

**MALAYSIAN SUSTAINABLE PALM OIL  
3<sup>rd</sup> ANNUAL SURVEILLANCE ASSESSMENT (ASA 3)  
Public Summary Report**

<b>GENTING PLANTATIONS BERHAD</b>
Client company Address: 10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
Certification Unit: Genting Ayer Item Oil Mill & Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate
Location of Certification Unit: Batu 54, Jalan Johor 86100 Ayer Hitam, Johor, Malaysia

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**Report Number: 3293247**

**Assessment Conducted by:**  
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## Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	Genting Plantations Berhad		
Mill/Estate	MPOB License No.	Expiry Date	
	Genting Ayer Item Oil Mill 500056-704000	31/01/2023	
	Genting Kulai Besar Estate 509591-102000 508595-302000 540060-011000	30/04/2021 30/04/2021 31/05/2021	
	Genting Sri Gading Estate 508592-902000 508842-111000 524435-102000	03/04/2021 30/06/2021 31/10/2021	
	Genting Sungei Rayat Estate 508590-202000 501298-102000	30/04/2021 31/03/2021	
	Genting Tanah Merah Estate 538065-011000 559916-701000 611773-002000 609122-002000 513814-002000 617898-021000	31/03/2021 28/02/2021 31/05/2021 29/02/2021 30/06/2021 31/12/2021	
	Genting Tebong Estate 501803-202000 539822-011000 501667-602000 501866-102000	30/11/2021 31/05/2021 31/03/2021 31/12/2021	
	Address	Head office: 10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia	
Certification Unit	Genting Ayer Item Palm Oil Mill and supply bases		
Contact Person Name	Mr Arunan Kandasamy (Senior Vice President-Plantations Malaysia)		
Website	<a href="http://www.gentingplantations.com">http://www.gentingplantations.com</a>	E-mail	arunan.kandasamy@genting.com
Telephone	03-2333 6401	Facsimile	-

1.2 Certification Information			
Certificate Number	Mill : MSPO 682363 Plantations : MSPO 696629		
Issue Date	29/06/2018	Expiry date	28/06/2023
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products		

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	Estate: Production of Sustainable Oil Palm Fruits		
Standard	MS 2530-3:2013 - General Principles for Oil Palm Plantations and Organized Smallholders MS 2530-4:2013 - General Principles for Palm Oil Mills		
Stage 1 Date	N/A (The certification unit is RSPO certified)		
Stage 2 / Initial Assessment Visit Date (IAV)	22-23/01/2018		
Continuous Assessment Visit Date (CAV) 1	11-14/02/2019		
Continuous Assessment Visit Date (CAV) 2	10-13/02/2020		
Continuous Assessment Visit Date (CAV) 3	16-19/02/2021 (Remote Audit)		
Continuous Assessment Visit Date (CAV) 4	-		
<b>Other Certifications</b>			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE119-60193390	ISCC EU	ASG Cert GmbH	23/10/2021
RSPO 653474	RSPO Principles & Criteria for Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019; with Identity Preserved Supply Chain Module	BSI Services Malaysia Sdn Bhd	25/03/2025
MSPO 716638	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018.	BSI Services Malaysia Sdn Bhd	23/10/2024
GTME: MPOB/CoP/NN/0003-2	Code of Good Nursery Practice for Oil Palm Nurseries	MPOB	16/09/2021
GTBE: MPOB/CoP/NN/0269-1	Code of Good Nursery Practice for Oil Palm Nurseries	MPOB	28/11/2022
GSGE: MPOB/CoP/NN/0023-2	Code of Good Nursery Practice for Oil Palm Nurseries	MPOB	01/05/2022

### 1.3 Location of Certification Unit

Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Genting Ayer Item Oil Mill	86100 Ayer Hitam, Johor, Malaysia	1.85671	103.20999
Genting Kulai Besar Estate	81000 Kulai, Johor, Malaysia	1.61537	103.61099
Genting Sri Gading Estate	83009 Batu Pahat, Johor, Malaysia	1.83829	103.01823
Genting Sungei Rayat Estate	83009 Batu Pahat, Johor, Malaysia	1.90404	103.01069
Genting Tanah Merah Estate	84907 Tangkak, Johor, Malaysia	2.28165	102.56033
Genting Tebong Estate	75990 Tebong, Melaka, Malaysia	2.45744	102.37597

1.4 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Kulai Besar Estate	2,027.37	35.06	779.62	2,842.05	71.30
Genting Sri Gading Estate	3,309.73	29.93	391.72	3,731.38	88.70
Genting Sungei Rayat Estate	2,300.78	0.18	78.02	2,378.98	96.70
Genting Tanah Merah Estate	2,044.96	46.60	150.49	2,242.05	91.20
Genting Tebong Estate	2,872.40	45.29	92.04	3,009.73	95.40
<b>TOTAL</b>	<b>12,555.24</b>	<b>157.06</b>	<b>1,491.89</b>	<b>14,204.19</b>	<b>88.40</b>

**Note:**  
 For GSSE: 2020 planted ha = 3,227.80 ha; 2021 planted ha = 3,309.73 ha; increase by 81.93 ha. This is due to area under 'Setiamas' (a subsidiary) - 71.24 ha missed to be included inside the certified area previously. Another 10.29 ha is due to GPS ha adjustment.

1.5 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Kulai Besar Estate	522.87	379.16	415.94	345.71	363.69	1,504.50	522.87
Genting Sri Gading Estate	623.25	829.42	829.61	517.27	510.18	2,686.48	623.25
Genting Sungei Rayat Estate	288.04	269.11	1250.52	348.22	144.89	2,012.74	288.04
Genting Tanah Merah Estate	196.72	474.42	614.59	322.34	436.89	1,848.24	196.72
Genting Tebong Estate	532.18	548.24	534.66	817.63	439.69	2,340.22	532.18
<b>Total (ha)</b>	2163.06	2500.35	3645.32	2351.17	1895.34	10,392.18	2,163.06

1.6 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Mar 2020 - Feb 2021)	Actual (Feb 2020 - Jan 2021)	Forecast (Mar 2021 - Feb 2022)
Genting Kulai Besar Estate	38,540	36,953.62	36,146
Genting Sri Gading Estate	57,560	59,317.59	70,893
Genting Sungei Rayat Estate	50,491	50,572.74	53,816
Genting Tanah Merah Estate	26,765	*26,360.77	*34,162
Genting Tebong Estate	29,223	**25,918.31	**11,360

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<b>Total</b>	<b>202,579</b>	<b>199,123.03</b>	<b>206,377</b>
<b>Note:</b>			
<i>Balance crop from GTME &amp; GTBE will be diverted to 3rd party mills as follows:</i>			
<i>The above is actual supplied to GAIOM</i>			
<i>*GTME supply to Lenga Palm Oil Mill, Fermanegh Palm Oil Mill = 13,232 mt</i>			
<i>**GTBE supply to T.E. Sdn Bhd, Havys Palm Oil Mill, Gedok Palm Oil Mill = 25,091 mt</i>			

<b>1.7 Uncertified Tonnage of FFB</b>			
Estate	Tonnage / year		
	Estimated (Mar 2020 - Feb 2021)	Actual (Feb 2020 - Jan 2021)	Forecast (Mar 2021 - Feb 2022)
Nil	Nil	Nil	Nil
<b>Total</b>	Nil	Nil	Nil

<b>1.8 Certified Tonnage</b>			
Mill Capacity: 60 MT/hr  SCC Model: SG	Estimated (Mar 2020 - Feb 2021)	Actual (Feb 2020 - Jan 2021)	Forecast (Mar 2021 - Feb 2022)
	FFB	FFB	FFB
	202,579	199,123.03	206,377
	CPO (OER: 21.03 %)	CPO (OER: 20.07 %)	CPO (OER: 21.00 %)
	42,602.36	39,954.86	43339.17
	PK (KER: 5.35 %)	PK (KER: 5.10 %)	PK (KER: 5.35 %)
	10,837.98	10,157.16	11,041.17

<b>1.9 Actual Sold Volume (CPO)</b>					
CPO (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
39,804.42	-	-	36,965.71	2,838.71	39,804.42

<b>1.10 Actual Sold Volume (PK)</b>					
PK (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
10,041	-	-	9,840.88	200.12	10,041

## Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 190 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

### Assessment Methodology, Programme, Site Visits

This full remote assessment for Annual Surveillance Audit (ASA3) was conducted due to Pandemic COVID-19 from 16-19/02/2021. The audit programme is included as Section 2.3. This remote audit has been conducted using Information and Communication Technologies including (Microsoft Teams, WhatsApp and phone call). The planned audit objectives have been achieved, there were no connectivity issues which adversely affected the audit. The approach to the audit was to treat the Genting Ayer Item and Supply base Certification Unit as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

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. MS 2530-3:2013 and MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The estates or smallholders sample were determined based on formula  $S = r\sqrt{n}$  where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula  $(r\sqrt{n})$ ; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix C.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the MSPO 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 remotely. Field workers were interviewed informally in small groups remotely. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix B.

All the previous nonconformities are remains closed. The assessment findings from initial assessment are detailed in Section 4.2.

This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

This report was externally reviewed by MSPO approved Peer Reviewer prior to certification decision by BSI.

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

<b>Assessment Program</b>					
<b>Name (Mill / Plantation / Group smallholders)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
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 14, 2022 - February 17, 2022**

**Total No. of Mandays: 15 mandays**

**2.1 BSI Assessment Team**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Nor Halis Abu Zar (NHA)	Team Leader	He holds Bachelor of Science, Plantation Technology and Management, graduated from Universiti Teknologi Mara. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Halis had accumulated more than 6 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. He is a qualified Lead Auditor for MS2530:2013 and has accumulated more than 300 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia. He has completed ISO IMS 9001, 14001 Lead Auditor Course in January 2019, MSPO 2530:2013 Lead Auditor Course in February 2019 and endorsed RSPO Lead Auditor Course in October 2020. Fluent in Bahasa Malaysia and English Language. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environment, and workers consultation.
Muhammad Fadzli Masran (MFM)	Team Member	He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his

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		<p>career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers’ welfare, workers’ occupational, health &amp; safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. Fluent in Bahasa Malaysia and English Language. During this assessment, he assessed on the aspects of social, legal, workers and stakeholders’ consultation.</p>
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**2.2 Accompanying Persons**

No.	Name	Role
1.	Mohamed Hidhir Zainal Abidin (MHZA)	Qualifying Reviewer

**2.3 Assessment Plan**

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

Date	Time	Subjects	(NHA)	(MFM)	(MHZA)	ICT Planned
Friday, 05/02/2021	1600 - 1700	Communication on document preparation - Audit plan - Any additional Information	√	√	√	Teleconference, Microsoft Team Meeting, Email
Tuesday, 16/02/2021 Genting Ayer Item Oil Mill	0900 - 0915	Opening meeting - Opening presentation by audit team leader - Confirmation of assessment scope and finalize audit plan	√	√	√	Teleconference, Microsoft Team Meeting, Email
	0915 - 1030	Assessment and documentation review on mill best practice, legal requirements, OHS, environment and continual improvement	√		√	Teleconference, Microsoft Team Meeting, Email
	1030 - 1040	10-minute break	√		√	
	1040 - 1230	Assessment and documentation review on mill best practice, legal requirements, OHS, environment and continual improvement	√		√	Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch & Break	√	√	√	
	1330 - 1450	Assessment and documentation review on social aspects, legal requirements, employees’ welfare and stakeholder management			√	Teleconference, Microsoft Team Meeting, Email

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Date	Time	Subjects	(NHA)	(MFM)	(MHZA)	ICT Planned
	1450 - 1500	10-minute break		√		
	1500 - 1700	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management		√		Teleconference, Microsoft Team Meeting, Email
	1700 - 1730	Interim closing briefing	√		√	Teleconference, Microsoft Team Meeting, Email
Wednesday, 17/02/2021 Genting Tebong Estate	0915 - 1030	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	√		√	Teleconference, Microsoft Team Meeting, Email
	1030 - 1040	10-minute break	√		√	
	1040 - 1230	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	√		√	Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch & Break	√	√	√	
	1330 - 1450	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management		√		Teleconference, Microsoft Team Meeting, Email
	1450 - 1500	10-minute break		√		
	1500 - 1700	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management		√		Teleconference, Microsoft Team Meeting, Email
	1700 - 1730	Interim closing briefing	√	√	√	Teleconference, Microsoft Team Meeting, Email
Thursday, 18/02/2021 Sri Gading Estate	0915 - 1030	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management		√		Teleconference, Microsoft Team Meeting, Email
	1030 - 1040	10-minute break		√		
	1040 - 1230	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management		√		Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch & Break	√	√	√	

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Date	Time	Subjects	(NHA)	(MFM)	(MHZA)	ICT Planned
	1330 - 1450	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	√		√	Teleconference, Microsoft Team Meeting, Email
	1450 - 1500	10-minute break	√		√	
	1500 - 1600	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	√		√	Teleconference, Microsoft Team Meeting, Email
	1600 - 1630	Assessment team discussion and preparation of closing meeting	√	√	√	Teleconference, Microsoft Team Meeting, Email
	1630 - 1700	Interim closing briefing	√	√	√	Teleconference, Microsoft Team Meeting, Email
Friday, 19/02/2021 Tanah Merah Estate	0915 - 1030	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management		√		Teleconference, Microsoft Team Meeting, Email
	1030 - 1040	10-minute break		√		
	1040 - 1230	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management		√		Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch & Break	√	√	√	
	1330 - 1450	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	√		√	Teleconference, Microsoft Team Meeting, Email
	1450 - 1500	10-minute break	√		√	
	1500 - 1600	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	√		√	Teleconference, Microsoft Team Meeting, Email
	1600 - 1630	Assessment team discussion and preparation of closing meeting	√	√	√	Teleconference, Microsoft Team Meeting, Email
	1630 - 1700	Closing meeting	√	√	√	Teleconference, Microsoft Team Meeting, Email

### Section 3: Assessment Findings

#### 3.1 Details of audit results

This assessment has been assessed using the following MSPO normative requirements. The assessment details are provided in Appendix A.

- MSPO MS 2530-2:2013 – General Principles for Independent Smallholders
- MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders
- MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

#### 3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During the Certification Assessment there were 0 Major, 0 Minor nonconformities and 3 OFIs raised.

Major / Minor Nonconformities:		
Ref:	Area/Process:	Clause:
N/A	Issue Date:	Due Date:
Requirements:		
Statement of Nonconformity:		
Objective Evidence:		
Corrections:		
Root cause analysis:		
Corrective Actions:		
Assessment Conclusion:		

Opportunity For Improvement		
Ref:	Area/Process:	Clause:
2019032-202102-I1	Genting Tebong Estate (GTBE)	MS 2530:2013 Part-3 4.3.1.3
Objective Evidence:	Related to List of Legal Registers and List of Laws and Regulation as per SMP-GPB-22, Management should ensure the consistency of their updated document.	

Opportunity For Improvement		
Ref:	Area/Process:	Clause:
2019032-202102-I2	Genting Tebong Estate (GTBE)	MS 2530:2013 Part-3 4.4.4.2 (g)
Objective Evidence:	Related to frequency of Osh Meeting refer Part IV Section 21 OSHA Regulation 1996, management should consider other method or platform to conduct OSH committee meeting during new norm of Covid 19.	

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<b>Opportunity For Improvement</b>		
<b>Ref:</b> 2019032-202102-I3	<b>Area/Process:</b> Genting Sri Gading Estate (GSGE)	<b>Clause:</b> MS 2530:2013 Part-3 4.4.4.2 (i)
Objective Evidence:	Since management has cease Paraquat usage as per SMP-GPB-28 dated September 2020 Rev 05, management could update their First Aid Box guideline and remove any unnecessary medicine (Fuller Earth) in the First Aid Box.	

<b>Noteworthy Positive Comments</b>	
1	Good cooperation from the management team in facilitation the assessment.
2	Good relationship being maintained with surrounding communities.

