

**RSPO PRINCIPLE AND CRITERIA –
3rd Annual Surveillance Assessment (ASA3)
Public Summary Report**

Genting Plantations Berhad
Client company Address: 10 th Floor, Wisma Genting Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
Certification Unit: Genting Sabapalm Oil Mill KM 25, Down Sg. Labuk Mukim Tagas-Tagas 90000 Beluran, Sandakan Sabah, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0086-06-000-00	Membership Approval Date	14/11/2006
Parent Company Name	Genting Plantations Berhad		
Address	10 th Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia		
Subsidiary (Certification Unit Name)	Genting Sabapalm Oil Mill		
Address	KM 25, Down Sg. Labuk, Mukim Tagas-Tagas 90000 Beluran, Sandakan, Sabah, Malaysia		
Contact Name	Mr Arunan Kandasamy (Senior Vice President – Plantation Division)		
Website	http://www.gentingplantations.com	E-mail	Arunan.kandasamy@genting.com
Telephone	+603 2333 6510 (Head office) +607 7631 992	Facsimile	+603 2333 6575

2. Certification Information			
Certificate Number	RSPO 653477	Date of First Certification	09/06/2016
		Certificate Start Date	09/06/2016
		Certificate Expiry Date	08/06/2021
Scope of Certification	Palm Oil and Palm Kernel Production		
Applicable Standards	RSPO P&C MY-NI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E Mass Balance)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE119-60193799	ISCC EU	ASG Cert GmbH	12/01/2020
MSPO 689067	MS 2530-4 Malaysia Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	03/07/2019
MSPO 689068	MS 2530-3 Malaysia Sustainable Palm Oil (MSPO) Part 3		
MPOB/Cop/MF/0024-2	Code of Good Milling Practice for Palm Oil Mills	MPOB	20/12/2021
AR 5768-ISO 9001:2008	QMS	SIRIM QAS International Sdn Bhd	24/02/2020
ER 0741 – ISO 14001:2004	EMS		24/02/2020

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SR 0590 – OHSAS 18001:2007	OHSAS		24/02/2020
SR 0591 – MS 1722:2011	OSHMS		24/02/2020

4. Location(s) of Mill & Supply Bases

Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Genting Sabapalm Oil Mill	Beluran, Sabah, Malaysia	5° 57' 54.3" N	117° 22' 26.8" E
Genting Sabapalm Estate	Beluran, Sabah, Malaysia	5° 57' 54.3" N	117° 22' 26.8" E

5. Description of Supply Base

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Sabapalm Estate	3,936.95	17.39	404.26	4,358.60	90.33%

6. Plantings & Cycle

Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Sabapalm Estate (GSPE)	409.18	771.79	1,867.61	688.60	199.76	3,527.76	409.18

7. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year		
	Estimated (June 2018-May 2019)	Actual (April 2018-Feb 2019)	Forecast (June 2019-May 2020)
Genting Sabapalm Estate (GSPE)	93,500.00	83,609.38	96,308.00

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *

Estate	Tonnage / year		
	Estimated (June 2018-May 2019)	Actual (April 2018-Feb 2019)	Forecast (June 2019-May 2020)

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	N/A
Total	N/A

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (June 2018-May 2019)	Actual (April 2018-Feb 2019)	Forecast (June 2019-May 2020)
Smallholders	23,200.00	20,683.03	20,700.00

10. Certified Tonnage			
	Estimated (June 2018-May 2019)	Actual (April 2018-Feb 2019)	Forecast (June 2019-May 2020)
	FFB	FFB	FFB
Mill Capacity: 20 MT/hr	93,500.00	83,609.38	96,308.00
SCC Model: MB	CPO (OER: 21.45%)	CPO (OER: 20.98%)	CPO (OER: 21.50%)
	20,055.00	17,543.94	20,706.00
	PK (KER: 4.10%)	PK (KER: 4.09%)	PK (KER: 4.30%)
	3,833.50	3,418.70	4,141.00

11. Actual Sold Volume (CPO) (April 2018-Feb 2019)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	0	16,200.96	0	1,249.12	17,450.08

12. Actual Sold Volume (PK) (April 2018-Feb 2019)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	1,832.14	0	0	1,441.34	3,273.48

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	N/A	N/A
IS-CSPKO	N/A	N/A
IS-CSPKE	N/A	N/A

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
59200 Kuala Lumpur
Tel +603 2242 4211 Fax +603 2242 4218
Nicholas Cheong: Nicholas.Cheong@bsigroup.com
www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site annual surveillance assessment was conducted from 11-13/03/2018. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, 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. RSPO Principles & Criterias 2013 (MY-NI 2014) and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

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

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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 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

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

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

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

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

Assessment Program							
Name (Mill / Supply Base)			Year 1 (Initial Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Genting	Sabapalm	Oil Mill	√	√	√	√	√
Genting Sabapalm Estate			√	√	√	√	√

Tentative Date of Next Visit: March 17, 2020 – March 19, 2020

Total No. of Mandays: 7.0 mandays including 1.0 day SC for mill.

2. 2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Hu Ning Shing	Team Leader	She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages
Muhammad Masran Fadzli	Team Member	He graduated in Bachelor of Forestry Science at University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. He had accumulated auditing experience when he was the internal auditor for ISO9001 and ISO14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. During this assessment, he assessed on the aspects of environmental and estate best practise. He is fluent in Bahasa Malaysia and English languages.
Amir Bahari	Team Member	He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health. He is fluent in both verbal/written in Bahasa Malaysia and English

Accompanying Persons:

No.	Name	Role
N/A		

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2.2 Assessment Plan

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

PRELIMINARY AGENDA					
Date	Time	Subjects	HNS	AB	MF
Sunday 10/03/2019	PM	Audit team travelling to Sandakan (AK 5196 – Arrive 2035)	√	√	√
Monday 11/03/2019 Genting Sabapalm Oil Mill	0830 - 0900	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). Verification on previous audit findings 	√	√	√
	0900 – 1200	Genting Sabapalm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge	√	√	√
	1100 -1200	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1200 – 1300	Lunch	√	√	√
	1300 - 1630	Genting Sabapalm Oil Mill Document Review P1 – P8: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
	Tuesday 12/03/2019 Genting Sabapalm Estate	0830 - 1200	Genting Sabapalm Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√
1000 – 1100		Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
1200 -1300		Lunch	√	√	√

	1300 - 1630	Genting Sabapalm Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Wednesday 13/03/2019 Genting Sabapalm Oil Mill	0830 - 1600	Supply chain audit for Genting Sabapalm Oil Mill <ul style="list-style-type: none"> • General COC for supply chain • RSPO rules communication and claim • Module E: Mass Balance 	√	-	-
	1200 -1300	Lunch	√	-	-
	1600 - 1630	Verify any outstanding issues & Preparation for closing Meeting	√	-	-
	1630 - 1730	Closing Meeting	√	√	√
	1730	Traveling to Sandakan	√	-	-

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Genting Plantations Berhad/ Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Summary of the Time Bound Plan		
Does the plan include all subsidiaries, estates and mills?	All subsidiaries, estates, mills and refinery (existing operations and yet to be constructed) except those estates (landholdings) planned to be developed into property development (West Malaysia)	Yes

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Have all the estates and mills certified within five years after obtaining RSPO membership?	The first oil mill and its supply bases were certified in 2015.	Yes
Is the time bound plan challenging? <ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. 	The TBP is challenging due to progressive development, location of the estates and mills. ISPO and MSPO are mandatory requirements in Indonesia and Malaysia, thus the Sustainability team is also focusing on the implementation and compliance. This TBP is made more challenging due to the announcement by RSPO below.	Yes
Have there been any changes since the last audit? Are they justified?	<p>On 12 October 2017, the RSPO Secretariat released a statement on Hak Guna Usaha (HGU) to Indonesian stakeholders (https://rspo.org/news-and-events/announcements/revised-rspo-updated-statement-on-hak-guna-usaha-july-2018), The statement set out the requirements on legality of land, whereby an RSPO grower member's rights to land must be in the form of a legitimate HGU and Izin Usaha Perkebunan (IUP), prior to obtaining RSPO certification.</p> <p>Pursuant to this, which was effective as of 12 October 2017, RSPO members must have a legitimate right to cultivate (Hak Guna Usaha or a HGU) and IUP in order to secure the RSPO certificates.</p> <p>As of Feb 2019, only 2 PTs in Indonesia have obtained the HGU. The rest are in process of applying for the HGU. Due to the unpredictable timeline for the HGU process, the company will revise this TBP according to the issuance of the HGU.</p>	Yes
If there have been changes, what circumstances have occurred?	No any circumstances occur that lead to any changes.	N/A
Have there been any stakeholder comments?	To-date, no comments received from stakeholders on the TBP.	Yes
Have there been any newly acquired subsidiaries?	No new acquisition as of 1 Feb 2019	Yes
If yes, have the newly acquisitions certified within a three-year timeframe?	N/A	N/A
Have there been any isolated lapses in implementation of the plan?	No lapses however re-scheduling of the certification dates has been made.	Yes
Un-Certified Units or Holdings		

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<p>No replacement after dates defined in NIs Criterion7.3:</p> <ul style="list-style-type: none"> • Primaryforest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	<p><u>Sabah</u> 1.Genting Kencana Estate – LUCA passed, Concept Note for Remediation and Compensation submitted to Panel. Concept Note under revision and to be re-submitted to the Panel in 1Q 2019. 2.Genting Jambongan Estate – Concept Note and Remediation Plan has been submitted to RSPO. RSPO allowed for Genting Jambongan to proceed with its certification programme.</p> <p><u>Indonesia</u> 1. PT SISM – LUCA passed. Concept Note and Remediation Plan submitted and approved by Panel. Action plan to be checked by auditor during the next audit. 2. PT GAL – LUCA under review by RSPO.</p>	<p>Yes</p>
<p>Any new plantings since January 1st2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>NPP for PT PALJ, PT AAC, PT UAI, PT SMA, PT KIU are in progress.</p>	<p>Yes</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4,7.5 and7.6.</p>	<p>http://www.rspo.org/members/complaints/status-of-complaints/view/38 (Complaints officially closed on 31 October 2016)</p>	<p>Yes</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion6.3.</p>	<p>None</p>	<p>Yes</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>https://askrspo.force.com/Complaint/s/casetracker No any legal non-compliance occur.</p>	<p>Yes</p>
<p>Did the company conduct an internal audit? If so, has a positive assurance statement been produced?</p>	<p>Internal audit was conducted for uncertified units on periodical basis by Sustainability Team. Internal audit report indicated the positive assurance has been produced.</p>	<p>Yes</p>

3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?	Not applicable	N/A

3.4 Details of findings

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

During the Certification Assessment there were one (1) Major & six (6) Minor nonconformities raised. The Genting Sabapalm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1751086-201903-M1	Clause & Category (Major / Minor)	Indicator 6.5.2 Major
Date Issued	12/03/2019	Due Date	10/06/2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	10/06/2019
Statement of Nonconformity:	Agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) was not available for the contractors' workers.		
Requirement Reference:	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.		
Objective Evidence:	GSPE: The employment contract for all contractors' workers was not available in GSPE.		
Corrections:	Estate (GSPE) to issue the latest Employment Agreement to the workers. To ensure the agreement is signed by the workers after briefed on the contents.		
Root Cause Analysis:	The 'contractors' workers' belong to estate (GSPE), but managed by contractor. Therefore, GSPE didn't issue the Employment Agreement to the workers.		
Corrective Actions:	All workers with GENP work permit (recruited by GENP) shall be issued with Employment Agreement and pay slip by GSPE. All these workers shall be included into the estate's workers master list as well.		

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	<p>Training to the management team on 'Social Management Procedure' SMP-GPB-32 (clause 6.7.1 Pay and Conditions).</p> <p>Verification by Sustainability Dept during Sustainability Internal Audit annually.</p> <p>Major Closure Verification: Seen the Genting Sabapalm Estate Labour Master Listing 2019 where the contract's workers have been included into the master listing. Besides, the employment contracts between GSPE and the workers were sighted with the sampled as below:</p> <ul style="list-style-type: none"> i. Passport No.: AT 989750 ii. Passport No.: AU 043965 iii. Passport No.: AS 366013 iv. Passport No.: AT 986385 v. Passport No.: AT 266768 <p>In additional, training on the Procedures for Social Management, Doc. No.: SMP-GPB-32 dated 18/1/2018 was given to the contractors on 10/6/2019 to brief on how to manage the workers under GSPE. Sustainability Department has included the requirements of the contractors' workers into the GSPE – RSPO and MSPO Compliance Checklist in order for the Sustainability Department to carry out verification and monitoring during internal audit.</p>
Assessment Conclusion:	<p>The corrective action was effectively closed on 10/6/2019 by offsite due to the risk of system breakdown was very minimal. Continuous implemented will be further verified in the next assessment.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1751086-201903-N1	Clause & Category (Major / Minor)	Indicator 4.1.2 Minor
Date Issued	12/03/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	Mechanism to check consistent implementation of procedures was not effectively implemented.		
Requirement Reference:	A mechanism to check consistent implementation of procedures shall be in place.		
Objective Evidence:	<p>GSOM & GSPE: According to the Procedure of Social Management, Doc. No. SMP-GPB-32, Rev. 00 dated 18/1/2018, Section 6.8.2, Workers' Committee meeting shall be conducted at least quarterly or whenever necessary. However, the last meetings were conducted on 25/1/2019 and 24/3/2018 in GSOM and 12/2/2019 and 26/1/2018 in GSPE.</p> <p>GSOM: According to the Procedure of Social Management, Doc. No. SMP-GPB-32, Rev. 00 dated 18/1/2018, Section 6.6.5, Gender Committee meeting shall be conducted at least 6 months once or whenever necessary. However, meeting was conducted on</p>		

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	<p>yearly basis and the last meeting for Year 2018 was held on 10/1/2018 and 14/2/2019 for Year 2019 in GSOM.</p> <p>GSPE: 1 (Employee No.: E11010) out of 22 workers sampled who is a FFB Checker found that she did not carry out her work as per the Procedure "Tugas Checker", Rev. 1 dated 2018 where she was supposed to ensure the FFBs were checked properly according to the quality of FFB and those off-grade FFB shall not be sent to the oil mill. However, there were some unripe FFBs were sent to oil mill on November 2018 and February 2019 by verified through the payslip where deduction has been made according to the procedure.</p>
Corrections:	<p>A) To conduct the meeting as per procedure of Social Management, Doc. No. SMP-GPB-32 and to included the requirements as per procedure into the Mill Schedule Master list.</p> <p>B) To conduct training to all estate checker as per SOP requirements.</p>
Root Cause Analysis:	<p>A) Failure to comply with the procedure requirements due to there is no monitoring on the meeting schedule.</p> <p>B) The estate FFB checker failure to comply/execute the task as per SOP due to the awareness and competency level was not adequate and there is no continuous training conducted to them.</p>
Corrective Actions:	<p>A) To conduct Workers & gender Committee meeting together with Osh Meeting and.</p> <p>B) The checker training and awareness to be included into the estate annual training plan.</p>
Assessment Conclusion:	<p>Corrective action plan is accepted. Since this is a minor NC, the effectiveness of implementation shall be verified in the next assessment.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1751086-201903-N2	Clause & Category (Major / Minor)	Indicator 6.10.4 Minor
Date Issued	12/03/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	Agreed payments for the smallholders were not made in the agreed timeline as per in the Policy of Purchase of FFB.		
Requirement Reference:	Agreed payments shall be made in a timely manner.		
Objective Evidence:	<p>GSOM: Sampled of the payment advices for FFB suppliers as below: a. Transaction Reference# 514939110100149 dated 13/12/2018 for FFB supplier. b. Transaction Reference# 515216800100204 dated 14/1/2019 for FFB supplier c. Transaction Reference# 515492970100014 dated 13/2/2019 for FFB supplier d. Transaction Reference# 514939110100307 dated 13/12/2018 for FFB supplier Verified from the Marketing Department confirmed that they have delayed in</p>		

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	sending the invoice to the Finance Department for payment. Therefore, the payment was made after the agreed timeline which is before 12th of the following month.
Corrections:	Marketing Department to communicate the agreement with finance department on the payment condition to FFB supplier.
Root Cause Analysis:	The agreement details regarding the payment date for smallholders was not communicate by marketing with finance department.
Corrective Actions:	Marketing department to provide the invoice details to the Finance department within the timeline agreed to ensure finance department could process the payment to the FFB supplier.
Assessment Conclusion:	Corrective action plan is accepted. Since this is a minor NC, the effectiveness of implementation shall be verified in the next assessment.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1751086-201903-N3	Clause & Category (Major / Minor)	Indicator 2.1.3 Minor
Date Issued	12/03/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	Mechanism for ensuring compliance was not implemented effectively.		
Requirement Reference:	A mechanism for ensuring compliance shall be implemented.		
Objective Evidence:	GSOM: The mill operates under MPOB license no 5000-280-0000 issued for period of 01/11/17-31/10/18. The license provides therein; a) Entitlement of menjual and mengalih FFB b) The total processed allowed is 96000 mt The mechanism for the monitoring the approved quantity is ineffective as the total FFB processed during (1/11/17 – 31/10/18) is 115793.57mt exceeding 19793.57mt equivalent to 20.61% of the approved quantity.		
Corrections:	Monitor year to-date FFB process by monthly basis.		
Root Cause Analysis:	There is no monitoring on the actual FFB process against the MPOB license.		
Corrective Actions:	Divert the FFB to other Genting oil mill for processing if projected to be over capacity by the year end or as per MPOB license validity period.		
Assessment Conclusion:	Corrective action plan is accepted. Since this is a minor NC, the effectiveness of implementation shall be verified in the next assessment.		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1751086-201903-N4	Clause & Category (Major / Minor)	Indicator 4.8.2 Minor

Date Issued	12/03/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	No training made in relation to peat soil management.		
Requirement Reference:	Records of training for each employee shall be maintained.		
Objective Evidence:	GSPE: During the field visit at Block 67 P2010 peat area, the accompanying team was unable to explain the procedure of the following; a) Water level reading b) Subsidence level recording		
Corrections:	A) To get new SOP/Guideline on Peat Soil Management B) To conduct simplified awareness training on Whistle Blowing Policy		
Root Cause Analysis:	A) No SOP/ Guideline and training on peat soil management. B) Level of understandings among the workers are low even with training provided.		
Corrective Actions:	A) SOP/Guideline training on Peat Area Management will be held at Genting Suan Lamba Estate on 10th April 2019. B) Policy training including Whistle Blowing to be explained during the Induction course for new workers and simplified Whistle Blowing Policy flow chart to be displayed at prominent sites.		
Assessment Conclusion:	Corrective action plan is accepted. Since this is a minor NC, the effectiveness of implementation shall be verified in the next assessment.		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1751086-201903-N5	Clause & Category (Major / Minor)	Indicator 4.4.1 Minor
Date Issued	12/03/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	Water Management Plan were not effectively implemented.		
Requirement Reference:	An implemented water management plan shall be in place.		
Objective Evidence:	GSOM: Drinking water analysis should be conducted on quarterly basis as per Sustainability Management Procedure Manual. Refer document no. SMP-GPB- 15. Noted during the document review, the mill conducted the drinking water analysis only once for FY2018. Refer certificate of analysis no. 20180222-09- 0.		
Corrections:	Prepare the Quarterly basis schedule to send out the sample of drinking water for analysis.		
Root Cause Analysis:	Drinking water analysis sample, no send out for testing by 3rd party.		

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Corrective Actions:	Monthly review on the schedule master list to avoid any miss out sample send for analysis.
Assessment Conclusion:	Corrective action plan is accepted. Since this is a minor NC, the effectiveness of implementation shall be verified in the next assessment.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1751086-201903-N6	Clause & Category (Major / Minor)	Indicator 5.3.3 Minor
Date Issued	12/03/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	Waste management plan was not effectively implemented.		
Requirement Reference:	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.		
Objective Evidence:	<p>GSOM: Used PPE were identified as Scheduled Waste in the Identification, Segregation and Storage of Waste. Noted during interview with the storekeeper, as per mill practice, workers who requested to replace used PPE have to return the old PPE to be stored in the Scheduled Waste Store before disposed by licensed contractors. However, no evidence of used PPE inventory and disposal. This indicates the waste management plan is not effectively implemented.</p> <p>GSPE: As per waste management plan, domestic waste schedule to be collected on weekly basis. Noted during document review in Landfill monitoring record book, the domestic waste for the month of December 2018, January and February 2019 were not collected as per scheduled.</p> <p>Used PPE were identified as Scheduled Waste in the Identification, Segregation and Storage of Waste. Noted during interview with the storekeeper, as per estate practice, workers who requested to replace used PPE have to return the old PPE to be stored in the Scheduled Waste Store before disposed by licensed contractors. However, no evidence of used PPE disposal.</p>		
Corrections:	<p>GSPE: A) To appoint dedicated drivers for rubbish collection based on rubbish collection schedule and weekly monitoring by person in charge. B) To conduct proper training for the person in charge and Assistant Manager on monitoring and documentation record of disposal SW 410 (used PPE). To dispose SW 410(used PPE) through Lagenda Bumi Mas Sdn.Bhd</p> <p>GSOM: Retrain store attendant and all workers on the Scheduled Waste Management System.</p>		
Root Cause Analysis:	<p>GSPE: A) There was no dedicated driver to collect rubbish as per collection schedule and no monitoring from the person in charge.</p>		

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	<p>B) Ineffective training and monitoring for the person in charge on disposal and recording of SW 410 (used PPE).</p> <p>GSOM: No used PPE disposal in Schedule waste store.</p>
Corrective Actions:	<p>GSPE: A)1) Inspection will be done by the person in charge on weekly basis. Respective Estate Housing Ketua Kampung to inform person in charge regarding any delay on Rubbish collection. B) 1) To conduct training for Storekeeper & Assistant Manager annually 2) To include Scheduled Waste Training in Estate Training Matrix 3) To dispose SW410(used PPE) together with other Scheduled waste materials.</p> <p>GSOM: To conduct training and check on the month disposal schedule waste inventory record for any schedule waste not recorded.</p>
Assessment Conclusion:	Corrective action plan is accepted. Since this is a minor NC, the effectiveness of implementation shall be verified in the next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	NIL

Positive Findings	
PF #	Description
PF 1	Good commitment of the management team on implementation of RSPO certification.

