

### MALAYSIAN SUSTAINABLE PALM OIL ANNUAL SURVEILLANCE ASSESSMENT 2 (ASA 2) Public Summary Report

### **FGV Holdings Berhad**

Client company Address:
Plantation Sustainability Department, Level 20 (W), Wisma FGV
Jalan Raja Laut, 50350 Kuala Lumpur, Malaysia

Certification Unit:
Belitong Palm Oil Mill and Supply Base (Bukit Tongkat B Estate and Ulu Belitong Estate)

Location of Certification Unit: Kilang Kelapa Sawit Belitong, KM 28, Jalan Kluang/Kota Tinggi 86000 Kluang, Johor, Malaysia

Report prepared by: Muhamad Naqiuddin Mazeli (Lead Auditor)

Report Number: 3091770

### **Assessment Conducted by:**

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### **Section 1: Executive Summary**

1.1 Organizational Information and Contact Person					
Company Name	FGV Holdings Berhad				
Mill/Estate	MPOB License No.		Expiry Date		
	FGVPISB Belitong Palm Oil Mill - 6182	297015000	31/3/2021		
	FGVPM Bukit Tongkat B Estate - 5588	FGVPM Bukit Tongkat B Estate - 558895002000			
	FGVASSB Ulu Belitong Estate - 50354	0902000	31/8/2021		
Address	Kilang Kelapa Sawit Belitong, KM 28 Johor, Malaysia	3, Jalan Kluar	ng/Kota Tinggi, 86000 Kluang,		
Certification Unit	Belitong Palm Oil Mill and Supply Bas	e			
Contact Person Name	Mr Ameer Izyanif Bin Hamzah				
Website	www.feldaglobal.com	ameer.h@fgvholdings.com			
Telephone	+603-2789 1338	Facsimile	+603-2789 0001		

1.2 Certification Information						
Certificate Number	Mill: MSPO 693232 Estate: MSPO 693234					
Issue Date	21/05/2019		Expiry date	20/05/2024		
Scope of Certification	on Mill: Production of S Estate: Production of			Products		
Standard MS 2530-3:2013 Part 3: General principles for oil palm plantations and organization smallholders MS 2530-4:2013 Part 4: General principles for palm oil mills				ons and organized		
Stage 1 Date		04-05/06/2018				
Stage 2 / Initial Ass	sessment Visit Date (IAV)	16-18/10/2018				
Continuous Assessr	nent Visit Date (CAV) 1	12-15/11/2019				
Continuous Assessr	ment Visit Date (CAV) 2	15-17/12/2020				
Continuous Assessr	ment Visit Date (CAV) 3	-				
Continuous Assessr	ment Visit Date (CAV) 4	-				
Other Certificat	Other Certifications					
Certificate Number	Standard(	(s)	Certificate	Issued by	Expiry Date	
RSPO 693230	RSPO P&C 2018: MYNI 2	019	BSI Services N Bhd	Malaysia Sdn	06/02/2024	



1.3 Location of Certification Unit						
Name of the Certification Unit	Site Address	GPS Reference	of the site office			
(Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)		Longitude	Latitude			
FGVPISB Belitong Palm Oil Mill	Kilang Kelapa Sawit Belitong, KM 28, Jalan Kluang/Kota Tinggi, 86000 Kluang, Johor, Malaysia	103° 29′ 55″ E	1° 56′ 18″ N			
FGVPM Bukit Tongkat B Estate	Ladang FGVPM Bukit Tongkat B, 86000 Kluang, Johor, Malaysia	103° 30′ 14″ E	1° 56′ 29″ N			
FGVASSB Ulu Belitong Estate	Stesen FASSB Ulu Belitong, 86000 Kluang, Johor, Malaysia	103° 28′ 39″ E	1° 56′ 22″ N			

1.4 Certified Area							
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted		
FGVPM Bukit Tongkat B Estate	970.25	0	267.60	1,237.85	78.38		
FGVASSB Ulu Belitong Estate	127.37	0	20.33	147.70	86.23		
Total	1,097.62	0	287.93	1,385.55			

- 1. FGVPM Bkt Tongkat Estate:
- Previous Total Planted (2019), 1,070.66 Ha reduction (-100.41 Ha), whereby for the year 2020 reduced to 970.25 Ha due to remapping by LMU. (PM 00G: -12.9 Ha, 00H: +4.57 Ha, 06J: -10.18 Ha, 07M: -10.18 Ha, 10N: -17.84 Ha, 11Q: -17.05 Ha, 14T: -36.83 Ha)
- Previous Total Area (2019), 1,242.52 Ha reduction (-4.67 Ha), whereby for the year 2020 reduced to 1,237.85 Ha due to remapping by LMU (-1.92 Ha removed from surrounding areas & 6.59 Ha returned to state government)
- 2. FGVASSB Ulu Belitong Estate:
- Previous Total Planted (2019), 124.28 Ha increased (+3.09 Ha), whereby for the year 2020 increased to 127.37 Ha due to remapping by LMU. (increased 2.16 Ha for Peringkat 1 & 0.93 Ha for Peringkat 3)
- Previous Total Area (2019), 133.42 Ha increased (+14.28) Ha, whereby for the year 2020 increased to 147.70 Ha due to remapping by LMU. (increased 13.34 Ha for Peringkat 1 & 0.94 Ha for Peringkat 3)

1.5 Plantings & Cycle							
Estato	Age (Years)				M-1	T	
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Mature	Immature
FGVPM Bukit Tongkat B Estate	0	176.15	678.29	0	115.81	970.25	0
FGVASSB Ulu Belitong Estate	0	81.33	46.04	0	0	127.37	0
Total	0	257.48	724.33	0	115.81	1,097.62	0



1.6 Certified Tonnage of FFB								
	Tonnage / year							
Estate	Estimated (May 2020 - Apr 2021)	Actual (May 2020 - Nov 2020)	Forecast (May 2021 - Nov 2022)					
FGVPM Bukit Tongkat B	16,413.53	10,950.93	22,000.00					
FGVASSB Ulu Belitong	3,602.97	2,264.38	3,000.00					
Total	20,016.50	13,215.31	25,000.00					
Note:		•						
Nil								

1.7 Uncertified Tonnage of FFB						
	Tonnage / year					
Estate	Estimated (May 2020 - Apr 2021)	Actual (May 2020 - Nov 2020)	Forecast (May 2021 - Nov 2022)			
FELDA Bukit Permai	20,000	12,583.65	23,000			
FELDA Ulu Penggeli	30,000	21,530.20	40,000			
Felda Bukit Tongkat	23,000	13,479.72	28,000			
FELDA Ulu Belitong	33,000	26,281.28	48,000			
FELDA Layang-layang	15,000	8,626.06	17,000			
FELDA Ayer Hitam	2,000	1,195.26	2,000			
Smallholder	130,000	58,463.13	13,5000			
Total	253,000	142,159.30	293,000			

1.8 Certified Tonnage CPO							
	Estimated (May 2020-Apr 2021)	Actual (May 2020 - Nov 2020)	Forecast (May 2021 - Nov 2022)				
Mill Capacity:	FFB	FFB	FFB				
54 MT/hr	20,016.50	13,215.31	25,000.00				
	CPO (OER: 20.70%)	CPO (OER: 17.15%)	CPO (OER: 20.5 %)				
SCC Model:	4,143.42	2,266.33	5,125.00				
1.15	PK (KER: 5.75 %)	PK (KER: 4.53 %)	PK (KER: 5.5 %)				
	1,150.95	599.69	1,375.00				



1.9 Actual Sold Volume (CPO)							
CDO (MT)	MSPO Certified	Other Scher	nes Certified	Conventional	Total		
CPO (MT)	143FO Cel tilleu	ISCC	RSPO	Conventional	Total		
2,266.33	0	0	0	2,266.33	2,266.33		

1.10 Actual Sold Volume (PK)							
DV (MT)	MSPO Certified	Other Schei	mes Certified	Conventional	Total		
PK (MT)	MSPO Cel tilled	ISCC	RSPO	Conventional	iotai		
599.69	0	0	0	0.00	599.69		



### **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 on-site assessment was conducted from 15-17/12/2020. The audit programme is included as Section 2.3. The approach to the audit was to treat the Belitong Palm Oil Mill and Supply Base 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 private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix B.

All the previous nonconformities are remains closed. The assessment findings for the 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.



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

Assessment Program							
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)		
FGVPISB Belitong Palm Oil Mill	√	√	√	√	√		
FGVPM Bukit Tongkat B Estate	√	√	√	√	√		
FASSB Ulu Belitong Estate	√	√	√	√	√		

**Tentative Date of Next Visit: December 1, 2021 - December 3, 2021** 

**Total No. of Mandays: 6.0 Mandays** 

#### 2.1 BSI Assessment Team

Team Member Name	Role (Team Leader or Team member)	Qualifications (Short description of the team members)
Muhamad Naqiuddin Mazeli	Lead Auditor	He graduated with Bachelor of Science Horticulture at University Putra Malaysia. He started his career in 2009 as Researcher at Sime Darby Research Seed Centre and manage for Quality control for seed production for paddy, chilli and corn with collaboration with Malaysian Agricultural Research and Development Institute (MARDI) for 4 years. During the period, he was also involved with Nestle project on Red Rice production. He later joins the Sime Darby Plantation Berhad Sustainability Team in 2013 as Sustainability Executive. Joining the sustainability team, he managed, implemented and monitored the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training and internal audits related to RSPO, MSPO and other certifications where applicable to the operations within Sime Darby Plantation. He is a trained Safety Officer and he managed the Occupation Safety and Health of Northern Region Sime Darby Plantation Berhad operations. During this assessment, he assessed on the aspects of Social and workers consultation.
Muhammad Fadzli Masran	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 career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & 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 mill and estate best practices, waste
	management, HCV, environmental and occupational safety & health. He is
	fluent in Bahasa Malaysia and English languages.

### 2.2 Assessment Plan

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

Date	Time	Subjects	MNM	MFM
Monday 14/12/2020		Travel from office to Kluang	√	√
Tuesday 15/12/2020	, , , , , , , , , , , , , , , , , , , ,		√	√
	0900-1230	Belitong Palm Oil Mill Field Assessment: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√
	1230-1330	Lunch	√	√
	1330-1700	Document Review (MS:2530 Part 4), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices	√	√
	1700-1730	Interim Closing meeting	√	√
Wednesday 16/12/2020	0800-1230	Ulu Belitong Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√
	1000-1100	Meeting with stakeholders (Government, villagers, smallholders, Union Leader, contractor etc.)		√



Date	Time	Subjects	MNM	MFM
	1230-1330	Lunch / Break	√	√
	1330-1700	Document review (MS:2530 Part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices, P7: Development of New Planting	√	<b>√</b>
	1700-1730	Interim Closing Meeting	√	√
Thursday 17/12/2020	0800-1230	Bukit Tongkat B Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√
	1000-1100	Meeting with stakeholders (Government, villagers, smallholders, Union Leader, contractor etc.)	<b>√</b>	<b>√</b>
	1230-1330	Lunch / Break	√	√
	1330-1600	Document review (MS:2530 Part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices, P7: Development of New Planting	√	<b>√</b>
	1600-1700	Preparation for Closing meeting	√	√
	1700-1730	Closing Meeting	√	√



### **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

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

The nonconformity is listed below.

During the Certification Assessment there were three (3) Major & two (2) Minor nonconformities raised. The FGV Belitong POM and Supply base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Non-conformity(ies) has been verified for its effectiveness and closed accordingly.

Major Nonconformities:			
Ref: 2002762-202012-M1	Area/Process: Ulu Belitong Estate and Bukit Tongkat B Estate	Clause: 4.3.1.1 Part 3	
	Issue Date: 17/12/2020	Close Date: 8/3/2021	
Requirements:	All operations are in compliance with the application international laws and regulations	able local, state, national and ratified	
Statement of Nonconformity:	Found the contractor and management are applicable local, state, national and ratified inter-		
Objective Evidence:	applicable local, state, national and ratified international laws and regulations  Zaidan Joyoo Enterprise on FFB transportation.  From the sample workers were: - 8xxxxx-01-xx97 8xxxxx-01-xx49 a) found under November 2020 payslip for both no double payment for working on rest day on 6/11/2020 and 13/11/2020 as per November Payslip and 'Rekod Harian Pekerja' verification not comply with Section 60(3)(d) under Employment Act 1955. b) Sighted no SOCSO deduction from wages for Zaidan Joyoo Enterprise workers as per verification on payslip on Jan, July and November 2020 not comply with Section 7 under Employees Social Security Act 1969.		
	The management will be subsidized RM 4 for ware month to all workers a per the employment confor July 2020 found that some of workers did not The sampled workers as below:-	tract. However, sampled the payslips	
	Employee No:- FW06010155, FW06010157, FW06010158, FW06010134		



Corrections:	Awareness to contractor on EPF, SOCSO deduction as well as comply with employment act especially working on public holiday and rest day.	
	Management to ensure all workers received subsidized RM 4 for water bill and RM 6 for electricity every month as per the employment contract by developing the checklist.	
Root cause analysis:	No supervision by management in monitoring on contractor worker payment for working on rest day due to no person in charge on this matter.	
	2. Lack of monitoring from management regarding on EPF and SOCSO deduction in contractor workers payslip due to no person in charge on this matter.	
	3. No monitoring and enforcement from management regarding payment of subsidized RM 4 for water bill and RM 6 for electricity every month to all the workers as per the employment contract no person in charge on this matter.	
Corrective Actions:	1. Management to ensure all contractors will deduct the EPF, SOCSO deduction as well as payment on working on rest day in contractor workers payslip and will obtain the copy for record.	
	2. Appoint person incharge to ensure all workers received subsidized RM 4 for water bill and RM 6 for electricity every month to all the workers as per the employment contract.	
Assessment Conclusion:	As per evidence from Zaidan Joyo Enterprise latest payslip (Feb 2021) no deduction been made to their workers for water and electricity and also the company already deduct the EPF, SOCSO thus Major NC was close on 8/3/2021. The corrective action evidence found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment.	

Major Nonconformities:			
Ref: 2002762-202012-M2	Area/Process: Ulu Belitong Estate and Bukit Tongkat B Estate	Clause: 4.5.3.3 Part 3	
	Issue Date: 17/12/2020	Close Date: 8/3/2021	
Requirements:	The contractors conduct the off-site scheduled N DOE	waste disposal without approval from	
Statement of Nonconformity:	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.		
Objective Evidence:	FAS Ulu Belitong For vehicle maintenance, the estate has appointed contractors, Aeroline Sdn. Bhd. to conduct the services. The waste generated from the activity were collected and disposed by the contractors. However, there is no evidences of the contractors appointed have an approval letter/permit from DOE to conduct off-site scheduled waste disposal.		
Corrections:	The estate management need to monitor and enforce on third party (Aeroline Sdn Bhd) on permit from DOE to carry out the scheduled wastes generated from the estate.		
Root cause analysis:	No supervision by management on third party (Aeroline Sdn Bhd) on permit from DOE to carry out the scheduled wastes generated from the estate due to no person in charge on this matter.		



Corrective Actions:	The management need to discuss this issues in the OSH meeting endorsed by regional/ HQ SHO to make sure this issues not repeated next time.
Assessment Conclusion:	As per evidence of letter Bil; (27)810630001/01/01-2020 dated 17/12/2020 and notification of scheduled waste (AS(B)J95/130/100/536) showed that confirmation of Aeroline Company as company that representative for Pentas Flora Sdn Bhd to transport Scheduled waste thus Major NC was close on 8/3/2021. The corrective action evidence found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment.

Major Nonconformities:			
Ref:	Area/Process: Belitong POM	Clause: 4.4.4.1 Part 4	
2002762-202012-M3	Issue Date: 17/12/2020	Close Date: 8/3/2021	
Requirements:	Recommendation from medical surveillance repo	ort were not effectively implemented	
Statement of Nonconformity:	An occupational safety and health policy and pl Safety and Health Act 1994 and Factories and M documented, effectively communicated and impl	flachinery Act 1967 (Act 139) shall be	
Objective Evidence:	Belitong POM Based on the Medical Surveillance report dated January 2020, 1 worker were found to have anemia and declared temporary unfit to work at his current station, workshop till further investigation conducted. However, no investigation has been conducted and the workers were currently continued working in the workshop.		
Corrections:	Management to conduct further investigation or a medical retest to one worker which resulted to have anaemia and declared temporary unfit to work till further investigation was conducted as reported in the medical surveillance report.		
	Management need to changes the workplaces from operational section to administrative section		
Root cause analysis:	Management did not proceed further investigation or a medical retest to one worker which resulted to have anaemia and declared temporary unfit to work till further investigation was conducted as reported in the medical surveillance report due to no awareness about this matter to person in charge.		
Corrective Actions:	Based on result soon, management need to decide whether that worker continue the work or not.		
<ol><li>Management to discuss this issues in the OSHA meeting and to conduct t person in charge</li></ol>		HA meeting and to conduct training to	
Assessment Conclusion:	As per evidence of Transfer Letter (73) 4056/BLT/840/11 dated 26/12/2020 and investigation record dated 16/12/2020 thus Major NC was close on 8/3/2021. The corrective action evidence found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment.		