**3.3 Status of Nonconformities Previously Identified and OFI**

<b>Major Nonconformities:</b>		
<b>Ref:</b> 1883366-202002-M1	<b>Area/Process:</b> Genting Ayer Item POM	<b>Clause:</b> 4.4.4.2 Part 4
	<b>Issue Date:</b> 13/2/2020	<b>Due Date:</b> 12/5/2020
Requirements:	The occupational safety and health plan should cover the following;- e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.	
Statement of Nonconformity:	No proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.	
Objective Evidence:	Sighted during site visit at Boiler area, the Acetic acid and Phenolphthalein indicator was been handling and store in cupboard without safety precaution and SDS not in accordance to Class Reg 2013 and Phenolphthalein (29 August 2018) Section 7 handling and storage.	
Corrections:	Immediately stop the testing at boiler area and send the chemical to the lab. All the testing must be under fume hood.	
Root cause analysis:	<ol style="list-style-type: none"> <li>1) No proper training on the requirements for the said chemical</li> <li>2) No proper monitoring &amp; inspection on chemical handling procedure by Safety &amp; Health Committee.</li> </ol>	
Corrective Actions:	<ol style="list-style-type: none"> <li>1) To train lab personnel and boiler team on the SDS and CLASS Regulation 2013</li> <li>2) To ensure stringent checking / inspection on chemical management /procedure at workplace by Safety &amp; Health Committee.</li> </ol>	
Assessment Conclusion:	<p>As verification as per below document:</p> <ol style="list-style-type: none"> <li>1) Photo of removal place for boiler water testing</li> <li>2) Photo of new boiler water testing place at boiler station &amp; laboratory</li> <li>3) Training record for SDS and CLASS Regulation 2013 dated</li> </ol> <p>The corrective action is found to be effectively implemented; thus the major NC is closed on 31/03/2020. Continuous implementation will be further verified in the next audit.</p>	

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Verification Statement	<p>ASA 3 verification:</p> <p>The following manuals contained SOP for chemical handling and used as a procedure in handling chemicals. SOP (safety working instruction) SOP-PRD-14 dated 30/06/2019, to handle the chemical for water testing must be handle by competent person with proper PPE and the test must be conduct at specific area as per requirement. Both were issued from Head Office and used in all operating units within the Group. SDS were kept in the file and workplace through verification during interview. Awareness training on handling of chemicals and SDS has been scheduled for the year of 2021.</p> <p>No recurrence of previous year findings hence the Major NC remained closed.</p>
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<b>Major Nonconformities:</b>		
<b>Ref:</b> 1883366-202002-M2	<b>Area/Process:</b> Genting Ayer Item POM and Supply base	<b>Clause:</b> 4.5.3.3 Part 3
	<b>Issue Date:</b> 13/2/2020	<b>Due Date:</b> 12/5/2020
Requirements:	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.	
Statement of Nonconformity:	No proper and safe handling on storage and disposal as per Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974.	
Objective Evidence:	In Genting Sungei Rakyat Estate, dispensary was available as one of facilities that company prepared for workers. The SW 404 clinical waste was generate, sighted latest disposal was on 26 June 2019 (consignment note 01275152) to Kualiti Alam Sdn Bhd. However the inventory record was not available for SW404. Sighted SW 312 (Oily residue from workshop and oil trap) was dispose at drain side and not according to Scheduled waste Reg 2005. Inventory record referred AS(B)J11/123/000/079. Thus Major NC been raised.	
Corrections:	<ol style="list-style-type: none"> <li>1) The waste had been collected by the appointed licensed contractor - Cenviro on 19th February'20. Inventory record for the SW 404 had been started by the current HA.</li> <li>2) The workshop compound was cleaned immediately and the oily residue was collected and stored in the Scheduled Waste store.</li> </ol>	
Root cause analysis:	<ol style="list-style-type: none"> <li>1) There was movement/change of Hospital Assistant between June'19 to September'19 and October'19 to January'20. During the period, both the new HAs were not trained on the Clinical Waste Management and monitoring. Both the new HAs had resigned on September'19 and January'20 respectively.</li> <li>2) Workshop upkeep and cleaning work done monthly, however the oily residue are not collected and stored as Scheduled Waste due to lack of training and supervision during the upkeep work by the Supervisor/Storekeeper.</li> </ol>	
Corrective Actions:	<ol style="list-style-type: none"> <li>1) Retraining on the Scheduled Waste Management were done on 21st February'20 to the Assistant Manager, Staff, Storekeeper, Hospital Assistant and Workshop Attendant.</li> <li>2) For the new worksite inspection, OSH Committee to be trained on the Scheduled Waste Management.</li> </ol>	

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Assessment Conclusion:	<p>As per evidence below:-</p> <ol style="list-style-type: none"> <li>1. Consignment Notes of SW 404 dated 19/02/2020</li> <li>2. Inventory record of SW 404</li> <li>3. Training on scheduled waste management</li> <li>4. Workshop - worksite inspection</li> </ol> <p>The corrective action is found to be effectively implemented, thus the major NC is closed on 31/03/2020. Continuous implementation will be further verified in the next audit.</p>
Verification Statement	<p>ASA 3 verification:</p> <p>The procedure was established (Scheduled waste Management, SMPGPB- 11, Rev 01, Dated 11/06/2018). Scheduled wastes were sent to authorized collectors such as Southern Strength (M) Sdn Bhd. Latest E-Swiss report sighted:</p> <p>GTBE: ASMK(B)11/123/000/005 dated 10/12/2020</p> <p>GSGE: AS(B)J11/123/000/078 dated 16/02/2021</p> <p>GTME: AS(B)J11/123/000/062 dated 30/01/2021</p> <p>Verification of 5<sup>th</sup> Schedule records showed that SW were not kept more than 180 days.</p> <p>Sighted evidence of sample latest disposal report:</p> <p>GTBE: 2021020918KSEDS – SW410 dated 09/02/2021</p> <p>GSGE: 20210106WFUSRE – SW406 dated 07/01/2021</p> <p>GTME: 2021011316B8N3AK – SW 305 dated 13/01/2021. No recurrence of previous year findings hence the Major NC remained closed.</p>

Major Nonconformities:		
<b>Ref:</b> 1883366-202002-M3	<b>Area/Process:</b> Genting Ayer Item POM and Supply base	<b>Clause:</b> 4.5.3.3 Part 4
	<b>Issue Date:</b> 13/2/2020	<b>Due Date:</b> 12/5/2020
Requirements:	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005.	
Statement of Nonconformity:	No proper and safe handling on storage and disposal as per Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974.	
Objective Evidence:	<p>Noted during site visit and interview with boiler man, it was noted that the mill conducted test at boiler using acetic acid and Phenolphthalein , the contaminated waste water from the test was not identified as SW 322 and dispose to the drain the disposal was not conducted as Scheduled waste 2005.</p> <p>Sighted broken fluorescent lamps dumped within staff quarters in the bin near house # S7 and S11. Sighted also few fluorescent lamps kept in bin at recycle bin station within workers quarters near block B Sighted an air compressor been used at staff</p>	

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	quarters at house # S13 seems like operating a motorcycle workshop with spent lubricant been kept at house without proper handling
Corrections:	<ol style="list-style-type: none"> <li>1) Stop the testing boiler water quality at boiler area and all testing at laboratory</li> <li>2) Immediately transfer the fluorescent lamp to SW store.</li> <li>3) Immediately stop the practices and ask workers to remove the compressor and clean the house area.</li> <li>4) To take immediate action on non-conforming issue raised by EPMC during inspection.</li> <li>5) Competent person (CePSWaM) shall monitor &amp; review the activity that involve scheduled wastes handling and train the personal to follow the scheduled wastes regulations &amp; guidelines.</li> </ol>
Root cause analysis:	<ol style="list-style-type: none"> <li>1) No proper training regarding SW management</li> <li>2) No proper monitoring / inspection on scheduled wastes management by competent person (CePSWaM)</li> </ol>
Corrective Actions:	<ol style="list-style-type: none"> <li>1) Register boiler water testing as SW 322 in e-SWIS</li> <li>2) To retrain all workers and residence on SW Management and awareness</li> <li>3) To stringent the line site inspection and educate people regarding SW and recycling matter.</li> </ol>
Assessment Conclusion:	<p>As per evidence below:-</p> <ol style="list-style-type: none"> <li>1) Photo of clear housing area from compressor / workshop and flouresence lamp</li> <li>2) Line site record book dated 4 March 2020</li> <li>3) Training record on SW Management &amp; awareness was conducted on 13 March 2020</li> <li>4) 2nd &amp; 5th Scheduled (file no; AS(B)J31/152/000/004)</li> </ol> <p>The corrective action is found to be effectively implemented, thus the major NC is closed on 31/03/2020. Continuous implementation will be further verified in the next audit.</p>
Verification Statement	<p>ASA 3 verification:</p> <p>SOP for handling scheduled wastes has been established entitled Waste Management. Ref doc no. SP-MGR-09 rev. 4 dated 10/09/2020 in order to comply with the Environmental Quality Regulations (Scheduled Waste) 2005.</p> <p>The mill has a proper Scheduled Waste Store for storing scheduled waste (inventory record) until time of disposal by DOE authorized waste disposal contractor.</p> <p>Sighted the sampled scheduled waste disposal records:</p> <ol style="list-style-type: none"> <li>1. 12/01/2021 for SW 430; C/N no: 2021011211V9FKP4</li> <li>2. 12/01/2021 for SW 322; C/N no: 2021011211KDOQYG</li> </ol> <p>No recurrence of previous year findings hence the Major NC remained closed.</p>

<b>Major Nonconformities:</b>		
<b>Ref:</b> 1883366-202002-M4	<b>Area/Process:</b> Genting Ayer Item POM and Supply base	<b>Clause:</b> 4.6.1.1 Part 4
	<b>Issue Date:</b> 13/2/2020	<b>Due Date:</b> 12/5/2020
<b>Requirements:</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	

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Statement of Nonconformity:	Found SOP (safety working instruction) dated Dec 2016 inconsistently of implemented and monitored
Objective Evidence:	The PTW dated 1/2/2019 have been approved by assistant to declare that Boilermec (contractor) was followed as per SOP and Legal requirement however sighted Oxyacetylene tank was not store properly during site visit at Boiler area as per SOP (safety working instruction) dated Dec 2016.
Corrections:	To train contractors to tighten up or place the oxy-acetylene at the proper trolley as per SOP.
Root cause analysis:	No proper monitoring and training to the contractors.
Corrective Actions:	1) Give briefing / training to contractor as to ensure follow the SOP in PTW. 2) Safety committee member shall monitor and make sure all the PTW is comply and follow correctly.
Assessment Conclusion:	As per verification on evidence below:- 1) Photo of Oxyacetylene tank 2) Briefing / training record The corrective action is found to be effectively implemented, thus the major NC is closed on 31/03/2020. Continuous implementation will be further verified in the next audit.
Verification Statement	ASA 3 verification: The mill operations are supervised by the staff, Engineers of the Mill. Training for contractor has been prepared once the contractor entered to the mill for the project. HIRARC and SOP indicates that contractor will be given awareness training related Safety and Health, Environment, Legal and Best Practice. Their tools will be checked to avoid any unlicensed equipment. No recurrence of previous year findings hence the Major NC remained closed.

Major Nonconformities:		
<b>Ref:</b> 1883366-202002-M5	<b>Area/Process:</b> Genting Ayer Item POM and Supply base	<b>Clause:</b> 4.4.5.11 Part 3
	<b>Issue Date:</b> 13/2/2020	<b>Due Date:</b> 12/5/2020
Requirements:	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.	
Statement of Nonconformity:	The above requirement was not adequately addressed for Clause # 23 "Weekly Inspection of Worker's Housing" (2)	
Objective Evidence:	Last housing inspection records as per Line Site Checklist Genting Kulai Besar Estate shown inspection done on Week 4 for November 2019 for Housing # W01 – W30. No records of inspection conducted for December 2019 until todote.	
Corrections:	New Assistant was recruited and assigned to carry out the inspection with effect from Feb 2020.	
Root cause analysis:	Shortage of qualified personel to carry out the linesite inspection since the retirement of Hospital Assistant (HA) and resignation of an Assistant Manager since December 2019.	

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Corrective Actions:	<ul style="list-style-type: none"> <li>- To train the existing staff to carry out the linesite inspection in the absence of HA or Assistant.</li> <li>- To recruit a qualified HA.</li> </ul>
Assessment Conclusion:	As per record of Linesite Inspection Form for Feb 2020 show the linesite inspection was done weekly basis. The corrective action is found to be effectively implemented, thus the major NC is closed on 31/03/2020. Continuous implementation will be further verified in the next audit.
Verification Statement	<p>ASA 3 verification:</p> <p>Sighted management has assigned HA to conduct weekly inspection for linesite. Refer Weekly Inspection Record book for the month of January 2021 and December 2020.</p> <p>No recurrence of previous year findings hence the Major NC remained closed.</p>

**3.4 Summary of the Nonconformities and Status**

CAR Ref.	CLASS	ISSUED	STATUS
1736818-201902-M1	Major	14/2/2019	Closed on 29/4/2019
1736818-201902-M2	Major	14/2/2019	Closed on 29/4/2019
1736818-201902-M3	Major	14/2/2019	Closed on 29/4/2019
1736818-201902-M4	Major	14/2/2019	Closed on 29/4/2019
1736818-201902-N1	Minor	14/2/2019	Closed on 13/2/2020
1883366-202002-M1	Major	13/2/2020	Closed on 31/3/2020
1883366-202002-M2	Major	13/2/2020	Closed on 31/3/2020
1883366-202002-M3	Major	13/2/2020	Closed on 31/3/2020
1883366-202002-M4	Major	13/2/2020	Closed on 31/3/2020
1883366-202002-M5	Major	13/2/2020	Closed on 31/3/2020

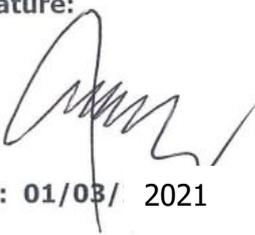
**3.5 Issues Raised by Stakeholders**

IS #	Description
<b>1</b>	<p><b>Issues:</b> NUPW Malacca Region</p> <p>Recruitment for foreign workers were low. The NUPW region will started to conduct recruitment from estates to estates on the Movement Control order is lifted. The NUPW seek cooperation from the estates to help promoting the NUPW.</p> <p><b>Management Responses:</b></p> <p>The estates will give full cooperation for all program planned by the NUPW and the estates respect the employee rights to joint NUPW.</p> <p><b>Audit Team Findings:</b></p> <p>No further Issue</p>

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2	<p><b>Issues:</b> Neighbouring Smallholders</p> <p>No land disputes between the smallholders and the estates. The estates give permission to pass through the estates to the smallholder’s farm.</p>
	<p><b>Management Responses:</b></p> <p>Positive comment noted.</p>
	<p><b>Audit Team Findings:</b></p> <p>No further Issue</p>
3	<p><b>Issues:</b> Kg. Sri Maju</p> <p>The estates and mill always give cooperation and contributions to the neighbouring village when needed. The mill also provided job opportunities to the villager’s base on their competency and qualifications.</p>
	<p><b>Management Responses:</b></p> <p>Positive comment noted.</p>
	<p><b>Audit Team Findings:</b></p> <p>No further Issue</p>
4	<p><b>Issues:</b> Cattle owners</p> <p>There is no issue raised. The estates always communicated with the cattle owners through meetings and phone call. The owners aware on the conditions not to release the cattle into replanting areas</p>
	<p><b>Management Responses:</b></p> <p>The management continue to communicate with the cattle owners to ensure no cattle release at the replanting areas</p>
	<p><b>Audit Team Findings:</b></p> <p>No further Issue</p>

**Section 4: Assessment Conclusion and Recommendation**

<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>		
Based on the findings during the assessment <i>Genting Ayer Item POM and Supply Bases</i> Certification Unit complies with the <b>MS 2530-3:2013</b> and <b>MS 2530-4:2013</b> . It is recommended that the certification of <i>Genting Ayer Item POM and Supply Bases</i> Certification Unit is approved, and continued.		
<b>Acknowledgement of Assessment Findings</b>	<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<b>Name:</b> Arunan Kandasamy	<b>Name:</b> Choo Huan Boon	<b>Name:</b> Nor Halis Abu Zar
<b>Company name:</b> Genting Plantation Berhad	<b>Company name:</b> Genting Plantation Berhad	<b>Company name:</b> BSI Service Malaysia Sdn Bhd
<b>Title:</b> SVP Plantation (Malaysia)	<b>Title:</b> SVP-Processing and Downstream	<b>Title:</b> Client Manager
<b>Signature:</b>  Date: 01/03/ 2021	<b>Signature:</b>  Date: 01/03/ 2021	<b>Signature:</b>  Date: 01/03/2021

**Appendix A: Summary of the findings by Principles and Criteria**

**MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Oil Palm Plantations and Organized Smallholders**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	A policy for the implementation of MSPO shall be established. - <b>Major compliance -</b>	Genting Plantations Berhad has established MSPO Policy signed by the President and Chief Operating Officer dated 18/3/2014. The policy was communicated to the employee through training, briefing and displayed on notice board at several strategic places in the operating unit.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. - <b>Major compliance -</b>	The MSPO Policy emphasis the company commitment to establish and maintain an effective sustainability management system throughout the organization and ensure compliance with MSPO and MPOB Code of Practice.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - <b>Major compliance -</b>	Genting Plantations Berhad has established SOP for Sustainability Internal Audit documented in Sustainability Management Procedure Manual, Sustainability Internal Audit. Refer doc. no. SMP-GPB-03, rev. 05 dated 09/2020. The SOP covered the items includes: 1. Audit criteria 2. Audit Schedule and Audit Plan 3. Lead Auditor and Team Leader Responsibility	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		4. Closing Meeting 5. Auditee Responsibility 6. Internal Auditor responsibility 7. Operating unit manager responsibility 8. Records retention of 5 years	
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. <b>- Major compliance -</b>	Internal Audit reports and Corrective Action Plan were kept for at least 5 years as per SOP established. The internal audit result were discussed during the management review meeting.	Complied
<b>4.1.2.3</b>	Report shall be made available to the management for their review. <b>- Major compliance -</b>	Internal audit was conducted by Manager – Sustainability based in Headquarters in Kuala Lumpur. The internal audit was conducted as per SOP established. <u>GTBE</u> Latest Internal Audit was conducted on 21 – 26/01/2021 by Manager – Sustainability. No non-conformity were issued during the audit. The audit report were available for review dated 29/01/2021. <u>GSGE</u> Latest internal audit was conducted on 27/01/2021. No non-compliance were raised during the audit as per report by the Manager-Sustainability dated 29/01/2021. <u>GTME</u> Latest internal audit was conducted on 19 - 20/01/2021. No non-compliance were raised during the audit as per report by the Manager-Sustainability dated 29/01/2021.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<b>Criterion 4.1.3 – Management Review</b>		
<b>4.1.3.1</b>	<p>The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.</p> <p><b>- Major compliance -</b></p> <p>The management conducted the Management Review Meeting on annually basis. Reviewed the latest Management Review Meeting (Southern Region) dated 08/01/2021. Among the agenda discussed in the MRM were:</p> <ol style="list-style-type: none"> <li>1. Minutes/Actions of previous meeting</li> <li>2. RSPO/MSPO Audit schedule and certification status</li> <li>3. Changes and improvement on sustainability management system</li> <li>4. Results on internal audit</li> <li>5. Complaints and grievances</li> <li>6. Enquiry register</li> <li>7. Stakeholder meeting/minutes</li> <li>8. Greenhouse gas</li> <li>9. Continual improvement and recommendations</li> <li>10. Resource training requirements</li> <li>11. Sustainability policies</li> <li>12. Review of effectiveness in achieving quality, environment, social, safety and health objectives</li> <li>13. Compliance to legal requirements</li> <li>14. Supply chain and traceability</li> <li>15. Preventive and corrective actions</li> </ol>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	<p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p><b>- Major compliance -</b></p>	<p>The sampled estates has established the continuous improvement plan in consideration of environmental and social impacts.</p> <p>The estates reviewed the plan established on annually basis. latest review was conducted as follows:</p> <p>GTBE – 06/01/2021            GSGE – 08/01/2021            GTME – 09/01/2021</p> <p>Among the sampled continuous improvement plan as follows:</p> <ol style="list-style-type: none"> <li>1. Use of alternative pesticides that are safe and less toxic i.e. Basta and Glyphosate.</li> <li>2. Expand IPM programme.</li> <li>3. Regular monitoring of water quality.</li> <li>4. To hold annual recycling campaign</li> <li>5. Carry out interior and exterior painting for workers quarters</li> <li>6. To monitor full availability of worker’s documents</li> </ol>	<p>Complied</p>
<b>4.1.4.2</b>	<p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p><b>- Major compliance -</b></p>	<p>The new information and techniques to improve practices are obtained mainly through information from communications with suppliers and being members of associations related to palm oil industry.</p> <p>Any new information on new technology will be forwarded to the HQ for approval before any implementation.</p>	<p>Complied</p>
<b>4.1.4.3</b>	<p>An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be</p>	<p>Action plans were available in all the visited estates, the action plan is cover for environment, workers’ needs, safety and others. Trainings</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
	established. <b>- Major compliance -</b>	on SOPs were also conducted from time to time to enhance the current techniques of agriculture best practice.	
<b>4.2 Principle 2: Transparency</b>			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
<b>4.2.1.1</b>	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. <b>- Major compliance -</b>	Genting Plantations Berhad has established SOP for consultation and communication documented in Sustainability Management Procedure Manual, Procedure for consultation and communication. Refer doc. no. SMP-GPB-17, rev. 02 dated 23/02/2018. The consultation and communication was conducted through stakeholder meeting, dialogs, request letter, phone call between the mill and stakeholder (internal and external). The consultation and communication were recorded in the enquiry register book. As the MCO restricted the stakeholders’ consultation meeting to be conducted, the estate has taken initiative to send correspondent letter/email to the stakeholders for feedbacks.	Complied
<b>4.2.1.2</b>	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. <b>- Major compliance -</b>	All documents required by this indicator are made publicly available to all stakeholders. The estate managers has issued Memorandum to all stakeholders on the publicly available documents. The stakeholder were required to fill in the Enquiry Register Book in order to access the documents. Sustainability Report and Annual Report are published annually and made publicly available at website: <a href="http://www.gentingplantations.com">www.gentingplantations.com</a> .	Complied
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			