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity			
NCR Ref #	1621036-201803-M1	Clause & Category (Major / Minor)	RSPO SCCS 5.3.1 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	15/06/2018
Statement of Nonconformity:	The written procedure (Traceability and Mass Balance (Mill), SMP-GPB-23, Revision:04, Dated 21/11/2014) was not adequate.		
Requirement Reference:	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 		
Objective Evidence:	The latest requirements under RSPO SCC System and Standard revised June 2017 have not been incorporated in the SOP such as the requirement of internal audit.		
Corrective Actions:	To ensure existing procedure are reviewed accordingly whenever new requirement are introduce.		

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Assessment Conclusion:	ASA3 verification: Internal Audit, Doc. No. SMP-GPB-03, Rev. 04 dated 25/5/2018 was developed and implemented in the Oil Mill. The frequency of the internal audit is not less than once a year as per the procedure. The requirements of RSPO have been addressed in the procedure. The procedure has remained valid and up-to-date as there was no new requirements for supply chain has been introduced. Thus, the Major Non-conformance remained closed.
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Non-Conformity			
NCR Ref #	1621036-201803-M2	Clause & Category (Major / Minor)	RSPO SCCS 5.3.2 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	15/06/2018
Statement of Nonconformity:	The written procedure (Traceability and Mass Balance (Mill), SMP-GPB-23, Revision:04, Dated 21/11/2014) was not adequate.		
Requirement Reference:	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. ii) effectively implements and maintains the standard requirements within its organization		
Objective Evidence:	1. The latest requirements under RSPO SCC System and Standard revised June 2017 have not been incorporated in the SOP such as the requirements of internal audit. 2. The internal audit has yet to be conducted.		
Corrective Actions:	To ensure existing procedures are reviewed and complied accordingly whenever new requirements are introduced. To ensure the latest procedure is filed and communicated to the management and sustainability team to ensure all the requirements are complied during the internal.		
Assessment Conclusion:	ASA3 verification: The last internal audit was carried out on 12-13/2/2019 by Sustainability Manager and Safety Officer. There was 1 non-conformance was raised during the audit through verified the internal audit checklist report. The procedure has remained valid and up-to-date as there was no new requirements for supply chain has been introduced and internal audit that involved for SCCS was carried out accordingly. Thus, the Major Nonconformance remained closed.		

Non-Conformity			
NCR Ref #	1621036-201803-M3	Clause & Category (Major / Minor)	RSPO SCCS 5.13.1 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	15/06/2018
Statement of Nonconformity:	Management review for RSPO supply chain has yet to be conducted.		
Requirement Reference:	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.		

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Objective Evidence:	There was no evidence that management review pertaining to RSPO Supply Chain issues has been conducted.
Corrective Actions:	To ensure existing procedures are reviewed and complied accordingly whenever new requirements are introduced. To ensure the latest procedure is filed and communicated to the management and sustainability team to ensure all the requirements are complied during the management review meeting.
Assessment Conclusion:	The company has established Management Review procedure, Doc. No. SMP-GPB-06, Rev. 01 dated 25/5/2018 and objective is to ensure the Sustainability Management System and performance continue to meet the RSPO, ISCC, MSPO or other sustainability requirements and needs of the Company. The frequency of the management review was set at least once a year. The procedure has remained valid and up-to-date as there was no new requirements for supply chain has been introduced. Thus, the Major Nonconformance remained closed. The last management review meeting was conducted on 7/3/2019.

Non-Conformity			
NCR Ref #	1621036-201803-M4	Clause & Category (Major / Minor)	RSPO SCCS 5.13.2 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	15/06/2018
Statement of Nonconformity:	Management review for RSPO supply chain has yet to be conducted.		
Requirement Reference:	The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 		
Objective Evidence:	There was no evidence that management review pertaining to RSPO Supply Chain issues has been conducted.		
Corrective Actions:	To ensure the latest procedure is filed and communicated to the management and sustainability team to ensure all the requirements are complied during future management review meetings as well as minute of meeting.		
Assessment Conclusion:	ASA3 verification: The last management review meeting was conducted on 7/3/2019 and meeting minutes was sighted. All the inputs were covered during the meeting as verified through the meeting minutes. Agenda that has discussed such as: a. Results of Internal RSPO SCCS Audit – Conducted on 12-13/2/2019 and there was 1 non-conformance raised. b. Customer feedback – As per 2018 there is no complaints from the mill customer – GMMR and Sandakan Edible Oil (SEO). The procedure has remained valid and up-to-date as there was no new requirements for supply chain has been introduced. Thus, the Major Nonconformance remained closed.		

Non-Conformity			
NCR Ref #	1621036-201803-M5	Clause & Category (Major / Minor)	RSPO SCCS 5.13.3 Major

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Closed (Yes / No)	Yes	Date of nonconformity Closure	15/06/2018
Statement of Nonconformity:	Management review for RSPO supply chain has yet to be conducted.		
Requirement Reference:	The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 		
Objective Evidence:	There was no evidence that management review pertaining to RSPO Supply Chain issues has been conducted.		
Corrective Actions:	To ensure the latest procedure is filed and communicated to the management and sustainability team to ensure all the requirements are complied during future management review meetings as well as minute of meeting.		
Assessment Conclusion:	ASA3 verification: The output from management review including decisions and actions were clearly recorded in the minute of meeting dated 7/3/2019 pertaining to the improvement and resource needs. The procedure has remained valid and up-to-date as there was no new requirements for supply chain has been introduced. Thus, the Major Nonconformance remained closed.		

Non-Conformity			
NCR Ref #	1621036-201803-M6	Clause & Category (Major / Minor)	Indicator 5.6.1 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	15/06/2018
Statement of Nonconformity:	The assessment of all polluting activities was not adequate.		
Requirement Reference:	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent .		
Objective Evidence:	At Genting Sabapalm Estate, no assessment related to greenhouse gas emissions was conducted.		
Corrective Actions:	To review Environmental Aspect And Impact Procedure (SMP-GPB-29) to include GHG as an Impact		
Assessment Conclusion:	ASA3 verification: The review on the Sustainable Management Procedure Manual on 6/6/2018 for amendment to include GHG and Relevant Interested Parties (External) as an impact. Refer document no. SMP-GPB-29 rev. 01 dated 11/6/2018 The estate has reviewed the Environmental Aspect Impact Assessment on 23/2/2019. . Refer document no. SP-MGR-02-F01-00. Sighted during document review the estate has included the Global Warming/ GHG as an impact		

Non-Conformity			
NCR Ref #	1621036-201803-N1	Clause & Category (Major / Minor)	Indicator 2.2.3 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	12/03/2019

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<p>Statement of Nonconformity:</p>	<p>There is lack of evidence that the decision (to temporary maintain the current situation and stakeholder need to write letter to Genting to own the land) have been accepted with free, prior and informed consent (FPIC).</p>
<p>Requirement Reference:</p>	<p>Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC)</p>
<p>Objective Evidence:</p>	<p>Based on consultation with stakeholder there's a feedback from the Village Head of Kampung Tembidong-bidong asking the status on conflicted area at the underplanted area within Genting Sabapalm Estate Sapi Division at block 17 and block 8. The area located at the boundary of Kampung Tembidongbidong smallholders whom overplanted within estate's underplanted area.</p> <p>Further trail of stakeholder's feedback revealed that Genting Sabapalm Estate management has conducted meeting with affected stakeholder as per record available i.e. Mesyuarat dengan orang berkepentingan (Kampung Tembidong-bidong) Terlebih tanam di Kawasan Ladang Genting Sabapalm; Date: 11/7/2015; Attendance: Sim Gik Tzi (Estate Manager); Jalaluddin Harun; Balatos Kalamang; Jaafar Saratin; Nasry Kalamang; Sapuddin Ungkil; Kevin Yam Tuck Cheong (AM); Alian John Moncal; Pawajang Pamalu.</p> <p>Based on the minutes of meeting records, the decision by then Estate Manager was to temporary maintain the current situation and stakeholder need to write letter to Genting to own the land.</p> <p>Sighted too the mapping of underplanted area within Sabapalm Estate Sapi Division block 8 and block 17 which currently overplanted by the following smallholders:</p> <ul style="list-style-type: none"> -Balatos bin Kolomong: 1.31 ha - Nasry bin Kolomong: 0.41 ha - Jaafar bin Jaji Saratin: 0.13 ha - Sapuddin bin Harun: 0.15 ha - Jalaluddin bin Harun: 0.67 ha - Balatos bin Kolomong: 0.47 ha - Nasry bin Kolomong: 0.41 ha - Jaafar bin Haji Saratin: 0.13 ha - Sapuddin bin Harun: 0.15 ha - Jalaluddin bin Harun: 0.67 ha - Balatos bin Kolomong: 0.84 ha <p>Totalling the area of 4.28 ha.</p> <p>There's also incomplete records of smallholders ownership sighted as following:</p> <ul style="list-style-type: none"> - Letter from officer of Jabatan Tanah dan Ukur Sabah, Malaysia; Surat pengesahan permohonan tanah (to Pegawai Penguasa Pertanian, Beluran); Ref. # 32/2/Vol.2/50 RJA/har; date: 14/7/1986; by Penolong Pemungut Hasil Tanah, Beluran. - Letter to Juru Ukur Daerah, Sandakan; Pemelihara Huran, Sandakan; Pegawai Pertanian Kanan, Sandakan; Ref. # 12/12/Vol.6/95; Date: 9/1/1985; for acknowledgement of PT85080061 seluas 3ha untuk pertanian

	<p>- MPOB license (expired) # 418121-101000; Nasri bin Kalamang; Menjual & Mengalih; validity: 8/5/2008-30/4/2013; Lot PT83081637 Nangoh, Labuk/Sugut, Daerah Sandakan, Sabah; Total area: 0.81ha; date: 4/5/2011</p> <p>Although the evidence from the minutes of meeting records mentioned that the decision by then Estate Manager was to temporary maintain the current situation and stakeholder need to write letter to Genting to own the land i.e. in other meaning was that Genting Sabapalm Estate allowed the smallholders to continue use Genting’s underplanted area however the feedback by village representative, minutes of meeting records and mapping records shown lack of evidence that the decision have been accepted with free, prior and informed consent (FPIC).</p>
<p>Corrective Actions:</p>	<p>All evidence of communication, report, photos and any agreement must be kept securely(in form of hard and soft copy) for future reference. To ensure resolution/negotiated agreements are available as part of evidence that any decision by both parties are accepted with FPIC(as per Negotiation & Compensation Procedure SMP-GPB-18</p>
<p>Assessment Conclusion:</p>	<p>ASA3 verification: There was a meeting conducted with the smallholders that overplanted in the land of GSPE on 25/2/2019. During the meeting, the Sustainability Manager has explained to the smallholders regarding the encroachment land and informed the smallholders that they will continue to maintain current situation with terms that they are not allowed to expand the area and construction of any new buildings. The smallholders have also asked some questions during the meeting and replied by the Sustainability Manager on the spot. Conclusion, the smallholders agreed and understood the outcome of discussion and have acknowledged on the minute received. Besides, a map of under-planted area has developed with indicated the acreage and smallholders that occupied the respective land. Furthermore, as to area statement of February 2019, the estate has identified the under-planted area for total 3.04 ha. Thus, the corrective action was effectively implemented and the minor non-conformity raised was closed on 12/3/2019.</p>

<p>Opportunity for Improvement</p>	
<p>OFI#</p>	<p>Description</p>
<p>OFI 1</p>	<p>1751086-201903-01</p> <p>Indicator 6.1.1</p> <p>Details: Social Impact Assessment has been conducted on 6-8/4/2017 in Genting Sabapalm Oil Mill and Genting Sabapalm Estate. It could be further enhanced by taking into consideration the negative and positive impacts of stateless dependent that staying inside the compound.</p>

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
Minor 1 – (previous CB)	Minor	6.5.3	20/08/2015	Closed out on 23/05/2017
1463422-201704-M1	Major	6.1.3	12/04/2017	Closed out on 23/05/2017
1463422-201704-M2	Major	6.5.2	12/04/2017	Closed out on 23/05/2017
1463422-201704-M3	Major	6.10.2	12/04/2017	Closed out on 23/05/2017
1463422-201704-N1	Minor	6.2.3	12/04/2017	Closed out on 18/04/2018
1463422-201704-N2	Minor	4.7.3	12/04/2017	Closed out on 18/04/2018
1463422-201704-N3	Minor	4.7.5	12/04/2017	Closed out on 18/04/2018
1621036-201803-M1	Major	SC 5.3.1	19/04/2018	Closed out on 15/06/2018
1621036-201803-M2	Major	SC 5.3.2	19/04/2018	Closed out on 15/06/2018
1621036-201803-M3	Major	SC 5.13.1	19/04/2018	Closed out on 15/06/2018
1621036-201803-M4	Major	SC 5.13.2	19/04/2018	Closed out on 15/06/2018
1621036-201803-M5	Major	SC 5.13.3	19/04/2018	Closed out on 15/06/2018
1621036-201803-M6	Major	5.6.1	19/04/2018	Closed out on 15/06/2018
1621036-201803-N1	Minor	2.2.3	19/04/2018	Closed out on 12/03/2019
1751086-201903-M1	Major	6.5.2	12/03/2019	Closed out on 10/06/2019
1751086-201903-N1	Minor	4.1.2	12/03/2019	“Open”
1751086-201903-N2	Minor	6.10.4	12/03/2019	“Open”
1751086-201903-N3	Minor	2.1.3	12/03/2019	“Open”
1751086-201903-N4	Minor	4.8.2	12/03/2019	“Open”
1751086-201903-N5	Minor	4.4.1	12/03/2019	“Open”
1751086-201903-N6	Minor	5.3.3	12/03/2019	“Open”

3.5. Stakeholders Consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Genting Sabapalm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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

List of Stakeholders Contacted	
Internal Stakeholders Workers' Representatives	Union/Contractors/Local Communities Kg. Tagas Sekolah Kebangsaan Tagas Tagas Sekolah Kebangsaan Sabapalm FFB suppliers Smallholders
Government Departments Immigration Officer Tagas Police Station	NGO NIL

IS #	Description
1	Feedbacks: Road maintenance from Sabapalm Estate boundary to Kg. Tagas Tagas was not in good condition. The stakeholders requested for the Sabapalm Estate/Palm Oil Mill to do some repair as the road was used by all including the FFB Supplier.
	Management Responses: The management has a programmed for road maintenance. The road maintenance will only be done until the Sekolah Kebangsaan Tagas Tagas as it was the centre of the community and the benefit were experience by all. Further than that is under the government authority.
	Audit Team Findings: The mill and estate management has conducted corporate social responsibility by maintaining the road until Sekolah Kebangsaan Tagas Tagas.
2	Feedbacks: Tagas Tagas Police Station and Sekolah Kebangsaan Tagas Tagas requested for clean water supply as they only rely to the rain water harvesting. The response time of the water supply is longer than expected.
	Management Responses: The management team will help to supply water to the Tagas Tagas Police Station and Sekolah Kebangsaan Tagas base on request The management will improve on the response time by assigned fixed tractor to transport the water to Tagas Tagas Police Station and Sekolah Kebangsaan Tagas
	Audit Team Findings: The estate mill management have addressed the issue.
3	Feedbacks: Sekolah Kebangsaan Sabapalm requested contribution to repair the school building. As the school building is under the Sabapalm Estate management, the school ask to be consult during the budget preparation.
	Management Responses: The Genting Plantation Management are in discussion with Pejabat Pendidikan Beluran regarding the status of the school. A meeting will be held in the nearest time. At the meantime, the estate management will continue to maintain the school building as per budget allocated.

	<p>Audit Team Findings: The estate management has addressed the issue.</p>
4	<p>Feedbacks: The immigration Department requested the mill/estate management to ensure the agent appointed to send the passport for PLKS renewal as per scheduled (1 month before expired).</p>
	<p>Management Responses: The management will bring the issue during meeting with the agent appointed.</p>
	<p>Audit Team Findings: The management has addressed the issue accordingly</p>
5	<p>Feedbacks: The FFB supplier requested for mill to prolong the FFB received time from 4.00 pm to 5.00 pm</p>
	<p>Management Responses: The mill management will extend the FFB receiving time upon request by FFB supplier.</p>
	<p>Audit Team Findings: The mill management has addressed the issue accordingly</p>
6	<p>Feedbacks: The smallholders requested the estate to supply them weedicide as the shop is far for the to get the supply</p>
	<p>Management Responses: The estate management will not supply the chemicals as it subject to be miss use by the smallholders</p>
	<p>Audit Team Findings: The estate management has addressed the issue accordingly.</p>

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Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Genting Sabapalm Oil Mill has complied with the RSPO P&C MY-NI 2014 & RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Genting Sabapalm Oil Mill is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Hu Ning Shing	Name: Arunan Kandasamy
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: Genting Plantations Berhad
Title: Lead Auditor	Title: SVP – Plantation (Malaysia)
Signature: 	<p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p>   24/6/19. 10 th Floor, Wisma Genting Jalan Sultan Ismail 50250 Kuala Lumpur
Date: 24/6/2019	Date: 24/6/2019

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Genting Sabapalm Oil Mill and Genting Sabapalm Estate has implemented Enquiry Register Book to record all the requests from the stakeholders. The company has issued a memo with a list of documents that could be requested by the stakeholders dated 23/7/2015. The documents and records that could be requested such as policies, SEIA reports, stakeholder meeting minutes, internal and external audit reports, management plans and procedures such as complaint and grievances, sexual harassment and negotiation and compensation. Each of the stakeholders will be issued with the memo. The stakeholders have been informed the role of them as stakeholders during the last stakeholder meeting conducted on 26/11/2018. Interviewed with the stakeholders such as contractor, local communities and internal workers confirmed that they are aware of it and understood that they have the rights to participate in the decision making.	Complied

Criterion / Indicator		Assessment Findings	Compliance
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	Genting Plantations Berhad has implemented Procedures on Requests and Responses, Doc. No. SMP-GPB-25, Rev. 00 dated 14/8/2014 to define the management responsibilities to respond constructively and promptly to the information requested by the stakeholders with sufficient objective evidence. Actions required by the management for receiving, recording and responding to enquiries and requests from both internal and external stakeholders also defined in the procedure. All the enquiry and request will be documented in the Enquiry Register Book. Timeframe to acknowledge and respond to the request is within 7 working days upon receiving the request from stakeholders. Seen the Enquiry Register Book in GSOM found that the request letter from stakeholders were attached together in the book with responses from the management and the acknowledgement from the requesters after actions have been taken.	Complied
Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			

Criterion / Indicator	Assessment Findings	Compliance
1.2.1 Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). - Major compliance –	The company has issued a memo with a list of documents that could be requested by the stakeholders dated 23/7/2015. Genting Plantations Berhad is open to all the stakeholders to request information such as policies, SEIA reports and management plans, audit reports, pollution reduction plans, complaint & grievances procedure, FPIC procedure and land title. The stakeholders will fill in the Enquiry Register Book in order to access to the documents. Sustainability Report and Annual Report will be publicly available in the company’s website: www.gentingplantations.com .	Complied
Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.		
1.3.1 There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance	Genting Plantations Berhad has developed Ethical Conduct and Integrity Policy dated 22/6/2015. The company is committed to conduct its business ethically and with integrity at all times. The following values need to be followed by all the employees: <ol style="list-style-type: none"> i. Respect for fair conduct of business ii. Refrain from all forms of corruption, bribery and fraudulent use of funds and resources iii. Respect and protect confidential and/ or privileged information to which we have access in the course of our duties The policy was briefed to the workers on 19/2/2019 in GSOM and 4/3/2019 in GSPE.	Complied
Principle 2: Compliance with applicable laws and regulations		

Criterion / Indicator	Assessment Findings	Compliance
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.		

