02/2023; Quantity: 0.0120; Facility: Southern Strength (M) Sdn Bhd.</p> <p>b. SW306 – Spent Hydraulic Oil; Consignment Note Number: 2023021011S8XYZV; Date: 10/02/2023; Quantity: 0.3818; Facility: Southern Strength (M) Sdn Bhd.</p> <p>c. SW408 – Contaminated Soil; Consignment Note Number: 2023021011LRKQF0; Date: 10/02/2023; Quantity: 0.0050; Facility: Southern Strength (M) Sdn Bhd.</p>	
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		<p>d. SW312 – Oil Residue from Workshop and Oil Trap; Consignment Note Number: 20230210119JCBZY; Date: 10/02/2023; Quantity: 0.0340; Facility: Southern Strength (M) Sdn Bhd.</p> <p>e. SW404 – Clinical Waste; Consignment Note Number: 202207211HQ6TO8; Date: 19/07/2022; Quantity: 0.0017; Facility: Kualiti Alam Sdn Bhd.</p> <p>Nevertheless, there were lapses in the implementation of the Waste Management Plan.</p> <p><u>Genting Ayer Item Oil Mill</u></p> <p>a. During the site visit at the mill housing complex’s domestic waste dumping bin, it was sighted that there were recyclable waste and scheduled waste that were not segregated and disposed in accordance with the waste management plans.</p> <p><u>Genting Sri Gading Estate</u></p> <p>a. During the site visit along Field 2018, it was noticed that the polybags used for seedlings during replanting were disposed all around the field. This was not in line with the document “List and Source of Pollutions – Genting Sri Gading Estate (Date: 16/01/2023) which states Source: Nursery Waste – Waste: Used Polybags – Method of Disposal: Disposed as Scheduled Waste.</p> <p><u>Genting Tebong Estate</u></p> <p>a. During the site visit at the Scheduled Waste Store, it was noticed that the required SW label sticker were not updated on its Date of Generation. This was not in accordance with Scheduled Waste Regulation 2005.</p> <p>b. During the assessment at the estate, it was verified that the SW110 – Electrical Waste were disposed via the Electrician appointed to repair electrical parts in the estate. There were no evidence of DOE License</p>	
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		approval for the electrician to transport the SW Waste out of the estate's premises.	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	Verification and interview with employees at the estate have concluded that there was no use of fire in wastes disposal. Domestic and household wastes were disposed via landfill and based on the site visit to the estate's landfill, it was observed that all domestic waste were sent to the landfill and buried.	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	Managing soil fertility to optimise yield and minimise environmental impact is addressed in OPM 7: Manuring of Oil Palm. Among the topics covered in the manual are: <ul style="list-style-type: none">- Nursery manuring- Field Manuring- Application of Fertiliser- Fertiliser delivery and Stock Reports for estates- Fertiliser sampling for analysis- Manuring Schedule- Method of application for younger and mature palms Apart from that other relevant procedures are also adhered such as: <ul style="list-style-type: none">- OPM 04: Soil conservation and terracing- SMP-GPB-14 Riparian Buffer Zone Management	Complied
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	Genting Plantation Research Centre (GPRC) prepare the annual fertilizer recommendation base leaf analysis result. Leaf analysis which is showing the nutrient status was used as a guidance to establish the recommendation. Based on the company's SOP, the soil sampling analysis is to be carried at 5 years interval. The leaf analysis and soil analysis report were made available	Complied

		for verification. All the latest reports of leaf and soil analysis were made available for verification at the sampled estates.	
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	Records of EFB application were maintained by the sampled estates and made available for verification. Among the information available in the records is field number, quantity of EFB being applied (mt) and date of application. Based on the records, it was noted that the application rate pe Ha was around 20-40 mt/ha. The application was clearly seen during the field visit especially in the immature area.	Complied
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Records of fertiliser input were well maintained in various documents such as store issuance record, bin cards and month end account to name a few. Among the information available in the records was type of fertiliser, quantity and field number applied including date of application. Based on sampled fields, the amount of fertilisers issued out (i.e. applied) from the store according to Lintramax software system was tally with the recommendations by agronomist, for all the sampled estates.	Complied
Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	Map of Genting Plantation Estate, Fragile/Marginal Soil Map was available for verification in the estate. <ol style="list-style-type: none"> 1. GKBE soil map was sourced from Department of Agriculture (DOA), dated 04/02/2019. The soil classes for the estate were Steepland (2.58 Ha/0.15%), Segamat/Katong (670.24 Ha/39.64%) and Rengam - Jerangau (1018.22 Ha/60.21%). 2. GSGE soil map was sourced from Department of Agriculture (DOA), dated 17/04/2020. The soil classes for the estate were Rengam – Jerangau (1769.80 Ha/52.07%), Sedu-Parit Botak-Linau (1362.10 Ha/40.08%), and Holyrood – Lunas (266.68 Ha/7.85%). 3. GTME soil map was sourced from Param Agriculture Soil Surveys (M) Sdn Bhd, dated July 2020. The main soil classes for the estate were Rengam 	Complied

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		<p>(68.08%), Gajah Mati (21.90%), Holyrood (14.90%) and Tawar (16.90%).</p> <p>4. GTBE has 1 home Division and 5 other divisions that make up the estate. There are 6 Soil Maps available for all land portions. All maps were available for verification. Sampled info for GTBE Home Division. The soil map was sourced from Department of Agriculture (DOA), dated 09/02/2023. The main soil classes for the estate were Rengam - Jerangau (39.31%), Rengam – Bukit Temiang (32.26%), Alluvium/Colluvium (13.81%) and Bungor/Tavy (10.85%).</p>																															
<p>7.5.2</p>	<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>Slope maps were available for Genting Plantation Estates and available for verification.</p> <ol style="list-style-type: none"> 1. GKBE – Block Boundary Updated: Feb 2020; Slope Analysis is based SRTM90; Created by: GPRC (WM); Date of Creation: 19/03/2020. 2. GSGE – Block Boundary Updated: Jan 2018; Slope Analysis is based SRTM90; Created by: GPRC (WM); Date of Creation: 10/01/2018. 3. GTME – Slope Analysis is based SRTM90; Prepared by: GPRC; Date of Creation: 17/09/2021. 4. GTMB – Slope Analysis is based SRTM90; Prepared by: GPRC; Date of Creation: 11/02/2023. (GTMB has 6 maps for its Home Division and 5 other Division). Sampled the info of the Home Division below. <table border="1" data-bbox="1025 1074 1928 1383"> <thead> <tr> <th>Terrain Classes</th> <th>GKBE</th> <th>GSGE</th> <th>GTME</th> <th>GTBE</th> </tr> </thead> <tbody> <tr> <td>Flat (0° - 2°)</td> <td>24.00 %</td> <td>42.49 %</td> <td>48.36 %</td> <td>23.90 %</td> </tr> <tr> <td>Undulating (2° - 6°)</td> <td>61.19 %</td> <td>52.36 %</td> <td>43.17 %</td> <td>65.37 %</td> </tr> <tr> <td>Rolling (6° - 12°)</td> <td>14.08 %</td> <td>4.97 %</td> <td>5.44 %</td> <td>9.57 %</td> </tr> <tr> <td>Hilly (12° - 20°)</td> <td>0.72 %</td> <td>0.09 %</td> <td>2.21 %</td> <td>1.04 %</td> </tr> <tr> <td>Steep (20° - 25°)</td> <td>0.01 %</td> <td>0.08 %</td> <td>0.51 %</td> <td>0.12 %</td> </tr> </tbody> </table>	Terrain Classes	GKBE	GSGE	GTME	GTBE	Flat (0° - 2°)	24.00 %	42.49 %	48.36 %	23.90 %	Undulating (2° - 6°)	61.19 %	52.36 %	43.17 %	65.37 %	Rolling (6° - 12°)	14.08 %	4.97 %	5.44 %	9.57 %	Hilly (12° - 20°)	0.72 %	0.09 %	2.21 %	1.04 %	Steep (20° - 25°)	0.01 %	0.08 %	0.51 %	0.12 %	<p>Complied</p>
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		Very Steep (>25°)	-	0.01 %	0.31 %	-	
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting of oil palm in Ayer Item Certification Unit Estates.					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 were done on regularly and available for verification for Ayer Item Certification Unit Estates. The operation and management followed as per recommendation by the GPRCS to sustain suitability of land for palm oil cultivation.					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 -	There were no marginal or fragile soils at the sampled estates. Peat Soil was only available at Sing Mah Division, Genting Sungei Rayat Estate which was not sampled during this assessment. Hence the compliance of the estate towards this standard shall be verified during the next assessment. GPB SMP 15 (Water Management in Inland, Coastal and Peat lands) issued on 12/11/2014 was established for best practise management of such soils.					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 maps 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 was conducted in the Certification Units since 15/11/2018 regardless of soil type.					Complied