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Criterion / Indicator	Assessment Findings	Compliance
<p><b>4.2.2.1</b> Procedures shall be established for consultation and communication with the relevant stakeholders.  <b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has established SOP for consultation and communication documented in Sustainability Management Procedure Manual, Procedure for consultation and communication. Refer doc. no. SMP-GPB-17, rev. 02 dated 23/02/2018.</p> <p>The consultation and communication was conducted through stakeholder meeting, dialogs, request letter, phone call between the mill and stakeholder (internal and external).</p> <p><u>GTBE</u></p> <p>Latest stakeholder consultation meeting 30/01/2020 for external stakeholders and 12/02/2020 for internal stakeholders. The findings during the stakeholders consultation has been captured in the Social Impact Assessment and management plan has been established.</p> <p><u>GSGE</u></p> <p>As the MCO restricted the stakeholders' consultation meeting to be conducted, the estate has taken initiative to send correspondent letter/email to the stakeholders for feedbacks as per email/letter dated 24/10/2020. The stakeholders provided the feedbacks through letter, email and verbally. Reviewed the feedbacks from Land Department as recorded in the Enquiry Register book with reference no. 030 dated 12/11/2020.</p> <p><u>GTME</u></p> <p>As the MCO restricted the stakeholders' consultation meeting to be conducted, the estate has taken initiative to send correspondent letter/email to the stakeholders for feedbacks. Reviewed the feedbacks from stakeholders as recorded in the Enquiry Register book with reference no. 117 dated 18/01/2021, 097 dated 14/01/2020 and 114 dated 25/11/2020.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. <b>- Minor compliance -</b>	Genting Plantations Berhad has appointed the Senior Estate Manager/Estate Manager as responsible person for consultation and communication as per appointment letter signed by the Senior Vice President – Group Processing dated 18/11/2015.  In the appointment letter stated the responsibility of the management representative person responsible for consultation and communication.  Additionally, the estates sampled appointed Asst. Manager as person responsible for consultation and communication as per reviewed appointment letter for GSGE signed by the Sr. Estate Manager dated 01/01/2021.	Complied
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. <b>- Major compliance -</b>	Stakeholder list was sighted and last updated on FY 2021 where local communities, government authorities, internal workers, contractors and suppliers were included into the list.  Enquiry Register Book was implemented in the mill and estates. All the enquiries were recorded in the enquiry book.	Complied
<b>Criterion 4.2.3 – Traceability</b>			
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). <b>- Major compliance -</b>	Established as Sustainability Management Procedure for Traceability; SMP-GPB-09; Rev. 04; Date: 24/8/2018	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	Regular inspections conducted regularly by estate management with assistance from HQ Sustainability Personnel whom conducted periodical internal audit. Details of internal audit as per Criterion 4.1.2 above.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>GTBE, regular inspection has been conducted during PI &amp; RIA visit dated 23/10/2020.</p> <p>GSGE, regular inspection has been conducted during PI &amp; RIA visit dated 17/07/2020.</p> <p>GTME, regular inspection has been conducted during PI &amp; RIA visit dated 19-22/10/2020.</p>	
<b>4.2.3.3</b>	<p>The management should identify and assign suitable employees to implement and maintain the traceability system.</p> <p><b>- Minor compliance -</b></p>	<p>GTBE: As per letter of Appointment as Person In-Charge for Traceability Requirements of RSPO, ISCC and MSPO Sustainability Standards of Nursyafiqah Bte Amran; Date: 20/01/2020.</p> <p>GTME: As per letter of Appointment as Person In-Charge for Traceability Requirements of RSPO, ISCC and MSPO Sustainability Standards of Mr Swinder A/L Krisnan dated 01/01/2021.</p> <p>GSGE: As per letter of Appointment as Person In-Charge for Traceability Requirements of RSPO, ISCC and MSPO Sustainability Standards of Mr Mohd Ahmad Firdaus Yahya dated 07/01/2021</p>	Complied
<b>4.2.3.4</b>	<p>Records of sales, delivery or transportation of FFB shall be maintained.</p> <p><b>- Major compliance -</b></p>	<p>FFB delivery records maintained as per sample weighbridge tickets sighted as following. Ticket were stamped with 3 types of stamp which is ISCC Certified, MSPO Certified FFB and RSPO Certified FFB.</p> <p><u>GTBE</u></p> <p>-Date: 28/07/2020            Chit Number: FFB20003459W            Lorry Number: KEP8979            Weight: 41.44 MT</p> <p>-Date: 22/07/2020            Chit Number: FFB20003360W</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	Lorry Number: KEP8979 Weight: 40.56 MT <u>GSGE</u> -Date: 29/03/2020 Chit Number: FFB20002420W Lorry Number: BCD4479 Weight: 14.08 -Date: 29/03/2020 Chit Number: FFB20000886W Lorry Number: BCD4479 Weight: 14.20 MT <u>GTME</u> -Date: 16/07/2020 Chit Number: FFB20000974W Lorry Number: WKN428 Weight: 6.62 MT -Date: 19/07/2020 Chit Number: FFB20000977W Lorry Number: JTN5122 Weight: 35.32 MT	
<b>4.3 Principle 3: Compliance to legal requirements</b>		
<b>Criterion 4.3.1 – Regulatory requirements</b>		

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<p><b>4.3.1.1</b> All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.  <b>- Major compliance -</b></p>	<p>Estate operations are in compliance with the applicable local, state, national and ratified international laws and regulations. Legal Requirement Register (LRR) Document No. SMP-GPB-22 (rev 09) dated October 2020 was available for verification.</p> <p><u>GTBE</u></p> <ol style="list-style-type: none"> <li>1. MPOB license 501803202000 valid until 30/11/2021</li> <li>2. License for Peraturan Kawalan Bekalan 1974 SK(M)382/2003(D) valid until 30/07/2021</li> <li>3. Weighbridge calibration from Metrology referred 2.1KQ004902 valid until 01/10/2021</li> <li>4. Licence for Armor valid until 30/06/2021</li> <li>5. Permit for salary deduction for electricity Refer JTK/M/(PMT)10401/2015/0016(NN).</li> </ol> <p><u>GSGE</u></p> <ol style="list-style-type: none"> <li>1. MPOB license 524435102000 valid until 31/10/2021</li> <li>2. KPDNKK for diesel license as per letter J000319 valid until 27/03/2021</li> <li>3. Weighbridge calibration was done by Metrology Corporation dated 11/09/2020 (2.1K Q009891)</li> <li>4. Air compressor JH PMT 17731 valid until 24/12/2020 (Renewal has been postponed by JKPP due to MCO as per evidence email dated 10/1/2021)</li> <li>5. License for salary deduction as per license from JTK (HQ/A/P/KP.4/90) dated 31/12/2014</li> </ol> <p><u>GTBE</u></p> <ol style="list-style-type: none"> <li>1. MPOB license 611773002000 valid until 31/05/2021</li> </ol>	<p>Complied</p>

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		2. License for Peraturan Kawalan Bekalan 1974 MR/PD/SK-0439 valid until 101/10/2021 3. Air Compressor Licence JH PMT 17439 valid until 16/03/2021 4. Permit BAKAJ Enekmen Air (Johor) 1921 Lesen Melencong atau Mengabstrak Air Sungai BAKAJ:334/300/05/04/06/1 valid until 31/12/2021.	
<b>4.3.1.2</b>	The management shall list all laws applicable to their operations in a legal requirements register. <b>- Major compliance -</b>	The relevant laws were listed in Legal Requirement Register (LRR) [SMP-GPB-22 (rev 09) dated October 2020]. Among the laws covered in the list were EQA, Employment Act, OSHA, FMA to name a few. The amendment/update of the list is done by Systems, Methods, Insurance and Risk Management Department (based in KL).	Complied
<b>4.3.1.3</b>	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. <b>- Major compliance -</b>	In Genting Plantations Berhad, the Legal register and requirement already been updated by System and Method department. Among the newly registered laws were: 1. Minimum Wages Order 2020 2. Minimum Housing Standard and Amenities Act 1990 (Act 446) (Revised 2020) 3. Prevention and Control Disease 1988 (Act342) (Revised 2020) Related to List of Legal Registers and List of Laws and Regulation as per SMP-GPB-22, Management should ensure the consistency of their updated document.	OFI
<b>4.3.1.4</b>	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. <b>- Minor compliance -</b>	A mechanism for tracking changes in law is guided by SMPM Procedures on Regional, National and International Laws [SMP-GPB-21 (rev 07) dated October 2020]. Generally, the mechanism is by monitoring or consultation with various sources (e.g. Government	Complied

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		<p>agencies, electronic &amp; non-electronic media, legal firms, professional bodies, industry association/organization and NGO).</p> <p>GTBE: As per letter of Appointment as Person In-Charge for Updating Changes in Laws of Ms Muniammal (Chief Clerk) dated 20/01/2020.</p> <p>GSGE: As per letter of Appointment as Person In-Charge for Updating Changes in Laws of Pn Kamariah Hj Sulaiman (Chief Clerk) dated 01/01/2021.</p> <p>GTME: As per letter of Appointment as Person In-Charge for Updating Changes in Laws of Ms Sa'dah Salleh (Chief Clerk) dated 8/01/2021.</p>																									
<b>Criterion 4.3.2 – Lands use rights</b>																											
<b>4.3.2.1</b>	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p><b>- Major compliance -</b></p>	<p>There was no evidence to show that oil palm cultivation activities at the sampled estates had diminished the land use rights of others. Verified documents to show legal ownership of its land.</p>	Complied																								
<b>4.3.2.2</b>	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p><b>- Major compliance -</b></p>	<p>Verified the land titles shown that the legal ownership of the company. Sample of land title as below:</p> <p><u>GTBE</u></p> <table border="1"> <thead> <tr> <th>Title no.</th> <th>Lot no.</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td>GRN 9074</td> <td>5</td> <td>237.3326</td> </tr> <tr> <td>GRN 50012</td> <td>2021</td> <td>119.0000</td> </tr> <tr> <td>29681</td> <td>3798</td> <td>194.4000</td> </tr> <tr> <td>G00057587</td> <td>5726</td> <td>163.0000</td> </tr> <tr> <td>10582</td> <td>245</td> <td>42.5289</td> </tr> </tbody> </table> <p><u>GSGE</u></p> <table border="1"> <thead> <tr> <th>Title no.</th> <th>Lot no.</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td>H.S.D 67550</td> <td>PTD 63586</td> <td>3047.6000</td> </tr> </tbody> </table>	Title no.	Lot no.	Hectare	GRN 9074	5	237.3326	GRN 50012	2021	119.0000	29681	3798	194.4000	G00057587	5726	163.0000	10582	245	42.5289	Title no.	Lot no.	Hectare	H.S.D 67550	PTD 63586	3047.6000	Complied
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4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. <b>- Major compliance -</b>	Sighted Map of boundary markers. Verified availability of boundary monitoring record.	Complied																		
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). <b>- Minor compliance -</b>	There is no land dispute in sampled estates at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified. Verified there was no land disputes during phone call interview with the stakeholders.	Complied																		
<b>Criterion 4.3.3 – Customary rights</b>																					
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. <b>- Major compliance -</b>	There is no customary land or negotiated agreements within sampled estates land area. Verified there was no land disputes during phone call interview with the stakeholders.	N/A																		
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. <b>- Minor compliance -</b>	There is no customary land or negotiated agreements within sampled estates land area.	N/A																		

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		Verified there was no land disputes during phone call interview with the stakeholders.	
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. <b>- Major compliance -</b>	There is no customary land or negotiated agreements within sampled estates land area. Verified there was no land disputes during phone call interview with the stakeholders.	N/A
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. <b>- Minor compliance -</b>	<p>Latest Social impact Assessment was conducted on October and November 2019 by the Sustainability Manager as per Social Impact Assessment (SIA) Report Genting Sri Gading Estate, Genting Tanah Merah Estate and Genting Tebong Estate dated 28/01/2020.</p> <p>The estate has established Social Management and Monitoring Plan base on the findings identified during the social impact assessment and stakeholder’s consultation conducted. Noted during interview with the stakeholders, the estate management discussed regarding any issue with the stakeholders regularly. Among the issues raised during the social impact assessment and stakeholder’s consultation conducted and captured in the management plan as follows:</p> <p><u>GTBE</u></p> <ol style="list-style-type: none"> <li>1. SJKT Tebong Estate Head Master, Ms Devika, will request for permission for car park garage, this can be used as ‘shade’ as well during sports day. The top management had approved and the car garage had done on December 2020.</li> </ol>	Complied

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		<p>2. Temple Head, En. Loganathan Balakrishnan, issued on upkeep, spraying &amp; grass cutting of temple compound – used to be done by estate before, but since 3 years ago, we no longer get the assistance from the estate. The estate management already agreed to do grass cutting once every month.</p> <p><u>GSGE</u></p> <p>1. Local workers request to do road side pruning along the road heading to Kg. Baru – Div. 1</p> <p>2. Local workers complaining on heavy vehicles entering the labour quarters. The estate has fix bar gate prevent the heavy vehicles from entering the labour quarters.</p> <p><u>GTME</u></p> <p>Due to pandemic Covid-19, new norm have been approached by sending suggestion and consultation letter to stakeholder.</p>			
<b>Criterion 4.4.2: Complaints and grievances</b>					
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented. <b>- Major compliance -</b>	Genting Plantations Berhad has established SOP for dealing with complaints and documented in Sustainability Management Procedure Manual, Complaints and Grievances. Refer doc. no. SMP-GPB-19, rev. 04 dated March 2020.	Complied		
<b>4.4.2.2</b>	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. <b>- Major compliance -</b>	<p>As per SOP established, the Mill Management shall review and take all necessary action within 1 month from receipt of the complaint or grievances. Reviewed the records of sampled complaints and grievances as follow:</p> <p><u>GTBE</u></p> <table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">Date Received</td> <td style="width: 50%;">Date Solved</td> </tr> </table>	Date Received	Date Solved	Complied
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		13/05/2020 – House no. LQ 118 reported Lamp at the kitchen and hall not functioning and fan not functioning.	20/05/2020 – all repair work has been done.	
		13/06/2020 – LQ Home division reported that no water supply at the house and LED lamp not functioning.	25/06/2020 – Change new LED lamp and repair work to the piping has been completed.	
		<u>GSGE</u>		
		<u>Date Received</u>	<u>Date Solved</u>	
		09/06/2020 – Sjn. Rahmat requested the management to fix fences at the Axillary Police housing area for safety purpose.	10/08/2020 – The fences fixing work has been completed.	
		08/08/2020 – House no A-5 reported that the fan in the room not functioning	05/09/2020 – the estate has replaced with new set of fan.	
		<u>GTME</u>		
		<u>Date Received</u>	<u>Date Solved</u>	
		19/11/2020 – Workers complaint on the street light near house no. LQ 54 not functioning	19/11/2020 – repair job was done.	

