

MALAYSIAN SUSTAINABLE PALM OIL
MSPO OPMC Public Summary Report

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

| |
|--|
| GENTING OIL MILLS (SABAH) SDN BHD |
| Client Company (HQ) Address: 10 th Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia |
| Certification Unit: Genting Jambongan Oil Mill & Genting Jambongan Estate |
| Date of Final Report: 6/10/2022 |

Report prepared by:
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Report Number: 3511548

Assessment Conducted by:
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Section 1: Executive Summary

| 1.1 Organizational Information and Contact Person | | | |
|---|--|-------------------------|--|
| Company Name | Genting Oil Mills (Sabah) Sdn Bhd | | |
| Mill/Estate | Certification Unit | MPOB License No. | Expiry Date |
| | Genting Jambongan Oil Mill | 620052004000 | 28/02/2023 |
| | Genting Jambongan Estate | 509406502000 | 30/11/2022 |
| Address | 10 th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia | | |
| Management Representative | Mr. Arunan Kandasamy – Senior Vice President – Plantation (Malaysia) Mr. James Chung Khim Hon – Senior Vice President – Group Processing Ms. Veronica Lee Shi Shien – Sustainability Executive | | |
| Website | http://www.gentingplantations.com | E-mail | arunan.kandasamy@genting.com |
| | | | james.chung@genting.com veronica.lee@genting.com |
| Telephone | +603 2333 6510 (Head office) | Facsimile | +603 2333 6575 |
| | +089 858350 (GJOM) | | |

| 1.2 Certification Information | | | |
|--|---|--------------------------------|------------|
| Certificate Number | Mill: MSPO 709462 | Certificate Start Date | 09/08/2019 |
| | Estate: MSPO 709464 | | |
| Date of First Certification | 09/08/2019 | Certificate Expiry Date | 08/08/2024 |
| Scope of Certification | <input checked="" type="checkbox"/> Mill: Production of Sustainable Palm Oil and Palm Oil Products <input checked="" type="checkbox"/> Estate: Production of Sustainable Oil Palm Fruits | | |
| Visit Objectives | <ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements | | |
| Standard | <input type="checkbox"/> MSPO MS 2530-2:2013 – General Principles for Independent Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills | | |
| Stage 1 Date | 13 - 14/05/2019 | | |
| Stage 2 / Initial Assessment Visit Date (IAV) | 15 - 16/05/2019 | | |
| Continuous Assessment Visit Date (CAV) 1 | 27 - 28/08/2020 | | |
| Continuous Assessment Visit Date (CAV) 2 | 22 - 23/06/2021: Remote Audit | | |

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|---|-----------------|
| Continuous Assessment Visit Date (CAV) 3 | 20 - 22/06/2022 |
| Continuous Assessment Visit Date (CAV) 4 | - |

1.3 Other Certifications

| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date |
|-----------------------------|--|---------------------------------|-------------|
| EU-ISCC-Cert-DE119-60214826 | International Sustainability & Carbon Certification (EU) | ASG Cert | 30/11/2022 |
| RSPO 709622 | RSPO Principles & Criteria of Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019 | BSI Services Malaysia Sdn. Bhd. | 25/08/2024 |
| MSPO 715401 | MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018. | BSI Services Malaysia Sdn. Bhd. | 26/08/2024 |

1.4 Location of Certification Unit

| Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder) | Site Address | GPS Reference of the site office | |
|--|---|----------------------------------|-------------------|
| | | Latitude | Longitude |
| Genting Jambongan Oil Mill | Jambongan Island, 90100 Beluran District, Sabah, Malaysia | 6° 39' 06.00" N | 117° 26' 43.08" E |
| Genting Jambongan Estate | Jambongan Island, 90100 Beluran District, Sabah, Malaysia | 6° 38' 59.04" N | 117° 27' 03.07" E |

1.5 Certified Area

| Estate | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
|--------------------------|--|--------------|-----------------------------|-----------------|--------------|
| Genting Jambongan Estate | 3,790.14 | 24.36 | 247.80 | 4,062.30 | 93.30 |
| Total (ha) | 3,790.14 | 24.36 | 247.80 | 4,062.30 | 93.30 |

1.6 Plantings & Cycle

| Estate | Age (Years) | | | | | Mature | Immature |
|--------------------------|-------------|---------------|-----------------|----------|----------|-----------------|----------|
| | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 | | |
| Genting Jambongan Estate | - | 506.27 | 3,283.87 | - | - | 3,790.14 | - |
| Total (ha) | - | 506.27 | 3,283.87 | - | - | 3,790.14 | - |

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| 1.7 Certified Tonnage of FFB | | | |
|--|--------------------------------|-----------------------------|-------------------------------|
| Estate | Tonnage / year | | |
| | Estimated (Jul 21 - Jun 22) | Actual (Jun 21 - May 22) | Forecast (Aug 22 - Jul 23) |
| Genting Jambongan Estate | 76,000.00 | 70,076.72 | 68,300.00 |
| Bahagia Jaya ₁ | - | 8,022.42 | 7,990.00 |
| Roziah Haririz ₂ | - | 77.58 | 69.00 |
| Koh Shuk Kien ₂ | - | 519.01 | 490.00 |
| Total (mt) | 76,000.00 | 78,695.73 | 76,849.00 |
| Note: | | | |
| 1: MSPO Part 3 Cert. # CU-MSPO MS2530-3-868130; Validity period: 31/12/2019 - 30/12/2024 | | | |
| 2: MSPO Part 2 Group Cert. # BVC-MSPO-0018; Validity period: 11/03/2019 – 10/03/2024 | | | |

| 1.8 Uncertified Tonnage of FFB | | | |
|---------------------------------------|--------------------------------|-----------------------------|-------------------------------|
| Estate | Tonnage / year | | |
| | Estimated (Jul 21 - Jun 22) | Actual (Jun 21 - May 22) | Forecast (Aug 22 - Jul 23) |
| Yazid Sarip Rahman | - | 35.20 | 30.00 |
| Norlia Binti Abdul Wahid | - | 0.26 | 10.00 |
| Abdul Rauf Bin Jalil | - | 3.73 | 15.00 |
| Mohd Najjar Bin Abdul Razak | - | 10.36 | 25.00 |
| Total (mt) | - | 49.55 | 80.00 |

| 1.9 Certified Tonnage | | | |
|------------------------------|------------------------------------|-----------------------------|-------------------------------|
| | Estimated (Jul 21 - Jun 22) | Actual (Jun 21 - May 22) | Forecast (Aug 22 - Jul 23) |
| | Mill Capacity: 20 MT/hr | FFB | FFB |
| 76,000.00 | | 78,695.73 | 76,849.00 |
| SCC Model: MB | CPO (OER: 22.70 %) | CPO (OER: 22.06 %) | CPO (OER: 21.70 %) |
| | 17,250.00 | 17,362.74 | 16,676.23 |
| | PK (KER: 3.34 %) | PK (KER: 4.13 %) | PK (KER: 4.00 %) |
| | 2,535.00 | 3,250.70 | 3,073.96 |

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| 1.10 Actual Sold Volume (CPO) | | | | | |
|--------------------------------------|----------------|-------------------------|----------|--------------|-----------|
| CPO (mt) | MSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | RSPO | | |
| 17,362.74 | - | 9,500.00 | 7,000.00 | - | 16,500.00 |

| 1.11 Actual Sold Volume (PK) | | | | | |
|-------------------------------------|----------------|-------------------------|----------|--------------|----------|
| PK (mt) | MSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | RSPO | | |
| 3,250.70 | - | 2,000.00 | 1,000.00 | - | 3,000.00 |

Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI 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 20-22/06/2022. The audit programme is included as Section 2.4. The approach to the audit was to treat the Genting Jambongan Oil Mill (GJOM) and Genting Jambongan Estate (GJBE) 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 Certification Unit were not using MSPO certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSPO Logo and related claims.

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 was 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 (1). The sampled smallholder listed in Appendix B.

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 Section 3.6.

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.

All the previous nonconformities are remains closed. The assessment findings from the initial assessment are detailed in Section 4.2. Since Major NCs were considered as low risks and corrective actions accepted able to be verified off-site, hence CAP evidences were submitted by client via email for verification.

This report was externally reviewed by MSPO approved Peer Reviewer prior to certification and recertification decision by BSI. For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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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) |
| Genting Jambongan Oil Mill | ✓ | ✓ | ✓ | ✓ | ✓ |
| Genting Jambongan Estate | ✓ | ✓ | ✓ | ✓ | ✓ |

Tentative Date of Next Visit: July 3, 2023 - July 5, 2023

Total No. of Mandays: 7

2.1 BSI Assessment Team

| Team Member Name | Role <i>(Team Leader or Team member)</i> | Qualifications <i>(Short description of the team members)</i> |
|--------------------------------|---|---|
| Hafriazhar Mohd. Mokhtar (HMM) | Team Leader | <p>Education: Holds a Bachelor of Engineering (Hons.) Chemical Engineering, University Technology Malaysia.</p> <p>Work Experience: He has more than 20 years of working experience in multiple engineering disciplines emphasized on science, technology and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation and mining before shifted into auditing. In short, his career began as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in plantation, Project Control Engineer (2008-2011) in mining and Auditor/Client Manager (2011-present) in certifications auditing.</p> <p>Training attended: He has completed Social Auditing & SMETA Training, HCV and GIS Training, ISO 45001 LA Training, MSPO LA Training, Endorsed RSPO SCCS LA Training, Endorsed RSPO P&C LA Training, ISO 9001 LA Training, ISO 50001 LA Training, and ISO 14001 LA Training.</p> <p>Aspect covered in this audit: During this assessment he assessed the aspects of Legal, mill & estate best practices, traceability, biodiversity and environment requirements.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English.</p> |
| Valence Shem (VSH) | Team Member | <p>Education: Holds a Bachelor of Technology BTech (Hons.) Industrial Technology, University of Science Malaysia.</p> <p>Work Experience: He has more than 20 years of working experience with 9 years in oil palm plantation industry and 13 years in management system auditing since 2009 for various standards such as ISO 14001, RSPO P&C, RSPO SCCS, MSPO and SMETA.</p> |

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| | | |
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| | | <p>Training attended: He has completed ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Assessor Course, MSPO Awareness Training, ISO 45001 Lead Auditor Course, SMETA Auditor training, HCV-HCS training and RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course.</p> <p>Aspect covered in this audit: During this assessment he assessed the aspects of Legal, social aspects, employee’s welfare and stakeholders’ consultations & communications requirements.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English.</p> |
| <p>Nor Halis Abu Zar (NHA)</p> | <p>Team Member</p> | <p>Education: Holds a Bachelor of Science in Plantation Technology and Management, University Technology Mara.</p> <p>Work Experience: He has 6 years’ experience in Oil Palm Estate Management with Kulim Plantations Sdn. Bhd. The last position held was Assistant Manager. His experience includes the day-to-day estate operations and ensures the implementation of RSPO, ISCC and MSPO certification. He is a qualified Lead Auditor for MSPO and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p>Training attended: He has completed ISO IMS 9001 and 14001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor Course, ISO 45001 Lead Auditor Course, ISO 9001:2015 Lead Auditor Course, MSPO SCCS Auditor Course and SMETA Requirement Training.</p> <p>Aspects covered in this audit: During this assessment, he assessed on the aspects of Legal, mill & estate best practices, traceability and occupational safety.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English.</p> |

2.2 Impartiality and conflict of interest

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

2.3 Accompanying Persons

| No. | Name | Role |
|-----|------|------|
| | N/A | |

2.4 Assessment Plan

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

| Date | Time | Subjects | HMM | VSH | NHA |
|--|------------------|---|-----|-----|-----|
| Sunday 19/6/2022 | PM | Audit Team Travelling | ✓ | ✓ | ✓ |
| Monday 20/6/2022 Genting Jambongan Estate | 09:00 - 09:30 | Opening Meeting (with RSPO) <ul style="list-style-type: none"> • Presentation by client • Presentation by BSI Lead Auditor – introduction of team member and assessment agenda • Confirmation of assessment scope and finalizing audit scope | ✓ | ✓ | ✓ |
| | 09:30 - 12:30 | Genting Jambongan Estate <ul style="list-style-type: none"> • Estate assessment: Field visit, field operations e.g. harvesting, spraying, manuring, nursery, water treatment, genset, staff & workers interview, boundary inspection, buffer zone, HCV area, IPM implementation, landfill etc. • Workstation & facilities visit, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, scheduled waste management, worker housing, clinic etc. | ✓ | ✓ | ✓ |
| | 12:30 - 13:30 | Lunch break | ✓ | ✓ | ✓ |
| | 13:30 - 16:30 | Genting Jambongan Estate 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 | ✓ | ✓ | ✓ |
| | 16:30 - 17:00 | Interim closing meeting | ✓ | ✓ | ✓ |
| Tuesday 21/6/2022 Genting Jambongan Estate & Genting Jambongan Oil Mill | 09:00 - 12:30 | Genting Jambongan Estate <ul style="list-style-type: none"> • Continue with field & facilities visit • Continue documentation review | ✓ | ✓ | ✓ |
| | 12:30 - 13:30 | <ul style="list-style-type: none"> • Lunch break • Audit team move to Genting Jambongan Oil Mill | ✓ | ✓ | ✓ |
| | 13:30 - 16:30 | Genting Jambongan Oil Mill 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, | ✓ | ✓ | ✓ |

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| Date | Time | Subjects | HMM | VSH | NHA |
|--|---------------|---|-----|-----|-----|
| | | natural resources, biodiversity and ecosystem services, P6: Best practices | | | |
| | 16:30 - 17:00 | Interim closing meeting | ✓ | ✓ | ✓ |
| Wednesday 22/6/2022 Genting Jambongan Oil Mill | 09:00 - 12:30 | Genting Jambongan Oil Mill Mill visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc. | ✓ | ✓ | ✓ |
| | 10:00 - 12:00 | Meeting with stakeholders - Government, village rep, smallholders, Union Leader, contractor etc. (with RSPO) | - | ✓ | - |
| | 12:30 - 13:30 | Lunch break | ✓ | ✓ | ✓ |
| | 13:30 - 16:00 | Genting Jambongan Oil Mill MSPO SCCS audit (refer MSPO SCCS plan) | ✓ | ✓ | ✓ |
| | 16:00 - 16:30 | Audit team discussion & preparation for closing meeting | ✓ | ✓ | ✓ |
| | 16:30 - 17:00 | Closing meeting Presentation of findings by BSI Lead Auditor | ✓ | ✓ | ✓ |

Section 3: Assessment Findings

3.1 Details of audit results

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

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

3.2 Details of Nonconformities and Opportunity for improvement

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

During the assessment there were three (3) Major & two (2) Minor nonconformities and one (1) OFI raised. The Genting Jambongan Oil Mill (GJOM) and Genting Jambongan Estate (GJBE) 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. The below is the summary of the non-conformity raised during this assessment.

| Non-Conformity Report | | | |
|------------------------------------|--|---|---------------------------------|
| NCR Ref #: | 2214234-202206-M1 | Issue Date: | 22/06/2022 |
| Due Date: | 19/09/2022 | Date of Closure: | 19/09/2022 |
| Area/Process: | Genting Jambongan Oil Mill | Clause & Category: (Major / Minor) | MSPO 2530 Part 4: 4.5.1.1 Major |
| Clause Requirements: | An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. | | |
| Statement of Nonconformity: | An environmental management plan in line with the relevant environmental laws established, was ineffectively implemented. | | |
| Objective Evidence: | Evidence of implementation on compliance to legal requirements for: <ol style="list-style-type: none"> 1. There was no Written Notification made to Department of Environment under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 for one unit of Fume Cupboard located in Laboratory of Genting Jambongan POM. 2. Genting Jambongan POM has not appointed any Competent Person for Scheduled Waste Management (CepSWAM) as required by License No. 005264, valid from 01/07/21-30/06/22. | | |

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| | <p>3. Environmental Audit as required by License No. 005264 valid from 01/07/21-30/06/22 (No. 21. to be conducted 2 times a year). Currently only conducted once conducted as Environmental Audit Report dated 21/04/22.</p> |
| Corrections: | <ol style="list-style-type: none"> 1. As the submission requires professional endorsement on the design, GJOM will proceed to obtain quotation and approval on the submission. 2. The current Acting Mill Manager will be registered for CePSWaM course in this year 2022. Scheduled class is available in October 2022. 3. Proceed with approval after obtaining another quotation and proceed to engage The Best Solution as our third-party auditor. |
| Root cause analysis: | <ol style="list-style-type: none"> 1. The requirement for Fume Hood Notification to DOE not complied due to the requirement was not stated at the mill Legal Register. The mill PIC also not checking the requirements with DOE. 2. Since the previous Mill Manager is transferred to other OU, there is no competent person for CePSWaM in this mill. 3. Late in obtaining another quotation besides R & K consultancy as company required minimum 2 quotations. |
| Corrective Actions: | <ol style="list-style-type: none"> 1. To update the LRR by add in requirement for Fume Hood Notification to DOE. 2. In future, mill will proceed to register a PIC for CePSWaM if the current active PIC is transferred to other OU or replaced. 3. To prepare schedule for the Environmental Audit as monitoring tools together with other environmental compliance requirements. |
| Assessment Conclusion: | <p>CAP has been accepted with evidence verified as following:</p> <ol style="list-style-type: none"> 1. Request Unbudgeted Capex Approval; Ref. GENP/Processing/Evaluation – To purchase 1-unit Fume Hood for Laboratory; Date: 25/07/2022 for Quotations by Dynakey Laboratories Sdn. Bhd.; Ref. DL/SDK/0622/125; Date: 22/6/2022 and by Maju Perkasa Sdn. Bhd.; Ref. MP3025_2205QTN; Date: 11/6/2022 2. Competent Environmental Personnel of Scheduled Waste Management (CePSWAM) training enrolment for Mr. Yee Chee Fui, Acting Mill Manager; Date: 10-14/10/2022; Training provider: Airwastewater Management Sdn. Bhd. 3. Submission form prepared for Notification to DOE for Fume Hood on date upon completion of Lab Fume Hood installation 4. Updated GJOM List of Licenses, Written Approvals and Permits, Competency & Legal Monitoring; Date: 11/8/2022 with evaluation of compliance monitoring 5. Appointment of The Best Solution Management Sdn. Bhd. as consultant for Environmental Compliance Audit Service as per quotation ref. SB2022/QUO/023; Date: 17/2/2022 <p>The evidence of corrections and corrective actions were found to be effective to address the non-conformity. Hence, Major NC is closed on 19/09/2022. Continuous effective implementation of the corrective action shall be verified in the next assessment visit.</p> |

| Non-Conformity Report | | | |
|-----------------------|-------------------|-------------------------|------------|
| NCR Ref #: | 2214234-202206-M2 | Issue Date: | 22/06/2022 |
| Due Date: | 19/09/2022 | Date of Closure: | 19/09/2022 |

