

MALAYSIAN SUSTAINABLE PALM OIL MSPO OPMC Public Summary Report

☐ Initial Assessment

☑ Annual Surveillance Assessment (4)

☐ Recertification Assessment (Choose an item.)

☐ Extension of Scope

FGV HOLDINGS BERHAD

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

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

Date of Final Report: 01/04/2023

Report prepared by: Ahmad Rufi Bin Abu Talib Khan (Lead Auditor)

Report Number: 3511533

Assessment Conducted by:

BSI Services Malaysia Sdn Bhd, (DSM Accreditation Number: MSPO 09112018 CB 12) Suite 29.01 Level 29 The Gardens North Tower, Mid Valley City Lingkaran Syed Putra, 59200 Kuala Lumpur, Malaysia Tel +60392129638 Fax +60392129639 www.bsigroup.com



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Section 1: Executive Summary

| 1.1 Organizational Information and Contact Person | | | | | |
|---|--|------------|----------|--------------------|--|
| Company Name | FGV Holdings Berhad | | | | |
| Mill/Estate | Certification Unit | MPOB Lice | nse No. | Expiry Date | |
| | FGVPISB Belitong Palm Oil Mill | 5001709040 | 000 | 31/03/2023 | |
| | FGVPM Bukit Tongkat B Estate 558895002000 28/02/2023 | | | 28/02/2023 | |
| | FGVASSB Ulu Belitong Estate | 5035409020 | 000 | 31/08/2023 | |
| Address | Plantation Sustainability Department, Level 20 (W), Wisma FGV, Jalan Raja Laut, 50350 Kuala Lumpur, Malaysia | | | | |
| Management Representative | Mr Ameer Izyanif Bin Hamzah | | | | |
| Website | www.feldaglobal.com E-mail ameer.h@fgvholdings.com | | | | |
| Telephone | +603-2789 1338 | Facsimile | +603-278 | 39 0001 | |

| 1.2 Certification Informa | ntion | | | | |
|---|---|--|--|--|--|
| Certificate Number | Mill: MSPO 693232 Estate: MSPO 693234 | ļ | Certificate Start Date | 21/05/2019 | |
| Date of First Certification | 21/05/2019 | | Certificate Expiry Date | 20/05/2024 | |
| Scope of Certification | | | nable Palm Oil and Palm Oil I stainable Oil Palm Fruits | Products | |
| Visit Objectives | Assessment - ASA 4 a scope of certification effectively addressed system is demonstrategulatory and conobjectives, as application and to confirm the on | and loon and loom and loom the loom and | sessment was to conduct ok for positive evidence to ensitive requirements of the mane organisation's management he ability to support the adal requirements and the thregard to the scope of the achievement and applicability to identify potential areas | sure that elements of the anagement standard are ent system and that the chievement of statutory, organisation's specified a management standard, y of the forward strategic | |
| Standard | ☐ MSPO MS 2530-2: | 2013 - | – General Principles for Indep | pendent Smallholders | |
| | | | | | |
| | | | | | |
| Stage 1 Date | | | 04-05/06/2018 | | |
| Stage 2 / Initial Assessment Visit Date (IAV) | | | 16-18/10/2018 | | |
| Continuous Assessment Vis | it Date (CAV) 1 | 12-15/11/2019 | | | |
| Continuous Assessment Vis | it Date (CAV) 2 | 15-17 | 7/12/2020 | | |



| Continuous Assessment Visit Date (CAV) 3 | 23-25/11/2021 |
|--|---------------|
| Continuous Assessment Visit Date (CAV) 4 | 07-11/11/2022 |

| 1.3 Other Certifications | | | | | | | | |
|--------------------------|--|---|--------------------|--|--|--|--|--|
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date | | | | | |
| RSPO 693230 | RSPO Principles & Criteria of Sustainable Palm Oil Production: 2018; Malaysian National Interpretation:2019 | BSI Services Malaysia Sdn Bhd | 06/02/2024 | | | | | |
| MSPO-SCCS-TCI-026-2020 | Malaysian Sustainable Palm Oil Supply Chain Certification Standard (MSPO SCCS-01) (November 2018) | Trans Certification International (TCI) | 26/03/2025 | | | | | |

| 1.4 Location of Certification Unit | | | | | | |
|---|--|----------------------------------|-------------------|--|--|--|
| Name of the Certification Unit (Palm Oil Mill/ Estate/ | | GPS Reference of the site office | | | | |
| Smallholder/ Independent Smallholder) | Site Address | Latitude | Longitude | | | |
| FGVPISB Belitong Palm Oil Mill | Kilang Kelapa Sawit Belitong, KM 28, Jalan Kluang/Kota Tinggi, 86000 Kluang, Johor, Malaysia | 1° 56′ 18.00″ N | 103° 29′ 55.00″ E | | | |
| FGVPM Bukit Tongkat B Estate | Ladang FGVPM Bukit Tongkat B, 86000 Kluang, Johor, Malaysia | 1° 56′ 29.00″ N | 103° 30′ 14.00″ E | | | |
| FGVASSB Ulu Belitong Estate | Stesen FASSB Ulu Belitong, 86000 Kluang, Johor, Malaysia | 1° 56′ 22.00″ N | 103° 28′ 39.00″ E | | | |

| 1.5 Certified Area | | | | | | | |
|------------------------------|---|-------------|-----------------------------------|--------------------|--------------|--|--|
| Estate | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted | | |
| FGVPM Bukit Tongkat B Estate | 970.25 | 0.00 | 284.55 | 1,254.80 | 77.32 | | |
| FGVASSB Ulu Belitong Estate | 127.37 | 0.00 | 20.33 | 147.70 | 86.24 | | |
| Total (ha) | 1,097.62 | 0.00 | 304.88 | 1,402.50 | | | |

Notes:

1. Increase of 16.95 ha from 267.60 ha to 284.55 ha in the Infrastructure & Other hectarage at FGVPM Bukit Tongkat B Estate, due to new land survey conducted at the estate in the month of June 2022.



| 1.6 Plantings & Cycle | | | | | | | |
|---------------------------------|-------------|--------|---------|---------|---------|----------|----------|
| Estato | Age (Years) | | | | M-1 | | |
| Estate | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 | Mature | Immature |
| FGVPM Bukit Tongkat B Estate | 0.00 | 334.98 | 519.46 | 0.00 | 115.81 | 970.25 | 0.00 |
| FGVASSB Ulu Belitong Estate | 0.00 | 0.00 | 127.37 | 0.00 | 0.00 | 127.37 | 0.00 |
| Total (ha) | 0.00 | 334.98 | 646.83 | 0.00 | 115.81 | 1,097.62 | 0.00 |

| 1.7 Certified Tonnage of FFB | | | | | | | |
|------------------------------|---------------------------------|---------------------------------|-----------------------------------|--|--|--|--|
| | Tonnage / year | | | | | | |
| Estate | Estimated (May 2022 - Apr 2023) | Actual (Nov 2021 - Oct 2022) | Forecast (May 2023 - Apr 2024) | | | | |
| FGVPM Bukit Tongkat B | 15,300.24 | 2,979.75 | 15,350.00 | | | | |
| FGVASSB Ulu Belitong | 4,260.25 | 659.75 | 4,300.00 | | | | |
| Felda Ulu Belitong | 57,041.25 | 8,229.24 | 57,500.00 | | | | |
| Felda Bukit Tongkat | 29,208.14 | 4,269.31 | 29,500.00 | | | | |
| Felda Layang-Layang | 22,498.67 | 1,958.81 | 22,600.00 | | | | |
| Felda Ulu Penggeli | 35,389.00 | 6,969.32 | 35,500.00 | | | | |
| Felda Bukit permai | 27,384.00 | 4,269.31 | 27,500.00 | | | | |
| Felda Ayer Hitam | 2,547.00 | 427.75 | 2,600.00 | | | | |
| Total (mt) | 193,628.55 | 29,763.24 | 194,850.00 | | | | |

| 1.8 Uncertified Tonnage of FFB | | | | | | |
|--------------------------------|-----------|------------|------------|--|--|--|
| Tonnage / year | | | | | | |
| Estate | Estimated | | | | | |
| ОСР | 47,081.60 | 153,542.60 | 169,740.00 | | | |
| Total (mt) | 47,081.60 | 153,542.60 | 169,740.00 | | | |

| 1.9 Certified Tonnage | | | | | | | |
|-----------------------|---------------------------------|---------------------------------|-----------------------------------|--|--|--|--|
| Mill Capacity: | Estimated (May 2022 - Apr 2023) | Actual (Nov 2021 - Oct 2022) | Forecast (May 2023 - Apr 2024) | | | | |
| 54 MT/hr | FFB | FFB | FFB | | | | |
| 666 M 1 1 | 193,628.55 | 29,763.24 | 194,850.00 | | | | |
| SCC Model: | CPO (OER: 20.50%) | CPO (OER: 18.06%) | CPO (OER: 19.00%) | | | | |
| 1-10 | 39,693.85 | 5,375.24 | 37,021.50 | | | | |



| PK (KER: 5.30%) | PK (KER: 4.64%) | PK (KER: 5.00%) |
|-----------------|-----------------|-----------------|
| 10,262.31 | 1,381.01 | 9,742.50 |

| 1.10 Actual Sold Volume (CPO) | | | | | | | | |
|-------------------------------|----------------|--|----------|--------------|----------|--|--|--|
| CDO (mt) | MSPO Certified | tified Other Schemes Certified ISCC RSPO | | Conventional | Total | | | |
| CPO (mt) | MSPO Certified | | | Conventional | | | | |
| 5,375.24 | 0.00 | 0.00 | 1,108.02 | 3,029.48 | 4,137.50 | | | |

| 1.11 Actual Sold Volume (PK) | | | | | | | |
|------------------------------|----------------|-------------------------|--------|--------------|--------|--|--|
| DV (mt) | MSPO Certified | Other Schemes Certified | | Conventional | Total | | |
| PK (mt) | MSPO Certified | ISCC | IOLAI | | | | |
| 1,381.01 | 0.00 | 0.00 | 770.81 | 100.68 | 871.49 | | |



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 07-11/11/2022. The audit programme is included as Section 2.4. The approach to the audit was to treat the Belitong Palm Oil Mill, Bukit Tongkat B Estate and Ulu Belitong Estate 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. 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.

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.



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

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

Tentative Date of Next Visit: November 6, 2023 - November 9, 2023

Total No. of Mandays: 11

2.1 BSI Assessment Team

| Team Member Name | Role | Qualifications | | | |
|----------------------------------|-------------|---|--|--|--|
| Ahmad Rufi Bin Abu Talib Khan | Team Leader | Education: Rachalor Dogram In Machanical Engineering from University Taknology MARA | | | |
| (ARK) | | Bachelor Degree In Mechanical Engineering from Universiti Teknologi MARA Shah Alam, graduated in 2015. | | | |
| | | Work Experience: | | | |
| | | He started his career as Assistant Mill Manager, managing the day-to-day mill operations. In his five years' experience, he has experience handling the certification of ISO 9001, OHSAS 18001, ISO 14001 as well as Malaysia Sustainable Palm Oil (MSPO). He is a qualified Lead Auditor for MS 2530:2013 and has accumulated more than 300 audit days throughout his current career as the auditor for multiple disciplines covering all over Malaysia. | | | |
| | | Training attended: | | | |
| | | He has completed CQI-IRCA approved ISO 9001, ISO 14001 and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course. | | | |
| | | Aspect covered in this audit: | | | |
| | | Policy and commitment, internal audit, management review, social compliance, environment management, HBV, waste management trainings, mill and estate best practise. | | | |
| | | Language proficiency: | | | |
| | | Fluent in English and Bahasa Malaysia. | | | |



| | T | |
|---|-------------|--|
| Yusof Khairan Nizar Bin Ahmad Tarmizi (YKN) | Team Member | Education: Diploma in Public Administration-ITM (1991), Certificate of Safety and Health Officer-MII (2003). Bachelor of Corporate Administration (Hons) UiTM (2003), Master of Science (Occupational Safety and Health) Management-UUM (2011). |
| | | Work Experience: |
| | | 17 years experiences working Japanese MNC in manufacturing silicone, rubber and plastic products and components. Registered SHO with DOSH Malaysia. 16 years experiences working as consultants, trainers and auditors with local, internationals CBs. 4 years experiences as HSE Advisors with Telco Company. Contract trainer of OSH & Environment, HSE Legal & Other Requirements, Lead Auditors course for STS & NIOSH Cert. Approved (HRDF) Trainer. Assessor for Prime Minister's Hibiscus Award. |
| | | Training attended: |
| | | Successfully attended course ISO 9001 IRCA/IATC A Lead Auditor Training IMTL (Kuala Lumpur), ISO 14001 IEMA Approved EMS Advanced Lead Auditor Training Course-Aspects Moody Certification Ltd (UK). OH&SMS IRCA Certified Lead Auditor Training Course-Moody International (KL). MS 1722 Lead Auditor Training NIOSH Cert. (KL), MSPO Auditing — SGS (Malaysia). RSPO P&C 2018 Refresher Lead Auditor Course — Checkmark Training. Also attended the Quality & Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment — For Bodied Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality Malaysia, ISO/IEC 17021. MSPO Peer Reviewer Training (MPOCC). HCV-HCS Integrated Concept & Brief Method and Social Knowledge for Assessing High Carbon Stock (Aiknow) and PT Remark Asia, SMETA Audit Training-BSI, Registered Environmental Audit Training (IEMAS). Capacity Development for MSPO MS 2530:2022 (Part 1-4) & Scheme Documents Workshop-MPOCC. |
| | | Aspect covered in this audit: |
| | | Traceability, legal requirement, occupational, health & safety, best practises, and supply chain requirements. |
| | | Language proficiency: |
| | | Fluent in English and Bahasa Malaysia. |

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 |
|-----|------|------|
| | NA | |



2.4 Assessment Plan

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

| Date | Time | Subjects | | YKN |
|---|--|---|----------|----------|
| Sunday, 6/11/2022 | | Audit team travel to Kluang | √ | √ |
| Monday, 7/11/2022 Audit team travel to Ulu Belitong Estate Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit (including stakeholder's consultation). State Audit team travel to Ulu Belitong Estate Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit (including stakeholder's consultation). Verification on previous audit findings | | | √ | √ |
| | 0930 - 1230 | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, worker housing, clinic, Landfill, etc. | √ | √ |
| | 1230 - 1330 | Lunch | √ | √ |
| | 1330 - 1700 | Document Review (MS 2530:2013 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, P6: Best practices, P7: Development of New Planting | √ | √ |
| | 1700 - 1730 | Interim closing meeting | √ | √ |
| Tuesday, 8/11/2022 Ulu Belitong Estate – ½ day | /2022 1230 commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity, and ecosystem services, P6: Best | | √ | √ |
| Belitong Palm | 1230 - 1330 | Lunch and travel to Belitong Palm Oil Mill | √ | √ |
| Oil Mill – ½ day | 1330 - 1700 | Document review (MS 2530:2013 Part 4): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices | √ | √ |
| | 1700 - 1730 | Interim closing meeting | √ | √ |



| Date | Time | Subjects | ARK | YKN |
|--|---|---|----------|-----|
| Wednesday 9/11/2022, Belitong Palm Oil Mill | Wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc. | | √ | √ |
| | 1000 - 1100 | Stakeholder Consultation | √ | |
| | 1230 - 1330 | Lunch | √ | √ |
| | 1330 - 1700 | Document review (MS 2530:2013 Part 4): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices | √ | √ |
| | 1700 - 1730 | Interim closing meeting | √ | √ |
| Thursday, 10/11/2022 Bukit Tongkat B Estate | 0900 - 1030 | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, worker housing, clinic, Landfill, etc. | | √ |
| D Estate | 1030 - 1230 | Document Review (MS 2530:2013 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, P6: Best practices, P7: Development of New Planting | √ | √ |
| | 1230 - 1330 | Lunch | √ | √ |
| | 1330 - 1700 | Document Review (MS 2530:2013 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, P6: Best practices, P7: Development of New Planting | √ | √ |
| | 1700 - 1730 | Interim Closing Meeting | √ | √ |
| Friday, 11/11/2022 | 0900 - 1230 | Document Review (MS 2530:2013 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 | √ | √ |



| Date | Time | Subjects | ARK | YKN |
|---------------------------|---|---|-----|-----|
| Bukit Tongkat B Estate | | resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting | | |
| | 1230 - 1330 | Lunch | √ | √ |
| | Document Review (MS 2530:2013 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, P6: Best practices, P7: Development of New Planting | | √ | √ |
| | 1530 - 1600 | Interim Closing Meeting | √ | √ |
| | 1600 - 1630 | Auditor Discussion | √ | √ |
| | 1630 - 1700 | Closing Meeting | √ | √ |



Section 3: Assessment Findings

3.1 Details of audit results

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

- ☐ MSPO MS 2530-2:2013 General Principles for Independent Smallholders
- ☑ MSPO MS 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders

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 & one (1) Minor nonconformities and zero (0) OFI raised. The Belitong Palm Oil Mill and Supply Base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Based on the requirements, the organization was suspended due to a failure to address the Major NC (#2273538-202211-M2) within the specified timeframe. Taking into consideration that the Major NC evidence submitted was sufficient to close on documentation review, the audit team reviewed all the evidence submitted on 06/3/2023, and the Major NC was satisfactorily closed on 06/3/2023. Continuous implementation of corrective action taken will be further verified in the next assessment visit. The lifting of the suspension is approved on 01/04/2023.