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4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - <b>Minor compliance</b> -	Noted all workers were aware on the complaints and grievances book/form as per SIA report dated 28/01/2020. Noted during interview with workers/gender committee representative and stakeholders, the awareness on the complaints procedure is satisfactory.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - <b>Minor compliance</b> -	Noted all workers were aware on the complaints and grievances book/form as per SIA report dated 28/01/2020. Noted during interview with workers/gender committee representative and stakeholders, the awareness on the complaints procedure is satisfactory.  As the Movement Control Order prevent the stakeholder meeting to be conducted FY 2020, the estate has made initiative to send the correspondent email/Stakeholder Suggestion/ Complaints/ Feedback form.	Complied
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - <b>Major compliance</b> -	Complaints and resolutions has been documented and made available to affected stakeholders upon request. Seen complaint and requests book available from 2013 more than 24 months.	Complied
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - <b>Minor compliance</b> -	Contributions made based on consultation with relevant stakeholders as per following sample: <u>GTBE</u> 1. Sponsoring paint to Ketua Kampung Kuala Sungga 2. Sponsoring refrigerator to Tebong Police Station <u>GSGE</u> 1. Provide facilities for army from Syed Sirajuddin Camp to conduct training on 01 – 31/10/2020	Complied

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		2. Contribution for employee school children needs dated 31/12/2020 <u>GTME</u> 1. Deepavali contribution to workers dated 28/10/2020 2. Hari Raya Contribution to workers dated 22/05/2020 3. Covid rescue contribution for workers dated 18/03/2020 4. Landfilling at school field dated 06/12/2020 5. Contribution to school sports day dated 13/02/2020	
<b>Criterion 4.4.4: Employees safety and health</b>			
<b>4.4.4.1</b>	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. <b>- Major compliance -</b>	The Occupational Safety And Health Policy was established, signed by President and Chief Operating Officer on 01/07/2018. The policy was communicated during Policy briefing from time to time. The policy was displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH personnel from Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors. In interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the policy.	Complied
<b>4.4.4.2</b>	The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:	a) The Occupational Safety and Health Policy was established, signed by President and Chief Operating Officer on 01/07/2018. Latest policy has been communicated on: GTBE: 06/01/2021 GSGE: 22/10/2020 GTME: 14/05/2020	OFI

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<ul style="list-style-type: none"> <li>i. all employees involved shall be adequately trained on safe working practices</li> <li>ii. all precautions attached to products shall be properly observed and applied</li> <li>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</li> <li>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</li> <li>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</li> <li>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</li> <li>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</li> </ul>	<p>Sighted evidence of training material, attendance, and photo.</p> <p>b) For risk in the operation the management conducted the assessment and establish the HIRARC for all activities such as harvesting, pruning, spraying, manuring, general work, office, store activities and others dated January 2021. Including in the HIRARC document related Covid-19 SOP. HIRARC has been reviewed as per any accident cases and new law coming into force. For chemical safety chemical hazard risk assessment (CHRA) already been conducted:</p> <p>GTBE: JKPP HIE 127/171-2(154)-2017/011 dated 30/6/2017            GSGE: JKPP HIE 127/171-2(154)-2017/008 dated 25/6/2017            GTME: JKPP HIE 127/171-2(154)-2017/010 dated 30/6/2017</p> <p>Verified action plan has been recorded for assessor recommendation and all recommendation has been conducted.</p> <p>Verified medical surveillance has been conducted. Checking on medical surveillance report for Chemical Storekeeper, Sprayer, Manurer and Foreman.</p> <p>c) Sighted Safety and Health Management Plan 2021 for GTBE, GSGE and GTME prepared on January 2021. Training matrix was established by the management. A formal training programmed on all aspects of MSPO requirement has been established and implemented. The training program for 2020/2021 includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to workers.</p> <p>d) The estates provide PPE to the employees relevant to the work handled by the workers. The list of PPE that were provided by the estates are as below:</p>	

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<p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>i. Harvester- Safety Helmet, Sickle Cover, Hand Glove, Wellington Boots</p> <p>ii. Sprayers- Respirator, Nitrile Glove (Chemical Resistant), Goggles, Wellington Boots, Apron.</p> <p>iii. Manuring- Apron, Wellington Boots, Dust Mask</p> <p>Last given record on January 2021 for Harvester and Sprayer. Refer PPE book of GTBE, GSGE and GTME (Borang Penerimaan Dan Penggantian PPE)</p> <p>e) SOP for chemical management SMP-GPB-28 (Rev 04), Dated July 2018) was established. Register of Chemical was sighted to include the entire chemical used in the estate. Sighted evidence of chemical register for samples unit has been updated on January 2021.</p> <p>f) Sighted evidence of JKKP visit in the JKKP Book. GSGE las visit recorded on 2/9/2020. At all the visited estate, there were OSH Coordinators who were responsible for organizing safety training, meetings and investigation and reporting of accidents and Incidents. SHC Organization – Chairman: Estate Manager, SHC secretary: OSH coordinator. Sample checking on appointment letter:</p> <p>GTBE: Mr Amran Bin Sadat dated 1/1/2021</p> <p>GSGE: Mr Karthikgayen A/L Nadarajah dated 01/01/2018</p> <p>GTME: Mr Ahmad Firdaus Yahya dated 08/03/2020</p> <p>g) Records were available confirming that quarterly OSH meetings had been held at sampled estates:</p> <p>GTBE OSH Meeting 2020</p> <p>1<sup>st</sup> meeting: 13/02/2020</p>	

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	<p>2<sup>nd</sup> Meeting: Cancelled due to Covid-19            3<sup>rd</sup> Meeting: 18/09/2020            4<sup>th</sup> Meeting: 24/12/2020            GSGE OSH Meeting 2020            1<sup>st</sup> meeting: 12/03/2020            2<sup>nd</sup> Meeting: 17/06/2020            3<sup>rd</sup> Meeting: 23/09/2020            4<sup>th</sup> Meeting: 18/12/2020            GTME OSH Meeting 2020            1<sup>st</sup> meeting: 05/02/2020            2<sup>nd</sup> Meeting: 19/06/2020            3<sup>rd</sup> Meeting: 10/09/2020            4<sup>th</sup> Meeting: 18/12/2020</p> <p>Related to frequency of Osh Meeting refer Part IV Section 21 OSHA Regulation 1996, management should consider other method or platform to conduct OSH committee meeting during new norm of Covid-19.</p> <p>h) The Estates has site specific Plans in the OSH Manual (OM-GPB-04, Rev:0, Dated 1/1/10) including ERP for accident, ERP for Fire, ERP for chemical spillage, maps showing assembly areas and up to date lists of emergency contacts with training conducted to communicate the Plan. Latest fire drill was conducted:            GTBE: 7/10/2020            GSGE: 16/10/2020            GTME: 10/02/2021</p>	

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	<p>i) First Aid Kits were given to the head of gang for each activity (e.g.: harvesting, spraying, manuring) and inspection confirmed these had been appropriately stocked as per verification through interview. First Aider has been train by Cert Academy dated 24/04/2018. First aid training records as follows were verified:</p> <p>GTBE – 08/09/2020 by Mr Ahmad Aris (Hospital assistant) attended by all KKP representative.</p> <p>GSGE – 20/03/2019 by En Thegaraju Singgarappan (Hospital Assistant) attended by all KKP representative.</p> <p>GTME – 16/02/2020 by Mr Pentaya a/l Appanan (Hospital Assistant) attended by Mandore and First Aid Box Holder</p> <p>Since management has cease Paraquat usage as per SMP-GPB-28 dated September 2020 Rev 05, management could update their First Aid Box guideline and remove any unnecessary medicine (Fuller Earth) in the First Aid Box.</p> <p>j) JKPP 8 record available:</p> <p>GTBE: JKPP 8/71928/2020 submitted on 12/01/2021. JKPP 6 report available dated 20/05/2020 and 03/01/2020.</p> <p>GSGE: JKPP 8/67108/2021 submitted on 05/01/2021. JKPP 6 report available dated 09/01/2020.</p> <p>GTME: JKPP 8/82416/2020 submitted on 28/01/2021. JKPP 6 report available dated 17/11/2020.</p> <p>Accident has been reviewed quarterly during OSH meeting. Sighted evidence in the OSH Minutes of Meeting for GTBE, GSGE and GTME.</p>	
<p><b>Criterion 4.4.5:</b> Employment conditions</p>		

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4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>The estates has established Social Policy signed by the President and Chief Operating Officer dated 14/09/2020. In the policy stated the company commitment to ensure that the workers and employees are treated fairly, equally, with respect according to local, national and ratified international law.</p> <p>The policy were communicated to all the employee and stakeholders through briefing, training, and meeting and displayed at notice boards in the operating units.</p>	Complied
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p><b>- Major compliance -</b></p>	<p>The estates has established Social Policy signed by the President and Chief Operating Officer dated 14/09/2020. In the policy stated the company commitment to not discriminate in term 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>The policy were communicated to all the employee and stakeholders through briefing, training, and meeting and displayed at notice boards in the operating units.</p>	Complied
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has established the template for employment agreement for all workers entitled "Perjanjian Pekerjaan". Refer template no. HRAD WM, rev.4 dated 07/01/2019.</p> <p>All the terms and conditions stated in the employment agreement were as per Labour Act 1955, latest MAPA/NUPW Agreement and Minimum Wage Order 2020 (amendment).</p>	Complied
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p>	<p>All contractors workers salary payments were monitored and paid by the estates to ensure the contractors workers were paid based on legal or industry minimum standards</p> <p>Reviewed the payslips for contract workers as follows:</p>	Complied

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	- <b>Minor compliance</b> -	GTBE (August, September and October 2020) <table border="1" style="width: 100%;"> <tr><td>Employment No.</td></tr> <tr><td>C 00469</td></tr> <tr><td>C 00463</td></tr> <tr><td>C 00462</td></tr> </table> GSGE (August, September and October 2020) <table border="1" style="width: 100%;"> <tr><td>Employment No.</td></tr> <tr><td>C 00010</td></tr> <tr><td>C 00072</td></tr> <tr><td>C 00253</td></tr> </table> GTME (February, May and October 2020) <table border="1" style="width: 100%;"> <tr><td>Employment No.</td></tr> <tr><td>S 01442</td></tr> <tr><td>S 01383</td></tr> <tr><td>AR 02814 T</td></tr> </table>	Employment No.	C 00469	C 00463	C 00462	Employment No.	C 00010	C 00072	C 00253	Employment No.	S 01442	S 01383	AR 02814 T	
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<b>4.4.5.5</b>	The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. <b>- Major compliance -</b>	The estates has established workers master list including the contractor workers. The list includes information on the workers name, gender, nationality, identification (passport, permit and Malaysian identify card), age, date of birth date joined, category of work and work description.	Complied												
<b>4.4.5.6</b>	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records. <b>- Major compliance -</b>	Genting Plantations Berhad has established the template for employment agreement for all workers entitled "Perjanjian Pekerjaan". Refer template no. HRAD WM, rev.4 dated 07/01/2019.	Complied												

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	<p>All the terms and conditions stated in the employment agreement were as per Labour Act 1955, latest MAPA/NUPW Agreement and Minimum Wage Order 2020 (amendment).</p> <p>Reviewed the sampled employment contract for employee as follows:</p> <p><u>GTBE</u></p> <table border="1" data-bbox="1050 616 1319 850"> <tr><td>Employment No.</td></tr> <tr><td>02789</td></tr> <tr><td>02927</td></tr> <tr><td>02779</td></tr> <tr><td>02771</td></tr> <tr><td>03522</td></tr> <tr><td>00463</td></tr> </table> <p><u>GSGE</u></p> <table border="1" data-bbox="1050 900 1319 1102"> <tr><td>Employment No.</td></tr> <tr><td>03335</td></tr> <tr><td>03865</td></tr> <tr><td>03612</td></tr> <tr><td>03286</td></tr> <tr><td>03861</td></tr> </table> <p><u>GTME</u></p> <table border="1" data-bbox="1050 1152 1319 1386"> <tr><td>Employment No.</td></tr> <tr><td>02529</td></tr> <tr><td>03161</td></tr> <tr><td>03027</td></tr> <tr><td>03142</td></tr> <tr><td>02886</td></tr> <tr><td>00098</td></tr> </table>	Employment No.	02789	02927	02779	02771	03522	00463	Employment No.	03335	03865	03612	03286	03861	Employment No.	02529	03161	03027	03142	02886	00098	
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	The contract were also been brief to all the workers in their own mother language to ensure the understanding.																
<p><b>4.4.5.7</b> The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.  <b>- Major compliance -</b></p>	<p>The estates sampled implement the checkroll system to records the working hours for all workers. The data from checkroll were transferred to Lyntramax computer system for salary calculation. Verified the working hours and overtime data in checkroll, Lyntramax and payslips found all the data were consistent. Reviewed the data for employee as follows:</p> <p>GTBE (August, September and October 2020)</p> <table border="1" data-bbox="1050 767 1319 1005"> <tr><td>Employment No.</td></tr> <tr><td>02789</td></tr> <tr><td>02927</td></tr> <tr><td>02779</td></tr> <tr><td>02771</td></tr> <tr><td>03522</td></tr> <tr><td>00463</td></tr> </table> <p>GSGE (August, September and October 2020)</p> <table border="1" data-bbox="1050 1053 1319 1257"> <tr><td>Employment No.</td></tr> <tr><td>03335</td></tr> <tr><td>03865</td></tr> <tr><td>03612</td></tr> <tr><td>03286</td></tr> <tr><td>03861</td></tr> </table> <p>GTME (February, May and October 2020)</p> <table border="1" data-bbox="1050 1305 1319 1367"> <tr><td>Employment No.</td></tr> <tr><td>02529</td></tr> </table>	Employment No.	02789	02927	02779	02771	03522	00463	Employment No.	03335	03865	03612	03286	03861	Employment No.	02529	<p>Complied</p>
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<b>4.4.5.8</b>	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p> <p><b>- Major compliance -</b></p>	<p>Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours as labour law.</p> <p>As at current status, there was none has crossed approved hours of overtime. Verified the pays lips, the payment and calculation of overtime well distributed.</p> <p>The overtime rate after 8 hours daily rated is: General Workers</p> <ul style="list-style-type: none"> <li>• Mon - Sat – daily rated / 8 hours x 1.5</li> <li>• Sunday - daily rated / 8 hours x 2.0</li> <li>• Public holiday – daily rated / 8 hours x 3.0</li> </ul> <p>The overtime rate after 8 hours piece rated is: Harvester</p> <ul style="list-style-type: none"> <li>• Mon - Sat – flat rate</li> <li>• Sunday – flat rate x 2.0</li> </ul> <p>Public holiday – flat rate x 3.0</p> <p>The estates sampled implement the checkroll system to records the working hours for all workers. The data from checkroll were transferred to Lyntramax computer system for salary calculation.</p> <p>Verified the working hours and overtime data in checkroll, Lyntramax and payslips found all the data were consistent. Reviewed the data for employee as follows:</p> <p>GTBE (August, September and October 2020)</p>	Complied					

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<b>4.4.5.9</b>	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p><b>- Major compliance -</b></p>	<p>Reviewed employees payslips confirmed that the employees were paid as per stipulated Minimum Wages Order (Amendment) 2020. Reviewed payslips as follows:</p> <p>GTBE (August, September and October 2020)</p> <table border="1"> <tr><td>Employment No.</td></tr> </table>	Employment No.	Complied																			
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<b>4.4.5.10</b>	<p>Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.</p> <p><b>- Minor compliance -</b></p>	<p>The management provided free medical facilities to all the workers and dependents. The company also subsidized water and electricity to certain units.</p>	Complied																			

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<p><b>4.4.5.11</b> In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p><b>- Major compliance -</b></p>	<p>Living quarters are provided to all workers but some local workers choose to stay outside as mill is close to housing and township. Houses are equipped with 2 bedroom and a bathroom. Utilities i.e. water and electricity is provided free. Rubbish is collected alternate days.</p>	<p>Complied</p>
<p><b>4.4.5.12</b> The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has established Social Policy signed by the President and Chief Operating Officer dated 14/09/2020. In the policy stated that the company prohibited any physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal use or other form of intimidation.</p> <p>Genting Plantations Berhad has also established the Sexual Harassment Policy signed by the Chief Operating officer dated 03/08/2009. In the policy started the commitment of the company to strive for harassment-free environment.</p> <p>The policy were communicated to all the employee and stakeholders through briefing, training, and meeting and displayed at notice boards in the operating units.</p>	<p>Complied</p>
<p><b>4.4.5.13</b> The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has established Social Policy signed by the President and Chief Operating Officer dated 14/09/2020. In the policy stated that the company respect the workers right to join or form legal trade union of their own choosing and to bargain collectively.</p> <p>The policy were communicated to all the employee and stakeholders through briefing, training, and meeting and displayed at notice boards in the operating units.</p>	<p>Complied</p>

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<b>4.4.5.14</b>	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not be exposed to hazardous working conditions.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has established Social Policy signed by the President and Chief Operating Officer dated 14/09/2020. In the policy stated that the company shall not use any child labour. The children's right is respected. The policy were communicated to all the employee and stakeholders through briefing, training, and meeting and displayed at notice boards in the operating units.</p> <p>Reviewed and verified with the employee master list, no employee under age of 18 were employed. Workers are aware of the minimum age policy is being strictly enforced by the management at which the age limit is above 18 years old.</p>	Complied
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p><b>- Major compliance -</b></p>	<p>All employees and contractors are appropriately trained. Training matrix and training programme for 2020/21 was established by the estates' management. Evidence of adequate and appropriate training on safe working practices provided to workers was sighted. Verified sample of training conducted.</p> <p><u>GTBE</u></p> <ol style="list-style-type: none"> <li>1. Policy Briefing on 6/01/2021</li> <li>2. SOP Training on Diesel Handling dated 3/12/2020</li> <li>3. Training on Covid-19 SOP 9/02/2021</li> </ol> <p><u>GSGE</u></p> <ol style="list-style-type: none"> <li>1. Chemical Labelling Training dated 22/12/2020</li> <li>2. Briefing on Safety Spraying training dated 07/12/2020</li> <li>3. Covid-19 SOP Training dated 17/11/2020</li> </ol> <p><u>GTME</u></p>	Complied

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		1. Training on Manuring and Fertilizer Handling dated 11/08/2020 2. IPM Training on 11/02/2020 3. Training on HCV and Riparian Buffer Zone dated 11/08/2020	
<b>4.4.6.2</b>	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. <b>- Major compliance -</b>	Similar method for identifying the training needs are used in all the visited estates and mill. The training needs for the estates for the FY 2020/2021 training program has been established. The details of the training needs include categories of job descriptions, sections, and employees' group. Among the subjects covered were those related to environment, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training, field activities, equipment handling, vehicles maintenance etc.	Complied
<b>4.4.6.3</b>	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure. <b>- Minor compliance -</b>	The training program for 2020/2021 includes training for all categories of workers and contractors. Training program are made on annual basis. In addition, it is subject to review during the financial year should need arises.	Complied
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
<b>4.5.1.1</b>	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. <b>- Major compliance -</b>	Environmental Policy was established, signed by President and Chief Operating Officer on 05/10/2009. Communication of the policy was delivered in various methods such as display at strategic places, briefing during muster and trainings.	Complied
<b>4.5.1.2</b>	The environmental management plan shall cover the following: a) An environmental policy and objectives;	Environmental management plan was established at all sampled estates which include environmental policy, aspect impact, protection	Complied