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|------------------------------------|---|---|---------------------------------|
| Area/Process: | Genting Jambongan Oil Mill | Clause & Category: (Major / Minor) | MSPO 2530 Part 4: 4.6.1.1 Major |
| Clause Requirements: | Standard operating procedures shall be appropriately documented and consistently implemented and monitored. | | |
| Statement of Nonconformity: | Standard Operating Procedures at Diesel Tank and Workshop were not effectively implemented. | | |
| Objective Evidence: | <p>Diesel was stored in the drinking water bottle. During site visit at Diesel Tank, it was found 1 unit of empty drinking water bottle were stored with diesel oil. It was not in line with SOP Handling on Chemicals and Oils with reference No: GJOM-SOP-STO-02 dated 01/05/2014 Section 3.6 "Gunakan Bekas yang sesuai yang di label di gunakan jika hendak mengambil bahan kimia/minyak"</p> <p>During site visit at workshop area, it was found flash back arrestor was install only for Acetylene but not at Oxy gas tank. It was against SOP Kerja Penggunaan Oxy – Acetylene with reference No: GJOM-SOP-MNT-03 dated 25/10/2016 Section 2.2 (e) Pastikan "Flash Back Arrestor telah di pasang dan ianya berfungsi dengan baik".</p> | | |
| Corrections: | <ol style="list-style-type: none"> 1. The use of drinking water bottle for diesel storage will be stop immediately. 2. Immediately install a Flash Back Arrestor on the said Acetylene Tank. | | |
| Root cause analysis: | There is no monitoring done by the Mill management on SOP requirements. | | |
| Corrective Actions: | <ol style="list-style-type: none"> 1. Re-briefing to all the workers on both of the SOP's. This briefing will be done, defaulted every 6 months as per stated in the Mill annual training program. 2. Mill will provide a dedicated diesel gallon and workers will be brief to use the dedicated diesel gallon for small amount of diesel transit within the mill premises. 3. Workshop personnel will be brief regarding Flash Back Arrestor must be installed on both Acetylene and Oxygen Tank before putting to used. | | |
| Assessment Conclusion: | <p>CAP has been accepted with evidence verified as following:</p> <ol style="list-style-type: none"> 1. Replacement of all unauthorized water bottle for diesel storage with diesel gallon container for small amount of diesel transit use 2. Installation of flashback arrestor of acetylene tank upon received of purchase dated on 23/8/2022 3. Re-briefing to store attendant on Handling of Chemicals and Oils SOP (GJOM-SOP-STO-02) on 23/8/2022 by mill management and sustainability team 4. Re-briefing to all mill workshop personnel on Oxy-Acetylene Usage SOP (GJOM-SOP-MNT-03) on 23/8/2022 by mill management and sustainability team <p>The evidence of corrections and corrective actions were found to be effective to address the non-conformity. Hence, Major NC is closed on 19/09/2022. Continuous effective implementation of the corrective action shall be verified in the next assessment visit.</p> | | |

| Non-Conformity Report | | | |
|------------------------------|--------------------------|---|------------------------------------|
| NCR Ref #: | 2214234-202206-M3 | Issue Date: | 22/06/2022 |
| Due Date: | 19/09/2022 | Date of Closure: | 19/09/2022 |
| Area/Process: | Genting Jambongan Estate | Clause & Category: (Major / Minor) | MSPO 2530 Part 3: 4.4.4.2(d) Major |

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| <p>Clause Requirements:</p> | <p>The occupational safety and health plan shall 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).</p> |
| <p>Statement of Nonconformity:</p> | <p>HIRARC risk control was not accordance to Standard Operating Procedure and PPE usage at manuring area was not effectively implemented.</p> |
| <p>Objective Evidence:</p> | <p>Document verification found that HIRARC for Workshop dated 08/02/2018 – Cutting and Bending Machine stated on Risk Control – SOP, Training and PPE (Goggle, Nitrile Glove, Wellington Boots, Approved Respirator and Apron) however it was not in line SOP Revision 3 dated 11/10/2013, “Langkah-Langkah Perlu Di Patuhi Di Bengkel” section 2.0 PPE - "Leather Gloves, Safety Boots"</p> <p>During site visit at Block 45, Manuring application were conducted by 13 female workers. Fertilizer type was Mixture NK Mix. Based on site verification found PPE used were Nitrile Gloves, Apron, and Shoes however none of them were wear chemical goggles for eye protection as required by Safety Data Sheet Mixture NK 10.5-30 section 8.2, SOP Revision 3 dated 11/10/2013 section 2.0 (Langkah-Langkah Penaburan Baja – PPE) and HIRARC Manual Fertilizer Application dated 08/02/2018.</p> |
| <p>Corrections:</p> | <ol style="list-style-type: none"> 1. The HIRARC for cutting and bending machine will be review against the SOP so that both will be parallel. 2. The manuring gang will be provided with the chemical goggle and will be re-training on usage of PPE in manuring application as per the SOP, HIRARC and SDS. |
| <p>Root cause analysis:</p> | <ol style="list-style-type: none"> 1. The HIRARC for cutting and bending machine was not properly reviewed. 2. PPE training given to manuring gang was not effective. |
| <p>Corrective Actions:</p> | <ol style="list-style-type: none"> 1. A review will be done to the SOP once there is a significant change of risk in the HIRARC. 2. Field supervisor and head gang will be making sure each manuring worker will be fully equipped with PPE as per SOP, HIRARC and SDS before start work. |
| <p>Assessment Conclusion:</p> | <p>CAP has been accepted with evidence verified as following:</p> <ol style="list-style-type: none"> 1. Records of HIRARC review for cutting and bending machine dated on 12/8/2022 2. Records of relevant PPE issuance to all manuring gang workers dated on 16/8/2022 3. Re-briefing all manuring gang workers on SOP and HIRARC for Manual Fertilizer Application by estate management and sustainability team dated on 17/8/2022 4. Records of daily PPE monitoring of all manuring gang workers latest dated on 17/8/2022 <p>The evidence of corrections and corrective actions were found to be effective to address the non-conformity. Hence, Major NC is closed on 19/09/2022. Continuous effective implementation of the corrective action shall be verified in the next assessment visit.</p> |

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| Non-Conformity Report | | | |
|------------------------------------|---|---|----------------------------------|
| NCR Ref #: | 2214234-202206-N1 | Issue Date: | 22/06/2022 |
| Due Date: | Next assessment | Date of Closure: | Open |
| Area/Process: | Genting Jambongan Estate | Clause & Category: (Major / Minor) | MSPO 2530 Part 3: 4.4.5.11 Minor |
| Clause Requirements: | In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. | | |
| Statement of Nonconformity: | The frequency of analysis of the treated water was not carried out according to the procedure. | | |
| Objective Evidence: | The treated water analysis for the labour quarters at Block 4, Jambongan Estate was only carried out twice in 2021 [report ref.: #W210225/10 (dated 25/02/2021) and #W211111/01B (dated 11/11/2021)]. This is not in compliance with Clause 4.3 of the GPB's SMPM Water Sampling and Analysis (doc. no.: SMP-GPB-15, rev. 01, dated 12/11/2014) which requires the analysis to be carried out on a quarterly basis. | | |
| Corrections: | Estate will conduct the drinking water analysis on quarterly basis as per SMPM. | | |
| Root cause analysis: | There is no monitoring done by the estate management on the requirements. | | |
| Corrective Actions: | Monitoring will be done based on sustainability annual programme plan which is samples for water source will be twice a year and sample for treated water will be every quarterly. This scheduled will be covering all water treatment that available in the estate. | | |
| Assessment Conclusion: | CAP has been accepted. Evidence of accepted CAP implementation will be verified its effectiveness during next assessment. | | |

| Non-Conformity Report | | | |
|------------------------------------|--|---|----------------------------------|
| NCR Ref #: | 2214234-202206-N2 | Issue Date: | 22/06/2022 |
| Due Date: | Next assessment | Date of Closure: | Open |
| Area/Process: | Genting Jambongan Oil Mill | Clause & Category: (Major / Minor) | MSPO 2530 Part 4: 4.4.5.11 Minor |
| Clause Requirements: | In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. | | |
| Statement of Nonconformity: | The frequency of analysis of the treated water was not carried out according to the procedure. | | |
| Objective Evidence: | The treated water analysis for the mill's labour quarters was only carried out three times in 2021 [report ref.: #W210121/04 (dated 21/01/2021), #W210527/01 (dated 27/05/2021) and #W211028/01 (dated 28/10/2021)]. This is not in compliance with Clause 4.3 of the GPB's SMPM Water Sampling and Analysis (doc. no.: SMP-GPB-15, rev. 01, dated 12/11/2014) which requires the analysis to be carried out on a quarterly basis. | | |
| Corrections: | Mill will conduct the drinking water analysis on quarterly basis as per SMPM. | | |

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| Root cause analysis: | There is no monitoring done by the mill management on the requirements. |
| Corrective Actions: | Monitoring will be done based on sustainability annual programme plan which is samples for water source will be twice a year and sample for treated water will be every quarterly. |
| Assessment Conclusion: | CAP has been accepted. Evidence of accepted CAP implementation will be verified its effectiveness during next assessment. |

| Opportunity For Improvement | | | |
|------------------------------------|---|----------------|---------------------------|
| Ref: | 2214234-202206-I1 | Clause: | MSPO 2530 Part 3: 4.5.3.2 |
| Area/Process: | Genting Jambongan Estate | | |
| Objective Evidence: | Improving the efficiency of resource utilization and recycling of wastes or converting them into value-added by-products for used drum in Jambongan Estate could be improved further. | | |

| Noteworthy Positive Comments | |
|-------------------------------------|--|
| 1 | Good cooperation by management team/staff/sustainability team |
| 2 | Good documentation upkeep and retrieval |
| 3 | Good housekeeping at working places e.g. workshop, storage, etc. |

3.3 Status of Nonconformities Previously Identified and OFI

| Non-Conformity Report | | | |
|------------------------------------|--|---|------------------------------------|
| NCR Ref #: | 2071425-202106-M1 | Issue Date: | 23/06/2021 |
| Due Date: | 21/09/2021 | Date of Closure: | 21/09/2021 |
| Area/Process: | Genting Jambongan Oil Mill | Clause & Category: (Major / Minor) | MSPO 2530 Part 4: 4.4.4.1 Major |
| Clause Requirements: | An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. | | |
| Statement of Nonconformity: | Lack of evidence in addressing the CHRA recommendation. | | |
| Objective Evidence: | <p>The mill has its CHRA report dated 10/12/2019 [report ref. no.: RSSB/CHRA/2019-156]. Based on the report, the assessor had recommended to carry out the following in page 35 of the report:</p> <ul style="list-style-type: none"> To continue the existing medical surveillance programme conducted by DOSH registered OHD for work unit Laboratory Attendant for n-hexane, Potassium Dichromate and Chromic Acid and work unit Mechanical Fitters for Welding Fumes at intervals of not more than 12 months. To conduct additional medical surveillance programme conducted by DOSH registered OHD for work unit Mechanical Fitters, Engine Drivers and General Worker for Mineral Oil at intervals of not more than 12 months. | | |

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| | However, there was no evidence to show that the above recommendations have been addressed. |
| Corrections: | <p>Mill to refer back to the appointed OHD to reconfirm the medical surveillance program. Once conformed, mill will send all the workers to the OHD clinic for medical surveillance instead of waiting for the OHD to visit the island.</p> <p>If otherwise, Mill will get other OHD's company quotation for medical surveillance. Once obtained and approved, mill will send all the workers to the OHD clinic for medical surveillance instead of waiting for the OHD to visit the island.</p> |
| Root cause analysis: | There is no CHRA action plan and monitoring done by the mill management to ensure that this recommendation is comply. |
| Corrective Actions: | <p>SHO will conduct a refresh briefing regarding the CHRA recommendation to the mill management so that the CHRA action plan will be produce and monitoring on the action plan will be done.</p> <p>Medical surveillance program for mill will be conducted as per CHRA requirement.</p> <p>SHO will follow up on the progress of the CHRA action plan in monthly visit and in the next Internal Audit for MSPO in the mill.</p> |
| Assessment Conclusion: | <p>Evidence verified:</p> <ol style="list-style-type: none"> 1) Medical Surveillance report dated 03/08/2021 by an OHD [Reg. no.: HQ/12/DOC/00/259] that shows four employees i.e. Laboratory Assistant, Workshop Apprentice, Engine Driver and Store Attendant, who are exposed to either chromium, n-Hexane, manganese, or mineral oil at their workstations, have undergone medical check-up on 28/07/2021. The results showed that they were all fit to work. 2) Medical Surveillance report dated 26/08/2021 by an OHD [Reg. no.: HQ/16/DOC/00/557] that shows four employees, who are exposed to either diesel, kerosene, hydraulic & engine oil, or chemicals used in mill laboratory, at their workstations, have undergone medical check-up on 04/08/2021. The results showed that they were all fit to work. 3) Briefing record to show that a refresher briefing regarding the CHRA recommendation to the mill management so that the CHRA action plan will be produced and monitoring on the action plan will be done. The briefing was conducted on 26/08/2021 by the SHO and attended by 26 participants from various departments such as the management, workshop, electrical, administration, store, and laboratory to name a few. 4) Revised CHRA action plan dated 23/09/2021 where medical surveillance for the relevant employees has been included. 5) Medical surveillance programme dated 23/09/2021 as per CHRA requirement that shows the annual programme of medical surveillance to be conducted for the relevant employees. 6) Record dated 26/08/2021 that shows the SHO had followed-up the progress of the CHRA action plan during monthly visit. <p>The evidence of correction and corrective actions were found to be adequate and therefore, the non-conformity is closed on 21/09/2021. Continuous effective implementation of the corrective action shall be verified in the next assessment visit.</p> |

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| Verification Statement: | <p>ASA 3 Verification:</p> <p>Chemical Health Risk Assessment (CHRA) was conducted in compliance with Occupational Safety and Health (USECHH) regulation 2000 on 10/12/2019 by Rehpro Scientific Sdn Bhd. The report RSSB/CHRA/2019-156 was available for verification.</p> <p>Medical Surveillance was conducted to establish workers health status when they work in an environment where they are exposed to particular hazards such a Manganese. The mill has conducted the medical surveillance on 28/07/2021 for 4 workers at Klinik Mabello (Paris) Sdn Bhd where no workers were needed for Medical Removal Protection (MRP) due to health hazardous side effect. The next medical surveillance was due on 04/08/2022. There are 3 workers recommended for further medical attention due to have some non-occupational related medical conditions. Management has sent for further check up on 22/12/2021 to OHD from Mabello Groups of Clinics. Management has proposed to conduct the next medical surveillance on 06/07/2022 as per letter evidence from Klinik Mabello (Paris) Sdn Bhd dated 21/06/2022.</p> <p>Hence, Major NC remain closed.</p> |
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| Non-Conformity Report | | | |
|------------------------------------|--|---|--------------------------------|
| NCR Ref #: | 2071425-202106-M2 | Issue Date: | 23/06/2021 |
| Due Date: | 21/09/2021 | Date of Closure: | 21/09/2021 |
| Area/Process: | Genting Jambangan Estate | Clause & Category: (Major / Minor) | MSPO 2530 Part 3:4.4.5.4 Major |
| Clause Requirements: | 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. | | |
| Statement of Nonconformity: | The employment contract was incomplete/ not available and no evidence to show that the EPF & SOSCO contribution was made as per legal requirement. | | |
| Objective Evidence: | <p>Sampled of workers for FFB transporters as below:</p> <p>a. Contractor: Pengangkutan Yee Kiun Worker: Jolius Gilbert</p> <p>i. Interviewed with the contractor confirmed that he did not make any SOCSO contribution for the worker above.</p> <p>ii. Besides, no employment contract was given to the worker as informed by the contractor.</p> <p>iii. No detail of number of working days mentioned in the payslip.</p> <p>b. Contractor: Syarikat Raihan Worker: Misran</p> <p>i. No detail of number of working days mentioned in the payslip.</p> <p>ii. Employment contract was incomplete where terms & conditions were not clearly stated such as annual leave entitlement, public holiday entitlement, period of notice, medical leave entitlement, rest day and etc.</p> | | |

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| | <p>iii. No evidence to show that EPF and SOCSO contribution has been made for the worker.</p> <p>This non-conformity raised as Major due to escalate of Minor NC# 1945766-202002-N1.</p> |
| Corrections: | <p>Sustainability Dept. will conduct a refresh briefing regarding this requirement to the estate management so that the monitoring will be done in monthly basis without any misses.</p> <p>Estate management will conduct briefing on these requirement as per stated in the contractor’s agreement, to all the contractors that currently working with the estate. These requirements also will be brief thoroughly when new contractor signing with the estate, if any.</p> <p>Sustainability Department will monitor this compliance in monthly basis and in the next RSPO Internal audit.</p> |
| Root cause analysis: | <p>There is no monitoring done by the estate management to ensure that this condition is comply by the contractors.</p> |
| Corrective Actions: | <p>For Pengangkutan Yee Kiun</p> <ol style="list-style-type: none"> The said worker will registered in SOCSO, and the contribution will be started after registration succeeded. Estate will assist to prepare the sample format of complete workers agreement and format of complete payslip for the contractor. Once finalize and agreed, the contractor will use this agreement and the payslip for all their workers. <p>For Raihan Jaya</p> <ol style="list-style-type: none"> Estate will assist to prepare the sample format of complete workers agreement and format of complete payslip for the contractor. Once finalize and agreed, the contractor will use this agreement and the payslip for all their workers. The said worker will registered with SOCSO and KWSP, and the contribution will be started after registration succeeded. |
| Assessment Conclusion: | <p>Evidence verified:</p> <p>The contractor of Pengangkutan Yee Kiun submitted the application of SOCSO account and received by PERKESO Kota Marudu on 07/09/2021. The payment will be made right after the approval letter for registration issued by PERKESO. Seen the Akuan Terima dan Notis Makluman. Payment vouchers dated 06/08/2021 where the contractor has made underpaid wages to the sampled worker from September 2020 to May 2021 were sighted. A total of RM 1,805.48 was paid to the worker. The worker has acknowledged on the received payment. The worker has signed on the employment contract with terms and conditions of the employment were clearly stated.</p> <p>A copy of the employment contract was reviewed. In additional, reviewed the payslips for June 2021 to August 2021 found that information such as number of normal working day, number of works on rest day, number of works on public holiday, absent and medical leave was outlined in the payslip of the worker.</p> <p>For Syarikat Raihan Jaya, the contractor has made payment for the underpaid wages from September 2020 to May 2021 to the sampled worker on 06/07/2021. A total of RM 637.33 was paid to the worker with acknowledgement of recipient.</p> |

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| | <p>The sampled worker has tendered resignation on 29/06/2021 and seen the resignation letter from the worker due to personal reason. Currently, the contractor himself work as driver to transport the FFB. Seen the FFB Despatch Ticket # FFB21003071W dated 02/07/2021 and verified the Trading License confirmed that the work was carried out by the contractor.</p> <p>A briefing with the contractors was conducted on 06/07/2021 to brief on the non-conformance and action to be taken by the contractors. Seen the attendance list and photo evident of the briefing conducted. The estate’s management has carried out monitoring of Contractor’s Due Diligence on monthly basis. Seen the Contractor’s Due Diligence Monthly Monitoring Form for July 2021 and August 2021 where the details of monitoring such as workers’ persona details, workers agreement, workers insurance policy and payslips are submitted to the management by contractors on monthly basis.</p> <p>The monitoring report will be verified by Senior Assistant Manager and approved by Estate Manager.</p> <p>The evidence of correction and corrective actions were found to be adequate and therefore, the non-conformity is closed on 21/09/2021.</p> |
| Verification Statement: | <p>ASA 3 Verification:</p> <p>The management has ensured the employees of the contractors were paid based on legal and employment agreement through obtaining the pay slips of the employees on monthly basis. Among the elements checked by the management are wages, EPF and SOCSO. Through verification of the sampled workers’ pay slips (Oct 2021, Feb 2022, and May 2022) of the sampled contractors (Yee Kiun and Syarikat CM), the wages paid were in line with the legal minimum wage. The EPF and SOCSO were also correctly contributed according to the legal requirements.</p> <p>Hence, Major NC remain closed.</p> |

| Opportunity For Improvement | | | |
|------------------------------------|---|----------------|---------------------------|
| Ref: | 2071425-202106-I1 | Clause: | MSPO 2530 Part 3: 4.2.1.1 |
| Area/Process: | Genting Jambongan Estate | | |
| Objective Evidence: | The retrieval of detailed action plans for issues raised during stakeholder meeting and workers’ committee meeting can be further improved. | | |
| Verification Statement: | <p>ASA 3 verification:</p> <p>Genting Oil Mills (Sabah) Sdn Bhd has developed Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 23/02/2018 for the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties. Meeting shall be carried out at least six monthly and annually for internal and external stakeholders. The topics to be discussed such as complaint & grievances, environmental and biodiversity concerns, social issue, and suggestions for improvement. The procedure has been briefed to the internal and external stakeholders. Briefing to the external stakeholders was conducted during the stakeholder meeting conducted on 14/05/2022. Issues raised and actions taken during the stakeholders meeting were well recorded in a management plan and made available for verification.</p> | | |