Minor Nonconformities:			
Ref:	Area/Process: Belitong POM	Clause: 4.4.4.2 Part 4	
2002762-202012-N1	Issue Date: 17/12/2020	Close Date: Open	



Requirements:	Contractor workers were not provided appropriate PPE as per employment contract	
Statement of Nonconformity:	The occupational safety and health plan should cover the following: 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).	
Objective Evidence:	Belitong POM	
	Noted during interview with contractor workers (Hamid Engineering & Enterprise) who work as sorter at loading ramp, they were not provided with safety shoes which they have to purchase by themselves. This was against their employment contract under section  i) PPE will be provided by the employer appropriate to the job.	
Corrections:	Management need to instruct contractor to issuance PPE to their workers by memo  Develop checklist for contractor workers on PPE issuance	
Root cause analysis:	Belitong POM: No supervision & no enforcement to contractor on PPE issuance by management due to new changes person in charge.	
Corrective Actions:	Appoint person in charge to ensure all contractor workers received PPE from contractor Management to discuss these issues in the OSHA meeting.	
Assessment Conclusion:	The correction and corrective action plan are accepted. Verification of evidence of effective implementation shall be carried out in the next surveillance assessment.	

Minor Nonconformities:			
Ref:	Area/Process: Belitong POM	Clause: 4.4.5.4 Part 4	
2002762-202012-N2	Issue Date: 17/12/2020	Close Date: Open	
Requirements:	Found the employees of contractors not paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.		
Statement of Nonconformity:	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.		
Objective Evidence:	Hamid Engineering & Enterprise on sorting FFB: From the sample workers were :- 8xxxxx-01-xx33 8xxxxx-01-xx71 6xxxxx-01-xx07 6xxxxx-01-xx37 8xxxxx-01-xx17 found under June 2020 payslip for 80xxx1-01-6xx7 no triple payment for working on public holiday on 8 June 2020 (Agong Birthday) and 23 March 2020 (Hari Keputeraan		
Corrections:	Rasmi DYMM Sultan Johor) as per June Payslip and Punch card verification.  Management to ensure all workers in comply with employment act especially pay the worker who work on public holiday.		



Root cause analysis:	No supervision by management in monitoring on worker payment for working on public holiday due to new changes person in charge.
Corrective Actions:	Management need to check and pay all workers data on working on public holiday.  Appoint person incharge to ensure all contractor workers received payment for working on public holiday
Assessment Conclusion:	The correction and corrective action plan are accepted. Verification of evidence of effective implementation shall be carried out in the next surveillance assessment.

	Noteworthy Positive Comments		
	1	Positive comments from all stakeholders interviewed	
Γ	2	All personnel were cooperative during the assessment process	

### 3.3 Status of Nonconformities Previously Identified and OFI

Major Nonconformities:			
Ref: 1849591-201906-M1	Area/Process: Belitong POM and Supply Base	Clause: MSPO Part 3, 4.3.1.1	
	Issue Date: 14/11/2019	Close Date: 12/2/2020	
Requirements:	Evidence of compliance with relevant legal requi	rements shall be available.	
Statement of Nonconformity:	All operations are in compliance with the application international laws and regulations.		
Objective Evidence:	In Bukit Tongkat B Estate, it was found that a worker [employee ID: FW06010020] received his pay for month January 2019 and June 2019 under minimum wage (RM1,100/month or RM42.31/day) i.e. RM668.42/25 working days or RM26.74/day and RM834.54/20 working days or RM41.28/day, respectively. Warning letters were given to the worker due to low productivity on 3, 11 and 16 January 2019. However, there is no evidence that the management has identified the root cause of his low productivity and further action taken for both months in order to comply with Minimum Wage Order 2018.		
Corrections:	The management failed to provide adequate planning and work during the low production period.		
Root cause analysis:	Management expand the job scope and gave extra work to the related workers in order comply with minimum wages act.		
Corrective Actions:	Provides annual training programs for related job scope to the specific workers/ responsible personnel.		
Assessment Conclusion:	Evidence submitted:		
- January 2020 payslip of the affected worker that shows the fulfilled		that shows the minimum wage was	
	- "Program Kerja" (work programme) for 2020 that shows the scope of job for workers can be expanded when necessary		
The corrective action evidence found to be adequate to close the effective implementation shall be verified in the next assessment.			



Verification Statement	The evidences verified found adequate and effectively implemented. Thus, the Major
	NC was remained closed.

Major Nonconformities:			
Ref:	Area/Process: Belitong POM and Supply	Clause: MSPO Part 3, 4.4.4.2	
1849591-201906-M2	Base		
	Issue Date: 14/11/2019	Close Date: 12/2/2020	
Requirements:	The occupational safety and health plan shall 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 Labelling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.		
Statement of Nonconformity:	No evidence re-designation of work being confinding.	nducted as per Medical Surveillance	
Objective Evidence:	At Bukit Tongkat Estate, based on medical surveillance (HQ/11/DOC/00/235) dated 16th February 2019, two manuring workers, FW 066010022 and FW 01950478 was found unfit for work due to abnormal chest x -ray and elevated creatinine level. However, their work assignment still remain status quo based on the pay-slip as at July and August 2019.		
Corrections:	The unfit workers have been transferred to other works that does not involve the use of chemicals and fertilizers (Bukit Tongkat B)		
Root cause analysis:	Management weaknesses regarding to the OSH Requirement in Medical Surveillance.		
Corrective Actions:	Appoint person incharge for management to ensure the OSH Requirement & regular monitoring every 6 months by Person in charge & Regional SHO. One of PIC's task is to inform the management of any "unfit worker" when identified.		
Assessment Conclusion:	Evidence submitted:		
	- Copies of letter from the Estate Manager to the notify them that their works have been changed chemical. The letters were acknowledged by the theoretive action evidence found to be adequeffective implementation shall be verified in the	ged to the works that do not involve ne workers through signatures. uate to close the NCR. The continuous	
Verification Statement	The evidences verified found adequate and effectively implemented. Thus, the Major NC was remained closed.		

Major Nonconformities:				
Ref: 1849591-201906-M3	Area/Process: Belitong POM and Supply Base  Clause: MSPO Part 3, 4.5.3.2			
	Issue Date: 14/11/2019 Close Date: 12/2/2020			
Requirements:	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			
Statement of Nonconformity:	Scheduled waste has exceeded the 180 days validity period.			



Objective Evidence:	Bukti Tongkat B Estate already exceeding the validity period as stipulated in the Environmental Quality Act 1974 (Act 127).  "Environmental Quality (Scheduled Wastes) Regulations 2005; PU(A) 294/2005; Regulation 9-Storage of Scheduled Wastes; No.5 – Any person may store schedule wastes generated by him for 180 days or less after its generation provided that:  1. The quantity of scheduled wastes accumulated on site shall not exceed 20 metric tons; and" As evidence;			
		Date	Date	Difference
	C) A / 400	Generated	Disposed	Days
	SW 409	28/2/2019, 0.001 Mt		258
Corrections:	Due to low volume of schedule waste generated, estate decided to dispose waste at the KS Belitong.			
Root cause analysis:	Management weaknesses in monitoring and managing wastes of scheduled waste materials either from the project or contractors.			
Corrective Actions:	Management to ensure all schedule waste item and Used PPE produced handled according to the waste management plan by regular monitoring every 6 months by regional SHO and thru periodic OSHA meeting.			
Assessment Conclusion:	Evidence submitted:			
	- A copy of inventory records (5th Schedule) that shows the scheduled wastes kept are not exceeding 180 days and sent to the centralised collection centres as decided by the top management in FGV			
	The corrective action evidence found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment.			
Verification Statement	The evidences verified found adequate and effectively implemented. Thus, the Major NC was remained closed.			

Major Nonconformities:				
Ref: 1849591-201906-M4	Area/Process: Belitong POM and Supply Base	Clause: MSPO Part 4, 4.3.1.1		
	Issue Date: 14/11/2019	Close Date: 12/2/2020		
Requirements:	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.			
Statement of Nonconformity:	Evidence of legal compliance was not adequately demonstrated.			
Objective Evidence:	<ol> <li>Audiometry Test was conducted on 16th October 2018 to 35 employees. Two workers namely, En Asmadi bin Amat (71XXXX-XX-5081) and En. Parizan bin Abd Kadir (77XXXX-XX-6807) was under Standard Threshold Shift. No evidence, re-test being conducted within three months from the date of the last audiometric test [ref.: Factories And Machinery Act 1967 [Act 139] P.U. (A) 1/1989 Factories and Machinery (Noise Exposure) Regulations 1989, Regulation 23]</li> <li>In Belitong POM, there was a female worker (Worker ID: 1210638) has worked overtime on 30/06/2019 from 2215 to 0045 (2.5 hours) which is after 10 p.m. However Belitong POM didn't have the permit from the Labour Department for female working after 10 p.m.</li> </ol>			



Corrections:	3) The workers housing weekly inspection was not conducted on weekly basis.  Based on the inspection report, the dates of the inspection are as follows:  - Last: 11/11/2019  - 2nd last: 24/9/2019  - 3rd last: mid-Aug 2019  1. Mill to apply the permit mentioned.  2. Mill to conduct retest for 2019 audiometric test to the specific workers Asmadi and Parizan.
	3. Mill to appoint several workers that in charge to do housing inspection every week
Root cause analysis:	Management weaknesses regarding to the Legal Requirement.
Corrective Actions:	1) Appoint person incharge for management to ensure the Legal & OSH Requirement. Do regular monitoring every 6 month by Person in charge.
	2) Letter of appointment to workers as Person in Charge for housing inspection.
Assessment Conclusion: Evidence submitted:	
	- A copy of OHD report on audiograme test dated 12/10/2019 for 70 mill employees which includes the two concerned employees. The results showed no hearing impairment detected.
	- A letter dated 26/12/2019 from the mill manager to the female employees to notify them that working after 10.00 p.m. is no longer allowed.
	- A letter dated 30/12/2019 from the mill manager to two employees to notify them to conduct the weekly housing inspection which includes the inspection program.
	The corrective action evidence found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment.
Verification Statement	The evidences verified found adequate and effectively implemented. Thus, the Major NC was remained closed.

Minor Nonconformities:				
Ref: 1849591-201906-N1	Area/Process: Belitong POM and Supply Base	Clause: MSPO Part 3, 4.5.3.5		
	Issue Date: 14/11/2019	Close Date: 8/3/2021		
Requirements:	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.			
Statement of Nonconformity:	Domestic wastes was not effectively managed.			
Objective Evidence:	During site visit at Bukit Tongkat B workers housing, it was found out that domestic wastes were disposed behind Block Seri Alamanda & Dahlia. The drain behind the toilet of Dahlia was also full of wastes.			
Corrections:	To conduct domestic waste cleaning programme/ communal work at residential areas that has been identified.			
Root cause analysis:	Weekly inspection for line site inspection by management not all covered. No monitoring on domestic waste management and no awareness on domestic waste for workers			
Corrective Actions:	1) Provide a complete checklist that covered surroundings and in the residential			



	building		
	2) Management to conduct awareness on domestic waste management to workers every year		
Assessment Conclusion:	As per line site visit verification and weekly inspection found the corrective action evidence found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment.		
Verification Statement	Verification on line site at Ulu Belitong Estate and Mill workers housing the management on domestic waste was properly manage thus minor NC was close accordingly.		

### 3.4 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1696075-201804-N1	Minor	18/10/2018	Closed on 14/11/2019
1849591-201906-M1	Major	14/11/2019	Closed on 12/2/2020
1849591-201906-M2	Major	14/11/2019	Closed on 12/2/2020
1849591-201906-M3	Major	14/11/2019	Closed on 12/2/2020
1849591-201906-M4	Major	14/11/2019	Closed on 12/2/2020
1849591-201906-N1	Minor	14/11/2019	Closed on 8/3/2021
2002762-202012-M1	Major	17/12/2020	Closed on 8/3/2021
2002762-202012-M2	Major	17/12/2020	Closed on 8/3/2021
2002762-202012-M3	Major	17/12/2020	Closed on 8/3/2021
2002762-202012-N1	Minor	17/12/2020	Open
2002762-202012-N2	Minor	17/12/2020	Open

### 3.5 Issues Raised by Stakeholders

Stakeho	Stakeholders comment		
1	Feedbacks:		
	Workers' Representative – He informed that he has attended regional meeting with the management to discuss the company's direction such as related to increment and bonus for Year 2020. He has informed all the workers on this matter. There is no grievance from workers. Wages are paid according to Minimum Wage Order 2020.		
	Management Responses:		
	The management noted and will continue to ensure the workers' welfare and benefit will be taken care.		
	Audit Team Findings:		
	No other issue.		
2	Feedbacks:		



Workers (India & Indonesia) – They informed that they have paid an amount of money to the agent in their home country. Details refer to Indicator 6.6.2. They have signed contract in home country and in Malaysia. Both the contracts are having the same terms and conditions as agreed in home country. Induction training was provided to them and they kept the passport by themselves. They informed that the management treated all the workers with fair and no discrimination. They have been paid accordingly to Minimum Wage Order 2020.

#### **Management Responses:**

The management has acted and in progress to control the agents in source country. They will ensure the workers are treated equally.

#### **Audit Team Findings:**

Details refer to Indicator 6.6.2.

#### 3 Feedbacks:

SK LKTD Ulu Penggeli - Suggestion to conduct awareness to student in school regarding to Palm oil industry and the process in the operation in term education purpose. So far they receive good cooperation and relationship with FGV management. The CSR programme mainly come from FELDA.

#### **Management Responses:**

Information noted

#### **Audit Team Findings:**

No further issue.

#### 4 Feedbacks:

SK Bukit Tongkat – Until today they receive good cooperation and relationship with FGV management. The CSR programme mainly come from FELDA.

#### **Management Responses:**

Information noted

#### **Audit Team Findings:**

No further issue.



#### **Section 4: Assessment Conclusion and Recommendation**

### Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings

Based on the findings during the assessment *Belitong POM and Supply base* Certification Unit complies with the *MS 2530-3:2013* and *MS 2530-4:2013*. It is recommended that the certification of *Belitong POM and Supply base* Certification Unit is approved and/or continued.