<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>Genting Plantation Sdn Bhd has obtained permits for Jabatan Tenaga Kerja Sabah as below:</p> <ul style="list-style-type: none"> a. S/N: 600-1/2/13/9(08/SDK/2018-0172) for overtime limit to 120 hours per month which valid from 18/5/2018 – 17/5/2020. b. License No.: JTK.H.SDK.600-4/1/1/10401/005609 for employment of non-resident which valid from 28/4/2018 – 27/4/2019. c. S/N: 600-1/2/13/9(11/SDK/2018-0380) for deduction of salary for medical fee and purchase of buffalo which valid from 10/12/2018 – 9/12/2020. <p>All legal requirement has documented in Legal Requirement Register. Refer doc no. SMP-GPB-22 rev. 06 dated 31 Jan 2019. The latest review included the Minimum Wages Order 2018.</p> <p>Compliance to each applicable law and regulation is monitored by the operating units through List of License, Permits and Approval Certificates. Refer document no. SP-MGR-03-F02-01. Latest review was conducted on 6/3/2019.</p> <p>Sighted the sampled evidence of compliancy to the regulation as follows:</p> <p><u>GSOM</u></p> <ul style="list-style-type: none"> i. MPOB License no. 500002804000 for processing 96000 ton FFB. Validity period from 1/11/2018 till 31/10/2019 ii. • DOE Licence/ Jadual Pematuhan: 001878, JPKKS/12/001878 for 20 MT/hr. Method of effluent disposal/discharge is land application. Validity period 1/7/2018 - 30/6/2019. iii. 'Pemasangan Persendirian' License no. 33024 for electricity supply 1855 kilowatt. Validity period 1/1/2019 - 31/12/2019. 	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>iv. 'Permit Sekatan Kerja Lebih Masa' no. 600-1/2/13/9(08/SDK/2018-0172) for maximum overtime work at 120 hours per month. Validity period 18/5/2018 - 17/5/2020.</p> <p>v. Competent Person for Authorised Entrant and Standby Person for Confined Space: Card no. NW-NSDK-AE-0091. Validity till 4/4/2019</p> <p><u>GSPE</u></p> <p>i. MPOB License no. 523495002000. Validity period from 1/10/2018 till 31/9/2019</p> <p>ii. MPOB Nursery License no. 574439011000. Validity period from 1/7/2018 till 36/10/2019</p> <p>iii. Certificate of Fitness for Air Compressor no PMT-SB/18 11734. Validity till 15/7/2019</p>	
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	<p>All legal requirement has documented in Legal Requirement Register. Refer doc no. SMP-GPB-22 rev. 06 dated 31 Jan 2019. The latest review included the Minimum Wages Order 2018.</p> <p>Compliance to each applicable law and regulation is monitored by the operating units through List of License, Permits and Approval Certificates. Refer document no. SP-MGR-03-F02-01. Latest review was conducted on 6/3/2019.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>2.1.3 A mechanism for ensuring compliance shall be implemented. - Minor compliance -</p>	<p>Genting Sabapalm Oil Mill continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and SD sustainability team. The CU had obtained and renewed license and permits as required by the law. The mill operates under MPOB license no 5000-280-0000 issued for period of 01/11/18-31/10/19. The license provides therein;</p> <ul style="list-style-type: none"> a) entitlement of <i>menjual and mengalih FFB</i> b) the total processed allowed is 96000 mt. <p>The total FFB processed in the entire year (1/11/17 – 31/10/18) is 115793.57mt exceeding 19793.57mt equivalent to 20.61% of the approved quantity. The mechanism for ensuring compliance to this license is ineffective. Hence an minor non-conformance raised.</p> <p>As described in the Procedure on regional, national and international Laws (doc: SMP-GPB-21; revision 1; issue on 14 Aug 2014), mechanism of tracking the changes of laws is contained in the legal requirements register.</p> <p>Compliance to each applicable law and regulation is monitored by the operating units through the Legal Requirement Register document no. SMP-GPB-22 rev. 06 and List of License, Permits and Approval Certificates and refer document no. SP-MGR-03-F02-01. Latest review was conducted on 31/1/2019 and 6/3/2019 respectively.</p>	<p>Minor nonconformance</p>

Criterion / Indicator	Assessment Findings	Compliance
2.1.4 A system for tracking any changes in the law shall be implemented. - Minor compliance -	<p>Sustainability Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p><u>GSOM</u> The mill has appointed the Asst. Manager as person responsible for updating changes in laws as per appointment letter dated 1/1/2018 signed by the Mill Manager.</p> <p><u>GSPE</u> The estate has appointed the Chief Clerk as person responsible for updating changes in laws as per appointment letter dated 6/8/2011 signed by the Mill Manager.</p>	<p>Complied</p>
<p>Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p>		

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Criterion / Indicator	Assessment Findings	Compliance																				
<p>2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -</p>	<p>The mill operates on legal ownership of land. Details as follows;</p> <ul style="list-style-type: none"> a) Land title no 085109977 – Land Ordinance CAP 68 Section 109 Scheduled XVII. Plan no 08126934 6B JJ. b) Provisional lease no 236 dated 08/10/1889. c) District of <i>Labuk & Suguli</i> Locality Kampung Klagan <ul style="list-style-type: none"> - Geocode 6866010000/6856900000/6856810000/685692000 d) Memorial no 115365, 00162676, 00153688 e) Period from 01/01/1987-31/12/2085. <p>Similarly the estate is operated on a legal ownership of land. Details as provided below;</p> <table border="1" data-bbox="1021 815 1816 1050"> <thead> <tr> <th>No</th> <th>Title no. Lease</th> <th>Ha</th> <th>Lease period</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>08510997</td> <td>2118.12</td> <td>10/7/1888-10/7/2887 - 999 years</td> </tr> <tr> <td>2</td> <td>08510996</td> <td>1957.46</td> <td>10/7/1888-10/7/2887 - 999 years</td> </tr> <tr> <td>3</td> <td>085319231</td> <td>283</td> <td>01/1/1987-31/12/2085</td> </tr> <tr> <td></td> <td>total</td> <td>4358.58</td> <td></td> </tr> </tbody> </table> <p>The land is for the purpose of cultivation of oil palm. All documents were sighted and verified.</p>	No	Title no. Lease	Ha	Lease period	1	08510997	2118.12	10/7/1888-10/7/2887 - 999 years	2	08510996	1957.46	10/7/1888-10/7/2887 - 999 years	3	085319231	283	01/1/1987-31/12/2085		total	4358.58		<p>Complied</p>
No	Title no. Lease	Ha	Lease period																			
1	08510997	2118.12	10/7/1888-10/7/2887 - 999 years																			
2	08510996	1957.46	10/7/1888-10/7/2887 - 999 years																			
3	085319231	283	01/1/1987-31/12/2085																			
	total	4358.58																				

Criterion / Indicator	Assessment Findings	Compliance
2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	<p>The Estate has maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers the estate visited at the following points confirmed that they were clearly marked and maintained.</p> <ul style="list-style-type: none"> a) OP2011 Block 98 boundary to <i>Styland Plantations Masih Jaya Estate</i> b) OP 2013 Block 35A adjacent to <i>Kg Klagan</i>. <p>The mill is separated through fencing around the vicinity. The effluent ponds are located at a distance from the processing area as larger space is required. The mill is located within the host estate belonging to the same parent company and of same certification unit.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
2.2.3 Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	<p>There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified. Interviewed with the neighboring plantations confirmed that no land dispute reported. Pegging and legal boundary stones were sighted to demarcate the boundary.</p> <p>There was a meeting conducted with the smallholders that overplanted in the land of GSPE on 25/2/2019. During the meeting, the Sustainability Manager has explained to the smallholders regarding the encroachment land and informed the smallholders that they will continue to maintain current situation with terms that they are not allowed to expand the area and construction of any new buildings. The smallholders have also asked some questions during the meeting and replied by the Sustainability Manager on the spot. Conclusion, the smallholders agreed and understood the outcome of discussion and have acknowledged on the minute received. Besides, a map of underplanted area has developed with indicated the acreage and smallholders that occupied the respective land. Furthermore, as to area statement of February 2019, the estate has identified the underplanted area for total 3.04 ha. Thus, the corrective action was effectively implemented and the minor non-conformity raised was closed on 12/3/2019.</p>	<p>Complied</p>
2.2.4 There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	<p>The previous encroachment of land by smallholders into the underplanted land of the company was resolved with the meeting conducted on 25/2/2019 with the acceptance by both parties to remain the current situation with terms and conditions.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	The estate management has identified the area of encroachment by smallholders in the estate’s mapping with total acreage of each smallholder that involved in the encroachment.	Complied
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	No evidence that palm oil operations have instigated violence in maintaining peace and order, in fact, Genting Sabaplam Estate Sapi Division fully allowed the parties to continue operation as usual on its land. There was a meeting conducted with the smallholders that overplanted in the land of GSPE on 25/2/2019. During the meeting, the Sustainability Manager has explained to the smallholders regarding the encroachment land and informed the smallholders that they will continue to maintain current situation with terms that they are not allowed to expand the area and construction of any new buildings. The smallholders have also asked some questions during the meeting and replied by the Sustainability Manager on the spot. Conclusion, the smallholders agreed and understood the outcome of discussion and have acknowledged on the minute received.	Complied
Criterion 2.3:			
Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	The estate management has identified the area of encroachment by smallholders in the estate’s mapping with total acreage of each smallholder that involved in the encroachment.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>2.3.2</p> <p>Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include:</p> <p>a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making;</p> <p>b) Evidence that the company has respected communities’ decisions to give or withhold their consent to the operation at the time that this decision was taken;</p> <p>c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company’s title, concession or lease on the land.</p> <p>- Minor compliance -</p>	<p>There was a meeting conducted with the smallholders that overplanted in the land of GSPE on 25/2/2019. During the meeting, the Sustainability Manager has explained to the smallholders regarding the encroachment land and informed the smallholders that they will continue to maintain current situation with terms that they are not allowed to expand the area and construction of any new buildings. The smallholders have also asked some questions during the meeting and replied by the Sustainability Manager on the spot. Conclusion, the smallholders agreed and understood the outcome of discussion and have acknowledged on the minute received.</p>	<p>Complied</p>
<p>2.3.3</p> <p>All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>-Minor compliance</p>	<p>There was a meeting conducted with the smallholders that overplanted in the land of GSPE on 25/2/2019. During the meeting, the Sustainability Manager has explained to the smallholders regarding the encroachment land and informed the smallholders that they will continue to maintain current situation with terms that they are not allowed to expand the area and construction of any new buildings. The smallholders have also asked some questions during the meeting and replied by the Sustainability Manager on the spot. Conclusion, the smallholders agreed and understood the outcome of discussion and have acknowledged on the minute received.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	There was a meeting conducted with the smallholders that overplanted in the land of GSPE on 25/2/2019. During the meeting, the Sustainability Manager has explained to the smallholders regarding the encroachment land and informed the smallholders that they will continue to maintain current situation with terms that they are not allowed to expand the area and construction of any new buildings. The smallholders have also asked some questions during the meeting and replied by the Sustainability Manager on the spot. Conclusion, the smallholders agreed and understood the outcome of discussion and have acknowledged on the minute received.	Complied
Principle 3: Commitment to long-term economic and financial viability			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			

<p>3.1.1</p>	<p>A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -</p>	<p>The Mill budget component comprises of the following; a) FFB processed / CPO/CPK production b) General Charges - Supervision/Office & admin expenses - Indirect labour c) Processing d) Despatch The business plan comprises established for horizon 2019-2022. a) Crop intake. b) Processing cost RM/mt c) Extraction rates. d) CAPITAL expenditures. Similarly, the estate audited possessed a similar budget format. Inclusive there is also a 5-year budget/forecast financial plan 2019-2023 allocating categories among others; a) Crop yielding area b) Mature cost - Weeding/drainage/pest/ - Supplying/roads/bridges/paths/TAS Road/ - Terracing/pruning/sanitation c) Manuring/harvesting & Collection/Weeding d) Transportation /depreciation/General Charges e) Cost/ha & cost /mt FFB f) CAPEX Separately the cost of immature areas is also shown which among others comprises of the following items; a) Labour statement / Allocation of wages / Labour benefit summary b) Yield statement oil palm c) Summary of vehicle and running schedule / Job allocation for vehicles d) Summary of workshop running schedule</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings					Compliance	
		e) Summary of budget f) Summary of general charges g) CAPEX The five years planning horizon 2019-2023 is available.						
			Forecast 2019	2020	2021	2022	2023	
		1	Mature Ha	3446.97	3452.92	3681.11	3425.63	3582.50
		2	FFB / Mt	93137	95720	102408	91612	93927
		3	YPH	27.02	27.72	27.82	26.74	26.22
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	The replanting programs for the estate are compiled as follows. The program is reviewable on an annual basis which is subject to amendment. All figures in hectares otherwise stated.					Complied	
		No	Year	2019	2020	2021	2022	2023
		1	Ha	229	94	0	154	101
Principle 4: Use of appropriate best practices by growers and millers								
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.								

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.1.1 Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p>	<p>The estates and mills are guided by the following manuals</p> <ul style="list-style-type: none"> a) Genting Plantations Oil Palm Manual OPM issued on 9/11/99 updated June 2013. <ul style="list-style-type: none"> - Land preparation/nursery/planting/soil conservation/ - Pest & Disease/weeding/fertiliser application/harvesting - Managing difficult soils/crop forecast b) Sustainability Management Procedure Manual 1/8/13 revised in 7/2/19. c) OSH Manual dated 1/1/2010. d) Environmental Control Procedure – 01/9/2018 e) Store Operating Manual – 2014 f) Standard Operating Procedure Malaysia Estates rev 2 Dec10 rev 3 Oct 13. g) Jobs description - 2012 <p>The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections</p> <ul style="list-style-type: none"> a) OPM No 7. Manuring of oil palm b) OPM no 13. Managing difficult soils <p>The estate and mill operations were guided through the manuals and SOPs. The procedures as documented in the manuals and SOPs were disseminated to the staff/workers through morning briefings and trainings. The manuals are kept in the main office for references of employees particularly for the supervisory personnel. Field inspection and interviews with the workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs. The SOPs included the operation activities in the estates and the mills from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and dispatch of CPO & PK and security in the CU.</p>	<p>Complied</p>

<p>4.1.2</p>	<p>A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -</p>	<p>The mechanisms to check the implementation of procedures were made among others through;</p> <ul style="list-style-type: none"> a) internal audit, safety and health meeting b) Routine inspection (workplace inspection) by Assist Manager, staff and hospital assistant. c) Inspection and advisory visits by Sustainability and Safety department from HQ/Regional Office <p>Records of monitoring as shown in 4.1.3</p> <p><u>GSOM & GSPE:</u> According to the Procedure of Social Management, Doc. No. SMP-GPB-32, Rev. 00 dated 18/1/2018, Section 6.8.2, Workers' Committee meeting shall be conducted at least quarterly or whenever necessary. However, the last meetings were conducted on 25/1/2019 and 24/3/2018 in GSOM and 12/2/2019 and 26/1/2018 in GSPE.</p> <p><u>GSOM:</u> According to the Procedure of Social Management, Doc. No. SMP-GPB-32, Rev. 00 dated 18/1/2018, Section 6.6.5, Gender Committee meeting shall be conducted at least 6 months once or whenever necessary. However, meeting was conducted on yearly basis and the last meeting for Year 2018 was held on 10/1/2018 and 14/2/2019 for Year 2019 in GSOM.</p> <p><u>GSPE:</u> 1 (Employee No.: E11010) out of 22 workers sampled who is a FFB Checker found that she did not carry out her work as per the Procedure "Tugas Checker", Rev. 1 dated 2018 where she was supposed to ensure the FFBs were checked properly according to the quality of FFB and those off-grade FFB shall not be sent to the oil mill. However, there were some unripe FFBs were sent to oil mill on November 2018</p>	<p>Minor nonconformance</p>
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Criterion / Indicator		Assessment Findings	Compliance																								
		and February 2019 by verified through the payslip where deduction has been made according to the procedure. Hence an minor non-conformance raised.																									
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	The monitoring of the SOP implementation was closely made by the all levels of the supervisory personnel with records maintained and checked. Among others the records are; <ul style="list-style-type: none"> a) Daily production/work records for the core activities at the estates/mill b) field cost book, c) chemical consumption record d) mature/immature field work program <ul style="list-style-type: none"> - fertilizer application, - herbicide spraying, - rat baiting , - Harvesting and collection of FFB. All the above records were kept for a minimum period of 12 months	Complied																								
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	Records were maintained details among others as listed below; <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Supplier</th> <th>Date</th> <th>Vehicle no</th> <th>driver</th> <th>Weight</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Abd Amit Itin</td> <td>6/2/19</td> <td>SS6687D</td> <td>NURAH</td> <td>1.83</td> </tr> <tr> <td>2</td> <td>Ahmad Kasran</td> <td>10/2/19</td> <td>SS7284C</td> <td>MARKUS</td> <td>3.27</td> </tr> <tr> <td>3</td> <td>Abdullah Yahya</td> <td>4/2/19</td> <td>SS329C</td> <td>DO154</td> <td>2.47</td> </tr> </tbody> </table>		Supplier	Date	Vehicle no	driver	Weight	1	Abd Amit Itin	6/2/19	SS6687D	NURAH	1.83	2	Ahmad Kasran	10/2/19	SS7284C	MARKUS	3.27	3	Abdullah Yahya	4/2/19	SS329C	DO154	2.47	Complied
	Supplier	Date	Vehicle no	driver	Weight																						
1	Abd Amit Itin	6/2/19	SS6687D	NURAH	1.83																						
2	Ahmad Kasran	10/2/19	SS7284C	MARKUS	3.27																						
3	Abdullah Yahya	4/2/19	SS329C	DO154	2.47																						
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.																											

Criterion / Indicator	Assessment Findings	Compliance																																			
<p>4.2.1 There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -</p>	<p>Fertiliser application program was monitored using records among others as described below;</p> <ul style="list-style-type: none"> a) program sheets, bin cards, b) Field cost book, fertiliser application monitoring forms, etc. c) Reconciliation of empty bags versus the issuance. <p>Records of programs and applications of fertilisers were reviewed by auditors. Review of the records showed that the actual fertilisers applied in 2018 were in line with the program.</p> <table border="1" data-bbox="1019 678 1758 917"> <thead> <tr> <th></th> <th>Field no</th> <th>Type</th> <th>Dosage</th> <th>Month</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>32</td> <td>NK Mix B</td> <td>3.25</td> <td>April</td> </tr> <tr> <td></td> <td></td> <td>BRP</td> <td>1.50</td> <td>May</td> </tr> <tr> <td></td> <td></td> <td>Kieserite</td> <td>1.50</td> <td>Aug</td> </tr> <tr> <td>2</td> <td>52</td> <td>NK Mix B</td> <td>2.50</td> <td>April</td> </tr> <tr> <td></td> <td></td> <td>BRP</td> <td>1.75</td> <td>May</td> </tr> <tr> <td></td> <td></td> <td>Kieserite</td> <td>2.25</td> <td>Aug</td> </tr> </tbody> </table>		Field no	Type	Dosage	Month	1	32	NK Mix B	3.25	April			BRP	1.50	May			Kieserite	1.50	Aug	2	52	NK Mix B	2.50	April			BRP	1.75	May			Kieserite	2.25	Aug	<p>Complied</p>
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<p>4.2.2 Records of fertiliser inputs shall be maintained. - Minor compliance -</p>	<p>Periodic tissue and soil sampling were carried out in the estate to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. Soil samplings are made on a 5 year cycle to detect the following analysis. The recent sampling was made on 15/10/18-10/11/18</p> <ul style="list-style-type: none"> a) PH, Carbon b) Total N, P, K, Ca, Mg, Na <p>Foliar analysis by <i>Genting Research Plantations Centre</i> was carried out on 18/5/18 to facilitate the 2019 fertilizer programme</p>	<p>Complied</p>																																			