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| Opportunity For Improvement | | | |
|------------------------------------|--|----------------|---------------------------|
| Ref: | 2071425-202106-I2 | Clause: | MSPO 2530 Part 3: 4.4.4.2 |
| Area/Process: | Genting Jambongan Estate | | |
| Objective Evidence: | <p>The following issues can be further improved:</p> <ol style="list-style-type: none"> 1) The provision of specific PPE in accordance with CHRA report e.g., R95 respiratory for welder 2) Reviewing the scoring of HIRARC based on new information obtained from accident especially on severity level 3) Providing recorded evidence of implementation of corrective or preventive measures identified in the accident investigation report | | |
| Verification Statement: | <p>ASA 3 verification:</p> <ul style="list-style-type: none"> • PPE checked for welder (Foreman) found that respiratory for welder type R95 were used. • HIRARC was not reviewed yet even though there are accident-related workstation recorded. • The accident investigation record was maintained, reviewed in the OSH meeting and consists of implementation and preventive measures. Refer Sample Investigation Meeting dated 22/10/2021 refer section Recommendation for Corrective or Preventive Measures. • The Major NC was raised in this indicator due to non-conformity found in the same indicator. | | |

3.4 Summary of the Nonconformities and Status

| CAR Ref. | Clause & Category (Major / Minor) | Issued Date | Status & Date (Closure) |
|-------------------|-----------------------------------|-------------|-------------------------|
| 1777443-201904-N1 | MSPO Part 4: 4.3.1.1 Minor | 16/05/2019 | Closed on 28/08/2020 |
| 1777443-201904-N2 | MSPO Part 4: 4.4.4.2 Minor | 16/05/2019 | Closed on 28/08/2020 |
| 1777443-201904-N3 | MSPO Part 3: 4.4.5.6 Minor | 16/05/2019 | Closed on 28/08/2020 |
| 1777443-201904-N4 | MSPO Part 3: 4.4.5.11 Minor | 16/05/2019 | Closed on 28/08/2020 |
| 1945766-202002-N1 | MSPO Part 3: 4.4.5.4 Minor | 28/08/2020 | Escalated to Major |
| 1945766-202002-N2 | MSPO Part 4: 4.4.5.4 Minor | 28/08/2020 | Closed on 23/06/2021 |
| 2071425-202106-M1 | MSPO Part 4: 4.4.4.1 Major | 23/06/2021 | Closed on 21/09/2021 |
| 2071425-202106-M2 | MSPO Part 4: 4.4.5.4 Major | 23/06/2021 | Closed on 21/09/2021 |
| 2214234-202206-M1 | MSPO Part 4: 4.5.1.1 Major | 22/06/2022 | Closed on 19/09/2022 |
| 2214234-202206-M2 | MSPO Part 4: 4.6.1.1 Major | 22/06/2022 | Closed on 19/09/2022 |
| 2214234-202206-M3 | MSPO Part 3: 4.4.4.2 (d) Major | 22/06/2022 | Closed on 19/09/2022 |
| 2214234-202206-N1 | MSPO Part 3: 4.4.5.11 Minor | 22/06/2022 | Open |
| 2214234-202206-N2 | MSPO Part 4: 4.4.5.11 Minor | 22/06/2022 | Open |

3.5 Issues Raised by Stakeholders



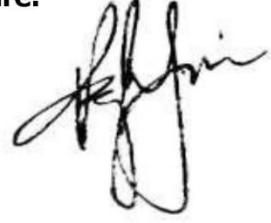
| IS # | Description |
|-----------------|---|
| <p>1</p> | <p>Issues: <u>Local villagers (Kg Limau-Limau) representatives</u> The villagers have a very good relationship with the company and has been transparent to the villagers. There have been no undissolved issues so far. The company has also always invited the village representative to attend meetings as a channel to discuss any social issues. They were also made to understand the mechanism to lodge complaint or grievance should there be any. In term of contribution, the company has allowed them to use the estate internal roads and regularly provide clean water to the village. There are also several villagers who are working for the company.</p> <p>Management Responses: No further issue.</p> <p>Audit Team Findings: No further issue.</p> |
| <p>2</p> | <p>Issues: <u>Smallholders (FFB suppliers)</u> Pricing of FFB has been made transparently and documented in an agreement. The company has also regularly invited to attend stakeholder meeting as a channel to discuss any issues. They were also made to understand the mechanism to lodge complaint or grievance should there be any. So far, the smallholders are satisfied with the business relationship with the company.</p> <p>Management Responses: No further issue.</p> <p>Audit Team Findings: No further issue.</p> |
| <p>3</p> | <p>Issues: <u>Headmaster of SK Jambongan</u> Relationship with the company has been good so far. The company has also regularly invited to attend stakeholder meeting as a channel to discuss any issues. The school was also made to understand the mechanism to lodge complaint or grievance should there be any. Nonetheless, there has been no issue so far. In term of social contribution, the company has been generous. Among the contribution made were monetary donation for school activities, maintenance and repair some of the school facilities, transport provision for school children, to name a few.</p> <p>Management Responses: No further issue.</p> <p>Audit Team Findings: No further issue.</p> |
| <p>4</p> | <p>Issues: <u>Gender committee representative</u> The objective of the committee is to create awareness and understanding on sexual harassment and domestic violence. The committee is required to plan annual activities to achieve the objective. Among the important activity planned were briefing/training to female workers/employees on understanding the</p> |

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| | <p>meaning of sexual harassment and domestic violence and method of reporting should it happen. So far, there has been no report on sexual harassment or violence at the workplace. The management has also been very supportive with the programmes in term of financial, facilities and other resources.</p> <p>Management Responses: No further issue.</p> <p>Audit Team Findings: No further issue.</p> |
| 5 | <p>Issues: <u>Field workers</u></p> <p>The management has given a good treatment to the workers in term of welfare. Safety at the workplace is a top priority imposed by the management. Adequate trainings and free PPE were among the main needs given by the management. With regards to welfare, housing facilities, water & electricity supply were always maintained in good conditions. Workers were also made to understand the mechanism to lodge complaint or grievance should there be any. There has been no issue with payment and wages, including the timing of payment so far.</p> <p>Management Responses: No further issue.</p> <p>Audit Team Findings: No further issue.</p> |

3.6 List of Stakeholders Contacted

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| <p>Government Officer: Headmaster of SK Jambangan</p> | <p>Community/neighbouring village: Local villagers (Kg Limau-Limau) representatives</p> |
| <p>Suppliers/Contractors/Vendors: Smallholders (FFB suppliers)</p> | <p>Worker’s Representative/Gender Committee: Gender committee representative Mill operators Field workers</p> |

Section 4: Assessment Conclusion and Recommendation

| Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings | | |
|--|---|---|
| Based on the findings during the assessment Genting Jambongan Oil Mill (GJOM) and Genting Jambongan Estate (GJBE) Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Genting Jambongan Oil Mill (GJOM) and Genting Jambongan Estate (GJBE) Certification Unit is approved and/or continued. | | |
| Acknowledgement of Assessment Findings | Acknowledgement of Assessment Findings | Report Prepared by |
| Name: Arunan Kandasamy | Name: James Chung Khim Hon | Name: Hafriazhar Mohd. Mokhtar |
| Company name: Genting Plantations Berhad | Company name: Genting Plantations Berhad | Company name: BSI Services Malaysia Sdn. Bhd. |
| Title: Senior Vice President - Plantation | Title: Senior Vice President – Group Processing | Title: Lead Auditor |
| Signature:  Date: 3/10/2022 | Signature:  Date: 3/10/2022 | Signature:  Date: 19/09/2022 |

Appendix A: Summary of the findings by Principles and Criteria

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

| Criterion / Indicator | | Assessment Findings | Compliance |
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| 4.1 Principle 1: Management commitment & responsibility | | | |
| Criterion 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 - | Genting Oil Mills (Sabah) Sdn Bhd has developed Malaysian Sustainable Palm Oil (MSPO) Policy, version dated 18/03/2014 signed by President & Chief Operating Officer, Mr. Yong Chee Kong. The company ensure compliance with MSPO and the MPOB Code of Practice requirements. Briefing of the policy was conducted on 25/03/2022 to the workers during morning muster. Seen the training attendance list. | Complied |
| 4.1.1.2 | The policy shall also emphasize commitment to continual improvement. - Major compliance - | In the policy above, the company also committed to continue to assess and develop new and innovative techniques, approaches, and practices with the objective of continuous improvement in the journey towards achieving sustainable palm oil. | 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. - Major compliance - | Internal audit plan was established to carry internal audit for MSPO Part 3 and RSPO P&C in the estate. Refer RSPO & MSPO Internal Audit Report dated 17/06/2022. Internal Audit has been conducted on 07-08/06/2022 from the Sustainability units. Seen the RSPO & MSPO Internal Audit Report where total 8 observations were raised. Action plan, person-in-charge, timeline and status of the observation was developed and updated. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| 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 - | Genting Oil Mills (Sabah) Sdn Bhd has developed Sustainability Internal Audit procedure with Doc. No.: SMP-GPB-03, Rev. 06 dated 09/07/2021 to plan and implement internal audits to determine conformance to the applicable sustainability standards' requirements such as RSPO, MSPO and ISCC. The frequency of the audit is not less than once a year. Refer RSPO & MSPO Internal Audit Report dated 17/06/2022. Internal Audit has been conducted on 07-08/06/2022 from the Sustainability units. Seen the RSPO & MSPO Internal Audit Report where total 8 observations were raised. Action plan, person-in-charge, timeline and status of the observation was developed and updated. No non-conformity was raised during the audit. | Complied |
| 4.1.2.3 | Report shall be made available to the management for their review. - Major compliance - | Refer RSPO & MSPO Internal Audit Report dated 17/06/2022. Internal Audit has been conducted on 07-08/06/2022 from the Sustainability units. The report was available to the management for review. | Complied |
| Criterion 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 - | RSPO & MSPO Management Review meeting was conducted on 17/06/2022 for both Genting Jambongan Oil Mill (GJOM) and Genting Jambongan Estate (GJBE). The meeting was chaired by Mill Manager and attended by relevant personnel from both mill and estate. Meeting minutes was available. Among agenda in the meeting were: <ol style="list-style-type: none"> 1. Status of the outstanding issues from previous meetings 2. Changes, improvement, or modification of the sustainability management system 3. Internal and external audit findings on Sustainability Management System 4. Complaint and grievances book | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | 5. Enquiry Register Book 6. Stakeholder Meeting reports / Minutes 7. Green House Value (ISCC, MSPO & RSPO) 8. Review Continual Improvement Status and its recommendation Review on Resource & Training Requirement 9. Review on Resources & Training requirement 10. Review of sustainability Policy and its objective status 11. Review of effectiveness in achieving quality, environmental, social, safety and health objectives 12. Compliance status on legal and other requirement 13. Any other matters 14. Preventive and corrective action 15. Recommendation for improvement 16. Customer feedback 17. Follow up actions from management review 18. Changes that could affect the management system 19. Management review meeting conclusion | |
| Criterion 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 action plan for continual improvement with regards to social and environment impacts, and opportunities were available in the estate in various forms such as social action plan, environmental management plan, and water management plan to name a few. The plans have the information about the RSPO/MSPO Requirement, | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | <p>Objective/Description, Action Plan, Monitoring/Verification/Target, PIC Target/Timeline, Results/Remarks/Status.</p> <p>Among the action plan were:</p> <ol style="list-style-type: none"> 1. Use of alternative pesticides that are safe and less toxic i.e. Basta and Glyphosate – Monix used as at immature areas instead of Paraquat 2. Regular monitoring of water quality – to take water analysis when poor water quality observed 3. Maximizing recycling and minimizing waste or by products generation – continue create awareness on recycling programme through campaign, posters etc. 4. Improve condition of tractors i.e. leaking to prevent pollution and improve safety as well as productivity – Carry out necessary repairs stage by stage. 5. To improve interior and exterior of workers quarters – Carry out interior and exterior painting for workers quarters 6. Improve record of workers i.e photo, work agreement etc. – To monitor full availability of worker’s document. | |
| 4.1.4.2 | <p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p>- Major compliance -</p> | <p>The estate continuously ensures there are improvement practices in line with new information and techniques introduced in the workforce. Since the last assessment, there was no opportunity for the estate to adopt new technology in its operation.</p> | Complied |
| 4.1.4.3 | <p>An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established.</p> | <p>The new information and techniques to improve practices are obtained mainly through information from suppliers and being members of associations related to palm oil industry (e.g. ISP).</p> | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| - Major compliance - | | | |
| 4.2 Principle 2: Transparency | | | |
| Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements | | | |
| 4.2.1.1 | <p>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.</p> <p>- Major compliance -</p> | <p>Genting Oil Mills (Sabah) Sdn Bhd has developed Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 23/02/2018 for the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties. Meeting shall be carried out at least six monthly and annually for internal and external stakeholders. The topics to be discussed such as complaint & grievances, environmental and biodiversity concerns, social issue, and suggestions for improvement. The procedure has been briefed to the internal and external stakeholders. Briefing to the external stakeholders was conducted during the stakeholder meeting conducted on 14/05/2022. Issues raised and actions taken during the stakeholders meeting were well recorded in a management plan and made available for verification.</p> | Complied |
| 4.2.1.2 | <p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p> | <p>Genting Oil Mills (Sabah) Sdn Bhd has developed Procedures on Requests and Responses with Doc. No.: SMP-GPB-25, Rev. 0 dated 14/08/2014 to define the responsibilities to respond constructively and promptly to the information requested by stakeholders. Based on the procedure, the list of documents which are publicly available as follows:</p> <ul style="list-style-type: none"> • Company annual report • Group policies | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | <ul style="list-style-type: none"> • Reports related to environment such as EIA, EAI • RSPO external audit reports • Pollution prevention plan • Continuous improvement plan • Complaints and grievances book and its procedure • Negotiation and compensation procedure • Sexual harassment procedure <p>GJBE has issued the list of documents that could be requested by the stakeholders to all the relevant stakeholders of the mill. The stakeholders are required to register in Enquiry Register Book prior to access to the documents. The list of documents not limited to:</p> <ul style="list-style-type: none"> • Land title • Policies • Reports – EAI, SIA, HCV and audit reports • Management plans • Procedures <p>The stakeholders were briefed on the request and response during the stakeholder meeting conducted on 14/05/2022.</p> | |
| Criterion 4.2.2 – Transparent method of communication and consultation | | | |
| 4.2.2.1 | <p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance –</p> | <p>Genting Oil Mills (Sabah) Sdn Bhd has developed Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 23/02/2018 for the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties. Meeting shall be carried out at least six monthly and</p> | Complied |