Acknowledgement of Assessment Findings	Report Prepared by
Name:	Name:
Norolsaiful Hazri bin Hamid	Muhamad Naqiuddin Mazeli
Company name:	Company name:
FGV Holdings Berhad	BSI Services (M) Sdn Bhd
Title:	Title:
Sustainability Manager	Lead Auditor
Signature:	Signature:
<b>Date:</b> 30 April 2021	Date: 19/4/2021



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

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

Criterio	on / Indicator	Assessment Findings	Compliance
4.1 Prin	4.1 Principle 1: Management commitment & responsibility		
Criterio	n 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy		
4.1.1.1	A policy for the implementation of MSPO shall be established.  - Major compliance -	FGV Holdings Berhad has established Group Sustainability Policy, approved by the Board of Directors dated 17/11/2020. Refer policy no. FGV/SED/POL/001, rev. 3.0.  The policy covers all sustainability aspects as stated under section 5. Policy as follows:  1. Promoting economic growth  1.1. Enhancing livelihood  1.2. Profitability and efficient use of resource  1.3. Obligation of value chain partners  2. Respecting human rights  2.1. Equality and non-discrimination  2.2. Upholding labour standard  2.3. Respecting rights of indigenous peoples and local communities  2.4. Health and safety  2.5. Preventing harassment and abuse	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
		<ol> <li>Protecting the environment</li> <li>3.1. Efficient use of natural resource</li> <li>3.2. Managing environmental impacts</li> <li>3.3. No deforestation and planting on peat</li> <li>3.4. Protect high biodiversity value (HBV) and High Conservation Value (HCV) areas</li> <li>3.5. Limitations on the use of hazardous chemicals and agrochemicals</li> <li>3.6. No open burning/use of fire</li> <li>3.7. Water management</li> <li>3.8. Waste management</li> <li>3.9. Addressing climate change</li> <li>4. Monitoring and implementation'</li> <li>4.1. Transparency and reporting</li> <li>4.2. Grievances management</li> <li>4.3. Traceability and supply chain</li> </ol>	
4.1.1.2	The policy shall also emphasize commitment to continual improvement.  - Major compliance -	Sighted under Group Sustainability Policy stated FGV Group is committed to continuously improve its products and services by adopting the best possible approaches to enhance productivity and profitability by optimising resources and operational efficiencies, while minimising negative impacts on people, social and environmental.	Complied
Criterio	<b>4.1.2</b> – Internal Audit		



Criterio	on / Indicator	Assessment Findings	Compliance
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.  - Major compliance -	FGV Group has established SOP for Internal Audit and documented in Internal Audit Procedure, document no. FGV/ML-1A/L2-Pr11, issue 0, version 0 dated 1/6/2016.  As stated in the SOP established, the internal audit were scheduled at minimum of once a year.  FAS Ulu Belitong  Latest internal audit was conducted on 18 – 19/10/2020 by 2 internal auditor from Sustainability Compliance and Certification Department.  FGVPM Bukit Tongkat B  Latest internal audit was conducted on 18 – 19/11/2020 by 2 internal auditor from Sustainability Compliance and Certification Department.	Complied
4.1.2.2	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.  - Major compliance -	FAS Ulu Belitong Latest internal audit was conducted on 18 – 19/10/2020. 23 Nonconformity were issued during the internal audit. Corrective action plan has been established was submitted and accepted to the Internal Auditor on 9/12/2020.  FGVPM Bukit Tongkat B Latest internal audit was conducted on 18 – 19/11/2020. 41 Nonconformity were issued during the internal audit. Corrective action plan has been established was submitted and accepted to the Internal Auditor on 4/12/2020. Sighted the Corrective action submitted to the Internal Audit Team.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.1.2.3	Report shall be made available to the management for their review.  - Major compliance -	The internal audit report was documented and made available for management review. As evidence, all findings from internal audit was responded by Mill Management within the timeframe stipulated in the Audit Procedure.	Complied
Criterio	n 4.1.3 – Management Review		
4.1.3.1	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.  - Major compliance -	Management review was conducted at minimum of once a year. Among the agenda discuss in the meeting as follows:  1. Audit result  2. Customer satisfaction  3. Production  4. Environmental  5. Social  6. Management Review  7. Continuous Improvement Plan Latest management review was conducted for both estates visited as follows:  - FAS Ulu Belitong: 4/12/2020  - FGVPM Bukit Tongkat B: 25/11/2020	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
Criterio	n 4.1.4 — Continual Improvement		
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.  - Major compliance -	The estates visited has established continual improvement plan covers the main social and environmental impacts.  Continual improvement plan for the mill being strategized under the following programme as follows:  1. Planting of beneficial plant 2. Appropriate management of empty chemical container 3. Effectiveness usage of paper 4. Gotong Royong Perdana 5. Yassin reading ceremony 6. Recreational activities 7. Increase company income	Complied
4.1.4.2	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.  - Major compliance -	Any new technology and/or innovation equipment is subject to approval by Headquarters.  Any new information is updated to employees through morning briefings, memo, meetings, station training. So far, no new technology at both estates visited.	Complied
4.1.4.3	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 established.  - Major compliance -	Any new technology and/or innovation equipment is subject to approval by Headquarters.  Any new information is updated to employees through morning briefings, memo, meetings, station training. So far, no new technology at both estates visited.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.2 Prin	ciple 2: Transparency		
Criterion	4.2.1 – Transparency of information and documents relevant	to MSPO requirements	
4.2.1.1	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.  - Major compliance -	Adequate information covering on environmental, social and legal issues which are relevant to stakeholders is shared for effective participation and decision making. Handbook of RSPO Certification for FELDA and FGV were distributed to all the stakeholders. Explanation of RSPO, MSPO, ISCC and all the policies were clearly stated in the handbook. Besides, process of complaints and grievances were included in the handbook.	Complied
4.2.1.2	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.  - Major compliance -	Ulu Belitong Estate holds copies of each of the management documents that are required to be publicly available. Last communication was on 8/12/2020 to all stakeholder regarding to document that publicly available.  Besides, all the information such as annual report, sustainability news and policies were found available in the company's website: www.fgvholdings.com.	Complied
Criterio	n 4.2.2 - Transparent method of communication and consult	tation	
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders.  - Major compliance -	FGV has developed "Komunikasi, Penglibatan dan Rundingan" procedure (Doc. No. ML-1A/L2-PR3(1) dated 22/5/2015) where the procedure has stated the information that provided to the stakeholders such as policies, social impact assessment and environment aspects. FGV has conducted a combined stakeholder meeting on 24/5/2018 for Felda Ulu Belitong. During the meeting, the management has explained the requirements of sustainable palm oil certification to all the stakeholders. Besides, briefing of policies	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		and management procedures of sustainability was carried out during the meeting as well. Latest record briefing handle was on 2/3/2020 for Grievances and communication procedure also 22/1/2020 on Group Sustainability Policy.	
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.  - Minor compliance -	Management of the Ulu Belitong Estate and have been appointed as management official to communicate any social matters in the mill reported by stakeholders. Appointment letters (11)810630001-2020/01/01 dated 24/1/2020 respectively were seen. For Bkt Tongkat B estate, they appointed Khairuddin Ab Halim as Social and Communication representative as per letter (01)(E6.2.1) Pegawai Bertanggungjawab dated 1/1/2020.	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.	Stakeholder lists were last updated on 22/1/2020 for both Ulu Belitong estates, where internal and external stakeholders have been included.	Complied
	- Major compliance -	Stakeholder meeting was last conducted on 24/5/2018 with the participation of internal and external stakeholders such as government authorities, NGOs, contractors and local communities. Requests or enquiries raised during the meeting was responded by the management and recorded in the minutes.	
Criterio	n 4.2.3 – Traceability		
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).	Manual Ladang Sawit Lestari, 8.0 Mengangkut BTS ke Kilang [MLSL (Ed.3) – Sec.4 (8.0), 1/9/2017] has been established to provide guideline on delivery of FFB to the mill. Among the documents & records found to be maintained were:	Complied
	- Major compliance -	<ul><li>Nota Penghantaran BTS</li><li>Slip Akuan Penerimaan (weighbridge ticket)</li></ul>	



Criterio	on / Indicator	Assessment Findings	Compliance
		<ul> <li>Slip Grading</li> <li>Sijil Mutu BTS</li> <li>Apart from that, there is also a Traceability procedure entitled "Traceability" [doc. No.: FGVPM/TRACEABILITY/LDG/01, dated 2/1/2020.</li> </ul>	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system.  - Major compliance -	Various means were available on how to monitor the traceability where among others the updating of FFB delivery records, through month end account closing and internal audit. Based on the records of FFB delivery, it was found that the procedure of traceability was well implemented.	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system.  - Minor compliance -	The Assistant Managers are assigned to implement and maintain the traceability system, e.g. Mr. Mohd Firdaus Ibrahim [ref.: appointment letter from Estate Manager dated 4/2/2020 (ref.: (05) 820630001/2020/E6.2.1] dated 4/2/2020 for Ulu Belitong Estate.  In Bkt Tongkat B the appointment letter for Hasbi Mamat	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained.  - Major compliance -	(03)(E6.2.1) Pegawai bertanggungjawab dated 20/2/2020.  Verification of the records and documents mentioned in 4.2.3.1 showed that the deliveries of FFB were well maintained. Crosschecking between the daily FFB delivery records and the transportation documents showed that the records were accurate and well maintained as per below:-	Complied
		Date: 2/11/2020 Delivery note no: 0982	



Criterio	on / Indicator	Assessment Findings	Compliance
		Lorry no: JSE 1677	
		Net Weight: 7.57 mt	
		Estate: Ulu Belitong(PKT 3)	
		Date: 1/1/2020 Delivery note no: 0424	
		Lorry no: JSE 1677	
		Net Weight:4.27 mt	
		Estate: Ulu Belitong (Pkt 1)	
4.3 Prin	ciple 3: Compliance to legal requirements		
Criterio	n 4.3.1 – Regulatory requirements		
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.  - Major compliance -	Compliance to each applicable law and regulation is monitored by the operating units. Sighted the sampled evidence of compliancy to the regulation as follows:	Major Non- Conformity
	Plajor compilance	FAS Ulu Belitong  1. MPOB License no. 50354092000. Validity period from 1/9/2020 - 31/8/2021	
		2. Salary deduction permit for water, electricity, medical fees that exceeded limit and other advance permit with ref. no. (22)dlm BHG. PU/9/129 Jld 23 dated 26/4/2016 and Serial No. PP3/34/0351 dated 15/9/2000	



Criterion / Indicator	Assessment Findings	Compliance
	FGVPM Bukit Tongkat B:  1. MPOB License no. 558895002000. Validity period from 1/3/2020 - 28/2/2021  2. Diesel permit no B.PGK. JH (KLU) 2303 SK Valid from 20/2/2020 till 1/2/2021  Zaidan Joyoo Enterprise on FFB transportation. From the sample workers were: - 8xxxxx-01-xx97 8xxxxx-01-xx49 a) found under November 2020 payslip for both no double payment for working on rest day on 6/11/2020 and 13/11/2020 as per November Payslip and 'Rekod Harian Pekerja' verification not comply with Section 60(3)(d) under Employment Act 1955. b) Sighted no SOCSO deduction from wages for Zaidan Joyoo Enterprise workers as per verification on payslip on Jan, July and November 2020 not comply with Section 7 under Employees Social Security Act 1969. The management will be subsidized RM 4 for water bill and RM 6 for electricity every month to all workers a per the employment contract. However, sampled the payslips for July 2020 found that some of workers did not receive the subsidies for electricity. The sampled workers as below:- Employee No:- FW06010155, FW06010157, FW06010158, FW06010134	



Criterion / Indicator		Assessment Findings	Compliance
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register.  - Major compliance -	The applicable laws identified were listed in Register of Legal and Other Requirements (Daftar Perundangan dan Lain-lain Keperluan), document no. FGV/FGVPM/IV/IMS/15/2.1.  The sample of Act and Legal as listed as follows:  1. Infectious Disease Prevention and Control Act 1988  2. Occupational Safety and Health 1994, Noise Regulation 2019  3. National Salary Consultative Council Act 2011, Act 732, (Minimum Wage Order 2020)  4. Labour Act 1955  5. Minimum housing standard and amenities (amendment) 2019, Act 446  Latest review was conducted on 20/5/2020.	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.  - Major compliance -	The mechanism of tracking changes and update are guided by procedure on Legal and Other Requirements (Pematuhan Undang – Undang dan Keperluan Lain), document no. FGV/ML-1A/L2-Pr6, issue 1, ver. 0 dated 1/6/2016.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.  - Minor compliance -	Group Sustainability will update the operating regarding any changes on applicable laws to the operating units. The person responsible appointed at the operating units will update the changes in the Legal Register  FAS Ulu Belitong  The estate appointed the Field supervisor as person responsible for tracking changes in regulatory requirements as per appointment	Complied



Criterion / Indicator		Assessment Findings				Compliance
		ketter with ref. no. (11)820630001/20/TKL-BB dated 15/1/2020 signed by the Estate Manager.				
		FGVPM Bukit Tongkat B				
		tracking changes ketter with ref. no	nted the Field supervision regulatory require (02)(E6.2.1) Pegavoy the Estate Manager	ements as per wai bertanggung	appointment	
Criterio	n 4.3.2 – Lands use rights					
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.  - Major compliance -	agreement was sig and Felda Agricul expired on 31/1 korporat/External	state, the total hectargned between Federal tural Services Sdn B 2/2017. As per let dated 14/6/2019, new Belitong estate with below:-  Hectarage  99.15  48.55  9.42	l Land Developm hd dated 7 Feb ter (18)820101 w rental agreem	ent Authority 2017 which .013/khidmat ent has been	Compilea
	Bukit Tongkat B Estate holds total 11 land titles (under FELDA) wh they leased from FELDA for approximately 826.4079 Ha for 99 year Another 8 land was under agreement between FGV and Fe					



Criterion / Indicator		Assessment Findings	Compliance
		Agriculture Services Sdn Bhd. with total 444.00 ha. Declaration for certified area was 1237.85 ha after deduction land acquisition by Government with total 4.67 ha.	
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.  - Major compliance -	For Ulu Belitong estate, the total hectarage is 138.49 ha. The rental agreement was signed between Federal Land Development Authority and Felda Agricultural Services Sdn Bhd dated 7 Feb 2017 which expired on 31/12/2017. As per letter (18)820101013/khidmat korporat/External dated 14/6/2019, new rental agreement has been established for Ulu Belitong estate with new total hectarage 157.12 Ha valid from 1/1/2020 until 30/12/2020.	Complied
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.	Legal boundary for both estate were clearly demarcated and visibly maintained.  FAS Ulu Belitong	Complied
	- Major compliance -	The estate clearly demarcated the legal boundary with fences as sighted at field Peringkat 1 block 10 adjacent with FELDA settlers housing area and FGVPM Bukit Tongkat.	
		FGVPM Bukit Tongkat B	
		The estate clearly demarcated the legal boundary with fences as sighted at field PM 10H adjacent with FELDA Bukit Tongkat and PM 00H and PM 14N adjacent with Kluang Forest Reserve.	
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	There is no land dispute in the Ulu Belitong Certification Unit at the time of audit. The lands are belonged to Lembaga Kemajuan Tanah Persekutuan via verified with the land titles. Interview with the stakeholders confirmed that no encroachment of land by certification unit.	Complied



Cuitouion / Indicatou				
Criterion / Indicator		Assessment Findings	Compliance	
	be made available and that these should have been accepted with free prior informed consent (FPIC).			
	- Minor compliance -			
Criterio	n 4.3.3 – Customary rights			
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.	monstrate that these rights are understood and are not certification unit.		
	- Major compliance -			
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available.	There is no land encumbered by customary rights under Belitong certification unit.	Complied	
	- Minor compliance -			
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.	There is no land encumbered by customary rights under Belitong certification unit.	Complied	
	- Major compliance -			
4.4 Prin	ciple 4: Social responsibility, health, safety and emplo	oyment condition		
Criterio	n 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.	SIA was conducted on 23/1/2018 by Certification & Due Diligence Department for Ulu Belitong Estate and Bukit Tongkat B Estate. Stakeholders such as workers, contractor, and external stakeholders	Complied	
	- Minor compliance -	were participated in the assessment. Positive and negative impacts have been recorded in the SIA Management Plan dated 1/9/2020. On changes min wages followed as per Min wages 2020 act, the		



Criterion / Indicator		Assessment Findings	Compliance
		management already inform their workers regarding to changes dated 30/3/2020.	
Criterio	n 4.4.2: Complaints and grievances		
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented.  - Major compliance -	FGV has developed procedure of "Menangani Aduan dan Rungutan" (Doc. No.: ML-1A/L2-Pr13(0), Version 0 dated 1/6/2016). The objectives of the procedure are to provide a channel for the internal stakeholders and external stakeholders to lodge any complains to the management. Mechanism to handle complaints was clearly described in the procedure. There are 5 stages of process for internal complaint. The time frame for investigation of the issue should be done within 14 working days. Latest communication to stakeholder regarding to compliant and grievances was on 8/12/2020.	Complied
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.  - Major compliance -	The estates are using Complaint Form for external stakeholder and Complaint Book to record complaints and requests reported by the internal workers. There was no complaint received from external stakeholders for both estates.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.  - Minor compliance -	The estates are using Complaint Form for external stakeholder and Complaint Book to record complaints and requests reported by the internal workers. There was no complaint received from external stakeholders.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.  - Minor compliance -	Interview with the internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure and they were briefed by the management during stakeholder meeting.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.  - Major compliance -	The estates are using a form i.e. Borang Permohonan Pembaikan Asrama and Borang Kerosakan & Pembaikan Rumah Kakitangan/Pejabat/ Asrama/ Stor at Ulu belitong estate respectively. The past 24 months records of complaint were still available for verification in Bukit Tongkat B estate issue dated on 16/10/2020 (wasps nest removal) and response was on 18/10/2020.	Complied
Criterio	n 4.4.3: Commitment to contribute to local sustainable develo	opment	
4.4.3.1	Growers should contribute to local development in consultation with the local communities.  - Minor compliance -	Among the contribution to local development made by the estates were:  • Job opportunity for surrounding communities • Monetary donation for nearby schools upon request  Sampling as per below:-  CSR to workers, to give CSR Donation dated 25/3/2020 with total RM 923.00 (in bulk contain rice, Maggie, biscuit and coffee)  On 26/4/2020 management donate bubur lambuk donation with total RM 150.00  In Bkt Tongkat B, as per record already give CSR donation Food Supply for Covid-19 dated 26/3/2020 with total RM 4060.00	Complied
Criterio	n 4.4.4: Employees safety and health		
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.	FGV Holding Berhad has documented safety and health policy in the Group Sustainability Policy, approved by the Board of Directors dated	Complied



Criterion / Indicator	Assessment Findings	Compliance
- Major compliance -	17/11/2020. Refer policy no. FGV/SED/POL/001, rev. 3.0. under section 5.2.4: Health and Safety.	
	In the policy stated the commitment:	I
	1. Providing a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of FGV facilities. This commitment also applies in situations where any public health concern arises in FGV facilities	
	2. FGV group shall ensure that all health and safety plan is documented, communicated and implemented	
	3. FGV group shall allocate appropriate resources in order to minimize and eliminate health and safety risk	
	The estates visited has established the Safety and health Plan FY 2020. The plan was reviewed on annually basis. Sighted the sampled implementation of the management plan as follows:	
	FAS Ulu Belitong	I
	1. Workplace inspection was conducted one week before Safety and Health committee meeting. Sighted the inspection report dated 21/5/2020 and 9/9/2020.	
	2. Latest medical surveillance was conducted on 26/11/2019. 2 workers involved in chemical handling were send for surveillance and found fit to work. As recommendation in CHRA report no. HQ/17/ASS/00/0002-2019/052/006, medical surveillance was to be conducted yearly. Medical surveillance FY 2020 was scheduled 18/9/2020. However, due to COVID-19 issue, the doctor postponed the surveillance as per communication email between the OHD and the estate.	