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4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	<p>The estate applies decanter cake, EFB and effluent being land application having records as follows;</p> <table border="1"> <thead> <tr> <th></th> <th>Nutrient</th> <th>mt (entire 2018)</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>EFB</td> <td>12599.60</td> <td>629.98</td> </tr> <tr> <td>2</td> <td>Effluent</td> <td>Furrow</td> <td>P17/16</td> </tr> <tr> <td>3</td> <td>Decanter cake</td> <td>2407.94</td> <td>174.72</td> </tr> </tbody> </table> <p>Guidelines for EFB application adopted by the estate at rate of mature 25mt/ha. immature at 20mt/ha.</p>		Nutrient	mt (entire 2018)	Ha	1	EFB	12599.60	629.98	2	Effluent	Furrow	P17/16	3	Decanter cake	2407.94	174.72	Complied																			
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4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	<p>Fertiliser application program was monitored using records among others as described below;</p> <ul style="list-style-type: none"> d) program sheets, bin cards, e) Field cost book, fertiliser application monitoring forms, etc. f) Reconciliation of empty bags versus the issuance. <p>Records of programs and applications of fertilisers were reviewed by auditors. Review of the records showed that the actual fertilisers applied in 2018 were in line with the program.</p> <table border="1"> <thead> <tr> <th></th> <th>Field no</th> <th>Type</th> <th>Dosage</th> <th>Month</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>32</td> <td>NK Mix B</td> <td>3.25</td> <td>April</td> </tr> <tr> <td></td> <td></td> <td>BRP</td> <td>1.50</td> <td>May</td> </tr> <tr> <td></td> <td></td> <td>Kieserite</td> <td>1.50</td> <td>Aug</td> </tr> <tr> <td>2</td> <td>52</td> <td>NK Mix B</td> <td>2.50</td> <td>April</td> </tr> <tr> <td></td> <td></td> <td>BRP</td> <td>1.75</td> <td>May</td> </tr> <tr> <td></td> <td></td> <td>Kieserite</td> <td>2.25</td> <td>Aug</td> </tr> </tbody> </table>		Field no	Type	Dosage	Month	1	32	NK Mix B	3.25	April			BRP	1.50	May			Kieserite	1.50	Aug	2	52	NK Mix B	2.50	April			BRP	1.75	May			Kieserite	2.25	Aug	Complied
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Criterion 4.3: Practices minimise and control erosion and degradation of soils.																																																			
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	<p>The soil series for the estate comprises of the following. Soil maps are prepared by <i>Genting Research Centre Sabah</i>. The date of map preparation was established on 22/11/18.</p> <table border="1"> <thead> <tr> <th></th> <th>Soil type</th> <th>ha</th> <th>%</th> <th></th> <th>Soil</th> <th>ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Lokam</td> <td>282.14</td> <td>6.47</td> <td>6</td> <td>Tuaran</td> <td>81.68</td> <td>1.87</td> </tr> <tr> <td>2</td> <td>Lungmanis</td> <td>201</td> <td>4.61</td> <td>7</td> <td>Weston</td> <td>223.36</td> <td>5.12</td> </tr> <tr> <td>3</td> <td>Kinabatangan</td> <td>917.26</td> <td>21.04</td> <td>8</td> <td>Klias</td> <td>654.90</td> <td>15.03</td> </tr> <tr> <td>4</td> <td>Sapi</td> <td>679.4</td> <td>15.59</td> <td>9</td> <td>Brantian</td> <td>1051</td> <td>24.11</td> </tr> <tr> <td>5</td> <td>Dalit</td> <td>267.84</td> <td>6.15</td> <td></td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table> <p>Klias soil type is categorized under peat series</p>		Soil type	ha	%		Soil	ha	%	1	Lokam	282.14	6.47	6	Tuaran	81.68	1.87	2	Lungmanis	201	4.61	7	Weston	223.36	5.12	3	Kinabatangan	917.26	21.04	8	Klias	654.90	15.03	4	Sapi	679.4	15.59	9	Brantian	1051	24.11	5	Dalit	267.84	6.15		-	-	-	Complied
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<p>4.3.2 A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -</p>	<p>The estate had also implemented prevention of soil erosion measures such as construction of moisture conservation pits (MCP) in steep slope areas. Cover crops were observed to be in place as the CU management had generally encouraged the establishment of soft growth. Visits to the site found that significant areas of the ground were covered with <i>Neprolepis biserrata</i>. Most slopes had well established <i>Mucuna.bracteata</i>. The topography details of the estate is shown below;</p> <table border="1" data-bbox="1021 687 1592 991"> <thead> <tr> <th></th> <th>Terrain classes / degree</th> <th>Ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Flat 0-2</td> <td>3504.01</td> <td>80.43</td> </tr> <tr> <td>2</td> <td>Undulating 2-6</td> <td>780.22</td> <td>17.91</td> </tr> <tr> <td>3</td> <td>Rolling 6-12</td> <td>72.59</td> <td>1.67</td> </tr> <tr> <td>4</td> <td>Hilly 12-20</td> <td>0</td> <td>0</td> </tr> <tr> <td>5</td> <td>Steep 20-25</td> <td>0</td> <td>0</td> </tr> <tr> <td>6</td> <td>Very steep >25</td> <td>0</td> <td>0</td> </tr> <tr> <td></td> <td>total</td> <td>4356.82</td> <td>100.00</td> </tr> </tbody> </table>		Terrain classes / degree	Ha	%	1	Flat 0-2	3504.01	80.43	2	Undulating 2-6	780.22	17.91	3	Rolling 6-12	72.59	1.67	4	Hilly 12-20	0	0	5	Steep 20-25	0	0	6	Very steep >25	0	0		total	4356.82	100.00	<p>Complied</p>
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<p>4.3.3 A road maintenance programme shall be in place. - Minor compliance -</p>	<p>During the field visit, it was observed that the main and field roads were in satisfactory condition and accessibility was made possible by regular maintenance. There was evidence of road maintenance programmes which consist of the following works</p> <ul style="list-style-type: none"> a) road resurfacing with grading & compaction b) culvert maintenance, c) Road side pruning. d) Planting of <i>Guatemala /vertivar</i> grasses <p>Work schedule were staggered into various fields and months. Concentration of timing is targeted in Jan – May avoiding the monsoon months. Duration of work stretched from Jan – Dec priority wok to be carried out during the dry months.</p>	<p>Complied</p>

<p>4.3.4</p>	<p>Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -</p>	<p>GSPE had an area of 654.90 ha of peat soil. This is witnessed in the soil map and site visit in field no P2010. The following monitoring/management was observed;</p> <p>a) Point of measuring the subsidence taken annually at 2 points in the estate peat area. Records shown below.</p> <table border="1" data-bbox="1019 555 1529 691"> <thead> <tr> <th></th> <th>Date/year</th> <th>Point 2</th> <th>Point 1</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>27/9/18</td> <td>0</td> <td>0</td> </tr> <tr> <td>2</td> <td>27/9/17</td> <td>0</td> <td>0</td> </tr> <tr> <td>3</td> <td>27/9/16</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p>b) Ground water management</p> <p>Colour coding being used in the stick measurement to indicate the marking level (severity) of water level. Piezometer –fields water table monitoring</p> <table border="1" data-bbox="1019 885 1547 1053"> <thead> <tr> <th></th> <th>Colour code</th> <th>Depth range - soil surface</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Yellow</td> <td>0-50</td> </tr> <tr> <td>2</td> <td>Green</td> <td>51-75</td> </tr> <tr> <td>3</td> <td>red</td> <td>76-150</td> </tr> </tbody> </table> <p>The records made in Dec 18/Jan 19 as shown below. Figures in cm otherwise stated. Data taken on weekly basis.</p> <table border="1" data-bbox="1019 1166 1814 1337"> <thead> <tr> <th></th> <th>Field no</th> <th>3/3/19</th> <th>16/2/19</th> <th>15/12/18</th> <th>22/12/18</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Point 1</td> <td>70</td> <td><i>Flood</i></td> <td>70</td> <td>70</td> </tr> <tr> <td>2</td> <td>Point 2</td> <td>70</td> <td><i>Flood</i></td> <td>70</td> <td>70</td> </tr> <tr> <td>3</td> <td>Point 3</td> <td>60</td> <td><i>Flood</i></td> <td>65</td> <td>65</td> </tr> <tr> <td>4</td> <td>Point 4</td> <td>60</td> <td><i>flood</i></td> <td>65</td> <td>65</td> </tr> </tbody> </table>		Date/year	Point 2	Point 1	1	27/9/18	0	0	2	27/9/17	0	0	3	27/9/16	0	0		Colour code	Depth range - soil surface	1	Yellow	0-50	2	Green	51-75	3	red	76-150		Field no	3/3/19	16/2/19	15/12/18	22/12/18	1	Point 1	70	<i>Flood</i>	70	70	2	Point 2	70	<i>Flood</i>	70	70	3	Point 3	60	<i>Flood</i>	65	65	4	Point 4	60	<i>flood</i>	65	65	<p>Complied</p>
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4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	The Estate assessment on the peat drain ability was conducted on 02/3/19 by GPRC Assist Manager – Agronomy which is aimed to study the; <ul style="list-style-type: none"> a) drain ability of peat soil b) historical yield record c) viability of planting oil palm in peat area The conclusion made therein; <ul style="list-style-type: none"> a) The peat drain ability is in place b) The practices in ground had alleviated and managed well the water table and drain ability. The YPH performance provides evident that with proper practices cultivating palm in peat as GSRE had proven to be viable	Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	This is in practice as the fertiliser application for the peat areas was formulated during the Agronomist visits. Included in the initiatives are the water management efforts and the subsidence level monitoring.	Complied
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.			

<p>4.4.1</p>	<p>An implemented water management plan shall be in place. - Minor compliance -</p>	<p><u>GSOM</u> The mill has established water management plan and documented in Environmental Improvement and Management Plan under section Water Pollution and Water Management Plan for Raw Water and Drinking Water. Latest review was conducted on 12/2/2019 and 21/2/2019 respectively. In the management plan stated the source of the pollution, negative impacts, mitigation/improvement plan, and data monitored, person responsible and status of the plan.</p> <p>Sighted the implementation of the management plan as follows:</p> <p>i. River water analysis was conducted on monthly basis to monitor the pollution from the mill activities. Sighted the water analysis results for Labuk River for the month of October, November and December 2018. The results comply with NWQS.</p> <p>ii. Drinking water analysis should be conducted on quarterly basis as per Sustainability Management Procedure Manual. Refer document no. SMP-GPB-15. Noted during the document review, the mill on conducted the drinking water analysis once for FY 2018. Refer certificate of analysis no. 20180222-09-0. Thus indicates the Water Management Plan for Raw Water and Drinking Water were not effectively implemented.</p> <p>Hence an minor non-conformance raised.</p> <p><u>GSPE</u> The estate has established water management plan and documented in Environmental Improvement and Management Plan under section Water Quality and Water Management Plan. Latest review was conducted on 2/3/2019 and 11/2/2019 respectively. In the management plan stated the source of the pollution, negative impacts,</p>	<p>Minor nonconformance</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>mitigation/improvement plan, and data monitored, person responsible and status of the plan.</p> <p>Sighted the implementation of the management plan as follows:</p> <ul style="list-style-type: none"> i. River water sampling was conducted twice a year as per Sustainability Management Procedure Manual. Refer document no. SMP-GPB-15. Sighted the river water sampling analysis result dated 5/2/2018 and 18/9/2018 ii. Sighted during site visit at for Labuk River and Bengkawat River, the riparian buffer zone was clearly demarcated with red colour ring at the palm trunk. Sighted the signage of prohibition for chemical spraying, manuring, slashing, swimming and fishing erected at the riparian buffer zone. 	

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<p>4.4.2 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -</p>	<p>Genting Plantation has established Standard Operating Procedure for protection of water courses and documented in Sustainable Management Procedure Manual under section Riparian Buffer Zone Management. Refer document no SMP-GPB-14. Width of riparian buffer zone stated in the SOP as follows:</p> <table border="1" data-bbox="1025 560 1832 794"> <thead> <tr> <th rowspan="2">River Width</th> <th colspan="3">Riparian Reserve</th> </tr> <tr> <th>Peninsular</th> <th>Sabah</th> <th>Sarawak</th> </tr> </thead> <tbody> <tr> <td>> 40 meters</td> <td>50 meters</td> <td>50 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> <td>40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> <td>20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> <td>20 meters</td> <td>10 meters</td> </tr> <tr> <td>3 to 5 meters</td> <td>5 meters</td> <td>20 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>Sighted during site visit at for Labuk River and Bengkawat River, the riparian buffer zone was clearly demarcated with red colour ring at the palm trunk. Sighted the signage of prohibition for chemical spraying, manuring, slashing, swimming and fishing erected at the riparian buffer zone. No evidence of chemical application activity along the buffer zone. River water sampling was conducted twice a year as per Sustainability Management Procedure Manual. Refer document no. SMP-GPB-15. Sighted the river water sampling analysis result as follows: i. Report date: 5/2/2018 Report no: CK/MO411/340(i)-1/18 Result: Below and within the stipulated limit of NWQSM Class III ii. Report date: 18/9/2018 Report no: CK/MO411/340(i)-2/18 Result: Below and within the stipulated limit of NWQSM Class III</p>	River Width	Riparian Reserve			Peninsular	Sabah	Sarawak	> 40 meters	50 meters	50 meters	50 meters	20 to 40 meters	40 meters	40 meters	40 meters	10 to 20 meters	20 meters	20 meters	20 meters	5 to 10 meters	10 meters	20 meters	10 meters	3 to 5 meters	5 meters	20 meters	5 meters	<p>Complied</p>
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<p>4.4.3 Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -</p>	<p>Effluent discharge is 100% through land irrigation. Regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE accordingly. Sighted the Quarterly Return Form to DOE as follows:</p> <p>4th quarter:</p> <table border="1" data-bbox="1162 588 1695 927"> <thead> <tr> <th>Month</th> <th>Parameter</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Oct</td> <td>BOD</td> <td>240.00</td> </tr> <tr> <td>pH</td> <td>7.90</td> </tr> <tr> <td>SS</td> <td>1020.00</td> </tr> <tr> <td rowspan="3">Nov</td> <td>BOD</td> <td>122.00</td> </tr> <tr> <td>pH</td> <td>8.20</td> </tr> <tr> <td>SS</td> <td>495.00</td> </tr> <tr> <td rowspan="3">Dec</td> <td>BOD</td> <td>103.20</td> </tr> <tr> <td>pH</td> <td>8.00</td> </tr> <tr> <td>SS</td> <td>450.00</td> </tr> </tbody> </table> <p>3rd quarter:</p> <table border="1" data-bbox="1162 991 1695 1329"> <thead> <tr> <th>Month</th> <th>Parameter</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Jul</td> <td>BOD</td> <td>190.50</td> </tr> <tr> <td>pH</td> <td>8.50</td> </tr> <tr> <td>SS</td> <td>285.00</td> </tr> <tr> <td rowspan="3">Aug</td> <td>BOD</td> <td>230.50</td> </tr> <tr> <td>pH</td> <td>8.40</td> </tr> <tr> <td>SS</td> <td>360.00</td> </tr> <tr> <td rowspan="3">Sep</td> <td>BOD</td> <td>104.40</td> </tr> <tr> <td>pH</td> <td>8.10</td> </tr> <tr> <td>SS</td> <td>550.00</td> </tr> </tbody> </table> <p>All results were conform to the requirement stated in the Jadual Pematuhan.</p>	Month	Parameter	Results	Oct	BOD	240.00	pH	7.90	SS	1020.00	Nov	BOD	122.00	pH	8.20	SS	495.00	Dec	BOD	103.20	pH	8.00	SS	450.00	Month	Parameter	Results	Jul	BOD	190.50	pH	8.50	SS	285.00	Aug	BOD	230.50	pH	8.40	SS	360.00	Sep	BOD	104.40	pH	8.10	SS	550.00	<p>Complied</p>
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	SS	450.00																																																
Month	Parameter	Results																																																
Jul	BOD	190.50																																																
	pH	8.50																																																
	SS	285.00																																																
Aug	BOD	230.50																																																
	pH	8.40																																																
	SS	360.00																																																
Sep	BOD	104.40																																																
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	SS	550.00																																																

Criterion / Indicator	Assessment Findings	Compliance																												
4.4.4 Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	The mill monitor the consumption of water usage for per FFB processed. The water consumption for FY 2018 as follows: <table border="1" data-bbox="1025 459 1458 1158"> <thead> <tr> <th>Month</th> <th>Consumption</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>1.99</td></tr> <tr><td>Feb</td><td>2.04</td></tr> <tr><td>Mar</td><td>2.04</td></tr> <tr><td>Apr</td><td>2.07</td></tr> <tr><td>May</td><td>1.94</td></tr> <tr><td>Jun</td><td>2.10</td></tr> <tr><td>Jul</td><td>2.01</td></tr> <tr><td>Aug</td><td>2.05</td></tr> <tr><td>Sep</td><td>1.82</td></tr> <tr><td>Oct</td><td>1.72</td></tr> <tr><td>Nov</td><td>1.85</td></tr> <tr><td>Dec</td><td>1.79</td></tr> <tr><td>Average</td><td>1.92</td></tr> </tbody> </table>	Month	Consumption	Jan	1.99	Feb	2.04	Mar	2.04	Apr	2.07	May	1.94	Jun	2.10	Jul	2.01	Aug	2.05	Sep	1.82	Oct	1.72	Nov	1.85	Dec	1.79	Average	1.92	Complied
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Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.																														

Criterion / Indicator		Assessment Findings	Compliance																				
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	<p>The estate continued to implement Integrated Pest Management (IPM). The estates continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Oil Palm Manual OPM No 5 – Pest And Diseases The IPM program among others involved the following practices;</p> <ul style="list-style-type: none"> a) Includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. b) In order to minimize use of pesticides and bagworm control the estates had planted beneficial plants mainly <i>Tunera subulata</i>, <i>cassia cobanensis</i> and <i>Antigonon leptopus</i> with maps indicating areas planted. c) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year. Baiting was continued until bait acceptance fell below 20%. Barn Owl boxes are erected at ratio of 1: 10 ha to 1: 20 ha however the system was proven not viable in Sabah. 	Complied																				
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>Trainings were provided to the employees on the IPM management and procedures. Details as listed below.</p> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>19/2/19</td> <td>Rat Baiting</td> <td>13</td> </tr> <tr> <td>2</td> <td>15/2/19</td> <td>Pesticides Handlings</td> <td>30</td> </tr> <tr> <td>3</td> <td>9/3/19</td> <td>IPM management</td> <td>15</td> </tr> <tr> <td>4</td> <td>28/2/19</td> <td>Riparian Zone Protection</td> <td>19</td> </tr> </tbody> </table>		Date	Subject	Attendees	1	19/2/19	Rat Baiting	13	2	15/2/19	Pesticides Handlings	30	3	9/3/19	IPM management	15	4	28/2/19	Riparian Zone Protection	19	Complied
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<p>Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment</p>																							

Criterion / Indicator	Assessment Findings	Compliance																								
<p>4.6.1 Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -</p>	<p>All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II class III & class IV pesticides.</p> <ul style="list-style-type: none"> a) No illegal agrochemicals (stated by local and international laws) paraquat was used in their estates. b) The usage of the agrochemicals was based on the <i>Sustainability Management Procedure doc no SMP-GPB-28 titled Justification Of Pesticides Used</i> revised on 17/3/15. SOP and in the Pictorial Safety Standard Book where written justifications had been provided for various fields operations. <p>The Manual has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs.</p> <p>The chemicals used in the estate among others as shown below;</p> <table border="1" data-bbox="1021 911 1666 1179"> <thead> <tr> <th></th> <th>Product Name</th> <th>Name of chemical</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Ally</td> <td>Ally-metsulfuron methyl</td> <td>IV</td> </tr> <tr> <td>2</td> <td>Comet</td> <td>Triclopyr-2-botoxyethylester</td> <td>III</td> </tr> <tr> <td>3</td> <td>Supremo</td> <td>Glyphosate</td> <td>III</td> </tr> <tr> <td>4</td> <td>Ken Amine</td> <td>2,4D dimethylammonium</td> <td>II</td> </tr> <tr> <td>5</td> <td>Monex</td> <td>MSMA</td> <td>III</td> </tr> </tbody> </table>		Product Name	Name of chemical	Class	1	Ally	Ally-metsulfuron methyl	IV	2	Comet	Triclopyr-2-botoxyethylester	III	3	Supremo	Glyphosate	III	4	Ken Amine	2,4D dimethylammonium	II	5	Monex	MSMA	III	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.2 Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -</p>	<p>Sabapalm Estate had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available and verified. All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II, class III & class IV pesticides. No illegal agrochemicals (stated by local and international laws) in particular paraquat were used in their estates.</p>	<p>Complied</p>
<p>4.6.3 Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -</p>	<p>Sabapalm Estate is committed to minimize the usage of agrochemicals through the implementation of IPM practices among others;</p> <ul style="list-style-type: none"> a) The planting of beneficial plants i.e. <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i>. b) Blanket spraying was not practiced by this CU and soft grasses maintained in the field. It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the GENP Oil Palm Manual OPM No 6. Weeding Management c) No prophylactic use of such pesticides is permitted. d) Implementation of BOB barn owl boxes 	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.4 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -</p>	<p>The estate confined usage of pesticides which were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.</p> <ul style="list-style-type: none"> a) The review of the chemical register concluded that all pesticides used is were of class II, III & class IV. The use of paraquat had been prohibited in all GPSB estates. b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. c) Sighted from records and interviews with workers, staff and estate assistants, concluded that trainings were held with all precautions being taken and all legal requirements met. 	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance																												
<p>4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -</p>	<p>Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the pesticide. The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involve and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that SDS are available at all sites during the audit. Trainings on pesticide handling were available in all the visited estates. Among others extracted for records are;</p> <table border="1" data-bbox="1021 719 1686 991"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>5/3/19</td> <td>SOP Weeding / HIRARC</td> <td>10</td> </tr> <tr> <td>2</td> <td>21/2/19</td> <td>Spraying SOP</td> <td>10</td> </tr> <tr> <td>3</td> <td>15/2/19</td> <td>Pesticides Handlings</td> <td>30</td> </tr> <tr> <td>4</td> <td>12/2/19</td> <td>Chemical spraying</td> <td>30</td> </tr> <tr> <td>5</td> <td>30/1/19</td> <td>First Aid Kit & ERP handlings</td> <td>30</td> </tr> <tr> <td>6</td> <td>6/3/18</td> <td>Spraying activities SOP</td> <td>30</td> </tr> </tbody> </table> <p>The training included the safety aspects and usage of PPE when handling with pesticides. Record of training was available for verification. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. From interviews conducted with workers and staffs in the field and stores clerks it was established that they had been trained and were aware of safe handling procedures</p>		Date	Subject	Attendees	1	5/3/19	SOP Weeding / HIRARC	10	2	21/2/19	Spraying SOP	10	3	15/2/19	Pesticides Handlings	30	4	12/2/19	Chemical spraying	30	5	30/1/19	First Aid Kit & ERP handlings	30	6	6/3/18	Spraying activities SOP	30	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). <ul style="list-style-type: none"> a) Records of purchase, storage and use were maintained. b) All store buildings were equipped with exhaust fans with the door was secured. c) Only authorized personnel are assigned to handle the chemicals. d) All the chemicals were segregated in storage accordingly. Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Thereafter disposal arrangement will follow accordingly as per procedures.	Complied
4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	During the audit, it was noted that Sabapalm Estate/Mill had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions . <ul style="list-style-type: none"> a) Paraquat usage has been prohibited in all units and the entirety of the organization. b) The Safety Procedures for pesticides application were well described in Pictorial Safety Standard. The training included the safety aspects and usage of PPE when handling with pesticides. Record of training in relation to pesticides handlings as provided in 6.6.5 above.	Complied
4.6.8 Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	Aerial application of agrochemicals is not practiced in CU. This is confirmed through observation during the site visit, estate complex and interview with the employees.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	Training on pesticide/chemical handling was continuously carried out at the CU. The trainings included the safety aspects and usage of PPE when handling with pesticides and herbicides. From interviews with the staff and workers such as the storekeepers and workers who applied fertilizers, it was evident that they have been trained and understood the hazards involve and how the chemicals should be used in a safe manner. Records of training were sighted and given in 4.7.3.	Complied
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	Domestic wastes and recycle wastes were segregated by the workers. Only organic wastes were throw at the landfill. Recycle material such as cans, glass bottle, plastic bottle and paper were sent to recycle area.	Complied