| Non-Conformity Report | | | | | |
|-----------------------------|---|---------------------------------------|---|--|--|
| NCR Ref #: | 2273538-202211-M1 | Issue Date: | 11/11/2022 | | |
| Due Date: | 09/02/2023 | Date of Closure: | 09/02/2023 | | |
| Area/Process: | FGVAS Ulu Belitong Estate & FGVPM Bukit Tongkat B Estate | Clause & Category: (Major / Minor) | MSPO 2530 Part 3:4.4.4.2(d) Major | | |
| Requirements: | | perations as identified in t | at the place of work to cover he risk assessment and control Risk Control (HIRARC). | | |
| Statement of Nonconformity: | The PPE required not properly used by workers as risk control measure. | | | | |
| Objective Evidence: | FGVAS Ulu Belitong Estate During site visit at Block 18 Peringkat 3, Harvesting area it was found that 1 Mechanical Buffalo Driver was not wearing PPE required such as ear plug. It | | | | |



| | was not in line with It was not in line with Matrix Alat Perlindungan PPE FGVPM dated 03/08/2022, PPE Jentera: Topi Keselamatan, Ear Plug, Kasut Wellington (Safety). | | | |
|------------------------|--|--|--|--|
| | FGVPM Bukit Tongkat B Estate | | | |
| | • During site visit at PM 10N, it was found that 1 Tractor Driver and 1 Mechanical Buffalo Driver were not wearing proper PPE such as Safety Shoes. It was not in line with SOP: FGVPM/L3/GPK-017 dated 01/02/2020 Section 6.4.2 Perlu Memakai Kasut Keselamatan Dan Topi Keselamatan. | | | |
| | During site visit at PM 10N, harvesting area, it was found that 4 harvesters were not wearing required PPE such as Safety Goggles and Wellington Boots (Harvester were wearing high cut rubbers shoes). It was not in line with Matrix Alat Perlindungan PPE FGVPM dated 01/12/2020, PPE Menuai: Cermin Mata Keselamatan, Kasut Wellington, Cotton Gloves, Topi Keselamatan. | | | |
| Corrections: | 1. To appoint new Person In Charge for conduct cencus based on PPE matrix. | | | |
| | 2. To conduct training for new PPE matrix Person In Charge. | | | |
| | 3. To update the PPE issuance. | | | |
| | 4. Awareness to workers regarding wear PPE usage by management. | | | |
| Root cause analysis: | No supervision & no enforcement to the staff and workers on PPE usage by management due to changes new person in-charge. | | | |
| Corrective Actions: | 1) The estate management need to monitor and enforce on PPE usage based on PPE matrix, medical surveillance and first aid training. | | | |
| | 2) The management need to discuss the PPE issues. | | | |
| Assessment Conclusion: | Sighted the records of PPE training conducted on 11/01/2023 at FGVPM Bukit Tongkat B Estate. The attendance list and training material is available for verification. The management has also conducted the training for the safety committee member regarding the PPE implementation on 27/12/2022. The Major NC is closed, further verification will be conducted in the next surveillance audit. | | | |

| Non-Conformity Report | | | | | | |
|-----------------------------|---|--|------------------------------------|--|--|--|
| NCR Ref #: | 2273538-202211-M2 | Issue Date: | 11/11/2022 | | | |
| Due Date: | 09/02/2023 | Date of Closure: | 06/03/2023 | | | |
| Area/Process: | FGVPI Belitong POM | Clause & Category: (Major / Minor) | MSPO 2530 Part 4: 4.3.1.1 Major | | | |
| Requirements: | All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. | | | | | |
| Statement of Nonconformity: | The monitoring of legal requirements was not fully demonstrated. | | | | | |
| Objective Evidence: | 1) Referring to Lesen Melencong atau Mengabtrak Air (License No. 08/A/Klg/016. Validity period from 23/01/2022 - 31/12/2022) clause 6 stated that the maximum water abstraction per day is 600 m3 per day. However, sighted in the water consumption sample for the month of October 2022 there are 15 days of record which above the 600 m3. The reading is as per below: Date October Water Consumption (m³) | | | | | |



| | more than ten | feet, means shall be provided | to ensure his safety and such |
|------------------------|--|-------------------------------|-------------------------------|
| | 30 31 | 680 1010 | |
| | Referring to Safety And Health Regulation 1970, clause 12, "Where any person is required to work at a place from which he will be liable to fall a distance of more than ten feet, means shall be provided to ensure his safety and such means shall where practicable include the use of safety belts or ropes." It was sighted, that during removing of netting from the FFB lorry, the person removing the FFB netting is working on the top of trailer without any PPE as required by the regulation. Leachate from EFB stockyard was found to be flowing to the nearest monsoon drain which eventually goes to the environment through "Takungan Alur Air Hujan No. 2". There was also no roof to protect the EFB stockpile from rainwater. This is not in-line with the DOE's compliance schedule of License #006384, Clause 13, which refers to the "Garis Panduan Pelan Pengurusan Tandan Kosong Kelapa Sawit" (Guideline for Oil Palm Empty Fruit Bunch Management), Clause 4.0. | | |
| Corrections: | Mill to request to BAKAJ to up limitation water usage from 600 to 1010 m3 per day. To install visual control regarding hazard at height place at main gate to remind lorry driver. | | |
| | 3) i) Prepare a work plan for dumping site area and facilities. ii) To install pump. | | |
| Root cause analysis: | Mill management does not monitor requirement of legal due to changes on new | | |
| | person in charged. | | |
| Corrective Actions: | 1) Management to discuss regarding compliance to legal in management meeting regularly (every 6 months). | | |
| | 2) To appoint new person in-charge to monitor in legal requirement. | | |
| | 3) To conduct training to new person in charge regarding legal requirement. | | |
| | 4) To discuss in Environment meeting. | | |
| Assessment Conclusion: | Verification has been conducted that the management has submitted the application to increase the water abstraction rate to Badan Kawal Selia Air Johor (BAKAJ) on 04/12/2022. BAKAJ had approved the application on 06/03/2023. | | |



| The management has issued a memo to prevent the lorry driver from opening the canvas at the mill due to no platform of using the safety harness. Memo dated 04/01/2023. |
|--|
| The mill has planned the installation of pump at the EFB yard to pump the EFB Leachate to the mill POME facility. Sighted the planning blueprint and Gantt chart. Currently the mill already cleaned the monsoon drain, and to install the pump at the area. |
| The Major NC is closed, and the suspension is lifted. Further verification will be conducted in the next assessment. |

| Non-Conformity Report | | | | |
|-----------------------------|--|--|--|--|
| NCR Ref #: | 2273538-202211-M3 | Issue Date: | 11/11/2022 | |
| Due Date: | 09/02/2023 | Date of Closure: | 09/02/2022 | |
| Area/Process: | FGVPI Belitong POM | Clause & Category: (Major / Minor) | MSPO 2530 Part 4: 4.4.4.2(b) Major | |
| Requirements: | | safety and health plar tions shall be assessed an | n shall cover the following: ad documented. | |
| Statement of Nonconformity: | The risk control measu conducted in risk assessi | | cly implemented as assessment | |
| Objective Evidence: | FGVPI Belitong POM During site visit at Electrical Store, it was found that Oxygen and Acetylene Gas Cylinder were placed in the trolly. There is no flash back arrestor installed and the tanks were placed without chained to the trolly. It was not in line with SOP Penggunaan Oxy-Acetylene, FPI-PK-082 dated 14/05/2022 Section 6.1.5, "Pastikan Flash Back Arrester dipasang pada setiap hose" and Section 6.4.2 "Silender tersebut mesti diikat kemas pada troli", Section 6.5.5 "Selinder yang disimpan perlu diikat bagi mengelakkan selinder tumbang/ terjatuh dan menyebabkan kerosakan pada silender" respectively. During site visit at Electrical Store, it was found that Diesel was stored in the two containers without any labelled. It was not in line with SOP Pengurusan Bahan Kimia, FPI-PK-036 dated 14/05/2022, Section 6.5.1: "Bahan Kimia yang dipindahkan ke bekas lain hendaklah dilabel semula mengikut label asal bagi mengelakkan kekeliruan kepada petugas lain". | | | |
| Corrections: | Awareness to workers on company SOP regularly. To appoint person in charge to monitor implementation of SOP to workers following workstation. | | | |
| Root cause analysis: | No awareness to workers regarding SOP due to lack of conducting training to the workers. | | | |
| Corrective Actions: | To install labelling at diesel container as per SOP. To install flashback arrester, trolley and place oxy cylinder and acetylene at right place. | | | |
| Assessment Conclusion: | The management has conducted the training to workers, regarding the placement and installation of flashback arrestor. Sighted the photos of the installed flashback arrester and the placing of container with chains and locks. | | | |



| The diesel container has been labelled accordingly and kept at safe place. |
|--|
| The major NC is close, further verification will be conducted in the next audit. |

| Non-Conformity Report | | | |
|-----------------------------|--|--|------------------------------------|
| NCR Ref #: | 2273538-202211-N1 Issue Date: 11/11/2022 | | |
| Due Date: | Next Audit | Date of Closure: | Open |
| Area/Process: | FGVAS Ulu Belitong Estate & FGVPM Bukit Tongkat B Estate | Clause & Category: (Major / Minor) | MSPO 2530 Part 3: 4.5.3.5 Minor |
| Requirements: | Domestic waste should be dis of the environment and water | | mize the risk of contamination |
| Statement of Nonconformity: | Procedure of land fill manage | ment was not effective | ly implemented. |
| Objective Evidence: | Procedure: Pengurusan Sisa pepejal (FGVPM/L2/PAS-02) Rev:01, Date: 23/01/2020) Clause 6.1.1.1.1 Mestilah 500meter dari anak anak sungai, kedudukan tapak pelupusan mestilah berada dalam sekitar >500 m dari Kawasan penempatan penduduk. During the site visit to the land fill areas as the following: 1. Ulu Belitong Estate – 1.93764, 103.47327 2. Bukit Tongkat B Estate – 1.94577, 103.48104 It was verified through google earth that the location of the residential is within 500 m from both of the landfill point. | | |
| Corrections: | To conduct awareness to person in charge on opening Landfill to using variety of method (google earth and odometer) to check and balance the distance based on SOP requirement. | | |
| Root cause analysis: | The initial selection of the opening of the landfill is measured by using the odometer of the vehicle that passes through the main road and is closest to the landfill compared to using google earth. | | |
| Corrective Actions: | Measurements will be using the "AVENZA MAP" application and record. To appoint person in charge to monitor regarding landfill management. | | |
| Assessment Conclusion: | The Avenza Map has pointed the new location of the landfill which are 500 m away from the residential area. Verification of the location will be conducted in the next audit. | | |

| Opportunity For Improvement | | | | |
|-----------------------------|--------------------------|--|--|--|
| Ref: | NA Clause: MSPO Part: NA | | | |
| Area/Process: | NA | | | |
| Objective Evidence: | NA | | | |



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

3.3 Status of Nonconformities Previously Identified and OFI

| Non-Conformity Report | | | | |
|-----------------------------|---|---|------------------------------------|--|
| NCR Ref #: | 2136025-202111-M1 | Issue Date: | 25/11/2021 | |
| Due Date: | 25/02/2022 | Date of Closure: | 21/01/2022 | |
| Area/Process: | Belitong POM | Clause & Category: (Major / Minor) | MSPO 2530 Part 4: 4.4.4.2 Major | |
| Requirements: | ' | and health plan should cove ions shall be assessed and d | _ | |
| Statement of Nonconformity: | The Occupational Safety 9[9] not effectively impl | | Regulations 2019, Regulation | |
| Objective Evidence: | Audiometry Test for 2020 was conducted on 26/09/2020 by Industrial Safety Management Services and one worker, En Kamsani bin Shamsudin, I/C No 650125-01-6191, process operator was under Standard Threshold Shift. The re-test was conducted on 01/07/2021 despite a written reminder by Central Clinic dated 17/10/2020. The retest has lapsed 277 days from the date of the last audiometric test. As per Occupational Safety and Health [Noise Exposure] Regulations 2019, Regulation 9[9] stated" If the report of the audiometric testing shows that any employee has a temporary standard threshold shift, the employer shall - (a) cause a retest to be carried out by the audiometric testing centre on such employee within three months after the previous audiometric testing was carried out;" | | | |
| Corrections: | To conduct awareness to person in charge regarding compliance on medical surveillance by regional SHO To discuss in OSHA meeting | | | |
| Root cause analysis: | Management did lapses retest as reported in the medical surveillance report due to no awareness about this matter to person in charge. | | | |
| Corrective Actions: | Evidence of awareness regarding Medical Surveillance to person in charge. Minutes of meeting of OSHA discussing on Medical Surveillance. | | | |
| Assessment Conclusion: | Awareness regarding Medical surveillance (Retest of Audiometric Test) has been given to person in charge dated 22/12/2021. Sighted evidence of attendance and photos. Refer "Penerangan Pihak Bertanggungjawab Tentang Audiometric Test Retest)". Minutes of meeting dated 20/12/2021 was verified. Sighted evidence on discussion matters related medical surveillance (Audiometric Retest). Based on the above evidence, the major NC is closed effectively on 21/01/2022. | | | |
| Verification Statement: | Continuous implementation will be further verified in the next assessment. Awareness regarding Medical surveillance (Retest of Audiometric Test) has been given to person in charge dated 22/12/2021. Sighted evidence of attendance and | | | |



| photos. Refer "Penerangan Pihak Bertanggungjawab Tentang Audiometric Test |
|--|
| Retest)". |
| Minutes of meeting dated 20/12/2021 was verified. Sighted evidence on discussion |
| matters related medical surveillance (Audiometric Retest). |
| Based on the above evidence, the major NC is closed effectively on 21/01/2022. |
| Continuous implementation was further verified in this assessment and concluded |
| that the Major NC is effectively close. |

| Non-Conformity Report | | | | |
|-----------------------------|--|---------------------------------------|---|--|
| NCR Ref #: | 2136025-202111-M2 | Issue Date: | 25/11/2021 | |
| Due Date: | 25/02/2022 | Date of Closure: | 21/01/2022 | |
| Area/Process: | FGVPM Bukit Tongkat B | Clause & Category: (Major / Minor) | MSPO 2530 Part 3: 4.4.5.4 Major | |
| Requirements: | | ards according to the employ | ors are paid based on legal or ment contract agreed between | |
| Statement of Nonconformity: | The payment record fo implemented. | r Public Holiday for contrac | t workers was not effectively | |
| Objective Evidence: | Reviewed the payslips to the contractor's workers (Zaidan Joyoo Enterprise – NRIC 890117-XX-XXXX and 880822-XX-XXXX) in Bukit Tongkat B Estate on payslip August 2021 and October 2021. There is no evidence that the Public Holiday wages in the sample workers' payslip. This is reoccurrence of Major NC in the ASA 2. | | | |
| Corrections: | To appoint new person in charge to handle compliance for Employment Contracts among contractors. PIC to prepare checklist to monitor compliance regarding Employment Contracts among contractors. Management to ensure all workers in comply with employment act through monthly payroll review for each employee thru meeting with contractors every 6 months. | | | |
| Root cause analysis: | No enforcement by management in monitoring regarding compliance for Employment Contracts among contractors due to changes person in charge to monitor the issues. | | | |
| Corrective Actions: | Appointment letter for new person in charge to handle compliance for Employment Contracts among contractors. Minute of meeting with Contractors every 6 months to discuss matter related to Employment Contracts. | | | |
| Assessment Conclusion: | Appointment letter for person in charge on compliance of Employment Contracts among contractors has been made. Refer "Surat Lantikan Pegawai Pemantau Dokumen" to Mr Hasbi Mamat dated 01/01/2022. Document reference number: 601/BKTTONGKATB. | | | |
| | Meeting with contractors has been conducted on 04/01/2022. Refer minutes of meeting "Penerangan Pematuhan Kontraktor" by Mr Hadi Helmi Che Hassan. Based on the above evidence, the major NC is closed effectively on 21/01/2022. Continuous implementation will be further verified in the next assessment. | | | |
| Verification Statement: | Appointment letter for person in charge on compliance of Employment Contracts among contractors has been made. Refer "Surat Lantikan Pegawai Pemantau | | | |



| Dokumen" to Mr Hasbi Mamat dated 01/01/2022. Document reference number: 601/BKTTONGKATB. |
|---|
| Meeting with contractors has been conducted on 04/01/2022. Refer minutes of meeting "Penerangan Pematuhan Kontraktor" by Mr Hadi Helmi Che Hassan. Based on the above evidence, the major NC is closed on 21/01/2022. Continuous implementation was verified in this assessment and was found that the contractors already paying their workers the Public Holiday pay. This Major NC is effectively close. |

| Non-Conformity Report | | | | |
|-----------------------------|--|---------------------------------------|------------------------------------|--|
| NCR Ref #: | 2136025-202111-N1 Issue Date: 25/11/2021 | | 25/11/2021 | |
| Due Date: | 11/11/2022 | Date of Closure: | 11/11/2022 | |
| Area/Process: | Belitong POM | Clause & Category: (Major / Minor) | MSPO 2530 Part 4: 4.4.2.2 Minor | |
| Requirements: | The system shall be able manner, which is accept | | ective, timely and appropriate | |
| Statement of Nonconformity: | The response on Comple | aint and Grievance recorded | not effectively implemented. | |
| Objective Evidence: | There is no evidence of response by management on 2 complaints dated 04/01/2021 and 08/02/2021 for House number 17A and 27/86F respectively. It was against Prosedur Menangani Aduan dan Rungutan Document No: FGV/ML-1A/L2-Pr13 dated 01/04/2019 Section 9.0. | | | |
| Corrections: | To conduct training on SOP for "Menangani Aduan dan Rungutan to person in charge. To discuss implementation SOP for "Menangani Aduan dan Rungutan" in management meeting. | | | |
| Root cause analysis: | Management was not monitor grievance received from workers due to person in charge not aware on SOP for "Menangani Aduan dan Rungutan". | | | |
| Corrective Actions: | Evidence on training of SOP for "Menangani Aduan dan Rungutan to person in charge. Minute of meeting on discussing implementation on SOP for "Menangani Aduan dan Rungutan. | | | |
| Assessment Conclusion: | CAP has been accepted and evidence of CAP effectiveness to be verified in the next assessment. | | | |
| Verification Statement: | During the assessment, it was noted that the training has been conducted to the workers regarding the procedure of the Grievances. Interview has been conducted with the Person In Charge (PIC) for communication regarding the process of complaints, it was noted that the PIC are well verse with the procedure. Records of complaints is verified at site, all complaints had record of action taken within the stipulated time, The Minor NC is closed effectively. | | | |



| Opportunity For Improvement | | | | |
|-----------------------------|---|--|--|--|
| Ref: | 2136025-202111-I1 | | | |
| Area/Process: | Belitong POM | | | |
| Objective Evidence: | Management could improve on awareness and enforcement on disposal of domestic waste as a mean of environmentally friendly. | | | |
| Verification Statement: | The waste management at the site was sighted, the estate has disposed the domestic waste at the land fill. The location of landfill is maintain and clean, the process of layering the domestic waste and soil was conducted to prevent and waste taken by animals. | | | |

3.4 Summary of the Nonconformities and Status

| CAR Ref. | Clause & Category (Major / Minor) | Issued Date | Status & Date (Closure) |
|-------------------|--------------------------------------|-------------|-------------------------|
| 1696075-201804-N1 | Part 3, 4.4.4.2 Minor | 18/10/2018 | Closed on 14/11/2019 |
| 1849591-201906-M1 | Part 3, 4.3.1.1 Major | 14/11/2019 | Closed on 12/2/2020 |
| 1849591-201906-M2 | Part 3, 4.4.4.2 Major | 14/11/2019 | Closed on 12/2/2020 |
| 1849591-201906-M3 | Part 3, 4.5.3.2 Major | 14/11/2019 | Closed on 12/2/2020 |
| 1849591-201906-M4 | Part 4, 4.3.1.1 Major | 14/11/2019 | Closed on 12/2/2020 |
| 1849591-201906-N1 | Part 3, 4.5.3.5 Minor | 14/11/2019 | Closed on 8/3/2021 |
| 2002762-202012-M1 | Part 3: 4.3.1.1 Major | 17/12/2020 | Closed on 8/3/2021 |
| 2002762-202012-M2 | Part 3: 4.5.3.3 Major | 17/12/2020 | Closed on 8/3/2021 |
| 2002762-202012-M3 | Part 4: 4.4.4.1 Major | 17/12/2020 | Closed on 8/3/2021 |
| 2002762-202012-N1 | Part 4: 4.4.4.2 Minor | 17/12/2020 | Escalated to Major NC |
| 2002762-202012-N2 | Part 4: 4.4.5.4 Minor | 17/12/2020 | Closed on 25/11/2021 |
| 2136025-202111-M1 | Part 4: 4.4.4.2 Major | 25/11/2021 | Closed on 21/01/2022 |
| 2136025-202111-M2 | Part 3: 4.4.5.4 Major | 25/11/2021 | Closed on 21/01/2022 |
| 2136025-202111-N1 | Part 4: 4.4.2.2 Minor | 25/11/2021 | Closed on 11/11/2022 |
| 2273538-202211-M1 | Part 3: 4.4.4.2 (d) Major | 11/11/2022 | Closed on 09/02/2023 |
| 2273538-202211-M2 | Part 4: 4.3.1.1 Major | 11/11/2022 | Closed on 06/03/2023 |
| 2273538-202211-M3 | Part 4: 4.4.4.2 (b) Major | 11/11/2022 | Closed on 09/02/2023 |
| 2273538-202211-N1 | Part 3: 4.5.3.5 Minor | 11/11/2022 | Open |

3.5 Issues Raised by Stakeholders

| IS# | Description |
|-----|--|
| 1 | Issues: Sazilan bin Abd Wahid/ Tabung Haji Plantation Berhad |



Tabung Haji Plantation Berhad, Bukit Lawing and Sumalayang Estate located next to FGVPM Bukit Tongkat Estate. Boundaries for both estates has been well maintained by both parties and can be clear seen base on boundary markers and 10ft drain that has been constructed. Mr Sazilan confirmed that there is no dispute or land issues between both companies. He also aware method/mechanism of communication if there are any issues related to land.