7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	<p>Genting Plantations Berhad has reported (1st Reporting) the Peat Inventory as per RSPO Peat Inventory Genting Plantations Bhd v2 (Malaysia) with records of 338.03 ha of peat area was identified in Genting Sungei Rayat Estate, Sing Mah Division.</p>	Complied
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>Peat Soil was only available at Sing Mah Division, Genting Sungei Rayat Estate which was not sampled during this assessment. Hence the compliance towards this standard shall be verified during the next assessment.</p>	Complied
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The water and ground cover management programme is documented in the GPB SMP 15 (Water Management in Inland, Costal and Peat lands) issued on 12/11/2014. Details are described in 7.8.1. individual estate and mill had their respective water management plan mainly to monitor among others the following.</p> <ul style="list-style-type: none"> a) Bulk of the supply in view of the location are from SAJ/internal treatment for both mill and estate. b) Monitor the quality of main water inlet/outlet for pollutants from estate's operations. c) Contingency during water shortage. d) Monitor the usage of fresh water on monthly basis e) Reuse/recycle wastewater. <p>Peat Soil was only available at Sing Mah Division, Genting Sungei Rayat Estate which was not sampled during this assessment. Hence the compliance towards this standard shall be verified during the next assessment.</p>	Complied

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7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>Peat Soil was only available at Sing Mah Division, Genting Sungei Rayat Estate which was not sampled during this assessment. Hence the compliance towards this standard shall be verified during the next assessment. Nonetheless, GPB is maintaining the RSPO Drainability Assessment Procedure as the guidance in conducting the drainability assessment.</p>	Complied
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>Peat Soil was only available at Sing Mah Division, Genting Sungei Rayat Estate which was not sampled during this assessment. Hence the compliance towards this standard shall be verified during the next assessment.</p>	Complied
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>Peat Soil was only available at Sing Mah Division, Genting Sungei Rayat Estate which was not sampled during this assessment. Hence the compliance towards this standard shall be verified during the next assessment.</p>	Complied

	- Critical (Major) compliance -		
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <ul style="list-style-type: none"> a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water. <p>- Minor compliance -</p>	<p>Genting Ayer Item Certification Unit estates and mill have established its Water Management Plan. The objective of the plan is to maintain water source, ensure efficient use of water, ensure renewability of water source and avoidance of surface and ground water contamination.</p> <ul style="list-style-type: none"> a. GAIOM have established the Water Management Plan for the Mill Operations and Linesite dated 24/01/2023. GAIOM does not restrict access to clean water for all its employees. The mill provides where they treat the water obtained from underground tube well. The mill regularly treats the water to ensure the water quality is within the specifications of DWQS. The most recent water sampling was conducted on 25/11/2022 with the report (Report Number: W/2211/52150) available for verification. The results indicated that the specifications were within the World Health Organisation Guideline. b. GKBE have established the Water Management Plan dated 23/01/2023 and available for verification. GKBE does not restrict access to clean water for all its employees. All employees are provided Government Treated Water by Syarikat Air Johor (SAJ) which is provided free by the estate. c. GSGE have established the Water Management Plan dated 21/01/2023 and available for verification. GSGE does not restrict access to clean water for all its employees. All employees are provided Government Treated Water by Syarikat Air Johor (SAJ) which is provided free by the estate. d. GTME have established the Water Management Plan dated 03/02/2023 and available for verification. GTME does not restrict access to clean water for all its employees. All employees are provided Government Treated Water by Syarikat Air Johor (SAJ) which is provided free by the estate. 	Complied

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		<p>e. GTBE have established the Water Management Plan dated 12/01/2023 and available for verification. The state is divided to 7 different divisions combined to become 1 estate. All divisions do not restrict access to clean water for all its employees. All employees are provided Government Treated Water by Syarikat Air Melaka Berhad (SAMB) and Syarikat Air Negeri Sembilan (SAINS) which is provided free by the estate.</p>	
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>The protection of watercourses is guided by the procedure Genting Plantations Berhad; Sustainability Management Procedure Manual; Riparian Buffer Zone Management; Doc Number: SMO-GPB-14; revision: 02; Date: 16/03/2020. Riparian buffer zones have been established along all the rivers that flow through the estates and verified during the site visit. The management have erected signages prohibiting of works such as manuring and spraying, trespassing and encroachments as well as fishing to be done within the riparian buffers. During the visit there were no evidence of chemical or manuring works being done at the riparian reserves. Workers have been provided awareness trainings and documents of trainings were available for verification.</p> <p>Nevertheless, during the site visit at the riparian zones at GKBE, it was sighted that the riparian zone was not effectively maintained or restored. Erosion overtime has resulted in the riparian zone width being smaller. Nevertheless, there were no evidence of riparian restoration being done. Furthermore, there were evidence of chemical application done to palms located close to the riverbanks. Hence a Critical Non-Conformity was raised.</p> <p>Genting Plantations Berhad have established a Sustainability Management Procedure Manual for Water Sampling and Analysis, Document Number: SMP-GPB-15 (Issue Date: 12/11/2014) which provide guidelines on water quality sampling to ensure that proper practices are implemented at site to comply with RSPO Requirements. The estates have identified water sampling points at the river/stream inlets and outlets and conduct water sampling every 6 months. The samples are sent to accredited laboratories for sampling and</p>	Complied

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		<p>monitored accordingly. Sample of water sampling results were verified as below.</p> <ol style="list-style-type: none"> 1. Genting Ayer Item Oil Mill (GAIOM) have conducted river water quality monitoring in compliance with DOE Compliance Schedule (License Number: 003866) for Sungai Linau. The latest river water sampling was conducted on 02/01/2023 by Envilab Sdn Bhd and the results was available for verification. The results among others showed BOD at 24mg/L (Upstream) and 11mg/L (Downstream) 2. Genting Kulai Besar Estate (GKBE and GKBN Division) has 2 rivers running through the estate. There are 9 sampling points in the estate. The estate conduct water sampling to monitor impacts of the estate operations towards the rivers. Latest sampling was done on 29/12/2022 by Chemical Laboratory (Malaysia) Sdn Bhd. The results indicated that the water from GKBE and GKBN into main natural waterways in terms of the water quality are acceptable and does not create major impact to the water system. 3. Genting Sri Gading Estate has a river that flows through the estate at 2 different entry and exit points. The river water quality is monitored at both entry and exit points. The recent Water Test Report (WR01/2023) was available for verification dated 27/12/2022. The results indicated that the outgoing water quality was within the WQI Standards. 4. Genting Tanah Merah Estate has 2 rivers that flows through the estate. The river water quality is monitored at both river's entry and exit points. The recent Water Test Report (WR18/2022) was available for verification dated 01/09/2022. The results indicated that the outgoing water quality was within the WQI Standards. 5. Getting Tebong Estate has 1 Main Division and 5 other Divisions that make up the estate. There were no rivers that flow through the main division. Other divisions had river that flow through the estate and its buffer zones were classified as HCVs. The Water Management Plans have 	
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		stated for the river water quality to be monitored yearly. The records of water monitoring were available for verification.																																									
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -	<p>Mill effluent is treated in compliance with the Department of Environment (DOE); Syarat Syarat Lesen – Premis Kilang Minyak Kelapa Sawit Mentah. The mill monitors the effluent on a monthly basis and reports to DOE on a quarterly basis via the Online Environment Reporting (OER) System were available for verification.</p> <p>Effluent Analysis Report results were available for verification as below: <u>Certificate of Analysis – Final Discharge</u></p> <table border="1"> <tr> <td>Date</td> <td>11/02/2023</td> <td>09/12/2022</td> <td>09/11/2022</td> </tr> <tr> <td>Report Number</td> <td>POM11426(A-G)</td> <td>POM11253(A-G)</td> <td>POM11076(A-G)</td> </tr> <tr> <td>Sample Date</td> <td>03/01/2023</td> <td>01/12/2022</td> <td>01/11/2022</td> </tr> <tr> <td>pH Value</td> <td>9.3</td> <td>9.2</td> <td>8.5</td> </tr> <tr> <td>BOD</td> <td>52</td> <td>65</td> <td>35</td> </tr> <tr> <td>COD</td> <td>949</td> <td>1052</td> <td>1110</td> </tr> <tr> <td>SS</td> <td>166</td> <td>185</td> <td>120</td> </tr> <tr> <td>AN</td> <td>50</td> <td>35</td> <td>34</td> </tr> <tr> <td>Total N</td> <td>115</td> <td>106</td> <td>60</td> </tr> <tr> <td>Oil & Grease</td> <td>2</td> <td>2</td> <td>2</td> </tr> </table>	Date	11/02/2023	09/12/2022	09/11/2022	Report Number	POM11426(A-G)	POM11253(A-G)	POM11076(A-G)	Sample Date	03/01/2023	01/12/2022	01/11/2022	pH Value	9.3	9.2	8.5	BOD	52	65	35	COD	949	1052	1110	SS	166	185	120	AN	50	35	34	Total N	115	106	60	Oil & Grease	2	2	2	Complied
Date	11/02/2023	09/12/2022	09/11/2022																																								
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>Records of Water Usage for Jan 2017 – Jan 2023 was available for verification in the mill. The records of water usage (m³) were sampled for 2022 as below:</p> <table border="1" data-bbox="1025 443 1930 1085"> <thead> <tr> <th>Month</th> <th>Water (m³)</th> <th>Water/FFB (m³/mt)</th> </tr> </thead> <tbody> <tr><td>Jan 22</td><td>27830</td><td>1.55</td></tr> <tr><td>Feb 22</td><td>27923</td><td>1.48</td></tr> <tr><td>Mar 22</td><td>33790</td><td>1.46</td></tr> <tr><td>Apr 22</td><td>31386</td><td>1.43</td></tr> <tr><td>May 22</td><td>29282</td><td>1.32</td></tr> <tr><td>Jun 22</td><td>29321</td><td>1.35</td></tr> <tr><td>Jul 22</td><td>32168</td><td>1.42</td></tr> <tr><td>Aug 22</td><td>32757</td><td>1.41</td></tr> <tr><td>Sept 22</td><td>34842</td><td>1.52</td></tr> <tr><td>Oct 22</td><td>34606</td><td>1.61</td></tr> <tr><td>Nov 22</td><td>32235</td><td>1.71</td></tr> <tr><td>Dec 22</td><td>34352</td><td>1.48</td></tr> </tbody> </table>	Month	Water (m ³)	Water/FFB (m ³ /mt)	Jan 22	27830	1.55	Feb 22	27923	1.48	Mar 22	33790	1.46	Apr 22	31386	1.43	May 22	29282	1.32	Jun 22	29321	1.35	Jul 22	32168	1.42	Aug 22	32757	1.41	Sept 22	34842	1.52	Oct 22	34606	1.61	Nov 22	32235	1.71	Dec 22	34352	1.48	Complied
Month	Water (m ³)	Water/FFB (m ³ /mt)																																								
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Dec 22	34352	1.48																																								