<p>4.6.11</p>	<p>Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -</p>	<p>The Mill medical surveillance was conducted on 10/8/18 by an OHD: HQ/10/DOC/00/167. JKKP HIE 127/171-2(298)</p> <table border="1"> <thead> <tr> <th></th> <th>Category</th> <th>Total workers</th> <th>no</th> <th>Category</th> <th>Total workers</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water treatment</td> <td>1</td> <td>4</td> <td>Wireman</td> <td>1</td> </tr> <tr> <td>2</td> <td>Laboratory</td> <td>5</td> <td>5</td> <td>Store</td> <td>2</td> </tr> <tr> <td>3</td> <td>Engine room</td> <td>3</td> <td>6</td> <td>Workshop</td> <td>2</td> </tr> </tbody> </table> <p>Similarly the estate organised medical surveillance for the employees on 01/3/19 with details below.</p> <table border="1"> <thead> <tr> <th></th> <th>Category</th> <th>Total workers</th> <th>no</th> <th>Category</th> <th>Total workers</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Sprayer</td> <td>12</td> <td>4</td> <td>Pest & Disease</td> <td>12</td> </tr> <tr> <td>2</td> <td>Fertilizer applicator</td> <td>33</td> <td>5</td> <td>Driver</td> <td>4</td> </tr> <tr> <td>3</td> <td>Storekeeper</td> <td>1</td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="6">25/4/18</th> </tr> <tr> <th></th> <th>Category</th> <th>Total workers</th> <th>no</th> <th>Category</th> <th>Total workers</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Sprayer</td> <td>40</td> <td>4</td> <td>workshop</td> <td>2</td> </tr> <tr> <td>2</td> <td>Nursery</td> <td>7</td> <td>5</td> <td>Driver</td> <td>4</td> </tr> <tr> <td>3</td> <td>Storekeeper</td> <td>1</td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="6">24/8/18</th> </tr> <tr> <th></th> <th>Category</th> <th>Total workers</th> <th>no</th> <th>Category</th> <th>Total workers</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>workshop</td> <td>1</td> <td>4</td> <td>nursery</td> <td>1</td> </tr> </tbody> </table>		Category	Total workers	no	Category	Total workers	1	Water treatment	1	4	Wireman	1	2	Laboratory	5	5	Store	2	3	Engine room	3	6	Workshop	2		Category	Total workers	no	Category	Total workers	1	Sprayer	12	4	Pest & Disease	12	2	Fertilizer applicator	33	5	Driver	4	3	Storekeeper	1				25/4/18							Category	Total workers	no	Category	Total workers	1	Sprayer	40	4	workshop	2	2	Nursery	7	5	Driver	4	3	Storekeeper	1				24/8/18							Category	Total workers	no	Category	Total workers	1	workshop	1	4	nursery	1	<p>Complied</p>
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2	Sprayer	1	5						
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	All the estate and mill in the CU complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation whereby no work with pesticides is given to pregnant or breast-feeding women. <i>Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan</i>) The estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Hospital Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance	Complied						
Criterion 4.7:									
An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:									
4.7.1	A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -	<p>The Safety Policy signed the President /Chief Operating Procedure dated 01/7/18. Therein containing among others the following;</p> <ul style="list-style-type: none"> a) To maintain a safe and healthy working environment for all employees /others b) To comply with all applicable safety legislation, code of practice, requirement. c) Create awareness by providing all relevant information, WI, supervision and trainings to employees. d) Prevent accidents, injuries, and occupational illness as well as conduct investigations and take necessary steps/actions to ensure such accidents do not recur <p>All employees shall be responsible and accountable to achieve the abovementioned practices.</p>	Complied						

<p>4.7.2</p>	<p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p>	<p>The Mill had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following;</p> <ul style="list-style-type: none"> a) Change in work process b) Revision/changes in legislative requirement c) Occurrence of accidents <p>HIRARC for the mill was formalized on in 2008 with review made annually. The significant and routine activities for mill and estates were adequately covered with details as follows. HIRARC recently reviewed 16/2/19 made for the endorsement of the newly transferred Manager.</p> <table border="1" data-bbox="1019 813 1780 1152"> <thead> <tr> <th></th> <th>Subject</th> <th></th> <th>Subject</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Laboratory</td> <td>10</td> <td>Office</td> </tr> <tr> <td>2</td> <td>Excavator</td> <td>11</td> <td>Water treatment plant</td> </tr> <tr> <td>3</td> <td>Sterilizer</td> <td>12</td> <td>Fabrication FFB cages</td> </tr> <tr> <td>4</td> <td>Workshop</td> <td>13</td> <td>Heavy vehicles</td> </tr> <tr> <td>5</td> <td>Security</td> <td>14</td> <td>Boiler</td> </tr> <tr> <td>6</td> <td>Incinerator</td> <td>15</td> <td>clarification</td> </tr> <tr> <td>7</td> <td>FFB grading</td> <td>16</td> <td>Electrical</td> </tr> <tr> <td>8</td> <td>store</td> <td>17</td> <td>Effluent pond</td> </tr> <tr> <td>9</td> <td>Tools & equipment</td> <td>18</td> <td>CPO/CPK despatch</td> </tr> </tbody> </table> <p>The estate had list of review on HIRARC dated 16/3/18 to 25/1/19 within a committees meeting held on 25/1/19 attended by 2 estate personnel respectively.</p> <table border="1" data-bbox="1019 1316 1780 1380"> <thead> <tr> <th></th> <th>Areas/Activities</th> <th></th> <th>Areas /Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Palm /bunch census</td> <td>10</td> <td>Harvesting & collection</td> </tr> </tbody> </table>		Subject		Subject	1	Laboratory	10	Office	2	Excavator	11	Water treatment plant	3	Sterilizer	12	Fabrication FFB cages	4	Workshop	13	Heavy vehicles	5	Security	14	Boiler	6	Incinerator	15	clarification	7	FFB grading	16	Electrical	8	store	17	Effluent pond	9	Tools & equipment	18	CPO/CPK despatch		Areas/Activities		Areas /Activities	1	Palm /bunch census	10	Harvesting & collection	<p>Complied</p>
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		3	Confined space	12	Walking form palm to palm	
		4	Drainage machinery & manual	13	Loose fruit collection	
		5	Grass cutting	14	In field machine to 3mt bin	
		6	Compound sanitation	15	Water catchment	
		7	Fertilizer application	16	Chemical mixing	
		8	Replanting	17	Nursery	
		9	Bridge maintenance	18	Workers quarters	
		<p>Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were displayed at all work stations in the mill and estate office and workshop. In general, the control measures were appropriate to the identified risks.</p> <p>The mill CHRA was established in May 2015 conducted by <i>ENVOCHA SDN BHD JKPP HIE 127/171-2(160)</i>. Similarly the estate conducts CHRA last in Sept 2014. The forthcoming session has been scheduled 09/4/19. Assessor is M/s <i>Noormahani Harun JKPP HIE 127/171-2(154)</i>.</p>				

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.3 All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>- Minor compliance -</p>	<p>The mill issued PPE to its employees for their protection at workplace. Records of PPE issued are maintained individually to all employees. PPE issued to the workers is safety helmets, safety shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on annual basis and recorded. During the site visit the staff/workers were noted to be equipped with their proper attire & PPE. Acknowledgement of receipt was recorded. Based on the HIRARC carried out at the estate and mill the PPE types for the various activities has been identified and implemented.</p> <ul style="list-style-type: none"> a) Mill operator – Safety boots, ear muff, safety vest, helmet, cotton glove b) Water treatment Plant Operator - Safety boots, ear muff, safety vest, helmet, cotton glove, dust mask <p>The estate provides PPE to the employees such as apron, safety helmets, and safety shoes relevant to the work handled by the workers. Records of PPE issuance for both estates were sighted. During the site visit workers was observed to be in PPE. Based on the HIRARC carried out at the estates the PPE types for the various activities has been identified and implemented.</p> <ul style="list-style-type: none"> a) Harvester- Safety helmet, sickle cover, hand glove. wellington boots b) Sprayers- Respirator, nitrile glove (Chemical Resistant) goggles, wellington boots, apron. c) Manuring- Apron, wellington boots, dust mask, nitrile glove. d) Water treatment Plant Operator - Safety boots, ear muff, safety vest, helmet, cotton glove, dust mask. <p>Sighted issuance of PPE record for the following employees in 2018.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance																																																
<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>- Major compliance -</p>	<p>The mill and estate management conducts regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held are recorded below</p> <table border="1" data-bbox="1021 491 1816 628"> <thead> <tr> <th colspan="6">Mill</th> </tr> <tr> <th>No</th> <th>Date</th> <th>Attendees</th> <th>No</th> <th>Date</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>01/2/18</td> <td>17</td> <td>3</td> <td>01/9/18</td> <td>18</td> </tr> <tr> <td>2</td> <td>25/5/18</td> <td>18</td> <td>4</td> <td>10/12/18</td> <td>10</td> </tr> </tbody> </table> <table border="1" data-bbox="1021 660 1816 798"> <thead> <tr> <th colspan="6">Estate</th> </tr> <tr> <th>No</th> <th>Date</th> <th>Attendees</th> <th>No</th> <th>Date</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>20/12/19</td> <td>17</td> <td>3</td> <td>13/8/18</td> <td>16</td> </tr> <tr> <td>2</td> <td>16/11/18</td> <td>14</td> <td>4</td> <td>26/6/18</td> <td>16</td> </tr> </tbody> </table> <p>Agenda discussed;</p> <ul style="list-style-type: none"> a) Confirmation of minutes previous meeting b) Workplace inspection report c) Accident report d) Medial surveillance & Audiometric e) Status of Safety Program & Environmental f) First Aid Kit & Fire Extinguishers Report g) HIRARC h) Complaint from Employee/External Party. i) Other matters <p>Workplace inspections were made prior to the OSH meeting.</p> <p>The Mill Senior Assist Manager in-charge was appointed as Chairman through letter dated 13/2/19 signed by Vice President Processing (Sabah). Similarly the estate Senior Manager holds the position as the ESH Chairman through letter dated 16/5/18 signed by Vice President Plantations (Sabah Region 1). The letter was sighted and verified.</p>	Mill						No	Date	Attendees	No	Date	Attendees	1	01/2/18	17	3	01/9/18	18	2	25/5/18	18	4	10/12/18	10	Estate						No	Date	Attendees	No	Date	Attendees	1	20/12/19	17	3	13/8/18	16	2	16/11/18	14	4	26/6/18	16	<p>Complied</p>
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<p>4.7.5</p>	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -</p>	<p>The procedures for accident and emergencies has been established. There is formation of ERP Team & ERP for all the identified incidences. In addition the procedures have been summarised in a chart flow form and displayed for information of all employees in the mill. They includes emergencies relating fire, chemical spillage, oil spillage, effluent overflow.</p> <ul style="list-style-type: none"> a) <i>Ahli J/Kuasa Pasukan Bertindak Kecemasan 2019</i> headed by the respective Mill/Estate Managers b) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Kebakaran</i> c) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Minyak</i> d) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Kimia</i> e) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan effluen</i> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SD and amended to tailor to the situation differences in the estate and mill.</p> <table border="1" data-bbox="1019 1074 1554 1342"> <thead> <tr> <th></th> <th>Emergency situation</th> <th>Mill</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Fire</td> <td>/</td> <td>/</td> </tr> <tr> <td>2</td> <td>Oil spillage</td> <td>/</td> <td></td> </tr> <tr> <td>3</td> <td>Effluent overflow</td> <td>/</td> <td></td> </tr> <tr> <td>4</td> <td>Chemical spillage</td> <td>/</td> <td>/</td> </tr> <tr> <td>5</td> <td>Flood</td> <td></td> <td>/</td> </tr> <tr> <td>6</td> <td>Accident at work place</td> <td></td> <td>/</td> </tr> </tbody> </table>		Emergency situation	Mill	Estate	1	Fire	/	/	2	Oil spillage	/		3	Effluent overflow	/		4	Chemical spillage	/	/	5	Flood		/	6	Accident at work place		/	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance																				
		ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training.																					
4.7.6	All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -	The CU by the compliance to the newly enforced workers compensation Act had made coverage to the both local and foreign employees through SOCSO registration no (Mill - F97-000-5300Y) and estate (F97000052). The statement produced by both the estate and mill was sighted and verified.	Complied																				
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKPP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKPP 8 a mandatory requirement was submitted to DOSH on 10/1/19. Accident Statistics are being maintained in a satisfactory manner	Complied																				
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Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.																							

<p>4.8.1</p>	<p>A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -</p>	<p>The annual training program has been established and significantly covers all aspects of the RSPO requirements. There were also additional subjects including the mill operating procedures, parameters of mill produce, machinery maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects. The program mainly covers both requirement of the estate and mill in the CU. The subjects for the training are issued and assisted by the Sustainability Department. The following topics included in the annual training program 2019 among others are extracted below;</p> <table border="1" data-bbox="1019 715 1760 1377"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">(Mill) subject</th> <th colspan="3">schedule</th> </tr> <tr> <th>1-4</th> <th>5-9</th> <th>9-12</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Requirement ISO 9001/14001/18001</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>2</td> <td>ESH policy objective, target & program</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>3</td> <td>New FW – procedure</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>4</td> <td>Duties of production supervisor</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>5</td> <td>ESH role & function</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>6</td> <td>Competency, training & awareness</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>7</td> <td>ERP procedure and evacuation</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>8</td> <td>Legal & other requirement</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>9</td> <td>Permit to work/handling of tools equipment</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>10</td> <td>HIRARC & EAI</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>11</td> <td>Non Conformity corrective preventive action</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>12</td> <td>Complaint & grievance procedure</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>13</td> <td>SOP & ECP for individual procedure</td> <td></td> <td>/</td> <td></td> </tr> </tbody> </table>		(Mill) subject	schedule			1-4	5-9	9-12	1	Requirement ISO 9001/14001/18001	/			2	ESH policy objective, target & program	/			3	New FW – procedure	/			4	Duties of production supervisor	/			5	ESH role & function	/			6	Competency, training & awareness	/			7	ERP procedure and evacuation		/		8	Legal & other requirement		/		9	Permit to work/handling of tools equipment	/			10	HIRARC & EAI		/		11	Non Conformity corrective preventive action		/		12	Complaint & grievance procedure		/		13	SOP & ECP for individual procedure		/		<p>Complied</p>
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		20	Electrical main switch board			/
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Criterion / Indicator		Assessment Findings				Compliance
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		19	Noise training			/
		20	Electrical main switch board			/

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<p>4.8.2</p>	<p>Records of training for each employee shall be maintained. - Minor compliance -</p>	<p>Bulk of the mill training is organized during the daily briefing prior to work commencement of each shift. Mainly the issues discussed / briefed were related to mill process operations and safety compliance. These training records are maintained in a separate book and were sighted during the audit. The estate in similar holds training during muster and on ad hoc basis as per the work category grouping.</p> <table border="1" data-bbox="1019 587 1825 1391"> <thead> <tr> <th colspan="4">Genting Sabapalm Oil Mill</th> </tr> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>10/1/18</td> <td>Briefing of Company's Policies</td> <td>entire</td> </tr> <tr> <td>2</td> <td>1/2/18</td> <td>ESH committee members role</td> <td></td> </tr> <tr> <td>3</td> <td>7/2/18</td> <td>Management System procedures</td> <td>5</td> </tr> <tr> <td>4</td> <td>10/3/18</td> <td>Procedure handling new workers</td> <td>4</td> </tr> <tr> <td>5</td> <td>14/3/18</td> <td>OER standing instruction</td> <td>6</td> </tr> <tr> <td>6</td> <td>19/3/18</td> <td>Noise training</td> <td>1</td> </tr> <tr> <td>7</td> <td>1/9/18</td> <td>Complaint grievance procedure SOP</td> <td>Entire</td> </tr> <tr> <td>8</td> <td>1/10/18</td> <td>Fire briefing/talk & fire drill</td> <td>entire</td> </tr> <tr> <td>9</td> <td>1/10/18</td> <td>CPR – First Aid Response</td> <td>Entire</td> </tr> <tr> <td>10</td> <td>14/10/18</td> <td>Permit to work</td> <td>15</td> </tr> <tr> <td>11</td> <td>5-6/9/18</td> <td>Chemical spillage oil spillage ERP</td> <td>3</td> </tr> <tr> <td>12</td> <td>5/9/18</td> <td>SOP & SOM</td> <td>5</td> </tr> <tr> <td>13</td> <td>28/6/18</td> <td>MPD Analysis New Method</td> <td>5</td> </tr> <tr> <td>14</td> <td>12/4/18</td> <td>Legal other requirement</td> <td>6</td> </tr> <tr> <td>15</td> <td>19/2/18</td> <td>MSPO RSPO policy briefing</td> <td>Entire</td> </tr> <tr> <td>16</td> <td>19/2/18</td> <td>Recycling program SW management</td> <td>entire</td> </tr> <tr> <td>17</td> <td>18/10/18</td> <td>Green House Gas GHG V 11</td> <td>2</td> </tr> <tr> <td>18</td> <td>27/4/18</td> <td>Supply chain traceability & mass balance</td> <td>3</td> </tr> <tr> <td>19</td> <td>3/4/18</td> <td>Zero burning</td> <td>entire</td> </tr> </tbody> </table>	Genting Sabapalm Oil Mill					Date	Subject	Attendees	1	10/1/18	Briefing of Company's Policies	entire	2	1/2/18	ESH committee members role		3	7/2/18	Management System procedures	5	4	10/3/18	Procedure handling new workers	4	5	14/3/18	OER standing instruction	6	6	19/3/18	Noise training	1	7	1/9/18	Complaint grievance procedure SOP	Entire	8	1/10/18	Fire briefing/talk & fire drill	entire	9	1/10/18	CPR – First Aid Response	Entire	10	14/10/18	Permit to work	15	11	5-6/9/18	Chemical spillage oil spillage ERP	3	12	5/9/18	SOP & SOM	5	13	28/6/18	MPD Analysis New Method	5	14	12/4/18	Legal other requirement	6	15	19/2/18	MSPO RSPO policy briefing	Entire	16	19/2/18	Recycling program SW management	entire	17	18/10/18	Green House Gas GHG V 11	2	18	27/4/18	Supply chain traceability & mass balance	3	19	3/4/18	Zero burning	entire	<p>Minor nonconformance</p>
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20	20/7/18	Process station SOP & handlings	12
21	4/7/18	Process station SOP & handling	11
22	16/7/18	Workshop operations	13
23	6/7/18	Engine room operations	3
24	27/6/18	Security operations	5
25	27/6/18	FFB reception	6
Genting Sabapalm Estate			
	Date	Subject	Attendees
1	5/3/19	Fire Drill / Briefing	Entire
2	5/3/19	SOP Weeding / HIRARC	10
3	4/3/19	Company Policies Briefing	entire
4	1/3/19	Tractors driving SOP	10
5	21/2/19	Spraying SOP	10
6	21/2/19	Nursery Operations	10
7	20/2/19	Harvesting SOP	30
8	20/2/19	Fire Drill	Entire
9	19/2/19	Rat Baiting	13
10	18/2/19	Petron Lubes Product	21
11	15/2/19	Harvesting SOP	30
12	15/2/19	Machinery safe handlings	13
13	15/2/19	Pesticides Handlings	30
14	12/2/19	Chemical spraying	30
15	30/1/19	First Aid Kit & ERP handlings	30
16	9/3/19	IPM management	15
17	28/2/19	Riparian Zone Protection	19
18	19/2/19	Protection of HCV riparian zone	19
19	18/2/19	Fertilizer application at Riparian zone vicinity	13

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Criterion / Indicator		Assessment Findings				Compliance
		20	12/2/19	Riparian zone protection from chemical	7	
		21	6/3/18	Spraying activities SOP	30	
		22	9/3/18	Riparian Zone protection	28	
		23	23/10/18	New FW – Induction Program	5	
		24	19/9/18	New FW – Induction Program	5	
		25	21/8/18	New FW – Induction Program	4	
		<p>GSPE: During the field visit at Block 67 P2010 peat area, the accompanying team was unable to explain the procedure of the following; a) Water level reading b) Subsidence level recording.</p> <p>Hence, a minor non-conformance was raised.</p>				
<p>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</p>						
<p>Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>						

Criterion / Indicator	Assessment Findings	Compliance
5.1.1 An environmental impact assessment (EIA) shall be documented. - Major compliance -	<p><u>GSOM</u> The mill has conducted Environmental Impact Assessment to identify the environmental aspect for all operation. The assessment included the section, activities, control, environmental aspect, legal requirement, condition and environmental impact. The assessment documented in Environmental Aspect Impact Assessment. Refer document no. SP-MGR-02-F01-00. Latest review was conducted on 23/2/2019.</p> <p><u>GSPE</u> The estate conducted Environmental Impact Assessment to identify the environmental aspect in all estate activities and documented in Identification of Environmental Aspect and Impact and Evaluation of Significant Form. The activity evaluated in the assessment such as Pesticides Spraying, Harvesting, Manuring, Chemical Handling, Generator Set Maintenance, Vehicle Maintenance, Schedule Handling and etc. Latest review was conducted in February 2019.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>5.1.2 Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -</p>	<p><u>GSOM</u> The mill has established environmental management plan and documented in Environmental Improvement and Management Plan. Latest review was conducted on 12/2/2019. In the management plan stated the source of the pollution, negative impacts, mitigation/improvement plan, and data monitored, person responsible and status of the plan.</p> <p><u>GSPE</u> The estate has established the environmental management plan base on the EAI conducted and documented in the Environmental Improvement and Management Plan. Latest review was conducted on 2/3/2019. In the management plan stated the source of the pollution, negative impacts, mitigation/improvement plan, and data monitored and person responsible</p>	<p>Complied</p>