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<p>b) The aspects and impacts analysis of all operations.  <b>- Major compliance -</b></p>	<p>of HCV areas, Soil erosion, air pollution, water pollution, noise pollution, Soil Pollution, GHG, waste management, water usage, etc. Environmental objectives were established through the management plan, e.g. no open burning, improve efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage, and reduce wastage for water consumption etc. This management plan has been reviewed on:            GTBE: 05/01/2021            GSGE: 09/01/2021            GTME: 11/01/2021</p> <p>Environmental aspect impact assessment was established to include all the activities, e.g. spraying, manuring, harvesting, pruning, EFB application, chemical store activity, internal transport, upkeep &amp; maintenance work, workshop, line site, water catchment pond, HCV, chemical mixing bay, landfill, nursery and etc. This environmental aspect impact already been review on:            GTBE: 06/01/2021            GSGE: 11/01/2021            GTME: 10/01/2021</p>	
<p><b>4.5.1.3</b> An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.  <b>- Major compliance -</b></p>	<p>Environmental management plan was established at all the visited estates which include environmental policy, aspect impact, protection of HCV areas, air pollution, water pollution, noise pollution, GHG, waste management, water usage etc. Environmental objectives were established through the management plan, e.g. no open burning, improve efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage, and reduce wastage for water consumption etc. This management plan was monitored on monthly</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		basis and mitigate the negative impacts to promote the positive impact.	
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. <b>- Minor compliance -</b>	Environmental management plan was established at all the visited estates which include environmental policy, aspect impact, protection of HCV areas, air pollution, water pollution, noise pollution, GHG, waste management, water usage etc. Environmental objectives were established through the management plan, e.g. no open burning, improve efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage, and reduce wastage for water consumption etc. This management plan was monitored on monthly basis. Awareness training has been conducted regularly at GTBE, GSGE and GTME.	Complied
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. <b>- Major compliance -</b>	Awareness and training programmed related to environment management and policy was implemented through various methods such as trainings, meetings and briefing during muster call. The implementation record was available as per below: - 1. GTBE – Training on Prohibited Spraying Activities at Riparian Buffer Zone dated 19/01/2021 2. GSGE – Training on Prohibited Spraying Activities at Riparian Buffer Zone dated 17/09/2021 3. GTME - Training on HCV and Riparian Buffer Zone dated 11/08/2020. Domestic waste and recycle training dated 20/01/2020.	Complied
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. <b>- Major compliance -</b>	Environmental meeting has been conducted. Apart from that concerns about environmental quality can also be channeled by the workers to the management during muster call. Sighted evidence minutes of Meeting:	Complied

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		GTBE: 16/09/2020 GSGE: 14/02/2020 GTME: 20/03/2020													
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>															
<b>4.5.2.1</b>	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. <b>- Major compliance -</b>	Monthly record on energy consumption for both renewable and nonrenewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. The plan for reduce on Diesel consumption was available dated January 2021. Their specific concern more to Diesel usage, GHG emission, infield and internal transport and Diesel usage per tan FFB.	Complied												
<b>4.5.2.2</b>	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. <b>- Major compliance -</b>	The estimation of direct usage of non-renewable energy (diesel & petrol) for operations to determine energy efficiency of their operations inclusive of fuel use by contractors (transport & machinery) was available in the estate annual budgets. Sampling data estate as per below: - <table border="1" data-bbox="1048 1045 1870 1181"> <thead> <tr> <th>Year / estate</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td>GTBE</td> <td>3.07</td> <td>3.32</td> </tr> <tr> <td>GSGE</td> <td>1.22</td> <td>1.65</td> </tr> <tr> <td>GTME</td> <td>2.75</td> <td>2.47</td> </tr> </tbody> </table>	Year / estate	2019	2020	GTBE	3.07	3.32	GSGE	1.22	1.65	GTME	2.75	2.47	Complied
Year / estate	2019	2020													
GTBE	3.07	3.32													
GSGE	1.22	1.65													
GTME	2.75	2.47													
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible. <b>- Minor compliance -</b>	Currently there was no opportunity to use renewable energy at all the sampled estate. However, during interview found estate has usage some solar lighting at certain place.	Complied												
<b>Criterion 4.5.3: Waste management and disposal</b>															

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4.5.3.1	All waste products and sources of pollution shall be identified and documented. <b>- Major compliance -</b>	Identification, segregation and storage of waste was established where source of wastes at workshop, line site, office, diesel tank, chemical store, fertilizer store, empty fertilizer bag store, empty container store, petrol/lubricant store, scheduled waste store, general store, mist blower store, premix area, clinic, shops, religious area, landfill area, recyclable waste store, vehicle garage and nursery were included.	Complied
4.5.3.2	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products <b>- Major compliance -</b>	Waste management plan was established by the estates to include pollution source, mitigation plan and monitoring e.g. source of waste and mitigation plan at workshop, line site, office, diesel tank, chemical store, fertilizer store, empty fertilizer bag store, empty container store, petrol/lubricant store, scheduled waste store, general store, mist blower store, premix area, clinic, shops, religious area, landfill area, recycle waste store, vehicle garage and nursery.	Complied
4.5.3.3	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. <b>- Major compliance -</b>	The procedure was established (Scheduled waste Management, SMPGPB- 11, Rev 01, Dated 11/06/2018). Scheduled wastes were sent to authorized collectors such as Southern Strength (M) Sdn Bhd. Latest E-Swiss report sighted: GTBE: ASMK(B)11/123/000/005 dated 10/12/2020 GSGE: AS(B)J11/123/000/078 dated 16/02/2021 GTME: AS(B)J11/123/000/062 dated 30/01/2021 Verification of 5 <sup>th</sup> Schedule records showed that SW were not kept more than 180 days. Sighted evidence of sample latest disposal report: GTBE: 2021020918KSEDS – SW410 dated 09/02/2021 GSGE: 20210106WFUSRE – SW406 dated 07/01/2021	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		GTME: 2021011316B8N3AK – SW 305 dated 13/01/2021	
<b>4.5.3.4</b>	Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer’s labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers. <b>- Major compliance -</b>	Empty pesticide containers were triple rinsed and punctured before sent to authorized collector such as G-Planter. The record was available for storage purpose refer Stock/bin card. Receipt of deliveries were available at the estates for verification. Sampling latest record: GTBE: Miracle bottle 500 ml, 4 litter containers dated 11/01/2021 GSGE: 300 units 20 litter container dated 25/01/2021 GTME: 300 units 20 litter container dated 30/01/2021	Complied
<b>4.5.3.5</b>	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. <b>- Minor compliance -</b>	The Domestic was disposed properly by management. Sighted schedule of waste collection 3 times a week. Refer Domestic Waste Collection Book. GTBE, GSGE and GTME. Sighted evidence of photo of landfill and date open/close record.	Complied
<b>Criterion 4.5.4: Reduction of pollution and emission</b>			
<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	Sighted evidence of Pollution source Map of GTBE, GSGE and GTME. Environmental management plan was established at all the visited estates which include environmental policy, aspect impact, protection of HCV areas, air pollution, water pollution, noise pollution, GHG, waste management, water usage etc. Environmental objectives were established through the management plan, e.g. no open burning, improve efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage, and reduce wastage for water consumption etc. This management plan was monitored on monthly basis.	Complied
<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented.	An action plan to reduce identified pollutants was established under name Environmental management plan. Environmental management	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	plan was established at all the visited estates which include environmental policy, aspect impact, protection of HCV areas, air pollution, water pollution, noise pollution, GHG, waste management, water usage etc. Environmental objectives were established through the management plan, e.g. no open burning, improve efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage, and reduce wastage for water consumption etc. This management plan was monitored on monthly basis.	
<b>Criterion 4.5.5:</b> Natural water resources			
<b>4.5.5.1</b>	<p>The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> <li>a. Assessment of water usage and sources of supply.</li> <li>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities.</li> <li>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> <li>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</li> </ul>	<p>The management already establish the water management plan to maintain the quality of natural water resources. This include:</p> <ul style="list-style-type: none"> <li>a. Water management plan was established at all the visited estates which included water pollution, water quality, drainage system, flood/waterlog, assessment of water usage, drought season with latest review made on Jan 2020. The plan emphasized on the following areas. <ul style="list-style-type: none"> <li>a) Water source GTBE: SAMB GSGE: SAJ GTME: SAJ</li> <li>b) Efficient use of water</li> <li>c) Renewability of water source</li> <li>d) Avoidance of surface and ground water contamination</li> </ul> </li> <li>b. Water analysis record was available. The result was complied with NWQS standard. Latest record sighted on:</li> </ul>	Complied

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	<p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p><b>- Major compliance -</b></p>	<p>GTBE: 29/12/2020            GSGE: 28/11/2020            GTME: 27/05/2020</p> <p>c. To optimize water, management using roadside pit in field to contain the water for keep soil moisture and also use rainwater harvesting for used in daily activity such as cleaning, chemical mixture and tractor washing</p> <p>d. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones as commonly practiced within the industry.</p> <p>e. Verified that management has maintained their riparian buffer zone, install signing on prohibiting illegal activities and give awareness training to workers.</p> <p>f. No bore well in any estate been sampling for this audit.</p>	
<b>4.5.5.2</b>	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p><b>- Minor compliance -</b></p>	<p>Verified through interview, there is no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p>	Complied
<b>4.5.5.3</b>	<p>Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).</p> <p><b>- Minor compliance -</b></p>	<p>The management was practicing the water harvesting practices such as water from road-side drains can be directed and stored in conservation terraces and various natural receptacles.</p>	Complied
<b>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</b>			
<b>4.5.6.1</b>	<p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p>	<p>The assessment namely, "Inventory on HCV sites within Genting Plantations Berhad group estates (Central and Southern Region)" by a consultant in Feb- Mar 2010. Only HCV 1.4, HCV 4.2 and HCV 6 were</p>	Complied

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<p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</p> <p><b>- Major compliance -</b></p>	<p>identified at GTBE, GSGE and GTME. E.g.: steep area, rocky area, temple, and cemetery. No changes and same as per previous assessment.</p>	
<p><b>4.5.6.2</b> If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p><b>- Major compliance -</b></p>	<p>In all estate, as per HCV assessment no rare, threatened, or endangered species in estate however only HCV 1.4, HCV 4.2 and HCV 6 were identified at GTBE, GSGE and GTME. E.g.: steep area, rocky area, temple, and cemetery. The management already have a appropriate measures for management planning according to Biodiversity action plan 2020/21. Sighted evidence of HCV monitoring plan for the month of December 2020.</p> <p>For awareness to stakeholder regarding to HCV and endangered, rare and threaten species was conducted during stakeholder meeting latest record.</p> <p>Management has conducted virtual training with Sustainability Department on 18/12/2020.</p>	<p>Complied</p>
<p><b>4.5.6.3</b> A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p><b>- Major compliance -</b></p>	<p>Monitoring was done for HCV area. Sighted evidence of monitoring checklist:</p> <p>GTBE: 09/12/2020 GSGE: 02/12/2020 GTME: 08/02/2021</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance																								
<b>Criterion 4.5.7: Zero burning practices</b>																											
<b>4.5.7.1</b>	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. <b>- Major compliance -</b>	There was no trace of fire used for waste disposal and for preparing land for oil palm cultivation or replanting observed at all sampled estates by verification through interview. The management already prepared the replanting programmed as per below:- <table border="1"> <thead> <tr> <th>Year</th> <th>GTBE (Ha)</th> <th>GSGE(Ha)</th> <th>GTME(Ha)</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>165.05</td> <td>136.18</td> <td>43.39</td> </tr> <tr> <td>2022</td> <td>194.31</td> <td>135.20</td> <td>91.89</td> </tr> <tr> <td>2023</td> <td>192.24</td> <td>110.04</td> <td>45.97</td> </tr> <tr> <td>2024</td> <td>92.37</td> <td>80.34</td> <td>124.09</td> </tr> <tr> <td>2025</td> <td>140.41</td> <td>0</td> <td>126.67</td> </tr> </tbody> </table>	Year	GTBE (Ha)	GSGE(Ha)	GTME(Ha)	2021	165.05	136.18	43.39	2022	194.31	135.20	91.89	2023	192.24	110.04	45.97	2024	92.37	80.34	124.09	2025	140.41	0	126.67	Complied
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<b>4.5.7.2</b>	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. <b>- Major compliance -</b>	Not applicable as fire was not used for any field operations.	N/A																								
<b>4.5.7.3</b>	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. <b>- Major compliance -</b>	Not applicable as fire was not used for any field operations.	N/A																								
<b>4.5.7.4</b>	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. <b>- Minor compliance -</b>	Based on interview for the replanting areas, previous crops were observed to be felled, chipped, and windrowed. No trace of burning observed.	Complied																								

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<b>4.6 Principle 6: Best Practices</b>																																							
<b>Criterion 4.6.1: Site Management</b>																																							
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. <b>- Major compliance -</b>	Genting Plantations Berhad has well established GENP's Oil Palm Manual for monitoring and control of best practice implementation at the estates. There were 13 manuals which cover the operation from land clearing to harvesting and evacuation.	Complied																																				
<b>4.6.1.2</b>	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. <b>- Major compliance -</b>	Genting Plantations Berhad has developed Steep Land Management Procedure with Doc. No. SMP-GPB-10, Rev. 0 and Soil Conservation and Terracing SOP with Doc. No. OPM 4, Rev. June 2013. Seen the Slope map with GIS data for Estate as below; <table border="1" data-bbox="1048 850 1870 1390"> <thead> <tr> <th>Estate</th> <th>Slope/degree</th> <th>Percentage area</th> </tr> </thead> <tbody> <tr> <td rowspan="5">GTBE</td> <td>0'-6'</td> <td>76.79</td> </tr> <tr> <td>6'-10'</td> <td>15.49</td> </tr> <tr> <td>10'-15'</td> <td>5.74</td> </tr> <tr> <td>15'-20'</td> <td>1.61</td> </tr> <tr> <td>20'-25'</td> <td>0.03</td> </tr> <tr> <td rowspan="5">GSGE</td> <td>0'-6'</td> <td>43.74</td> </tr> <tr> <td>6'-10'</td> <td>51.22</td> </tr> <tr> <td>10'-15'</td> <td>4.86</td> </tr> <tr> <td>15'-20'</td> <td>0.09</td> </tr> <tr> <td>20'-25'</td> <td>0.08</td> </tr> <tr> <td rowspan="5">GTME</td> <td>0'-6'</td> <td>48.36</td> </tr> <tr> <td>6'-10'</td> <td>43.17</td> </tr> <tr> <td>10'-15'</td> <td>5.44</td> </tr> <tr> <td>15'-20'</td> <td>2.21</td> </tr> <tr> <td>20'-25'</td> <td>0.51</td> </tr> </tbody> </table>	Estate	Slope/degree	Percentage area	GTBE	0'-6'	76.79	6'-10'	15.49	10'-15'	5.74	15'-20'	1.61	20'-25'	0.03	GSGE	0'-6'	43.74	6'-10'	51.22	10'-15'	4.86	15'-20'	0.09	20'-25'	0.08	GTME	0'-6'	48.36	6'-10'	43.17	10'-15'	5.44	15'-20'	2.21	20'-25'	0.51	Complied
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Criterion / Indicator		Assessment Findings	Compliance																								
<b>4.6.1.3</b>	A visual identification or reference system shall be established for each field. - <b>Major compliance</b> -	All fields are marked and identified. Information like year planting (field no) and the total hectare is shown in all markers. It has been verified through interview and photos.	Complied																								
<b>Criterion 4.6.2: Economic and financial viability plan</b>																											
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - <b>Major compliance</b> -	Business plan was available for all estate been visit, under capex. Sighted evidence of 5 years business plan for GTBE, GSGE and GTME.	Complied																								
<b>4.6.2.2</b>	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - <b>Major compliance</b> -	Replanting programmes were available at all the visited estates The programmes projected for 5 years. All replanting program and planning in all the Group Estates are monitored by the Head Office. Assistance and visits are performed by SVP/GM for the approval of hectares and stand per ha. <table border="1" data-bbox="1048 948 1659 1150"> <thead> <tr> <th>Year</th> <th>GTBE (Ha)</th> <th>GSGE(Ha)</th> <th>GTME(Ha)</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>165.05</td> <td>136.18</td> <td>43.39</td> </tr> <tr> <td>2022</td> <td>194.31</td> <td>135.20</td> <td>91.89</td> </tr> <tr> <td>2023</td> <td>192.24</td> <td>110.04</td> <td>45.97</td> </tr> <tr> <td>2024</td> <td>92.37</td> <td>80.34</td> <td>124.09</td> </tr> <tr> <td>2025</td> <td>140.41</td> <td>0</td> <td>126.67</td> </tr> </tbody> </table>	Year	GTBE (Ha)	GSGE(Ha)	GTME(Ha)	2021	165.05	136.18	43.39	2022	194.31	135.20	91.89	2023	192.24	110.04	45.97	2024	92.37	80.34	124.09	2025	140.41	0	126.67	Complied
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<b>4.6.2.3</b>	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production : cost per tonne of FFB d) Price forecast	The business and management plan for all the visited estates were available in annual budget with 5 years projection. Among the information available in the budget were crop projection and operation cost. The details consist of: 1. Year of Planting, Planting material 2. Crop forecast, budget and actual FFB	Complied																								

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	e) Financial indicators : cost benefit, discounted cash flow, return on investment <b>- Major compliance -</b>	3. Cost of production 4. Balance sheet	
<b>4.6.2.4</b>	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. <b>- Major compliance -</b>	The management will have meetings from time to time to monitor the work progress against annual programme to ensure the budget is not overrun. Sighted monthly progress report as evidence on monitoring cash flow and estate performance. Refer Monthly Report January 2021 for GTBE, GSGE and GTME named Monthly Summary Of Estate Performance For Year 2021, Month 1.	Complied
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. <b>- Major compliance -</b>	The pricing mechanism was conducted as per contract agreement between the estates and contractors appointed. Stated in the agreement under section The Schedule. Reviewed sampled contract between: 1. Genting Tebong Estate with Arumugam A/L Adekan 2. Genting Tebong Estate with ASK Ashok Enterprise 3. Genting Sri Gading Estate with Sonn Tractor Construction 4. Genting Sri Gading Estate with Hiap Soon Trading Co. 5. Genting Tanah Merah Estate with VJK Maju Enterprise.	Complied
<b>4.6.3.2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	Based on sample agreements sighted and the interview with contractor, the contractual agreements confirmed to be understand by all parties and fair, legal as well as transparent. Reviewed the sampled payment made as per contract agreement as follows: Lau Lam Piaw for invoice no. GSGEV100013072 – ‘00000219’	Complied

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<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. <b>- Major compliance -</b>	The contractors were made to understand the MSPO requirements and shall provide the required documentation and information through meetings and trainings. Records of attendance of the meetings were available for verification.  All contractors to be appointed by the mill must understand and complied with the MSPO requirement as stated in the tender document under section 8.2 Clause for RSPO and MSPO and Sustainability Requirement Clause.  Reviewed sampled contract between: 1. Genting Tebong Estate with Arumugam A/L Adekan 2. Genting Tebong Estate with ASK Ashok Enterprise 3. Genting Sri Gading Estate with Sonn Tractor Construction 4. Genting Sri Gading Estate with Hiap Soon Trading Co. 5. Genting Tanah Merah Estate with VJK Maju Enterprise.	Complied
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	All terms and condition stated in the contracts were agreed between both estates and contractors as per reviewed sampled contract between: 1. Genting Tebong Estate with Arumugam A/L Adekan 2. Genting Tebong Estate with ASK Ashok Enterprise 3. Genting Sri Gading Estate with Sonn Tractor Construction 4. Genting Sri Gading Estate with Hiap Soon Trading Co. 5. Genting Tanah Merah Estate with VJK Maju Enterprise.	Complied