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

7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>At the estates, the plan to optimise the usage of diesel is by regular maintenance of diesel-powered machinery and educational programme for the operators on fuel saving. At the mill, the utilisation of fibre and shell as biofuel for boiler operation is consistently implemented to generate electricity through turbines. This helps to reduce the dependency to fossil fuel.</p> <p>Records of Diesel Consumption for Jan 2017 – Jan 2023 was available for verification in the estate and mill. The records of diesel usage were sampled for 2022 as below:</p> <table border="1" data-bbox="1025 644 1930 1291"> <thead> <tr> <th>Month</th> <th>GAIOM</th> <th>GKBE</th> <th>GSGE</th> <th>GTME</th> <th>GTBE</th> </tr> </thead> <tbody> <tr><td>Jan 22</td><td>9095</td><td>4203</td><td>6570</td><td>1381</td><td>4393</td></tr> <tr><td>Feb 22</td><td>7544</td><td>5994</td><td>6479</td><td>1215</td><td>4112</td></tr> <tr><td>Mar 22</td><td>9524</td><td>6266</td><td>7213</td><td>1425</td><td>4426</td></tr> <tr><td>Apr 22</td><td>9042</td><td>5512</td><td>6189</td><td>1390</td><td>3882</td></tr> <tr><td>May 22</td><td>10003</td><td>4065</td><td>5868</td><td>1468</td><td>5201</td></tr> <tr><td>Jun 22</td><td>9570</td><td>5308</td><td>6152</td><td>1342</td><td>4713</td></tr> <tr><td>Jul 22</td><td>7562</td><td>7259</td><td>6133</td><td>1399</td><td>3301</td></tr> <tr><td>Aug 22</td><td>9709</td><td>6153</td><td>6514</td><td>1320</td><td>5464</td></tr> <tr><td>Sept 22</td><td>8787</td><td>6653</td><td>6231</td><td>1456</td><td>6256</td></tr> <tr><td>Oct 22</td><td>8767</td><td>6267</td><td>7395</td><td>1414</td><td>5877</td></tr> <tr><td>Nov 22</td><td>8850</td><td>6432</td><td>7478</td><td>1352</td><td>6644</td></tr> <tr><td>Dec 22</td><td>7838</td><td>7148</td><td>7542</td><td>1420</td><td>6360</td></tr> </tbody> </table>	Month	GAIOM	GKBE	GSGE	GTME	GTBE	Jan 22	9095	4203	6570	1381	4393	Feb 22	7544	5994	6479	1215	4112	Mar 22	9524	6266	7213	1425	4426	Apr 22	9042	5512	6189	1390	3882	May 22	10003	4065	5868	1468	5201	Jun 22	9570	5308	6152	1342	4713	Jul 22	7562	7259	6133	1399	3301	Aug 22	9709	6153	6514	1320	5464	Sept 22	8787	6653	6231	1456	6256	Oct 22	8767	6267	7395	1414	5877	Nov 22	8850	6432	7478	1352	6644	Dec 22	7838	7148	7542	1420	6360	Complied
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		<p>Records of Water Usage for Jan 2017 – Jan 2023 was available for verification in the estate. The records of water usage (m³) were sampled for 2022 as below:</p>					
		Month	GKBE	GSGE	GTME	GTBE	
		Jan 22	927	3966	3447	16806	
		Feb 22	523	3770	4758	279	
		Mar 22	482	3601	4248	5273	
		Apr 22	405	3493	3323	5271	
		May 22	333	3099	2234	17009	
		Jun 22	295	2800	2838	7184	
		Jul 22	248	3593	3392	6285	
		Aug 22	697	3622	3287	11253	
		Sept 22	1222	3557	3544	10908	
		Oct 22	1459	3701	3311	6396	
		Nov 22	1374	3844	4193	9822	
		Dec 22	1147	3481	4193	10102	
		<p>Records of Electricity Usage for Jan 2017 – Jan 2023 was available for verification in the estate. The records of electricity usage were sampled for 2022 as below:</p>					
		Month	GAIOM	GKBE	GSGE	GTME	GTBE
		Jan 22	53430	25392	37426	14824	31641

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		Feb 22	37710	24449	37818	13538	31933	
		Mar 22	33670	23877	33676	11289	29320	
		Apr 22	36410	25692	39118	13317	29590	
		May 22	36490	26131	40276	12403	28678	
		Jun 22	34910	25803	39327	14801	38579	
		Jul 22	39290	26578	38441	13330	25144	
		Aug 22	38520	26842	30088	15359	17674	
		Sept 22	38520	25967	39118	13559	33366	
		Oct 22	43240	27335	36453	13592	26817	
		Nov 22	40250	28545	37727	12495	22872	
		Dec 22	44730	26899	38331	13543	33437	

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

7.10.1	<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>Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO’s Palm GHG Calculator ver. 4.</p>	Complied
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</p>	<p>Not applicable since no new development by the certification unit.</p>	Not Applicable

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	<p>plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>																				
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>Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment, among the identified sources of gaseous emissions were boiler chimney, diesel engines and POME to name a few. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring for dust particulate.</p> <p>Each operating units have established Pollution Prevention Plans to reduce and prevent pollutions within the area of certification. GKBE, GSGE and GTBE have established the Pollution Prevention Plan dated 23/01/2023, 16/01/2023 and 24/01/2023 respectively, available for verification.</p> <p>GAIOM have conducted Chimney Gas Emission Monitoring in compliance to the DOE Compliance Schedule. The gas emission monitoring reports were available for verification. The monitoring was conducted by Envilab Sdn Bhd.</p> <p><u>3rd Quarter - 2022</u></p> <table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 10px;"> <tr> <td style="width: 35%;">Description</td> <td style="width: 33%;">Chimney No.4</td> <td style="width: 32%;">Chimney No.6</td> </tr> <tr> <td>Report Reference</td> <td>EIH2208(185)/GOMSB(BOI4)</td> <td>EIH2208(186)/GOMSB(BOI6)</td> </tr> <tr> <td>Monitoring Date</td> <td>26/08/2022</td> <td>25/08/2022</td> </tr> <tr> <td>Report Date</td> <td>23/09/2022</td> <td>23/09/2022</td> </tr> <tr> <td>Total Particulate (mg/m³, dry, 12% CO₂)</td> <td style="text-align: center;">51</td> <td style="text-align: center;">40</td> </tr> </table> <p><u>4th Quarter 2022</u></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 35%;">Description</td> <td style="width: 33%;">Chimney No.4</td> <td style="width: 32%;">Chimney No.6</td> </tr> </table>	Description	Chimney No.4	Chimney No.6	Report Reference	EIH2208(185)/GOMSB(BOI4)	EIH2208(186)/GOMSB(BOI6)	Monitoring Date	26/08/2022	25/08/2022	Report Date	23/09/2022	23/09/2022	Total Particulate (mg/m ³ , dry, 12% CO ₂)	51	40	Description	Chimney No.4	Chimney No.6	Complied
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		Report Reference	EIH2212(104)/ GOMSB(BOI4)	EIH2212(105)/ GOMSB(BOI6)	
		Monitoring Date	24/12/2022	23/12/2022	
		Report Date	10/01/2023	10/01/2023	
		Total Particulate (mg/m ³ , dry, 12% CO ₂)	68	50	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area					
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Based on the site visit of the replanting area at the estate, there was no evidence that fire had been used for land preparation. Oil palms were felled, chipped, and windrowed.			Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Genting Plantation Berhad; Standard Operating Procedure; Fire Prevention and Control Measures; Doc Number: SDP-PD-12 Revision: 00; Issue Date: Oct 2020 has been established and available for verification.			Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	<p>The above-mentioned fire prevention and control measures were communicated to the stakeholders via providing the procedure to the identified stakeholders. The stakeholders have acknowledged received of the document and it was available for verification.</p> <p>Among the stakeholder’s acknowledgment verified were:</p> <ul style="list-style-type: none"> a. GSGE – The estate has invited and conducted all stakeholders including adjacent stakeholders to attend the External Stakeholder Consultation 2023 at GSGE on 09/02/2023 where they have discussed on fire prevention and control measures as part of the meeting. The records of meeting were available for verification. b. GTME – The estate has invited and conducted all stakeholders including adjacent stakeholders to attend the External Stakeholder Consultation 			Complied

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		<p>2022 at GTME on 13/10/2022 where they have discussed on fire prevention and control measures as part of the meeting. The records of meeting were available for verification.</p> <p>c. GTBE – The estate has invited and conducted all stakeholders including adjacent stakeholders to attend the External Stakeholder Consultation 2022 at GTBE on 14/12/2022 where they have discussed on fire prevention and control measures as part of the meeting. The records of meeting were available for verification.</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>												
<p>7.12.1</p>	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>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 Genting Tanah Merah Estate) and Inventory on HCV sites within Genting Plantations Berhad Group of Estates and 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>	<p>Complied</p>									
<p>7.12.2</p>	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-</p>	<p>Genting Ayer Item Certification Unit have established an Inventory on HCV Sites Within Genting Plantations Berhad Group of Estate (Southern Region) – Feb 2010 and Inventory on HCV Sites Within Genting Plantations Berhad Group of Estates (Central Region) – Feb to Mar 2010.</p> <table border="1" data-bbox="1025 1246 1921 1393"> <thead> <tr> <th>Estate</th> <th>Description</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>G. Kulai Besar Estate</td> <td>Riparian Buffer Zone</td> <td>4.2</td> </tr> <tr> <td>G. Sri Gading Estate</td> <td>Riparian Buffer Zone</td> <td>4.2</td> </tr> </tbody> </table>	Estate	Description	HCV	G. Kulai Besar Estate	Riparian Buffer Zone	4.2	G. Sri Gading Estate	Riparian Buffer Zone	4.2	<p>Complied</p>
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G. Kulai Besar Estate	Riparian Buffer Zone	4.2										
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	<p>HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<table border="1"> <tr> <td></td> <td>Temple and Ancient Burial Site.</td> <td>6</td> </tr> <tr> <td>G. Sugai Rayat Estate</td> <td>Temple and Ancient Burial Site.</td> <td>6</td> </tr> <tr> <td rowspan="3">G. Tebong Estate</td> <td>Pond</td> <td>1.4</td> </tr> <tr> <td>Riparian Buffer Zone</td> <td>4.2</td> </tr> <tr> <td>Temple and Ancient Burial Site.</td> <td>6</td> </tr> <tr> <td rowspan="3">G. Tanah Merah Estate</td> <td>Ficus Tree</td> <td>1.4</td> </tr> <tr> <td>Riparian Buffer Zone</td> <td>4.2</td> </tr> <tr> <td>Temple and Ancient Burial Site.</td> <td>6</td> </tr> </table>		Temple and Ancient Burial Site.	6	G. Sugai Rayat Estate	Temple and Ancient Burial Site.	6	G. Tebong Estate	Pond	1.4	Riparian Buffer Zone	4.2	Temple and Ancient Burial Site.	6	G. Tanah Merah Estate	Ficus Tree	1.4	Riparian Buffer Zone	4.2	Temple and Ancient Burial Site.	6		
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7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not Applicable.		Not Applicable																				
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>The 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 Genting Tanah Merah Estate) and Inventory on HCV sites within Genting Plantations Berhad Group of Estates and 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> <p>The sampled estates have established and documented HCV area/Biodiversity management Plan. Generally, among the plans established were:</p> <ol style="list-style-type: none"> a. maintaining signages b. continue to record HCV monitoring such as wildlife sighting, encroachment and illegal hunting c. enhancing HCV awareness among employees. 		Complied																				

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		<p>The estates continue to train the workers on HCV and RTE Species. Signage on prohibition of illegal hunting or fishing, no swimming and chemical application at buffer zone area were erected at the HCV area. Noted during site visit, all the signage was well maintained. Verified sample awareness trainings as below:</p> <p>HCV & RTE Management Plan Training and Human – Wildlife Conflict Training conducted at GSGE on 20/12/2022.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>Not applicable since there is no land clearing after November 2005.</p>	<p>Not Applicable</p>
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The estates continue to train the workers on HCV and RTE Species. Signage on prohibition of illegal hunting or fishing, no swimming and chemical application at buffer zone area were erected at the HCV area, housing area and notice board to educate the workers. The monitoring conducted by monthly basis and the record was available in each sampling estate.</p>	<p>Complied</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>	<p>Complied</p>

7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new planting affecting present HCV and primary forest. There were no land clearing activities made nor had damaged any forest to protect or enhance the HCV.</p>	Complied
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **July 2021 – June 2022** for Genting **Ayer Item Oil Mill** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **July 2021 – June 2022** for Genting **Ayer Item Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.38
PK	1.38

Extraction	%
OER	20.21
KER	5.26

Production	t/yr
FFB Process	201,477.64
CPO Produced	40,726.594
PK Produced	10,593.429

Land Use	Ha
OP Planted Area	12,217.21
OP Planted on peat	338.03
Conservation (forested)	0
Conservation (non-forested)	157.06
Total	12,712.30

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	91,642.66	0.45	0	0	0	0	91,642.66	0.45
CO ₂ Emission from fertilizer	8,587.18	0.04	0	0	0	0	8,587.18	0.04
NO ₂ Emission	8,081.56	0.04	0	0	0	0	8,081.56	0.04
Fuel Consumption	1,663.54	0.01	0	0	0	0	1,663.54	0.01
Peat Oxidation	18,456.42	0.09	0	0	0	0	18,456.42	0.09
Sink								
Crop Sequestration	-82,017.32	-0.41	0	0	0	0	-82,017.32	-0.41
Conservation Sequestration	0		0	0	0	0	0	
Total	46,414.04	0.23	0	0	0	0	46,414.04	0.23

**Note: Includes both estates and smallholders (if any)*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	26,416.83	0.13
Fuel Consumption	1,022.28	0.01
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	-2,933.74	-0.01
Sales of EFB	0	0
Total	24,505.37	0.13

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

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

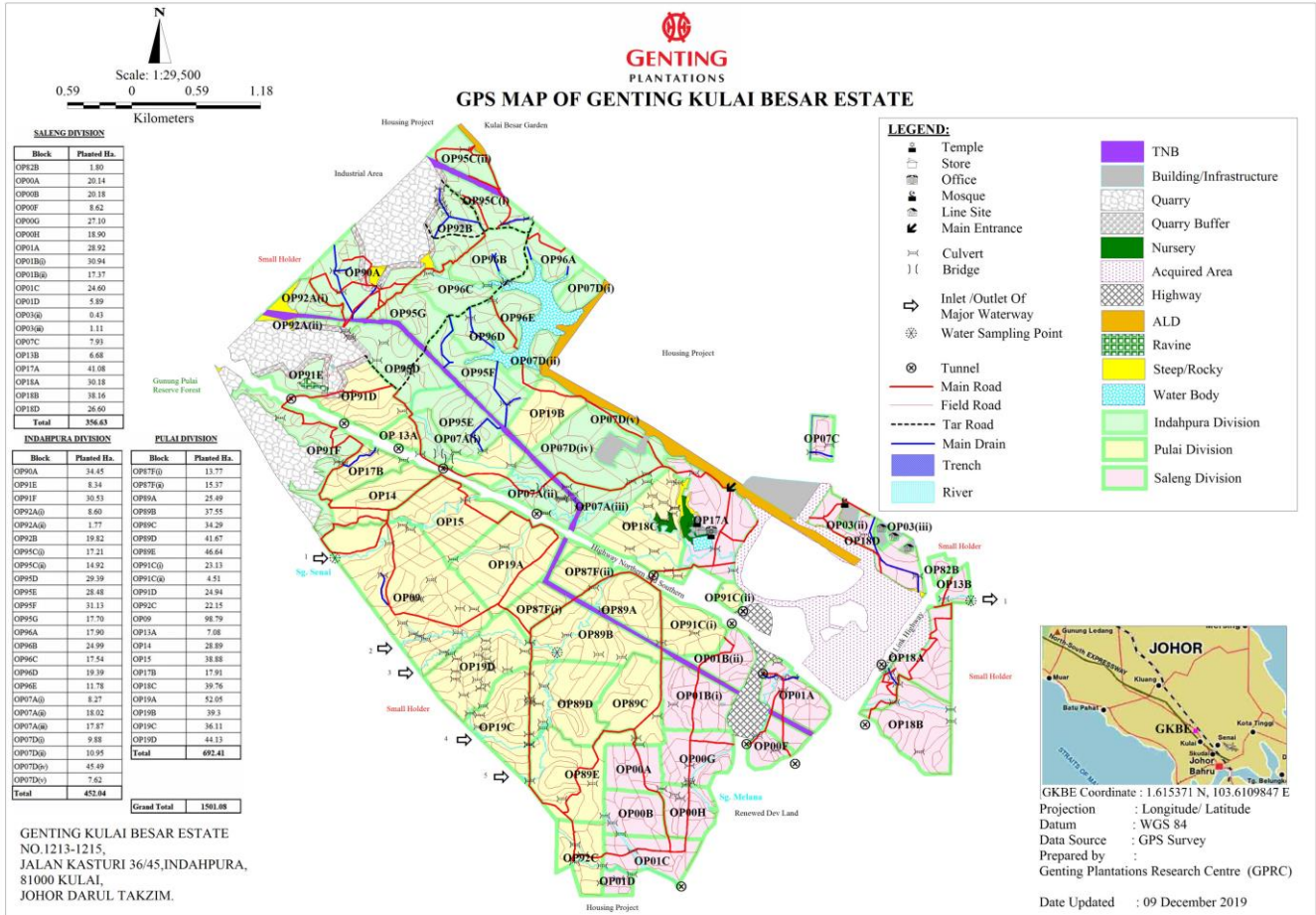
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases

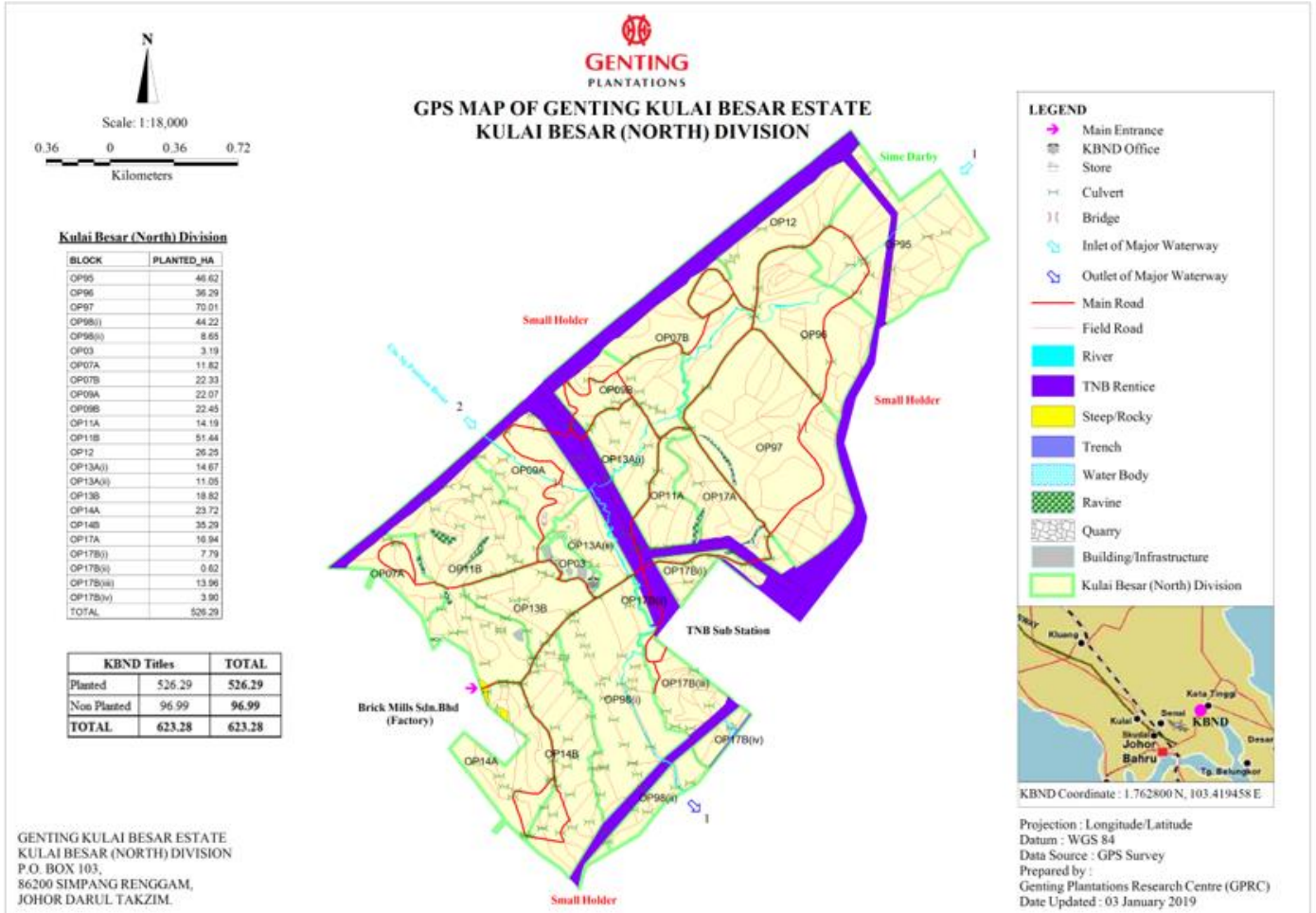


Appendix D: Estate Field Map

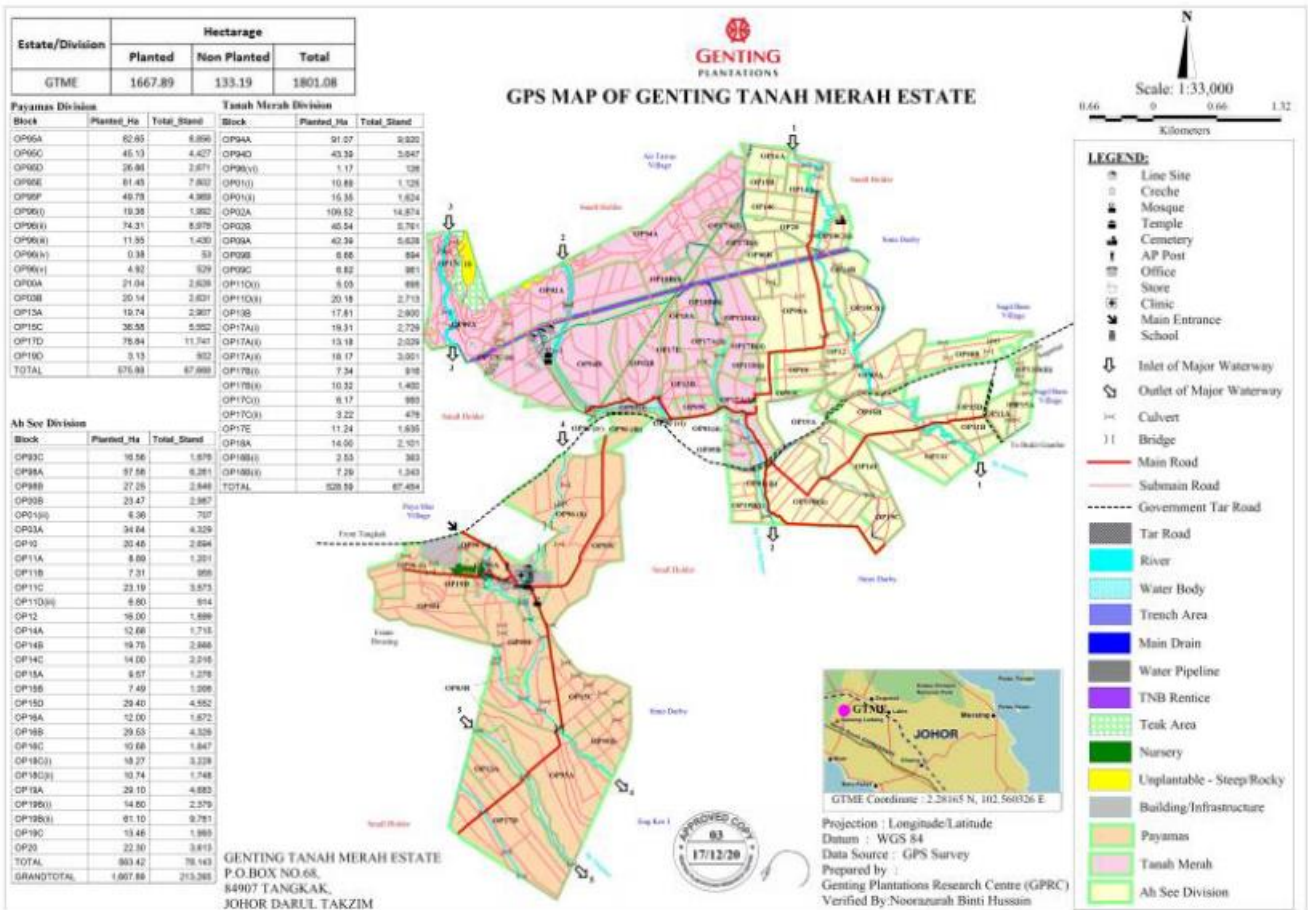
Genting Kulai Besar Estate (Main Div.)



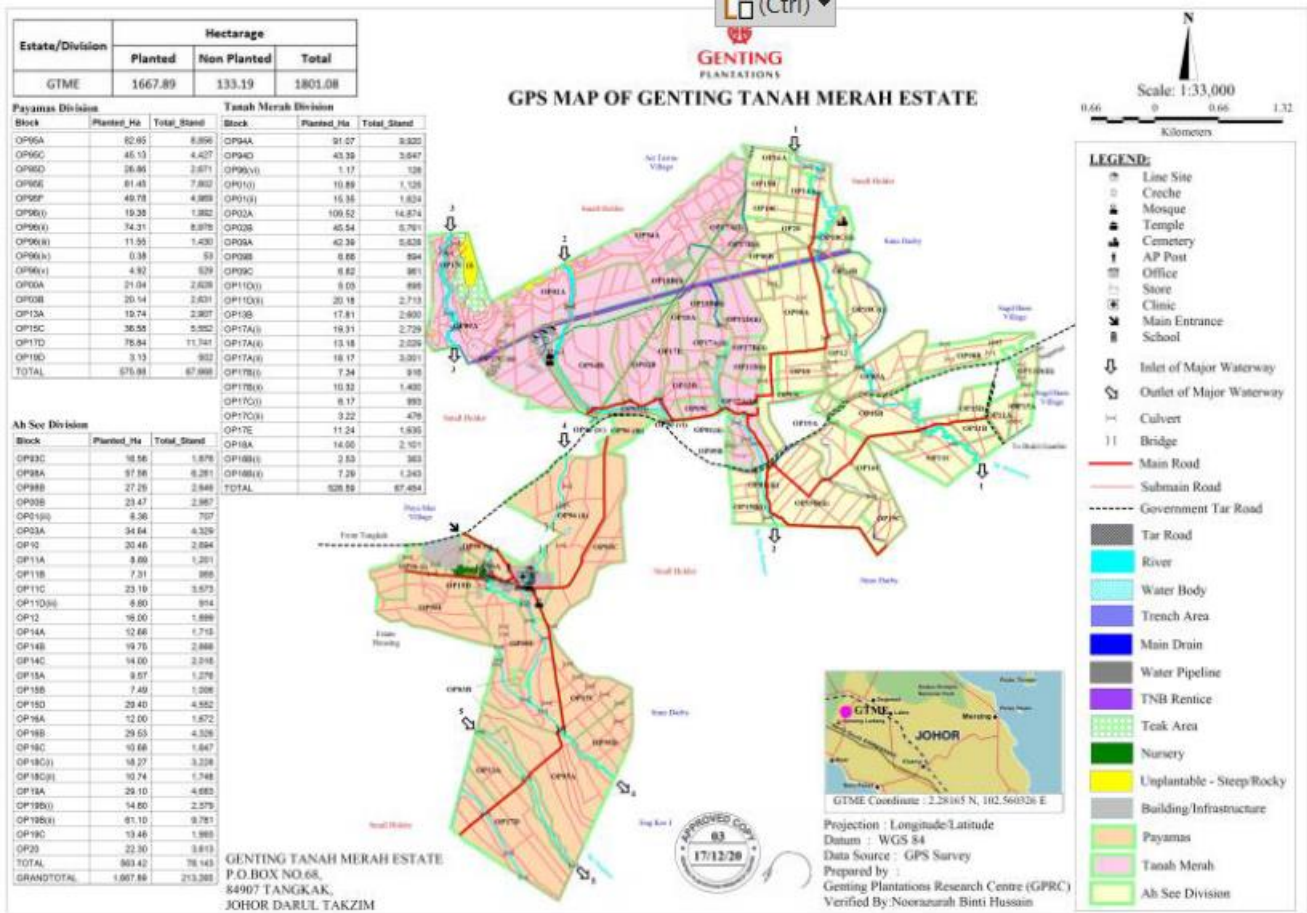
Genting Kulai Besar Estate (North Div.)