<p>5.1.3</p>	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p>	<p><u>GSOM</u> The mill has established environmental management plan and documented in Environmental Improvement and Management Plan. Latest review was conducted on 12/2/2019. In the management plan stated the source of the pollution, negative impacts, mitigation/improvement plan, and data monitored, person responsible and status of the plan. Pollution identified in the management plan such as Air Pollution, Water Pollution, Noise pollution, Soil Pollution, Greenhouse Gas Emission, Waste Management, Water Management and etc.</p> <p>Sighted the implementation as follows:</p> <p>Sighted the Station Monthly Checklist records for Laboratory, water treatment plan and steriliser station. In the checklist stated the environmental issue to be observed at the workstation such as no chemical spillage into the monsoon drain and no chemical spillage on the floor.</p> <p><u>GSPE</u> The estate has established the environmental management plan base on the EAI conducted and documented in the Environmental Improvement and Management Plan. In the management plan stated the source of the pollution, negative impacts, mitigation/improvement plan, and data monitored and person responsible. Pollution identified in the management plan such as Surface Water Runoff, Water Quality, Chemical Application, Air Quality/Zero Burning, Fertiliser Application and Waste Management.</p> <p>Sighted the implementation of the management plan as follow:</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		i. Sighted the records of periodic cleaning and desilting drain in General Work Order Requisition record book for the month of October, November 2018 and January 2019. ii. Sighted the monitoring records for recycle waste (3R) for the month of November, December 2018 and January 2019.	
Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.			
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance -	Genting Plantation has conducted HCV assessment for Genting Sabahpalm POM and Genting Sabahpalm Estate and documented in Inventory on HCV sites within Genting Plantation Bhd group estates (Sabah Region 1) by S.K. Yap Forestry and Landscape Advisory Services on Oct 2009 – July 2010. Only HCV 4.2, Labuk River and Bengkawat River and HCV 6, burial grounds for local communities within were identified in GSPE during the assessment.	Complied

Criterion / Indicator	Assessment Findings	Compliance
5.2.2 Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	There is no RTE or high biodiversity value at GSPE except for estuarine crocodiles found at Labuk River. The HCV management plan has been established. Latest review was conducted on 1/3/2019. Sighted the river riparian buffer zone at Labuk and Bengkawat River were clearly demarcated with red ring to show the distance of the buffer zone. Sighted the signage of prohibition for chemical spraying, manuring, slashing, swimming and fishing erected at the riparian buffer zone. No evidence of chemical application activity along the buffer zone. RTE signage erected at the estate entrance Training for riparian zone dated 28/2/2019, 19/2/2019, 18/2/2019, 12/2/2019, 9/3/2018 Training for HCV 19/2/2019	Complied
5.2.3 There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	There is no RTE or high biodiversity value at GSPE except for estuarine crocodiles found at Labuk River. Sighted the river riparian buffer zone at Labuk and Bengkawat River were clearly demarcated with red ring to show the distance of the buffer zone. Sighted the signage of prohibition for chemical spraying, manuring, slashing, swimming and fishing erected at the riparian buffer zone. No evidence of chemical application activity along the buffer zone.	Complied
5.2.4 Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	There is no RTE or high biodiversity value at GSPE except for estuarine crocodiles found at Labuk River. Sighted the river riparian buffer zone at Labuk and Bengkawat River were clearly demarcated with red ring to show the distance of the buffer zone. Sighted the signage of prohibition for chemical spraying, manuring, slashing, swimming and fishing erected at the riparian buffer zone. No evidence of chemical application activity along the buffer zone.	Complied

Criterion / Indicator		Assessment Findings	Compliance
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	Based on the assessment conducted by desktop, interview and field visits, it was verified that there has been no instance of HCV set aside that conflicts with cultural identify, basic needs for local communities and critical for water catchments at these estates.	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	<p><u>GSOM</u> The mill has identified all waste products and it source in all the mill operation and documented in the Identification, Segregation and Storage of Waste. The identification stated the source, type of waste generated and handling type. 22 source of waste were identified and documented. Latest review was conducted on 12/2/2019.</p> <p><u>GSPE</u> The mill has identified all waste products and it source in all the mill operation and documented in the Identification, Segregation and Storage of Waste. The identification stated the source, type of waste generated and handling type. 24 source of waste were identified and documented. Latest review was conducted on 5/3/2019.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
5.3.2	<p>All chemicals and their containers shall be disposed of responsibly.</p> <p>- Major compliance -</p>	<p>Empty chemical containers were identified as recycle waste and documented in Identification, Segregation and Storage of Waste. The empty chemical container were triple rinsed and puncture before send to approved contractors for recycling process.</p> <p>Sighted the inventory records empty chemical containers in Stock/Bin Card.</p>	Complied

<p>5.3.3</p>	<p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p>	<p><u>GSOM</u> The mill has established Waste Management Plan base on the waste identification conducted. In the management plan state the waste source, waste type, monitoring and action plan, data monitored, person responsible and status. Sighted the implementation as follows:</p> <p>Disposal of Scheduled Waste</p> <ul style="list-style-type: none"> i. 25/1/2019 for SW 102; C/N no: 2019012906GQOWRH ii. 25/1/2019 for SW 305; C/N no: 2019012907C2FUK iii. 25/1/2019 for SW 410; C/N no: 20190129072EX3P8 iv. 26/7/2018 for SW 102; C/N no: 20180726077F5DNO <p>Used PPE were identified as Scheduled Waste in the Identification, Segregation and Storage of Waste. Noted during interview with the storekeeper, as per mill practice, workers who requested to replace used PPE have to return the old PPE to be stored in the Scheduled Waste Store before disposed by licensed contractors. However, no evidence of used PPE inventory and disposal. This indicates the waste management plan is not effectively implemented.</p> <p><u>GSPE</u> The estate has established Waste Management Plan base on the waste identification conducted. In the management plan state the waste source, waste type, monitoring and action plan, data monitored, person responsible and status. Sighted the implementation as follows:</p> <ul style="list-style-type: none"> i. Spill kit were available at the chemical and Scheduled Waste Store. Noted during interview with the store keeper shows the understanding on the use of spill kit. Used spill kit were disposed as scheduled waste. ii. As per waste management plan, domestic waste schedule to be collected on weekly basis. Noted during document review in Landfill monitoring record book, the domestic waste for the month of December 2018, January and February 2019 were not collected as per 	<p>Minor nonconformance</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>scheduled. This show the waste management plan were not effectively implemented.</p> <p>Used PPE were identified as Scheduled Waste in the Identification, Segregation and Storage of Waste. Noted during interview with the storekeeper, as per estae practice, workers who requested to replace used PPE have to return the old PPE to be stored in the Scheduled Waste Store before disposed by licensed contractors. However, no evidence of used PPE disposal. This indicates the waste management plan is not effectively implemented.</p> <p>Hence, a minor non-conformance was raised.</p>	
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>			
5.4.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.</p> <p>- Minor compliance -</p>	<p><u>GSOM</u></p> <p>The mill monitored the diesel consumption per FFB processed on monthly basis. Sighted the records of diesel consumption FY 2018 as follows:</p> <p>i. Diesel usage per FFB FY 2018: 2.38L/ton FFB processed</p> <p>To reduce the diesel consumption, the mill optimised the usage of renewable fuel such as fiber and shell as boiler fuel. Sighted the records of renewable energy consumption FY 2018:</p> <p>i. Renewable energy usage per FFB FY 2018: 0.178 ton/ton FFB processed</p>	Complied
<p>Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>			

Criterion / Indicator		Assessment Findings	Compliance
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	Genting Plantations has established ASEAN Zero Burning Policy(1999) and the Environmental Quality (Declared Activities)(Open Burning) Order 2003 signed by the President and Chief Operating Officer dated 10/8/2011. The policy was communicated to all the employee through training, briefing and signage at several notice board in the estate.	Complied
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	Genting Plantations has established Standard Operating Procedure land preparation for replanting and documented in Oil Palm Manual. Refer document no. OPM 1: Land Clearing, Preparation, Planting and Legume Cover Establishment under section Palm to Palm Replanting. All felled palm will be shredded or chip and piled between planting rows. Sighted the implementation oat P18 block 3, sighted no evidence of fire used for land preparation during replanting. The land preparation done as per SOP established.	Complied
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			

<p>5.6.1</p>	<p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -</p>	<p><u>GSOM</u> The mill has conducted Environmental Impact Assessment to identify the environmental aspect for all operation. The assessment included the section, activities, control, environmental aspect, legal requirement, condition and environmental impact. The assessment documented in Environmental Aspect Impact Assessment. Refer document no. SP-MGR-02-F01-00. Latest review was conducted on 23/2/2019. The mill has established environmental management plan and documented in Environmental Improvement and Management Plan. Latest review was conducted on 12/2/2019. In the management plan stated the source of the pollution, negative impacts, mitigation/improvement plan, and data monitored, person responsible and status of the plan. Pollution identified in the management plan such as Air Pollution, Water Pollution, Noise pollution, Soil Pollution, Greenhouse Gas Emission, Waste Management, Water Management and etc.</p> <p><u>GSPE</u> The estate conducted Environmental Impact Assessment to identify the environmental aspect in all estate activities and documented in Identification of Environmental Aspect and Impact and Evaluation of Significant Form. The activity evaluated in the assessment such as Pesticides Spraying, Harvesting, Manuring, Chemical Handling, Generator Set Maintenance, Vehicle Maintenance, Schedule Handling and etc. Latest review was conducted in February 2019. The estate has established the environmental management plan base on the EAI conducted and documented in the Environmental Improvement and Management Plan. In the management plan stated the source of the pollution, negative impacts, mitigation/improvement plan, and data monitored and person responsible. Pollution identified in the management plan such as Surface Water Runoff, Water Quality,</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		Chemical Application, Air Quality/Zero Burning, Fertiliser Application and Waste Management.	
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	For the estate, GHG emissions identified including CO _x , SO _x and NO _x from various sources including fossil fuel, chemical, peat oxidation, sinks, crop sequestration, fertilizer consumptions and sequestration in conservation area. For mill, GHG emission identified from POME, fuel consumption and grid electricity utilization. Significant pollutants and greenhouse gas (GHG) emission reduction/minimization plan FY 2018 has been implemented to minimize the emission of GHG from diesel used by installation of SESB power supply. The installation has been completed as per letter dated 12/2/2019. Ref letter no. ACC/GEN/GSOM/19/02/135.	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 is used and the management opted for full version was applied. The report prepared in April 2018. These GHG calculations were done as per certification unit basics including 1 estate and mill. Summary of emissions for 2018: i) Emission/ mt CPO= 3.49 tCO ₂ e/mt CPO ii) Emission/ mt PK= 3.49 tCO ₂ e/mt PK Verification of some of the raw data such as diesel consumption, generation of POME and fertiliser applications showed that the data is authentic.	Complied

Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.

Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Social Impact Assessment (SIA) & Human Rights Impact Assessment (HRIM) was carried out on 6-8/4/2017 for both Genting Sabapalm Estate (GSPE) and Genting Sabapalm Oil Mill (GSOM) by Sustainability Department. The objective of the assessment was to assess change in social and environmental condition which subsequently have impacts on the people. The assessment has involved the participation of internal and external stakeholders. All the issues raised by the stakeholders during the assessment were recorded in the report. The next SIA will be tentatively conduct on July 2019. It could be further enhance by taking into consideration the negative and positive impacts of stateless dependent that staying inside the compound.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Seen the records of participation of internal and external stakeholders in the assessment process. Stakeholders such as HUMANA teacher, neighbouring villagers, government authorities such as DOSH, Suruhanjaya Tenaga Sandakan and clinic, FFB smallholders, school representatives and internal stakeholders such as owner of sundry shops, mandores and workers' representatives. Issues raised by the stakeholders were recorded in the report.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	GSOM has developed Social Management and Monitoring Plan dated 28/1/2019 to update the status of the issues discussed during the assessment. Apart from that, the mill management has developed another management plan to record all the complaints and requests raised by the stakeholders during stakeholder meeting dated 28/1/2019. The plan has updated the status accordingly. GSPE has developed Social Management and Monitoring Plan dated 8/3/2019 to update the status of the issues discussed during the assessment and feedbacks from stakeholder meeting. Besides, a social impact assessment & mitigation plan was developed as well dated 1/3/2019 to mitigate the identified social impacts might arise in the estate.	Complied
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	According to the Procedures for Social Management, Doc. No. SMP-GPB-32, Rev. 00 dated 18/1/2018 where the plan will be revised once every 2 years. However, the plan has been reviewed every year and the last reviewed was conducted on 28/1/2019 in GSOM and 1/3/2019 and 8/3/2019 in GSPE.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	Not applicable as there was no scheme smallholders involved in the certification unit.	Not applicable
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			

Criterion / Indicator	Assessment Findings	Compliance
6.2.1 Consultation and communication procedures shall be documented. - Major compliance -	Genting Plantations Berhad has developed Procedures for Consultation and Communication, Doc. No. SMP-GPB-17, Rev. 02 dated 23/2/2018 to ensure the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties. Communication is a two-way process and can be done via meetings, letters, email and other activities such as sport day or festival event.	Complied
6.2.2 A management official responsible for these issues shall be nominated. - Minor compliance -	Senior Assistant Manager of GSOM and Senior Manager of GSPE has been appointed as responsible person to handle matters of ISCC, RSPO, MSPO and others. The appointment letter dated 14/2/2019 from Vice President – Processing (Sabah) and 6/4/2017 from Vice President – Plantation (R1) was sighted.	Complied
6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	Stakeholder list was updated on yearly basis and the last reviewed was carried out on 21/2/2019 in GSOM. Stakeholders such as government authorities, local communities, FFB smallholders, contractors and suppliers were included into the list. Stakeholder meeting was conducted on 26/11/2018 for GSOM and GSPE. The stakeholders that attended the meeting were HUMANA’s teachers, contractors, transporters, suppliers, government authorities and FFB suppliers. Issues that raised by the stakeholder were recorded in the minutes and a management plan was developed to monitor the progress of issue. All the issues were resolved by verified the management plan and evidences. Besides, a meeting between the MPOB, FFB smallholders and management was held on 4/3/2019 to introduce and explain MSPO certification to the smallholders.	Complied
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.		

Criterion / Indicator	Assessment Findings	Compliance
6.3.1 The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	Genting Plantations Berhad has developed and implemented Complaints and Grievances procedure, Doc. No. SMP-GPB-19, Rev. 03 dated 21/3/2018 where the objective of the procedure is to provide guidelines on handling complaints and grievances raised by any stakeholders. Written complaints can be delivered to management anonymously by post, email or SMS or via the complaint and suggestion box located at the muster ground and office. All written confidential complaints will be dealt with confidentially by Manager and filed securely under Private and Confidential. Time frame for action to be taken depends on the severity of the complaints. The accepted time frame to acknowledge and respond to complaints is within 1 month upon receipt.	Complied
6.3.2 Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	GSOM and GSPE has implemented Complaints/ Grievances Record Book to record any complaints and grievances. The complainants have acknowledged on the complaint form after actions have been taken. Sampled of the complaints as below: <ul style="list-style-type: none"> a. Ref. No.: 060 dated 15/2/2019 in GSOM Issue: Toilet door was broken. Status: The door has been replaced on 15/2/2019 and verified through interviewed with the complainant confirmed that the defect has been rectified. b. Ref. No.: 039 dated 2/3/2019 in GSPE Issue: Staircase and the tables for students in HUMANA were broken. Status: The staircase and tables have been repaired on 2/3/2019 and HUMANA teacher has acknowledged on the work done. Site visit to the HUMANA school verified that the defects were rectified. 	Complied
Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.		

Criterion / Indicator	Assessment Findings	Compliance
6.4.1 A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	Genting Plantations Berhad has developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates, Doc. No. SMO-GPB-18 dated 29/12/2017. The procedure is to provide guidelines on handling the land issues/ boundary conflicts. Initial negotiation shall be carried out by affected estate’s management and the affected stakeholders. If negotiation fails, the issue will have forwarded to Legal Department and other relevant department in Head Office. Re-survey will be carried out by license surveyor for confirmation of boundary and compensation will make accordingly.	Complied
6.4.2 A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups’ proof of legal versus communal ownership of land. - Minor compliance -	SOP as per indicator 6.4.1.	Complied
6.4.3 The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	The estates and mill is surrounded by own estate and neighbouring smallholders. There was no land dispute except the under planted area by the company and encroached by the smallholders into the under planted area. Outcome of discussion as per Indicator 2.2.3.	Complied
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.		

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Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.1 Documentation of pay and conditions shall be available. - Major compliance -</p>	<p>Mill and estates have employed local and foreign workers. All the mill and estates workers are under direct employment. The payslip has included basic pay, allowances, working days, deduction of salary and overtime. Payslip for June 2018, November 2018 and February 2019 was sampled based on the crop summary as below:</p> <ul style="list-style-type: none"> a. Employee No.: E00170 (GSOM) b. Employee No.: E00184 (GSOM) c. Employee No.: E00254 (GSOM) d. Employee No.: E00059 (GSOM) e. Employee No.: E00248 (GSOM) f. Employee No.: E10850 (GSPE) g. Employee No.: E10093 (GSPE) h. Employee No.: E11056 (GSPE) i. Employee No.: E11076 (GSPE) <p>All the sampled workers have achieved the Minimum Wage Order 2016 and Minimum Wage Order 2018.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.2</p> <p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p>	<p>Employment contracts are available and explained in language that understood by workers. The contract was signed by the workers and sampled of contracts as below:</p> <ul style="list-style-type: none"> a. Employee No.: E00288 (GSOM) b. Employee No.: E00273 (GSOM) c. Employee No.: E00296 (GSOM) d. Employee No.: E00146 (GSOM) e. Employee No.: E00212 (GSOM) f. Employee No.: E10792 (GSPE) g. Employee No.: E11145 (GSPE) h. Employee No.: E11267 (GSPE) i. Employee No.: E11010 (GSPE) <p>Interviewed with the workers confirmed that they were understood on the terms and conditions outlined in the employment contract. They were also briefed on the terms and condition during induction training.</p> <p><u>Genting Sabapalm Estate:</u> The employment contract for all contractors' workers was not available in GSPE.</p> <p>Hence, a major non-conformance was raised.</p>	<p>Major nonconformance</p>

Criterion / Indicator	Assessment Findings	Compliance
6.5.3 Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –	Free medical assistant and HUMAN school was established and provided to the workers and the dependents. Basic welfare amenities such as community hall, free water and electricity supply was provided to the workers. Place of worship such as mosque, temple and church was available in the estate. GSOM has budgeted for total 7 blocks of 4 units of labour quarters to be constructed in Y2019. Site visit sighted the construction site in the housing area. GSPE has constructed 2 new blocks of workers’ quarters which consisted of 8 units of houses to the workers in Bangkawat Division. Besides, total 1 block of family quarter has been budgeted for Y2019 in Sapi Division.	Complied
6.5.4 Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food. - Minor compliance –	Interviewed with the workers confirmed that they are easily access to adequate and affordable foods. There are sundry shops in the estate’s compound and price was displayed at the goods and foods.	Complied
Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.		

Criterion / Indicator		Assessment Findings	Compliance
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	Genting Plantations Berhad has developed and implemented Social Policy dated 22/6/2015 where the company respects the rights of the employees and workers to join or form legal trade unions of their own choosing and to bargain collectively. The policy was in bilingual, Bahasa Malaysia and English. The policy was briefed to the workers on 19/2/2019 in GSOM and 4/3/2019 in GSPE. Interviewed with the workers confirmed that they were briefed by management and understood on the policy. Policy was displayed at the notice board outside the office.	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Workers' Welfare Committee was established in GSOM and GSPE which formed by different ethnics, divisions and genders of workers in the mill and estate. Seen the organization chart as at 15/2/2019. The last meetings were conducted on 25/1/2019 and 24/3/2018 in GSOM and 12/2/2019 and 26/1/2018 in GSPE. There was no issue raised during the meeting by the workers.	Complied
Criterion 6.7: Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Social Policy dated 22/6/2015 was established by the company. The company does not use any child labour in the plantations. They respect the children's rights. Interviewed with the workers confirmed that no children have been employed and work in the plantations. Document reviewed on the master list of employees confirmed that all the employees were above the age of 18.	Complied
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			

Criterion / Indicator	Assessment Findings	Compliance
6.8.1 A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	Genting Plantations Berhad has implemented Social Policy dated 22/6/2015 where the company does not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation. The policy was briefed to the workers on 19/2/2019 in GSOM and 4/3/2019 in GSPE. Policy was displayed at the notice board outside the office.	Complied
6.8.2 Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Verified the LintraMax system and payslips found that the company has recruited male and female workers, local and foreign workers. They were treated equally without any discrimination. They were paid according to legal requirements. Interviewed with the female and male workers confirmed that they were allowed to transfer to other work stations if they found they are unfit for the job. The workers were provided with standard treatment such as free medical treatment, fair overtime offered to all the workers whoever want to work and free housing to everyone.	Complied
6.8.3 It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	Recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. It was noted during the audit that there is no discrimination based on nationality, race, gender, age, etc.	Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.		