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4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - <b>Minor compliance</b> -	All mill under Genting Plantation has no objection to allow BSI auditors to verify the assessment through physical inspection if required.	Complied
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - <b>Major compliance</b> -	The estate has monitored and records the contractors works through Scheduled of Work Completed (SOWC) which been acknowledge between the estates and contractors before payment been made. Reviewed the SOWC as follows: 1. GSGE/D1/G2101001 2. GSGE/D3/G2101003 3. GSGE/D2/H2101001	Complied
<b>4.7 Principle 7: Development of new planting</b>			
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - <b>Major compliance</b> -	There is no development of new planting at sampled estates.	N/A
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - <b>Major compliance</b> -	There is no development of new planting at sampled estates.	N/A
<b>Criterion 4.7.2: Peat Land</b>			

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4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - <b>Major compliance</b> -	There is no development of new planting at sampled estates.	N/A
<b>Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)</b>			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - <b>Major compliance</b> -	There is no development of new planting at sampled estates.	N/A
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - <b>Major compliance</b> -	There is no development of new planting at sampled estates.	N/A
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - <b>Major compliance</b> -	There is no development of new planting at sampled estates.	N/A
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - <b>Minor compliance</b> -	There is no development of new planting at sampled estates.	N/A

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<b>Criterion 4.7.4:</b> Soil and topographic information			
<b>4.7.4.1</b>	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - <b>Major compliance</b> -	There is no development of new planting at sampled estates.	N/A
<b>4.7.4.2</b>	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - <b>Major compliance</b> -	There is no development of new planting at sampled estates.	N/A
<b>Criterion 4.7.5:</b> Planting on steep terrain, marginal and fragile soils			
<b>4.7.5.1</b>	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - <b>Major compliance</b> -	There is no development of new planting at sampled estates.	N/A
<b>4.7.5.2</b>	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - <b>Major compliance</b> -	There is no development of new planting at sampled estates.	N/A
<b>4.7.5.3</b>	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - <b>Major compliance</b> -	There is no development of new planting at sampled estates.	N/A
<b>Criterion 4.7.6:</b> Customary land			

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<b>4.7.6.1</b>	No new plantings are established on recognised customary land without the owners’ free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. <b>- Major compliance -</b>	There is no development of new planting at sampled estates.	N/A
<b>4.7.6.2</b>	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. <b>- Minor compliance -</b>	There is no development of new planting at sampled estates.	N/A
<b>4.7.6.3</b>	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. <b>- Major compliance -</b>	There is no development of new planting at sampled estates.	N/A
<b>4.7.6.4</b>	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. <b>- Major compliance -</b>	There is no development of new planting at sampled estates.	N/A
<b>4.7.6.5</b>	Identification and assessment of legal and recognised customary rights shall be documented. <b>- Major compliance -</b>	There is no development of new planting at sampled estates.	N/A

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.7.6.6</b>	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. <b>- Major compliance -</b>	There is no development of new planting at sampled estates.	N/A
<b>4.7.6.7</b>	The process and outcome of any compensation claims shall be documented and made publicly available. <b>- Major compliance -</b>	There is no development of new planting at sampled estates.	N/A
<b>4.7.6.8</b>	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. <b>- Minor compliance -</b>	There is no development of new planting at sampled estates.	N/A

**MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mills**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	Policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	Genting Plantations Berhad has established MSPO Policy signed by the President and Chief Operating Officer dated 18/3/2014. The policy was communicated to the employee through training, briefing and displayed on notice board at several strategic places in the operating unit.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. <b>- Major compliance -</b>	The MSPO Policy emphasis the company commitment to establish and maintain an effective sustainability management system throughout the organization and ensure compliance with MSPO and MPOB Code of Practice.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	Latest Internal Audit was conducted on 25 – 26/01/2021 by Manager – Sustainability. No non-conformity were issued during the audit.	Complied
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. <b>- Major compliance -</b>	Genting Plantations Berhad has established SOP for Sustainability Internal Audit documented in Sustainability Management Procedure Manual, Sustainability Internal Audit. Refer doc. no. SMP-GPB-03, rev. 05 dated 09/2020. The SOP covered the items includes: 1. Audit criteria	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		2. Audit Schedule and Audit Plan 3. Lead Auditor and Team Leader Responsibility 4. Closing Meeting 5. Auditee Responsibility 6. Internal Auditor responsibility 7. Operating unit manager responsibility 8. Records retention of 5 years	
<b>4.1.2.3</b>	Reports shall be made available to the management for their review. <b>- Major compliance -</b>	Internal Audit reports and Corrective Action Plan were kept for at least 5 years as per SOP established.  The internal audit result were discussed during the management review meeting.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. <b>- Major compliance -</b>	The management conducted the Management Review Meeting on annually basis. Reviewed the latest Management Review Meeting (Southern Region) dated 08/01/2021. Among the agenda discussed in the MRM were: <ol style="list-style-type: none"> <li>1. Minutes/Actions of previous meeting</li> <li>2. RSPO/MSPO Audit schedule and certification status</li> <li>3. Changes and improvement on sustainability management system</li> <li>4. Results on internal audit</li> <li>5. Complaints and grievances</li> <li>6. Enquiry register</li> <li>7. Stakeholder meeting/minutes</li> </ol>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		8. Greenhouse gas 9. Continual improvement and recommendations 10. Resource training requirements 11. Sustainability policies 12. Review of effectiveness in achieving quality, environment, social, safety and health objectives 13. Compliance to legal requirements 14. Supply chain and traceability 15. Preventive and corrective actions	
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. <b>- Major compliance -</b>	The mill has established the continuous improvement plan in consideration of environmental and social impacts. Among the sampled continuous improvement plan as follows: 1. To receive and act on any environmental complaints through internal and external communications 2. Reuse production waste for process stability 3. Supply biomass waste as fertiliser for estate/mill 4. Recycling of bunch ash as fertiliser 5. To build up and maintain good relation with stakeholder and surrounding communities via program conducted by oil mill 6. Provide free transportation to school children	Complied
<b>4.1.4.2</b>	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.	The new information and techniques to improve practices are obtained mainly through information from communications with	Complied

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	- <b>Major compliance</b> -	<p>suppliers and being members of associations related to palm oil industry.</p> <p>Any new information on new technology will be forwarded to the HQ for approval before any implementation.</p> <p>Latest technology available at the mill is Electrostatic Precipitator (ESP) installed at the boiler station to comply with Environmental Quality (Clean Air) Regulation 2014 which started commencing in October 2020.</p>	
<b>4.2 Principle 2: Transparency</b>			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
<b>4.2.1.1</b>	<p>The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.</p> <p>- <b>Major compliance</b> -</p>	<p>Genting Plantations Berhad has established SOP for consultation and communication documented in Sustainability Management Procedure Manual, Procedure for consultation and communication. Refer doc. no. SMP-GPB-17, rev. 02 dated 23/02/2018.</p> <p>The consultation and communication was conducted through stakeholder meeting, dialogs, request letter, phone call between the mill and stakeholder (internal and external).</p> <p>The consultation and communication were recorded in the enquiry register book. Reviewed the records for consultation and communication by stakeholders dated 20/02/2020, 11/07/2020, 31/07/2020 and 04/08/2020.</p>	Complied
<b>4.2.1.2</b>	<p>The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p>	<p>All documents required by this indicator are made publicly available to all stakeholders as per Memorandum signed by the Mill Manager</p>	Complied

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	- <b>Major compliance</b> -	and issued dated 01/01/2020. The stakeholder were required to fill in the Enquiry Register Book in order to access the documents. Sustainability Report and Annual Report are published annually and made publicly available at website: www.gentingplantations.com	
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication with the relevant stakeholders. - <b>Major compliance</b> -	Genting Plantations Berhad has established SOP for consultation and communication documented in Sustainability Management Procedure Manual, Procedure for consultation and communication. Refer doc. no. SMP-GPB-17, rev. 02 dated 23/02/2018. The consultation and communication was conducted through stakeholder meeting, dialogs, request letter, phone call between the mill and stakeholder (internal and external).	Complied
<b>4.2.2.2</b>	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - <b>Minor compliance</b> -	Genting Plantations Berhad has appointed the Mill Manager as person responsible for consultation and communication as per appointment letter signed by the Senior Vice President – Group Processing dated 01/09/2017. In the appointment letter stated the responsibility of the management representative person responsible for consultation and communication. Additionally, the mill management has appointed the Chief Clerk as person responsible for consultation and communication as per appointment letter signed by the Mill Manager dated 04/12/2017.	Complied
<b>4.2.2.3</b>	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - <b>Major compliance</b> -	Stakeholder list was sighted and last updated on 21/01/2021 where local communities, government authorities, internal workers, contractors and suppliers were included into the list.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Enquiry Register Book was implemented in the mill and estates. All the enquiries were recorded in the enquiry book.	
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. <b>- Major compliance -</b>	Traceability implemented based on the procedure Title: Supply Chain and Traceability (Mill); Doc. # SMP-GPB-23; Rev. 12; Issue date: November 2020.	Complied
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	Regular inspection has been conducted on daily basis as per FFB and CPO book. Every consignment must be verified by the upper level in the mill. External checking also conducted as per Internal Audit conducted by P. Sivaji Raja (Manager – Sustainability); Audit Date: 25-26/01/2021; Internal Audit Report Date: 31/01/2021 Several activities have been conducted for traceability as appendix 1: 1. Despatch CPO & PK 2. CCTAV and Security 3. Diesel charge and store item 4. Monthly stock take	Complied
<b>4.2.3.3</b>	The management shall identified and assign suitable employees to implement and maintain traceability system. <b>- Minor compliance -</b>	As per letter of Appointment as Person In-Charge for Supply Chain, Traceability and Identity Preserved (IP) Requirements of RSPO, ISCC and MSPO Sustainability Standards; Date: 4/12/2017; Appointed person: Mohd. Isa Bin Karjah, Chief Clerk GAIOM. Verified through interview found he have good understanding on traceability.	Complied

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<b>4.2.3.4</b>	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. <b>- Major compliance -</b>	Records maintained Director Daily Production Figure. Products delivery records maintained as per sample weighbridge tickets sighted as following: FFB Date: 11/03/2020 Chit Number: FFB200000328W Seller: GSRE Lorry Number: JSH6619 Weight: 16.36 MT  CPO Date: 14/07/2020 Chit Number: CPOSG200000443W Buyer: Mewaloloe Industries Sdn Bhd Lorry Number: NBM1878 Weight: 41.15 MT	Complied
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
<b>4.3.1.1</b>	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. <b>- Major compliance -</b>	Mill operations are in compliance with the applicable local, state, national and ratified international laws and regulations. Legal Requirement Register (LRR) Document No. SMP-GPB-22 (rev 06) was available for verification. Sampling the compliance of respective areas only, Genting Ayer Item POM has obtained several	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>permits from authorities and others. Sampled of the permits as below:</p> <ol style="list-style-type: none"> <li>1. DOE Licence – Menduduki Atau Menggunakan Premis Yang Ditetapkan (No: 003866) valid until 30/06/2021</li> <li>2. Weighbridge 40 MT calibration by metrology Corporation Malaysia Sdn Bhd dated 14/10/2020 (B1448132)</li> <li>3. Lesen Bagi Pepasangan Persendirian- Akta Bekalan Elektrik 1990 (No: 44051) valid until 11/06/2021</li> <li>4. Permit Barang Kawalan Berjadual (No: J001684) valid until 05/12/2021</li> <li>5. MPOB license 500056704000 valid until 31/01/2020.</li> <li>6. LEV monitoring was done by monthly latest dated was on 28/09/2020 and for Hygein Tech report was done by Maju Perkasa Sdn Bhd JKPP HQ/18/JHII/00/00013.</li> <li>7. Hearing conservation programme dated 05/01/2021, by Poliklinik Intan (RZ Intan Medicare Sdn Bhd.) By Dr Zainudin Bin Muid (HQ/08/DOC/00/468).</li> <li>8. Letter of approval by Jabatan Tenaga Kerja Semenanjung Malaysia of Permohonan Had Kerja Lebih Masa Di Bawah Seksyen 60A(4)(a) Akta Kerja 1955; Ref. # BHG.PU/9/134 Jld 13 (30); Date: 21/5/2018</li> <li>9. Permit To Purchase, Store and Use Of Sodium Hydroxide (No: 007459) dated 01/01/2021</li> </ol>	
<b>4.3.1.2</b>	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>Plantation and Sustainability Department and Manager and Asst. Manager for respective operating units will undertake the responsibility of identifying, managing, updating, and tracking the</p>	Complied

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		<p>legal requirement as well as monitoring the status of legal compliance.</p> <p>All legal requirement was documented in Register of Legal and Other Requirements (Ref doc no ML-1A/L5-AP1 pind 0) and List of Machineries Certificate of Fitness. Compliance to each applicable law and regulation is monitored by the operating units. The legal register at all sites were updated on a yearly basis / as and when needed for new updates/licenses.</p> <p>Plantation and Sustainability Department conducted Internal audit for Sustainability Certification to monitor the status of legal compliance. Latest audit was conducted on 25-26/01/2021. All issued raised during the audit has been addressed by the mill management dated 08/02/2021.</p>	
<b>4.3.1.3</b>	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p><b>- Major compliance -</b></p>	<p>Plantations and Sustainability Department, Manager and Asst. Manager for respective operating units will undertake the responsibility of identifying, managing, updating, and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p>All legal requirement was documented in Register of Legal and Other Requirements (Ref doc no ML-1A/L5-AP1 pind 0) and List of Machineries Certificate of Fitness. Compliance to each applicable law and regulation is monitored by the operating units. The legal register at all sites were updated on a yearly basis / as and when needed for new updates/licenses.</p>	Complied
<b>4.3.1.4</b>	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p>	<p>Plantations and Sustainability Department, Manager and Asst. Manager for respective operating units will undertake the responsibility of identifying, managing, updating and tracking the</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- <b>Minor compliance</b> -	<p>legal requirement as well as monitoring the status of legal compliance.</p> <p>Management has assigned Mr Mohd Isa Bin Karjah as person in charge. Refer Appointment letter as Person In Charge for Updating Changes in Laws at GAIOM dated 01/01/2020.</p> <p>Plantations and Sustainability Department conducted Internal audit for Sustainability Certification to monitor the status of legal compliance. Latest audit was conducted on 20-21 Jan 2020. All issued raised during the audit has been addressed by the mill management dated 30 Jan 2020.</p>	
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p>- <b>Major compliance</b> -</p>	<p>The mill is located in the Genting Sing Mah Estate land title under lot no. 227 and 228 with land title no. 96424</p> <p>The mill complex is 4.05 hectares and this is mapped out.</p> <p>Mill activities do not diminishing any other users’ rights as verified through interview with the smallholders and local communities.</p>	Complied
<b>4.3.2.2</b>	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.</p> <p>- <b>Major compliance</b> -</p>	<p>The mill is located in the Genting Sing Mah Estate land title under lot no. 227 and 228 with land title no. 96424</p> <p>The mill complex is 4.05 hectares and this is mapped out.</p>	Complied
<b>4.3.2.3</b>	<p>Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- <b>Major compliance</b> -</p>	<p>Legal boundary along the mill were demarcated with fences. Land title was under estate.</p>	Complied
<b>4.3.2.4</b>	<p>Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available</p>	<p>Mill is situated in the Genting Sing Mah Estate land and not diminishing any other users’ rights. There is no land dispute in the</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	and that these should have been accepted with free prior informed consent (FPIC). - <b>Minor compliance</b> -	mill compound at the time of audit verified through interviewed with the smallholders and local communities.	
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - <b>Major compliance</b> -	There is no customary land encumbrance in the mill compound at the time of audit verified through interviewed with the smallholders and local communities.	N/A
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - <b>Minor compliance</b> -	There is no customary land encumbrance in the mill compound at the time of audit verified through interviewed with the smallholders and local communities.	N/A
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - <b>Major compliance</b> -	There is no customary land encumbrance in the mill compound at the time of audit verified through interviewed with the smallholders and local communities.	N/A
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - <b>Minor compliance</b> -	Latest Social impact Assessment was conducted on 14 – 3-/12/2020 by the Sustainability Manager as per Social Impact Assessment (SIA) Report Genting Kulai Besar Estate, Genting Sungei Rayat Estate and Genting Ayer Item Oil Mill dated 29/01/2021. The mill has established Social Management and Monitoring Plan date 10/02/2021 base on the findings identified during the assessment conducted.	Complied

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Criterion / Indicator		Assessment Findings	Compliance								
<b>Criterion 4.4.2:</b> Complaints and grievances											
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented. - <b>Major compliance</b> -	Genting Plantations Berhad has established SOP for dealing with complaints and documented in Sustainability Management Procedure Manual, Complaints and Grievances. Refer doc. no. SMP-GPB-19, rev. 04 dated March 2020.	Complied								
<b>4.4.2.2</b>	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - <b>Major compliance</b> -	As per SOP established, the Mill Management shall review and take all necessary action within 1 month from receipt of the complaint or grievances. Reviewed the records of sampled complaints and grievances as follow: <table border="1" data-bbox="1075 782 1870 1045"> <thead> <tr> <th>Date Received</th> <th>Date Solved</th> </tr> </thead> <tbody> <tr> <td>26/11/2020 – Fan not function</td> <td>10/12/2020 – change with new set of fan</td> </tr> <tr> <td>19/12/2020 - Effluent pump no. 2 not function</td> <td>28/12/2020 – inspection and repair work has been conducted on 19/12/2020</td> </tr> <tr> <td>12/1/2021 – Lamp at house not function</td> <td>13/01/2021 – change the bulb</td> </tr> </tbody> </table>	Date Received	Date Solved	26/11/2020 – Fan not function	10/12/2020 – change with new set of fan	19/12/2020 - Effluent pump no. 2 not function	28/12/2020 – inspection and repair work has been conducted on 19/12/2020	12/1/2021 – Lamp at house not function	13/01/2021 – change the bulb	Complied
Date Received	Date Solved										
26/11/2020 – Fan not function	10/12/2020 – change with new set of fan										
19/12/2020 - Effluent pump no. 2 not function	28/12/2020 – inspection and repair work has been conducted on 19/12/2020										
12/1/2021 – Lamp at house not function	13/01/2021 – change the bulb										
<b>4.4.2.3</b>	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - <b>Minor compliance</b> -	Noted all workers were aware on the complaints and grievances book/form as per SIA report dated 29/01/2021. Noted during interview with workers/gender committee representative and stakeholders, the awareness on the complaints procedure is satisfactory.	Complied								
<b>4.4.2.4</b>	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - <b>Minor compliance</b> -	Noted all workers were aware on the complaints and grievances book/form as per SIA report dated 29/01/2021. Noted during interview with workers/gender committee representative and	Complied								