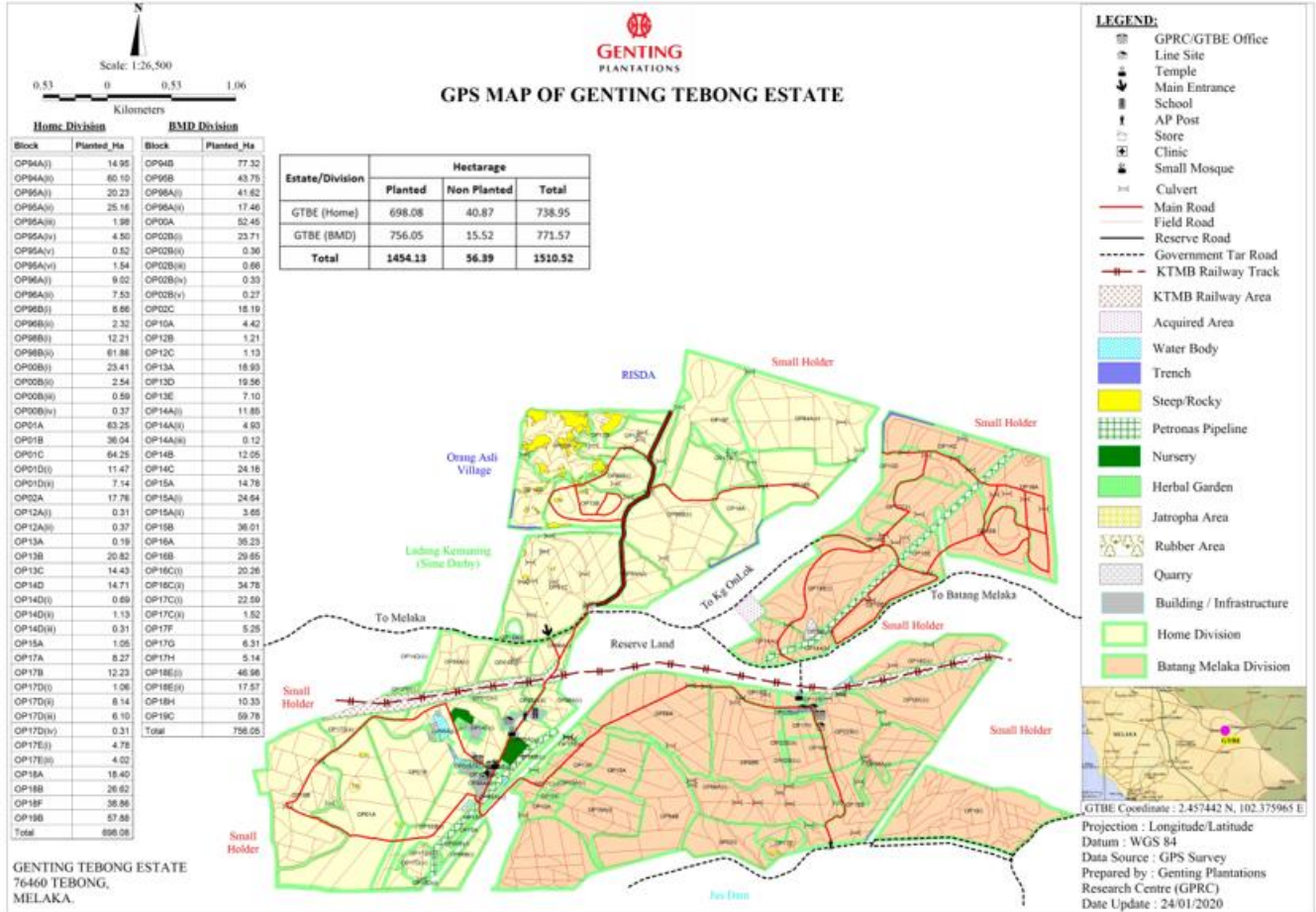
Genting Sri Gading Estate



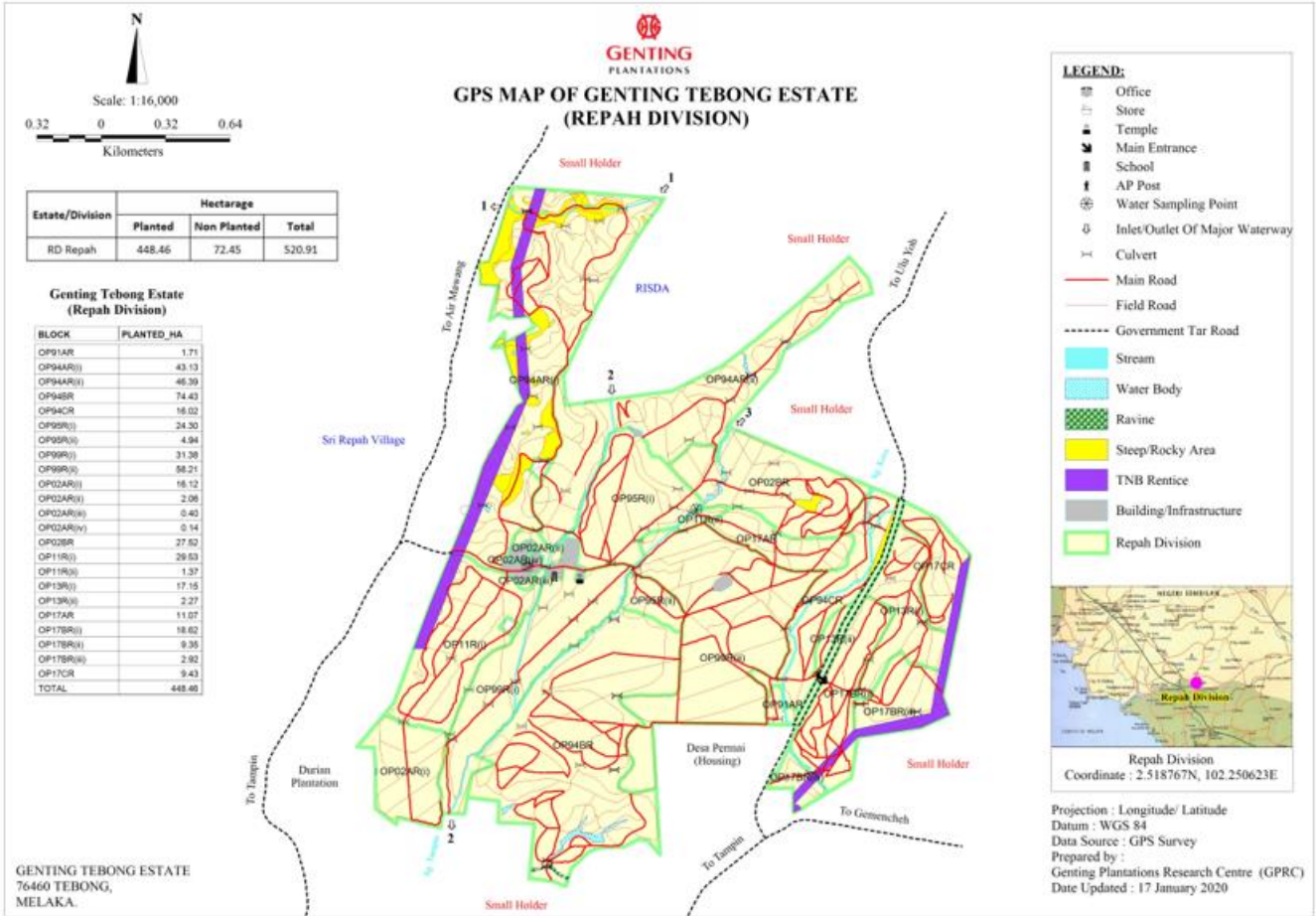
Genting Tanah Merah Estate



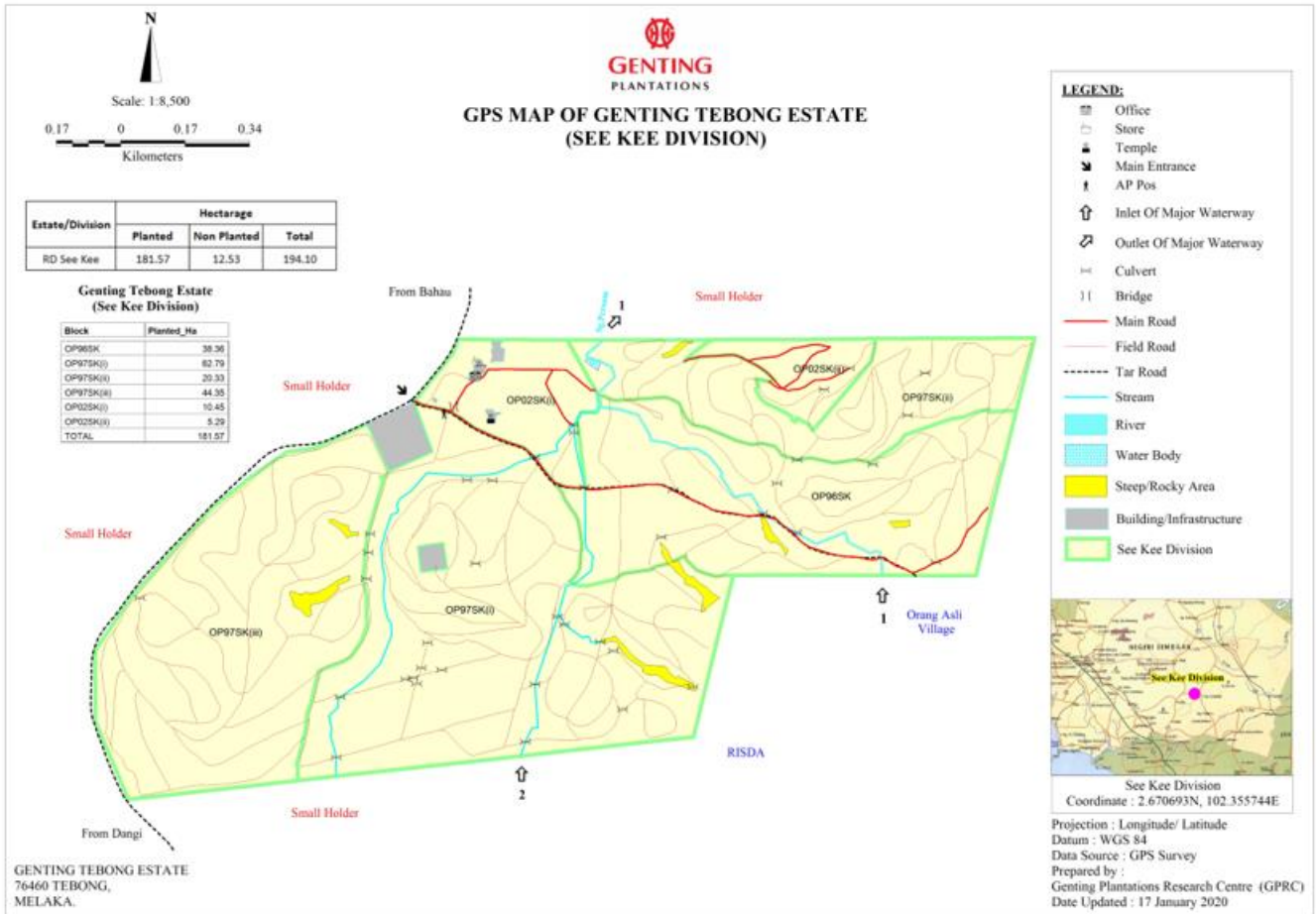
Genting Tebong Estate (Main Div.)



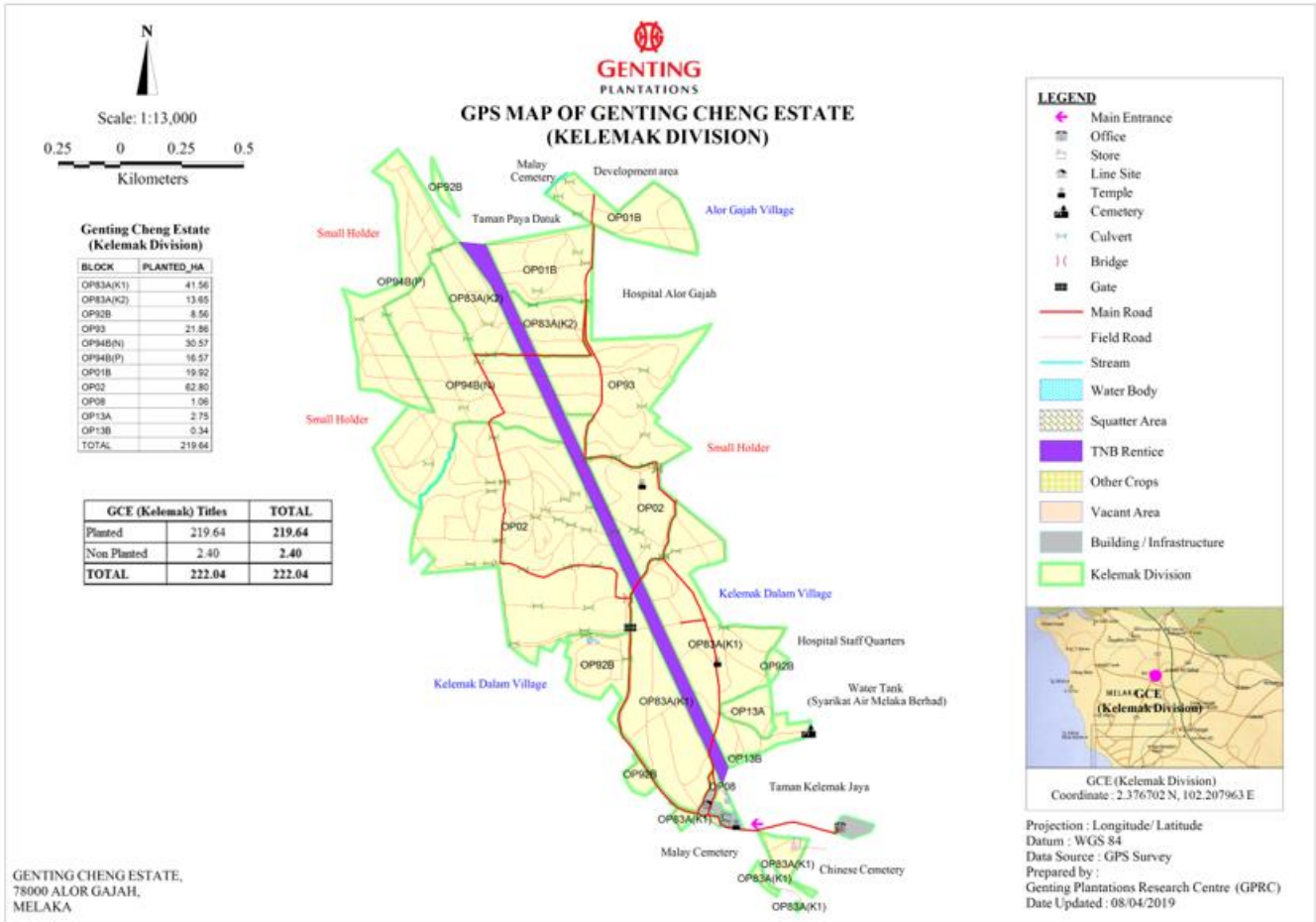
Genting Tebong Estate (Repah Div.)



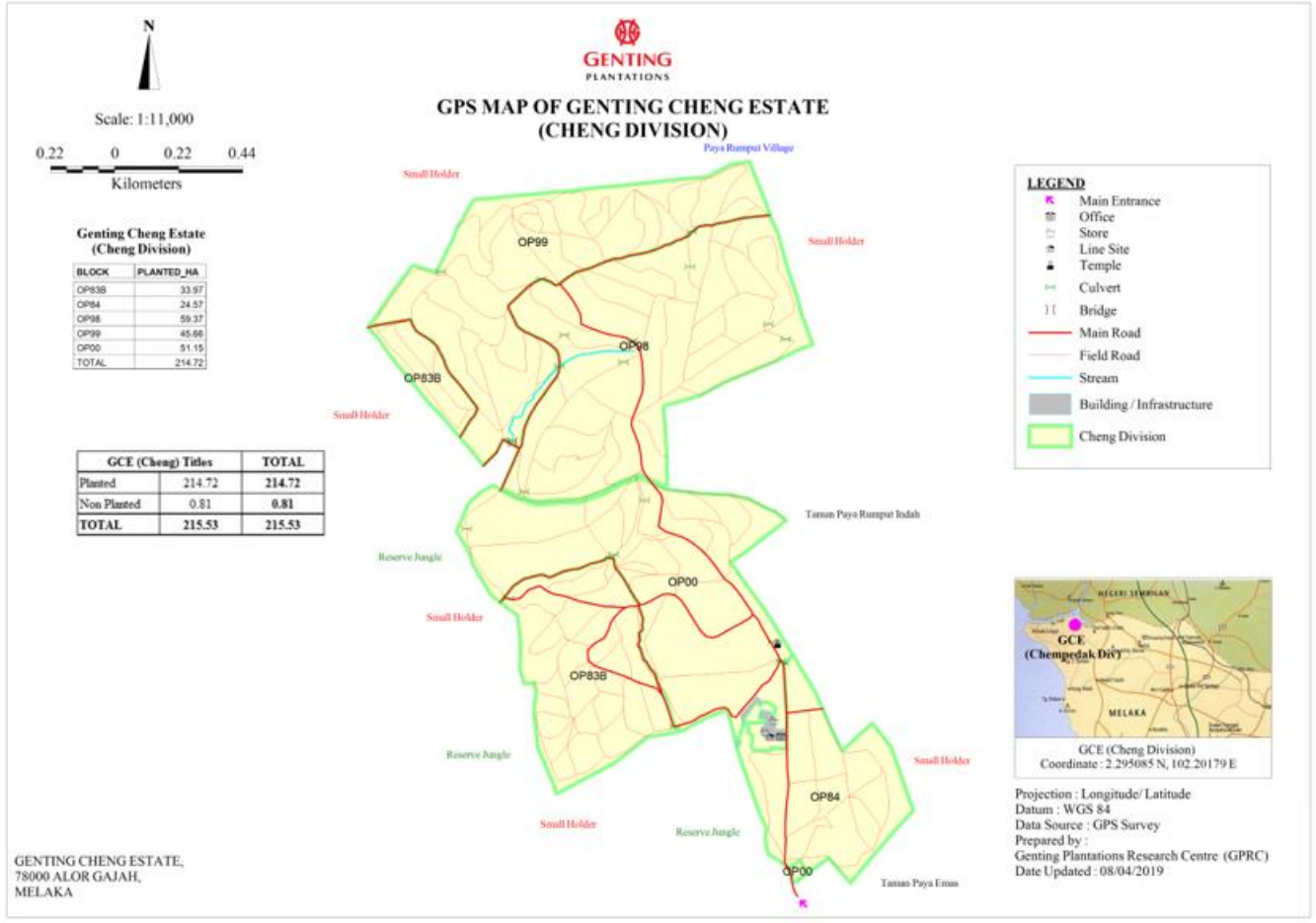
Genting Tebong Estate (See Kee Div.)



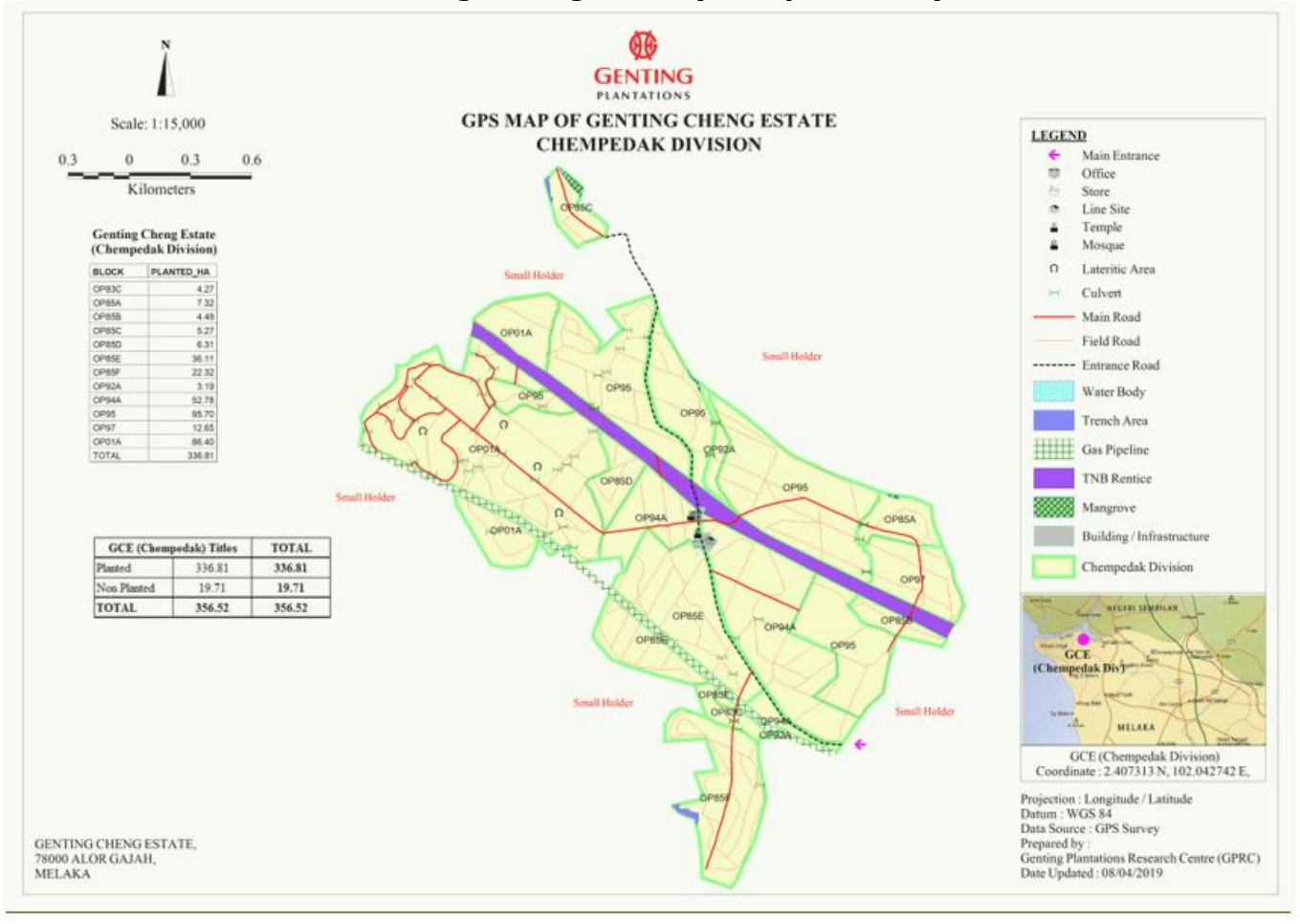
Genting Tebong Estate (Kelemak Div.)



Genting Tebong Estate (Cheng Div.)



Genting Tebong Estate (Chempedak Div.)



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Appendix E: List of Smallholder Registered and/or sampled

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
Not applicable									
Total									

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