Criterio	on / Indicator	Assessment Findings	Compliance
		3. The estate conduct employee motorcycle monitoring on quarterly basis. Sighted the monitoring records dated 7/12/2020 and 12/8/2020.	
		<ol> <li>FGVPM Bukit Tongkat B</li> <li>Latest medical surveillance was conducted on 27/9/2019 by OHD with reg. no. HQ/11/DOC/00/235 as per report dated 2/2/2020. 16 workers were sent for surveillance and found fit to work. FY 2020, medical surveillance were scheduled in December as per communication email dated 17/12/2020.</li> <li>The estate monitor the first aid box on monthly basis. Sighted the</li> </ol>	
		the monitoring records FY 2020 dated 20/2/2020, 14/5/2020 and 3/11/2020.  CHRA was conducted on 29/9/2020 as per report no. JKKP HQ/10/ASS/00/8 2020/078 by registered OHD with reg. no. JKKP HQ/10/ASS/00/8.	
4.4.4.2	<ul><li>The occupational safety and health plan shall cover the following:</li><li>a) A safety and health policy, which is communicated and implemented.</li><li>b) The risks of all operations shall be assessed and documented.</li><li>c) An awareness and training programme which includes the</li></ul>	FGV Holding Berhad has documented safety and health policy in the Group Sustainability Policy, approved by the Board of Directors dated 17/11/2020. Refer policy no. FGV/SED/POL/001, rev. 3.0. under section 5.2.4: Health and Safety.  The policy was communicated through training, briefing and displayed on notice board at several placed in the estates.	Complied
	c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:	. ,	



Criterion / Indicator	Assessment Findings	Compliance
i. all employees involved shall be adequately trained on safe working practices	Keselamatan Kesihatan Pekerjaan dan Alam Sekitar". Refer document no FGVPM/L2/PP-01.	
ii. all precautions attached to products shall be properly observed and applied	Health and safety issue assessment has been documented in hazard identification, risk assessment and risk control HIRARC. The	
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).	assessment include all processing activities and support activities base on workstation. All activities with significant risk has been listed and mitigation plan to improve the condition has been established and documented. The document was reviewed at	
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.	minimum once a year or once accident occur.  FAS Ulu Belitong  Latest HIRARC Review was conducted on 1/1/2020. No changes made to the register from due to no accident and changes made to the operation.	
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.  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.  h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.	FGVPM Bukit Tongkat B  Latest HIRARC Review was conducted on 25/2/2020. No changes made to the register from due to no accident and changes made to the operation.  The pesticides handlers have been given appropriate training before handling pesticides including pesticides operators and chemical store keeper. Sighted the training records for pesticides handlers:  FAS Ulu Belitong  Scheduled Waste management training dated 28/10/2020 and 23/10/2020	



Criterion ,	/ Indicator	Assessment Findings	Compliance
i)	1	Butik (rat bait) and IPM training dated 12/4/2020	
	operations. A First Aid Kit equipped with approved contents should be available at each worksite.	Weeding SOP and PPE awareness dated 4/2/2020	
j)	Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.	Chemical premixing and triple rinsing training dated 3/2/2020	
-	Major compliance -	FGVPM Bukit Tongkat B	
		Spraying SOP training dated 10/2/2020	
		Chemical store management dated 6/4/2020	
		Rat Baiting training dated 8/4/2020	
		PPE were provided to the workers appropriately to the work. Noted during interview with harvester, they were provided with wellington boots, garden gloves, safety helmets and sickle covers.	
		Noted during interview with the sprayers at Estate, they have been provided with PPE such as glove, goggle, boots and apron.	
		FAS Ulu Belitong	
		Sighted the PPE records for workers recorded in PPE Issue form and PPE return forms dated 8/1/2020, 20/2/2020 and 11/6/2020.	
		FGVPM Bukit Tongkat B	
		Sighted during interview, the sprayers were provided with appropriate PPE such as safety helmet, safety goggle, nitrile gloves, and apron and wellington boots. Sighted the PPE issued for workers with employment no. FW 19507xx, FW 010100xx	



Criterion / Indicator	Assessment Findings	Compliance
	FGVPM has established SOP for Chemical Handling and documented in the Safety Operating Procedure, Chemical Handling. Refer doc no. FPI-PK-036, issue no. 3 dated 14/7/2018.	
	FAS Ulu Belitong	
	FAS has appointed the manager as person responsible for safety and health as per appointment letter no. (11)HSE/B/02 dated 2/1/2020 signed by Caretaker R&D Division. The management was also appointed employer and employee representatives.	
	FGVPM Bukit Tongkat B	
	FGVPM has appointed the Estate Manager as responsible person and chairman for safety and health committee as per QOHSE Manual Procedure FPI/L2/QOSHE 4.0 and appointment letter no. 38/9520/HSE/FGVPM/WM/2019 dated 1/4/2019 signed by General Manager Mesing Zone.	
	All safety, health and welfare issue been discussed during OSH committee meeting. The meeting was on quarterly basis. Sighted the minutes meeting for OSH committee for FY 2020 at both estate visited:	
	FAS Ulu Belitong	
	Meeting Date	
	1 1/6/2020	
	2 18/9/2020	



Criterion / Indicator	Assessment Findings	Compliance
	FGVPM Bukit Tongkat B	
	Meeting Date	
	1 25/2/2020	
	2 18/5/2020	
	3 10/8/2020	
	4 5/11/2020	
	FGVPM has established in OSH Management Procedure – Emergency Preparedness and Response. Ref doc no. FGVPM/L2/PP-08.	
	The estates visited has established emergency procedures for incident of fire, minor and major accident, animal attack and chemical spillage. The procedure is written in Bahasa Malaysia an available at the office and displayed at the OSH notice board for review.Interview with workers during site visit shows the understanding of the emergency procedures. Latest ERP training was conducted on 7/8/2020 for FAS Ulu Belitong and 5/3/2020 for FGVPM Bukit Tongkat B.	
	Estate visited has trained employee for first aid training and appointed the trained first aider to be present at all workstation. Noted during interview with mandore and field supervisor show the understating to conduct emergency treatment if accident occurs in the field. Sighted the competence person certificate for first aider as follows:	
	FAS Ulu Belitong	
	FA29326/19/47417	



Criterio	n / Indicator	Assessment Findings	Compliance
		FA29304/19/47395	
		FA29315/19/47406	
		FA29312/19/47403	
		FGVPM Bukit Tongkat B	
		The estate has appointed the field supervisor and field mandore as first aider. Sighted the raining records dated 3/3/2020. Noted during interview with the spraying mandore, noted satisfactory understanding on the basic first aid treatment. The estate monitor the first aid box on monthly basis. Sighted the monitoring records FY 2020 dated 20/2/2020, 14/5/2020 and 3/11/2020.	
		Accident records are found to be updated. All records on Lost Time Accident (LTA) metrics are maintained.	
		Samples of accident statistic as shown below :	
		Year FAS Ulu Belitong FGVPM Bukit Tongkat B	
		2019 2 cases, LTA 4 0 cases, LTA 0	
		*LTA is equivalent to lost man days (MC)	
		Monthly accident report was send to the region SHE Department for compilation.	
Criterion	4.4.5: Employment conditions		
4.4.5.1	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The	The company established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 17/11/2020 where the company respects for the human rights. FGV is committed and support human rights.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	policy shall be signed by the top management and effectively communicated to the employees.  - Major compliance -	Communication to the employees was done in various methods such as briefing during morning muster, display on notice boards at workers' hostel and training. Interview with workers showed that they have a good understanding on human rights.	
4.4.5.2	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.  - Major compliance -	The company established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 17/11/2020 to support equal opportunity. The company is committed to ensure all the employees are treated equally regardless of race, nationality religion, gender, age and other political opinions. Interview with the workers showed that no discrimination is being practiced.	Complied
4.4.5.3	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.  - Major compliance -	FGV Plantations (M) Sdn Bhd has established an employment contract for its foreign workers. Pay and conditions are documented and are above the Minimum Wage Order 2020. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Sampled of the pay slips for the months of March, Oct and August 2020 (Ulu Belitong) confirmed that the workers were paid in accordance with Minimum Wage Order 2020. The sampled employees were:	Complied
		Ulu Belitong:  Emp. No.: PI001919016, PB001919022, PB001919017, PB001919023, PB001919015, PI001919027  Bukit Tongkat B:  Emp. No.: FW06010012, FW06010125, FW 06010155, FW 06010136, FW 0601057, FW 06010158, LW 01950129, LW 01950119	



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.5.4	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.  - Minor compliance -	In Zaidan Joyoo Enterprise and Masaki Ent, as per sampling in Bkt Tongkat B estate, Pay and conditions are documented and are above the Minimum Wage Order 2020. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Sampled of the pay slips for the months of Jan, July and Nov 2020 (Bkt Tongkat B estate) confirmed that the workers were paid in accordance with Minimum Wage Order 2020. The sampled employees were:  Zaidan Joyoo Enterprise  880822-01-5497  890117-01-5749  Masaki Enterprise  870902-23-5511  880412-01-5689	Complied
4.4.5.5	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.	All the recruited workers will be registered in the e-Rangkaian Maklumat Ladang (e-RML) where personal details such as name, nationality, date of employed, job description, wage rate, date of birth, gender and years of service was stated in the system.	Complied
	- Major compliance -		
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of	Employment Contracts were issued and acceptance of copied of employment contract were acknowledged by the workers. The terms and conditions were clearly stated in the employment contract such	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	employment contract is available for each and every employee indicated in the employment records.  - Major compliance -	as annual leave entitlement, benefits and medical leave. The sampled employment contracts are as follows:  Ulu Belitong: Emp. No.: PI001919016, PB001919022, PB001919017, PB001919023, PB001919015, PI001919027  Bukit Tongkat B: Emp. No.: FW06010012, FW06010125, FW 06010155, FW 06010136, FW 0601057, FW 06010158, LW 01950129, LW 01950119	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.  - Major compliance -	Sampling Estate is using "Rekod Kedatangan Roll Call" where the attendance of workers is recorded on daily basis. Overtime is recorded in "Kad Kerja" which is acknowledged by the workers and staff. Samples of employees' "Kad Kerja" are as follows:  Ulu Belitong:  Emp. No.: PI001919016, PB001919022, PB001919017, PB001919023, PB001919015, PI001919027  Bukit Tongkat B:  Emp. No.: FW06010012, FW06010125, FW 06010155, FW 06010136, FW 0601057, FW 06010158, LW 01950129, LW 01950119	Complied
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations	Records reviewed on the "Kad Kerja" of sampled workers found that the enter time and exit time was clearly stated in the time card. The	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.	sampled workers above have recorded overtime not exceeding 104 hours per month.	
	- Major compliance -		
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	Documented pay slip was distributed to individual workers on the day of payment. Wages and overtime were paid according to the "Kad Kerja". Total hours of overtime and daily attendance has recorded in the time card. The sampled workers' pay slips for Sep-Nov 2019 are	Complied
	- Major compliance -	as follows:	
		<u>Ulu Belitong:</u>	
		Emp. No.: PI001919016, PB001919022, PB001919017, PB001919023, PB001919015, PI001919027	
		Bukit Tongkat B:	
		Emp. No.: FW06010012, FW06010125, FW 06010155, FW 06010136, FW 0601057, FW 06010158, LW 01950129, LW 01950119	
		All of them above have achieved the Minimum Wage Order 2020. Hours of overtime has recorded in the pay slip as well.	
4.4.5.10	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.	The management has provided facilities such as mosque, recreational facilities such as futsal field, badminton court and volleyball court to the workers and dependents. Government clinic was available in the complex. The workers will be awarded with bonus once a year based on performance. Various incentive and	Complied
	- Minor compliance -	allowance were also given to the workers.	



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.5.11	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.  - Major compliance -	The workers in the estates have been provided with basic facilities such as government clinic, football field, mosque, sundry shops and other amenities such as electricity and water supply from government with subsidize. Weekly inspection was recorded in "Rekod Pemantauan Mingguan Kebersihan Asrama Pekerja" — last visit December 2020. To enhance the subject to check	Complied
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.  - Major compliance -	The company established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 17/11/2020. The company is committed to protect the rights of women on the reproductive and family planning. Discrimination is not allowed in the company. Apart from that, procedure "Menangani Aduan Melalui Jawatankuasa Wanita" (Doc. No.: FGV/ML-1A/L2-Pr14, Version 0 dated 1/6/2016) was developed to provide a system to channel the complaint regarding sexual harassment and violence. Gender committee was established in the estates to monitor and handle sexual harassment and violence case in the estate. There has been no case with regards to sexual harassment or violence reported. Latest Gender meeting conducted on 13/2/2020.	Complied
4.4.5.13	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.	The company established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 17/11/2020. The company allows the employees to join any legal association and get approval from the management. Workers' Committee at Belitong estate is maintained to discuss issues related to workers welfare through regular meetings.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -		
4.4.5.14	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 exposed to hazardous working conditions.	The company established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 17/11/2020 where the company will not recruit any individual who less than 18 years old to work in plantations. Document reviewed on the list of workers confirmed that all the employees were above 18 years old.	Complied
	- Major compliance -		
Criterion	4.4.6: Training and competency		
4.4.6.1	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.  - Major compliance -	The estates visited has established training program based on annual training need analysis conducted.  FAS Ulu Belitong  1. Sexual harassment briefing dated 24/11/2020  2. Scheduled Waste management training dated 28/10/2020 and 23/10/2020  3. Safety and health policy training dated 8/9/2020  4. Group sustainability policy training dated 17 – 18/8/2020  5. Whistle blowing and anti-bribery briefing dated 12/7/2020  6. Manuring SOP training dated 1/7/2020  7. Employment contract, permit, insurance and medical benefit	Complied
		dated 19/5/2020  8. Environmental conservation, prohibition of open burning and buffer zone and HCV area training dated 14/4/2020	



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.6.2	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.	<ol> <li>Butik (rat bait) and IPM training dated 12/4/2020</li> <li>Weeding SOP and PPE awareness dated 4/2/2020</li> <li>Chemical premixing and triple rinsing training dated 3/2/2020</li> <li>Tractor handling and maintenance training dated 9/1/2020</li> <li>FGVPM Bukit Tongkat B</li> <li>Fertiliser application training dated 5/2/2020</li> <li>Butik (rat bait) application training dated 8/4/2020</li> <li>Firefighting training dated 5/3/2020</li> <li>Tractor/Lorry and loader driver training dated 2/3/2020</li> <li>FFB harvesting training dated 15/1/2020</li> <li>Scheduled waste management training dated 23/4/2020</li> <li>Estates visited has conducted training need analysis and documented in Training Needs Assessment of estate worker. Training Plan has been established based on the training need analysis conducted.</li> </ol>	Complied
	- Major compliance -		
4.4.6.3	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.	The estates visited has training program which updated annually based on training need analysis. The training identified were programmed throughout the year.	Complied
	- Minor compliance -		