Criterion / Indicator		Assessment Findings	Compliance
		<p>stakeholders, the awareness on the complaints procedure is satisfactory.</p> <p>As the Movement Control Order prevent the stakeholder meeting to be conducted FY 2020, the mill has made initiative to send the correspondent email/Stakeholder Suggestion/ Complaints/ Feedback form. Reviewed the feedback from the stakeholder as follows:</p> <ol style="list-style-type: none"> <li>1. Teo Tuan Kwee Sdn. Bhd</li> <li>2. NUPW Johor State Branch</li> </ol>	
<b>4.4.2.5</b>	<p>Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.</p> <p><b>- Major compliance -</b></p>	<p>Complaints and resolutions has been documented and made available to affected stakeholders upon request. Seen complaint and requests book available from 2013 more than 24 months.</p>	Complied
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
<b>4.4.3.1</b>	<p>Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.</p> <p><b>- Minor compliance -</b></p>	<p>Contributions made based on consultation with relevant stakeholders as per following sample:</p> <ol style="list-style-type: none"> <li>1. Contribution of 2 units of air-cond for Masjid Kg. Sri Maju Jaya dated 05/03/2020</li> <li>2. Contribution of 'black soil' for SK Sri maju Jaya dated 26/09/2020</li> <li>3. "Bubur lambuk" contribution dated 10/11/2020</li> <li>4. "Kenduri Kilang" dated 08/12/2020</li> <li>5. Donation for child of Mr. Asmadi who have brain cancer dated 09/11/2020</li> </ol>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		- Contribution of crusher run for Kg. Sri Maju Jaya cemetri dated December 2020	
<b>Criterion 4.4.4: Employees safety and health</b>			
<b>4.4.4.1</b>	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. <b>- Major compliance -</b>	The Occupational Safety And Health Policy was established, Signed by President and Chief Operating Officer on 01/07/2018. The policy was communicated during Policy briefing from time to time. The policy was displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH personnel from Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors. In interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the policy.  The OSH plan was available for verification, dated Jan 2021. The plan was included to comply with safety and health policy, legal requirement, awareness programme, risk analysis, and others. The plan was communicated during periodically OSH meeting and implemented accordingly.	Complied
<b>4.4.4.2</b>	The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented.	Verification the OSH plan as per below :- a. The Occupational Safety and Health Policy was established, signed by President and Chief Operating Officer on 01/07/2018. Latest policy have been communicated on 21/03/2020 to all workers. Refer PM-MGR-05-F02-0. b. For risk in the operation the management conducted the assessment and establish the HIRARC for all activities such as	Complied

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<p>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:</p> <ul style="list-style-type: none"> <li>i. All employees involved are adequately trained on safe working practices;</li> <li>ii. All precautions attached to products should be properly observed and applied;</li> </ul> <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept and the concerns of employees and any remedial actions taken shall be recorded.</p>	<p>Boiler, engine room, sterilizer, office, store activities and others dated 10/11/2020. For chemical safety chemical hazard risk assessment (CHRA) already been conducted dated July 2018, report No JKKP HIE 127/171-2(154)-2018/025. Sighted management action plan dated 25/10/2019. Medical surveillance has been conducted, refer report MS for Mill Operator and Storekeeper dated 22/11/2020.</p> <p>Testing on ESP Commissioning has been conducted dated 28/10/2020 refer report number WR20986 conducted by Boilermech.</p> <p>Sighted Jadual Pematuhan AS(B)J31/152/000/004 valid until 04/12/2020. Sighted application of extension dated 02/07/2020 and mill has followed Clean Air Regulation after expiry of their license.</p> <p>c. Training matrix was established by the management. A formal training programmed on all aspects of MSPO requirement has been established and implemented. The training program for 2020/2021 includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to workers.</p> <p>d. The estates provide PPE to the employees relevant to the work handled by the workers. The list of PPE that were provided by the estates are as below:</p> <p>Boiler- Safety Helmet, Hand Glove, safety Boots, ear muff, heat resistant apron and respirator(N95)</p> <p>Engine room- Safety Helmet, Hand Glove, safety Boots and ear muff.</p> <p>Sterilizer- Safety Shoes, hard hat, glove and ear plug</p>	

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<p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>e. The following manuals contained SOP for chemical handling and used as a procedure in handling chemicals. SOP (safety working instruction) SOP-PRD-14 dated 30 June 2019, to handle the chemical for water testing must be handle by competent person with proper PPE and the test must be conduct at specific area as per requirement. Both were issued from Head Office and used in all operating units within the Group. SDS were kept in the file and workplace through verification during interview. Awareness training on handling of chemicals and SDS has been scheduled for the year of 2021.</p> <p>f. The Mill Manager has been appointed as the Chairman of the ESH committee. Inclusive in the Manager’s responsibilities are the Management Representative for the roles related to ISCC/RSPO/MSPO and QESHMS i.e. ISO 9001, ISO14001, OHSAS 18001 and MS 1722. The mill engineers/executives take the delegation of similar functions as assigned by the Manager.</p> <p>g. OSH Meeting conducted on 27/10/2020, previously was on 19/08/2020 and 25/06/2020. Verified minutes of meeting consist of accident review, workplace inspection, representative from management and workers. The needed for review any SOP and HIRARC also discuss during the meeting.</p> <p>h. ERT training and ERP procedure has been established with reference number SP-MGR-04 Rev 05 dated 01/07/2013 Training of ERP have been conducted on 26/02/2020</p> <p>i. First aid training already been conduct on 19-20 Nov 2019. Sighted sample of First Aider named Mr Bong Wei Liang and Mr Mohd Rasid Bin Sukirin. First aid box was check using video conference and found in order.</p>	

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		j. Accident record – JKPP 6 dated 10/11/2020, JKPP 8 has been sent refer JKPP 8/77142/2020 dated 22/01/2021. Accident has been discuss in the quarterly OSH meeting and HIRARC related with occurring accident was reviewed.	
<b>Criterion 4.4.5: Employment conditions</b>			
<b>4.4.5.1</b>	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees. <b>- Major compliance -</b>	The mill has established Social Policy signed by the President and Chief Operating Officer dated 14/09/2020. In the policy stated the company commitment to ensure that the workers and employees are treated fairly, equally, with respect according to local, national and ratified international law.  The policy were communicated to all the employee and stakeholders through briefing, training, and meeting and displayed at notice boards in the operating units.	Complied
<b>4.4.5.2</b>	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. <b>- Major compliance -</b>	The mill has established Social Policy signed by the President and Chief Operating Officer dated 14/09/2020. In the policy stated the company commitment to not discriminate in term 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.  The policy were communicated to all the employee and stakeholders through briefing, training, and meeting and displayed at notice boards in the operating units.	Complied
<b>4.4.5.3</b>	Management shall ensure that employees’ pay and conditions meet legal or industry minimum standards as per Collective Agreements.	Genting Plantations Berhad has established the template for employment agreement for all workers entitled “Perjanjian Pekerjaan”. Refer template no. HRAD WM, rev.4 dated 07/01/2019.	Complied

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	The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. <b>- Major compliance -</b>	All the terms and conditions stated in the employment agreement were as per Labour Act 1955, latest MAPA/NUPW Agreement and Minimum Wage Order 2020 (amendment).			
<b>4.4.5.4</b>	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. <b>- Minor compliance -</b>	The mill monitor the employees of contractors were paid based on legal or industry minimum standards. The mill holds a copy of the employment agreement between the contractors and his employee. Additionally, the contractors submit copy of employee payslip to the mill for references. Reviewed sampled employment contract and December 2020 payslip for Teo Tuan Kwee Sdn. Bhd. (CPO transporter) with employee with I/C no. 9005xx-01-61xx.	Complied		
<b>4.4.5.5</b>	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. <b>- Major compliance -</b>	All employees in mill is full time employed and a list of demographics with name, gender, nationality, identification (passport, permit and Malaysian identify card), age, date of birth date joined, category of work and work description.	Complied		
<b>4.4.5.6</b>	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records. <b>- Major compliance -</b>	Genting Plantations Berhad has established the template for employment agreement for all workers entitled "Perjanjian Pekerjaan". Refer template no. HRAD WM, rev.4 dated 07/01/2019. All the terms and conditions stated in the employment agreement were as per Labour Act 1955, latest MAPA/NUPW Agreement and Minimum Wage Order 2020 (amendment). Reviewed the sampled employment contract for employee as follows: <table border="1" data-bbox="1093 1337 1624 1367"> <tr> <td>Employment No.</td> <td>Date Joined</td> </tr> </table>	Employment No.	Date Joined	Complied
Employment No.	Date Joined				

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Criterion / Indicator		Assessment Findings		Compliance																
		<table border="1"> <tr><td>2861</td><td>01/09/2015</td></tr> <tr><td>2708</td><td>18/06/2011</td></tr> <tr><td>2969</td><td>27/11/2019</td></tr> <tr><td>2984L</td><td>17/08/2020</td></tr> <tr><td>2846F</td><td>29/08/2015</td></tr> <tr><td>2927F</td><td>08/01/2018</td></tr> <tr><td>2925F</td><td>08/01/2018</td></tr> </table> <p>The contract were also been brief to all the workers in their own mother language to ensure the understanding.</p>	2861	01/09/2015	2708	18/06/2011	2969	27/11/2019	2984L	17/08/2020	2846F	29/08/2015	2927F	08/01/2018	2925F	08/01/2018				
2861	01/09/2015																			
2708	18/06/2011																			
2969	27/11/2019																			
2984L	17/08/2020																			
2846F	29/08/2015																			
2927F	08/01/2018																			
2925F	08/01/2018																			
<b>4.4.5.7</b>	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p><b>- Major compliance -</b></p>	<p>The mill recorded the working hours and overtime using the punch card system which is overtime for both the employees and employers. Reviewed the punch card records for the month of August, September and October for workers as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Employment No.</th> </tr> </thead> <tbody> <tr><td>1</td><td>2861</td></tr> <tr><td>2</td><td>2708</td></tr> <tr><td>3</td><td>2969</td></tr> <tr><td>4</td><td>2984L</td></tr> <tr><td>5</td><td>2846F</td></tr> <tr><td>6</td><td>2927F</td></tr> <tr><td>7</td><td>2925F</td></tr> </tbody> </table> <p>All attendance and overtime records were found consistent with payslips.</p>		Employment No.	1	2861	2	2708	3	2969	4	2984L	5	2846F	6	2927F	7	2925F		Complied
	Employment No.																			
1	2861																			
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<b>4.4.5.8</b>	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p>	<p>Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 130 hours as per approval letter from Labour department dated 21/08/2018. Refer letter no. BHG.PU/9/134/ JLD 13(80).</p>		Complied																

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	- Major compliance -	<p>As at current status, there was none has crossed approved hours of overtime. Verified the pays lips, the payment and calculation of overtime well distributed.</p> <p>The overtime rate after 8 hours daily rated is: Process</p> <ul style="list-style-type: none"> <li>• Mon - Sat – daily rated / 8 hours x 1.5</li> <li>• Sunday - daily rated / 8 hours x 2.0</li> <li>• Public holiday – daily rated / 8 hours x 3.0</li> </ul> <p>The overtime rate after 8 hours piece rated is: Workshop</p> <ul style="list-style-type: none"> <li>• Mon - Sat – flat rate</li> <li>• Sunday – flat rate x 2.0</li> <li>• Public holiday – flat rate x 3.0</li> </ul>																	
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p>	<p>The mill recorded the working hours and overtime using the punch card system which is overtime for both the employees and employers.</p> <p>Sampled pay slips were reviewed for the month of August, September and October for workers as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Employment No.</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2861</td> </tr> <tr> <td>2</td> <td>2708</td> </tr> <tr> <td>3</td> <td>2969</td> </tr> <tr> <td>4</td> <td>2984L</td> </tr> <tr> <td>5</td> <td>2846F</td> </tr> <tr> <td>6</td> <td>2927F</td> </tr> <tr> <td>7</td> <td>2925F</td> </tr> </tbody> </table> <p>In the payslips shown the calculations of gross salary, all deductions and net salary of a worker were clearly recorded.</p>		Employment No.	1	2861	2	2708	3	2969	4	2984L	5	2846F	6	2927F	7	2925F	Complied
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<p><b>4.4.5.10</b> Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.</p> <p><b>- Minor compliance -</b></p>	<p>The management provided free medical facilities to all the workers and dependents. The company also subsidized water and electricity to certain units.</p>	<p>Complied</p>
<p><b>4.4.5.11</b> In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p> <p><b>- Major compliance -</b></p>	<p>Living quarters are provided to all workers but some local workers choose to stay outside as mill is close to housing and township. Houses are equipped with 2 bedroom and a bathroom. Utilities i.e. water and electricity is provided free. Rubbish is collected alternate days.</p>	<p>Complied</p>
<p><b>4.4.5.12</b> The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has established Social Policy signed by the President and Chief Operating Officer dated 14/09/2020. In the policy stated that the company prohibited any physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal use or other form of intimidation.</p> <p>Genting Plantations Berhad has also established the Sexual Harassment Policy signed by the Chief Operating officer dated 03/08/2009. In the policy started the commitment of the company to strive for harassment-free environment.</p> <p>The policy were communicated to all the employee and stakeholders through briefing, training, and meeting and displayed at notice boards in the operating units.</p>	<p>Complied</p>
<p><b>4.4.5.13</b> The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions</p>	<p>Genting Plantations Berhad has established Social Policy signed by the President and Chief Operating Officer dated 14/09/2020. In the policy stated that the company respect the workers right to join or</p>	<p>Complied</p>

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	relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. <b>- Major compliance -</b>	form legal trade union of their own choosing and to bargain collectively. The policy were communicated to all the employee and stakeholders through briefing, training, and meeting and displayed at notice boards in the operating units.	
<b>4.4.5.14</b>	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. <b>- Major compliance -</b>	Genting Plantations Berhad has established Social Policy signed by the President and Chief Operating Officer dated 14/09/2020. In the policy stated that the company shall not use any child labour. The children's right is respected. The policy were communicated to all the employee and stakeholders through briefing, training, and meeting and displayed at notice boards in the operating units. Reviewed and verified with the employee master list, no employee under age of 18 were employed. Workers are aware of the minimum age policy is being strictly enforced by the management at which the age limit is above 18 years old.	Complied
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. <b>- Major compliance -</b>	The mill has established the training program for the mill executive, workers and contractors base on training need analysis conducted and documented in Training Schedule for Employee/Contractors. Sighted the training records as follows: 1. Hearing conservation training dated 05/01/2021 2. ISCC, MSPO, RSPO Awareness dated 17/9/2020 3. Safety Induction Training dated 02/02/2021 4. Accident investigation dated 26/02/2020	Complied
<b>4.4.6.2</b>	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in	The mill has established the training program for the mill executive, workers and contractors base on training need analysis conducted.	Complied

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	order to provide the specific skill and competency required to all employees based on their job description. <b>- Major compliance -</b>	The training need analysis was documented in Training Matrix analysis. The analysis was based on job designation and type of training needs for the employee. The training type was divided into 3 type, Core training, Non-core training – theoretical training and non-core training – theoretical and hands on training.	
<b>4.4.6.3</b>	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure. <b>- Minor compliance -</b>	The mill has training program which updated annually based on training need analysis. The training identified were programmed throughout the year dated 15 Jan 2020.	Complied
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
<b>4.5.1.1</b>	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. <b>- Major compliance -</b>	Genting Plantations Berhad has established Environmental and documented in Quality, Occupational Safety and Health and Environmental Policy signed by the CEO on 05/10/2009. The policy was communicated through training, briefing and displayed on notice board at several placed in the mill.  Sighted availability of Environmental Audit Report dated 05/02/2021 by Mr Kee Chong Yee, Environmental Auditor DOE Reg No. Ea0081. Refer report ASJ(B)31/152/000/004 Jld.9(08)/2021/01. Sighted Jadual Pematuhan. All operation found follow the guideline in Jadual Pematuhan.	Complied
<b>4.5.1.2</b>	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations	The mill has conducted assessment on aspects and impacts analysis and established the environmental management plan base on activity with significant impact to the environment. The management plan was documented in Significant Environmental	Complied

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	- <b>Major compliance</b> -	Aspect and Impacts Registrar Form. Refer doc no. SP-MGR-02-F01-00 dated 07/11/2018.	
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - <b>Major compliance</b> -	The mill has established the environmental management plan base on activity with significant impact to the environment. The management plan was documented in Significant Environmental Aspect and Impacts Registrar Form. Refer doc no. FPI/L4/QOSHE 1.8 Pind 0 dated 04/02/2021.	Complied
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - <b>Minor compliance</b> -	The mill has established program and management plan to promote positive impact identified in the aspects and impacts analysis conducted and documented in Environmental Management plan. Sighted the program to promote the positive impact as follows: a) To minimize the emission of smoke from moving vehicle b) Changes of machinery to control of noise generate from mill operation. c) Flatbed rehabilitation program Feb 2021.	Complied
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - <b>Major compliance</b> -	A training program is available in the Mill Training Plan updated on yearly basis and revised as per the management requirement. Included in this plan is the internal and external program. Among the subjects identified related to environment are schedule waste training, water analysis training, POME analysis, chemical handling training and others.	Complied
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - <b>Major compliance</b> -	The management already organize regular meeting with workers regarding to environmental. The meeting was EPMC (08/2020) meeting was done dated 08/10/2020, the meeting to discuss concerns of workers about the environmental quality and others.	Complied