Management Responses:

The management noted with the comment and committed to maintain good relationship with neighbouring estate and to maintain good condition of boundaries.

Audit Team Findings:

No further comment.

2 Issues: Khairul Aklam bin Yusoff/ Imam 2 Masjid An Naim

Mr Khairul Aklam said Masjid An Naim located in the Felda Ulu Belitong and most of the staff in FGVPM Bukit Tongkat Estate is khariah to the masjid. There several activities have been conducted by Masjid An Naim throughout the year 2021 and 2022 with participation of FGVPM Bukit Tongkat staff as well. Cost of operation for Masjid An Naim is based on donation and Mr Khairul said they are open to receive any contribution from any parties for activities at Masjid An Naim.

Management Responses:

The management of FGVPM Bukit Tongkat Estate noted with the comment and would try to look into any possibilities for contribution for Masjid An Naim.

Audit Team Findings:

No further comment.

3 Issues: Sri Syamsuryani Mohd Damin/ Ponirah Enterprise

Mdm Sri is the Senior Assistant Manager for Ponirah Enterprise where to company supply hardware and equipment to the FELDA settler, smallholders and estates. FGVPM Bukit Tongkat is not main customer for Ponirah Estate and only purchase item in small scale. There is no pending payment by FGVPM Bukit Tongkat and FGVPI Belitong POM since all payment done by cash.

Management Responses:

The management noted with the comment and will maintain good relationships with all stakeholders.

Audit Team Findings:

No further comment.

4 Issues: Nordin Abu Yariz/ Bukit Tongkat Enterprise

Bukit Tongkat Enterprise has been appointed as contractor to transport FFB from FGVASSB Ulu Belitong to FGVPI Belitong POM since past 4 years. As said by Mr Nordin, the operations have been round as family business where all lorries operated by the family members. There are no issues of payment where payment done by estates base on weighbridge tickets and done through online transfer 15th every months.

Management Responses:

Noted with the comment and will keep monitor compliance of the contractor on legal requirement.

Audit Team Findings:

No further comment.

5 Issues: Mohd Kassim Mohammed Ali/ National Union Plantation Workers (NUPW)



As mentioned by Mr Mohd Kassim there is no plan for NUPW to open memberships and promote NUPW in FGV estates since FGV is not member of MAPA. However, he mentioned that NUPW is open for any collaboration and cooperation between FGV and NUPW.

Management Responses:

The management noted with the comment and aware with the changes.

Audit Team Findings:

No further comment.

3.6 List of Stakeholders Contacted

| Government Officer: | Community/neighbouring village: |
|--------------------------------|---|
| Nil | Imam Masjid An Naim |
| | Tabung Haji Plantation Bhd |
| | |
| Suppliers/Contractors/Vendors: | Worker's Representative/Gender Committee: |
| Bukit Tongkat Enterprise | NUPW |
| Ponirah Enterprise | |
| | |



Section 4: Assessment Conclusion and Recommendation

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

Based on the findings during the assessment Belitong Palm Oil Mill And Supply Bases Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Belitong Palm Oil Mill And Supply Bases Certification Unit is continued.

| And Supply bases Certification Unit is continued. | |
|---|-------------------------------|
| Acknowledgement of Assessment Findings | Report Prepared by |
| Name: | Name: |
| NOROLSAIFUL HAZRI BIN HAMID | AHMAD RUFI BIN ABU TALIB KHAN |
| Company name: | Company name: |
| FGV HOLDINGS BERHAD | BSI SERVICES MALAYSIA SDN BHD |
| Title: | Title: |
| SUSTAINABILITY MANAGER | CLIENT MANAGER |
| Signature: Date: 02 MAR. 2023 | Date: 16/02/2023 |



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 | | |
|-----------------------|---|--|------------|--|--|
| 4.1 Prin | 4.1 Principle 1: Management commitment & responsibility | | | | |
| Criterio | n 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy | | | | |
| 4.1.1.1 | A policy for the implementation of MSPO shall be established. - Major compliance - | Sighted Sustainability Policy (FGV/SED/POL/003) Rev.03 under FGV Holdings Berhad signed and approved by Mohd Nazrul Izam Mansor (Group CEO) dated 26/01/22. | Complied | | |
| 4.1.1.2 | The policy shall also emphasize commitment to continual improvement. - Major compliance - | The Sustainability Policy mentioned above contained information and commitment to comply with policy, procedure, legal and other requirements. Also included commitment to sustainability or continual improvement. | Complied | | |
| Criterio | n 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. | As stated in the SOP established, the internal audit was scheduled at minimum of once a year. MSPO Internal Audit was conducted on 11-12/10/22. Auditor were Ahmad Akram and Azwan Muhammad. | Complied | | |
| | - Major compliance - | In FGVPM Bukit Tongkat B, Internal Audit was conducted on 13-14 October 2022 by Hilmie Zalfruez and Akhmal Hakim Safwan Adnan. | | | |
| 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. | FGV Holdings Berhad has established SOP for Internal Audit and documented in Internal Audit Procedure, document no. FGV/GSD-SCCD/SOP/04 Version: 0.0, dated 03/09/2020. Sighted Action Plan for 14 nonconformities raised for FGVAS Ulu Belitong during Internal | Complied | | |
| | - Major compliance - | Audit conducted on 11-12/10/22. Root causes stated clearly, and | | | |

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| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|---|--|------------|
| | | corrective actions proposed accordingly. All action with status completed. (NCRs raised by auditor as internal audit conducted on 13-14/10/2022. Action to investigate root causes and planning action for correction clearly stated. | |
| 4.1.2.3 | Report shall be made available to the management for their review. - Major compliance - | The internal audit report was documented and made available for management review as sighted signature and endorsement by both Estate Managers. | Complied |
| Criterio | n 4.1.3 – Management Review | | |
| 4.1.3.1 | The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance - | Management Review was conducted on 31/10/22 held at Meeting Room of FGVAS Bukit Besar attended by 5 members and discussed issues such as internal audit result, FFB production, environment, social, OSH, training, housing, MSPO implementation. Minutes was signed and approved by Station Manager. FGVPM Bukit Tongkat B has conducted Management Review ads documented in the Minutes of Meeting No. 01/2022 which attended by 7 workers involving Estate Managers, Assistant Managers, Supervisor, Clerks. | Complied |
| Criterio | n 4.1.4 – Continual Improvement | | |
| 4.1.4.1 | The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance - | Continual Improvement for FY 2022 established and documented covering environment, social and economic issues. Among programme included: • Beneficial plant | Complied |
| | . iajo: compilatico | Management of empty chemical containers Effective use of paper | |

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| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|--|--|------------|
| | | Gotong royong perdana Enhance company revenue. | |
| 4.1.4.2 | The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. - Major compliance - | Sighed a mist blower and mechanization programme such as machinery such as badang, mini tractor in field operation. FGVPM Bukit Tongkat has established Continual Improvement Plan for FY 2022 dated and approved by Estate Manager on 03/01/22. Among target set for achieving continual improvement included: Social: Increase frequency of meeting for discussing workers welfare. Reduce use of pesticides and alternative for safer type. Use of mechanisation for harvesting. Achieving target base on annual budget. | Complied |
| 4.1.4.3 | An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance - | Training to workers in aspects of good agriculture practices in plantation management were conducted throughout the year. As evidence, sighted the training programme for year 2022. | Complied |
| 4.2 Prin | ciple 2: Transparency | | |
| Criterio | 1 4.2.1 – Transparency of information and documents relevan | t to MSPO requirements | |
| 4.2.1.1 | The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance - | Adequate information covering on environmental, social and legal issues which are relevant to stakeholders is shared for effective participation and decision making. Handbook of RSPO Certification for FELDA and FGV were distributed to all the stakeholders. Explanation of RSPO, MSPO, ISCC and all the policies were clearly stated in the handbook. Besides, process of complaints and | Complied |

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| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | | grievances were included in the handbook and also published at the main office notice board. | |
| 4.2.1.2 | Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance - | FGVAS Ulu Belitong and FGVPM Bukit Tongkat B holds copies of each of the management documents that are required to be publicly available. Last communication was on 03/01/2022 to all stakeholder regarding to document that publicly available. Refer MEMO "Penyedian Rujukan Dokumen umum di Pejabat FGVAS and FGVPM" document reference (01) MEMO-RSPO/MSPO2022. Besides, all the information such as annual report, sustainability news and policies were found available in the company's website: www.fgvholdings.com | Complied |
| Criterio | n 4.2.2 – Transparent method of communication and consulta | tion | |
| 4.2.2.1 | Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance - | FGV Holdings Berhad has developed SOP on "Komunikasi, Penglibatan dan Rundingan" procedure (Doc Number: FGV/ML-IA/L2-Pr12) where the procedure has stated the information that provided to the stakeholders such as policies, social impact assessment and environment aspects. FGVAS Ulu Belitong has conducted stakeholder feedback survey meeting on 24/10/2022. Refer "REKOD MAKLUMAN DAN MAKLUM BALAS". Sighted involvement of Government Agencies, Contractors, | Complied |
| | | Villagers and Neighbouring estates. FGVPM Bukit Tongkat B has conducted stakeholder feedback survey meeting on 13/01/2022. Refer "REKOD MAKLUMAN DAN MAKLUM | |
| | | BALAS". Sighted involvement of Government Agencies, Contractors, Villagers and Neighbouring estates. | |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | | During the meeting, the management has explained the requirements of sustainable palm oil certification to all the stakeholders. Mostly topic covered were Transparency, Safety and Environment topic. | |
| 4.2.2.2 | A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. | Management has appointed person in charge on communication and social matters. Refer Appointment letter as below: | Complied |
| | - Minor compliance - | FGVAS Ulu Belitong: Mr Mohd Rizal Bin Jamaluddin dated 01/02/2022 FGVPM Bukit Tongkat B: Mr Khairuddin Bin Ab Halim dated 02/01/2022 | |
| 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 lists were last updated on 22/01/2022 for both estates where internal and external stakeholders have been included. Consultation and communication record as stated in the 4.2.2.1. There is no complaint and grievances recorded by the stakeholders. | Complied |
| Criterio | n 4.2.3 – Traceability | | |
| 4.2.3.1 | The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance - | FGVAS Bukit Tongkat, Ulu Belitong, had implemented traceability program based on Sustainability Manual for Transportation of FFB to Mill (MLSL(Ed.3)-Sec.4(8.0) dated 01/09/17, the procedure established for the implementation of all traceability requirements. | Complied |
| 4.2.3.2 | The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance - | The estate management holds the responsibility on regular inspection of traceability system. Periodical inspections also being conducted through Regional Controller, Internal Audit and Agronomist visit. | Complied |
| | | The effectiveness of the monitoring will evidence in the internal audit and visit report findings. | |



| Criterio | on / 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 - | FGVAS Bukit Besar has appointed Mohd Firdaus Ibrahim (Supervior Ulu Belitong) and Muhamas Afif Ayob (Mandore Ulu Belitong) as Appointment Letter dated 03/01/22 by Din Ibrahim (Station Manager) as PIC for Traceability with roles and function clearly stated. FGVPM Bukit Tongkat has appointed Hasbi Mamat (Asst Manager) as Appointment Letter dated 02/02/22 and endorsed by Estate Manager (Hadi Helmi Che Hassan). Roles and responsibilities clearly defined as PIC to ensure traceability practices. | Complied |
| 4.2.3.4 | Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance - | Available a record of daily FFB sold for Ulu Belitong Peringkat 1, 2 & 3 found consistently updated and maintained. Among information recorded in <i>Rekod Kemajuan Kerja Penuaian dan Pengangkutan Hasil Harian</i> included: • Area/Field • Delivery Order • Receipt from Ulu Belitong POM • Lorry No. • Total MT • No of bunches • Average weight of bunches • Productivity • Price • % OER This recording was prepared by Mohd Firdaus Ibrahim (Supervisor), checked by Mohd Nor Boyman (Executive) and approved by Din Ibrahim (Station Manager). | Complied |

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| Criterion / Indicator | Assessment Findings | Compliance |
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| | In FGVPM Bukit Tongkat available a record of sales of FFB to Belitong POM for month of August and September 2022. Information included: | |
| | Block/Peringkat | |
| | Net weight | |
| | % OER | |
| | Price | |
| | Penalty and deduction | |
| | Sample of FFB Ticket were sighted as follows: | |
| | 1. Weighbridge Ticket No: A00019980 | |
| | FFB Delivery Note: 019274 | |
| | Estate Name: FGVPM Bukit Tongkat B Estate | |
| | Transporter: FGVPM Bukit Tongkat B Estate | |
| | Field No: P06/P7/05 | |
| | Date: 08/09/2022 | |
| | Net Weight: 6.09 mt | |
| | 2. Weighbridge Ticket No: A00019950 | |
| | FFB Delivery Note: 01463 | |
| | Estate Name: FGVAS Ulu Belitong Estate | |
| | Transporter: FGVAS Ulu Belitong Estate | |
| | Field No: P3 | |
| | Date: 08/09/2022 | |
| | Net Weight: 5.87 mt | |

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| Criterion / Indicator | | Assessment Findings | Compliance | |
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| 4.3 Prin | 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 - | The legal compliance lists of permits & licenses are available and being monitored and updated periodically by person in- charge of Legal Requirements. Details as below: - FGVAS Ulu Belitong: 1. MPOB License no. 503540902000. Validity period from 01/09/2022 - 31/08/2023 - 147.7 ha 2. Salary deduction permit for Premium Insurance Luar Negara Tenaga Kerja Indonesia amounting RM63.00 per person with ref. BHG. PU/9/129 Jld 26[22] dated 30/09/2016 3. Salary deduction permit for water, electricity, medical fees that exceeded limit and other advance permit with ref. no. (22) dlm BHG. PU/9/129 Jld 23 dated 26/4/2016. The subsidy for water is RM4.00 and Electricity is RM6.00 per person. FGVPM Bukit Tongkat B: 1. MPOB License no. 558895002000. Validity period from 01/03/2022 - 28/2/2023 2. Diesel permit no B.PGK. JH (KLU) 2303 SK Valid from 04/02/2022 till 03/02/2024, Diesel 15,000 liter and petrol 200 liter 3. Fire Extinguisher – 35 units. Valid until 01/06/2023 | Complied | |



| Criterion / Indicator | | Assessment Findings | Compliance |
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| 4.3.1.2 | The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance - | The applicable laws identified were listed in Register of Legal and Other Requirements, [FGV/GSD-SR/LR001]. The sample of Act and Legal at FGVPM Bukit Tongkat B Estate and FGVAS Ulu Belitong as listed herein: 1. OSHA 1994 2. Pesticides Act 1974 and Regulations, 3. Environmental Quality Act and Regulations 1974 4. Factories and Machinery Act and Regulations, 1967 5. Weights and Measures Regulations 1981 6. Electricity Regulations 1994 7. Immigration Act 1959 8. Employee Provident Fund 1991 9. Etc 10. Minimum Wages Order 2022 11. Employment Act Rev 2022 Last updated of the Register was on: Estate Date Updated FGVAS Ulu Belitong FGVPM Bukit Tongkat 01/11/2022 | 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 - | FGV Holdings Berhad have centralised system for tracking any changes in the law as per "Panduan: Sistem Pengesanan Perubahan Undang-undang" dated 23/06/2015, Version:04. Any changes in the relevant regulations are through Plantation and Sustainability Department and the Manager, who are sole responsible. | Complied |



| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | New applicable legal amendment was updated in the legal register, sample as the following: 1. Minimum Wages Order 2022 2. Employment Act – Rev 2022 | |
| 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 - | The person in -charge for FGVPM Bukit Tongkat B is En. Hasbi Bin Mamat appointed vide letter dated 02/01/2022 approved by En Hadi Helmi Bin Mat Hassan, Estate Manager. As for FGVAS Ulu Belitong, En Mohd Firdaus Ibrahim as the person in charge of Legal Requirement vide letter dated 03/01/2022 approved by Mr Din Ibrahim, Station Manager. | Complied |
| Criterio | n 4.3.2 - Lands use right | | |
| 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 - | Development Authority and Felda Agricultural Services Sdn Bhd dated 09/04/2021 with validity from 01/01/2021 to 31/12/2035. Refer Letter (45) 1450/1/11 Pt.2. The total hectarage for FGVAS Ulu Belitong was 147.70 ha. | Complied |
| | | Bukit Tongkat B Estate holds total 20 land titles (Under FGV and FELDA) which they leased from FELDA for 1237.85 Ha. There is deduction for land acquisition by Government with total 6.59 ha. | |
| 4.3.2.2 | The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance - | The rental agreement was signed between Federal Land Development Authority and Felda Agricultural Services Sdn Bhd dated 09/04/2021 with validity from 01/01/2021 to 31/12/2035. Refer Letter (45) 1450/1/11 Pt.2. The total hectarage for FGVAS Ulu Belitong was 147.70 ha. | Complied |



| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|--|------------|
| | | Bukit Tongkat B Estate holds total 20 land titles (Under FGV and FELDA) which they leased from FELDA for 1237.85 Ha. There is deduction for land acquisition by Government with total 6.59 ha. | |
| 4.3.2.3 | Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance - | Legal boundary for both estates were clearly demarcated and visibly maintained. FGVAS Ulu Belitong The estate clearly demarcated the legal boundary with fences as sighted at field Peringkat 1 block 10 adjacent with FELDA settlers housing area and FGVPM Bukit Tongkat. Sighted "Rekod Pemantauan Batu Sempadan" dated 12/10/2022. FGVPM Bukit Tongkat B The estate clearly demarcated the legal boundary with fences as sighted at field PM00H adjacent with Kluang Forest Reserve. | 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 Ulu Belitong Certification Unit at the time of audit. The lands are belonged to Lembaga Kemajuan Tanah Persekutuan via verified with the land titles. Interview with the stakeholders confirmed that no encroachment of land by certification unit. | N/A |
| Criterio | 1 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 land encumbered by customary rights under Belitong certification unit. | N/A |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|--|--|------------|
| 4.3.3.2 | Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance - | There is no land encumbered by customary rights under Belitong certification unit. | 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 encumbered by customary rights under Belitong certification unit. | N/A |
| 4.4 Prin | ciple 4: Social responsibility, health, safety and employ | ment condition | |
| Criterio | n 4.4.1: Social Impact Assessment (SIA) | | |
| 4.4.1.1 | Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance - | SIA was conducted on 23/1/2018 for FGVAS Ulu Belitong and 24/01/2018 for FGVPM Bukit Tongkat B by Certification & Due Diligence Department (CDD). Stakeholders such as workers, contractor, and external stakeholders were participated in the assessment. Positive and negative impacts have been recorded in the SIA Management Plan. Sighted "Pelan Pengurusan (Management Plan) Bagi Impak Negatif Sosial di Ladang FGVAS Ulu Belitong" dated 09/11/2022. Sighted Pelan Tindakan Impak Negatif FGVPM Bukit Tongkat B 2021/2022 dated 28/10/2021. Sighted "Pelan Pengurusan (Management Plan) Bagi Impak Negatif Sosial Di Ladang FGVPM Bukit Tongkat B" dated 09/11/2021. Which listed 3 negative issues: | Complied |
| | | 1 | |
| | | EPF Contribution has not been made by the contractors Pending of passport/permit renewal for foreign workers | |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | | Mitigation measure has been established for all identified negative measure, and all issues are still in continuous monitoring. | |
| Criterio | n 4.4.2: Complaints and grievances | | |
| 4.4.2.1 | A system for dealing with complaints and grievances shall be established and documented. - Major compliance - | FGV Holdings Berhad has developed procedure of dealing with complaint and grievances. Refer SOP: FGV/ML-1A/L2-Pr13 Issue No. 2 Rev. 02 dated 01/04/2019. The objectives of the procedure are to provide a channel for the internal stakeholders and external stakeholders to lodge any complains to the management. Mechanism to handle complaints was clearly described in the procedure. The time frame for investigation of the issue should be done within 14 working days. Refer Section 9 Carta Alir Proses Aduan. | Complied |
| 4.4.2.2 | The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance - | The estates are using Complaint Form for external stakeholder and Complaint Book to record complaints and requests reported by the internal workers. There was no complaint received from external stakeholders for FGVAS Ulu Belitong Estate. Sighted sample of complaint at FGVAS Ulu Belitong B: 1. Date: 01/06/2022, Bipul, Issue: Broken Door Lock, Management has solved the issue on 04/06/2022. | Complied |
| | | Date: 07/06/2022, Nazmul, Issue: Broken Sickle, Management replace the sickle on the same day. Date: 13/06/2022, Hasrullah, Issue: Broken sickle, Management | |
| | | solved the issue on the same day by replacing the unit. FGVPM Bukit Tongkat B | |
| | | 1. Date: 19/09/2022, Mohd Napi Bin Mutallip, Issue: Leaking pipe, Management solved the issue by hiring the contractor on 21/09/2022 | |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | | 2. Date: 30/08/2022, Hafizul Mohammad, Issue: Broken door knob, Management solved the issue by replacing to new knob on the same day | |
| 4.4.2.3 | A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance - | The estates are using Complaint Form for external stakeholder and Complaint Book to record complaints and requests reported by the internal workers. There was no complaint received from external stakeholders. | Complied |
| 4.4.2.4 | Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance - | Awareness training has been conducted on 19/09/2022 at FGVAS Ulu Belitong. Refer training material "Penerangan Komunikasi (Aduan & Rungutan), Ikrar Anti Rasuah, Hak Asasi Manusia, Kebebasan Bersuara Dan Menganggotai Kesatuan". Training has been given by Mr Mohd Firdaus and attended by 14 participants. Interview with the internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure and they were briefed by the management during stakeholder meeting. | Complied |
| 4.4.2.5 | Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance - | The estates are using a form "Borang Permohonan Pembaikan Asrama and Borang Kerosakan & Pembaikan Rumah Kakitangan/Pejabat/ Asrama/ Stor". The past 24 months records of complaint were still available for verification. | Complied |
| Criterio | n 4.4.3: Commitment to contribute to local sustainable develo | pment | |
| 4.4.3.1 | Growers should contribute to local development in consultation with the local communities. - Minor compliance - | Sighted CSR record for 2022: FGVAS Ulu Belitong Estate 1. Sumbangan Hari Raya 2022 to all estate workers dated 20/04/2022 FGVPM Bukit Tongkat B Estate | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | | Approval to Jawatankuasa Kemajuan Dan Keselamatan Rancangan to use grass cutting machine in clean up the community areas. | |
| Criterio | n 4.4.4: Employees safety and health | | |
| 4.4.4.1 | An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance - | OSH Policy (FGV/GHR/HSEQ/POL/003) Rev. 5.0for FGV Holdings Berhad documented, signed and approved by Mohd Nazrul Izam Mansor (CEO) dated 05/11/2021. The policy mentioned statement of commitment to enhance and established safe and healthy operation and workplace. | Complied |
| 4.4.4.2 | The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: all employees involved shall be adequately trained on safe working practices 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 | a) Safety and Health Policy was sighted at notice board (office) and communicated to workers during morning briefing. Interview with workers from both estates found having awareness on the OSH Policy. b) HIRARC (FGV/FGVPM/F(IMS) 1.3/Pind 1) for FGVAS Bukit Besar Estate for activities of harvesting, pruning dated 26/07/22. The HIRARC is guided by the document Guidelines for Hazard Identification, Risk Assessment and Risk Control (HIRARC), Department of Occupational Safety and Health, 2008. The assessment covers all main operations and support operations. FGVPM Bukit Tongkat B Estate has conducted and reviewed HIRARC on 25/02/20 which found all score points as low and no recommendation for new control measures required. In FGVPM Bukit Tongkat B Estate, Hearing Conservation Programme 2021 by RZ Intan Medicare Sdn Bhd. Medical Surveillance was conducted in 2021 as report prepared by RZ Intan Medicare Sdn. Bhd. Baseline of NRA for FGVPM Bukit Tongkat Estate by Assessor (HQ/14/PEB/00/136). CHRA was | Major Non Compliance |



| Criterion / Indicator | Assessment Findings | Compliance |
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| (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. 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. j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. - Major compliance - | conducted by Occumed Consultancy & Services Sdn Bhd by Dr. Yasriza (JKKP/HQ/10/ASS/00/8 on 29/09/20. Medical Surveillance planned to be conducted in November 2022 as namelist provided for 5 workers. While Audiometric Test to be conducted for 9 workers as stated. c) The management has conducted the training towards the safety requirements in term of handling the products, sample of training sighted: 1. Handling and driving of Mini Kobuta & Badang dated 05/04/2022 – FGVAS Ulu Belitong Estate 2. Training of Spraying, Triple Rinse and PPE dated 10/08/2022 – FGVAS Ulu Belitong Estate 3. Harvesting Training dated 06/02/2022 FGVPM Bukit Tongkat B Estate 4. PPE and HIRARC Training dated 08/08/2022 – FGVPM Bukit Tongkat B Estate d) Sighted documented a PPE Guidelines under FGV Plantation (M) Sdn. Bhd. (FGVPM/L3/GPK-002) Rev.00 dated 01/02/20. Available PPE Matrix approved by Estate Manager dated 01/12/20. Focus from site visit for Harvester indictaed requirements of PPE such as Safety Helmet, Google/Safety Glass, Cotton Glove, Wellington Boots. This not consistent with sample Harvester at Block PM10 N where no Safety glass/Google or Wellington Boot used from 5 harvesters sampled. HIRARC (FGV/FGVPM/F(IMS) 1.3/Pind 1) dated 25/02/20 for Harvesting and collection of loose FFB mentioned current control measure to wear Wellington Boots. Available Record of PPE issuance to workers as verified. The Major NC is raised. | |



| Criterion / Indicator | Assessment Findings | Compliance |
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| | e) FGV Holdings Berhad has established SOP for Chemical Handling and documented in the Safety Operating Procedure, Chemica Handling. Refer doc no. FPI-PK-036, issue no. 3 dated 14/07/2010. | |
| | f) In FGVPM Bukit Tongkat B Estate, sighted appointment letter o 13 member of SHC as Appointment Letter dated 01/01/22 from Hadi Helmi b. Che Hassan (Estate Manager). | |
| | Sighted a folder of SDS kept and updated as current revision status within 5 years for Benocide 50WP (24/01/19), GF Surfactant (04/04/20), Kenlon (20/09/19), Sodium Chlorate (23/01/18) and etc. | • |
| | g) Safety and Health Committee meeting was conducted as required on 30/09/22, 24/06/22, 25/03/22, 13/12/21. Among discussed related to OSH issues. | |
| | SHC meeting was conducted on 24/02/22, 19/05/22, 11/08/22 in FGVPM Bukit Tongkat B for year 2022. | 1 |
| | h) Emergency SOP (FGV/FGVPM/II/IMS/15/013 Ver.02 dated 01/11/21 to explain process of determining emergency emergency preparedness and response for handling scenarios such as fire, chemical spillage, earth quake, flood, terrorist threat pandemic and etc. | |
| | i) SOP for First Aid Kit (FGVP M/L3/GP K-003) Rev.0 effective date 01/02/2020 established and documented to cover process o handling and replenish content of First Aid Box. Found 1st Aid box for group of harvester in FGVAS Ulu Belitong well maintained and sufficient. | |
| | In FGVPM Bukit Tongkat as sampled found available a system to check and inspect content of $1^{\rm st}$ Aid Box from checklist (Kerta: | |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | | Semak Pemeriksaan Kandungan Peti/Kit Pertolongan Cemas) dated 25/10/22, available a document titled First Aid Box/Kit Guidelines (FGVPM/L3/GPK-003) which revised from memo issued dated 04/04/22. Inspection done by Khairuddin AB Halim (Workers Affair Clerk). First aid training was attended by Khairuddin b. AB Halim, Mohd Khairul Anuar b. Selamat on 20-21/06/22 by SAC Consultancy Sdn. Bhd. under Kursus First Aid and CPR. | |
| | | j) There is no accident reported so far in 2022 until month on October. This was verified with Monthly HSE Report for FGVAS Ulu Belitong (Jan-October 2022). | |
| | | In FGVPM Bukit Tongkat B, a form JKKP 8 was sent to DOSH on 25/01/22 where no accident recorded for year 2021. | |
| Criterio | 1 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 - | FGV Holdings Berhad has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.0 (B). Respecting Human Right. FGV is committed and support human rights. Communication to the employees was done in various methods such as briefing during morning muster, display on notice boards at workers' hostel and training. Interview with workers showed that they have a good understanding on human rights. | Complied |
| | | Latest awareness on the policies has been conducted on: FGVAS Ulu Belitong: 06/10/2022 FGVPM Bukit Tongkat B: 08/08/2022 | |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| 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 - | FGV Holdings Berhad has established Equal Opportunity Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.2.1 Equality and Non-Discrimination. The company is committed to ensure all the employees are treated equally regardless of race, nationality religion, gender, age and other political opinions. Interview with the workers showed that no discrimination is being practiced. Latest awareness on the policies has been conducted on: FGVAS Ulu Belitong: 06/10/2022 FGVPM Bukit Tongkat B: 08/08/2022 Interview with sample workers verified that there are no discriminatory practise happened in the estate. | Complied |
| 4.4.5.3 | Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance - | FGV Plantations (M) Sdn Bhd has established an employment contract for its foreign workers. Pay and conditions are documented and are above the Minimum Wage Order 2020. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Sampled of the agreement and pay slips for the months of March 2022, June 2022, and September 2022 as below: FGVAS Ulu Belitong 1. Employee ID: PB001919017 2. Employee ID: PB001919131 3. Employee ID: PB001919223 4. Employee ID: PB001919171 FGVPM Bukit Tongkat B | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|---|--|------------|
| | | Employee ID: FW06012708 Employee ID: FW06010724 Employee ID: FW06010847 Employee ID: LW01950229 | |
| 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. | Sighted availability of contractors at FGV AS Ulu Belitong Estate. FGVAS Ulu Belitong — Bukit Tongkat Enterprise, Project: FFB Transport, Refer SPK 820105001-2021/820231503-10-111 dated 01/01/2022 until 31/12/2022. | Complied |
| | - Minor compliance - | Verification of the contractor worker have been made, there is only one worker that are working in the company. Sample of salary slip were taken for the month of August 2022 and September 2022, verified that the salary are paid according to Minimum Wages Order 2022 requirement. | |
| 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 - | FGVAS Ulu Belitong All the recruited workers will be registered in the Online Plantation Management System (OPMS) where personal details such as name, nationality, date of employed, job description, wage rate, date of birth, gender and years of service was stated in the system. FGVPM Bukit Tongkat B | Complied |
| | | All the recruited workers will be registered in the e-Rangkaian Maklumat Ladang (e-RML) where personal details such as name, nationality, date of employed, job description, wage rate, date of birth, gender and years of service was stated in the system. | |
| 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 Contracts were issued and acceptance of copied of employment contract were acknowledged by the workers. The terms | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|--|---|------------|
| | employment records Major compliance - | and conditions were clearly stated in the employment contract such as annual leave entitlement, benefits and medical leave. | |
| | The second production of the second production | Sampled of the agreement and pay slips for the months of March 2022, June 2022, and September 2022 as below: | |
| | | FGVAS Ulu Belitong | |
| | | 1. Employee ID: PB001919017 | |
| | | 2. Employee ID: PB001919131 | |
| | | 3. Employee ID: PB001919223 | |
| | | 4. Employee ID: PB001919171 | |
| | | FGVPM Bukit Tongkat B | |
| | | 1. Employee ID: FW06012708 | |
| | | 2. Employee ID: FW06010724 | |
| | | 3. Employee ID: FW06010847 | |
| | | 4. Employee ID: LW01950229 | |
| 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 - | Both Estate is using Pocket Check roll Book where the attendance of workers is recorded on daily basis. Overtime is recorded in which is acknowledged by the workers and staff. The raw data will be key in in the system as 4.4.5.5. | 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 and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance - | Records reviewed on the Check roll Book of sampled workers found that the enter time and exit time was clearly stated in the timecard. The sampled workers above have recorded overtime not exceeding 104 hours per month. | Complied |



| Criterio | n / Indicator | Assessment Findings | Compliance |
|----------|---|---|------------|
| 4.4.5.9 | Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective | Documented pay slip was distributed to individual workers on the day of payment. | Complied |
| | agreements Major compliance - | All of them above have achieved the Minimum Wage Order 2022. Hours of overtime has recorded in the pay slip as well. | |
| | | Sampled of the agreement and pay slips for the months of March 2022, June 2022, and September 2022 as below: | |
| | | FGVAS Ulu Belitong | |
| | | 1. Employee ID: PB001919017 | |
| | | 2. Employee ID: PB001919131 | |
| | | 3. Employee ID: PB001919223 | |
| | | 4. Employee ID: PB001919171 | |
| | | FGVPM Bukit Tongkat B | |
| | | 1. Employee ID: FW06012708 | |
| | | 2. Employee ID: FW06010724 | |
| | | 3. Employee ID: FW06010847 | |
| | | 4. Employee ID: LW01950229 | |
| 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 - | The management has provided facilities such as mosque, recreational facilities such as futsal field, badminton court and volleyball court to the workers and dependents. Government clinic was available in the complex. The workers will be awarded with bonus once a year based on performance. Various incentive and allowance were also given to the workers. | 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 | The workers in the estates have been provided with basic facilities such as government clinic, football field, mosque, sundry shops and | Complied |



| Criterio | n / Indicator | Assessment Findings | Compliance |
|----------|---|---|------------|
| | compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. - Major compliance - | other amenities such as electricity and water supply from government with subsidize. Weekly inspection was recorded in "Borang Pemeriksaan Asrama Pekerja". Last inspection on 04/11/2022. | |
| 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 - | FGV Holdings Berhad has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.2.5 Preventing Harassment and Abuse. The company is committed to protect the rights of women on the reproductive and family planning. Gender Committee was developed at FGVPM Bukit Tongkat B to provide a system to channel the complaint regarding sexual harassment and violence. There was no issue regarding sexual harassment and violence reported. The last meeting was conducted on 26/01/2022. There is no gender committee at FGVAS Ulu Belitong due to no female workers there. | Complied |
| 4.4.5.13 | The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance - | FGV Holdings Berhad has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.2.2 Upholding Labour Standard. The company allows the employees to join any legal association and get approval from the management. There is no union form at both estates. Verified through Interview found that workers aware on no restriction to form and join union. Latest awareness on the policies has been conducted on: FGVAS Ulu Belitong: 06/10/2022 FGVPM Bukit Tongkat B: 08/08/2022 | Complied |



| Criterio | n / Indicator | Assessment Findings | 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 - | FGV Holdings Berhad has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.2.2 Upholding Labour Standard where the company will not recruit any individual who less than 18 years old to work in plantations. Document reviewed on the list of workers confirmed that all the employees were above 18 years old. Latest awareness on the policies has been conducted on: FGVAS Ulu Belitong: 06/10/2022 | Complied |
| | | FGVPM Bukit Tongkat B: 08/08/2022 | |
| 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 | Available Annual Training Programme for Staff of Ulu Belitong FY 2022. Covering main topic under OSH, Environment, Social, Policies and SOPs. (Jan-Dec) prepared by Mohd Firdaus b. Ibrahim (Supervisor). | Complied |
| | shall be kept. | Record of training sighted and retained such as: | |
| | - Major compliance - | Handling and driving Mini Kobota & Badang on 05/04/2022 attended by 9 drivers. | |
| | | Manuring briefing and training conducted on 08/04/2022 attended by 7 manurers. | |
| | | • Explanation and briefing on IPM, Nursery conducted on 09/07/2022 attended by 10 workers. | |
| | | Briefing and Training of Spraying, Triple Rinse and PPE was conducted on 23/05/2022 and attended by 2 workers. | |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|--|---|------------|
| | | • Training of spraying and chemical mixing was conducted on 10/08/2022 and attended by 4 workers. | |
| | | Scheduled Waste training was conducted on 18/10/2022 and attended by 8 workers. | |
| | | In FGVPM Bukit Tongkat B, training was conducted and records maintained as sampled: | |
| | | Briefing on SOP, Communication, Consultation and Grievances was conducted on 07/09/2022 attended by 58 workers. | |
| | | Triple Rinse Training was conducted on 14/02/2022 and attended by 52 workers. | |
| | | Briefing on PPE and HIRARC was conducted on 08/08/2022 and attended by 54 workers. | |
| | | Training on weeding conducted on 16/08/2022 and attended by 27 workers. | |
| | | Manuring train9ng was conducted on 10/08/2022 and attended by 9 workers. | |
| | | Briefing on Policies and Code of Ethic was conducted on 16/07/2022 and attended by 13 workers. | |
| | | Harvesting training was conducted on 06/02/2022 and attended by 48 workers. | |
| 4.4.6.2 | Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance - | Sighted in FGVPM Bukit Tongkat B, sighted a Training Needs Analysis FY 2022 covering topics under Environment, Social Aspects, OSH Aspects, Safe Work Practices and Good Agricultural Practices for all level of workers from Estate Managers, Assistant, Clerks, Certification Assistant, Mandore/Supervisor, Harvesters, Sprayers, Manurers, Drivers, New Workers, SHO, First Aider, SHC, Fire Fighting team, Contractor and Stakeholder. | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|---|---|------------|
| 4.4.6.3 | A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure. - Minor compliance - | FGVPM Bukit Tongkat B has established Annual Training Plan for FY 2022. As part of continual training to ensure that all employee are well trained in their job function and responsibility, in accordance to the documented training procedure covering SOP such as chemical handling (Aug), harvesting (Feb), manuring (May), spraying (May). | Complied |
| 4.5 Prin | ciple 5: Environment, natural resources, biodiversity a | nd ecosystem services | |
| Criterio | n 4.5.1: Environmental Management Plan | | |
| 4.5.1.1 | An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance - | FGV Holdings Berhad has established Environmental Policy Statement signed by the Group CEO, Mohd Nasrul Izam Mansor on 05/11/2021. Refer Document Number: FGV/GHR/HSEQ/POL/002 Revision:0.0 FGV/GGD/SD/008 Rev 2.0 FGV Holdings Berhad has documented Environmental policy in the Group Sustainability Policy under section 5.3: Protecting the Environment. The Group Sustainability Policy was signed by the CEO on 17/11/2020. Refer doc. no FGV/SED/POL/001 rev. 4(BI). The policy was communicated through training, briefing and displayed on notice board at several placed in the estate. | Complied |
| 4.5.1.2 | The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations Major compliance - | Environmental Aspects and Impacts Analysis [EAIA] being established under Pengenalpastian Aspek dan Penilaian Impak, No Borang: FGV/ FGVPM/IV/IMS/15/1.6 Pind 1. The EAIA covering 44 activities for instance: - 1. Spraying 2. Pre-mix at Store 3. Storage of Chemical | Complied |



| impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Management Control Adhere to Standard Operating Procedure and land land loose fruits pollution Operating Procedure Dose fruits pollution Operating Procedure Dose fruits pollution Operating Procedure Dose fruits Procedure Dose fruits D | Criterio | on / Indicator | | Assessm | ent Finding | gs | Compliance |
|--|----------|--|---|---|--|--|------------|
| impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Major compliance - Management Control Fertilization Dust fertilizer Air, water and land Operating Procedure pollution and wearing PPE Harvesting Uncollected Land Adhere to Standard loose fruits pollution Operating Procedure Transporting Usage of Air and Adhere to Standard diesel and land Operating Procedure Hydraulic oil pollution Land fill Heap of Potential Adhere to Standard | | | 5. Manuring6. Landfill7. Etc.Evidence, EAIA | | | | |
| waste for open Operating Procedure burning and frequent monitoring The status of implementation of the environment improvement plan | 4.5.1.3 | impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. | of Significance negative impaction implemented are activity. Fertilization Harvesting Transporting FFB Land fill | Form for the years and to promote and monitored. Sa Aspect Dust fertilizer Uncollected loose fruits Usage of diesel and Hydraulic oil Heap of waste | ear 2022 devote the positimple taken a Impact Air, water and land pollution Land pollution Air and land pollution Potential for open burning | veloped to mitigate the ive one and effectively as follows: Management Control Adhere to Standard Operating Procedure and wearing PPE Adhere to Standard Operating Procedure and frequent monitoring | Complied |



| Criterion / Indicator | | | Assessment | Findings | | Compliance | | | |
|-----------------------|--|---|---|--------------------|-------------------------------|------------|--|--|--|
| 4.5.1.4 | A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance - | docume Beliton 1. Plar 2. Effe | Sighted the programed to promote the positive impacts being documented in the Continual Improvement Plan. As for FGVAS Ulu Belitong the Continuous Improvement Plan as below: 1. Planting of beneficiary plant 2. Effective use of paper 3. Management of empty chemical container | | | | | | |
| 4.5.1.5 | An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and | manag | ates have established trainir ement and improvement pla g Programme for the year 202 | Complied | | | | | |
| | improvement plans and are working towards achieving the objectives. | No | Topic | Month Programme | Status | | | | |
| | - Major compliance - | FGVA | | | | | | | |
| | | 1 | HCV Management | 07/2022 | 02/10/2022 | | | | |
| | | 2 | Chemical Handling | 07/2021 | 23/09/2021 | | | | |
| İ | | 3 | Schedule Waste | 07/2022 | - | | | | |
| ı | | 4 | Triple Rinsing | 04/2022 | 23/05/2022 | | | | |
| | | | M Bukit Tongkat B | 06/2022 | 06/00/2022 | | | | |
| | | 1 | Prosedure – Pengenalpastian Kawasan Cerun Dan Rezab Sungai, Penilaian Impak Alam Sekitar (EIA) | 06/2022 | 06/09/2022 | | | | |
| 1 | | 2 | Pengenalan CABI | 04/2022 | 28/09/2022 | | | | |
| | | 3 | Pengurusan Makhluk Perosak | | 01/09/2022 | | | | |
| 4.5.1.6 | Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. | _ | r two-way communication imental committee meeting, tr | | ucted through muster call. | Complied | | | |



| | | AS | sessment Fir | naings | | Compliance |
|---|---|--|--|---|--|--|
| - Major compliance - | representative Belitong as date FGV/ 1st 25/0 2nd 24/0 3rd 30/0 | s has been te below: AS Ulu Bel 3/2022 6/2022 9/2022 | itong | quarterly bas | | |
| 4.5.2: Efficiency of energy use and use of renewable energy | | | | | | |
| 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 | Estates were k of renewable e basis. Sample | kept and denergy an taken on d | ocumented. It in the consumption of the consumptions of the consum | s monitored to | to optimize use or on a monthly | Complied |
| base period Major compliance - | Month/ Year 2022 | Baseline (liter) | Consumption Diesel | Electric Baseline (kwH) | Electric Consumption | |
| | January | 300 | 227.22 | 2000 | 1929 | |
| | February | 300 | 188.90 | 2000 | 1919 | |
| | March | 300 | 211.81 | 2000 | 1875 | |
| | April | 300 | 191.83 | 2000 | 1987 | |
| | | | | | 1939 | |
| | | 1 | | | | |
| | | | | | | |
| | | | | | | |
| | 4.5.2: Efficiency of energy use and use of renewable energy 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. | representative Belitong as date FGV/ 1st 25/0 2nd 24/0 3rd 30/0 As for FGVPM As for FGVPM As for FGVPM | representatives has beer Belitong as date below: FGVAS Ulu Belitst 25/03/2022 2nd 24/06/2022 3rd 30/09/2022 3rd | representatives has been conducted on Belitong as date below: FGVAS Ulu Belitong 1st 25/03/2022 2nd 24/06/2022 3rd 30/09/2022 As for FGVPM Bukit Tongkat B, the last of some properties of the properties of the properties of the second properties of the | representatives has been conducted on quarterly bas Belitong as date below: FGVAS Ulu Belitong 1st 25/03/2022 2nd 24/06/2022 3rd 30/09/2022 3rd 30 | representatives has been conducted on quarterly basis at FGVAS Ulu Belitong as date below: FGVAS Ulu Belitong 1st 25/03/2022 2nd 24/06/2022 3rd 30/09/2022 3rd 30/09/ |



| Criterio | on / Indicator | | | Compliance | | | | | |
|----------|--|---|--|-------------|--------------|------------------|----------|--|--|
| | | October | 300 | 314.49 | 2000 | 1878 | | | |
| | | FGVPM Bukit T | FGVPM Bukit Tongkat B | | | | | | |
| | | Month / Year 2022 | · | | | | | | |
| | | January | January 1743 1641 3849 3775 | | | | | | |
| | | February | 1458 | 1427 | 4090 | 4078 | | | |
| | | April | March 1690 1604 4260 4100 April 1654 1666 4061 4615 | | | | | | |
| | | | May 1468 1551 4161 4493 | | | | | | |
| | | June | | | | | | | |
| | | July | | | | | | | |
| | | August | | | | | | | |
| | | l — • | September1453150639952487October2070211741443754The baseline figure for FGVPM Bukit Tongkat B is as per the budget, which corelate with the FFB budget for the month. | | | | | | |
| | | The baseline fi | | | | | | | |
| 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 - | operations, inc their operation transport and | The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets. | | | | | | |
| | | | | | | | | | |
| 4.5.2.3 | The use of renewable energy should be applied where possible. - Minor compliance - | At the momen estates. | t, there is no | renewable e | nergy been p | oracticed at all | Complied | | |



| Criterio | on / Indicator | | Compliance | | | | |
|----------|---|--|--|---|---|---|----------|
| Criterio | n 4.5.3: Waste management and disposal | | | | | | |
| 4.5.3.1 | All waste products and sources of pollution shall be identified and documented. - Major compliance - | pollu Was 1. 5 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 | utions and deste. The wasted Scheduled Was. Estate Operation of the container of the contai | ocumented in Idea identified as for aste operation — Used paint container of mill — Battery exaste operation — Used to the idea idea idea idea idea idea idea ide | dentification of So billows: I PPE, Empty pe r, used lubricant, p, Electronic device yre, scrap iron, er er, Plastic, domest | mpty fertilizer bags | 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 - | Ider mar 4.5. Sam | ntification of nagement pla 3.1 above. nple taken at ows: | Source and Typen as described | pe of Waste Forn below. This is a congkat B and FGV | ocumented in the nat. Details of the continuation of the 'AS Ulu Belitong as n Plan Recycle | Complied |



| Criterio | on / Indicator | | | Assessme | ent Findings | | Compliance |
|----------|--|-------------------|---|---|--|---|------------|
| | | 1 | Fertilizer bag | Land | Reuse wherever applicable | Collect and disposed to licensed contractor | |
| | | 2 | Paper | Reduce in Natural resources | Reuse wherever applicable | Collect and disposed to licensed contractor | |
| | | 3 | Empty Chemical Container | Water and Land | Reuse wherever applicable | Collect and disposed to licensed contractor | |
| | | 4 | Tyre | Air, Land, Water | | Collect and disposed to licensed contractor | |
| 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. | che Mar Bhd | micals being nagement De under Docu | established by partment, Felda ument Number | Plantation Sustai Global Ventures P | nandling of used inability & Quality lantations (M) Sdn Revision 0 dated | Complied |
| | - Major compliance - | serv | ricing vehicle | were disposed | | tion except from FAS Headquarters as follows: | |
| | | SW | <u> </u> | Date Generate | Date disposed to PPTR | No of days from generated | |
| | | 410 | | 28/02/2022 28/02/2022 | 12/08/2022 12/08/2022 | 165 165 | |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|---|--|--------------------------|
| | | For vehicle maintenance, the estate has appointed Aeroline Engineering Enterprise to conduct the services. The waste generated from the activity were collected and disposed by the contractors. Seen, the approval granted by DOE under 2nd Schedule for SW 305 under file reference No: AS[B]J95/130/100/536 As for FGVPM Bukit Tongkat B, the schedule waste being disposed to the collection center at FGV Maokil 06. Latest disposal was on 20/10/2022 for the following items: - No SW Code Name Date Generated Quantity 1 409 Chemical Container 19/05/2022 10 unit 2 409 Glove 19/05/2022 0.9 kg 3 409 Mask 3M 3311 & N95 01/06/2022 0.7 kg 4 409 Safety Helmet 28/06/2022 6 unit 5 409 Apron 12/07/2022 0.3 kg All the disposal are within the Regulatory timeframe of 180 days. | |
| 4.5.3.4 | Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers. - Major compliance - | Empty Chemical Containers were sold to recycle vendors and the record being documented in Borang Pemulangan, Kitar Semula dan Bilasan 3 kali Bekas Racun Perosak. The empty chemical containers being triple rinsed and send to Felda Maokil. | Complied |
| 4.5.3.5 | Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance - | FGVAS Ulu Belitong, domestic waste was disposed in designated landfill located at field Peringkat 1 blok 5. For FGVPM Bukit Tongkat B domestic waste were disposed in designated landfill located at field PM 00G block 1. Sighted only domestic waste were disposed at both landfills. | Minor Non Conformance |



| Criterio | n / Indicator | Assessment Findings | Compliance |
|----------|--|---|------------|
| | | Minor NC Land fill application is not as per procedure Procedure: Pengurusan Sisa pepejal (FGVPM/L2/PAS-02) Rev:01, Date: 23/01/2020) Clause 6.1.1.1.1 Mestilah 500meter dari anak anak sungai, kedudukan tapak pelupusan mestilah berada dalam sekitar >500 m dari Kawasan penempatan penduduk. During the site visit to the land fill areas as the following: 1. Ulu Belitong Estate – 1.93764, 103.47327 2. Bukit Tongkat B Estate – 1.94577, 103.48104 It was verified through google earth that the location of the residential is within 500 m from both of the landfill point. | |
| 4.5.4.1 | An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance - | The polluting activities has been assessed during environmental aspect and impact assessment. The EAIA assessment findings including list of polluting sources are recorded in document titled "Environmental Aspect & Impact Assessment (EAIA) & Environmental Management Plan (EMP) & Waste Management plan (WMP). Identification of significant pollutants and greenhouse gas (GHG) emissions also be monitored through Approved GHG calculator, Palm GHG on Land conversion, Emissions from Fertilizer, Emissions from peat, Fuel Consumption, and crop sequestration. | Complied |
| 4.5.4.2 | An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance - | Details of action plan for identified pollutants as shown below and is a continuation from the 4.5.4.1 above. Emission Source Action Frequency Responsibility | Complied |



| Criteri | on / Indicator | Assessment Findings Complian | | | | | | |
|----------|---|--|--|-----------------------------|----------------------|---------------------------|--|--|
| | | Dark Smoke | | | | | | |
| | | Noise | Office – printing of paper | To provide sound level test | As and when required | Manager/ Assistant/ CC | | |
| | | Air Pollutant | Manager/ Assistant/ Foreman | | | | | |
| Criterio | on 4.5.5: Natural water resources | | | | | | | |
| 4.5.5.1 | The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate. | focusing stated to each plate the state of t | focusing on water shortage, fire incidence and flood. In the plan stated the root cause, mitigation plan and Person in Charge for each plan. | | | | | |



| Criterion / Indicator | | Asses | sment Finding | s | Compliance |
|--|----------|--|--|---|------------|
| e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. - Major compliance - | | analysis was conducted of Bhd. Laboratory. The re Ph BOD COD Total Solid Ammoniacal Nitrogen Dissolved Oxygen For FGVPM Bukit Tongko | on 29/10/2021 by sult as follows: The Inlet 6.1 1 3 27 0.1 8.36 at B Estate, this is Inlet | FGV Agri Services Sdn. e result as follows: Outlet 6.6 1 2 25 0.1 8.24 the following result: Outlet | Compliance |
| | c) d) | pH BOD COD Total Suspended Solid Ammoniacal Nitrogen Dissolved Oxygen Estate have monitored to optimize their water usa Protection of water cour [Ref.: Pengenalpastian 1A/L2- Pr8(0), Revision of area for both estates where the palma application were erected agrochemical usage was | 5.3 1.0 2 14 0.1 7.97 heir water manage ge and reduce wase is guided by its Kawasan Cerun do, 01/06/2016)]. Sisited were demand Signboard on pull at the buffer zon- | 5.9 1.0 9 19 0.7 7.84 ement plan in order to stage. established procedure an Rizab Sungai [ML-ighted the buffer zone reated with white and rohibition of chemical | |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | | e) There is no removal of natural vegetation at riparian reserve area.f) No using of bore well as water source. | |
| 4.5.5.2 | No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance - | No construction of bunds, weirs and dams across at Sungai Penggeli at Bukit Tongkat B Estate and Sungai Belitong at Ulu Belitong Estate. | 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 - | All estates did the roadside drains in terrace area to store water. During site visit to estate, sighted in terrace area the implementation of roadside drains. The roadside drain well maintained by Estate Management. | Complied |
| Criterio | n 4.5.6: Status of rare, threatened, or endangered species and | l 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 - | Laporan Biodiversiti Ladang FGVPM Bukit Tongkat B was last updated on 24/01/2018 by Muhd Zulfadzli B Sufian Suri. Based on the report, the estate is located next to Kluang Forest Reserve and 16.45 hectare being identified as non-plantable steep areas at PM00H. Based on the HCV Assessment report, there are no Rare, Threatened and Endangered species identified in the plantation. Appropriate measure such as setting up electric fencing at the estate's boundary to prevent encroachment of elephant was applied at FGVPM Bukit Tongkat B. Biodiversity report for FGVAS Ulu Belitong was last updated on 25/01/2018. There are no Rare, Threatened and Endangered species identified in the plantation. | Complied |
| 4.5.6.2 | If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management | Signage was installed within estate and boundary nearby to ensure no illegal hunting activities occurred within estate field area. | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | planning and operations should include: | Awareness was given from time to time to all workers and to external | |
| | a) Ensuring that any legal requirements relating to the protection of the species are met. | stakeholders to discourage such activities and to prohibit trespassing to conserved areas. | |
| | b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. | | |
| | - Major compliance - | | |
| 4.5.6.3 | A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. | Management plan was established with implementation of monitoring records using a logbook entitled: | Complied |
| | - Major compliance - | 1. Monitoring of Wildlife | |
| | | 2. Monitoring of Buffer Zone | |
| | | 3. Monitoring of Boundary Stone | |
| Criterio | n 4.5.7: Zero burning practices | | |
| 4.5.7.1 | Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. | Sighted under Group Sustainability Policy [FGV/SED/POL/001, rev. 3, 29/5/2019 under 5.3.6 No open burning or use of fire in all FGV Group. | Complied |
| | - Major compliance - | No replanting programme in the Estate. | |
| 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. | Visit to the estates within estates confirmed that no previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop hence, no special approval been obtained so far. Hence this requirement is not applicable. | N/A |
| | - Major compliance - | | |
| 4.5.7.3 | Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) | Since no special approval been obtained so far for burning, hence this requirement is not applicable. | N/A |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | (Open Burning) Order 2003 or other applicable laws Major compliance - | | |
| 4.5.7.4 | Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance - | All the previous palms shall be felled, chipped and windrowed as stated in the Agriculture Manual. Based on site visit at several fields at the sampled estates, there was no trace of open burning observed. | Complied |
| 4.6 Prin | ciple 6: Best Practices | | |
| Criterio | n 4.6.1: Site Management | | |
| 4.6.1.1 | Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance - | FGV Holdings Berhad has established mechanism to monitor the implementation of their procedure by Mill/Plantation Advisor Visit, Agronomist Visit, Mill Quality Control Unit and Audit on compliance to SOP (P&D). The visit conducted on annually basis. FGV Plantation Sdn Bhd has established various SOPs such as found in the Masterlist as below: Integrated Management System FGV/FGVPM/I/IMS/15/001 till FGV/FGVPM/I/IMS/15/0024 Environmental Procedure FGVPM/L2/PAS-01 till FGVPM/L2/PAS-09 Safety Guidelines FGVPM/L3/GPK-001 till FGVPM/L3/GPK-036 Sustainability Procedure FGV/ML-1A/L2-Pr10, Pr12, Pr14, Pr17, Pr22 and etc. | Complied |
| 4.6.1.2 | Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to | In FGVAS Ulu Belitong and FGVPM Bukit Tongkat B, Soil Conservation measure implemented to prevent soil erosions as well as siltation of | Complied |



| Criterio | on / Indicator | Assessment Findings Compliance |
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| | 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 - | drains and waterways. As in Sustainability Manual (MLSL (EWd.3) Sec 2(11.0) Dated 01/09/17 explain conservation such as terracing, planting cover crop such as Mucuna Bracteata, Calopogonium Mucunoides and Pueraria Javanica. |
| 4.6.1.3 | A visual identification or reference system shall be established for each field. - Major compliance - | Sighted field marking during site visit at Block 18 (Peringkat 3) FGVAS Ulu Belitong. In FGVPM Bukit Tongkat B the marking and reference system sighted at field under PM00G/00H, PM06J/07M, PM10N/11Q, PM14T. |
| Criterio | n 4.6.2: Economic and financial viability plan | |
| 4.6.2.1 | A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance - | Sighted budget for FY 2022, 2023, 2025, 2026 prepared as guidance for future planning. The business plan contains FFB yield, CPO, OER, and KER, costs of production, milling utilization, FFB pricing etc as sighted in FGVAS Ulu Belitong. FGVPM Bukit Tongkat has established Business Management Plan/Budget for Year 2022, 2023, 2024 and 2025. Similarly the business plan contains FFB yield, CPO, OER, and KER, costs of production, milling utilization, FFB pricing etc. |
| 4.6.2.2 | Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance - | FGVAS Ulu Belitong found available for long term annual replanting programme (2020-2030). Currently crop planted (Peringkat 1 in 2011), (Peringkat 3 in 2007). No replanting plan in the next 5 years. In FGVPM Bukit Tongkat B, found documented long term Annual Replanting Programme (2022-2027) as below: Location Ha 2022 2023 2024 2025-2027 PM00G 46.44 - 46.44 - - PM00H 69.37 - 69.37 - - |



| Criterio | on / Indicator | Assessment Findings Compliance |
|----------|--|---|
| | | Total 115.81 - 115.81 |
| 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 - | IN FGVAS Ulu Belitong and FGVPM Bukit Tongkat maintain and documented Business/Management Plan (2022-2026) included: • Crop projected • Upkeep and maintenance cost • Harvesting cost • Other cost (including admin, sales, levy and etc.) • Price forecast and profit and loss. |
| 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 - | Sighted record and date monitored on FFB produced in 2022 for FGVAS Ulu Belitong from Month of Jan-Oct 2022. For Peringkat 1 & 3 targeted at 20.43 MT/Ha and achievement recorded at 26.29 MT/Ha. |
| Criterio | n 4.6.3: Transparent and fair price dealing | |
| 4.6.3.1 | Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance - | All the rate and pricing mechanism have been clearly stated in the agreement as sampled with Masaki Enterprise Sdn Bhd and Zaidan Joyo Enterprise. |
| | | FGVPM Bukit Tongkat to Belitong POM (13 KM) = RM 29/MT |
| | | FGVPM Bukit Tongkat to Penggeli POM (30 KM) = RM 34//MT |
| | | FGVPM Bukit Tongkat to Belitong POM (8 KM) = RM 32/MT |
| | | FGVPM Bukit Tongkat to Penggeli POM (36 KM) = RM 42/MT |
| 4.6.3.2 | All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. | A fair contract documented as verified, payment made as Certificate No. 09/2022 (SEPT) for Bukit Tongkat Enterprise. Payment made for Loading and Transport FFB from Peringkat 1 & 3 with details of |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | - Major compliance - | payment, deduction ant net payment. Verification made with FFB Sold to Ulu Belitong POM Report for September 2022. Peringkat 1 (191.72 MT) and Peringkat 3 (94.01 MT) found tally with amount of payment made. In FGVPM Bukit Tongkat B, Payment Certificate for Agriculture Work Contract made to Masaki Enterprise Sdn. Bhd. according for transportation of FFB to mill as agreement dated 31/07/22. | |
| Criterio | n 4.6.4: Contractor | | |
| 4.6.4.1 | Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance - | FGVAS Ulu Belitong has engaged a contractor (Bukit Tongkat Enterprise). Sighted a letter from the contractor mentioned that they understand on MSPO requirements and will comply with the requirements including legal requirements dated 07/01/21. Available another documented letter from FGV Agri Business Sdn Bhd dated 21/10/20 to all contractor on "Reminder to comply with legal requirements, term of work for FFB Transported which signed by CEO and endorsed signed by Bukit Tongkat Enterprise representative. | Complied |
| 4.6.4.2 | The management shall provide evidence of agreed contracts with the contractor. - Major compliance - | Available contract agreement (Surat Perintah Kerja) between Bukit Tongkat Enterprise (Contractor) and FGV Agri Services for No. 820105001-2021/820231503-10-111 dated 28/10/21 for job with Stesen FGVAS Ulu Belitong (Peringkat 1-3) to provide all necessary manpower, transportation for loading and transport FFB to Ulu Belitong POM estimated at 3,478.43 MT. Job to be perform between 01/01/22-31/12/22. In FGVPM Bukit Tongkat available a document of contract as below: | Complied |
| | | Zaidan Joyo Enterprise Contract No. 5300007493 | |



| n / Indicator | Assessment Findings | Compliance |
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| | Job: Transportation of FFB to Belitong POM & Penggeli POM for period of 1 year at PM00G, PM00H, PM10N, PM11Q including loading. Period: 01/06/22-31/05/23. Masaki Enterprise Sdn. Bhd. Contract No. 530007915 Job: Transportation FFB to Belitong POM & Penggeli POM for period of 1 year at PM06J, PM07M, PM14T including loading. Period: 01/08/22-31/07/23. Both parties from Regional Controller, Wilayah Mersing and Contractors's representative signed the contract accordingly. | |
| The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance - | FGV Holdings Berhad has agreed for BSI auditors to verify the assessment through a physical inspection if required. | Complied |
| 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. - Major compliance - | Sighted "Sijil Bayaran Kontrak" under FGVAS Stesen Bukit Besar, Kulai (Peringkat 1-3 Ulu Belitong) for Contract No. 820105001-2021/820231503-10-111 for period 01/01/22 to 31/12/2022 to contractor (Bukit Tongkat Enterprise). Certificate No. 09/2022 contained statement from Supervisor and Executive dated 02/10/22 that all work has been performed as per contract term and condition and as per work area performed. Station Manager endorsed that he has checked and verify all work done and quality completed as required for payment to be released. In FGVPM Bukit Tongkat B, sighted Job Completion Certificate (C/002/2012 LAMP 4.4 FGVPM-C02 Pnd 1) for payment of September | Complied |
| | assessments through a physical inspection if required. - Minor compliance - 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. | period of 1 year at PM00G, PM00H, PM10N, PM11Q including loading. • Period: 01/06/22-31/05/23. Masaki Enterprise Sdn. Bhd. • Contract No. 530007915 • Job: Transportation FFB to Belitong POM & Penggeli POM for period of 1 year at PM06J, PM07M, PM14T including loading. • Period: 01/08/22-31/07/23. Both parties from Regional Controller, Wilayah Mersing and Contractors's representative signed the contract accordingly. The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance - 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. - Major compliance - Major compliance - Sighted "Sijil Bayaran Kontrak" under FGVAS Stesen Bukit Besar, Kulai (Peringkat 1-3 Ulu Belitong) for Contract No. 820105001-2021/820231503-10-111 for period 01/01/22 to 31/12/2022 to contractor (Bukit Tongkat Enterprise). Certificate No. 09/2022 contained statement from Supervisor and Executive dated 02/10/22 that all work has been performed as per contract term and condition and as per work area performed. Station Manager endorsed that he has checked and verify all work done and quality completed as required for payment to be released. In FGVPM Bukit Tongkat B, sighted Job Completion Certificate |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | | Manager) that all job requirements were conducted as agreed and payment to be made accordingly. | |
| 4.7 Prin | ciple 7: Development of new planting | | |
| Criterio | n 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 - | There is no development of new planting at both visited estates. | N/A |
| 4.7.1.2 | No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance - | There is no development of new planting at both visited estates. | 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 - | There is no development of new planting at both visited estates. | N/A |
| Criterion | 4.7.3: Social and Environmental Impact Assessment (SEIA) | | |



| Criterio | n / Indicator | Assessment Findings | Compliance |
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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 - | There is no development of new planting at both visited estates. | N/A |
| 4.7.3.2 | SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance - | There is no development of new planting at both visited estates. | N/A |
| 4.7.3.3 | The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance - | There is no development of new planting at both visited estates. | N/A |
| 4.7.3.4 | Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance - | There is no development of new planting at both visited estates. | 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 - | There is no development of new planting at both visited estates. | N/A |
| 4.7.4.2 | Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads | There is no development of new planting at both visited estates. | N/A |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | 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 - | There is no development of new planting at both visited estates. | 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. | There is no development of new planting at both visited estates. | N/A |
| | - Major compliance - | | |
| 4.7.5.3 | Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance - | There is no development of new planting at both visited estates. | 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 - | There is no development of new planting at both visited estates. | N/A |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| 4.7.6.2 | Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance - | There is no development of new planting at both visited estates. | 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 - | There is no development of new planting at both visited estates. | 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 - | There is no development of new planting at both visited estates. | N/A |
| 4.7.6.5 | Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance - | There is no development of new planting at both visited estates. | 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 - | There is no development of new planting at both visited estates. | N/A |
| 4.7.6.7 | The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance - | There is no development of new planting at both visited estates. | N/A |



| Criterio | n / Indicator | Assessment Findings | Compliance |
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| 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 - | | N/A |



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

| Criterion / Indicator | | Assessment Findings | Compliance |
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| 4.1 Prin | ciple 1: Management commitment & responsibility | | |
| Criterio | n 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy | | |
| 4.1.1.1 | Policy for the implementation of MSPO shall be established Major compliance - | Sighted Sustainability Policy (FGV/SED/POL/003) Rev.03 under FGV Holdings Berhad signed and approved by Mohd Nazrul Izam Mansor (Group CEO) dated 26/01/22. | 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 - | The Sustainability Policy mentioned above contained information and commitment to comply with policy, procedure, legal and other requirements. Also included commitment to sustainability or continual improvement. | Complied |
| Criterio | n 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 was planned and conducted by Akhmal Hakim Adnan and Hilmie Zaifruenz Bakhri on 10-11/10/22 as sighted in a checklist for Sustainability Internal Audit 2022. | Complied |
| 4.1.2.2 | The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance - | FGV Holdings Berhad has established SOP for Internal Audit and documented in Internal Audit Procedure, document no. FGV/GSD-SCCD/SOP/04 Version: 0.0, dated 03/09/2020. Sighted Action Plan for the internal audit findings, and the NC closure. | Complied |
| 4.1.2.3 | Reports shall be made available to the management for their review. - Major compliance - | The internal audit report was documented and made available for management review. As evidence, all findings from internal audit was responded by Mill Management within the timeframe stipulated | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | | in the Audit Procedure. Available document titled Evaluation Form and Commitment of Project Owner for Sustainability Audit Programme issued by Auditor to Mill Sr. Manager that stated commitment to take necessary action for audit findings raised. | |
| Criterio | n 4.1.3 – Management Review | | |
| 4.1.3.1 | The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance - | Management Review was conducted as evidence of Minutes of Management Review Meeting conducted on 24/10/22 and attended by 14 staff included Mill Manager, Assistant Managers, CC and others as attendance list. Among discussed included: • Internal Audit results • Customer Satisfaction • FFB Processed • Social • MSPO related issues and improvement activities. | Complied |
| Criterio | n 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 - | FGVPI Belitong POM has established an Continual improvement Plan activities FY 2022. Among activities listed: Monitoring emission of Dark Smoke (Opacity) Boiler 1 (<40%) actual 10.35% Monitoring emission of Dark Smoke (Opacity) Boiler 2 (<40%) actual 7.15% EFB sent to FGV estates (4,000MT) actual 2,368.72 MT BOD of final effluent discharge (<20 mg/L) actual ok as analysis report verified. | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | | Recycling programme (scrap metal, used paper) (<50 MT) actual 26.47 MT. | |
| 4.1.4.2 | The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance - | As observed in Office and mill operation area in FGVPI Belitong POM, Kaizen activity such as 5'S has been effectively implemented to enhance housekeeping, layout and systematic storage of files, equipment, supplies, chemicals and others. Notice board has been used effectively to disseminate information and providing guidance of good practices. 5'S Briefing was conducted during assembly as evidence from attendance list dated 29/06/22, 04/07/22. | Complied |
| 4.2 Prin | ciple 2: Transparency | | |
| Criterio | n 4.2.1 – Transparency of information and documents relevant | to MSPO requirements | |
| 4.2.1.1 | The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance - | Adequate information covering on environmental, social and legal issues which are relevant to stakeholders is shared for effective participation and decision making. Handbook of RSPO Certification for FELDA and FGV were distributed to all the stakeholders. Explanation of RSPO, MSPO, ISCC and all the policies were clearly stated in the handbook. Besides, process of complaints and grievances were included in the handbook. Sampling on communication between FGV and stakeholder regarding to availability of public document dated 03/10/2022. From the letter 13 Document was available for public. Sampling the records of inspections and visits by the authorities were maintained such as inspection of electricity by competent engineer, DOE visits and DOSH visits. | Complied |
| 4.2.1.2 | The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where | | Complied |



| Criterio | n / Indicator | Assessment Findings | Compliance |
|--|--|--|------------|
| | disclosure of information would result in negative environmental or social outcomes. - Major compliance - | 03/10/2022. Besides, all the information such as annual report, sustainability news and policies were found available in the company's website: www.fgvholdings.com | |
| Criterion | 4.2.2 – Transparent method of communication and consultation | on | |
| 4.2.2.1 Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance - | | FGV Holdings Berhad has developed "Menangani Aduan dan Rungutan" procedure (Doc. No.FGV/ML-1A/L2-Pr13) issue no: 2 dated 01/04/2019) where the procedure has stated the information that provided to the stakeholders such as policies, social impact assessment and environment aspects. FGVPI Belitong POM has conducted the stakeholder meeting through JPPK Belitong dated 19/9/2022. The meeting was used to communicate the procedure of complaints to external stakeholders, together with explaining the MSPO and RSPO requirements. | Complied |
| 4.2.2.2 | The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance - | FGVPI Belitong POM has appointed four personel for the communication and social person in charge, appointment has been made on 04/07/2022 (Ref No: (50)4056/BLT/830/1.pt.2). The name is as the following: 1. Muhammad Qayyum Akmal Bin Jefri 2. Mohammad Khabib Bin Khalid 3. Mohd Ikhwan Khozairi Bin Mohd Khoiri 4. Norafiza Binti Shabur Zahari | Complied |
| 4.2.2.3 | A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. | The stakeholder list was last updated on 02/01/2022 where internal and external stakeholders have been included in the list. | Complied |
| | - Major compliance - | | |



| Criterio | n / Indicator | Assessment Findings | Compliance |
|----------|---|---|------------|
| Criterio | 1 4.2.3 – Traceability | | |
| 4.2.3.1 | The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance - | FGV Holdings Berhad has established Standard Operating Procedure on Supply Chain, SOP No: FGV/GSD-SCCD/SOP/007 Version:1.0 dated 07/01/2021 and Prosedur, Sistem Pengurusan Kualiti, Keselamatan, Kesihatan Pekerjaan dan Alam Sekitar dated 08/06/2018. The mill is receiving FFBs from own estates and outsourcing suppliers. The Manual Operasi and Prosedur, Sistem Pengurusan Kualiti, Keselamatan, Kesihatan Pekerjaan dan Alam Sekitar has outlined the traceability process flow as below: - a. Raw Material Reception: Security Guard House & Weighbridge Station b. Production & Storage: Production Unit and Storage Tanks c. Sales & Despatch: Products to Customer(s) Sample taken on Raw Material Reception - Estate FFB Delivery • Date: 20/10/2022 • Estate: FASSB Ulu Belitong • MPOB License: 5035540902000 • DO No: 03130 • Vehicle No: JUJ 9654 • Gross Wt: 10,540 kg • Tare Wt: 4,036 kg • Net Wt: 6,250 kg | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|---|---|--------------------------|
| 4.2.3.2 | The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance - | The Management team holds the responsibility on regular inspection of traceability system. Periodical inspections also being conducted through Regional Controller, Internal Audit and Mill Advisor visit. The effectiveness of the monitoring will evidence in the internal audit and visit report findings. | Complied |
| 4.2.3.3 | The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance - | En Khairul Bin Moh Sazali as the person in-charge of traceability vide letter dated 05/09/2022 approved by Mr Misran Bin Emam, Mill Manager. Refer letter Ref No: (60)4056/BLT/830/1.pt2. | Complied |
| 4.2.3.4 | Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance - | Purchases and sales will base on demand and has agreeable documentation with the supplier. As evidence, records of sales, delivery, or transportation of FFB being well maintained at the Mill. As at to-date, there has been no CPO or PK sold as MSPO certified. | Complied |
| | | Monthly summary of storage, sales, delivery or transportation of crude palm oil and palm kernel reported to MPOB via http://www.e-kilangmpob.com.my/ekilangmain/ (Monthly Mill Statement) | |
| 4.3 Prin | ciple 3: Compliance to legal requirements | | |
| Criterio | n 4.3.1 – Regulatory requirements | | |
| 4.3.1.1 | All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance - | Belitong POM, the lists of permits/licenses which has to be monitored and updated periodically include: 1. MPOB License no. 500170904000. For sell and move, store and | Major Non Conformance |
| | - Major Compilance - | Por Belicense no. 300170904000. For sen and move, store and processing. Validity period from 01/04/2022 - 31/03/2023 DOE's Compliance Schedule no. JPLP/PUB/19/005359 Kilang Sawit Belitong for contradiction License no. 005403. Validity period from 01/07/2022 - 31/12/2022 | |



| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|--|------------|
| | 3. DOE's Compliance Schedule No: JAS.JHQ.600-3/1/5(07) Validity 01/07/2022 to 30/06/2023 | |
| | 4. River Water Detour and Abstraction license No. 08/A/Klg/016. Validity period from 23/01/2022 - 31/12/2022 | |
| | 5. Permit for Schedule Control Goods (Diesel and Petrol), permit no. BPGK JH (KLU) 1193. Validity period from 31/07/2021 -1 28/07/2024 | |
| | 6. Private Installation License no. 54059. Validity period from 27/04/2022 – 26/04/2023 | |
| | The management has keep all machinery license valid. Sample as the following: | |
| | 1. Pengandung Tekanan Tak Berapi - PMT JH/22 166645 - Expired date 05/05/2023 | |
| | 2. Perakuan Kelayakan Mesin Angkat - PMA JH/22 165899 Expired date 05/05/2023 | |
| | 3. Perakuan Kelayakan Dandand - PMD JH/22 182909 - Expired date 11/03/2023 | |
| | Major NC | |
| | The operation of the mill does not fully compliant with legal requirement. | |
| | Water abstraction above the limit set in the Lesen Melencong atau | |
| | Mengabtrak Air (License No. 08/A/Klg/016. Validity period from 23/01/2022 - 31/12/2022). Verified that the approval from the | |
| | license clause 6, the approval set in the clause 6, it is mentioned | |
| | that the premise maximum abstraction is 600 m ³ . However, sighted in the water consumption sample for the month of October 2022. | |



| Criterion / Indicator | | Assessment Find | lings | Compliance |
|-----------------------|-----------------------------|---|---------------------------------------|------------|
| | Verified that reading is as | there are 15 days record the per below: | at are above 600 m ³ . The | |
| | Date | Water Consumption (m ³) | | |
| | 3 | 630 | | |
| | 6 | 620 | | |
| | 10 | 640 | | |
| | 11 | 770 | | |
| | 13 | 670 | | |
| | 15 | 680 | | |
| | 16 | 750 | | |
| | 17 | 760 | | |
| | 18 | 880 | | |
| | 19 | 630 | | |
| | 22 | 690 | | |
| | 23 | 820 | | |
| | 25 | 750 | | |
| | 27 | 970 | | |
| | 29 | 840 | | |
| | 30 | 680 | | |
| | 31 | 1010 | | |
| | | Safety and Health Regulatio | | |
| | | is required to work at a pla | | |
| | | I a distance of more than | | |
| | | ensure his safety and s nclude the use of safety belt | | |
| | | ed, that during removing of removing is we precing the FFB netting is we ppE. | | |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|---|--|------------|
| | | Leachate from EFB stockyard was found to be flowing to the nearest monsoon drain which eventually goes to the environment through "Takungan Alur Air Hujan No. 2". There was also no roof to protect the EFB stockpile from rainwater. This is not in-line with the DOE's compliance schedule of License #006384, Clause 13, which refers to the "Garis Panduan Pelan Pengurusan Tandan Kosong Kelapa Sawit" (Guideline for Oil Palm Empty Fruit Bunch Management), Clause 4.0 Thus, Major non conformance has been raised. | |
| 4.3.1.2 | The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance - | The applicable laws identified were listed in Register of Legal and Other Requirements (Daftar Perundangan dan Lain-lain Keperluan), document no. FGV/GSD-SR/LR001. Latest review was conducted on 01/11/2022. The sample of Act and Legal as listed as follows: 1. OSHA 1994 2. FMA 1967 3. Pesticide Act 1974 4. Electrical Supply (Amendment) Act 2015 5. Fire Services Act 6. Environmental Quality Act 7. Minimum Wages Order 2022 | 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 - | FGV Holdings Berhad have centralised system for tracking any changes in the law as per "Panduan: Sistem Pengesanan Perubahan Undang-undang" dated 23/6/2015, Version:04. Any changes in the relevant regulations is through Plantation and Sustainability Department and the Manager, who are sole responsible. | Complied |



| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| 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 - | Norafiza Binti Shabus Zahari has been appointed as Legal Compliance and Monitoring Officer dated 01/06/2022 (Ref No: (45)4056/BLT/840A/13). | Complied |
| Criterio | n 4.3.2 – Lands use rights | | |
| 4.3.2.1 | The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance - | The mill land is legally owned by Felda Palm Industries Sdn Bhd as verified the land title No. PTD 8773 and PTD 8774. There was no land dispute in the Belitong POM by verified through interviewed with the stakeholders. | 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 - | The mill land is legally owned by Felda Palm Industries Sdn Bhd as verified the land title No. PTD 8773 and PTD 8774. There was no land dispute in the Belitong POM by verified through interviewed with the stakeholders. | Complied |
| 4.3.2.3 | Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance - | FGVPI Belitong POM leased the land from FELDA and FELDA leased all the land directly from the government. There were no issues of land disputes recorded. All documentation regarding the lease were kept in the office and available for review. Legal boundary along the mill were clearly demarcated with fences. | 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). | There is no land dispute in the FGVPI Belitong POM at the time of audit. The lands are belonging to FELDA – Ulu Belitong Scheme by verified through the agreement. The surrounding is owned by settlers. There was no encroachment of land by the Belitong POM. | N/A |
| | - Minor compliance - | | |



| 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. | The mill land is legally owned by Felda Palm Industries Sdn Bhd as verified the land title record. The existing land is not encumbered by any customary land rights. | N/A | |
| | - Major compliance - | | | |
| 4.3.3.2 | Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance - | The mill land is legally owned by Felda Palm Industries Sdn Bhd as verified the land title record. The existing land is not encumbered by any customary land rights. | N/A | |
| 4.3.3.3 | Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance - | The mill land is legally owned by Felda Palm Industries Sdn Bhd as verified the land title record. The existing land is not encumbered by any customary land rights. | N/A | |
| 4.4 Prince | ciple 4: Social responsibility, health, safety and employn | nent condition | | |
| Criterio | 1 4.4.1: Social Impact Assessment (SIA) | | | |
| 4.4.1.1 | Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance - | SIA was conducted on 06/12/2020 for Belitong POM. Stakeholders such as workers, contractor, drivers, suppliers and external stakeholders were participated in the assessment. Positive and negative impacts have been recorded in the SIA Management Plan. | Complied | |
| | | Social management plan for FGVPI Belitong POM sighted with 3 negative issues that has been highlighted from SIA assessment report and all issues has been highlighted as completed or continuous. | | |
| Criterion | 1 4.4.2: Complaints and grievances | | | |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|---|--|------------|
| 4.4.2.1 | A system for dealing with complaints and grievances shall be established and documented. - Major compliance - | FGV Holdings Berhad has developed procedure of dealing with complaint and grievances. Refer SOP: FGV/ML-1A/L2-Pr13 Issue No. 2 Rev. 02 dated 01/04/2019. The objectives of the procedure are to provide a channel for the internal stakeholders and external stakeholders to lodge any complains to the management. Mechanism to handle complaints was clearly described in the procedure. The time frame for investigation of the issue should be done within 14 working days. Refer Section 9 Carta Alir Proses Aduan. | Complied |
| 4.4.2.2 | The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance - | Belitong POM has implemented Complaint and Response Form/ Book to record complaints or requests from the stakeholders. Most of the complaints were about defects of housing facilities. Based on the records of complaints lodged, the actions taken by the management were appropriate and timely 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 complaint record book was available in the office area where the stakeholders can easily access to lodge their complaint. | 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 - | From the interview with internal and external stakeholder during stakeholder consultation found that they were aware of the complaint procedure and were briefed by the management during stakeholder meeting. The record of complaint record was as available in Mill record. | 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. | Sighted the record of complaint is available in the mill, the records of complaint is kept for more then 24 months. | Complied |
| | - Major compliance - | | |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| Criterio | n 4.4.3: Commitment to contribute to local sustainable develop | ment | |
| 4.4.3.1 | Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance - | Sighted record of CSR activities for the year of 2022: 1. Jamuan Aldilfitri for the workers 2. Jamuan Ramadhan 3. CSR at the workers quarters 4. Employment of local people nearby. | Complied |
| Criterio | n 4.4.4: Employees safety and health | | |
| 4.4.4.1 | An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. - Major compliance - | OSH Policy (FGV/GHR/HSEQ/POL/003) Rev. 5.0for FGV Holdings Berhad documented, signed and approved by Mohd Nazrul Izam Mansor (CEO) dated 05/11/2021. The policy mentioned statement of commitment to enhance and established safe and healthy operation and workplace. Sighted another OSH Policy under FGV Palm Industries Sdn. Bhd which signed and approved by Abdul Malik b. Sekak (CEO) dated 01/01/21. | Complied |
| 4.4.4.2 | The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: i. All employees involved are adequately trained on safe working practices; | a) OSH Policy was communicated and displayed as observed at notice board in Office of FGVPI Belitong POM and Briefing of Policies conducted during morning muster. Safety and Policies Briefing was conducted on 19/09/2022 b) HIRADC (FGV/PUC-OSH/F1.2 Pind 0) was revised dated on 25/04/22 for Kernal Plant and 01/08/22 for activities in FGVPI Belitong POM such as under FELSCO, Engine Room, Boiler, Water Treatment, Loading, Surau and others. Audiometric Test to be held on 10/11/22 as Surat Perintah Kerja | Major Non Conformance |



| Criterion / Indicator | Assessment Findings | Compliance |
|--|--|------------|
| ii. All precautions attached to products should 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 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 shall 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 that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite. | Bhd for 85 workers of FGVPI Belitong POM. Previous Audit Finding on retest requirement for Kamsani b. Shamsudin (Process Operator) was done at Poliklinik Intan by OHD as Pure Tone Audiometric Test Result conducted dated 01/07/21. Result were normal for both ears and required annual testing, provided PPE and training. During site visit at Electrical Store, it was found that Oxygen and Acetylene Gas Cylinder were placed in the trolly. There is no flash back arrestor installed and the tanks were placed without chained to the trolly. It was not in line with SOP Penggunaan Oxy-Acetylene, FPI-PK-082 dated 14/05/2022 Section 6.1.5, "Pastikan Flash Back Arrester dipasang pada setiap hose" and Section 6.4.2 "Silender tersebut mesti diikat kemas pada troli", Section 6.5.5 "Silender yang disimpan perlu diikat bagi mengelakkan silender tumbang/ terjatuh dan menyebabkan kerosakan pada silender" respectively. While at Electrical Store, it was found that diesel was stored in the two containers without any labelled. It was not in line with SOP Pengurusan Bahan Kimia, FPI-PK-036 dated 14/05/2022, Section 6.5.1: "Bahan Kimia yang di pindahkan ke bekas lain hendaklah di label semula mengikut label asal bagi mengelakkan kekeliruan kepada petugas lain". Thus Major NC was raised. c) Chemical handling training was conducted on 31/10/22 at meeting room of FGVPI Belitong POM and attended by workers and staff that involved with chemicals handling and including | |



| Criterion / Indicator | Assessment Findings | Compliance |
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| j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. - Major compliance - | workers that need to purchase a Safety Boots for them in 2022 covering from top management (Sr. Mill Manager till general workers). Sighted also a PPE issuance records for each individual workers in mill. e) FGV Holdings Berhad has established SOP for Chemical | |
| | Handling and documented in the Safety Operating Procedure, Chemical Handling. Refer doc no. FPI-PK-036, issue no. 3 dated 14/07/2010. Medical surveillance was conducted as Medical Programme 2022 prepared by RZ Intan Medicare Sdn. Bhd as under USECHH 2000. Result stated as surveillance conducted no worker having any symptom of exposure (welding fumes. Mineral Oils and N-Hexane. | |
| | f) Available Organization Chart for SHC 2022 where the composition is Misran b. Emam (Chairman), Mohd Ikhwan Khozair (Secretary), 8 Employees Representatives and 8 Employers Representatives. Available appointment Letter issued to Mohd Ikhwan Khozairi (Asst Manager) as Secretary of SHC dated 07/07/22, Hj Misran b. Emam (Sr. Manager) as Chairman of SHC dated 15/04/22. Other member having Appointment Letter dated 05/07/22. | |
| | g) Regular meeting through SHC was conducted as evidence from Minutes of Meeting of SHC conducted on 26/09/22, 30/06/22, 30/03/22, another one to be held before the end of December 2022. | |
| | h) Sighted the emergency procedure for the Mill. Emergency response plan available in local language (Malay and English). The ERP has been explained to all workers and staffs during training which has been conducted. Emergency response plan include the emergency contact number, and also have | |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | | Guidelines on Accident, Emergency Procedures and Exit routes as well as assembly point in file and pasted on notice board. i) The first aider for the is Mr. Hamidun bin Ahmad (IC No: 620207-XX-XXXX). He is the member of Malaysian Red Crescent Society under membership no: 01-04-0089. The membership will be expired on 31/12/2024. The 1st Aid Box being placed in Office, Effluent, Boiler, Workshop and Staff Office. j) Accident record and statistics were discussed in a quarterly meeting as sighted in Minutes of Meeting of SHC conducted on 26/09/22, 30/06/22, 30/03/22. | |
| Criterio | n 4.4.5: Employment conditions | | |
| 4.4.5.1 | The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees. - Major compliance - | FGV Holdings Berhad has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.0 (B). Respecting Human Right. FGV is committed and support human rights. Communication to the employees was done in various methods such as briefing during morning muster, display on notice boards at workers' hostel and training. Interview with workers showed that they have a good understanding on human rights. | 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 - | FGV Holdings Berhad has established Equal Opportunity Policy Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.2.1 Equality and Non-Discrimination. The company is committed to ensure all the employees are treated equally regardless of race, nationality religion, gender, age and other political opinions. | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | | Interview with the workers showed that no discrimination is being practiced. | |
| 4.4.5.3 | Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance - | FGV Holdings Berhad has established an employment contract for workers. Pay and conditions are documented and are above the Minimum Wage Order 2022. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Sampled of the pay slips for the months of June 2022, August 2022 and October 2022 confirmed that the workers were paid in accordance with Minimum Wage Order 2022. 8 samples were taken for verification and found that all payment of salary is as per the requirement and Minimum Wages Order 2022. Sample taken was as per the interviewed workers: 1. Employee ID: 01213391 2. Employee ID: 01213164 3. Employee ID: 01213167 4. Employee ID: 1211594 5. Employee ID: 1211760 7. Employee ID: 1211760 7. Employee ID: 1211596 | Complied |
| 4.4.5.4 | Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance - | There was permanent contractor engaged by the mill named Hamid Engineering & Enterprise for the job of grass cutting and Kontraktor Idaman Desa Enterprise for the job of begging of empty fruit bunch ash. | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | | The contractor sub the job to other. Sample take for EFB ash begging job is: 1. Kamarulizam Bin Abd Litif 2. Mohd Zaid Bin Ahmad 3. Mohd Ajis Bin Ahmad Offer letters were issued and acceptance of offer were acknowledged, and copies were kept by the workers. This has been verified through interview with workers. The terms and conditions such as salary, termination of employment, annual leave entitlement and probation period were clearly stated in the Contract Agreement dated 01/01/2022. Sighted the Payment Voucher to all the contractor for the job of begging. Refer the payment voucher to Mohd Ajis Bin Ahmad (Voucher No: IDE10/BLT3005, Date: 05/11/2022) | |
| 4.4.5.5 | The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance - | All the recruited workers will be registered in the Human Resource Management System (HRMS) where personal details such as name, nationality, date of employed, job description, wage rate, date of birth, gender and entitlement of public holiday was stated in the biodata form. | Complied |
| 4.4.5.6 | All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records. - Major compliance - | The record Offer letters were issued, and acceptance of offer were acknowledged, and copies were kept by the workers. This has been verified through interview with workers. The terms and conditions such as salary, termination of employment, annual leave entitlement and probation period were clearly stated in the Contract Agreement between FGV Palm Industries Sdn Bhd and Kesatuan | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| | | Pekerja-pekerja FGV Palm Industries Sdn Bhd Semenanjung. The agreement validity period is from 01/01/2022 to 31/12/2024. | |
| | | Sampled of the pay slips for the months of June 2022, August 2022 and October 2022 confirmed that the workers were paid in accordance with Minimum Wage Order 2022. 8 samples were taken for verification, and found that all payment of salary is as per the requirement and Minimum Wages Order 2022. Sample checked was as per the interviewed workers. | |
| | | 9. Employee ID: 01213391 | |
| | | 10. Employee ID: 01213164 | |
| | | 11. Employee ID: 01213167 | |
| | | 12. Employee ID: 1211594 | |
| | | 13. Employee ID: 1211973 | |
| | | 14. Employee ID: 1211760 | |
| | | 15. Employee ID: 1212587 | |
| | | 16. Employee ID: 1211596 | |
| 4.4.5.7 | The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance - | The working hours are recorded using punch card system where the attendance can be verified through the punch card of individual workers. The time enter, break time and exit of work were also clearly stated in the punch card. | Complied |
| | | Sampled of the pay slips for the months of June 2022, August 2022 and October 2022 confirmed that the workers were paid in accordance with Minimum Wage Order 2022. 8 samples were taken for verification, and found that all payment of salary is as per the requirement and Minimum Wages Order 2022 and checking of punch card, verified that the overtime is as per the recorded time. | |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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| 4.4.5.8 | The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. - Major compliance - | Based on the records review of the Punch card of sampled workers it was found that the entry time and exit time which were clearly stated in the punch card, conformed to the terms and conditions stipulated in the collective agreement [ref.: Perjanjian Bersama antara FGV Palm Industries Sdn Bhd dengan Kesatuan Pekerja-pekerja FGV Palm Industries Sdn Bhd Semenanjung], validity 01/01/2022 to 31/12/2024. | 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 - | Documented payslip was distributed to individual workers on the day of payment. Wages and overtime were paid according to the "Punch Card". Total hours of overtime and daily attendance has recorded in the timecard. Sampled of the pay slips for the months of June 2022, August 2022 and October 2022 confirmed that the workers were paid in accordance with Minimum Wage Order 2022. 10 samples were taken for verification and found that all payment of salary is as per the requirement and Minimum Wages Order 2022. Verified that there is multiple deduction of salary is being conducted, of which the approval has been issued to Felda Palm Industries Sdn Bhd, dated 16/01/2005 Ref No: PP3/34/1013. Verified that there is multiple deduction of salary is being conducted, of which the approval has been issued to Felda Holdings Sdn Bhd, dated 15/05/1999 Ref No: PP3/34/0247. Sighted that the letter from Jabatan Tenaga Kerja that mentioned all previous approval shall be continue when changes of Felda Holding Bhd to FGV Holdings Bhd dated 30/10/2018, Ref No; BHG.PU/9/129 Jld 46(57). | Complied |



| Criterio | n / Indicator | Assessment Findings | Compliance |
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| | | All the deduction made in the salary is complying all the conditions stated in Clause 24, Employment Act 1955. | |
| 4.4.5.10 | Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. - Minor compliance - | The management has provided facilities such as mosque, recreational facilities such as futsal field, badminton court and volleyball court to the workers and dependents. Government clinic was available in the complex. The workers will be granted bonus once a year based on performance of the workers. Incentive and allowance were given to the workers as well. | Complied |
| 4.4.5.11 | In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance - | The mill workers housing is provided with basic facilities such as government clinic, football field, mosque, sundry shops and other amenities such as electricity and water supply from government. Line site inspection was carried out in Belitong POM workers housing. Refer Senarai Semak Kebersihan Perumahan Petugas. Last Conducted on 07/11/2022. | Complied |
| 4.4.5.12 | The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance - | FGV Holdings Berhad has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.2.5 Preventing Harassment and Abuse. The company is committed to protect the rights of women on the reproductive and family planning. Gender Committee was developed to provide a system to channel the complaint regarding sexual harassment and violence. The last meeting was conducted on 25/09/2022. There was no issue regarding sexual harassment and violence reported. | Complied |
| 4.4.5.13 | 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 | FGV Holdings Berhad has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: | Complied |



| Criterio | n / Indicator | Assessment Findings | Compliance |
|-----------|--|---|------------|
| | 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. - Major compliance - | 4.0 dated 17/11/2020 section 5.2.2 Upholding Labour Standard. The company allows the employees to join any legal association and get approval from the management. Workers' Committee Kesatuan Pekerja-Pekerja Felda Palm Industries Sdn Bhd was established to discuss issues among the workers. Meeting minutes dated 30/06/2022 was sighted. Issues related to new housing, housing compound maintenance, minimum wages for long services staff and workers were discussed during the meeting | |
| 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. - Major compliance - | FGV Holdings Berhad has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.2.2 Upholding Labour Standard where the company will not recruit any individual who less than 18 years old to work in plantations. Document reviewed on the list of workers confirmed that all the employees were above 18 years old. | Complied |
| Criterior | 4.4.6: Training and competency | | |
| 4.4.6.1 | All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance - | Sighted records of training conducted by FGVPI Belitong POM as kept: Safety and Policies Briefing was conducted on 19/09/20 Safety Briefing, First Aid, Medical and Insurance Coverage was conducted on 17/10/22 and attended by workers from office, grader, electrician, boiler, Shift B. Training for Operation of Hydrocylone Machine was conducted on 03/02/22 Press Station Training was conducted on 08/02/22 Sterilizer Training was conducted on 09/02/22 | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|--|--|------------|
| | | Boiler Training was conducted on 10/02/22 Sexual Harassment Training was conducted on 17/10/22 during morning muster. PPE training was conducted during briefing on 25/07/22 during morning muster. MSPO, Environmental Aspect and Impact, Hazard and Risk and Legal was conducted on 12/10/22 at meeting room to mill staff. | |
| 4.4.6.2 | Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance - | Annual Training Plan 2022 in FGVPI Belitong POM, was created based on Training Needs Analysis for workers involved in the operations. Sighted the Training Need Analysis 2022 of all workers which are based on their competencies and job description under document 'Analisa Keperluan Latihan Petugas dan Pekerja" | Complied |
| 4.4.6.3 | A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure. - Minor compliance - | The management has developed the training programme for the year 2022, and training matrix is available. Training procedure is available for verification | Complied |
| 4.5 Prin | ciple 5: Environment, natural resources, biodiversity and | d ecosystem services | |
| Criterio | n 4.5.1: Environmental Management Plan | | |
| 4.5.1.1 | 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. - Major compliance - | Environmental Policy (FGV/GHR/HSEQ/POL/004) Rev.00 for FGV Holdings Berhad was approved, signed Mohd Nazrul Izam Mansor (Group CEO) dated 05/11/2021. Included a commitment to comply with applicable Environmental legal and other requirements. This | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|--|--|------------|
| | | was posted at notice board as seen near mill office and operation area. | |
| 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 - | Environmental aspect and impact assessment was conducted as sighted in Identification of Environmental Aspect and Evaluation of Significant Form (FPI/L4/QOHSE-1.7 Pind 0) dated 04/04/22 recorded by M. Qayyum Akmal b. Jeffri. Covering activity, product and services: • Empty Bunch Conveyor • Outlet drains | Complied |
| | | Diesel Tank Weight Bridge Canteen Store Laboratory Effluent pond and etc. | |
| 4.5.1.3 | An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance - | As documented in Significant Environmental Aspect and Impact Register Form (FPI/L4/QOHSE-1.8 Pind 0) Year 2022 for FGVPI Belitong POM. In the form Impact Mitigation Method was mentioned such as stopping the mill operation. | Complied |
| 4.5.1.4 | A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance - | EFB/Fibre/Ash send to FGV estate to be used as organic fertilizer. | Complied |
| 4.5.1.5 | An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards | Safety and Policies Briefing was conducted on 21/09/22 during Morning Assembly and attended by staff and workers as attendance list from Office. Lab, Grader, Electrical, Boiler, Shift A & B. | Complied |



| Criterio | on / Indicator | | As | ssessment | Findings | | Compliance |
|----------|---|---|---|----------------------|--|---|------------|
| | achieving objectives Major compliance - | | | | | | |
| 4.5.1.6 | The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance - | of Meetin 01/2022 of Sr, Mill Discussion | Environmental meeting was conducted as evidence from Minutes of Meeting of Environmental Performance Monitoring (EPMC) Bil 01/2022 conducted on 07/10/22 attended by 8 workers included Sr, Mill Manager, Assistant Manager, Foreman, CepSWAM. Discussion done on issues such as environmental quality (discharge to air, water/effluent). Water sampling results, DOE officer visit and etc. | | | Complied | |
| Criterio | n 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 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. - Major compliance - | | Belitong PON FB (Jan-Oct 2 FFB Production (MT) 17,930 10,640 8,940 9,710 12,100 19,760 17,290 21,141 | | Total Diesel Used (LT) 11,845 9,991 6,070 10,197 6,895 9,274 18,325 11,767 | Total Diesel/FFB Production (LT/MT) 0.66 0.94 0.68 1,05 0.57 0.47 1.06 0.56 | Complied |
| | | Sep Oct | 22,430 26,330 | 4,670.34 5,532.05 | 11,139 13,991 | 0.50 0.53 | |
| 4.5.2.2 | The oil palm premises shall estimate the direct usage of non- renewable energy for their operations, including fossil fuel, and | | | | , - | ge as documented. ole energy for their | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|--|---|------------|
| | electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance - | operations, including fossil fuel to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets. | |
| 4.5.2.3 | The use of renewable energy should be applied where possible. - Minor compliance - | Sighted few solar panel lights used at entrance area in FGVPI Belitong POM. | Complied |
| Criterio | n 4.5.3: Waste management and disposal | | |
| 4.5.3.1 | All waste products and sources of pollution shall be identified and documented. - Major compliance - | FGVPI Belitong POM has established and documented Identification of Waste (FAS-RSPOL1/K5.3/5.3.1) among others: Mixed raw effluent Empty Bunches (EFB) Shell from LPTS Used Lubricating Oils (SW 305) Used Filter (SW 410) Used Hydraulic Oil (SW 306) Scrap Iron Boiler Ash and etc. | Complied |
| 4.5.3.2 | A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for: a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill byproducts by converting them into value-added products. | Waste Management Plan established for FGVIP Belitong POM established and documented for FY 2022. Types Items Location Action Scheduled Used Lubricant (SW305), Workshop/ Collect and Store Used Hydraulic Oil (SW306), Clinical Waste (SW404) | Complied |



| Criterio | on / Indicator | Assessment Findings | | | | Compliance |
|----------|--|--|--|---|---|------------|
| | - Major compliance - | | Used Container (SW409) Used Batteries (SW102) | Main Building Electrical & maintenance | i I | |
| | | Domestic Waste | Rubbish | Residential area | Collect every Wednesday Memo no burning Provide Rubbish bin | |
| 4.5.3.3 | 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 - Major compliance - | found proper Store. Previous disparate of Disport CN No: 0908 Driver Zainal Type: SW410 Qty: 134 Kg Date of Disport CN No: 0908 Driver: Zainal Type: SW110 Qty: 16 Kg | osal: 26/08/22 848-0010008 I Abidin Ibrahim (JJY679) 0 (Contaminated Rags) osal: 26/08/22 848-0030004 al Abidin Ibrahim (JJY679) 0 (Electrical Waste) | sampled in Sc | ement Plan and heduled Waste | Complied |

…making excellence a habit.[™]



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|--|---|------------|
| 4.5.3.4 | Domestic waste should be disposed as such to minimize the risk of | Driver: Zainal Abidin Ibrahim (JJY679) Type: SW409 (Contaminated Container) Qty: 191 Kg Date of Disposal: 26/08/22 CN No: 090848-0080001 Driver: Zainal Abidin Ibrahim (JJY679) Type: SW422 (Mixed Scheduled Waste) Qty: 56 Kg Also included other category SW306 (Spent Lubricating Oil), SW305 (Spent Hydraulic Oil), SW 102 (Used Batteries), SW110 (Electrical Waste) as stated in Collection Transportation Instruction (DCTI No. 0000097966) dated 25/08/22 to Kualiti Alam Logistic. Domestic waste engaged a contractor (Zana Niaga Enterprise) to | OFI |
| | contamination of the environment and watercourse. - Minor compliance - | collect and dispose off at municipal landfill. Collection every Wednesday as stated in Waste Management Plan as sampled. Disposed as Labis District Landfill and Buluh Kasap Landfill. | |
| Criterio | n 4.5.4: Reduction of pollution and emission | | |
| 4.5.4.1 | An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance - | The FGVPI Belitong POM has implemented its GHG Calculator to calculate the following emissions parameter/source. Data calculated by using RSPO Calculator as verified. Identification and significant determination of environmental aspect has identified boiler and incinerator chimney as one of the sources of pollution. Monitoring was through stack monitoring of dust particulate and dark smoke observation. | Complied |



| Criterio | on / Indicator | Assessment Findings | | | | Compliance |
|----------|---|--|--|----------------------------|-------------------------------|------------|
| 4.5.4.2 | An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance - | emission and polluting ac Reduce usage of dies Monitoring emission air pollution device ar Emission of Noise Boukeeping Monitoring and maint | Monitoring emission of Dark Smoke Mill Stack - Installation of air pollution device and Inspection of Vehicle Conditions Emission of Noise Boundary - parameter noise mapping data keeping Monitoring and maintenance of Effluent discharge Proper disposal of Scheduled waste and recycling of domestic | | | 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 - | POME discharge limits at final discharge point sam as below which was sa Accredited Lab (ChM Iried Parameter PH at 25°C COD (mg/L) BOD (mg/L) Sus. Solid (mg/L) | pled for mont ampled and | th of October analysed by | and July 2022 Chemist from | Complied |
| | | Amm-N (mgL) Tot N (mg/L) Oil& Grease (mg/L) Total Solid (mg/L) | ND (<5) 16 8 1164 | ND (<5) 10 5 5140 | 20 100 5 | |

Criterion 4.5.5: Natural Water resources



| Criterio | on / Indicator | Assessment Findings | Compliance |
|------------|---|--|------------|
| 4.5.5.1 | The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). - Major compliance - | Found established a Water Management Plan 2022 which identifies the Source of water, activity, water use, possible threat, impact to stakeholder, root cause, action plan and responsibility. a) Monitoring of water has been evaluated based on the management plan as follows: Mill Operation: Processing of FFB Mill maintenance and daily usage Canteen Residential Usage of domestic water from Syarikat Air Johor b) Ways of optimization of water was documented in the plan as Sample taken on Processing of FFB activity: Source of water – Sayong River Estimate water usage – based on processing monthly FFB tonnage | Complied |
| 4.5.5.2 | Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations. - Major compliance - | The POME is discharge through watercourse. The BOD is below approved limit of 20mg/l by DOE and adhere to the Schedule of Compliance. | Complied |
| 4.6 Prince | ciple 6: Best Practices | | |
| Criterio | 1 4.6.1: Mill Management | | |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|---|---|------------|
| 4.6.1.1 | Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance - | In FGVPI Belitong POM sighted Operational Manual documented, approved by GM PSQM of Felda Palm Industries Sdn. Bhd. Also available Operational Manual List with 141 titles of operational manuals. Among sampled included: • Elevator Nut Operation (FPI/L3/08-05) Rev.01 dated 26/02/16 • Security Control (FPI/L3/1-02) Rev.02 • Handling EFB Hopper (FPI/L3/6-02) Rev.1 • Oil Tank Operation (FPI/L3/10-2) Rev.0 • Booster Pump Operation (FPI/L3/12-07) Rev.0 • Boiler Operation (FPI/L3/12-17) Rev.0 FGV Holdings Berhad has established mechanism to monitor the implementation of their procedure by Mill Quality Control Unit and Audit on compliance to SOP (P&D). The visit conducted on annually basis. | Complied |
| 4.6.1.2 | All palm oil mills shall implement best practices. - Major compliance - | Environmentally FGVPI Belitong POM is operating in accordance to Scheduled of Compliance [Jadual Pematuhan] – as License of Crude Palm Oil operation under Jabatan Alam Sekitar Negeri Johor and all the Standard Operating Procedures. The mill is implementing 5'S system where visual display and good housekeeping arrangement sighted particularly for filling and office layout. | Complied |
| Criterio | n 4.6.2: Economic and financial viability plan | | |
| 4.6.2.1 | A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance - | Available a long term forecast of FFB for FGV estates for period (2021-2030). Processing cost of FFB (RM/MT) for period (2021-2030). FGVPI Belitong POM has established a details Budget for FY 2022 such as: | Complied |



| Criterio | on / Indicator | Ass | sessment Findin | gs | Compliance |
|----------|---|---|------------------------|------------------|------------|
| | | Capacity: 54 MT/H | | | |
| | | • Number of workers: | 81 | | |
| | | Operational cost | | | |
| | | Processing FFB and p | oroduction | | |
| | | Other Products | | | |
| | | Expenses and variab | le supply and servic | es | |
| Criterio | n 4.6.3: Transparent and fair price dealing | | | | |
| 4.6.3.1 | Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance - | Sighted pricing mechan CMzone Sollution date Segamat and Maokil Lab | Complied | | |
| | | Туре | Buluh Kasap (RM/MT) | Labis (RM/MT) | |
| | | Industrial waste | 30.00 | 18.00 | |
| | | Commercial waste | 30.00 | 18.00 | |
| | | Institution waste | 30.00 | 18.00 | |
| | | Construction waste | 10.00 | 10.00 | |
| 4.6.3.2 | All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. | Found contract (Palm Ar of fair, legal, transparen | | | Complied |
| | - Major compliance - | Invoice No. PAES 1473 | | | |
| | | DO No. PAES 1365 | | | |
| | | PO No. 3301556367 date | ed 23/06/22 | | |
| | | Term 31 days | | | |
| | | Job Completion Certifica | te for Contract No. | SPK 3301556367 | |
| | | Job completed on 23/06 | | | |



| Criterio | n / Indicator | Assessment Findings | Compliance |
|----------|--|---|------------|
| Criterio | 1 4.6.4: Contractor | | |
| 4.6.4.1 | In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance - | Supplier Code of Conduct FGV Holdings Berhad (Document Version 001.05.2020) sampled contains item No. 5 Sustainability (5.1 FGV's Group Sustainability Policy and 5.2 Adherence to Sustainability Certification such as RSPO and MSPO. Acknowledgement by Mohamad Nor as representative from Palm Armada Engineering and Supply made with signature on the document. | Complied |
| 4.6.4.2 | The management shall provide evidence of agreed contracts with the contractor. - Major compliance - | FGVPI Belitong POM engaged Palm Armada Engineering & Supply as contractor for maintenance, repairing water pump, tyre replacing as record of job and payment made 7 type of jobs in 2022. Supplier Code 100001892. Sighted Invitation Offer (Form T1-C) for Job value less than RM 10K. Reference No. BLT-184/2022 dated 18/06/22 for Providing manpower, material and equipment and related needs to repair broken water pump at FGVIP Belitong POM. Approved by Sr. Estate Manager. Term and condition and Specification of job clearly stated in Attachment 1. In relation to this a Work Instruction Letter dated 18/06/2022 issued and endorsed by Palm Armada Engineering and Supply. Job to be done starting from 18/06/2022 to 30/06/2022 | Complied |
| 4.6.4.3 | The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance - | The management of FGVIP Belitong POM, has accepted MSPO approved auditors (internal and external) to verify the assessments through a physical inspection. Contractor engaged to collect domestic waste (Zana Niaga Enterprise) has provide agreement to accept MSPO approved auditor to verify assessment through physical inspection as letter signed by Suzaanna Sharif (Representative) on 02/11/2022. | Complied |



Appendix B: Smallholder Member Details

| | Smallho | older | Location of | GPS Cod | ordinates | Certified | Planted |
|-----|---------|------------------------|----------------------------|----------|-----------|-----------|-----------|
| No. | Name | MPOB License Number | Planted Area (District) | Latitude | Longitude | | Area (ha) |
| | NA | | | | | | |
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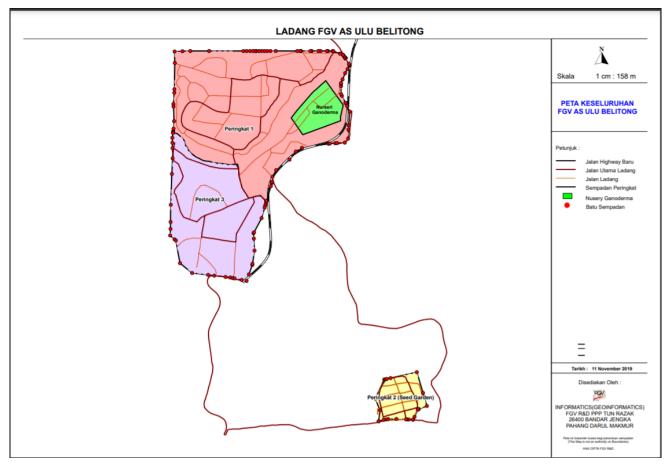
Appendix C: Location and Field Map

Belitong Palm Oil Mill



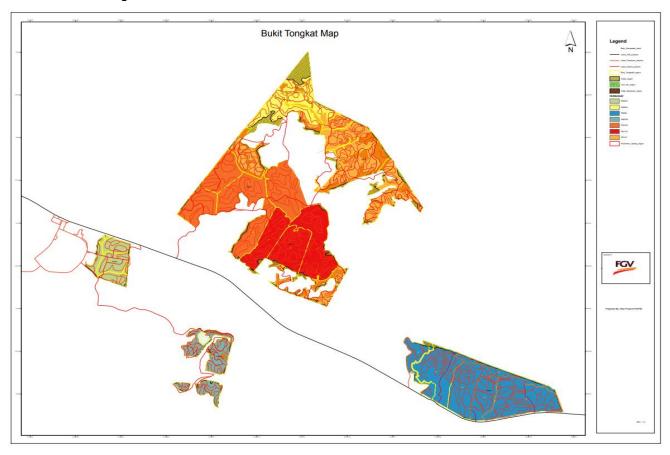


FGVAS Ulu Belitong Estate





FGVPM Bukit Tongkat B Estate





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

GHG Greenhouse Gas

GMP Good Manufacturing Practice
GPS Global Positioning System
HCV High Conservation Value
IPM Integrated Pest Management

ISCC International Sustainable Carbon Certification

LD50 Lethal Dose for 50 sample
MSPO Malaysian Sustainable Palm Oil
MSDS Material Safety Data Sheet

MT Metric Tonnes
OER Oil Extraction Rate

OSH Occupational Safety and Health

PK Palm Kernel
PKO Palm Kernel Oil
POM Palm Oil Mill

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment

RTE Rare, Threatened or Endangered species
SEIA Social & Environmental Impact Assessment

SIA Social Impact Assessment SOP Standard Operating Procedure