Criterion / Indicator		Assessment Findings	Compliance	
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services				
Criterio	n 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.  - Major compliance -	FGV Holding Berhad has documented environmental policy in the Group Sustainability Policy, approved by the Board of Directors dated 17/11/2020. Refer policy no. FGV/SED/POL/001, rev. 3.0. under section 5.3 Protecting the Environment.  The policy was communicated through training, briefing and displayed on notice board at several placed at the estate visited.	Complied	
4.5.1.2	The environmental management plan shall cover the following:  a) An environmental policy and objectives;  b) The aspects and impacts analysis of all operations.  - Major compliance -	The estates visited has conducted assessment on aspects and impacts analysis and established the environmental management plan base on significant aspect identified. The assessment was reviewed at minimum once a year.  FAS Ulu Belitong  Latest review on environmental aspect and impact analysis was conducted on 6/1/2020. All activity with significant impact were identified and documented in Significant Impact Register Form (Estate Operation), ref. no. FGV/FGVPM/F(IMS)/1.7 Pind 0. The estate has established environmental management plan base on assessment conducted.  FGVPM Bukit Tongkat B  Latest review on environmental aspect and impact analysis was conducted on 29/2/2020.	Complied	



Criterio	on / Indicator	Assessment Findings	Compliance
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.  - Major compliance -	<ol> <li>The estates visited has established Environmental Management plan base on Environmental Impact Aspect Assessment conducted. Sighted the implementation of the management plans follows:</li> <li>FAS Ulu Belitong</li> <li>The estate has established river buffer zone by demarcation of palm adjacent with river buffer zone with blue colour. Signboard on prohibition of chemical application has been erected at the buffer zone area as sighted in field "Peringkat 1' Block 10. Training on prohibition of chemical handling at buffer zone has been conducted on 14/4/2020</li> <li>Empty chemical container were triple rinsed and stored at designated store. The empty chemical container either be reuse for spraying or puncture and disposed appropriately through approved contractors.</li> <li>FGVPM Bukit Tongkat B</li> <li>Sighted the beneficial plant such as Cassia sp., Tunera sp., and Antigonan sp. were planted along the main road to PM 00N.</li> <li>All empty container were triple rinsed and reused for weeding activity or puncture and disposed through licensed DOE contractors. Sighted the latest disposal records as per invoice no. INV201456.</li> </ol>	Complied
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan.  - Minor compliance -	The program to promote activities with positive impacts was included in continual improvement plan. Among the plan established as follows:  1. Planting of beneficial plant 2. Appropriate management of empty chemical container	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
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.  - Major compliance -	<ol> <li>Effectiveness usage of paper</li> <li>Gotong Royong Perdana</li> <li>FGVPM Bukit Tongkat B</li> <li>Ensure prohibition of Zero Burning</li> <li>Reduction of pesticide usage</li> <li>The estates visited has established annual training program which covers the environmental awareness and compliance related trainings to the executives, staffs and workers. Sighted the training records as follows:</li> <li>Scheduled Waste management training dated 28/10/2020 and 23/10/2020</li> <li>Safety and health policy training dated 8/9/2020</li> <li>Group sustainability policy training dated 17 – 18/8/2020</li> <li>Environmental conservation, prohibition of open burning and buffer zone and HCV area training dated 14/4/2020</li> <li>Chemical premixing and triple rinsing training dated 3/2/2020</li> </ol>	Complied
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.  - Major compliance -	FAS Ulu Belitong The estate discussed their concern about environmental issue with the workers representative during Management Meeting. Sighted the minutes meeting dated 11/8/2020.	Complied
Criterio	n 4.5.2: Efficiency of energy use and use of renewable energy	ЭУ	
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends	The estate visited has established baseline for consumption of non-renewable energy monitored on monthly basis. Sighted the sampled	Complied

…making excellence a habit.<sup>™</sup>



Criterion / Indicator		Assessment Findings		
shall be observed within an appropriate timeframe. There	records of Dies	records of Diesel consumption per FFB produced FY 2020 as follows:		
should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the		FAS Ulu Belitong	FGVPM Bukit Tongkat B	
operations over the base period.	Baseline	1.0		
- Major compliance -	January	0.75	1.97	
	February	0.94	1.54	
	March	0.79	1.33	
	April	0.57	1.09	
	May	0.68	0.87	
	June	0.55	0.72	
	July	0.85	1.32	
	August	0.68	1.02	
	September	0.90	1.06	
	October	0.53	1.37	
	November	0.59	1.47	
		isited has established he plan established as	d Diesel consumption reduction follows:	on
		ecords and reduce and FFB transportation	diesel consumption in esta า	te
	2. Switch off evacuation		aiting for turn for in field F	-B



Criterion / Indicator		Assessment Findings	Compliance
4.5.2.2	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.  - Major compliance -	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets. Sighted the annual budget report for FY 2020.	Complied
4.5.2.3	The use of renewable energy should be applied where possible.  - Minor compliance -	No renewable energy used in the estate.	Complied
Criterio	n 4.5.3: Waste management and disposal		
4.5.3.1	All waste products and sources of pollution shall be identified and documented.  - Major compliance -	The estates visited has identified all waste products and source of pollutions and documented in Identification of Source and Type of Waste. The waste identified as follows:	Complied
		1. Scheduled Waste	
		<ul> <li>a. Estate Operation – Used PPE, Empty pesticides/chemical container, paint container, used lubricant, used hydraulic oil, oil filter</li> </ul>	
		b. Office and housing – Lamp, Electronic device	
		c. Vehicle and mill - battery	
		2. Non-schedule waste	
		a. Estate operation – used tyre, scrap iron, empty fertilizer bags	



Criterio	on / Indicator	Assessment Findings Compliance
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:	b. Office and housing – Paper, Plastic, domestic waste  3. Mill/Estate byproduct  a. Frond, chipped palm trunks(replanting), EFB, Shell and Fiber  The estate has established waste management plan base on the identification and source of pollutions and documented in Waste Management Plan. Sighted the implementation of the management
	<ul> <li>a) Identifying and monitoring sources of waste and pollution</li> <li>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</li> <li>- Major compliance -</li> </ul>	plan as follows:  FAS Ulu Belitong  1. The estate conducted domestic waste collection 2 times a week. Sighted the collection records FY 2020 in Domestic Waste Collection Schedule. The waste were disposed in designated landfill located at field Peringkat 1 blok 5. Sighted only domestic waste were disposed in the landfill.  2. The estate maintain the inventory of scheduled waste. Sighted the inventory records dated 23/7/2020 till 24/12/2020.  3. The estate conducted EFB application at the estate. Todate application records as at November 2020 at 337/16 tons.  FGVPM Bukit Tongkat B
		The estate conducted EFB application at the estate. Sighted the application records as follows:      FGVPM Bukit Tongkat B
		January 0.00
		February 0.00



Criterio	n / Indicator	As	sessment Findings		Compliance
		March	0.00		
		April	0.00		
		May	0.00		
		June	0.00		
		July	34.91		
		August	891.34		
		September	419.73		
		October	0.00		
		November	0.00		
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.  - Major compliance -	Waste Management. Re with the Environmental of FAS Ulu Belitong Scheduled waste gene servicing vehicle were of in Tun Razak Agriculture from FAS Belitong to P	duled wastes has been establed doc no. FGVPM/L3/PK-05 in comparison of the properties of the propertie	order to comply d Waste) 2005.  n except from G Headquarters be delivery note	Major Non- Conformity
		Aeroline Sdn. Bhd. to	ce, the estate has appointe conduct the services. The war collected and disposed by the	aste generated	



Criterio	on / Indicator	Assessment Findings	Compliance
		However, there is no evidences of the contractors appointed have an approval letter/permit from DOE to conduct off-site scheduled waste disposal.  FGVPM Bukit Tongkat B	
		The estate conducted repairs and service of all the vehicle and machineries by outside contractors. All waste generated was disposed by the appointed contractors. Refer letter approval by DOE no. AS (BB) 91/110/619/161 dated 6/9/2011.	
		For other Scheduled waste generated was disposed through DOE Licensed contractors. Sighted consignment note for latest disposal on 24/7/2020 as follows:	
		The estate conducted repairs and service of all the vehicle and machineries by outside contractors. All waste generated was disposed by the appointed contractors. Refer letter approval by DOE no. AS (BB) 91/110/619/161 dated 6/9/2011.	
		1. SW 410, consignment note no. 202007241232XTPG, 20200724123C6BWJ, 2020072412UFC6TA	
		2. SW 305, consignment note no. 20200724126CJHP5	
4.5.3.4	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.	FAS Ulu Belitong All empty container were send to central collection unit at PPTR as per approval letter by DOE dated 9/8/2016. Refer letter no. (BB) 91/110/619/161. Sighted the delivery note from FAS Belitong to PPTR dated 14/12/2020 and copy of 5 <sup>th</sup> schedule send to PPTR. FGVPM Bukit Tongkat B	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	All empty container were triple rinsed and reused for weeding activity or puncture and disposed through licensed DOE contractors. Sighted the latest disposal records as per invoice no. INV201456.	
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.  - Minor compliance -  FAS Ulu Belitong  Domestic waste were disposed in designated landfill located at field Peringkat 1 blok 5. Sighted only domestic waste were disposed in the landfill.  FGVPM Bukit Tongkat B  Domestic waste were disposed in designated landfill located at field PM 00G block 1. Sighted only domestic waste were disposed in the landfill.		Complied
Criterio	n 4.5.4: Reduction of pollution and emission		
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.  - Major compliance -	The estates visited has conducted assessment of all polluting activities and identified the significant aspects and impacts. Management plan has been established to reduce the pollution and emission.	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented.  - Major compliance -	Management plan has been established to reduce the pollution and emission. The management plan reviewed on annually basis. The management plan stated the activities, impacts, mitigation plan, person responsible and monitoring plan.	Complied
		Sighted the implementation of the plan as follows:  i. Both estate visited monitored the usage of diesel on monthly basis.  Sighted the diesel usage as follows:	



Criterion / Indicator		Assessment Findings			
		FAS Ulu Belitong	FGVPM Bukit Tongkat B		
	Baseline		1.0		
	January	0.75	1.97		
	February	0.94	1.54		
	March	0.79	1.33		
	April	0.57	1.09		
	May	0.68	0.87		
	June	0.55	0.72		
	July	0.85	1.32		
	August	0.68	1.02		
	September	0.90	1.06		
	October	0.53	1.37		
	November	0.59	1.47		
	demarcated w Sembrong (F Tongkat B). S	rith white and blue col AS Ulu Belitong) ar	for both estates visited were or at the palm as Sighted for Sg nd Sg. Penggeli (FGVPM Bukit on of chemical application were		



Criterion / Indicator			Assessment Findings			Compliance	
Criterio	Criterion 4.5.5: Natural water resources						
4.5.5.1	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:  a. Assessment of water usage and sources of supply.  b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.  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.).  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.  e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.  f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.  - Major compliance -	The on pla Sig 1.	annually basis. To the reduce wat white the implementation of the estate has palm adjacent whom prohibition of buffer zone are Training on prohibeen conducted. The estate mon recorded at 179 Latest river wate 8/9/2020. Analy Laboratory show NWQI Class IIC	the management of pollution and entation of the restablished river buffer of chemical appleta as sighted inhibition of chemical on 14/4/2020 at the rainfall of form on 14/4/2020 at the rainfall of sampling for the sampling for the rainfall of sampling for the rainfall of sampling for the sampling for the sampling for the the river as per test certificat Butter the water of the sampling for the	at plan was focus d water shortage management as er buffer zone be zone with blue of lication has beed in field "Pering nical handling an on monthly bas 19 rainy days. Sg. Sembrong v FGV Agri Ser er water quality ficate no. 255/2	y demarcation of colour. Signboard en erected at the kat 1' Block 10. It buffer zone has sis. todate rainfall was conducted on vices Sdn. Bhd. were conform to	Complied
	- мајот сопірпансе -		January	538	575		



Criterio	on / Indicator			Assessmen	t Findings		Compliance
			February	544	651		
			March	565	677		
			April	543	606		
			May	567	957		
			June	543	796		
			July	596	901		
			August	545	813		
			September	543	821		
			October	543	809		
			November	501	605		
		8/9 shc	/2020. Analysis	done by FGV A er water quality	gri Services Sdn were conform t	as conducted on Bhd. Laboratory NWQI Class IIC	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	and	Sighted during site visit, there was no construction of bunds, weirs and dams across Sg. Sembrong and Sg. Penggeli which flow through the estates visited.			Complied	
	- Minor compliance -						
4.5.5.3	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).	as hill	Estate visited has implemented water harvesting in the estate. Such as directing water from road side drain into the field. For planting at hilly area, the estate has constructed conservation terrace and plant cover crop to conserve water and prevent land erosion.				Complied



Criterion / Indicator		Assessment Findings	Compliance	
	- Minor compliance -			
Criterio	n 4.5.6: Status of rare, threatened, or endangered species ar	nd high biodiversity value		
4.5.6.1	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:  a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.  b) Conservation status (e.g. 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.  - Major compliance -	The estate has conducted Biodiversity assessment as per Biodiversity Report FASSB Ulu Belitong Estate dated 25/1/2020.  No HCV on biodiversity were identified in the estate area. As Sg. Sembrong were flowing through the estate, the report has identified the river buffer zone as hotspot area recommended the estate to conserve the area.  Biodiversity Management Plan FASSB Ulu Belitong (2018-2022) has been established.	Complied	
4.5.6.2	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:  a) Ensuring that any legal requirements relating to the protection of the species are met.  b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.  - Major compliance -	No HCV on biodiversity were identified in the estate. The estate have listed the all legal requirements relating to the protection of the species in the Legal Register.  Estate visited has conducted awareness training on prohibition of illegal hunting, fishing, handling and collecting activities of wildlife in the estate area. Signboard on prohibition of illegal hunting in the estates area has been erected at several strategic area such as estate entrance	Complied	



Criterio	on / Indicator	Assessment Findings	Compliance
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.  - Major compliance -	<ul> <li>Biodiversity Management Plan FASSB Ulu Belitong (2018-2022) has been established.</li> <li>Sighted the implementation of the management plan as follows:</li> <li>1. Latest river water sampling for Sg. Sembrong was conducted on 8/9/2020. Analysis done by FGV Agri Services Sdn. Bhd. Laboratory shows that the river water quality were conform with NWQI Class IIc as per test certificate no. 255/2020W.</li> <li>2. Estate visited has conducted awareness training on prohibition of illegal hunting, fishing, handling and collecting activities of wildlife in the estate area. Signboard on prohibition of illegal hunting in the estates area has been erected at several strategic area such as estate entrance. Latest training for Environmental conservation, prohibition of open burning and buffer zone and HCV area was conducted on 14/4/2020</li> </ul>	Complied
4.5.7.1	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.  - Major compliance -	FGVPM has established SOP for replanting as per 'Manual Ladang Sawit Lestari'. Ref doc. No MLSL (Ed.3) – Sec.2 (11.0) rev. 1/9/2017. In the SOP established stated the prohibition on used of fire during replanting operation.	Complied
4.5.7.2	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.  - Major compliance -	No open burning as per Group Sustainability Policy	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.5.7.3	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.	No open burning as per Group Sustainability Policy	Complied
	- Major compliance -		
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.	The previous crop were felled or mowed down, chipped and shredded and windrowed as per 'Manual Ladang Sawit Lestari'. Ref doc. No MLSL (Ed.3) – Sec.2 (6.0) dated 1/9/2017	Complied
	- Minor compliance -		
4.6 Prin	ciple 6: Best Practices		
Criterio	n 4.6.1: Site Management		
4.6.1.1	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 of the documentation identified as follows;	Complied
	rajor compilance	1. Manual Ladang Sawit LESTARI revision 3 dated 1/9/2017	
		2. Occupational Safety and Health Guideline dated 1/2/2020 and addition issue dated 12/6/2020	
4.6.1.2	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	FGV has established policy regarding oil palm grown within permitted levels on sloping land and documented Conservation of Sloping Land and river reserve Policy Signed by the CEO on 20/11/2017.  The estates construct terraces at slope area of more than 6 degrees.	Complied



Criterio	on / Indicator	Assessmen	t Findings	Compliance
	either soil, nutrients or chemicals.  - Major compliance -	Planting of cover crop are made conservation.	to retain the soil structure and	
		a) Road side pit are made to diversion and surface damage.	t water at slope areas to prevent	
		b) Terraces are constructed incline	d towards the terrace wall	
4.6.1.3	A visual identification or reference system shall be established for each field.  Field references were identified by year of planting. Sign erected and palms at the entrance of each field were the field identification.			Complied
	- Major compliance -			
Criterio	1 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.	The annual business plan is avail Procedure. & Guidelines. Both estormat i.e. in the form of annual	Complied	
	- Major compliance -	(Budget year, PY2, PY3, PY4, PY5) guidance for future planning. Th planting, age categories, and FFB		
		Component of operating expenditu		
		Maintenance and supervision	FFB Collection	
		- Weeding	- Labour	
		- Manuring	- Transportation/Evacuation	
		- Drain	- Supervision	



Criterio	Criterion / Indicator		Assessment Findings					Compliance
		- Pruning - Palm sai - boundar - Supply	nd soil cons		- Tools			
4.6.2.2	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.  - Major compliance -	performand FAS Ulu Be	ce field (yield litong ng program	d) and gand	oderma infe	ected palm.	2025	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.6.2.3	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  e) e) Financial indicators: cost benefit, discounted cash flow, return on investment  - Major compliance -	This requirement i.e. crop material, crop projection, yield, production cost is available. It is provided in the business management plan shown in item 4.6.2.1 above.  The estates had a format and guideline to calculate the returns on the field operations i.e. Income=sale of FFB (with award of CPO/CPK from the mill) less the expenditure (fixed and direct cost). This format is sighted.	Complied
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.  - Major compliance -	The estates performance is recorded in the monthly progress report.  a) Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein.  b) The management also provides variance report on the performance and reviewed on a monthly basis.  c) The supervisory personnel maintained a daily cost for the field operations.  d) The meeting involving the Managers sits monthly with the Regional PA and Head for the performance review.	Complied
Criterion	n 4.6.3: Transparent and fair price dealing		



Criterio	on / Indicator	Assessment Findings	Compliance
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented.  - Major compliance -	Sampled of the Surat Perintah Kerja of contractors as below: - SPK# 820105001 -19/820231503-12-184 which valid from 1/1/2020-31/12/2020 for transporting FFB from Ulu Belitong estate to mill.  Payments are processed and paid by the estates. Seen the payment	Complied
		vouchers (e.g. voucher #350203555) that have been made promptly.	
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.  - Major compliance -	The contracts agreements have the details about the pricing and terms & conditions. Payment was made promptly by verified the payment vouchers and interviewed with the contractors.	Complied
Criterio	n 4.6.4: Contractor		
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.	Clauses for the contractor to adhere the MSPO and legal requirements are spelled out in "Akuan Integriti Vendor & Pematuhan Pensijilan Kelestarian". E.g. seen SPK# 820105001 -19/820231503-12-184 which valid from 1/1/2020-31/12/2020	Complied
	- Major compliance -	12-10+ Which Valid Hoff 1/1/2020-51/12/2020	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor.  - Major compliance -	The contractors have signed on the <i>Surat Perintah Kerja</i> prior to provide services. At sampling estate, seen the SPK# 820105001 - 19/820231503-12-184 which valid from 1/1/2020-31/12/2020 for transporting FFB from estate to mill.	Complied
		FGV has agreed for BSI auditors to verify the assessment through a	
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.	physical inspection if required. This stated in the contract agreement between estate management and each contractor.	Complied
	- Minor compliance -		



Criterion / Indicator		Assessment Findings	Compliance
control points applicable	be responsible for the observance of the to the tasks performed by the contractor, g the assessment of the contractor for ontracted.	The estates will key in the Progress of Work done by the contractors into the system and Progress of Work Records will be generated. Work Completion certificate will be acknowledged by the Manager to accept the works done by contractor and payment will be made according to the certificate. Verified the contract payment slip for the payment of works done by contractor for November 2020.	Complied



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

Criterio	on / Indicator	Assessment Findings	Compliance				
4.1 Prin	4.1 Principle 1: Management commitment & responsibility						
Criterio	n 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy						
4.1.1.1	Policy for the implementation of MSPO shall be established.  - Major compliance -	FGV Holdings Berhad has established Group Sustainability Policy, approved by the Board of Directors dated 17/11/2020. Refer policy no. FGV/SED/POL/001, rev. 3.0.  The policy covers all sustainability aspects as stated under section 5. Policy as follows:  5. Promoting economic growth 5.1. Enhancing livelihood 5.2. Profitability and efficient use of resource 5.3. Obligation of value chain partners  6. Respecting human rights 6.1. Equality and non-discrimination 6.2. Upholding labour standard 6.3. Respecting rights of indigenous peoples and local communities 6.4. Health and safety 6.5. Preventing harassment and abuse  7. Protecting the environment 7.1. Efficient use of natural resource 7.2. Managing environmental impacts	Complied				



Criterio	n / Indicator	Assessment Findings	Compliance
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation.  - Major compliance -	<ul> <li>7.3. No deforestation and planting on peat</li> <li>7.4. Protect high biodiversity value (HBV) and High Conservation Value (HCV) areas</li> <li>7.5. Limitations on the use of hazardous chemicals and agrochemicals</li> <li>7.6. No open burning/use of fire</li> <li>7.7. Water management</li> <li>7.8. Waste management</li> <li>7.9. Addressing climate change</li> <li>8. Monitoring and implementation'</li> <li>8.1. Transparency and reporting</li> <li>8.2. Grievances management</li> <li>8.3. Traceability and supply chain</li> <li>Sighted under Group Sustainability Policy stated FGV Group is committed to continuously improve its products and services by adopting the best possible approaches to enhance productivity and profitability by optimising resources and operational efficiencies, while minimising negative impacts on people, social and environmental.</li> </ul>	Complied
Criterion	4.1.2 — Internal Audit		
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.	FGV Group has established SOP for Internal Audit and documented in Internal Audit Procedure, document no. FGV/ML-1A/L2-Pr11, issue 0, version 0 dated 1/6/2016.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	As stated in the SOP established, the internal audit were scheduled at minimum of once a year.  Latest internal audit was conducted on 16 – 17/10/2020 by 2 internal auditor from Sustainability Compliance and Certification Department.	
4.1.2.2	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.  - Major compliance -	Latest internal audit was conducted on 16 – 17/10/2020. 23 Non-conformity were issued during the internal audit.  Corrective action plan has been established was submitted and accepted to the Internal Auditor on 2/12/2020	Complied
4.1.2.3	Reports shall be made available to the management for their review.  - Major compliance -	The internal audit report was documented and made available for management review. As evidence, all findings from internal audit was responded by Mill Management within the timeframe stipulated in the Audit Procedure.	Complied
Criterio	n 4.1.3 – Management Review		
4.1.3.1	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.  - Major compliance -	Management review was conducted at minimum of once a year. Latest management review was conducted in 1/12/2020. Among the agenda discuss in the meeting as follows:  1. Audit result 2. Customer satisfaction 3. Production 4. Environmental 5. Social	Complied



Criterio	n / Indicator		Assessme	nt Findings	Compliance
		6.	Management Review		
		7.	Continuous Improvement Plan	n	
Criterior	<b>4.1.4</b> – Continual Improvement				
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.		ntinual improvement plan for the powing programme as follows:	he mill being strategized under the	Complied
	- Major compliance -		Programme	Deadline	
		1	Achieve OER ≥ 20.00%	December 2020	
		2	Achieve KER ≥ 5.50%	December 2020	
		3	Zero occupational accident	December 2020	
		4	Zero occupational accident involve fire in mill premise	December 2020	
		5	Achieve 100% compliance in DOE license and Pollution Control	December 2020	
		6	Achieve water consumption @ < 1.20 /ton FFB	December 2020	



Criterio	on / Indicator	Assessment Findings	Compliance
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.  - Major compliance -	Any new technology and/or innovation equipment is subject to approval by Headquarters.  Among the new technologies implanted in the mill was for Automation of steriliser control system to increase the efficiency for FFB sterilization using LSIS InfoU system.	Complied
4.2 Prin	ciple 2: Transparency		
Criterion	4.2.1 – Transparency of information and documents relevant to	MSPO requirements	
4.2.1.1	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.  - Major compliance -	Adequate information covering on environmental, social and legal issues which are relevant to stakeholders is shared for effective participation and decision making. Handbook of RSPO Certification for FELDA and FGV were distributed to all the stakeholders. Explanation of RSPO, MSPO, ISCC and all the policies were clearly stated in the handbook. Besides, process of complaints and grievances were included in the handbook. Sampling on communication between FGV and stakeholder regarding to availability of public document dated 5/12/2020. From the letter 13 Document was available for public. Sampling the records of inspections and visits by the authorities were maintained such as inspection of electricity by competent engineer, DOE visits and DOSH visits.	Complied
4.2.1.2	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.	Belitong POM holds copies of each of the management documents that are required to be publicly available referred letter 5/12/2020. Besides, all the information such as annual report, sustainability news and policies were found available in the company's website: www.fgvholdings.com	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -		
Criterio	n 4.2.2 - Transparent method of communication and consultation	on	
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders.  - Major compliance -	FGV has developed "Menangani Aduan dan Rungutan" procedure (Doc. No.FGV/ML-1A/L2-Pr13) issue no: 1 dated 1/6/2016) where the procedure has stated the information that provided to the stakeholders such as policies, social impact assessment and environment aspects. FGV has conducted a combined stakeholder meeting on 24/5/2018 for Belitong and Kahang complex. During the meeting, the management has explained the requirements of sustainable palm oil certification to all the stakeholders. Besides, briefing of policies and management procedures of sustainability was carried out during the meeting as well.  A supervisor in the mill has been appointed as management official	Complied
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> .  - Minor compliance -	to communicate any social matters in the mill reported by stakeholders. Appointment letter dated 1/2/2020 [ref.: (88)4056/BLT/830/1.Pt.2] was sighted.	Complied
4.2.2.3	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.  - Major compliance -	The stakeholder list was last updated on 2/1/2020 where internal and external stakeholders have been included in the list. Stakeholder meeting was last conducted on 24/5/2018 with the participation of internal and external stakeholders such as government authorities, NGOs, contractors and local communities. Requests or enquiries raised during the meeting was responded by the management and recorded in the minutes.  Apart from that, Housing Defect Report was also implemented to record any complaints reported by the workers.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
Criterio	n 4.2.3 – Traceability		
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.  - Major compliance -	FELDA Palm Industries Sdn Bhd has established Standard Operating Procedure: Manual Operasi, dated 23rd October 2017 and Prosedur, Sistem Pengurusan Kualiti, Keselamatan, Kesihatan Pekerjaan dan Alam Sekitar dated 8th June 2018. The mill is receiving FFBs from own estates and outsourcing suppliers. Addressed in FGVPISB's SOP Perkilangan untuk pematuhan Sistem Pensijilan MSPO SCCS [Doc. No.: MSPO SCCS, Issue 1, rev. 3, dated 1/9/2019]. The procedure has clearly explained to ensure the handling of incoming FFB and outgoing CPO/PK are carried out in proper manner.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system.  - Major compliance -	Regular inspections on compliance with the established traceability system were conducted through periodical internal audit. Furthermore, MPR system to ensure the traceability by monitoring on daily basis by Assistant Manager.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system.  - Minor compliance -	Manager of the Mill was the responsible person to implement MSPO SCCS in the mill. The management functions and job descriptions of the Manager have been clearly outlined in the SOP above. Assistant Manager of the Mill will assist the Manager to ensure the implementation of MSPO SCCS effectively.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.  - Major compliance -	Records of CPO & PK sales & delivery including Weighbridge Tickets together with sales Delivery Order Chit and Daily Despatch (CPO/PK) Record were maintained based on the established SOP. As at to-date, there has been no CPO or PK sold as MSPO certified.	Complied
4.3 Prin	ciple 3: Compliance to legal requirements		



Criterio	on / Indicator	Assessment Findings	Compliance
Criterio	<b>1 4.3.1 –</b> Regulatory requirements		
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.  - Major compliance -	<ol> <li>Compliance to each applicable law and regulation is monitored by the operating units. Sighted the sampled evidence of compliancy to the regulation as follows:         <ol> <li>MPOB License no. 500170904000. For sell and move, store and processing 288000 ton FFB. Validity period from 1/4/2020 -1 31/3/2021</li> <li>MPOB License no. 6188385003000 and 618297015000. For sell and move, purchase and move of FFB. Validity period from 1/7/2020 -30/6/2021 and 1/6/2020 and 31/5/2021.</li> <li>DOE's Compliance Schedule no. AS(B)J 31/152/000/033Jld.6(22)(PINDAAN) for license no. 00898. Validity period from 1/7/2020 – 30/6/2021</li> <li>DOE's Compliance Schedule no. JPLP/PUB/19/005359 Kilang Sawit Belitong for contradiction License no. 005359. Validity period from 6/6/2020 – 5/6/2021</li> <li>River Water Detour and Abstraction license no. 08/A/Klg/016. Valid till 31/12/2020</li> <li>Permit for Schedule Control Goods (Diesel and Petrol), permit no. BPGK JH (KLU) 1193 SK (BLESS ref. no. BL2202009829). Validity period from 29/7/2020 -1 28/7/2021</li> <li>Private Installation License no. 2020/02951. Validity period from 29/11/2020 - 28/8/2021</li> <li>Competence person license</li> </ol> </li> </ol>	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register.  - Major compliance -	<ul> <li>a. Authorized Gas Tester and Authorised Entrant and Standby Person for Confined Space no. HQ/18/AGTES/01/02999. Validity period from 13/10/2019 – 12/10/2022</li> <li>b. CePSWaM Cert no. CePSWaM/2012352. Validity period from 30/10/2020 – 30/10/2021</li> <li>c. CePPOME Cert. no. CePPOME/201042. Validity period from 16/3/2020 – 16/3/2021</li> <li>d. Steam Engineer- 1st Grade steam engineer, certificate no. 099/2011 2nd Grade steam engineer, certificate no. 173/2013</li> <li>e. 0175476350</li> <li>The applicable laws identified were listed in Register of Legal and Other Requirements (Daftar Perundangan dan Lain-lain Keperluan), document no. FGV/FGVPM/IV/IMS/15/2.1.</li> <li>Latest review was conducted on 5/12/2020. The sample of Act and Legal as listed as follows:</li> <li>1. Infectious Disease Prevention and Control Act 1988</li> <li>2. Occupational Safety and Health 1994, Noise Regulation 2019</li> <li>3. National Salary Consultative Council Act 2011, Act 732, (Minimum Wage Order 2020)</li> <li>4. Labour Act 1955</li> <li>5. Minimum housing standard and amenities (amendment) 2019, Act 446</li> </ul>	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.	The mechanism of tracking changes and update are guided by procedure on Legal and Other Requirements (Pematuhan Undang	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	- Undang dan Keperluan Lain), document no. FGV/ML-1A/L2-Pr6, issue 1, ver. 0 dated 1/6/2016.	
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.	The mill has appointed Asst. Mill Manager as person responsible to monitor compliance and to track update the changes in regulatory requirements as per appointment letter no. (29)4056/BLT/830/1pt.2 dated 5/6/2020 signed by the Mill	Complied
	- Minor compliance -	Manager.	
Criterio	n 4.3.2 – Lands use rights		
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.  - Major compliance -	The mill land is legally owned by Felda Palm Industries Sdn Bhd as verified the land title No. PTD 8774. There was no land dispute in the Belitong POM by verified through interviewed with the local communities.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.  - Major compliance -	Bukit Tongkat B Estate holds total 12 land titles (under FELDA) which they leased from FELDA for approximately 848.88 Ha for 99 years. For Ulu Belitong estate, the total hectarage is 138.49 ha. The rental agreement was signed between Federal Land Development Authority and Felda Agricultural Services Sdn Bhd dated 7 Feb 2017 which expired on 31/12/2017. As per letter (18)820101013/khidmat korporat/External dated 14/6/2019, new rental agreement has been established for Ulu Belitong estate with new total hectarage 157.12 Ha.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.  - Major compliance -	FGVPISB leased the land from FELDA and FELDA leased all the land directly from the government. There were no issues of land disputes recorded. All documentation regarding the lease were kept	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		in the office and available for review. Legal boundary along the mill were clearly demarcated with fences.	
4.3.2.4	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 and that these should have been accepted with free prior informed consent (FPIC).	There is no land dispute in the Belitong POM at the time of audit. The lands are belonging to FELDA – Ulu Belitong Scheme by verified through the agreement. The surrounding is owned by settlers. There was no encroachment of land by the Belitong POM.	Complied
	- Minor compliance -		
Criterio	n 4.3.3 – Customary rights		
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.	The mill land is legally owned by Felda Palm Industries Sdn Bhd as verified the land title record. The existing land is not encumbered by any customary land rights.	Complied
	- Major compliance -		
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available.  - Minor compliance -	The mill land is legally owned by Felda Palm Industries Sdn Bhd. The lands are legally leased by state government and leased by FELDA to FGVPM and Felda Agricultural Services Sdn Bhd. The existing land is not encumbered by any customary land rights.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available.  - Major compliance -	The mill land is legally owned by Felda Palm Industries Sdn Bhd. The existing land is not encumbered by any customary land rights.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
Criterio	n 4.4.1: Social Impact Assessment (SIA)		
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.  - Minor compliance -	SIA was conducted on 23/1/2018 and 24/1/2018 for the Mill and Bkt Tongkat B Estate and Ulu Belitong Estate. Stakeholders such as workers, contractor, drivers, suppliers and external stakeholders were participated in the assessment. Positive and negative impacts have been recorded in the SIA Management Plan.	Complied
Criterio	n 4.4.2: Complaints and grievances		
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented.  - Major compliance -	FGV has developed procedure of "Menangani Aduan dan Rungutan" (Doc. No.: ML-1A/L2-Pr13(0), Version 0 dated 1/6/2016). The objectives of the procedure are to provide a channel for the internal stakeholders and external stakeholders to lodge any complains to the management. Mechanism to handle complaints was clearly described in the procedure. There are 5 stages of process for internal complaint. The time frame for investigation of the issue should be done within 14 working days.	Complied
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.  - Major compliance -	Belitong POM has implemented Complaint and Response Form/ Book to record complaints or requests from the stakeholders. Most of the complaints were about defects of housing facilities.  Since the last assessment, there were 5 complaints from FELDA settlers with regards to FFB not process or late process. Based on the action recorded, all of the complaints have been resolved dated 25/5/2020.  Based on the records of complaints lodged, the actions taken by the management were appropriate and timely manner.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.	The complaint record book was available in the office area where the stakeholders can easily access to lodge their complaint.	Complied
	- Minor compliance -		
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.	From the interview with internal and external stakeholder during stakeholder consultation found that they were aware of the complaint procedure and were briefed by the management during stakeholder meeting. The record of complaint record was as	Complied
	- Minor compliance -	available in Mill record.	
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.	The records of complaint for the past 24 months (since Jan 2018) were available in the complaints records book.	Complied
	- Major compliance -		
Criterio	1 4.4.3: Commitment to contribute to local sustainable developr	nent	
4.4.3.1	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.	Since the last assessment, contribution from the mill were of in monetary form to a school and a local society. Seen the request letters [ref.:SKB/JBA2041 100/19/4/3] dated 9/2/2020 and acknowledgement by the stakeholders upon receipt of the contribution. Record requested been approved referred FAS-	Complied
	- Minor compliance -	RSPOL4/K1.1/1.1.1 & 1.1.2.	
Criterion	1 4.4.4: Employees safety and health		
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and	FGV Holding Berhad has documented safety and health policy in the Group Sustainability Policy, approved by the Board of Directors	Major Non- Conformity



Criterion / Indicator	Assessment Findings	Compliance
Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.	dated 17/11/2020. Refer policy no. FGV/SED/POL/001, rev. 3.0. under section 5.2.4: Health and Safety.	
- Major compliance -	In the policy stated the commitment:	
	4. Providing a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of FGV facilities. This commitment also applies in situations where any public health concern arises in FGV facilities	
	5. FGV group shall ensure that all health and safety plan is documented, communicated and implemented	
	6. FGV group shall allocate appropriate resources in order to minimize and eliminate health and safety risk	
	The mill has established the Safety and health Plan FY 2020. The plan was reviewed on annually basis. Sighted the sampled implementation of the management plan as follows:	
	1. Baseline Noise risk assessment was conducted on 5/2/2020. Refer report no. HQ/LPROYKPEB/20/00106. The assessment conducted by registered assessor with reg. no. HQ/16/PEB/00/158.	
	2. Audiometric test was conducted from 26/9/2020. 72 workers were send for the test. 1 workers were found with temporary with STS and required to attend retest and will be send on 21/12/2020.	
	3. Latest annual examination and testing of local exhaust ventilation system was conducted on 13/11/2020. Refer report no. MZ/KSB/LEV/1120. The test was conducted by registered Hygiene Tech II with reg. no. HQ/16/JHII/00/112.	



Criterio	n / Indicator	Assessment Findings	Compliance
		Based on the Medical Surveillance report dated January 2020, 1 workers were found to have anemia and declared temporary unfit to work at his current station, workshop till further investigation conducted. However, no investigation has been conducted and the workers were currently continued working in the workshop Thus Major Finding been raised during this audit.	
4.4.4.2	<ul> <li>The occupational safety and health plan should cover the following:</li> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risk of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ol> <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> <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</li> </ol> </li></ul>	FGV Holding Berhad has documented safety and health policy in the Group Sustainability Policy, approved by the Board of Directors dated 17/11/2020. Refer policy no. FGV/SED/POL/001, rev. 3.0. under section 5.2.4: Health and Safety.  The policy was communicated through training, briefing and displayed on notice board at several placed in the mill.  The mill health and safety issue assessment has been documented in hazard identification, risk assessment and risk control HIRARC. The assessment include all processing activities and support activities base on workstation. All activities with significant risk has been listed and mitigation plan to improve the condition has been established and documented. The document was reviewed at minimum of annually or during accident occur.  Latest HIRARC review was conducted on 23/11/2020 for COVID 19 and 1/11/2020 due to accident occur at water treatment plan and boiler station.  The chemicals handlers have been given appropriate training including lab operators and chemical store keeper. Sighted the training records for chemicals handlers:	Minor Non- Conformity



Criterion / Indicator		Assessment Findings	Compliance
f) The manage workers' safe shall have known and collective g) The manager with their emsuch as those are discussed ant the conceshall be record h) Accident and shall be clearliing Employees troperations. Feworksite. j) Records shall	nent shall conduct regular two-way communication in ployees where issues that affect their business is related to employees' safety, health and welfare openly. Records from such meeting shall be kept erns of employees and any remedial actions taken ded.  emergency procedures shall exist and instructions y understood by all employees.  Tained in First Aid shall be present at all mill irst Aid equipment should be available at each.  I be kept of all accidents and be reviewed a quarterly intervals.	1. Chemical handling and scheduled waste handling training dated 1/12/2020  The mill management has provided all the workers with appropriate PPE as per HIRARC conducted and Safety Working Procedure established. 2 pair of shoes and 2 units of earplug was provided to all workers annually. Other PPE was provided if necessary according to job. Records of PPE issuance recorded by individual employee and documented in 'Pengambilan Alatan Keselamatan' form. Sighted the sampled PPE issue for workers at water treatment plant and boiler station with employee no. as follows: 12011xx 12093xx 12013xx 12048xx  Noted during interview with contractor workers (Hamid Engineering & Enterprise) who work as sorter at loading ramp, they were not provided with safety shoes which they have to purchase by themselves. This was against their employment contract under section i) i. PPE will be provided by the employer appropriate to the job.  FGVPISB has established SOP for Chemical Handling and documented in the Safety Operating Procedure, Chemical Handling. Refer doc no. FPI-PK-036, issue no. 3 dated 14/7/2018.	



Criterion / Indicator	,	Assessment Find	dings	Compliance
	chairman for safety Procedure FPI/L2/QC OSH Committee ch 1/1/2020 by the Gr appointed several star All safety, health ar committee meeting s	and health committed of the committed of	as responsible person and tee as per QOHSE Manual Manager has appointed as appointment letter dated the mill management has DSH Committee.  The discussed during OSH port from other group mill. In the discussed the minutes meeting	
	Meeting	Date		
	1 <sup>st</sup> quarter 2020	12/2/2020		
	2 <sup>nd</sup> quarter 2020	19/5/2020		
	3 <sup>rd</sup> quarter 2020	13/8/2020		
	4 <sup>th</sup> quarter 2020	1/12/2020		
	performance, work stakeholder request, OSH training and pro FGVPISBPISB has documented in Emer	splace inspection feomplaint, laws an ogram and any othe established eme gency Preparednes	rding safety and health reports, audit report, d regulations compliancy, r matters.  rgency procedures and s and Response in QOSHE 1/L2/QOSHE-14.0. In the	



Criterio	on / Indicator	Assessment Findings	Compliance
		procedure stated emergency procedure on fire, minor and major accident and chemical spillage. The procedure is written in Bahasa Malaysia an available at the office for review. Latest fire drill training and firefighting training dated 2/9/2020 and 4/12/2020.	
		The mill have competent First Aider. Sighted during site visit first aid was available in the supervisor room with item as per requirement. The person in charge and first aider information displayed on the first aid kit.	
		Training for first aider was conducted on 25/2/2020. First aid monitoring was conducted on quarterly basis. Sighted the monitoring records dated 15/12/2020, 9/9/2020 and 6/5/2020.	
		The mill monthly accident report was send to the region SHE Department for compilation.	
		Accident report were reviewed at minimum of quarterly basis during Safety and Health committee meeting.	
Criterio	n 4.4.5: Employment conditions		
4.4.5.1	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.  - Major compliance -	Felda Global Ventures has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. FGV is committed and support human rights. Communication to the employees was done in various methods such as briefing during morning muster, display on notice boards at workers' hostel and training. Interview with	Complied
		workers showed that they have a good understanding on human rights.	



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.5.2	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.  - Major compliance -	Felda Global Ventures has established Equal Opportunity Policy Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. The company is committed to ensure all the employees are treated equally regardless of race, nationality religion, gender, age and other political opinions. Interview with the workers showed that no discrimination is being practiced.	Complied
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.  - Major compliance -	FGV Plantations (M) Sdn Bhd has established an employment contract for its foreign workers. Pay and conditions are documented and are above the Minimum Wage Order 2020. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Sampled of the pay slips for the months of Jan, March, June, Oct and Nov confirmed that the workers were paid in accordance with Minimum Wage Order 2020. The sampled employees were Emp. No.: 1201430,1210838,1204795,1210564,1209389,1201376,1211973, 1211871,1201696,1201430,1201376,1204795,1211630	Complied
4.4.5.4	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.  - Minor compliance -	There was 1 permanent engaged by the mill. Most of the maintenance and repair works are carried out by their own technicians or short term contractor. Therefore, there was no issue on the wages of employees of contractors.  Sample on contractor workers record as per below:-	Minor Non- Conformity
		Hamid Engineering & Enterprise on sorting FFB:- The sample workers were :-	



Criterio	n / Indicator	Assessment Findings	Compliance
		820128-01-6233	
		800129-01-5971	
		660124-01-6107	
		660125-01-5737	
		800921-01-6417	
		However found under June 2020 payslip for 800921-01-6417 (Ithinan) no payment for rest day on 8 June 2020 (Agong Birthday) as per June Payslip and Punch card verification and 23 March 2020 (Hari Keputeraan Rasmi DYMM Sultan Johor), Thus Minor finding been raised during this audit.	
		Offer letters were issued and acceptance of offer were acknowledged, and copies were kept by the workers. This has been verified through interview with workers. The terms and conditions such as salary, termination of employment, annual leave entitlement and probation period were clearly stated in the Contract Agreement dated 20/9/2020 (04)4056/BLT/840/Pencungkil BTS	
4.4.5.5	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.	All the recruited workers will be registered in the Human Resource Management System (HRMS) where personal details such as name, nationality, date of employed, job description, wage rate, date of birth, gender and entitlement of public holiday was stated in the biodata form.	Complied
	- Major compliance -		



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.5.6	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.  - Major compliance -	The record Offer letters were issued and acceptance of offer were acknowledged and copies were kept by the workers. This has been verified through interview with workers. The terms and conditions such as salary, termination of employment, annual leave entitlement and probation period were clearly stated in the Contract Agreement between FGV Palm Industries Sdn Bhd and Kesatuan Pekerja-pekerja FGV Palm Industries Sdn Bhd Semenanjung. The agreement validity period is from 1/1/2019 to 31/12/2021.  Sampled of offer letters were Emp. No.: 1201430,1210838,1204795,1210564,1209389,1201376,1211973, 1211871,1201696,1201430,1201376,1204795,1211630	Complied
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.  - Major compliance -	The working hours are recorded using punch card system where the attendance can be verified through the punch card of individual workers. The time enter, break time and exit of work were also clearly stated in the punch card. Sampled of time card as follows: Emp. No.:  1201430,1210838,1204795,1210564,1209389,1201376,1211973, 1211871,1201696,1201430,1201376,1204795,1211630	Complied
4.4.5.8	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.  - Major compliance -	Based on the records review of the Punch card of sampled workers it was found that the entry time and exit time which were clearly stated in the punch card, conformed to the terms and conditions stipulated in the collective agreement [ref.: Perjanjian Bersama antara FGV Palm Industries Sdn Bhd dengan Kesatuan Pekerjapekerja FGV Palm Industries Sdn Bhd Semenanjung, validity 1/1/2019 to 31/12/2021.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.  - Major compliance -	Documented payslip was distributed to individual workers on the day of payment. Wages and overtime were paid according to the "Punch Card". Total hours of overtime and daily attendance has recorded in the time card. The following payslip were sampled for Jan 2020, Jun 2020 and Oct 2020 as below:  Emp.  No.: 1201430,1210838,1204795,1210564,1209389,1201376,1211973, 1211871,1201696,1201430,1201376,1204795,1211630  All of their pay complied with the Minimum Wage Order 2020. Hours of overtime were recorded in the overtime form.	Complied
4.4.5.10	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.  - Minor compliance -	The management has provided facilities such as mosque, recreational facilities such as futsal field, badminton court and volleyball court to the workers and dependents. Government clinic was available in the complex. The workers will be granted bonus once a year based on performance of the workers. Incentive and allowance was given to the workers as well.	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.  - Major compliance -	The mill workers housing is provided with basic facilities such as government clinic, football field, mosque, sundry shops and other amenities such as electricity and water supply from government. Line site inspection was carried out in Belitong Mill workers housing on weekly basis and inspection records were available for verification.  Inspection frequency still not meeting the weekly requirement i.e. Last: 17/11/2020, 26/11/2020, 2/12/2020 and 9/12/2020	Complied
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.	The company established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 17/11/2020. The company is committed to protect the rights of women on the reproductive and	Complied



ndicator	Assessment Findings	Compliance
management shall respect the right of all employees to form join trade union and allow workers' own representative(s) to litate collective bargain in accordance with applicable laws and ulations. Employees shall be given freedom to join trade unions vant to the industry or organize themselves for collective gaining. Employees shall have the right to organize and otiate their work conditions. Employees exercising this right uld not be discriminated against or suffer repercussions.	family planning. Discrimination is not allowed in the company. Besides, procedure "Menangani Aduan Melalui Jawatankuasa Wanita" (Doc. No.: FGV/ML-1A/L2-Pr14, Version 0 dated 1/6/2016) was developed to provide a system to channel the complaint regarding sexual harassment and violence. Gender committee and KKD committee was established in the mill to monitor and handle sexual harassment and violence case in the mill. The last meeting was conducted on 24/1/2020 which combined with the estates committee. There was no issue regarding sexual harassment and violence reported.  The company established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 17/11/2020. The company allows the employees to join any legal association and get approval from the management. Workers' Committee was established to discuss issues among the workers. Meeting minutes dated 28/6/2019 was sighted. No issue was raised.	Complied
dren and young persons shall not be employed or exploited. The	The company established Group Sustainability Policy with Policy	Complied
imum age shall comply with local, state and national legislation.  ajor compliance -	not recruit any individual who less than 18 years old to work in plantations. Document reviewed on the list of workers confirmed that all the employees were above 18 years old.	·
liungou	management shall respect the right of all employees to form join trade union and allow workers' own representative(s) to itate collective bargain in accordance with applicable laws and lations. Employees shall be given freedom to join trade unions vant to the industry or organize themselves for collective jaining. Employees shall have the right to organize and obtate their work conditions. Employees exercising this right all not be discriminated against or suffer repercussions.  Injor compliance -  dren and young persons shall not be employed or exploited. The mum age shall comply with local, state and national legislation.	family planning. Discrimination is not allowed in the company. Besides, procedure "Menangani Aduan Melalui Jawatankuasa Wanita" (Doc. No.: FGV/ML-1A/L2-Pr14, Version 0 dated 1/6/2016) was developed to provide a system to channel the complaint regarding sexual harassment and violence. Gender committee and KKD committee was established in the mill to monitor and handle sexual harassment and violence case in the mill. The last meeting was conducted on 24/1/2020 which combined with the estates committee. There was no issue regarding sexual harassment and violence reported.  The company established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 17/11/2020. The company allows the employees shall be given freedom to join trade unions and lations. Employees shall have the right to organize and obtate their work conditions. Employees exercising this right all not be discriminated against or suffer repercussions.  Injor compliance -  The company established Group Sustainability Policy with Policy was sighted. No issue was raised.  The company established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 17/11/2020 where the company will not recruit any individual who less than 18 years old to work in plantations. Document reviewed on the list of workers confirmed