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<b>Criterion 4.5.2:</b> Efficiency of energy use and use of renewable energy											
<b>4.5.2.1</b>	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period <b>- Major compliance -</b>	The mill has established baseline for consumption of non-renewable energy monitored on monthly basis. Sighted the records of Diesel consumption per FFB processed FY 2020 as per monthly report to Senior Vice President – Processing Malaysia and Downstream Manufacturing. Refer Report: 1. Diesel consumption December 2020 dated 04/01/2021 2. Diesel consumption January 2021 dated 03/02/2021 Plan to reduce the usage of the non-renewable energy has been established by using renewable energy such as shell and kernel as fuel for boiler to reduce the usage of diesel.	Complied								
<b>4.5.2.2</b>	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. <b>- Major compliance -</b>	Estimation of direct usage of non-renewable energy was determine in annual budget. The estimation of direct usage of non-renewable energy (diesel & petrol) for operations to determine energy efficiency of their operations inclusive of fuel use by contractors (transport & machinery).	Complied								
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible. <b>- Minor compliance -</b>	Renewable energy used is from biofuel, shell and EFB/fiber for boiler start-up. Sighted the sampled records of renewable energy usage for FY 2020 as follows: <table border="1" data-bbox="1086 1189 1870 1332"> <thead> <tr> <th>Month</th> <th>2020 (MT)</th> </tr> </thead> <tbody> <tr> <td>Oct 2020</td> <td>88.870</td> </tr> <tr> <td>Nov 2020</td> <td>103.540</td> </tr> <tr> <td>Dec 2020</td> <td>47.550</td> </tr> </tbody> </table>	Month	2020 (MT)	Oct 2020	88.870	Nov 2020	103.540	Dec 2020	47.550	Complied
Month	2020 (MT)										
Oct 2020	88.870										
Nov 2020	103.540										
Dec 2020	47.550										
<b>Criterion 4.5.3:</b> Waste management and disposal											

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4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p><b>- Major compliance -</b></p>	<p>The mill has identified all waste products and source of pollutions and documented in Identification of Source and Type of Waste. The waste identified as follows:</p> <ul style="list-style-type: none"> <li>i. Scheduled Waste <ul style="list-style-type: none"> <li>- Mill Operation – Used PPE, Used lubricant and hydraulic oil</li> <li>- Office and housing – Lamp, Electronic device</li> </ul> </li> <li>ii. Non-schedule waste <ul style="list-style-type: none"> <li>- mill operation – used tyre, scrap iron</li> <li>- office and housing – Paper, Plastic, domestic waste</li> </ul> </li> <li>iii. mill by-product <ul style="list-style-type: none"> <li>- EFB, POME, Shell, Mesocarp fibre</li> </ul> </li> </ul>	Complied
4.5.3.2	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <ul style="list-style-type: none"> <li>a) Identifying and monitoring sources of waste and pollution.</li> <li>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</li> </ul> <p><b>- Major compliance -</b></p>	<p>The mill has established waste management plan base on the identification and source of pollutions and documented in Identification of Source and Type of Waste. Refer waste management plan dated 13/01/2021.</p>	Complied
4.5.3.3	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p>	<p>SOP for handling scheduled wastes has been established entitled Waste Management. Ref doc no. SP-MGR-09 rev. 4 dated 10/09/2020 in order to comply with the Environmental Quality Regulations (Scheduled Waste) 2005.</p>	Complied

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	- <b>Major compliance</b> -	The mill has a proper Scheduled Waste Store for storing scheduled waste (inventory record) until time of disposal by DOE authorized waste disposal contractor. Sighted the sampled scheduled waste disposal records: 1. 12/01/2021 for SW 430; C/N no: 2021011211V9FKP4 2. 12/01/2021 for SW 322; C/N no: 2021011211KDOQYG	
<b>4.5.3.4</b>	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - <b>Minor compliance</b> -	Domestic waste was managed by neighbouring estates and dispose in designated landfill. The landfill located far from the housing area and watercourses. Sighted evidence of Rekod Pungutan Sampah which last collection record on 28/01/2021.	Complied
<b>Criterion 4.5.4:</b> Reduction of pollution and emission			
<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - <b>Major compliance</b> -	The assessment of all polluting activities was conducted through environmental aspect and impact assessment which includes the greenhouse gas emissions, stack emission, scheduled wastes, solid wastes, and effluent dated 07/02/2021. Monitoring plan was established based on Environment Aspect and Impact assessment DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling. Sighted Summary Of Effluent Treatment Plant report for January 2021. Observed the stack emission monitoring as per DOE requirement: Report EIH1921(157-15)/GOMSB (AMB) Sighted Ambient Air Monitoring Report dated 23/12/2020 refer EIH2012(102-103)/GOMSB(AMB).	Complied

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4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. <b>- Major compliance -</b>	The mill has identified all significant pollutant and documented in Quality, Safety and health and Environmental objective. Sighted evidence of Significant Pollutants and Greenhouse (GHG) Emission / minimization Plan for the year 2021 dated 13/01/2021 prepared by Rosmawati Jamhari and approved by Mill Manager.	Complied												
4.5.4.3	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations. <b>- Major compliance -</b>	<p>Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE accordingly. Sighted the Quarterly Return Form to DOE as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>pH</th> <th>BOD</th> </tr> </thead> <tbody> <tr> <td>October</td> <td>9.2</td> <td>44</td> </tr> <tr> <td>November</td> <td>9.1</td> <td>86</td> </tr> <tr> <td>December</td> <td>9.0</td> <td>82</td> </tr> </tbody> </table>	Month	pH	BOD	October	9.2	44	November	9.1	86	December	9.0	82	Complied
Month	pH	BOD													
October	9.2	44													
November	9.1	86													
December	9.0	82													
<b>Criterion 4.5.5: Natural water resources</b>															
4.5.5.1	The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: <ul style="list-style-type: none"> <li>a) Assessment of water usage and sources.</li> <li>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</li> <li>c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> </ul>	<p>Mill has established the Water Management Plan and latest review was sighted on 27/10/2020. The management plan focusing on water shortage/contamination and water usage efficiency. In the plan stated the root cause, mitigation plan and Person In Charge for each plan programmed.</p> <p>Water analysis has been conducted on 09/11/2020 and report received on 05/01/2021 with reference number Genting/RW/POM7683 (A&amp;B) was comply with INWQS.</p> <p>Sighted the implementation of water management plan as follows:</p> <ul style="list-style-type: none"> <li>i. Monthly record of water usage/ton FFB, sighted the records in Monthly Environmental Performance Indicators. Sighted the sampled record for FY 2020. Record of usage as follows:</li> </ul>	Complied												

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Criterion / Indicator		Assessment Findings		Compliance
	- Major compliance -	Month	Water (liter/FFB tonne )	
		December 2020	1.15	
		November 2020	1.14	
<b>4.5.5.2</b>	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.  - Major compliance -	The mill conducted river water sampling on monthly basis as required by 'Jadual Pematuhan'. Sighted the results of river water sampling for Sg. Erong as follows:  i. Report date: 09/11/2020 and report received on 05/01/2021 with reference number Genting/RW/POM7683(A&B)		Complied
<b>4.6 Principle 6: Best Practices</b>				
<b>Criterion 4.6.1: Mill Management</b>				
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  - Major compliance -	The SOP for the estates and mill operations are available which is prepared on Group basis. There are levels/types of the documentation identified as follows: a) Quality, Environmental, Safety & Health & Sustainability Manual – 01/7/17 b) System Procedure – 01/1/2012 c) Procedure Manual – 02/1/2018 d) SOM Standard Operating Manual – 2013 e) Safe Operating Procedure – 01/1/2011 f) Environmental Control Procedure – 01/9/2018 g) Store Operating Manual – 2014 h) Jobs description - 2012  The mill operations are supervised by the staff, Engineers of the Mill.		Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Training for contractor has been prepared once the contractor entered to the mill for the project. HIRARC and SOP indicates that contractor will be given awareness training related Safety and Health, Environment, Legal and Best Practice. Their tools will be checked to avoid any unlicensed equipment.	
<b>4.6.1.2</b>	All palm oil mills shall implement best practices. - <b>Major compliance</b> -	The monitoring of the mill process is made through the shift supervision headed by An Engineer/Executives. All process parameters are documented and summarized in a daily report. The external monitoring is made through visits i.e. SVP and the mill management team.	Complied
<b>Criterion 4.6.2:</b> Economic and financial viability plan			
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - <b>Major compliance</b> -	The mill has developed 5-years business plan from Year 2022 to Year 2026. The business plan has included the production cost, projected OER and KER rate. The budget contains operation cost such as labour cost, chemical cost and electricity cost.	Complied
<b>Criterion 4.6.3:</b> Transparent and fair price dealing			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - <b>Major compliance</b> -	The pricing mechanism was conducted as per contract agreement between the CPO Transporter and Genting Oil Mill Sdn. Bhd. Stated in the agreement under section The Schedule. Pricing of the CPO transportation per ton shown in the Schedule (iii) in the contract agreement. Sighted sampled contract between: 1. Makmur Transport Sdn. Bhd. and Genting Oil Mill Sdn. Bhd. dated 01/03/2018. 2. Teo Tuan Kwee Sdn. Bhd. and Genting Oil Mill Sdn. Bhd. dated 01/03/2018.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.6.3.2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	Based on sample agreements sighted and the interview with contractor, the contractual agreements confirmed to be understand by all parties and fair, legal as well as transparent. Reviewed the sampled payment made as per contract agreement as follows: Payment for Zhe Ming Engineering as per Invoice no. INV 2008-033 dated 19/08/2020. The work has been paid on 01/10/2020 as per transaction reference no. 520810120100003.	Complied
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. <b>- Major compliance -</b>	The contractors were made to understand the MSPO requirements and shall provide the required documentation and information through meetings and trainings. Records of attendance of the meetings were available for verification. All contractors to be appointed by the mill must understand and complied with the MSPO requirement as stated in the tender document under section 8.2 Clause for RSPO and MSPO and Sustainability Requirement Clause.	Complied
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	All contractors to be appointed by the mill must understand and complied with the MSPO requirement as stated in the tender document under section 8.2 Clause for RSPO and MSPO and Sustainability Requirement Clause. Reviewed the contract between Tuck Ho Engineering Sdn. Bhd. and Genting Oil Mill Sdn. Bhd. dated 29/10/2020.	Complied
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.	All mill under Genting Plantation has no objection to allow BSI auditors to verify the assessment through physical inspection if required.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<b>- Minor compliance -</b>	

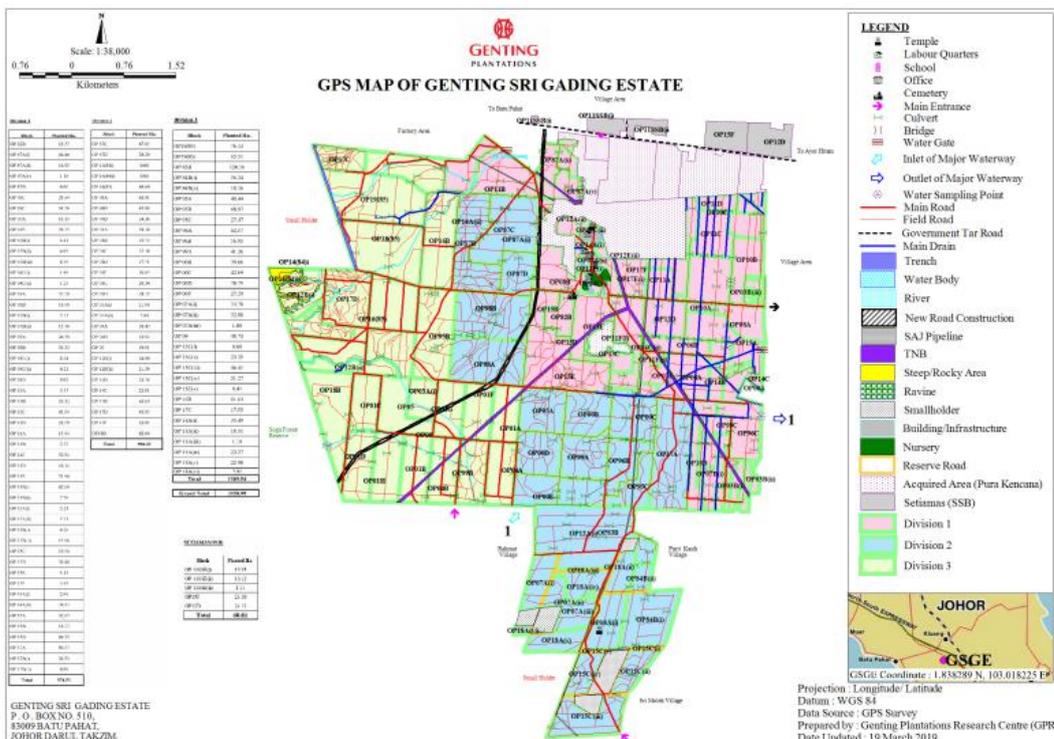
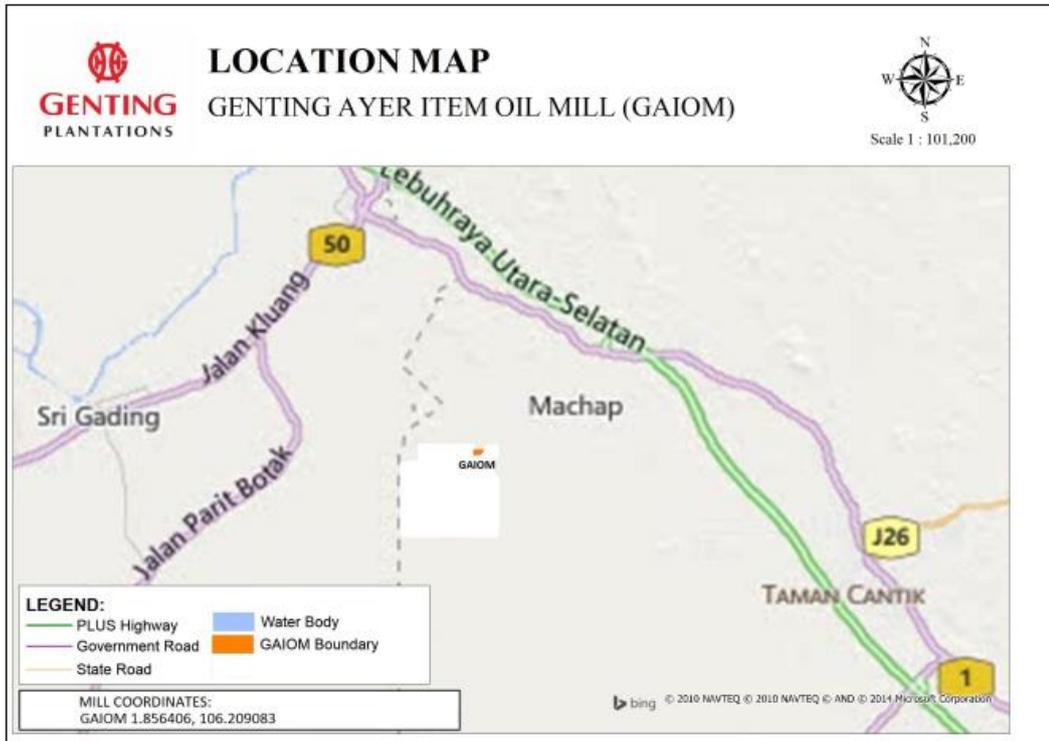
**Appendix B: List of Stakeholders Contacted**

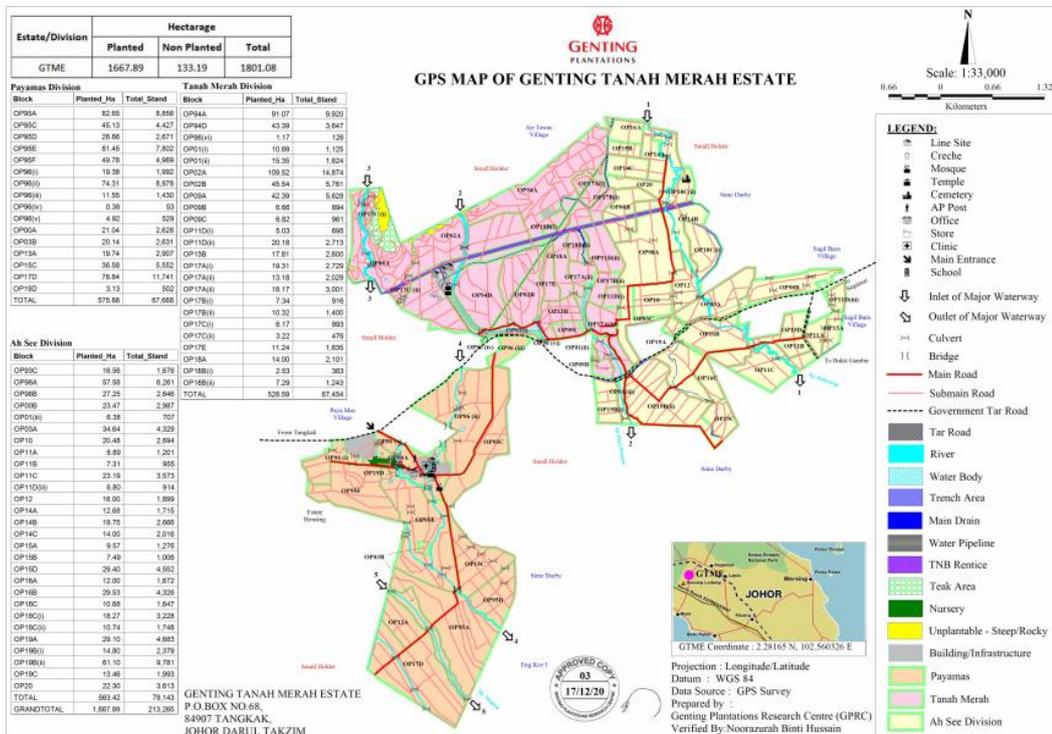
<p><b>Government Officer:</b>          NUPW          SJKT Ladang Tebong          Tadika Sri Gading</p>	<p><b>Community/neighbouring village:</b>          Kg Sri Maju Jaya - Head of Villagers          Hj Jauri Keman - Head of Villagers          Muhammad Fathi Bin Ali - Cow Cather          Tok Batin Kg Orang Asli Bukit Putus</p>
<p><b>Suppliers/Contractors/Vendors:</b>          Makmur Transport Sdn Bhd          Kejuruteraan Eletrik ETARA          Arumugam Adekan          Low Lam Hoe</p>	<p><b>Worker's Representative/Gender Committee:</b>          Pn Azizah - Gender Committee          Mdm Muniammal - Gender Committee</p>

**Appendix C: Smallholder Member Details**

Nil

**Appendix D: Location and Field Map**





## Appendix E: List of Abbreviations

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm 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
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MSPO	Malaysian Sustainable Palm Oil
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
RTE	Rare, Threatened or Endangered species
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
GAIOM	Genting Ayer Item Oil Mill
GTBE	Genting Tebong Estate
GSGE	Genting Sri Gading Estate
GTME	Genting Tanah Merah Estate.