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| | | annually for internal and external stakeholders. The topics to be discussed such as complaint & grievances, environmental and biodiversity concerns, social issue and suggestions for improvement. | |
| 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 - | Manager of the estate has been appointed by Senior Manager Operations to be the representative for ISCC, RSPO and MSP0 related matters. Appointment letter dated 17/09/2019 was made available for verification. | 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. - Major compliance - | Stakeholder list for GJBE was made available for verification. The stakeholders such as contractors, suppliers, local communities and government authorities were included into the list. A combined stakeholder meeting was conducted on 14/05/2022 in GJBE. Stakeholders such as local communities, local authorities, contractors and suppliers were invited and attended the meeting. Seen the meeting minutes and requests from the stakeholders were recorded in the minutes. | Complied |
| Criterion 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). - Major compliance - | Genting Oil Mills (Sabah) Sdn Bhd has developed the traceability procedure with Doc. No.: SMP-GPB-09, Rev. 06 dated 11/10/2021. The SOP was to ensure the handling of outgoing FFB are carried out in the proper manner to ensure traceability and to meet the sustainability requirements. | Complied |
| 4.2.3.2 | The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance - | Inspection on compliance with the traceability procedure is regularly checked through supply chain internal audit. The internal audit report, which was written together with other schemes audit such as RSPO and ISCC, was available for verification (see Criterion 4.1.2 for details). | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | |
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| 4.2.3.3 | The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance - | Genting Oil Mills (Sabah) Sdn Bhd has defined the roles and responsibilities for the implementation and maintenance of its traceability system in the Traceability (Estate) procedure. Refer Appointment letter as Person in Charge for Traceability Requirement of RSPO, ISCC and MSPO Sustainability Standards to Pn Rostinah Binti Madilan dated 02/01/2020. | Complied | | | | | | | | | | | | | | | | |
| 4.2.3.4 | Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance - | FFB and palm kernel are maintained in various forms such as, Estate's FFB dispatch advice and Weighbridge ticket Based on the estate's crop production records. Sample of ticket as below: <table border="1" data-bbox="1048 754 1870 890"> <tr> <td>Date</td> <td>27/01/2022</td> <td>29/03/2022</td> <td>27/05/2022</td> </tr> <tr> <td>Ticket No</td> <td>FFB22000625W</td> <td>FFB22001827W</td> <td>FFB22002918W</td> </tr> <tr> <td>Lorry No.</td> <td>LD20</td> <td>LD20</td> <td>YANMAR05</td> </tr> <tr> <td>Weight, MT</td> <td>5.58</td> <td>6.44</td> <td>1.73</td> </tr> </table> | Date | 27/01/2022 | 29/03/2022 | 27/05/2022 | Ticket No | FFB22000625W | FFB22001827W | FFB22002918W | Lorry No. | LD20 | LD20 | YANMAR05 | Weight, MT | 5.58 | 6.44 | 1.73 | Complied |
| Date | 27/01/2022 | 29/03/2022 | 27/05/2022 | | | | | | | | | | | | | | | | |
| Ticket No | FFB22000625W | FFB22001827W | FFB22002918W | | | | | | | | | | | | | | | | |
| Lorry No. | LD20 | LD20 | YANMAR05 | | | | | | | | | | | | | | | | |
| Weight, MT | 5.58 | 6.44 | 1.73 | | | | | | | | | | | | | | | | |
| 4.3 Principle 3: Compliance to legal requirements | | | | | | | | | | | | | | | | | | | |
| Criterion 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 - | GJBE monitored compliance with applicable local, state, national and ratified international laws and regulations through evaluation of compliance. Among the evidence of legal compliance verified were as follows: <ol style="list-style-type: none"> MPOB License no. 509406502000, valid until 30/11/2022 Private Installation license, no.: a. 2021/01500 (Genset Div.1) valid until 07/07/2022 b. 2021/01501 (Genset Jetty) valid until 25/07/2022 c. 2021/01495 (Genset Tabanna) valid until 25/07/2022 | Complied | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | 3. Certificate of fitness (CF) no. for air receiver: a. SB PMT 13039 valid until 31/05/2023 b. SB PMT 15087 valid until 31/05/2023 4. Diesel permit no. S003513 valid until 08/06/2024 5. Petrol permit no. S003190 valid until 11/07/2022 6. Speed Boat (Cruiser 02) No: BN-A 1596/7/P valid until 22/07/2022 7. Speed Boat (Cruiser 01) No: BN-A 1911/P valid until 30/12/2022 Permit for "Mendarat/Memuat Barang-Barang Di Tempat Selain Daripada Tempat Pendaratan Sah" No: KE.SB (05)381/02-237(07) valid until 31/12/2021 (In progress of renewal). Refer letter JPD.SKN.900-2/2/2 Jld.2(52) dated 06/12/2021. | |
| 4.3.1.2 | The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance - | All related legal requirements had been documented in "Master List of Legal Requirements & Best Practices Applicable to Plantation Operations in Malaysia". Refer latest email from headquarters dated 14/05/2022 stated on updating of Minimum Wages Order 2022 and Windfall Profit Levy (Oil Palm Fruit) (Amendment) Order 2021. | 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 process of law changes Addressed in Legal Requirement Register, Doc no. SMP-GPB-22 rev. 09 dated 08/09/2020. Notification of changes from various source of information i.e. Lawnet, government gazette and sustainability team based in the Sandakan HQ. <ol style="list-style-type: none"> 1. Monitoring for changes in the Law 2. Clarification and review on the changes 3. Updating of the Legal register administered internally 4. Notification to the operating units and/or the relevant person in charge The established legal register has incorporated the latest changes of law. Refer latest email from headquarters dated 14/05/2022 stated on | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | updating of Minimum Wages Order 2022 and Windfall Profit Levy (Oil Palm Fruit) (Amendment) Order 2021. | |
| 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 - | Genting Oil Mills (Sabah) Sdn Bhd has defined the roles and responsibilities for monitoring compliance and updating changes in law procedure. Refer Appointment letter as Person in Charge for Updating Changes in Laws at GJBE to Roseyati Onwin dated 03/05/2021. | Complied |
| Criterion 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 - | The was no evidence to show that oil palm cultivation activities GJBE had diminished the land use rights of others. Verified documents to show legal ownership of its land by Genting Oil Mills (Sabah) Sdn Bhd. | Complied |
| 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 - | The estate has 597 land titles, and they were summarised in a list which has the information about title no., area size (in Ac and Ha), lease period, and term of use. Copies of the titles were made available for verification. Based on the land titles, the total area is 4,602.30 Ha. | Complied |
| 4.3.2.3 | Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance - | Legal perimeter boundary markers sighted clearly demarcated and visibly maintained on the sample field Block 15; Coordinate: 6° 38" 23.676' N; 117° 26" 1.6548' E at a boundary to smallholder. All boundaries are marked in the documented boundary stone map # 174N/496E. | Complied |
| 4.3.2.4 | Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance - | There is no land dispute in the GJBE at the time of audit. This has been verified through interview with the local community. The land belongs to Genting Oil Mills (Sabah) Sdn Bhd and land ownership documents were verified. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| Criterion 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. - Major compliance - | There is no customary land or negotiated agreements within the GJBE's land area. | N/A |
| 4.3.3.2 | Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. - Minor compliance - | The right to use the land is not disputed and there was no customary land within the GJBE. | N/A |
| 4.3.3.3 | Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance - | There is no land dispute or customary rights issues in the estate. | N/A |
| 4.4 Principle 4: Social responsibility, health, safety and employment condition | | | |
| Criterion 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. - Minor compliance - | Social Impact Assessment (SIA) & Human Rights Impact Assessment (HRIM) Report was reviewed in April 2021 for both GJOM and GJBE by Sustainability Department. The assessment has involved relevant stakeholders such as schools' representatives, local authorities, and workers. No negative impact was identified during the assessment through interviewed. Social Management and Monitoring Plan of GJBE was reviewed and last updated on 09/06/2022. The next SIA is planned to be conducted in August 2022 where the forced labour element will be included. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| Criterion 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 - | Genting Oil Mills (Sabah) Sdn Bhd has established Complaints and Grievances procedure with Doc. No.: SMP-GPB-19, Rev. 04 dated March 2020 to provide guidelines on handling complaints & grievances involved internal and external stakeholders. All the written confidential complaints shall be dealt by Manager. The timeframe for the action to be taken depends on seriousness of the complaints or grievance. The accepted timeframe to acknowledge and respond to the complaint or grievances is within 1 month upon receipt. | 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 estate has implemented Complaints/ Grievances Record Book to record any complaint or grievance received. Most of the complaints were of road conditions by the local communities and maintenance of housing facilities. Based on verification of the complaints/grievance records, all the issues were resolved in appropriate manner. | 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 Complaints/Grievances Record Book serves as complaint forms and made available in the office. Apart from that, complaints can also be lodged through a complaint box which was available at the labour quarters and security post. Interview with the workers and stakeholders confirmed that they are aware of both mechanisms. | 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 - | Briefing to the external communities was conducted on 14/05/2022 during the stakeholder meeting. Interviewed with the external stakeholders confirmed that they are aware of the complaint procedure. | Complied |
| 4.4.2.5 | Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. | Records of complaint or grievance for June 2020 were available for review during the audit. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| - Major compliance - | | | |
| Criterion 4.4.3: Commitment to contribute to local sustainable development | | | |
| 4.4.3.1 | <p>Growers should contribute to local development in consultation with the local communities.</p> <p>- Minor compliance -</p> | <p>Genting Jambongan Estate is situated in an island and surrounded by several villages. The company and the local community, including schools, have established good relationship between them ever since the setup of the estate in the island. Among the contributions provided by the company are road maintenance, distribution of clean water to local communities, and monetary donations to the schools. The existence of the company has also provided a good job opportunity to the locals and many of them are currently working for the company.</p> | Complied |
| Criterion 4.4.4: Employees safety and health | | | |
| 4.4.4.1 | <p>An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p> | <p>The Occupational Safety and Health Policy had been established, signed by President & Chief Operating Officer on 01/07/2018. The policy was communicated to the employees through various methods such as training, morning muster, and display on notice boards. Policy training was conducted on 23/05/2022.</p> | Complied |
| 4.4.4.2 | <p>The occupational safety and health plan shall cover the following:</p> <p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risks of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> | <p>a) The Occupational Safety and Health Policy had been established, signed by President & Chief Operating Officer on 01/07/2018. The policy was communicated to the employees through various methods such as training, morning muster, and display on notice boards.</p> <p>b) SOP for HIRARC (SP-MGR-01) was made available. The technique was described accordingly in the SOP. The HIRARC was reviewed on 25/01/2019. Reviewing the HIRARC were in progress. Verified through interviewed with the Safety Officer.</p> | Major Non-Conformity |

| Criterion / Indicator | Assessment Findings | Compliance |
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| <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied 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). 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. 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. | <p>Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The CHRA reports JKPP HQ/03/ASS/00/154-2021/034 dated February 2021 was available for verification.</p> <p>Medical Surveillance was not required as per assessor recommendation in the section 6.5 Necessity for medical Surveillance Program however, estate was conducted monthly check up and monitoring for their sprayer and manurer. Refer latest (Summary Checkup Spray/Manuring for May) report dated 20/05/2022</p> <p>Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019. Refer report dated 24/06/2021 with reference number CC/0621/061.</p> <p>Audiometric Test was conducted in the estate as per the recommendation in the Noise Risk Assessment. Refer Report dated 25/01/2022 by DAB OH Sdn Bhd. 28 workers were examined with 24 workers having normal hearing, 4 workers with abnormal hearing and no workers fall under Standard Threshold Shift. Annual Audiogram Examination by OHD has been plan for 4 workers on 25/06/2022 as per letter with reference number DG/CL/062022-177-DR dated 15/06/2022.</p> <p>c) Training matrix and training programme were established by the management. Evidence of adequate and appropriate training on safe working practices provided to workers was sighted, for</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
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| <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p> | <p>example: SW Training dated 17/06/2022, HIRARC Training dated 14/06/2022 and Spraying Training on 11/06/2022.</p> <p>d) Issuance of PPE to employees is recorded in a standard form which has the information about name of employee, type of PPE, workstation, date of issuance and acknowledgment of receipt. PPE required has for operation were based on SOP, HIRARC and SDS.</p> <p>Major NC</p> <p>HIRARC risk control was not accordance to Standard Operating Procedure and PPE usage at manuring area was not effectively implemented.</p> <p>Document verification found that HIRARC for Workshop dated 08/02/2018 – Cutting and Bending Machine stated on Risk Control – SOP, Training and PPE (Goggle, Nitrile Glove, Wellington Boots, Approved Respirator and Apron) however it was not in line SOP Revision 3 dated 11/10/2013, "Langkah-Langkah Perlu Di Patuhi Di Bengkel" section 2.0 PPE - ":Leather Gloves, Safety Boots"</p> <p>During site visit at Block 45, Manuring application were conducted by 13 female workers. Fertilizer type was Mixture NK Mix. Based on site verification found PPE used were Nitrile Gloves, Apron, and Shoes however none of them were wear chemical goggles for eye protection as required by Safety Data Sheet Mixture NK 10.5-30 section 8.2, SOP Revision 3 dated 11/10/2013 section 2.0 (Langkah-Langkah Penaburan Baja – PPE) and HIRARC Manual Fertilizer Application dated 08/02/2018.</p> <p>e) SOP for handling chemical management was addressed in a few procedures such as SOP for spraying and Highly Toxic Pesticides procedure. The procedure outlines the handling of chemicals in accordance to the regulation. Refer SOP and Justification of</p> | |

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| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|--|------------|
| | <p>Pesticides Used Doc No: SMP-GPB-28 Rev 06 dated 18/03/2021. SDS were placed at the Chemical and Fertilizer Store. Chemical Register has been prepared on 24/05/2022.</p> <p>f) SHC Organization – Chairman: Estate Manager, SHC secretary: Assistant Manager. Organization chart of OSH committee was available</p> <p>g) Records were available confirming that quarterly OSH meetings had been held at the Genting GJBE meeting room. Latest 4 meeting was verified as per Ref.: OHS meeting minutes (GJBE) – 12/05/2022, 11/02/2022, 11/11/2021 and 11/08/2021.</p> <p>h) The handling of accident and emergency are addressed in “Pemberitahuan dan Penyiasatan Kemalangan di Tempat Kerja” procedure. Fire Fighting and ERP Training has been conducted on 11/06/2022.</p> <p>i) First Aid Kit were available at each workstation visited. Sample checked at Harvesting Operation, Spraying Operation and Chemical Store. Contents of the first aid box were checked and found in order. Monitoring of First Aid box has been conducted by HA on monthly basis. Latest inspection conducted on 25/05/2022. Training has been conducted on 12/06/2022 at Creche Ayah Div 03.</p> <p>All accidents are to be investigated and reported to Head Office. It also has been discussed in the OSH Quarterly Meeting. Refer Minutes of meeting dated 11/11/2021 section 3.0 Accident Report. JKPP 8 report has been submitted on 13/01/2022 with reference number JKPP8/99819/2022. There are 3 accidents recorded with involved of 75 lost days. JKPP 6 report has been submitted with sample record on 21/10/2021, 15/10/2021 and 28/05/2021. Accident investigation has</p> | |

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| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | been conducted for cases reported. Refer Laporan Siasatan Kemalangan JKKP dated 22/05/2021 consist of Investigation committee, Photo evidence and description of the accident. The management has taken necessary action in term of reporting to the authority and compensation claim. | |
| 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 policy shall be signed by the top management and effectively communicated to the employees. - Major compliance - | Genting Oil Mills (Sabah) Sdn Bhd has established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company respect human rights and support international human rights law. Briefing of the policy was conducted on 21/05/2022 to the workers during morning muster. Seen the training attendance list. | Complied |
| 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 - | Genting Oil Mills (Sabah) Sdn Bhd has established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company shall not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation. | 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 - | There were employment contracts for staffs and workers. Pay and conditions are documented and achieved the Minimum Wage Order 2020. Sampled of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Sabah Ordinance which have been signed by the worker. Sampled of total 8 payslips for Oct 2021, Feb 2022 and May 2022. found that all the workers were paid accordingly. | Complied |
| 4.4.5.4 | Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the | The management has ensured the employees of the contractors were paid based on legal and employment agreement through obtaining the | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| | employment contract agreed between the contractor and his employee. - Minor compliance - | pay slips of the employees on monthly basis. Among the elements checked by the management are wages, EPF and SOCSO. Through verification of the sampled workers' pay slips (Oct 2021, Feb 2022, and May 2022) of the sampled contractors (Yee Kiun and Syarikat CM), the wages paid were in line with the legal minimum wage. The EPF and SOCSO were also correctly contributed according to the legal requirements. | |
| 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. - Major compliance - | The estate has key in the personal biodata into Lintramax Plantation Director system to record of full name, employee no., date joined, gender, date of birth and type of work were clearly stated in the list. | Complied |
| 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 is available for each and every employee indicated in the employment records. - Major compliance - | All the workers are employed under direct employment. 2 employment contracts were sampled and found that terms and conditions of the employment were clearly stated in the contract and signed by the workers. | Complied |
| 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 - | The estate management monitor the attendance and working time through checkroll book. Overtimes will be recorded in Overtime Form which is transparent to workers and the number of overtimes will be shown in the payslips. | 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 and collective agreements. Overtime shall be mutually agreed | Interview with the workers confirmed that they have rest time in between of the working hours. Overtimes were paid according to the rate stated in the agreement and regulatory requirements. The | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance - | overtime offered upon mutually agreement. Overtimes will be recorded in Overtime Form. | |
| 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 - | Wages and overtime were paid according to Sabah Ordinance and Overtime Form of the workers. Total hours of overtime and daily attendance has recorded in the Lintramix system and the payslips. Refer to indicator 4.4.5.3. | Complied |
| 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. - Minor compliance - | All the workers are provided with free medical facilities. Free housing facilities were provided to all the workers and their families. Free transport to send the children of the workers to school. Place of worship was available for all the workers and their family members. | 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 in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. - Major compliance - | The estate management has provided free housing facilities to all the workers. Basic amenities such as water and electricity were provided to the workers. Linesite inspection was carried out on weekly basis by the Estate Hospital Assistant. Based on verification of the inspection records, any issues identified were recorded and appropriate actions were taken accordingly. However, the treated water analysis for the labour quarters at Block 4, Jambongan Estate was only carried out twice in 2021 [report ref.: #W210225/10 (dated 25/02/2021) and #W211111/01B (dated 11/11/2021)]. This is not in compliance with Clause 4.3 of the GPB's SMPM Water Sampling and Analysis (doc. no.: SMP-GPB-15, rev. 01, dated 12/11/2014) which requires the analysis to be carried out on a quarterly basis. | Minor Non-Compliance |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | This indicated that the frequency of analysis of the treated water was not carried out according to the procedure. Hence, a Minor NC has been raised. | |
| 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 - | <p>Genting Oil Mills (Sabah) Sdn Bhd has established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited. Reproductive rights are protected. Briefing of the policy was conducted on 24/09/2020 to the workers during morning muster. Seen the training attendance list.</p> <p>Procedure on Prevention and Eradication of Sexual Harassment at the Workplace was established with Doc. No.: SMP-GPB-20, Rev. 0 dated 11/10/2013. Process of handling sexual harassment complaint was outlined in the procedure.</p> <p>Gender Committee was established in the estate and seen the last meeting was conducted on 29/01/2022. There was no case of sexual harassment and violence reported.</p> | 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 | There is no trade union in any of the visited estates. Nonetheless, there is also no restriction for them to join any trade union. This is recognized by the employer through establishment of people Policy dated 03/08/2009. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | |
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| | discriminated against or suffer repercussions. - 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. - Major compliance - | Based on the records in the employee’s data base system, which has the information about date of birth and date join, there was no children and young person being employed. | Complied | | | | | | | | | | | | | | | | | | | | | | |
| 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 - | <p>Training matrix and training programme had been established by the management and documented in the Training Needs, Analysis and Plan for Year 2022. Among the trainings given by the estate are generally covering the aspects of OSH, environment, and best practices. E.g. of training records verified are as follows:</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>SW Training</td> <td>17/06/2022</td> </tr> <tr> <td>SOP, HIRARC and PPE</td> <td>14/06/2022</td> </tr> <tr> <td>SOP and Store Management</td> <td>14/06/2022</td> </tr> <tr> <td>First Aid Training</td> <td>12/06/2022</td> </tr> <tr> <td>Fertilizer Application Training</td> <td>11/06/2022</td> </tr> <tr> <td>Spraying, Calibration and Triple Rinsing</td> <td>11/06/2022</td> </tr> <tr> <td>Spraying technique at Buffer Zone</td> <td>11/06/2022</td> </tr> <tr> <td>Fire Fighting and ERP</td> <td>11/06/2022</td> </tr> <tr> <td>Re Entry Training for Harvesting</td> <td>11/06/2022</td> </tr> <tr> <td>NRA and Hearing Conservation Program</td> <td>10/06/2022</td> </tr> </tbody> </table> | Training | Date | SW Training | 17/06/2022 | SOP, HIRARC and PPE | 14/06/2022 | SOP and Store Management | 14/06/2022 | First Aid Training | 12/06/2022 | Fertilizer Application Training | 11/06/2022 | Spraying, Calibration and Triple Rinsing | 11/06/2022 | Spraying technique at Buffer Zone | 11/06/2022 | Fire Fighting and ERP | 11/06/2022 | Re Entry Training for Harvesting | 11/06/2022 | NRA and Hearing Conservation Program | 10/06/2022 | Complied |
| Training | Date | | | | | | | | | | | | | | | | | | | | | | | | |
| SW Training | 17/06/2022 | | | | | | | | | | | | | | | | | | | | | | | | |
| SOP, HIRARC and PPE | 14/06/2022 | | | | | | | | | | | | | | | | | | | | | | | | |
| SOP and Store Management | 14/06/2022 | | | | | | | | | | | | | | | | | | | | | | | | |
| First Aid Training | 12/06/2022 | | | | | | | | | | | | | | | | | | | | | | | | |
| Fertilizer Application Training | 11/06/2022 | | | | | | | | | | | | | | | | | | | | | | | | |
| Spraying, Calibration and Triple Rinsing | 11/06/2022 | | | | | | | | | | | | | | | | | | | | | | | | |
| Spraying technique at Buffer Zone | 11/06/2022 | | | | | | | | | | | | | | | | | | | | | | | | |
| Fire Fighting and ERP | 11/06/2022 | | | | | | | | | | | | | | | | | | | | | | | | |
| Re Entry Training for Harvesting | 11/06/2022 | | | | | | | | | | | | | | | | | | | | | | | | |
| NRA and Hearing Conservation Program | 10/06/2022 | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | Compliance |
|---|--|---|------------|------------|
| | | Harvesting and PPE | 09/06/2022 | |
| 4.4.6.2 | <p>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.</p> <p>- Major compliance -</p> | <p>The estates have conducted training need analysis for all employees, management and contractors. The training need analysis was conducted based on the job designation and training required by the job type. Sighted the Estate: Recommended Training Needs for the year 2022 for all estates.</p> | | Complied |
| 4.4.6.3 | <p>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.</p> <p>- Minor compliance -</p> | <p>A training programme has been developed and available in the Annual Sustainability Programme 2022. The trainings were sighted to have been sub categorised to trainings on Environmental, GAP, SOP, Social and OSH.</p> | | Complied |
| 4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services | | | | |
| Criterion 4.5.1: Environmental Management Plan | | | | |
| 4.5.1.1 | <p>An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.</p> <p>- Major compliance -</p> | <p>Environmental Policy had been established, signed by the Chief Operating Officer on 05/10/2009. The policy published publicly via company's website link as following: https://www.gentingplantations.com/wp-content/uploads/2022/05/GENP-Environmental-Policy.pdf In GJBE, the policy was communicated to the employees through various methods such as training, morning muster, and display on notice boards to name a few. Latest policy briefing among workers was conducted during morning muster roll-call dated on 25/3/2022 and briefing to the external stakeholders was conducted during the stakeholder meeting on 14/05/2022.</p> | | Complied |

| Criterion / Indicator | Assessment Findings | Compliance |
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| <p>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 -</p> | <p>Based on the Environmental Policy established, Genting Oil Mills (Sabah) Sdn Bhd has spelt out objectives as following:</p> <ul style="list-style-type: none"> • Comply with all applicable laws and other regulations pertaining to the Environment • Adopt suitable pollution prevention measures that will enhance the current practices towards sustainable development • Set realistic goals and monitor progress to ensure continual improvement in environmental performance • Ensure that company’s stakeholders are aware of and share our commitment to responsible environmental stewardship. <p>The aspect and impact analysis of GJGE operations was latest reviewed in January 2022. In the comprehensive report, the analysis spelt out the target as following:</p> <ul style="list-style-type: none"> • Plan to avoid negative impact and to promote positive impacts • Reduction disposal of waste taking into consideration of social responsibilities • Plan to reduce pollution and release of GHG • Development and implementations <p>The aspect and impact covered the following GJBE activities/operations among others as following:</p> <ul style="list-style-type: none"> • Poisoning VOPs/ woodies • Circle spraying • Empty containers management | <p>Complied</p> |

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|-----------------------|---|---|------------|
| | | <ul style="list-style-type: none"> • Rat baiting • Diesel Reception • Triple rinsing • Vehicle maintenance • EFB application • Fertilizer storage /application • Grass slashing • Chemicals storage • Grading of FFB <p>The management plan includes the environmental performance monitoring of air emission, water discharge from estate operations, line-site and landfill area, soil erosion and greenhouse gas emissions. Identified control or mitigation measures were established to mitigate the identified environmental aspects and its impacts. For example, construction of terrace, planting of cover crop, establishment of riparian buffer zone, adhere the zero-burning policy, proper landfill site.</p> | |
| 4.5.1.3 | <p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p> | <p>GJBE developed an environmental management and monitoring plans which were implemented, reviewed and updated in a participatory through consultation with stakeholders and assistance by Sustainability Department personnel. Among established Environmental Continual Improvement Plan are as following:</p> <ul style="list-style-type: none"> • HCV area checklist to records the monitoring conducted at the HCV areas • Monitoring of the river water quality on six monthly bases • Monitoring of the water usage for estate operation on monthly basis | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | |
|--|--|--|------------|------|-------------------------------------|------------|--------------------------|------------|---------------------------------|------------|--|------------|--|------------|----------|
| 4.5.1.4 | <p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p> | <p>Based on the established Environmental Continual Improvement Plan, actions and monitoring are taken as per sample as following:</p> <ul style="list-style-type: none"> HCV inventory program with monitoring of area condition and biodiversity presence through regular patrolling River water quality monitoring latest analysis of sample by Dynakey Laboratories Sdn. Bhd.; Certificate of Analysis # W211111/01A; Date: 2/12/2021 Water volume for estate operation and domestic records latest at 26,281 litres for period from Jan – May 2022 <p>Water volume monitoring is to ensure the consumption meet targeted <1 lt/mt FFB produced by GJBE. So far, the average achievement as of May 2022 was 0.9 lt/mt FFB produced.</p> | Complied | | | | | | | | | | | | |
| 4.5.1.5 | <p>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.</p> <p>- Major compliance -</p> | <p>Other than environmental policy awareness briefing among workers conducted during morning muster roll-call dated on 25/3/2022 and briefing to the external stakeholders conducted during the stakeholder meeting on 14/05/2022, other environmental awareness and training programs were incorporated in operational trainings developed on annual basis as per latest 2022 programs as per sample as following:</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Scheduled Waste Management Training</td> <td>17/06/2022</td> </tr> <tr> <td>SOP and Store Management</td> <td>14/06/2022</td> </tr> <tr> <td>Fertilizer Application Training</td> <td>11/06/2022</td> </tr> <tr> <td>Spraying, Calibration and Triple Rinsing</td> <td>11/06/2022</td> </tr> <tr> <td>Buffer zone training for sprayer and manurer</td> <td>11/06/2022</td> </tr> </tbody> </table> <p>Based on interview with sample field workers, the environmental awareness among them considered sufficiently instilled by the management.</p> | Training | Date | Scheduled Waste Management Training | 17/06/2022 | SOP and Store Management | 14/06/2022 | Fertilizer Application Training | 11/06/2022 | Spraying, Calibration and Triple Rinsing | 11/06/2022 | Buffer zone training for sprayer and manurer | 11/06/2022 | Complied |
| Training | Date | | | | | | | | | | | | | | |
| Scheduled Waste Management Training | 17/06/2022 | | | | | | | | | | | | | | |
| SOP and Store Management | 14/06/2022 | | | | | | | | | | | | | | |
| Fertilizer Application Training | 11/06/2022 | | | | | | | | | | | | | | |
| Spraying, Calibration and Triple Rinsing | 11/06/2022 | | | | | | | | | | | | | | |
| Buffer zone training for sprayer and manurer | 11/06/2022 | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|--|------------|
| 4.5.1.6 | Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance - | Regular meetings between the management and workers mainly done during daily morning muster roll-call to discuss any issue related to estate operations including environmental issue. Specific environmental issues were discuss during periodical GJBE Sustainability Management Team which was latest conducted on 22/03/2022. | Complied |
| Criterion 4.5.2: 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 an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance - | Optimization of non-renewable energy mainly implemented through efficient operation of machinery and domestic electricity consumption in absence of supply from state authority. Main source of non-renewable energy i.e. diesel was monitored its consumption and compared with FFB production with latest results as following: <ul style="list-style-type: none"> • GJBE 2021 average diesel consumption: 4.59 lt/mt FFB • GJBE 2022 to date (May) diesel consumption: 2.84 lt/mt FFB | Complied |
| 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 estimation of direct usage of non-renewable energy for GJBE operations, including fossil fuel to determine energy efficiency of the machineries and vehicle operations, was available in the estate annual budget. | Complied |
| 4.5.2.3 | The use of renewable energy should be applied where possible. - Minor compliance - | Except for some solar streetlights installed at strategic area by the roadside of main access road to GJBE, no other renewable energy application in GJBE. | Complied |
| Criterion 4.5.3: Waste management and disposal | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|---|------------|
| 4.5.3.1 | All waste products and sources of pollution shall be identified and documented. - Major compliance - | Identification of waste products and sources of pollution is documented in GJBE Waste Management Plan. Identified wastes were categorised to scheduled wastes, domestic wastes and recyclable wastes. The wastes management plan has the information about method of disposal, monitoring & action plan, data required, responsible person and status of implementation. | Complied |
| 4.5.3.2 | A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products - Major compliance - | Based on GJBE Waste Management Plan; Update: 20/4/2022 the management of identified wastes are as following: <ul style="list-style-type: none"> • Scheduled waste Disposal as by DOE approved contractor • Domestic waste: Disposal in designated landfill area • Recyclable waste: Segregation and store at designated area It was observed that due to the locality of GJBE in Genting Jambongan Island which requires boat transfer and barge for bulk transport, the waste mainly recyclable waste are reused such as empty fertilizer bags for loose fruit bags, empty chemical container for premix reuse, used tyres and some plastic bottles for house decorations etc. However, improving the efficiency of resource utilization and recycling of wastes or converting them into value-added by-products for used drum in Genting Jambongan Estate could be improved further. Hence, an OFI has been raised. | OFI |
| 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 - | The SOP established as the procedure for Scheduled Waste Management; SMP-GPB-11, Rev. 02; Dated 11/08/2020. Scheduled Waste (SW) were stored for maximum 180 days in proper SW Store with labelling as per legal requirements. SW were disposed every 6 months through DOE approved SW collector as per sample disposal consignment notes (CN) as following: | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|---|------------|
| | | <ul style="list-style-type: none"> • CN # B016162; Date: 14/5/2022 for SW305 by Lagenda Bumimas • CN # 210201GJBE; Date: 1/2/2022 for SW404 by Sedafiat | |
| 4.5.3.4 | <p>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.</p> <p>- Major compliance -</p> | <p>Due to the locality of GJBE in Genting Jambongan Island which requires boat transfer and barge for bulk transport, empty chemical containers mainly are reused such as for premix containers. In case of the containers are damaged or the quantity are too many, it will be puncture and triple rinsed prior to disposal.</p> | Complied |
| 4.5.3.5 | <p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p> | <p>Due to the locality of GJBE in Genting Jambongan Island which requires boat transfer and barge for bulk transport, domestic waste mainly recyclable waste is reused such as plastic bottles for house decorations etc. Only organic wastes are being disposed through landfill to avoid contamination of the environment and watercourse.</p> | Complied |
| Criterion 4.5.4: Reduction of pollution and emission | | | |
| 4.5.4.1 | <p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p> | <p>All polluting activities were identified through the environmental aspect and impact evaluation register which includes all the estate's activities such as FFB harvesting & evacuation, workshop, field maintenance, nursery, future replanting, line-site, and administration. The register was last reviewed in January 2022.</p> | Complied |
| 4.5.4.2 | <p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p> | <p>The management plan includes the environmental performance monitoring of air emission, water discharge from estate operations, line-site and landfill area, soil erosion and greenhouse gas emissions. Identified control or mitigation measures were established to mitigate the identified environmental aspects and its impacts. For example,</p> | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|------------|
| | | construction of terrace, planting of cover crop, establishment of riparian buffer zone, adhere the zero-burning policy, proper landfill site. | |
| Criterion 4.5.5: Natural water resources | | | |
| 4.5.5.1 | <p>The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> 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. <p>- Major compliance -</p> | <p>GJBE has established the Water Management Plan Genting Jambangan Estate; Date prepared: May 2022; Rev. 09 mainly with objectives to maintain the quality and availability of natural water resources. Based on the plan actions and monitoring are taken as following:</p> <ul style="list-style-type: none"> a. River water as main source for operational with treatment for domestic consumption. Water volume for estate operation and domestic records latest at 26,281 litres for period from Jan – May 2022 b. Water volume monitoring is to ensure the consumption meet targeted <1 lt/mt FFB produced by GJBE. So far, the average achievement as of May 2022 was 0.9 lt/mt FFB. c. Construction of roadside drain pit been practise as rainwater collection method for field use d. Establishment of river buffer zone and monitoring river water quality. Latest analysis of sample by Dynakey Laboratories Sdn. Bhd.; Certificate of Analysis # W211111/01A; Date: 2/12/2021 resulted in good condition of river water e. Conservation of natural riparian areas were implemented with proper signages and practice of zero chemical and fertilizer within riparian and buffer zones to maintain natural vegetation f. GJBE use only surface water through river for both operational and domestic use. No underground bore well construct by GJBE. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|---|------------|
| 4.5.5.2 | No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance - | Based on the field visit to river riparian and buffer zone, no construction of bunds, weirs and dams across main rivers or waterways passing through GJBE. | Complied |
| 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). - Minor compliance - | Construction of roadside drain pit had been practised by GJBE as rainwater collection method for field use. | Complied |
| Criterion 4.5.6: Status of rare, threatened, or endangered species and 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 - | Information available as per Full Report on the Determination and Management of High Conservation Value (HCV) Sites and Social and Environmental Impact Assessment within the New Planting Sites of Genting Jambongan Estate, Jambongan Island, Sabah; Assessment period: Oct 2009 to Jul 2010; Initial site assessment 20 -23 Oct 2009; Field investigation 4 -8 Aug 2014. a) Identified high biodiversity value habitats expressed as High Conservation Value (HCV) as following: <ul style="list-style-type: none"> HCV 1.2 Threatened and Endangered Species – Proboscis Monkey and False Gharial HCV 4.2 Erosion Control – portion of Blocks 51, 55 and 56 were too steep for planting HCV 5 Basic Needs to Local Communities. b) The assessment report also addressed that the oil palm planting did not significantly affected the conservation status as per The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|---|------------|
| | | habitat requirements of rare, threatened, or endangered species as long as GJBE continuously implemented the actions and monitoring to maintain the HCV as recommended by assessor | |
| 4.5.6.2 | <p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p>- Major compliance -</p> | <p>Based on the recommendation from HCV assessment, Genting Jambongan Estate has established the management plan as documented in Management and Monitoring Plan for HCV areas within Genting Jambongan Estate. The plan was latest reviewed in January 2022. Among the management action established are:</p> <ul style="list-style-type: none"> • Install signage on riparian and buffer zone with no illegal hunting and collecting and no unauthorized entry • Regular patrol to all riparian, buffer zone and boundary area • Socialize the HCV assessment which consist of identification, management and monitoring to all employee • Inform all stakeholders on the HCV assessment and monitoring during stakeholder's consultation meeting | Complied |
| 4.5.6.3 | <p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p> | Based on the field visit to river riparian and buffer zone, the plan established has been effectively implemented by GJBE. Patrolling reports by the auxiliary police were also available for verification. | Complied |
| Criterion 4.5.7: Zero burning practices | | | |
| 4.5.7.1 | <p>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.</p> <p>- Major compliance -</p> | <p>GJBE adopted Genting Plantation Berhad's Zero Burning Policy as published in company's website via link as following: https://www.gentingplantations.com//wp-content/uploads/2022/05/GENP-Zero-Burning-Policy.pdf</p> | Complied |

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|---|---|---|------------|
| | | It was verified during the field visit that there is no use of fire for planting preparation. No fire for domestic wastes too as it was disposed through designated landfill. | |
| 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 issue of significant risk of highly disease crop spread within GJBE hence no fire treatment required. | N/A |
| 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. - Major compliance - | No issue of significant risk of highly disease crop spread within GJBE hence no fire treatment required. | N/A |
| 4.5.7.4 | Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance - | No replanting program has been established for the next 5 years as the oldest palm is only 17 years old planted in 2004. For future replanting, the SOP already included with methods of zero burning and crops should be felled down and chipped by machine. | Complied |
| 4.6 Principle 6: Best Practices | | | |
| Criterion 4.6.1: Site Management | | | |
| 4.6.1.1 | Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance - | Standard Operating procedure has been addressed in the Sustainability Management Procedure Manual Update June 2022, Standard Operating Procedures (SOP) Revision 3 dated 11/10/2013 and The Oil Palm Manual. The manual covering the activity for future replanting, oil palm nursery practices, planting techniques, soil conservation and terracing, pest and diseases, weed management, manuring of oil palm, immaturity, harvesting, crop forecasting and managing difficult soils. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|------------|
| | | All the activities have been described comprehensively in the Standard operating procedure (SOP) and pictorial SOP. The estate implemented the SOPs through its daily operations. | |
| 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 either soil, nutrients or chemicals. - Major compliance - | Generally, the soil conservation measures implemented at the sloping land are construction of terrace, establishment of cover crop and construction of roadside drain. This is guided by the SOP Steep Slopes Management Doc No. SMP-GPB-10 dated 18/03/2021. The objective was to ensure soil conservation, prevention, control of erosion and safety at steep slopes. | Complied |
| 4.6.1.3 | A visual identification or reference system shall be established for each field. - Major compliance - | Verification through site visit, management has place field marking that contained information of Field Number, Block, and hectareage. Estate’s maps where the following details were available for reference: <ul style="list-style-type: none"> • Soil Map • Slope class map • Blocking map • Riparian buffer zone map | Complied |
| Criterion 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 - | Annual business plan is addressed in the form of annual budget and the projection for 5 years (2022-2026). It has the information about projected FFB production, finance allocations for operations such as harvesting and field upkeep, administration and capital expenditure. | Complied |
| 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 | No replanting program has been established for the next 5 years as the oldest palm is only 17 years old planted in 2004. | Complied |

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|--|---|--|------------|
| | years. - Major 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) Financial indicators: cost benefit, discounted cash flow, return on investment - Major compliance - | Verification of the 2022 budget showed that the information such as crop projection, cost of production and return of investment was available. | 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 - | Monitoring of actual expenses against the allocated budget for the field operation is reported monthly and justification of underspent or overspent can be seen in the monthly expenditure and progress report. | Complied |
| Criterion 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 - | Pricing mechanism for product and services was normally done through opened tender or comparison of quotations. Opened tender is guided by Tender Procedure (doc. no.: PLA-02, rev. 2, dated 17/12/2020) and comparison of quotations is guided by Capital Expenditure, rev. 1, dated 31/05/2013, which has the details about request of quotations and limit of approval by designations. To-date, there has been no complaint lodge by suppliers or service providers with regards to the pricing mechanism. | Complied |

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|------------------------------------|---|---|------------|
| 4.6.3.2 | All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance - | Verification of payment advice for transporting FFB showed that the payments were made in timely manner (agreed timing is within 30 days from the date the transportation work is carried out) and amount is in accordance with the contract agreements. Interview with contractors also confirmed that payment was made promptly. | Complied |
| Criterion 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. - Major compliance - | The contractors engaged by the estate management has signed agreement prior to provide services. There were clauses where the contractors shall ensure compliance with the requirements of RSPO, ISCC, MSPO and OSHA 1994. Interview with the contractor confirmed that MSPO requirements were briefed by the management and has a good understanding with the requirements. | Complied |
| 4.6.4.2 | The management shall provide evidence of agreed contracts with the contractor. - Major compliance - | Contract agreements between the estates and the contractors were available for verification. All the agreements are valid until 31/12/2022. Among the contractors verified were Syarikat CM and Pengangkutan Yee Kiun. | Complied |
| 4.6.4.3 | The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance - | Genting Jambongan Estate certification unit has no objection to allow BSI auditors to verify the assessment through physical inspection if required. The contractors have signed an addendum of their contract agreement that requires them to provide cooperation and relevant access to appointed CB into their respective operations, systems and all information when this is announced in advance. | Complied |
| 4.6.4.4 | The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. | Delivery of task is verified by the estates before proceeding for payment. Evaluation of task was normally done through utilisation of the company's "Schedule of Work Completed" (SOWC) – General Work | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|---|------------|
| | - Major compliance - | Order. Verification of the forms showed that checking of tasks were done and acknowledged by the contractors. | |
| 4.7 Principle 7: Development of new planting | | | |
| Criterion 4.7.1: High biodiversity value | | | |
| 4.7.1.1 | Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance - | Not applicable since no new development within GJBE. | N/A |
| 4.7.1.2 | No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance - | Not applicable since no new development within GJBE. | N/A |
| Criterion 4.7.2: Peat Land | | | |
| 4.7.2.1 | New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance - | Not applicable since no new development within GJBE. | N/A |
| Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA) | | | |

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|--|--|--|------------|
| 4.7.3.1 | A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance - | Not applicable since no new development within GJBE. | N/A |
| 4.7.3.2 | SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance - | Not applicable since no new development within GJBE. | N/A |
| 4.7.3.3 | The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance - | Not applicable since no new development within GJBE. | N/A |
| 4.7.3.4 | Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance - | Not applicable since no new development within GJBE. | N/A |
| Criterion 4.7.4: Soil and topographic information | | | |
| 4.7.4.1 | Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance - | Not applicable since no new development within GJBE. | N/A |
| 4.7.4.2 | Topographic information shall be adequate to guide the | Not applicable since no new development within GJBE. | N/A |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|--|------------|
| | planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance - | | |
| Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils | | | |
| 4.7.5.1 | Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance - | Not applicable since no new development within GJBE. | N/A |
| 4.7.5.2 | Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance - | Not applicable since no new development within GJBE. | N/A |
| 4.7.5.3 | Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance - | Not applicable since no new development within GJBE. | N/A |
| Criterion 4.7.6: Customary land | | | |
| 4.7.6.1 | No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance - | Not applicable since no new development within GJBE. | N/A |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| 4.7.6.2 | Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance - | Not applicable since no new development within GJBE. | N/A |
| 4.7.6.3 | Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance - | Not applicable since no new development within GJBE. | N/A |
| 4.7.6.4 | The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - Major compliance - | Not applicable since no new development within GJBE. | N/A |
| 4.7.6.5 | Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance - | Not applicable since no new development within GJBE. | N/A |
| 4.7.6.6 | A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance - | Not applicable since no new development within GJBE. | N/A |
| 4.7.6.7 | The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance - | Not applicable since no new development within GJBE. | N/A |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| 4.7.6.8 | Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance - | Not applicable since no new development within GJBE. | N/A |

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

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|------------|
| 4.1 Principle 1: Management commitment & responsibility | | | |
| Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy | | | |
| 4.1.1.1 | Policy for the implementation of MSPO shall be established. - Major compliance - | Genting Oil Mills (Sabah) Sdn Bhd has developed Malaysian Sustainable Palm Oil (MSPO) Policy, version dated 18/03/2014 signed by President & Chief Operating Officer, Mr. Yong Chee Kong. The company ensure compliance with MSPO and the MPOB Code of Practice requirements. Briefing of the policy was conducted on 10/02/2022 to the workers. Seen the training attendance list. | Complied |
| 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 - | In the policy above, the company also committed to continue to assess and develop new and innovative techniques, approaches, and practices with the objective of continuous improvement in the journey towards achieving sustainable palm oil. | 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. - Major compliance - | Internal audit plan was established to carry internal audit for MSPO Part 4 and RSPO P&C in the Mill. Refer RSPO & MSPO Internal Audit Report dated 17/06/2022. Internal Audit has been conducted on 09-10/06/2022 from the Sustainability units. Seen the RSPO & MSPO Internal Audit Report where total 4 observations were raised. Action plan, person-in-charge, timeline and status of the observation was developed and updated. | Complied |
| 4.1.2.2 | The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of | Genting Oil Mills (Sabah) Sdn Bhd has developed Sustainability Internal Audit procedure with Doc. No.: SMP-GPB-03, Rev. 06 dated | Complied |

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|--|--|--|------------|
| | strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance - | 09/07/2021 to plan and implement internal audits to determine conformance to the applicable sustainability standards' requirements such as RSPO, MSPO and ISCC. The frequency of the audit is not less than once a year. Refer RSPO & MSPO Internal Audit Report dated 17/06/2022. Internal Audit has been conducted on 09-10/06/2022 from the Sustainability units. Seen the RSPO & MSPO Internal Audit Report where total 4 observations were raised. Action plan, person-in-charge, timeline and status of the observation was developed and updated. No non-conformity was raised during the audit. | |
| 4.1.2.3 | Reports shall be made available to the management for their review. - Major compliance - | Refer RSPO & MSPO Internal Audit Report dated 17/06/2022. Internal Audit has been conducted on 09-10/06/2022 from the Sustainability units. The report was available to the management for review. | Complied |
| Criterion 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 - | RSPO & MSPO Management Review meeting was conducted on 17/06/2022 for both Genting Jambangan Oil Mill (GJOM) and Genting Jambangan Estate (GJBE). The meeting was chaired by Mill Manager and attended by relevant personnel from both mill and estate. Meeting minutes was available. Among agenda in the meeting were: <ol style="list-style-type: none"> 1. Status of the outstanding issues from previous meetings 2. Changes, improvement, or modification of the sustainability management system 3. Internal and external audit findings on Sustainability Management System 4. Complaint and grievances book 5. Enquiry Register Book | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|---|------------|
| | | 6. Stakeholder Meeting reports / Minutes 7. Green House Value (ISCC, MSPO & RSPO) 8. Review Continual Improvement Status and its recommendation Review on Resource & Training Requirement 9. Review on Resources & Training requirement 10. Review of sustainability Policy and its objective status 11. Review of effectiveness in achieving quality, environmental, social, safety and health objectives 12. Compliance status on legal and other requirement 13. Any other matters 14. Preventive and corrective action 15. Recommendation for improvement 16. Customer feedback 17. Follow up actions from management review 18. Changes that could affect the management system 19. Management review meeting conclusion | |
| Criterion 4.1.4 – 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. - Major compliance - | The action plan for continual improvement with regards to social and environment impacts, and opportunities were available in the estate in various forms such as social action plan, environmental management plan, and water management plan to name a few. The plans have the information about the RSPO/MSPO Requirement, Objective/Description, Action Plan, Monitoring / Verification / Target, PIC Target/ Timeline, Results/ Remarks/ Status. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|---|------------|
| | | <p>Among the action plan were:</p> <ol style="list-style-type: none"> 1. To improve on Environmental Aspects and Impacts risk assessment and risk control – Regular monitoring of water quality and take necessary action when poor water quality observed. 2. Continue make full use of the biomass wastages - Keep communication with the estates for the usage of biomass waste 3. Improve condition of tractors i.e. leaking to prevent pollution and improve safety as well as productivity – Carry out necessary repairs stage by stage. 4. To in still good health & safety culture in the community – Display safety campaign, Carry out safety audit periodically 5. To improve interior and exterior of workers quarters – Carry out interior and exterior painting for workers quarters | |
| 4.1.4.2 | <p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.</p> <p>- Major compliance -</p> | <p>The new information and techniques to improve practices are obtained mainly through information from suppliers and being members of associations related to palm oil industry (e.g. ISP). The mill continuously ensures there are improvement practices in line with new information and techniques introduced in the workforce. Since the last assessment, there was no new technology adopted.</p> | Complied |
| 4.2 Principle 2: Transparency | | | |
| Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements | | | |
| 4.2.1.1 | <p>The management shall communicate adequate information to other stakeholder on environmental, social and legal issues</p> | <p>Genting Oil Mills (Sabah) Sdn Bhd has developed Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 23/02/2018 for the effective internal and external</p> | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | <p>relevant to sustainable practices in the relevant languages and forms.</p> <p>- Major compliance -</p> | <p>communication of sustainability requirements and responding to communications from local communities and other affected or interested parties. Meeting shall be carried out at least six monthly and annually for internal and external stakeholders. The topics to be discussed such as complaint & grievances, environmental and biodiversity concerns, social issue and suggestions for improvement. The procedure has been briefed to the internal and external stakeholders. Briefing to the external stakeholders was conducted during the stakeholder meeting conducted on 14/05/2022. Issues raised and actions taken during the stakeholders meeting were well recorded in a management plan and made available for verification.</p> | |
| 4.2.1.2 | <p>The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p> | <p>Genting Oil Mills (Sabah) Sdn Bhd has developed Procedures on Requests and Responses with Doc. No.: SMP-GPB-25, Rev. 0 dated 14/08/2014 to define the responsibilities to respond constructively and promptly to the information requested by stakeholders. Based on the procedure, the list of documents which are publicly available as follows:</p> <ul style="list-style-type: none"> • Company annual report • Group policies • Reports related to environment such as EIA, EAI • RSPO external audit reports • Pollution prevention plan • Continuous improvement plan • Complaints and grievances book and its procedure • Negotiation and compensation procedure • Sexual harassment procedure | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|--|------------|
| | | <p>GJBE has issued the list of documents that could be requested by the stakeholders to all the relevant stakeholders of the mill. The stakeholders are required to register in Enquiry Register Book prior to access to the documents. The list of documents not limited to:</p> <ul style="list-style-type: none"> • Land title • Policies • Reports – EAI, SIA, HCV and audit reports • Management plans • Procedures <p>The stakeholders were briefed on the request and response during the stakeholder meeting conducted on 14/05/2022.</p> | |
| Criterion 4.2.2 – Transparent method of communication and consultation | | | |
| 4.2.2.1 | <p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p> | <p>Genting Oil Mills (Sabah) Sdn Bhd has developed Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 23/02/2018 for the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties. Meeting shall be carried out at least six monthly and annually for internal and external stakeholders. The topics to be discussed such as complaint & grievances, environmental and biodiversity concerns, social issue and suggestions for improvement.</p> | Complied |
| 4.2.2.2 | <p>The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i>.</p> <p>- Minor compliance -</p> | <p>The Mill Manager has been appointed by Senior Manager Operations to be the representative for ISCC, RSPO and MSPO related matters. Appointment letter dated 03/01/2022 was made available for verification.</p> | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| 4.2.2.3 | <p>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.</p> <p>- Major compliance -</p> | <p>Stakeholder list for GJBE was made available for verification. The stakeholders such as contractors, suppliers, local communities and government authorities were included into the list.</p> <p>A combined stakeholder meeting was conducted on 14/05/2022 in GJBE. Stakeholders such as local communities, local authorities, contractors and suppliers were invited and attended the meeting. Seen the meeting minutes and requests from the stakeholders were recorded in the minutes.</p> | Complied |
| Criterion 4.2.3 – Traceability | | | |
| 4.2.3.1 | <p>The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.</p> <p>- Major compliance -</p> | <p>Genting Oil Mills (Sabah) Sdn Bhd has developed the traceability procedure with Supply Chain and Traceability, Doc. No.: SMP-GPB-23 dated 03/12/2021 and GENP Supply Chain and Traceability, Doc No: SMP-GPB-33, Rev. 00 dated 27/07/2020. The SOP was to ensure the handling of outgoing CPO and PK are carried out in the proper manner to ensure traceability and to meet the sustainability requirements.</p> | Complied |
| 4.2.3.2 | <p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p>- Major compliance -</p> | <p>Inspection on compliance with the traceability procedure is regularly checked through supply chain internal audit. The internal audit report, which was written together with other schemes audit such as RSPO and ISCC, was available for verification (see Criterion 4.1.2 for details).</p> | Complied |
| 4.2.3.3 | <p>The management shall identified and assign suitable employees to implement and maintain traceability system.</p> <p>- Minor compliance -</p> | <p>Genting Oil Mills (Sabah) Sdn Bhd has defined the roles and responsibilities for the implementation and maintenance of its traceability system in the Traceability (Mill) procedure. Refer Appointment letter as Person In Charge for Supply Chain, Traceability and Mass Balance requirement of RSPO, ISCC and MSPO Sustainability Standards dated 03/01/2022.</p> | Complied |

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|---|---|-----------------------|-----------------------|------------|------------|------------|-------------|--------------|-------------------|-----------|--------------------|--------------------|--------------------|------------|-------|-------|-------|------|------------|------------|------------|------------|------------------|------------------|------------------|-----------|-----------------------|-----------------------|-----------------------|------------|-------|-------|-------|-----------------|
| <p>4.2.3.4 Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.</p> <p>- Major compliance -</p> | <p>Records of storage, sales, delivery or transportation of crude palm oil and palm kernel are maintained in various forms such as:</p> <ul style="list-style-type: none"> • Mass Balance Worksheet – monthly input • Local Sales Delivery Advice (LSDA) • Incoming FFB Records • Outgoing CPO Records • Outgoing PK Records Based on the mass balance accounting <p>CPO was sent to Genting Musimmas Refinery Sdn Bhd and PK was sent to IOI Edible Oils Sdn Bhd with contract no SGOMS/CPO/2203/J01 and SGOMS/PK/2205/J02 respectively. Sample record of CPO and PK as below:</p> <p>PK</p> <table border="1" data-bbox="1048 890 1865 1093"> <thead> <tr> <th>Date</th> <th>03/02/2022</th> <th>14/03/2022</th> <th>24/05/2022</th> </tr> </thead> <tbody> <tr> <td>Ticket No.</td> <td>PK22000005W</td> <td>PK220000044W</td> <td>PKMB22000041 W</td> </tr> <tr> <td>Lorry No.</td> <td>SS3917W – Bin47</td> <td>SS1580J – Bin49</td> <td>SS3917W – Bin43</td> </tr> <tr> <td>Weight, MT</td> <td>12.86</td> <td>13.24</td> <td>12.73</td> </tr> </tbody> </table> <p>CPO</p> <table border="1" data-bbox="1048 1181 1865 1380"> <thead> <tr> <th>Date</th> <th>20/03/2022</th> <th>18/05/2022</th> <th>14/02/2022</th> </tr> </thead> <tbody> <tr> <td>Ticket No.</td> <td>CPO22000064 W</td> <td>CPO22000112 W</td> <td>CPO22000002 W</td> </tr> <tr> <td>Lorry No.</td> <td>SAB3143V – SS2214V</td> <td>SAB3144V – SS2216V</td> <td>SAB4031V – SS2215V</td> </tr> <tr> <td>Weight, MT</td> <td>36.15</td> <td>36.13</td> <td>36.00</td> </tr> </tbody> </table> | Date | 03/02/2022 | 14/03/2022 | 24/05/2022 | Ticket No. | PK22000005W | PK220000044W | PKMB22000041 W | Lorry No. | SS3917W – Bin47 | SS1580J – Bin49 | SS3917W – Bin43 | Weight, MT | 12.86 | 13.24 | 12.73 | Date | 20/03/2022 | 18/05/2022 | 14/02/2022 | Ticket No. | CPO22000064 W | CPO22000112 W | CPO22000002 W | Lorry No. | SAB3143V – SS2214V | SAB3144V – SS2216V | SAB4031V – SS2215V | Weight, MT | 36.15 | 36.13 | 36.00 | <p>Complied</p> |
| Date | 03/02/2022 | 14/03/2022 | 24/05/2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ticket No. | PK22000005W | PK220000044W | PKMB22000041 W | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Lorry No. | SS3917W – Bin47 | SS1580J – Bin49 | SS3917W – Bin43 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Weight, MT | 12.86 | 13.24 | 12.73 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Date | 20/03/2022 | 18/05/2022 | 14/02/2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Lorry No. | SAB3143V – SS2214V | SAB3144V – SS2216V | SAB4031V – SS2215V | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Weight, MT | 36.15 | 36.13 | 36.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | Assessment Findings | Compliance | |
|--|---|---|-----------------|
| 4.3 Principle 3: Compliance to legal requirements | | | |
| Criterion 4.3.1 – Regulatory requirements | | | |
| 4.3.1.1 | <p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p> | <p>GJOM monitored compliance with applicable local, state, national and ratified international laws and regulations through evaluation of compliance. Among the evidence of legal compliance verified were as follows:</p> <ol style="list-style-type: none"> 1. DOE License no. 005264 with Compliance schedule no. ASSH(B)31/152/000/185 valid until 30/06/2022 2. DOE Contradiction License no. 005162 Compliance schedule no. ASSH(B)31/152/000/185 valid until 31/12/2022 3. Mill’s MPOB license no. 620052004000 valid until 28/02/2023 4. Diesel permit no. S002548 with Doc No: PPDNKK.SDK.25/20025(SK) valid till 02/08/2024. 5. Petrol permit no. S006341 with Doc No: KPNHEP.SDK.35/2022(PK) valid till 24/04/2023 6. Private Installation license, no. 2022/01276 valid until 26/04/2023 7. Weighbridge B1843954 with Sticker No: 2.1KQ026912, 60,000 kg inspected on 02/12/2021 by Metrology Corporation Malaysia Sdn Bhd. 8. Weighbridge B1843953 with Sticker No: 2.1KQ026911, 60,000 kg inspected on 02/12/2021 by Metrology Corporation Malaysia Sdn Bhd. 9. S/N: 600-1/2/13/9 Jld.6 (08/SDK/2020-0285) for maximum overtime per month is 120 hours which valid until 26/08/2022. | <p>Complied</p> |

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| | | S/N: 600-1/2/13/9 Jld.6 (05/SDK/2020-0284) for female workers to work from 10pm to 5am which valid until 25/08/2022. | |
| 4.3.1.2 | The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance - | All related legal requirements had been documented in "Master List of Legal Requirements & Best Practices Applicable to Plantation Operations in Malaysia". Refer latest email from headquarters dated 14/05/2022 stated on updating of Minimum Wages Order 2022 and Windfall Profit Levy (Oil Palm Fruit) (Amendment) Order 2021. | 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 process of law changes Addressed in Legal Requirement Register, Doc no. SMP-GPB-22 rev. 09 dated 08/09/2020. Notification of changes from various source of information i.e. Lawnet, government gazette and sustainability team based in the Sandakan HQ. 1. Monitoring for changes in the Law 2. Clarification and review on the changes 3. Updating of the Legal register administered internally 4. Notification to the operating units and/or the relevant person in charge The established legal register has incorporated the latest changes of law. Refer latest email from headquarters dated 14/05/2022 stated on updating of Minimum Wages Order 2022 and Windfall Profit Levy (Oil Palm Fruit) (Amendment) Order 2021. | Complied |
| 4.3.1.4 | The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - Minor compliance - | The Chief Clerk had been assigned as the PIC for monitoring compliance and updating changes in law Refer Appointment letter as Sustainability Coordinator for ISCC, RSPO and MSPO Related Matters to Chief Clerk Mdm. Zetty Rahiza Hamzaril dated 03/01/2022. Checking of status compliance was regularly done through the utilisation of form no. SP-MGR-03-F03- 0, rev. 13 | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|---|------------|
| Criterion 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 - | GJOM is located inside of the land of GJBE, Title No. Country Lease 085325622. The land is belonging to Genting Oil Mills (Sabah) Sdn Bhd. Sighted the copy of the land title. There is no issue on land use claims evidence during the audit. Interviewed with the local communities confirmed that no land encroachment or land dispute reported. | 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 - | GJOM is located inside of the land of GJBE, Title No. Country Lease 085325622. The land is belonged to Genting Oil Mills (Sabah) Sdn Bhd. Verified the copy of the land title. There is no issue on land use claims evidence during the audit. Interviewed with the local communities confirmed that no land encroachment or land dispute reported. | Complied |
| 4.3.2.3 | Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance - | GJOM located within GJBE land area. Legal perimeter boundary markers for GJBE sighted clearly demarcated and visibly maintained on the sample field Block 15; Coordinate: 6° 38" 23.676' N; 117° 26" 1.6548' E at a boundary to smallholder. All boundaries are marked in the documented boundary stone map # 174N/496E. | Complied |
| 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). - Minor compliance - | There is no land dispute in the GJOM at the time of audit. The land belongs to Genting Oil Mills (Sabah) Sdn Bhd and land ownership documents verified. Interview with the local communities confirmed that no land encroachment or land dispute reported. | Complied |
| Criterion 4.3.3 – Customary rights | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|--|------------|
| 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. - Major compliance - | There is no customary land or negotiated agreements within the GJOM's land area. | N/A |
| 4.3.3.2 | Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance - | The right to use the land is not disputed and there was no customary land within the GJOM. | N/A |
| 4.3.3.3 | Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance - | There is no land dispute or customary rights issues in GJOM. | N/A |
| 4.4 Principle 4: Social responsibility, health, safety and employment condition | | | |
| Criterion 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 - | Social Impact Assessment (SIA) & Human Rights Impact Assessment (HRIM) Report was reviewed on April 2021 for both GJOM and GJBE by Sustainability Department. The assessment has involved relevant stakeholders such as schools' representatives, local authorities and workers. No negative impact was identified during the assessment through interview. Social Management and Monitoring Plan of Genting Jambongan Mill was reviewed and last updated on 13/06/2022. The next SIA is planned to be conducted in August 2022 where the forced labour element will be included. | Complied |
| Criterion 4.4.2: Complaints and grievances | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| 4.4.2.1 | A system for dealing with complaints and grievances shall be established and documented. - Major compliance - | Genting Oil Mills (Sabah) Sdn Bhd has established Complaints and Grievances procedure with Doc. No.: SMP-GPB-19, Rev. 04 dated March 2020 to provide guidelines on handling complaints & grievances involved internal and external stakeholders. All the written confidential complaints shall be dealt by Manager. The timeframe for the action to be taken depends on seriousness of the complaints or grievance. The accepted timeframe to acknowledge and respond to the complaint or grievances is within 1 month upon receipt. | 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 - | The mill has implemented Complaints/ Grievances Record Book to record any complaint or grievance received. Most of the complaints were of road conditions by the local communities and maintenance of housing facilities. Based on verification of the complaints/grievance records, all the issues were resolved in appropriate manner. | Complied |
| 4.4.2.3 | A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance - | The Complaints/Grievances Record Book serves as complaint forms and made available in the office. Apart from that, complaints can also be lodged through a complaint box which was available at the labour quarters and security post. Interview with the workers and stakeholders confirmed that they are aware of both mechanisms. | Complied |
| 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. - Minor compliance - | Briefing to the external communities was conducted on 14/05/2022 during the stakeholder meeting. Interviewed with the external stakeholders confirmed that they are aware of the complaint procedure. | Complied |
| 4.4.2.5 | Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance - | Records of complaint or grievance for June 2020 were available for review during the audit. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|---|------------|
| Criterion 4.4.3: Commitment to contribute to local sustainable development | | | |
| 4.4.3.1 | <p>Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.</p> <p>- Minor compliance -</p> | <p>Genting Jambongan Oil Mill is situated in an island and surrounded by several villages. The company and the local community, including schools, have established good relationship between them ever since the setup of the estate in the island. Among the contributions provided by the company are road maintenance, distribution of clean water to local communities, and monetary donations to the schools. The existence of the company has also provided a good job opportunity to the locals and many of them are currently working for the company.</p> | Complied |
| Criterion 4.4.4: Employees safety and health | | | |
| 4.4.4.1 | <p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p> | <p>The Occupational Safety and Health Policy had been established, signed by President & Chief Operating Officer on 01/07/2018. The policy was communicated to the employees through various methods such as training, morning muster, and display on notice boards. Policy briefing has been conducted on 10/02/2022. Training materials, attendance and photos was available for verification. Training evaluation record Doc No: PM-MGR-05-F03-0 dated 10/02/2022 were recorded for workers.</p> | Complied |
| 4.4.4.2 | <p>The occupational safety and health plan should cover the following:</p> <p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risk of all operations shall be assessed and documented.</p> | <p>OSH Plan was established.</p> <p>a) The Occupational Safety and Health Policy had been established, signed by President & Chief Operating Officer on 1/7/2018. The policy was communicated to the employees through various methods such as training, morning muster, and display on notice boards. Policy briefing has been conducted on 10/02/2022. Training materials, attendance and photos was available for</p> | Complied |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|------------|
| <p>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:</p> <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labelling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept and the concerns of employees and any remedial actions taken shall be recorded.</p> | <p>verification. Training evaluation record Doc No: PM-MGR-05-F03-0 dated 10/02/2022 were recorded for workers.</p> <p>b) SOP for HIRARC (SP-MGR-01) was made available. The technique was described accordingly in the SOP. The HIRARC was last reviewed on 03/01/2021 to include all the activities in the mill. There are 41 operation discussed in the HIRARC with reference number SP-MGR-01-F01-0 Rev. 08 and Rev. 09.</p> <p>Chemical Health Risk Assessment (CHRA) was conducted in compliance with Occupational Safety and Health (USECHH) regulation 2000 on 10/12/2019 by Rehpro Scientific Sdn Bhd. The report RSSB/CHRA/2019-156 was available for verification.</p> <p>Medical Surveillance was conducted to establish workers health status when they work in an environment where they are exposed to particular hazards such a Manganese. The Mill has conducted the medical surveillance on 28/07/2021 for 4 workers at Klinik Mabello (Paris) Sdn Bhd where no workers was needed for Medical Removal Protection (MRP) due to health hazardous side effect. The next medical surveillance was due on 04/08/2022. There are 3 workers recommended for further medical attention due to have some non-occupational related medical conditions. Management has sent for further check up on 22/12/2021 to OHD from Mabello Groups of Clinics. Management has proposed to conduct the next medical surveillance on 06/07/2022 as per letter evidence from Klinik Mabello (Paris) Sdn Bhd dated 21/06/2022.</p> <p>Noise Risk Assessment was conducted by Sherman Services & Supply dated 19-20/04/2021 and Report with reference SSS/NOISE-302/21 dated 20/04/2021 was available for verification.</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|------------|
| <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p> | <p>Annual & Baseline Audiometric Testing was conducted for the year of 2022 for all workers exposed to excessive noise in the mill by DAB OH Sdn Bhd dated 25/01/2022. 26 workers were examined, and the results indicated that 25 workers were having Normal hearing while 1 worker fall under Abnormal Audiogram and none of workers fall under Standard Threshold Shift. Notification of STS and NIHL has been submitted on 13/08/2020. For 2021, Audiometric test has been conducted on 04 & 11/10/2021. 10 workers were having Hearing Impairment, 32 workers were having Standard Threshold Shift. Retest was conducted on 24/01/2022 and report yet to receive by the Mill.</p> <p>c) Training matrix and training programme were established by the management. Evidence of adequate and appropriate training on safe working practices provided to workers was sighted, for example training for workers on Spillage CPO Response Training on 16/04/2022.</p> <p>d) Issuance of PPE to employees is recorded in a standard form which has the information about name of employee, type of PPE, workstation, date of issuance and acknowledgment of receipt. Refer record New/ Replace Personal Protective Equipment record as at June 2022.</p> <p>e) SOP for handling chemical management was addressed in Chemical Management procedure (SP-MGR-08), Rev 01, dated 01/08/2017. The procedure outlines the handling of chemicals in accordance to the regulation. Spillage Chemical Response Training has been conducted on 16/04/2022.</p> <p>f) Safety and health committee was established and chaired by Acting Manager as per Appointment Letter evidence dated 03/01/2022. SHC Organization – Chairman: Mill Manager, SHC</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
|--|---|------------|
| | <p>secretary: Weighbridge Clerk. Organization chart of OSH committee dated 20/01/2021 was available</p> <p>g) Records were available confirming that quarterly OSH meetings had been held at the Genting Jambongan Palm Oil Mill with latest 4 OSH Minutes of Meeting dated 23/04/2022, 26/01/2022, 30/10/2021 and 17/07/2021.</p> <p>h) ERT Committee has been appointed for the year of 2022. The mill has site specific Plans in the System Procedure, Emergency Response Procedure (SP-MGR-04), Rev:01, dated 01/08/2017) including ERP for oil spillage, fire in the mill, effluent overflow, accident and chemical spillage. Maps showing assembly areas and up-to-date lists of emergency contacts were also established. Latest Fire Fighting training has been conducted on 28/04/2022.</p> <p>i) First aid box was available at each workstation visited. Monitoring of First Aid Box has been conducted on monthly basis. Latest inspection conducted on 27/05/2022 by HA. There are 4 first trained aiders in the mill and there are 4 units of first aid kit provided at various workstations at the mill. Checking on contents of first aid box found in order. Training has been conducted on 17/12/2021.</p> <p>j) All accidents are to be investigated and reported to Head Office. It also has been discussed in the OSH Quarterly Meeting. Refer Minutes of meeting dated 23/04/2022 section 3.0 Accident Report. JKPP 8 report has been submitted on 08/01/2022 with reference number JKPP8/96520/2021. There are no accidents recorded for the year of 2021.</p> | |
| <p>Criterion 4.4.5: Employment conditions</p> | | |

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| 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 - | Genting Oil Mills (Sabah) Sdn Bhd has established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company respect human rights and support international human rights law. Briefing of the policy was conducted on 10/02/2022 to the workers during morning muster. Seen the training attendance list. | Complied |
| 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 - | Genting Oil Mills (Sabah) Sdn Bhd has established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company shall not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation. | 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 - | There were employment contracts for staffs and workers. Pay and conditions are documented and achieved the Minimum Wage Order 2020. Sampled of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Sabah Ordinance which have been signed by the worker. Sampled of total 10 payslips for Oct 2021, Feb 2022 and May 2022. found that all the workers were paid accordingly. | 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 - | The mill did not engage any permanent contractor to work in the mill. Only based on project basis and there were no permanent workers engaged by the contractor. | Complied |
| 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 | The mill has registered all the workers into the system Lintramix where record of full name, employee no., date joined, gender, date of birth, wages and type of work were clearly stated in the list. | Complied |

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| | contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - 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 contract shall be made available for each and every employee indicated in the employment records. - Major compliance - | All the workers are employed under direct employment. 7 employment contracts were sampled and found that terms and conditions of the employment were clearly stated in the contract and signed by the workers. | 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 mill management has implemented punch card system to monitor the working hours and overtime of the workers. All the records were transparent to the workers. The workers were paid as per Sabah Ordinance for the overtime carried out. This has confirmed through interview with the workers. | 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 - | Interview with the workers confirmed that they have rest time in between of the working hours. Overtimes were paid according to the rate stated in the agreement and regulatory requirements. The overtime offered upon mutually agreement. | Complied |
| 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 - | Wages and overtime were paid according to Sabah Ordinance and punch card of the workers. Total hours of overtime and daily attendance has recorded in the Lintramix System and the pay slips. Refer to indicator 4.4.5.3. | 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 | All the workers are provided with free medical facilities. Free housing facilities were provided to all the workers and their families. Free transport to send the children of the workers to school. Place of | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|---|----------------------|
| | development, medical care provisions and improvement of social surroundings. - Minor compliance - | worship was available in the compound of estate for all the workers and their family members. | |
| 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 management has provided free housing facilities to all the workers. Basic amenities such as water and electricity were provided to the workers. Line-site inspection was carried out on weekly basis by the Estate Hospital Assistant. Based on verification of the inspection records, any issues identified were recorded and appropriate actions were taken accordingly. However, the treated water analysis for the mill’s labour quarters was only carried out three times in 2021 [report ref.: #W210121/04 (dated 21/01/2021), #W210527/01 (dated 27/05/2021) and #W211028/01 (dated 28/10/2021)]. This is not in compliance with Clause 4.3 of the GPB’s SMPM Water Sampling and Analysis (doc. no.: SMP-GPB-15, rev. 01, dated 12/11/2014) which requires the analysis to be carried out on a quarterly basis. Hence a Minor NC has been raised. | Minor Non-Conformity |
| 4.4.5.12 | The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance - | Genting Oil Mills (Sabah) Sdn Bhd has established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited. Reproductive rights are protected. Briefing of the policy was conducted on 24/09/2020 to the workers during morning muster. Seen the training attendance list. Procedure on Prevention and Eradication of Sexual Harassment at the Workplace was established with Doc. No.: SMP-GPB-20, Rev. 0 dated | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|--|------------|
| | | <p>11/10/2013. Process of handling sexual harassment complaint was outlined in the procedure.</p> <p>Gender Committee was established in the estate and seen the last meeting was conducted on 15/01/2022. There was no case of sexual harassment and violence reported.</p> | |
| 4.4.5.13 | <p>The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p> | <p>There is no trade union in any of the visited estates. Nonetheless, there is also no restriction for them to join any trade union. This is recognized by the employer through establishment of people Policy dated 03/08/2009.</p> | Complied |
| 4.4.5.14 | <p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p>- Major compliance -</p> | <p>Based on the records in the employee's data base system, which has the information about date of birth and date join, there was no children and young person being employed.</p> | Complied |
| <p>Criterion 4.4.6: Training and competency</p> | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|---------------------|------------|------|------------------------|------------|--------------------------------|------------|-------------------------------------|------------|------------------------------------|------------|---|------------|---|------------|--|------------|-------------------------|------------|----------------|------------|-------------------------------|------------|---|------------|--|------------|--|------------|---------------------|------------|----------------|------------|-----------------------------------|------------|---|------------|-----------------|
| <p>4.4.6.1</p> <p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p>- Major compliance -</p> | <p>Training matrix and training programme had been established by the management. Among the trainings given by the mill are generally covering the aspects of OSH, environment, and best practices. E.g. of training records verified are as follows:</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Fire Fighting Training</td> <td>28/04/2022</td> </tr> <tr> <td>Spillage CPO Response Training</td> <td>16/04/2022</td> </tr> <tr> <td>Spillage Chemical Response Training</td> <td>16/04/2022</td> </tr> <tr> <td>Spillage Compost Response Training</td> <td>16/04/2022</td> </tr> <tr> <td>Emergency Equipment & Action – Spillage – Water Treatment</td> <td>03/06/2022</td> </tr> <tr> <td>Emergency Equipment & Action – Spillage – Compost plant</td> <td>13/06/2022</td> </tr> <tr> <td>Emergency Equipment & Action – Spillage – Laboratory</td> <td>10/06/2022</td> </tr> <tr> <td>Compost Plant Operation</td> <td>14/05/2022</td> </tr> <tr> <td>Permit To Work</td> <td>06/04/2022</td> </tr> <tr> <td>HIRARC, SOP, EAI, ECP - Store</td> <td>05/03/2022</td> </tr> <tr> <td>HIRARC, SOP, EAI, ECP – Boiler, Engine Room</td> <td>12/03/2022</td> </tr> <tr> <td>HIRARC, SOP, EAI, ECP – Store - Workshop</td> <td>12/03/2022</td> </tr> <tr> <td>HIRARC, SOP, EAI, ECP – Store - Laboratory</td> <td>01/04/2022</td> </tr> <tr> <td>Chemical management</td> <td>07/08/2021</td> </tr> <tr> <td>PPE Management</td> <td>07/07/2021</td> </tr> <tr> <td>First Aiders – Emergency Response</td> <td>17/12/2021</td> </tr> <tr> <td>HIRARC, SOP, EAI, ECP – Fruit Reception, Sterilizer, Thresher, Press, Kernel Plant, Oil Room and EFB Shredder</td> <td>17/03/2022</td> </tr> </tbody> </table> | | Training | Date | Fire Fighting Training | 28/04/2022 | Spillage CPO Response Training | 16/04/2022 | Spillage Chemical Response Training | 16/04/2022 | Spillage Compost Response Training | 16/04/2022 | Emergency Equipment & Action – Spillage – Water Treatment | 03/06/2022 | Emergency Equipment & Action – Spillage – Compost plant | 13/06/2022 | Emergency Equipment & Action – Spillage – Laboratory | 10/06/2022 | Compost Plant Operation | 14/05/2022 | Permit To Work | 06/04/2022 | HIRARC, SOP, EAI, ECP - Store | 05/03/2022 | HIRARC, SOP, EAI, ECP – Boiler, Engine Room | 12/03/2022 | HIRARC, SOP, EAI, ECP – Store - Workshop | 12/03/2022 | HIRARC, SOP, EAI, ECP – Store - Laboratory | 01/04/2022 | Chemical management | 07/08/2021 | PPE Management | 07/07/2021 | First Aiders – Emergency Response | 17/12/2021 | HIRARC, SOP, EAI, ECP – Fruit Reception, Sterilizer, Thresher, Press, Kernel Plant, Oil Room and EFB Shredder | 17/03/2022 | <p>Complied</p> |
| Training | Date | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Fire Fighting Training | 28/04/2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Spillage CPO Response Training | 16/04/2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Spillage Chemical Response Training | 16/04/2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Spillage Compost Response Training | 16/04/2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Emergency Equipment & Action – Spillage – Water Treatment | 03/06/2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Emergency Equipment & Action – Spillage – Compost plant | 13/06/2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Emergency Equipment & Action – Spillage – Laboratory | 10/06/2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Compost Plant Operation | 14/05/2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Permit To Work | 06/04/2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| HIRARC, SOP, EAI, ECP - Store | 05/03/2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| HIRARC, SOP, EAI, ECP – Boiler, Engine Room | 12/03/2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| HIRARC, SOP, EAI, ECP – Store - Workshop | 12/03/2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| HIRARC, SOP, EAI, ECP – Store - Laboratory | 01/04/2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Chemical management | 07/08/2021 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PPE Management | 07/07/2021 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| First Aiders – Emergency Response | 17/12/2021 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| HIRARC, SOP, EAI, ECP – Fruit Reception, Sterilizer, Thresher, Press, Kernel Plant, Oil Room and EFB Shredder | 17/03/2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|----------------------|
| 4.4.6.2 | <p>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.</p> <p>- Major compliance -</p> | <p>Training needs was established by the management, which was prepared by the mill manager on 23/05/2022 with reference Doc No: PM-MGR-05-F02-0. It has the information about types of training and targeted audience. Training Need Analysis awareness training conducted on 27/01/2022.</p> | Complied |
| 4.4.6.3 | <p>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.</p> <p>- Minor compliance -</p> | <p>A training programme has been developed and available in the Annual Sustainability Programme 2022. The trainings were sighted to have been sub categorised to trainings on Environmental, GAP, SOP, Social and OSH.</p> | Complied |
| 4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services | | | |
| Criterion 4.5.1: Environmental Management Plan | | | |
| 4.5.1.1 | <p>An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p>- Major compliance -</p> | <p>Environmental Policy had been established, signed by the Chief Operating Officer on 05/10/2009. The policy published publicly via company's website link as following: https://www.gentingplantations.com//wp-content/uploads/2022/05/GENP-Environmental-Policy.pdf</p> <p>In GJOM, the policy was communicated to the employees through various methods such as training, weekly assembly, and display on notice boards to name a few. Latest policy briefing among workers was conducted weekly morning assembly dated on 6/6/2022 and briefing to the external stakeholders was conducted during the stakeholder meeting on 14/05/2022.</p> | Major Non-Conformity |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|---|------------|
| | | <p>However, it was found that the evidence of implementation on compliance to legal requirements for following:</p> <ol style="list-style-type: none"> 1. There was no Written Notification made to Department of Environment under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 for one unit of Fume Cupboard located in Laboratory of Genting Jambongan POM. 2. Genting Jambongan POM has not appointed any Competent Person for Scheduled Waste Management (CepSWAM) as required by License No. 005264, valid from 01/07/21-30/06/22. 3. Environmental Audit as required by License No. 005264 valid from 01/07/21-30/06/22 (No. 21. To be conducted 2 times a year). Currently only conducted once conducted as Environmental Audit Report dated 21/04/22. <p>These indicated that the environmental management plan in line with the relevant environmental laws established, was ineffectively implemented. Hence, a Major NC has been raised on the matter.</p> | |
| 4.5.1.2 | <p>The environmental management plan shall cover the following:</p> <ol style="list-style-type: none"> a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations <p>- Major compliance -</p> | <p>Based on the Environmental Policy established, Genting Oil Mills (Sabah) Sdn Bhd has spelt out objectives as following:</p> <ul style="list-style-type: none"> • Comply with all applicable laws and other regulations pertaining to the Environment • Adopt suitable pollution prevention measures that will enhance the current practices towards sustainable development • Set realistic goals and monitor progress to ensure continual improvement in environmental performance • Ensure that company’s stakeholders are aware of and share our commitment to responsible environmental stewardship. | Complied |

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|--|------------|
| | <p>The aspect and impact analysis of GJOM operations was latest reviewed in January 2022. In the comprehensive report, the analysis spelt out the target as following:</p> <ul style="list-style-type: none"> • Plan to avoid negative impact and to promote positive impacts • Reduction disposal of waste taking into consideration of social responsibilities • Plan to reduce pollution and release of GHG • Development and implementations <p>The aspect and impact covered the following GJOM activities/operations among others as following:</p> <ul style="list-style-type: none"> • FFB reception • Sterilizer • Threshing • Digestion & pressing • Clarification • Laboratory • Workshop • Boiler & power plant • Effluent treatment and composting plant <p>The management plan includes the environmental performance of air emission, wastewater discharge and solid waste including SW generation. Identified control or mitigation measures were established to mitigate the identified environmental aspects and its impacts with hierarchy of elimination, substitution, engineering control and administrative control.</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|---|------------|
| 4.5.1.3 | <p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p>- Major compliance -</p> | <p>GJOM has established an environmental improvement plan to mitigate the identified environmental aspects and its impacts with hierarchy of elimination, substitution, engineering control and administrative control. Among established Environmental Continual Improvement Plan are as following:</p> <ul style="list-style-type: none"> • Optimized consumption of biomass waste among mesocarp fibres and dry shell for boiler that reduce use of fossil fuel • Operation and maintenance of POME treatment system with regular maintenance and monitoring of quality for compost plant discharge • Monitoring of the water usage for mill operation on daily basis • Operation and maintenance of chimney for boiler system with regular maintenance and monitoring of quality for stack emission • Management of SW as per legal requirements | Complied |
| 4.5.1.4 | <p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p> | <p>Based on the established Environmental Continual Improvement Plan, actions and monitoring are taken as per sample as following:</p> <ul style="list-style-type: none"> • Daily monitoring of biomass waste consumption as boiler fuel • Daily monitoring of compost pit to ensure zero discharge to river • Monthly monitoring of quality for river water as per latest analysis of sample by Dynakey Laboratories Sdn. Bhd.; Certificate of Analysis # W211111/02B; Date: 2/12/2021 • Water volume for mill operation and domestic records latest at 38,016 litres for period from Jan – May 2022 <p>Water volume monitoring is to ensure the consumption meet targeted <1.5 lt/mt FFB processed by GJOM. So far, the average achievement as of May 2022 was 1.29 lt/mt FFB processed.</p> | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | |
|--|--|--|------------|------|--------------------------------|------------|-------------------------------------|------------|---|------------|---|------------|--|------------|----------|
| 4.5.1.5 | <p>An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives.</p> <p>- Major compliance -</p> | <p>Other than environmental policy awareness briefing among workers conducted during weekly morning assembly dated on 6/6/2022 and briefing to the external stakeholders conducted during the stakeholder meeting on 14/05/2022, other environmental awareness and training programs were incorporated in operational trainings developed on annual basis as per latest 2022 programs as per sample as following:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Training</th> <th style="text-align: left;">Date</th> </tr> </thead> <tbody> <tr> <td>CPO Spillage Response Training</td> <td>16/04/2022</td> </tr> <tr> <td>Chemical Spillage Response Training</td> <td>16/04/2022</td> </tr> <tr> <td>Emergency Equipment & Action – Spillage – Water Treatment</td> <td>03/06/2022</td> </tr> <tr> <td>Emergency Equipment & Action – Spillage – Compost plant</td> <td>13/06/2022</td> </tr> <tr> <td>Emergency Equipment & Action – Spillage – Laboratory</td> <td>10/06/2022</td> </tr> </tbody> </table> <p>Based on interview with sample mill workers, the environmental awareness among them considered sufficiently instilled by the management.</p> | Training | Date | CPO Spillage Response Training | 16/04/2022 | Chemical Spillage Response Training | 16/04/2022 | Emergency Equipment & Action – Spillage – Water Treatment | 03/06/2022 | Emergency Equipment & Action – Spillage – Compost plant | 13/06/2022 | Emergency Equipment & Action – Spillage – Laboratory | 10/06/2022 | Complied |
| Training | Date | | | | | | | | | | | | | | |
| CPO Spillage Response Training | 16/04/2022 | | | | | | | | | | | | | | |
| Chemical Spillage Response Training | 16/04/2022 | | | | | | | | | | | | | | |
| Emergency Equipment & Action – Spillage – Water Treatment | 03/06/2022 | | | | | | | | | | | | | | |
| Emergency Equipment & Action – Spillage – Compost plant | 13/06/2022 | | | | | | | | | | | | | | |
| Emergency Equipment & Action – Spillage – Laboratory | 10/06/2022 | | | | | | | | | | | | | | |
| 4.5.1.6 | <p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p>- Major compliance -</p> | <p>Regular meetings between the management and workers mainly done during weekly morning assembly to discuss any issue related to mill operations including environmental issue. Specific environmental issues were discuss during quarterly GJOM Environmental Committee Meeting which was latest conducted on 23/04/2022.</p> | Complied | | | | | | | | | | | | |
| Criterion 4.5.2: Efficiency of energy use and use of renewable energy | | | | | | | | | | | | | | | |
| 4.5.2.1 | <p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall</p> | <p>Optimization of non-renewable energy mainly implemented through efficient operation of plant and domestic electricity consumption in</p> | Complied | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|--|------------|
| | <p>be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period</p> <p>- Major compliance -</p> | <p>absence of supply from state authority. Main source of non-renewable energy i.e. diesel was monitored its consumption and compared with FFB processed with latest results as following:</p> <ul style="list-style-type: none"> • GJOM 2021 average diesel consumption: 4.39 lt/mt FFB • GJOM 2022 to date (May) diesel consumption: 3.99 lt/mt FFB | |
| 4.5.2.2 | <p>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.</p> <p>- Major compliance -</p> | <p>The estimation of direct usage of non-renewable energy for GJOM operations, including fossil fuel to determine energy efficiency for the mill operations was available in the mill annual budget.</p> | Complied |
| 4.5.2.3 | <p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p> | <p>GJOM ensured the uptime of the mill to be at its highest and avoid downtime for optimized use of renewable energy from the source of biomass wastes among mesocarp fibres and dry shells. The biomass wastes used as boiler fuels for steam generation will ensured renewable energy generation through steam turbine. GJOM look forward to the potential application of biogas as renewable energy source in the future.</p> | Complied |
| Criterion 4.5.3: Waste management and disposal | | | |
| 4.5.3.1 | <p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p> | <p>Identification of waste products and sources of pollution is documented in GJOM Waste Management Plan. Identified wastes were categorised to scheduled wastes, domestic wastes and recyclable wastes. The wastes management plan has the information about method of disposal, monitoring & action plan, data required, responsible person and status of implementation.</p> | Complied |

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|---|--|---|------------|
| 4.5.3.2 | <p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p>- Major compliance -</p> | <p>Based on GJOM Waste Management Plan; Update: 20/4/2022 the management of identified wastes are as following:</p> <ul style="list-style-type: none"> • Scheduled waste Disposal as by DOE approved contractor • Domestic waste: Disposal in designated landfill area • Recyclable waste: Segregation and store at designated area <p>It was observed that due to the locality of GJOM in Genting Jambongan Island which requires boat transfer and barge for bulk transport, the waste mainly recyclable waste are reused such as lubricants drum for waste oil storage, used tyres and some plastic bottles for house decorations etc..</p> | Complied |
| 4.5.3.3 | <p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p>- Major compliance -</p> | <p>The SOP established as the procedure for Scheduled Waste Management; SMP-GPB-11, Rev. 02; Dated 11/08/2020. Scheduled Waste (SW) were stored for maximum 180 days in proper SW Store with labelling as per legal requirements. SW were disposed every 6 months through DOE approved SW collector as per sample disposal consignment notes (CN) as following:</p> <ul style="list-style-type: none"> • CN # B016164; Date: 14/5/2022 for SW102 by Lagenda Bumimas • CN # B016164; Date: 14/5/2022 for SW410 by Lagenda Bumimas | Complied |
| 4.5.3.4 | <p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p>- Minor compliance -</p> | <p>Due to the locality of GJOM in Genting Jambongan Island which requires boat transfer and barge for bulk transport, domestic waste mainly recyclable waste is reused such as plastic bottles for house decorations etc. Only organic wastes are being disposed through landfill to avoid contamination of the environment and watercourse.</p> | Complied |
| Criterion 4.5.4: Reduction of pollution and emission | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|--|------------|
| 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. - Major compliance - | All polluting activities were identified through the environmental aspect and impact evaluation register which includes all the mill's activities such as FFB reception, sterilizer, threshing, digestion & pressing, clarification, laboratory, workshop, boiler & power plant, and effluent treatment plant. The register was last reviewed in January 2022. | Complied |
| 4.5.4.2 | An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance - | The management plan includes the environmental performance monitoring of air emission, water discharge from estate operations, line-site and landfill area, soil erosion and greenhouse gas emissions. Identified control or mitigation measures were established to mitigate the identified environmental aspects and its impacts. The action plan includes the environmental performance monitoring of air emission, wastewater discharge and solid waste including SW generation. Identified control or mitigation measures were established to mitigate the identified environmental aspects and its impacts with hierarchy of elimination, substitution, engineering control and administrative control. | Complied |
| 4.5.4.3 | Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations. - Major compliance - | BOD of effluent is not regulated for Genting Jambongan Oil Mill. The mill is practicing zero discharge with conditions stipulated in its DOE license. Mill effluent is processed with EFB in a plant to produce compost where eventually applied in the field as fertiliser. | Complied |
| 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 | GJOM has established the Water Management Plan Genting Jambongan Oil Mill; Date prepared: May 2022; Rev. 09 mainly with | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | |
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| | <p>(surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> 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 (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p> | <p>objectives to maintain the quality and availability of natural water resources. Based on the plan actions and monitoring are taken as following:</p> <ul style="list-style-type: none"> a. River water as main source for operational with treatment for domestic consumption. Water volume for mill operation and domestic records latest at 38,016 litres for period from Jan – May 2022 b. Water volume monitoring is to ensure the consumption meet targeted <1.5 lt/mt FFB processed by GJOM. So far, the average achievement as of May 2022 was 1.29 lt/mt FFB. c. Placement of tank at the strategic area of mill building for rainwater collection use for cleaning | | | | | | | | | | |
| 4.5.5.2 | <p>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.</p> <p>- Major compliance -</p> | <p>Not applicable as the mill does not discharge its POME into water course.</p> | N/A | | | | | | | | | |
| 4.6 Principle 6: Best Practices | | | | | | | | | | | | |
| Criterion 4.6.1: Mill Management | | | | | | | | | | | | |
| 4.6.1.1 | <p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p> | <p>Standard Operating procedure has been addressed in the Sustainability Management Procedure Manual Update June 2022, Standard Operating Procedures (SOP) for GJOM. The manual covering the 51 activities in the Oil Mill. Sample of SOP as below:</p> <table border="1"> <thead> <tr> <th>SOP</th> <th>Reference No.</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Working at Height</td> <td>GJOM-SOP-MGR-03</td> <td>01/05/2014</td> </tr> <tr> <td>Weighbridge</td> <td>GJOM-SOP-PRD-01</td> <td>01/05/2014</td> </tr> </tbody> </table> | SOP | Reference No. | Date | Working at Height | GJOM-SOP-MGR-03 | 01/05/2014 | Weighbridge | GJOM-SOP-PRD-01 | 01/05/2014 | Major Non-Conformity |
| SOP | Reference No. | Date | | | | | | | | | | |
| Working at Height | GJOM-SOP-MGR-03 | 01/05/2014 | | | | | | | | | | |
| Weighbridge | GJOM-SOP-PRD-01 | 01/05/2014 | | | | | | | | | | |

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| Criterion / Indicator | | Assessment Findings | | | Compliance |
|-----------------------|--|--|-----------------|------------|------------|
| | | Loading Ramp | GJOM-SOP-PRD-03 | 22/01/2015 | |
| | | Steriliser | GJOM-SOP-PRD-05 | 01/05/2014 | |
| | | Press-Digester | GJOM-SOP-PRD-08 | 01/05/2014 | |
| | | Water Treatment Plant | GJOM-SOP-LAB-05 | 01/05/2014 | |
| | | Compost Plant | GJOM-SOP-LAB-06 | 01/05/2014 | |
| | | Workshop | GJOM-SOP-MNT-03 | 25/10/2016 | |
| | | Heavy Vehicle | GJOM-SOP-MNT-14 | 17/04/2017 | |
| | | <p>All the activities have been described comprehensively in the Standard operating procedure (SOP) and pictorial SOP. The Mill implemented the SOPs through its daily operations through verification from the site visit.</p> <p>Major NC</p> <p>Standard Operating Procedures at Diesel Tank and Workshop were not effectively implemented.</p> <p>Diesel were stored in the drinking water bottle. During site visit at Diesel Tank, it was found 1 unit of empty drinking water bottle were stored with diesel oil. It was not in line with SOP Handling On Chemicals and Oils with reference No: GJOM-SOP-STO-02 dated 01/05/2014 Section 3.6 "Gunakan Bekas yang sesuai yang dilabel di gunakan jika hendak megambil bahan kimia/minyak"</p> <p>During site visit at workshop area, it was found flash back arrestor was install only for Acetylene but not at Oxy gas tank. It was against SOP Kerja Penggunaan Oxy – Acetylene with reference No: GJOM-SOP-MNT-03 dated 25/10/2016 Section 2.2 (e) Pastikan "Flash Back Arrestor telah dipasang dan ianya berfungsi dengan baik".</p> | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|--|------------|
| 4.6.1.2 | All palm oil mills shall implement best practices. - Major compliance - | The monitoring of the mill best practices is done through supervision headed by An Engineer/Executives. All process parameters are documented and summarized in a daily report. Periodically, monitoring conducted by SVP and the mill management team is also practiced. | Complied |
| Criterion 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 - | Annual business plan is addressed in the form of annual budget and the projection for 5 years (2022-2026). It has the information about projected FFB received, CPO & PK production, finance allocations for processing, administration, maintenance, and capital expenditure. | Complied |
| Criterion 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 - | Pricing mechanisms for the products and other services were clearly written in the contract and purchase order. For CPO and PK transporter, fees of services are mentioned under Third Schedule under the contract agreement. For supplier, specific terms and conditions are mentioned under notes and conditions on the transport and payment documentation. For FFB suppliers, there is a policy agreement that shows the price calculation formula which is signed by the buyer and the seller. Based on the formula, among the factors taken into consideration are OER, MPOB average price (for CPO & PK), MPOB cess, Sabah's CPO sales tax and processing fees to name a few. | Complied |
| 4.6.3.2 | All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance - | Payments to the contractors were found to be fair, legal, transparent, and timely manner in accordance with the established contract agreements. So far there has been no complaints with regards to payments. Further confirmation was also obtained during stakeholders' consultation. The payments for FFB suppliers were also found to be | Complied |

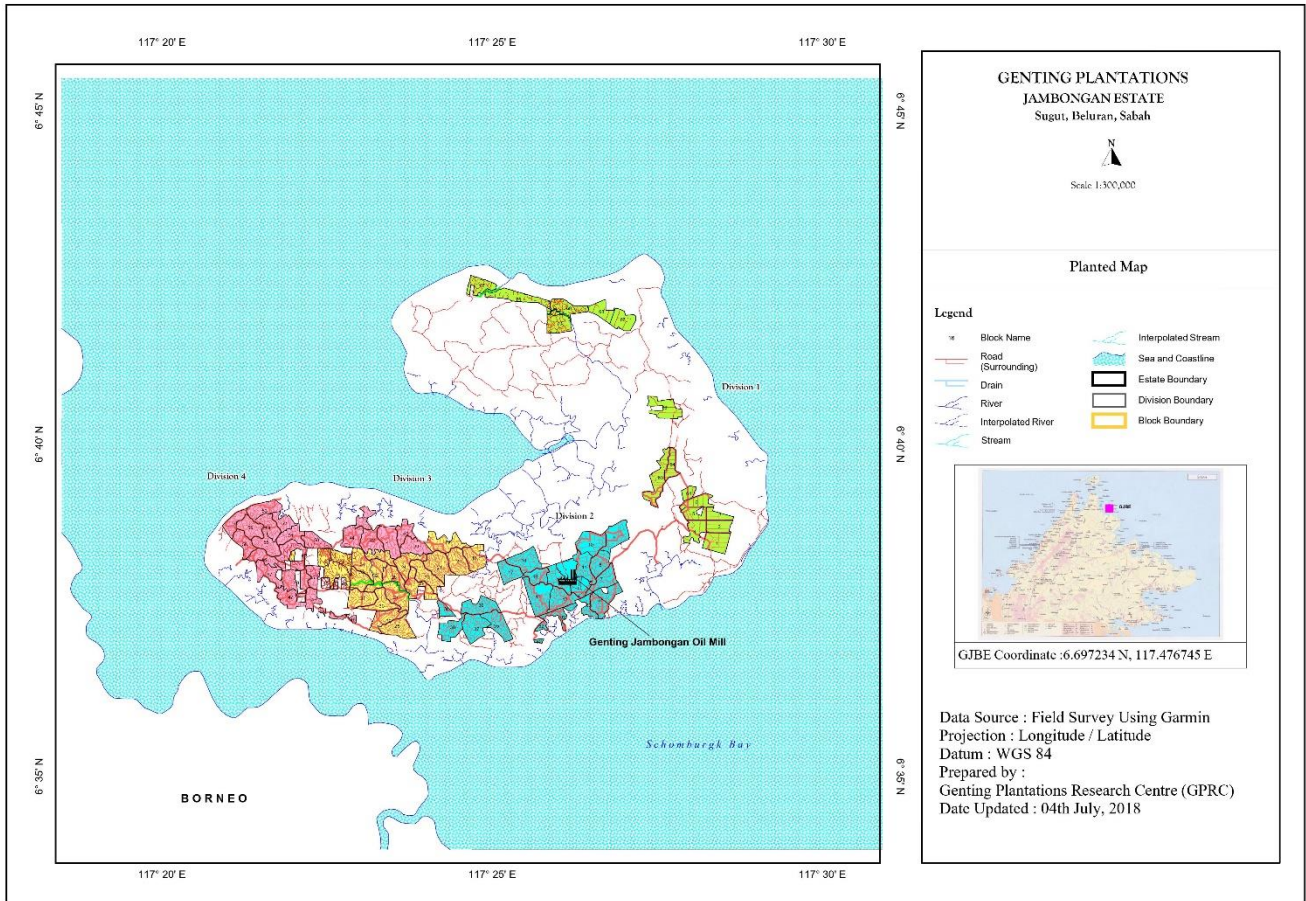
| Criterion / Indicator | | Assessment Findings | Compliance |
|------------------------------------|---|---|------------|
| | | made in timely manner i.e., not later than the 15 th day of the subsequent month. | |
| Criterion 4.6.4: Contractor | | | |
| 4.6.4.1 | In case of the engagement of contractors, they shall be made to understand the MSP0 requirements and shall provide the required documentation and information. - Major compliance - | The contractors engaged by the mill management has signed agreement prior to provide services. There were clauses where the contractors shall ensure compliance with the requirements of RSPO, ISCC, MSP0 and OSHA 1994. The contractors have been briefed on RSPO/ MSP0 management policies during stakeholder consultation and seen the training record. | Complied |
| 4.6.4.2 | The management shall provide evidence of agreed contracts with the contractor. - Major compliance - | Sampled the contract agreement/letter of award for services provider and external FFB suppliers as below: Contractor: Hai Heng Enterprise Sdn Bhd for CPO & PK transport which valid until 30/04/2025. | Complied |
| 4.6.4.3 | The management shall accept MSP0 approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance - | Genting Jambongan Oil Mill certification unit has no objection to allow BSI auditors to verify the assessment through physical inspection if required. Clause 38 (e) of the agreement above has clearly mentioned that the transporter shall ensure to provide cooperation and relevant access to the appointed CB into their respective operations, systems and any all information, when this is announced in advance. The contractor has acknowledged on the addendum. | Complied |

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Appendix B: Smallholder Member Details

| No. | Smallholder | | Location of Planted Area (District) | GPS Coordinates | | Certified Area (ha) | Planted Area (ha) |
|-----|-------------|---------------------|-------------------------------------|-----------------|-----------|---------------------|-------------------|
| | Name | MPOB License Number | | Latitude | Longitude | | |
| | N/A | | | | | | |
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Appendix C: Location and Field Map



Appendix D: 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 |
| GJBE | Genting Jambongan Estate |
| GHG | Greenhouse Gas |
| GJOM | Genting Jambongan Oil Mill |
| 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 |