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.  - Major compliance -	<ol> <li>First aid training dated 25/2/2020</li> <li>Fire prevention system training dated 12/3/2020</li> <li>Bobcat and shovel hand ling training dated 7/8/2020</li> <li>Supply chain training dated 10/9/2020</li> <li>FFB grading training dated 27/9/2020 and 2/10/2020</li> <li>Chemical handling and scheduled waste handling training dated 1/12/2020</li> <li>Fire drill and firefighting training dated 1/9/2020 and 4/12/2020</li> </ol>	Complied
4.4.6.2	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.  - Major compliance -	The mill has established training program based on annual training need analysis conducted and documented in 'Training Need Analysis 2020' and document were available for review. The analysis was based on issue of concern, job designation and type of training needs and number of attendance for each training required.	Complied
4.4.6.3	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.	The mill has training program which updated annually based on training need analysis. The training identified were programmed throughout the year.	
4.5 Prin	- Minor compliance -  ciple 5: Environment, natural resources, biodiversity and	l ecosystem services	
	n 4.5.1: Environmental Management Plan	<b>,</b>	
4.5.1.1	An environmental policy and management plan shall be in line with	FGV Holding Berhad has documented environmental policy in the Group Sustainability Policy, approved by the Board of Directors	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	the relevant country and state environmental laws shall be established, effectively communicated and implemented.	dated 17/11/2020. Refer policy no. FGV/SED/POL/001, rev. 3.0. under section 5.3 Protecting the Environment.	
	- Major compliance -	The policy was communicated through training, briefing and displayed on notice board at several placed in the mill.	
4.5.1.2	The environmental management plan shall cover the following: <ul> <li>a) An environmental policy and objectives;</li> <li>b) The aspects and impacts analysis of all operations</li> </ul> - Major compliance -	The mill has conducted assessment on aspects and impacts analysis and established the environmental management plan base on significant aspect identified. The assessment was reviewed at minimum once a year. Latest review was conducted on 6/4/2020.	Complied
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.	The mill has established environmental management plan and documented in Pollution Reduction Plan FY 2020. Sighted the implementation of the management plan as follows:	Complied
	- Major compliance -	1. The mill monitor the diesel consumption for vehicle and machineries used on monthly basis. Sighted the diesel consumption records as todate November 2020.	
		2. The mill records the inventory for schedule waste and reported to DOE through ESWISS. Sighted the records in the system for the month of May to November 2020.	
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan.  - Minor compliance -	The program to promote positive impact are included in the Environmental Management Plan. Sighted the implementation of the plan as follows:	Complied
	- Pinioi Compilance -	i. Usage of shell and fiber as fuel for boiler to reduce the usage of diesel.	
4.5.1.5	An awareness and training programme shall be established and	The mill has established training program for all the employee and documented in Training Schedule for Employee/Contractors. The	Complied



Criterio	on / Indicator		Assessment	Findings	Compliance
	implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives.		n covers, Environme al control procedure ar	ental Aspects and Impacts, and etc.	
	- Major compliance -				
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.	Committee of employee.	consist of representa	ment Performance Monitoring tive from the employer and	Complied
	- Major compliance -	Sighted the la	atest EPMC minutes m	eeting dated 1/12/2020.	
Criterio	<b>4.5.2:</b> Efficiency of energy use and use of renewable energy				
4.5.2.1	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,	energy at 1.	18 L/MT FFB processe records of Diesel cons	consumption of non-renewable d monitored on monthly basis. umption per FFB processed FY	Complied
	electricity in the operations over the base period  - Major compliance -			agement Plan FY 2020. Sighted nsumption/ton FFB as follows:	
		Month	Consumption L/FFB		
		January	0.97		
		February	0.70		
		March	0.50		
		April	0.71		
		May	0.69		



Criterio	on / Indicator		Assessment	Findings	Compliance
		June	0.52		
		July	0.85		
		August	0.67		
		September	0.54		
		October	1.87		
		November	1.29		
4.5.2.2	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.  - Major compliance -	Diesel estima		non-renewable energy for 2020. 0 with a total diesel versus FFB FFB.	Complied
4.5.2.3	The use of renewable energy should be applied where possible.  - Minor compliance -			boiler to reduce the usage of at ratio of 80% fiber and 20%	Complied
Criterion	<b>4.5.3:</b> Waste management and disposal				
4.5.3.1	All waste products and sources of pollution shall be identified and documented.  - Major compliance -	evaluation of Indicator 3.4 Domestik da	environmental aspec 2. Thereafter, docume <i>n Bahan Buangan</i> " (M	erally identified through the t and impact as mentioned in ented in "Pelan Pengurusan Sisa lanagement Plan for Domestic The form has the information	Complied



Criterio	n / Indicator			Assessment Finding	s	Compliance
		Apa Do. 1, Sai rev Bas the	used PPE, HD fibre, used oil Method of dis art from that, th mestik" (Domes rev. 0, 1/6/20 mpah" (Guidelin c. 0, 1/6/2016) sed on site visit	es — e.g. fertilizer bags, plass PE containers, organic was I, used oil filter sposal — generally to reduce there is also a procedure entitic Wastes Disposal) [FGV/016] and "Garis Panduame for Landfill Preparation used as guidance to avoic at the landfill at the estates are located far from residents.	tes, POME, EFB, shell, e, reuse and recycle titled " <i>Pelupusan Sisa</i> ML-1A/L2-Pr23, issue <i>Pembinaan Lubang</i> " (ML-1A/L3-GP2(0), I or reduce pollution. , it was observed that	
4.5.3.2	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:  a) Identifying and monitoring sources of waste and pollution.  b) Improving the efficiency and recycling potential of mill byproducts by converting them into value-added products.  - Major compliance -	ide Ma pla 1.	ntification and nagement Plan. n as follows: The mill maint records and re ESWISS invent October and No EFB were dispo	osed at the sister estate as Reviewed the disposal reco FGVPM Bukit Tongkat B 0.00	ocumented in Waste n of the management uled waste inventory SWISS. Reviewed the f August, September, parts of nutrient	Complied
			February	0.00		



Criterio	on / Indicator			Assessment Finding	s	Compliance
		March		0.00		
	April		0.00			
		May		0.00		
	June		0.00			
	July		34.91			
	August		891.34			
	Septem	ber	419.73			
	Octobe	•	0.00			
		Noveml	oer	0.00		
4.5.3.3	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		ageme the 5.	scheduled wastes has beent. Ref doc no. FGVPM/LEnvironmental Quality Rest disposal records as follow	3/PK-05 in order to gulations (Scheduled	Complied
	as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005	1. 1/9/2020 SW 409, C/N no. 0149499				
	- Major compliance -	1		410, C/N no. 0149286		
				305, C/N no. 0149500 110, C/N no. 0149285		
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.	Domestic was sister estate		ere disposed at designated	l landfill managed by	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	- Minor compliance -		
Criterio	n 4.5.4: Reduction of pollution and emission		
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.	The mill visited has conducted assessment of all polluting activities and identified the significant aspects and impacts. Management plan has been established to reduce the pollution and emission.	Complied
	- Major compliance -		
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented.  - Major compliance -	Management plan has been established to reduce the pollution and emission. The management plan reviewed on annually basis. The management plan stated the activities, impacts, mitigation plan, person responsible and monitoring plan.	Complied
		Sighted the implementation of the plan as follows:	
		1. The diesel consumption for the mill for Jan-Dec 2020, were available. The figures were recorded at 0.73 lt/mt FFB	
		2. The mill maintain and monitor the scheduled waste inventory records and reported to DOE through ESWISS. Reviewed the ESWISS inventory reports for the month of August, September, October and November 2020.	
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.	The mill applies the biological system with anaerobic lagoon and equipped with bio-polishing plant for its treatment of effluent. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Based on quarterly report to the DOE, generally the mill has complied with	Complied



Criterio	n / Indicator		Assessment	Findings	Compliance
	- Major compliance -			past 12 months results, the hile the lowest was 7 ppm.	
Criterion	4.5.5: Natural water resources				
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:  a) Assessment of water usage and sources.  b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.  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.).  - Major compliance -	management  1. Mill Opera a. Pump r hours/d b. Records c. Clean/tr 2. Workers I a. Resolve b. Drain m The mill has m3/FFB proc	plan as follows: ation: iver water into water ay water consumption reated water usage by nousing water supply complair aintenance established baseline f		Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.5.5.2	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 applies the biological system with anaerobic lagoon and equipped with bio-polishing plant for its treatment of effluent. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Based on quarterly report to the DOE, generally the mill has complied with the regulated limit. Based on the past 12 months results, the highest BOD reading was 21 ppm while the lowest was 7 ppm.	Complied
4.6 Prin	ciple 6: Best Practices		
Criterio	n 4.6.1: Mill Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  - Major compliance -	Mill holds three SOP and documentation available at the mill for review. Noted the Sustainable Palm Oil Manual Procedure, Safety working procedure and Quality, Occupational Health, Safety and Environmental Procedure.  Sighted the latest review in Sustainability Palm Oil Manual on	Complied
		procedure for competency, awareness and training dated 1/6/2016. FGVPISB has established mechanism to monitor the implementation of their procedure by Mill/Plantation Advisor Visit, Agronomist Visit, Mill Quality Control Unit and Audit on compliance to SOP (P&D). The visit conducted on annually basis.	
		The mill processing system is documented in the following documents;	
		a) Manual Operasi Kilang Sawit first introduced on 2/1/2001 &	
		revised dated 23/10/17	



Criterio	on / Indicator	Assessment Findings	Compliance
		b) Prosedur Kerja Selamat c) Manual Alam Sekitar EMS These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from the reception, sterilization, threshing, pressing, clarification, depericarping (nut polishing) station, effluent, laboratory, workshop, dispatches etc. In addition, there are also	
4.6.1.2	All palm oil mills shall implement best practices.  - Major compliance -	manuals available within the industry and MPOB that are used as guidelines.  FGVPISB has established mechanism to monitor the implementation of their procedure by Mill Advisor Visit. The visit conducted on annually basis. The report covers on Product quality, Process and Maintenance cost, mill throughput, compliances to law and regulation, OSH and cleanliness.	Complied
		Records and monitoring has been established in Belitong POM and the document are available for review.  The monitoring of the mill process is made through the shift supervision headed by an Assistant Engineer and the Mill Assistant. All process parameters are documented and summarized in a daily report. The external monitoring is made through visits by the General Manager and also technical personnel from the Head Office. DOSH performed the annual UPV machinery inspection. This is to ensure compliance to Policies, procedures in relation mill operations, financial, OSH, welfare among others.	



Criterio	on / Indicator	Assessment Findings	Compliance
Criterio	n 4.6.2: Economic and financial viability plan		
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.  - Major compliance -	The annual business plan is available. The document is in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains FFB processed, production of CPO, PK and processing cost. The Component of operating expenditure among others includes;	Complied
		i. Process labor,	
		ii. Maintenance external, maintenance parts,	
		iii. Consumable, EVIT,	
		iv. Admin cost,	
		v. Labor overhead.	
		Inclusive in the business plan is also Capital Expenditure (CAPEX) among others showing expenditure on replacement and purchase of machinery/equipment.	
		The profit and loss statement were made available prepared by the Regional office.	
Criterio	n 4.6.3: Transparent and fair price dealing		
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented.  - Major compliance -	FGV (M) Sdn Bhd has developed "Permohonan Kelulusan Kerja Cungkil BTS" for the contractor to the mill to sign. All the rate and pricing mechanism have been clearly stated in the agreement. Payments are processed and paid by the mill.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		Contract was signed by both parties through "Surat Perintah Kerja" (SPK no: 33014144939/1301072766) The terms and conditions were available as well as the Pricing mechanisms for the products and other services.	
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.  - Major compliance -	The contracts have been detailed out the pricing and the conditions of the FFB to be supplied to the mill. Payment was made promptly by verified the payment vouchers. Sampled of contract agreement that signed by the contractors as below:	Complied
		Hamid Engineering & Enterprise (Renew Contract Letter: (32)FGVT/FFBPD/HQ/01) dated 26/12/2019 valid from 01.01.2020 – 31.12.2020 for FFB sorting contract.	
		Seen the payment vouchers that have been made promptly. Payment vouchers # 352172668 dated 7/12/2020, 511451160 dated 2/9/2020 was sighted.	
Criterio	n 4.6.4: Contractor		
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.	The contractors have acknowledged on a letter regarding the compliance of MSPO requirements and allowed the auditors to inspect relevant documents, operations and interview the workers whenever necessary. They were also briefed by the management	Complied
	- Major compliance -	regarding the MSPO requirements.	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor.	The contractors have signed on the <i>Surat Perintah Kerja</i> (work order) prior to provide services. Seen the contract agreement and details as refer to Criterion 4.6.3.1. Besides, the contractor has	Complied
	- Major compliance -	acknowledged on the approval for the auditor to be inspected if necessary based on letter dated 9/11/2020.	



Criter	on / Indicator	Assessment Findings	Compliance
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.  - Minor compliance -	FGV has agreed for BSI auditors to verify the assessment through a physical inspection if required. The Contractor approve according to letter dated 9/11/2020.	Complied



#### **Appendix B: List of Stakeholders Contacted**

Government Officer:	Community/neighbouring village:
Nil	Representative Sekolah Ulu Penggeli
	Representative Sekolah Bukit Tongkat
Suppliers/Contractors/Vendors:	Worker's Representative/Gender Committee:
Abd Hamid Subakir	Workers representative
	Gender committee



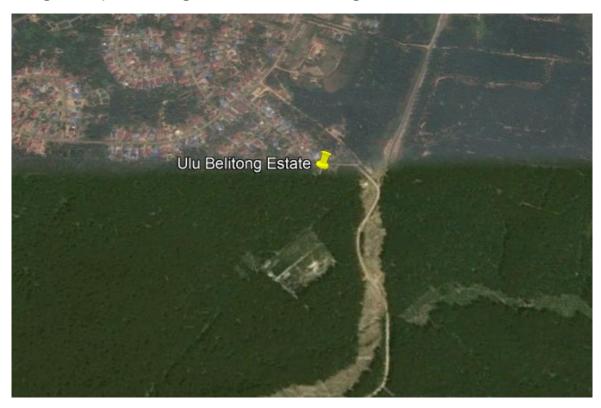
#### **Appendix C: Smallholder Member Details**

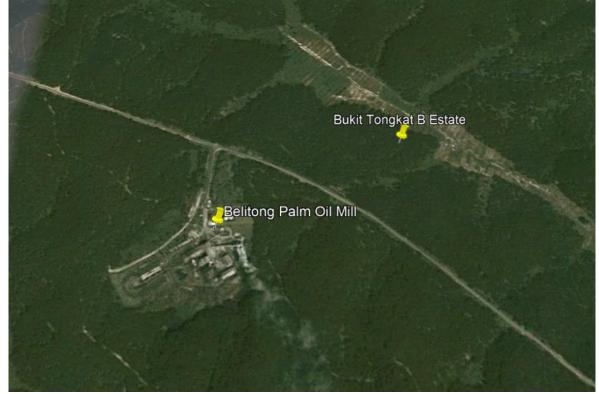
No.	Smallholder		Location of	GPS	Certified	Planted
	Name	MPOB License Number	Planted Area (District)	Coordinates	Area (ha)	Area (ha)
	NA. No smallholders in the scope of certification.					



Appendix D: Location and Field Map

<u>Ulu Belitong Estate, Bukit Tongkat B Estate & Belitong Palm Oil Mill</u>







#### **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