Criterion / Indicator		Assessment Findings	Compliance
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	Social Policy dated 22/6/2015 was developed by Genting Plantations Berhad where the company prohibits physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation. Besides, Sexual Harassment Policy dated 3/8/2009 was implemented where the company strive for a harassment-free environment. The policy was briefed to the workers on 19/2/2019 in GSOM and 4/3/2019 in GSPE. Policy was displayed at the notice board outside the office.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	The company has developed Social Policy dated 22/6/2015 to protect the reproductive rights of employees. The policy was briefed to the workers on 19/2/2019 in GSOM and 4/3/2019 in GSPE. Policy was displayed at the notice board outside the office.	Complied
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	Genting Plantations Berhad has developed Procedure on Prevention and Eradication of Sexual Harassment at the Workplace, Doc. No. SMP-GPB-20, Rev. 00 dated 11/10/2013 to explain the types of sexual harassment and procedure to handle if there is any case. The complainant shall have reported within 24 hours from the date of incident happened. If the problem could not be solved within 5 days, then the issue will be forwarded to HRAD for further investigation. All the reported cases will be handled confidentially. The identity of the complainant will not be disclosed and will be protected. Grievance/ Complaint Form for Sexual Harassment was implemented to record any issues related to sexual harassment. There was no case of sexual harassment reported verified through interviewed with female workers. Women's Affair Committee has been established in GSOM and GSPE. Meeting was conducted on half yearly basis in GSPE where the last meeting was conducted on 25/1/2019, 6/9/2018 and 27/3/2018. Issues raised during the meeting were recorded in the minutes.	Complied

Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Genting Sabapalm Oil Mill has received outsider FFB crops from smallholders. The price of FFB for past three months has been displayed at the notice board at weighbridge area. Pricing mechanism for FFB follows the MPOB price structure.	Complied
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	The smallholders have been briefed and signed on the Policy of Purchase of FFB. The pricing formula has clearly stated in the agreement where the prices is adopted from MPOB reference price.	Complied
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	Sampled of the Policy of Purchase of FFB was sighted where the terms and conditions were clearly defined in the policy which has been acknowledged by the smallholders after they have been briefed. They are not contractual bond with the company.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>6.10.4 Agreed payments shall be made in a timely manner. - Minor compliance -</p>	<p>For the FFB suppliers, they will receive final payment in the following month by the 12th day for the FFB supplied in the preceding month based on the month-end price computed and a progress payment recommended by the respective mill manager.</p> <p>For other contractors, the company shall pay to the contractor within 45 days from the date of receipt of the invoice.</p> <p>Sampled of the payment advices for FFB suppliers as below:</p> <ul style="list-style-type: none"> a. Transaction Reference# 514939110100149 dated 13/12/2018 for FFB supplier. b. Transaction Reference# 515216800100204 dated 14/1/2019 for FFB supplier c. Transaction Reference# 515492970100014 dated 13/2/2019 for FFB supplier d. Transaction Reference# 514939110100307 dated 13/12/2018 for FFB supplier <p>Verified from the Marketing Department confirmed that they have delayed in sending the invoice to the Finance Department for payment. Therefore, the payment was made after the agreed timeline which is before 12th of the following month.</p> <p>Hence, a minor non-conformance was raised.</p>	<p>Minor nonconformance</p>
<p>Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.</p>		

Criterion / Indicator	Assessment Findings	Compliance	
6.11.1	<p>Contributions to local development that are based on the results of consultation with local communities shall be demonstrated.</p> <p>- Minor compliance –</p>	<p>The mill management has made contribution to the local communities such as provide job opportunity to local people. Besides, the management has supplied portable water to the villagers upon request. Additional time for electricity supply to the workers whenever there is an event/ function by workers.</p> <p>In GSPE, the management has provided usage of community hall, chairs and sound system for HUMANA school event upon request. Besides, donation to school event and supplied water to the police station. Transportation (Bus and Boat shuttling service) was provided to send the children of workers and smallholders to primary and secondary school. In addition, the estate has budgeted to construct new building for HUMANA school in Y2019.</p>	Complied
6.11.2	<p>Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.</p> <p>- Minor compliance –</p>	<p>Not applicable as there was no schemes smallholder involved in the certification unit. Only independent smallholders and out-growers.</p>	Not applicable
<p>Criterion 6.12: No forms of forced or trafficked labour are used.</p>			

Criterion / Indicator	Assessment Findings	Compliance
<p>6.12.1 There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -</p>	<p>The company has recruited all the employees with legal identification for local and valid passport and work permit for foreign workers and contractors' workers. Contract of employment was signed by the workers prior to work. Sampled of foreign workers with valid work permit as below:</p> <ul style="list-style-type: none"> a. Permit No.: PE 6255469 valid until 21/10/2019 (GSOM) b. Permit No.: PE 6255333 valid until 20/9/2019 (GSOM) c. Permit No.: PE 1860099 valid until 23/8/2019 (GSOM) d. Permit No.: PE 6526936 valid until 20/8/2019 (GSOM) e. Permit No.: PE 6524055 valid until 22/1/2020 (GSPE) f. Permit No.: PE 1863400 valid until 4/8/2019 (GSPE) g. Permit No.: PE 6531749 valid until 18/12/2019 (GSPE) h. Permit No.: PE 1863380 valid until 25/8/2019 (GSPE) i. Permit No.: PE 6520608 valid until 27/12/2019 (GSPE) j. Permit No.: PE 2032989 valid until 4/11/2019 (GSPE's Contractor Worker) k. Permit No.: PE 6726327 valid until 9/1/2020 (GSPE's Contractor Worker) l. Permit No.: PE 1863748 valid until 25/8/2019 (GSPE's Contractor Worker) m. Permit No.: PE 1860532 valid until 29/7/2019 (GSPE's Contractor Worker) <p>Interviewed with the foreign workers confirmed that they have freedom to go out from the compound during off day. They are voluntarily to hand out their passport to keep by the management to avoid any loss of passport. They can get back their passport whenever needed.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance -	Interviewed with the foreign workers confirmed that no contract substitution has occurred.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Genting Plantations Berhad has developed Procedures for Social Management, Doc. No. SMP-GPB-32, Rev. 0 dated 18/1/2018. The procedure has clearly outlined the practices of the company such as no contract of substitution for the foreign workers, provide reasonable and safe living condition to all the employees, post arrival orientation will be provided to brief on terms and conditions, safety & health, national and state laws and regulations and no discrimination to all the workers.	Complied
Criterion 6.13: Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	Genting Plantations Berhad has developed Social Policy dated 22/6/2015 where the company respect and support the Universal Declaration of Human Rights. The policy was briefed to the workers on 19/2/2019 in GSOM and 4/3/2019 in GSPE. Interviewed with the workers confirmed that they were respected by the company. The policy was displayed at the notice board in the office area.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	HUMANA was established in the estates to provide education opportunity to the Indonesian children staying in the compound. The management has submitted fees to HUMANA Child Aid Society Sabah on monthly basis for total 91 students in GSPE and 2 students in GSOM. Interviewed with the HUMANA teachers confirmed that the management has provided assistance whenever they requested such as upkeep and maintenance of building and transportation assistance.	Complied
Principle 7: Responsible development of new plantings			

Criterion / Indicator	Assessment Findings	Compliance
Genting Sabapalm Oil Mill	Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance assessment. The immature areas are replanted area.	
Principle 8: Commitment to continual improvement in key areas of activity		
Criterion 8.1:	Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.	

Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p><u>GSOM</u></p> <p>The mill has established Continuous Improvement Plan. The plan stated the issue, objective, action plan, monitoring/verification, person responsible and status. Issue identified as follows:</p> <ol style="list-style-type: none"> i. Environmental impacts ii. Waste reduction iii. Pollution and greenhouse gas emission iv. Social impacts v. Encourage optimize the yield vi. Workers personal file vii. Water consumption and quality viii. Health and safety performance <p><u>GSPE</u></p> <p>The estate has established Continuous Improvement Plan and review on annually basis. Latest review was conducted on 5/3/2019. The plan stated the issue, objective, action plan, monitoring/verification, person responsible and status. Issue identified as follows:</p> <ol style="list-style-type: none"> i. Minimize use of certain pesticides ii Environmental impacts iii. Waste reduction iv. Pollution and greenhouse gas emission v. Social impacts vi. Mechanism to capture the performance and expenditure in social and environmental aspects vii. Encourage optimize the yield viii. Workers personal file ix. Water consumption and quality x. Health and safety performance 	<p>Complied</p>

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Appendix B: Approved Time Bound Plan

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of 23 July 2018	Any unresolved non-compliances
1	Genting Plantations (WM) Sdn Bhd & Setiamas Sdn Bhd(100%)for estates	Genting Sri Gading Estate,	Supply base for Genting Ayer Item Oil Mill, Johor, Malaysia	Dec,2014	Certified	None
2		Genting Sungei Rayat Estate,				
3		Genting Kulai Besar Estate,				
4		Genting Tanah Merah Estate,				
5		Genting Tebong Estate,				
				Dec,2015		
				July, 2015		
6	Genting Plantations (WM) Sdn Bhd (100%)for estates	Genting Selama Estate, Kedah, Malaysia		July,2015 To be re-certified in July 2019	Voluntary Suspension of the Certificate w.e.f 1 Sept 2017	Land title conversion in progress
7	Genting SDC Sdn Bhd (100%)	Genting Sabapalm Estate, Sabah, Malaysia	Supply base for Genting Sabapalm Oil Mill, Sabah, Malaysia	Aug,2015	Certified	None
8	Genting Tanjung Bahagia Sdn Bhd (100%) for estates	Genting Tanjung Estate, Sabah, Malaysia	Supply base for Genting Tanjung Oil Mill, Sabah, Malaysia	Aug,2016	Certified	None
9		Genting Tenegang Estate, Sabah, Malaysia				
10		Genting Layang Estate, Sabah, Malaysia				
11		Genting Bahagia Estate,				
12	Landworthy Sdn Bhd (84%)	Genting Landworthy Estate, Sabah, Malaysia				
13	Genting Tanjung Bahagia Sdn Bhd (100%) for estates	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah Oil Mill, Sabah, Malaysia	Oct 2018		The Remediation and Compensation Procedures is pending for Genting Kencana Estate. LUCA has been passed. Concept Note (CN) for Remediation and Compensation has been submitted to RSPO.
14		Genting Permai Estate, Sabah, Malaysia				
15		Genting Kencana Estate, Sabah, Malaysia				
16	Genting SDC Sdn Bhd (Genting Jambangan Estate, Sabah, Malaysia	Supply base for Genting Jambangan Oil	Sept 2019		Concept Note and Remediation Plan has been

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of 23 July 2018	Any unresolved non-compliances
	100%) for estate and mill		Mill,Sabah,Malaysia			submitted to RSPO. RSPO allowed for Genting Jambongan to proceed with its certification programme.
17	Genting Plantations Bhd Wawasan Land Progress Sdn Bhd (100%)	Genting Sekong Estate, Sabah, Malaysia	Supply base for Genting Trushidup Oil Mill, Sabah, Malaysia	Sept,2017	Certified	None
18	Asiaticom Sdn Bhd (100%) Sawit Sukau Usahasama Sdn Bhd(56%)	Genting Suan Lamba Estate, Sabah, Malaysia				
19	PT Sepanjang Intisurya Mulia (70%)	Mulia 1 & 2 Mulia 3 & 4 Mulia 5 & 6	Supply base for Mulia Oil Mill, Kalimantan, Indonesia	Oct, 2017	Audited	None
20	PT Sawit Mitra Abadi (70%)	Abadi 1 & 2 Abadi 3 & 4				
21	Genting Plantations Berhad (100%)	Genting Mewah Estate, Sabah, Malaysia	Supply base for Genting Mewah Oil Mill,Sabah, Malaysia	Mar,2017	Certified	None
22	Genting Plantations (WM) Sdn Bhd (100%)	Genting Bukit Sembilan Estate, Kedah, Malaysia		July,2017	Certified	None
23	PT Globalindo Agung Lestari (60%)	Lamunti Barat Estate Lamunti Timur Estate I &II Mangkatip Estate I & II Bakuta Estate Plasma Timur & Barat	Supply base for Globalindo Oil Mill, Kalimantan, Indonesia	Oct,2023		In process of obtaining HGU NPP for PT UAI in progress. In the process of obtaining HGU for UAI.
24	PT United Agro Indonesia(60%)	PT UAI 1 & 2 UAI Plasma		Oct, 2023		

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25	PT Susantri Permai (95%)	Puroh Estate Masaha Estate Zircon Hill Estate	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia	Oct, 2022		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		SP Plasma		Oct, 2023		
26	PT Kapuas Maju Jaya (95%)	Waterfall Estate I & II Muhun Estate I & II Talawang Estate I & II	Supply bases for Golden Hill Oil Mill, Kalimantan Indonesia	Oct,2022		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		KMJ Plasma		Oct, 2023		
27	PT Dwie Warna Karya (95%)	Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate		Oct , 2022		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		DWK Plasma		Oct, 2023		
28	PT Citra Sawit Cemerlang (70%)	CSC Estates	Supply base for CSC Oil Mill*	Oct,2021		In process of obtaining HGU.
29	PT Surya Agro Palma (70%)	SAP Estate 1&2 SAP Estate 3&4 SAP Estate 5&6	Supply base for SAP Oil Mill*	Oct, 2020		In process of obtaining HGU.
30	PT Agro Abadi Cemerlang (70%)	AAC 1 & 2				NPP In Progress. HCV report being reviewed at HCVRN.
		AAC 3 & 4				
31	PT Palma Agro Lestari Jaya (70%)	PALJ Estates	Supply base for PALJ Oil Mill*	Aug,2023		NPP In Progress. HCV report under review by HCVRN.
		PALJ Plasma				
32	Knowledge One Investment Pte Ltd (85%)-PT Kharisma Inti Usaha (KIU)	KIU 1 & 2 KIU 3 & 4	Supply base for KIU Oil Mill	July, 2019		In progress to engage consultants to carry out assessments as per NPP requirements.
		KIU Plasma		July 2022		

Note: The above time-bound plan is subject to revision and changes by top management. If any change is made, the Certification Body will be notified before the next audit.

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**Oil Mill planned for construction*

Estates not to be included into the TBP due to its future plan for property development.

No	Subsidiaries & Ownership (%)	Name of Estate
1	Genting Plantations (WM) Sdn Bhd	Genting Cheng Estate, Melaka Genting Sepang Estate, Selangor

Time bound Plan for Downstream Business (Supply Chain Certification)

No	Subsidiaries & Ownership (%)	Name of Plant	TBP for Certification	Status as of 31 March 2018	Any unresolved non compliances
1	Genting MusimMas Refinery Sdn Bhd (72%)	Genting MusimMas Refinery		Certified	None

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2018 for Genting Sabapalm Oil Mill and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2018 for Genting Sabapalm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	3.49
PKO	3.49

Extraction	%
OER	20.93
KER	4.08

Production	t/yr
FFB Process	89377.62
CPO Produced	23267.085
PKO Produced	4534.275

Land Use	Ha
OP Planted Area	3908.20
OP Planted on peat	1336.39
Conservation (forested)	0.00
Conservation (non-forested)	8.95
Total	

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	35698.19	0.4	0	0	0	0	35698.19	0.4
CO ₂ Emission from fertilizer	2434.37	0.03	0	0	0	0	2434.37	0.03
NO ₂ Emmision	12125.28	0.14	0	0	0	0	12125.28	0.14
Fuel Consumption	1222.09	0.01	0	0	0	0	1222.09	0.01
Peat Oxidation	72967.99	0.82	0	0	0	0	72967.99	0.82
Sink								
Crop Sequestration	-33837.14	-0.38	0	0	0	0	-33837.14	-0.38
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	90610.78	1.01	0	0	2394.39	0	90610.78	1.01

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**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	3412.15	0.03
Fuel Consumption	1005.88	0.01
Grid Electricity Utilisation	0	0
Credit		
Export of Grid Electricity	-350.43	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	4067.61	0.04

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	15832.12
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	15832.12

*This mill has no kernel crusher operation.

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

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

Appendix D: General Chain of Custody Requirements for the Supply Chain

5.1 Applicability of the general chain of custody requirements for the supply chain			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Genting Sabapalm Oil Mill has takes legal ownership and physically handle the RSPO Certified Sustainable oil palm products such as CPO and PK. All trading, contract and sales are managed by Marketing Palm Product Department, HQ and held the PalmTrace registration number for respective mill (Genting Sabapalm Oil Mill: RSPO_PO1000004650).	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Genting Sabapalm Oil Mill is not a trader and distributor. Therefore, no license is required and the requirement is not applicable.	Yes
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	Genting Plantations Berhad held RSPO membership number: 1-0086-06-000-00 since 14 November 2006. Genting Sabapalm Oil Mill has registered in Palm Trace system as follows: Members ID: RSPO_PO1000004650 License valid until 08/06/2019 Member category : Oil Mill	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	Genting Sabapalm Oil Mill is not refinery, therefore no processing aids need to be included.	Yes
5.2 Supply chain model			

5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	Genting Sabapalm Oil Mill is using Mass Balance Supply Chain Module since the FFB suppliers are of RSPO certified estate, Genting Sabapalm Estate and other independent smallholders. Declassification of the CPO or PK was done in accordance to the correct order. During the period of April 2018 – February 2019, Genting Sabapalm Oil Mill has received and processed FFB from own plantations and outside crop: 104,292.41 MT.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Genting Sabapalm Oil Mill is Mass Balance certified and sales of the products were of MB or conventional only.	Yes
5.3. Documented Procedures			
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	Supply Chain and Traceability (Mill) Procedure, Doc. No. SMP-GPB-23 dated 24/8/2018 has been established to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. Besides, procedures that are relevant were developed as below: <ol style="list-style-type: none"> Incoming Inspection (Direct Material), Doc. No. PM-PRD-04 dated 2/1/2018 Product Identification & Traceability, Doc. No. PM-PRD-01 dated 2/1/2018 Handling, Storage, Preservation and Delivery, Doc. No. PM-LAB-03 dated 2/1/2018 Internal Audit, Doc. No. SMP-GPB-03, Rev. 04 dated 25/5/2018 Management Review, Doc. No. SMP-GPB-06, Rev 01 dated 25/5/2018/2018 Production Planning & Scheduling, Doc. No. PM-PRD-03 dated 2/1/2018 	Yes

		The procedure has remained valid and up-to-date as there was no new requirements for supply chain has been introduced. Thus, the Major Non-conformance remained closed.	
	<ul style="list-style-type: none"> Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	<p>Among the records included in the procedures are:</p> <ol style="list-style-type: none"> Weighbridge tickets Dispatch of CPO/PK delivery note Daily Production Report Mass Balance Worksheet Training records <p>All the records were found to be up-to-date.</p> <p>There was a training on the Supply Chain, Traceability and Mass Balance carried out by Mill Senior Assistant Manager on 21/2/2019. Attendance list was sighted where Office Clerk and Weighbridge Operator have participated in the training.</p>	Yes
	<ul style="list-style-type: none"> Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard. 	The Mill Manager to appoint responsible employees to implement and maintain the Supply Chain and Traceability System. Office Clerk has been appointed as the person-in-charge for Supply Chain, Traceability and Mass Balance requirements of RSPO, ISCC and MSPO Sustainability Standards and seen the appointment letter dated 3/1/2019. Interviewed with the PIC confirmed that she was able to demonstrate the implementation of their procedures in accordance to the standard.	Yes
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	Internal Audit, Doc. No. SMP-GPB-03, Rev. 04 dated 25/5/2018 was developed and implemented in the Oil Mill. The frequency of the internal audit is not less than once a year as per the procedure. The requirements of RSPO have been addressed in the procedure. The procedure has remained valid and up-to-	Yes

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		date as there was no new requirements for supply chain has been introduced. Thus, the Major Non-conformance remained closed.	
	ii) effectively implements and maintains the standard requirements within its organization	The last internal audit was carried out on 12-13/2/2019 by Sustainability Manager and Safety Officer. There was 1 non-conformance was raised during the audit through verified the internal audit checklist report. The procedure has remained valid and up-to-date as there was no new requirements for supply chain has been introduced and internal audit that involved for SCCS was carried out accordingly. Thus, the Major Non-conformance remained closed.	Yes
5.4. Purchasing and goods in			
5.4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB can be traced on Mass Balance Worksheet. Records verified by internal and external audit.</p> <p>Genting Sabapalm Oil Mill have LintraMax system to verify at the weighbridge, all crop from supplying estate and non-certified smallholder within Genting Sabapalm Oil Mill. Sampled of ticket for certified supply base as following:</p> <p>1)</p> <ul style="list-style-type: none"> • Name and Address of Buyer: Genting Sabapalm Oil Mill • Name and Address of Seller: Genting Sabapalm Estate • Loading or Shipment/ Delivery Date: 15/2/2019 • Date Issued of Weighbridge Ticket: 15/2/2019 • Description of product: Fresh Fruit Bunches • Quantity of Product: 5,250 kgs • Transport documentation (lorry registration No.): THT-12 	Yes

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		<ul style="list-style-type: none"> • Supply Chain Certificate Number of Seller: RSPO 653477 • Unique Identification Number (Weighbridge Ticket No.): FFb19002234W <p>2)</p> <ul style="list-style-type: none"> • Name and Address of Buyer: Genting Sabapalm Oil Mill • Name and Address of Seller: Genting Sabapalm Estate • Loading or Shipment/ Delivery Date: 17/2/2019 • Date Issued of Weighbridge Ticket: 17/2/2019 • Description of product: Fresh Fruit Bunches • Quantity of Product: 11,970 kgs • Transport documentation (lorry registration No.): HK No. 13 • Supply Chain Certificate Number of Seller: RSPO 653477 • Unique Identification Number (Weighbridge Ticket No.): FFb19002339W <p>All the FFB Despatch Advices were stamp as RSPO certified FFB (include RSPO supply chain certificate no., supply base, validity period)</p>	
	<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	<p>The information was available in various documents such as FFB Despatch Advices and weighbridge tickets.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> • The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and 	<p>The mill has only one certified supplier, Genting Sabapalm Estate. The weighbridge clerk will check during receiving to ensure the FFB received is certified. List of FFB supplier was maintained.</p>	<p>Yes</p>

	Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.		
	<ul style="list-style-type: none"> A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. 	A check of the validity of supply chain certification of supplier is done via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org).	Yes
	<ul style="list-style-type: none"> The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. 	Not applicable – this part is applicable for supply chain actor after refinery.	Yes
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	The management has established the Supply Chain and (Mill) Procedure, SMP-GPB-23, Rev. 07 dated 24/8/2018 where it was mentioned about the handling on non-conforming oil palm products.	Yes
5.5. Outsourcing activities			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	<p>The company has outsourced the transportation for CPO and PK delivery to third parties and own company transporter. Transporter Agreements were sighted as below:</p> <ol style="list-style-type: none"> Landasan Kember Sdn Bhd valid from 1/6/2018 to 31/5/2021 for CPO and PK. Juita Baru Sdn Bhd valid from 1/6/2018 to 31/5/2021 for CPO and PK. <p>Requirement to adhere to RSPO supply chain standard is clearly defined in the agreement and the contractors have acknowledged on the requirements to be complied. There was a briefing of the RSPO SCCS requirements to the PK and CPO transporters on 25/2/2019 and attendance list was sighted.</p>	Yes

5.5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a. The site has legal ownership of all input material to be included in outsourced processes;	Not applicable. No outsourcing activity.	N/A
	b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.	Not applicable. No outsourcing activity.	N/A
	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	Not applicable. No outsourcing activity.	N/A
	d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.	Not applicable. No outsourcing activity.	N/A
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Not applicable. No outsourcing activity.	N/A
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	Not applicable. No outsourcing activity.	N/A
5.6. Sales and goods out			
5.6.1	The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form. <ul style="list-style-type: none"> The name and address of the buyer; 	Genting Sabapalm Oil Mill ensured the required information is available in document form. Sampled contracts as below:	Yes

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	<ul style="list-style-type: none"> • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number 	<p>i) Contract No.: SSD/0618/S01PK dated 31/5/2018, Quantity: 200 MT</p> <ul style="list-style-type: none"> • The name and address of the buyer: XXX • The name and address of the seller: Genting Sabapalm Oil Mill, Jalan Labuk, Sandakan • The loading or shipment/ delivery date: 16/8/2018 • The date on which the documents were issued: 16/8/2018 • Description of the product: PK RSPO MB • The quantity of the products delivered: 23,960 kgs • Any related transport documentation: Delivery/ Goods Received Advice Ticket No.# PKMB18000035W • Supply chain certificate number of the seller: Delivery/ Goods Received Advice with stamping of RSPO Supply Chain Certificate # RSPO 653477 • A unique identification number: Refer to Contract No. SSD/0618/S01PK. <p>ii) Contract No.: SSD/0119/S02PK dated 26/12/2018, Quantity: 400 MT</p> <ul style="list-style-type: none"> • The name and address of the buyer: XXX • The name and address of the seller: Genting Sabapalm Oil Mill, Jalan Labuk, Sandakan • The loading or shipment/ delivery date: 18/1/2019 • The date on which the documents were issued: 18/1/2019 • Description of the product: PK RSPO MB • The quantity of the products delivered: 29,100 kgs • Any related transport documentation: Delivery/ Goods Received Advice Ticket No.# PK19000003W • Supply chain certificate number of the seller: Delivery/ Goods Received Advice with stamping of RSPO Supply Chain Certificate # RSPO 653477 • A unique identification number: Refer to Contract No. 	
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		Available in a few forms such as Delivery/ Goods Received Advice, Authorization Form and GSOM Despatch Checklist.	
	<ul style="list-style-type: none"> Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	Based on samples delivery documents of contracts# SSD/0618/S01PK and SSD/0119/S02PK, all information was complete and can be presented in various documents as mentioned in Indicator 5.6.1 above.	Yes
	<ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. 	All announcement was adequately made in the RSPO PalmTrace. Ever since the last assessment, there were 18 announcements for PK (Total Volume = 1,975.43 MT). Bring forward volume of 143.29 MT from March 2018 that sold in April 2018.	Yes
5.7. Registration of transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> are mills, traders, crushers and refineries and; take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	<p>The registration of PalmTrace will be carried out by the Marketing Palm Product Department, HQ. All transaction will be registered in the PalmTrace. Company has registered in PalmTrace system as follows: Members ID – Genting Sabapalm Oil Mill: RSPO_PO1000004650 Member Category: Oil Mill Genting Plantations Bhd held RSPO membership number: 1-0086-06-000- 00 since 14 November 2006.</p>	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. 	<p>Based on the announcement summary, all the registrations were found to be in order. Total registered transaction (extracted from Palm Trace) summarized as per below: CPO: nil PK: 1,975.43 MT Bring forward volume of 143.29 MT from March 2018 that sold in April 2018. Detailed transaction can be found under table C of the report.</p>	Yes

	<ul style="list-style-type: none"> Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. 	Not applicable. Products are not sold beyond refinery.	N/A
	<ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 	There was volume sold for other scheme and conventional (refer to Table 11 & 12 - Supply Chain declaration of Table D & E; Summary Template).	
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	Sampled of shipping announcement documents and found that the management done the shipping announcement accordingly.	
5.8. Training			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Genting Sabapalm Oil Mill has developed Training Plan 2019 which has planned for the training of Supply Chain, Traceability and Mass Balance.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	There was a training on the Supply Chain, Traceability and Mass Balance carried out by Mill Senior Assistant Manager on 21/2/2019. Attendance list was sighted where Office Clerk and Weighbridge Operator have participated in the training. Besides, there was a briefing of the RSPO SCCS requirements to the PK and CPO transporters on 25/2/2019 and attendance list was sighted.	Yes
5.9. Record Keeping			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	Genting Sabapalm Oil Mill has established Control of Records Procedure, Doc. No. SMP-GPB-02, Rev. 00 dated 1/8/2013 where they maintained the accurate, complete, up-to-date and	Yes

		<p>accessible records and reports covering all aspects of these Sustainability Management System as below:</p> <ul style="list-style-type: none"> a. Internal audit reports b. Management review c. Weighbridge ticket d. Sales Contract <p>Mass Balance - Excel</p>	
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	<p>Seen the List of Operation, Environment, Social, Safety and Health Records confirmed that the retention period of all the records is minimum 5 years. For eg:</p> <ul style="list-style-type: none"> a. Internal audit reports b. Management review c. Weighbridge ticket d. Sales Contract e. Mass Balance – Excel 	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	<p>Forecast volume for June 2019 – May 2020:</p> <p>CSP0: 20,706 MT</p> <p>CSPK: 4,141 MT</p>	
5.10. Conversion factors			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Last year’s average form April 2018 to February 2019 were 20.98% (OER) & 4.09% (KER).</p>	

5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	
5.11. Claims			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	The company does not make any claims regarding the use of or support of RSPO certified oil palm products through verified the company website, purchase order, contract, delivery order and any other company communication method.	Yes
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Genting Sabapalm Oil Mill does not use any RSPO trademark or logo in any general corporate communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.	Yes
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.	Genting Sabapalm Oil Mill does not use any RSPO trademark or logo in any general corporate communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.	Yes
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	The company does not make any statement that may misleading to the consumers to believe that RSPO membership by itself implies that selling of RSPO-certified oil palm products by verified through the website.	Yes

4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	The communication that made via website is consistent, clear and does not mislead the consumer and stakeholders as to the certified content of oil palm products in their own products.	Yes
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	There was no RSPO corporate logo has been used verified through website, notice board, business card, shipping documentation and procurement/ purchasing document.	Yes
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. No claims have been made.	Yes
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that the product is CSPO with RSPO certificate number: RSPO 653477.	Yes
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: <ul style="list-style-type: none"> a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. 	Genting Sabapalm Oil Mill is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Yes

5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>Genting Sabapalm Oil Mill is producing crude palm product and does not involved in any labelling of end product and the presence of certified palm oil contained within a product. This requirement is for the next supply chain actor and not applicable for POM.</p>	Yes
Business to consumer communication			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.</p>	<p>No business to consumer communication on product specific claim made by Genting Sabapalm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.</p>	Yes
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	<p>No business to consumer communication on product specific claim made by Genting Sabapalm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.</p>	Yes
6.3	<p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p>	<p>No business to consumer communication on product specific claim made by Genting Sabapalm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.</p>	Yes
6.4	<p>Business to consumer communication shall not include information about the claimant's RSPO membership status.</p>	<p>No business to consumer communication on product specific claim made by Genting Sabapalm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.</p>	Yes
6.5	<p>Members shall not communicate to consumers information about their suppliers' RSPO membership status.</p>	<p>No business to consumer communication on product specific claim made by Genting Sabapalm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.</p>	Yes

6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made by Genting Sabapalm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Yes
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made by Genting Sabapalm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Yes
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org .	No business to consumer communication on product specific claim made by Genting Sabapalm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Yes
MODULE B – MASS BALANCE SPECIFIC RULES			
	95% or above of the oil palm content must be RSPO MB-certified.	Genting Sabapalm Oil Mill is producing crude palm product and does not involved in any labelling of end product.	
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the	Genting Sabapalm Oil Mill is producing crude palm product and does not involved in any labelling of end product.	

	<p>requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>		
<p>Labelling and trademark (MB)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). <p>In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document.</p>	<p>Genting Sabapalm Oil Mill is producing crude palm product and does not involved in any labelling of end product.</p>	
<p>Messaging (MB)</p>			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. 	<p>Genting Sabapalm Oil Mill is producing crude palm product and does not involved in any labelling of end product.</p>	

	<ul style="list-style-type: none"> The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p>		
	<p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <p>Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</p>	<p>Genting Sabapalm Oil Mill is producing crude palm product and does not involved in any labelling of end product.</p>	
<p>MODULE C – PARTIAL PRODUCT CLAIMS</p>			
	<p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p> <ul style="list-style-type: none"> The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO. At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB. The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume. The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'. <p>The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim.</p>	<p>Genting Sabapalm Oil Mill is producing crude palm product and does not involved in any labelling of end product.</p>	
<p>MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES</p>			

	<p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p> <p>75% IP + 20% SG => 95% SG claim is made 65% SG + 30% MB => 95% MB claim is made 55% MB + 40% B&C => 95% partial product claim can be made 45% SG + 55% B&C < 50% B&C claim can be made</p>	<p>Genting Sabapalm Oil Mill is producing crude palm product and does not involved in any labelling of end product.</p>	
	<p>Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made:</p> <p>95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made</p>	<p>Genting Sabapalm Oil Mill is producing crude palm product and does not involved in any labelling of end product.</p>	
5.12. Complaints			
5.12.1	<p>The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.</p>	<p>The company has established Handling of Customer Feedback/ Complaints procedure, Doc. No. PM-MKT-05 dated 2/1/2018 where the procedure has defined the actions and responsibilities of the management to handle customer complaints to ensure no recurrence of the same defect. Besides, Corrective Action procedure, Doc. No. PM-MGR-02 dated 2/1/2018 to define the implementation of corrective action arising from customer complaints or complaints/ reports and QESHS non-conformities from within the organizations.</p>	Yes
5.13. Management Review			
5.13.1	<p>The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.</p>	<p>The company has established Management Review procedure, Doc. No. SMP-GPB-06, Rev. 01 dated 25/5/2018 and objective is to ensure the Sustainability Management System and performance continue to meet the RSPO, ISCC, MSPO or other sustainability requirements and needs of the Company. The</p>	Yes

		frequency of the management review was set at least once a year. The procedure has remained valid and up-to-date as there was no new requirements for supply chain has been introduced. Thus, the Major Non-conformance remained closed. The last management review meeting was conducted on 7/3/2019.	
5.13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	<p>The last management review meeting was conducted on 7/3/2019 and meeting minutes was sighted. All the inputs were covered during the meeting as verified through the meeting minutes. Agenda that has discussed such as:</p> <ol style="list-style-type: none"> Results of Internal RSPO SCCS Audit – Conducted on 12-13/2/2019 and there was 1 non-conformance raised. Customer feedback – As per 2018 there is no complaints from the mill customer – GMMR and Sandakan Edible Oil (SEO). <p>The procedure has remained valid and up-to-date as there was no new requirements for supply chain has been introduced. Thus, the Major Non-conformance remained closed.</p>	Yes
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	<p>The output from management review including decisions and actions were clearly recorded in the minute of meeting dated 7/3/2019 pertaining to the improvement and resource needs. The procedure has remained valid and up-to-date as there was no new requirements for supply chain has been introduced. Thus, the Major Non-conformance remained closed.</p>	Yes

Appendix E: CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: Mass Balance)

E.1 Definition			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
E.1.1	Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Genting Sabapalm Oil Mill receives and process both certified and noncertified FFB (Own estate -75% and outsider (25%)). Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO Certified Products.	Yes
E.2 Explanation			
E.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. Refer to table 8.	Yes
E.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim). Detail of transaction can be found under table C.	Yes

E.3 Documented procedures			
E.3.1	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a. Complete and up to date procedures covering the implementation of all the elements in these requirements;</p>	<p>Supply Chain and Traceability (Mill) Procedure, Doc. No. SMP-GPB-23 dated 24/8/2018 has been established to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. Besides, procedures that are relevant were developed as below:</p> <ul style="list-style-type: none"> a. Incoming Inspection (Direct Material), Doc. No. PM-PRD-04 dated 2/1/2018 b. Product Identification & Traceability, Doc. No. PM-PRD-01 dated 2/1/2018 c. Handling, Storage, Preservation and Delivery, Doc. No. PM-LAB-03 dated 2/1/2018 d. Internal Audit, Doc. No. SMP-GPB-03, Rev. 04 dated 25/5/2018 e. Management Review, Doc. No. SMP-GPB-06, Rev 01 dated 25/5/2018/2018 f. Production Planning & Scheduling, Doc. No. PM-PRD-03 dated 2/1/2018 	Yes
	<p>b. The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</p>	<p>The Mill Manager to appoint responsible employees to implement and maintain the Supply Chain and Traceability System. Office Clerk has been appointed as the person-in-charge for Supply Chain, Traceability and Mass Balance requirements of RSPO, ISCC and MSPO Sustainability Standards and seen the appointment letter dated 3/1/2019. Interviewed with the PIC confirmed that she was able to demonstrate the implementation of their procedures in accordance to the standard.</p>	Yes

E.3.2	The site shall have documented procedures for receiving and processing certifies and non-certified FFBs.	Supply Chain and Traceability (Mill) Procedure, Doc. No. SMP-GPB-23 dated 24/8/2018 has been established to ensure the handling of incoming FFB and outgoing certified and uncertified CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. System available to make marking on the receiving documents to differentiate the certified and noncertified FFB received. Interviewed the weighbridge officer and confirmed that the FFB from own estates will have the stamp on the FFB Despatch Advice.	Yes
E.4 Purchasing and goods in			
E.4.1	The site shall verify and document the volumes of certified and non-certified FFBs received.	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and noncertified FFB. Records verified by external audit. Sighted the Mass Balance worksheet-monthly input from April 2018 – February 2019. The accompanying documents of incoming FFB from own estate are estate’s FFB Despatch Advice which has the info about name of estate, RSPO certificate number, weighbridge ticket number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its Delivery/ Goods Received Advice as confirmation of receipt. For non-certified third party crop, the mill issues Delivery/ Goods Received Advice as confirmation of receipt.	Yes
E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The facilities aware of this procedure. There was no projected overproduction for the period under review.	Yes

E.5 Record keeping			
E.5.1	a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis by RSPO.	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and noncertified FFB. Computerized system (LintraMax) in place. Records verified by internal and external audit.	Yes
	b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated	Computerized system, LintraMax in place with the delivery deducted accordingly.	Yes
	c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.) For further details refer to Module C.	The Mill aware that only positive stock can be delivered. No short selling of product for the period April 2018 - February 2019.	Yes

Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	April 2018	4,770.09	1,493.74	6,263.83
2	May 2018	5,532.55	1,601.18	7,133.73
3	June 2018	4,643.05	1,457.61	6,100.66
4	July 2018	5,563.09	1,800.22	7,363.31
5	August 2018	7,353.06	1,898.31	9,251.37
6	September 2018	9,882.42	2,186.58	12,069.00
7	October 2018	10,332.34	2,476.48	12,808.82
8	November 2018	10,898.71	2,547.31	13,446.02
9	December 2018	10,088.56	1,818.77	11,907.33
10	January 2019	8,033.63	1,596.89	9,630.52
11	February 2019	6,511.88	1,805.94	8,317.82
	Total	83,609.38	20,683.03	104,292.41

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	April 2018	991.23	199.60
2	May 2018	1,219.35	223.30
3	June 2018	992.11	186.79
4	July 2018	1,185.48	216.11
5	August 2018	1,582.54	281.34
6	September 2018	2,094.46	379.89
7	October 2018	2,206.23	415.81
8	November 2018	2,301.83	449.77
9	December 2018	2,056.68	434.83
10	January 2019	1,574.44	354.24
11	February 2019	1,339.59	277.01
	Total	17,543.94	3,418.70

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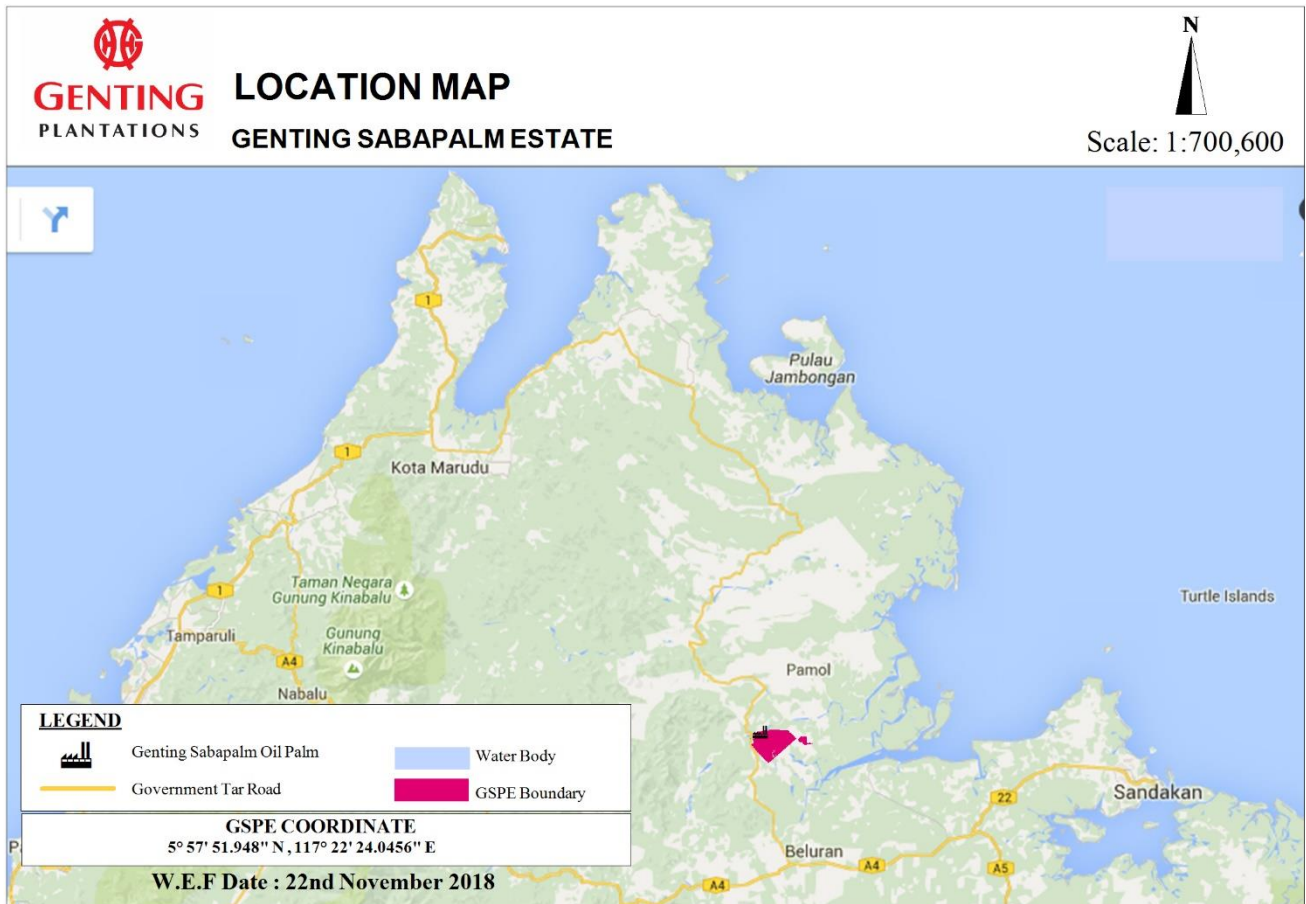
C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1.	A	XXXX	-	1,832.137
Total				1,832.137

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1.	B	ISCC	16,200.96	
Total			16,200.96	

E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1.	C	1,249.12		
2.	D		1,441.335	
Total		1,249.12	1,441.335	

F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)	
N/A				

Appendix F: Location Map of Genting Sabapalm Oil Mill Certification Unit and Supply bases



Appendix H: List of Smallholder Sampled *(If applicable – scheme/associated/group certification)*

Appendix I: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
GSOM	Genting Sabapalm Oil Mill
GSPE	Genting Sabapalm Estate
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure