PF441 RSPO Public Summary Report Revision 8 (Mar / 2019)

RSPO PRINCIPLE AND CRITERIA – INITIAL ASSESSMENT Public Summary Report

Genting Plantations Berhad

Client company Address: 10th Floor, Wisma Genting Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia Certification Unit:

Genting SDC Sdn Bhd Genting Jambongan Palm Oil Mill

Location of Certification Unit: Jambongan Island 90100 Beluran District, 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 14/11/2006 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 SDC Sdn Bhd Genting Jambongan Palm Oil Mill					
Address	Jambongan Island 90100 Beluran District, Sabah, Malaysia					
Contact Name	Mr Tan Cheng Huat					
Website	http://www.gentingplantations E-mail Chenghuat.tan@gentin .com g.com					
Telephone	+603 2333 6510 (Head office) +089 257 112 (GJOM)	+603 2333 6510 (Head office) Facsimile +603 2333 6575				

2. Certification Information						
Certificate Number	RSPO 709622	Date of First Certification	26/08/2019			
		Certificate Start Date	26/08/2019			
		Certificate Expiry Date	25/08/2024			
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- 60184826	ISCC	ASG Cert	05/12/2019				



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4. Location(s) of Mill & Supply Bases								
Name Location [Man Deference #1			GPS Coordinates					
(Mill / S	upply Base)	Location [Map Reference #]	Latitude	Longitude				
Genting Jam	bongan Oil Mill	Jambongan Island 90100 Beluran District, Sabah, Malaysia	6° 39' 06.6" N	117° 26' 46.5" E				
Genting Estate	Jambongan	Jambongan Island 90100 Beluran District, Sabah, Malaysia	6° 38′ 59.3″ N	117° 27′ 3.3″ E				

5. Description of Supply Base							
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted		
Genting Jambongan Estate	3,893.27	24.36	144.67	4,062.30	95.84		

6. Plantings & Cycle							
Fatata		Age (Years)			Matura	T	
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30 Mature		Immature
Genting Jambongan Estate	439.89	71.76	3,381.62	0	0	3,453.38	439.89

7. Certified Tonnage of FFB (Own Certified Scope)						
	Tonnage / year					
Estate	Estimated Actual Forecast (Aug19 – July 20					
Genting Jambongan	N/A	N/A	70,591.00			

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *							
Estate	Estimated	Actual	Forecast (Aug19 - July 20)				
N/A N/A		N/A	N/A				
Total							



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9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable							
	Tonnage / year						
Independent FFB Supplier	Estimated	Actual	Forecast (Aug19 - July 20)				
N/A	N/A	N/A	N/A				

10. Certified Tonnage						
	Estimated	Actual	Forecast (Aug19 – July 20)			
Mill Capacity: 20 MT/hr SCC Model: MB	FFB	FFB	FFB			
			70,591.00 mt			
	CPO (OER:%)	CPO (OER: %)	CPO (OER: 23.00 %)			
			16,235.93 mt			
	PK (KER%)	PK (KER: %)	PK (KER: 4.20 %)			
			2,964.82 mt			

11. Actual Sold Volume (CPO)						
	RSPO Certified	Other Schemes Certified		Conventional	Total	
	KSPO Certified	ISCC	RSB	conventional	Total	
CPO (MT)	N/A	N/A	N/A	N/A	N/A	

12. Actual Sold Volume (PK)						
	RSPO Certified	Other Schemes	Certified	Conventional	Total	
	KSFO Cel tilled	ISCC	RSB	Conventional	Total	
PK (MT)	N/A	N/A	N/A	N/A	N/A	

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd, (ASI Accreditation Number: ASI-ACC-067) Suite 29.01, level 29 The Gradens North Tower Mid Valley City, Lingkaran Syed Putra 59200 Kuala Lumpur Tel +603 9212 9638 Fax +603 9212 9639 Nicholas Cheong: <u>Nicholas.Cheong@bsigroup.com</u> 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 initial assessment was conducted from 13-16/05/2019. 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 Major NC close out on-site assessment was conducted on 10/07/2019. The audit programmes are included in Section 2.3.

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 comments made by external stakeholders were also taken into account in the assessment. The comments made by external stakeholders were also taken into account in the stakeholder notification was made on 03/04/2019 through BSI & RSPO website.

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.



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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.

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 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)		
Genting Jambongan Oil Mill	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark		
Genting Jambongan Estate	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark		

Tentative Date of Next Visit: May 4, 2020 - May 7, 2020

Total No. of Mandays: 10 mandays including 1.0 manday for Supply Chain

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2.2 BSI Assessment Team:

Team Member Name	Role (Team Leader or Team member)	Qualifications (Short description of the team members)
Mohd Hafiz Mat Hussain	Team leader	He holds Bachelor Degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2014 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since May 2013 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, supply chain, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation.
Mohamed Hidhir Zainal Abidin	Team member	He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous work with another certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in various plantation companies in Malaysia. During this assessment, he assessed on the aspects of legal, supply chain, mill best practices, safety and health, environmental and workers and stakeholders consultation.
Elzy Ovktafia Chairul	Team member	She graduated from Universiti Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters and currently in the midst of completing the AISP level (professional certificate and recognition from the Incorporated Society of Planters). She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Audit for Social Compliance Programme (URSA, ETI) for 2 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for almost 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During this assessment, she assessed on the aspects of legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English.



Accompanying Persons:

No.	Name	Role

2.3 Assessment Plan

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

Date	Time	Subjects	мнм	MHZ	EO
Monday, 13/5/19 Genting Jambongan	13:00-13:30	 Opening Meeting at GJOM: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). Verification on previous audit findings 	\checkmark	\checkmark	\checkmark
Oil Mill	13:30–16:30	RSPO Supply Chain for Jambongan POM General Chain of custody: Element 5.1 – 5.13	\checkmark	\checkmark	
		RSPO Supply Chain for Jambongan POM CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: <i>Mass Balance</i>	V	V	
	16:30-17:00	Interim Closing Briefing	\checkmark	\checkmark	
Tuesday, 14/5/19 Genting Jambongan	08:30–12:00	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.	V	V	V
Oil Mill	12:00-13:00	BREAK			
	13:00–16:30	Jambongan Oil Mill : Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation.	\checkmark	\checkmark	\checkmark
	16:30-17:00	Interim Closing Briefing	\checkmark	\checkmark	\checkmark
Wednesday, 15/5/19	08:30-12:00	Jambongan Oil Mill Continue with unfinished elements	\checkmark	\checkmark	\checkmark
Jambongan	09:00-12:00	Meeting with stakeholders (Government, village rep,smallholders, Union Leader, contractor etc.)	-	-	\checkmark
Oil Mill &	12:00-13:00	LUNCH			
Jambongan Estate	13:00–16:00	Jambongan 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).	V	\checkmark	V
	16:00-17:.00	Interim Closing Briefing	\checkmark	\checkmark	\checkmark

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Date	Time	Subjects	мнм	MHZ	EO
Thursday, 16/5/19	08:30-12:00	Jambongan Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP,	V	\checkmark	V
Jambongan Estate		workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.			
	12:00-13:00	LUNCH			
	13:00–16:00	Jambongan 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).	\checkmark	\checkmark	\checkmark
	16:00-16:30	Verify any outstanding issues & Preparation for closing meeting	\checkmark	\checkmark	\checkmark
	16:30-17:30	Closing meeting	\checkmark	\checkmark	\checkmark

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

oxtimes Genting Plantations Berhad Multiple Management Units / Time Bound Plan

- □ RSPO P&C 2013 Generic
- $\hfill\square$ 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		
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? • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law.	Based on age of plantations, location, existing POM facilities and infrastructure as well as status of compliance with applicable law, the time bound found to be challenging.	Yes		
Have there been any changes since the last audit? Are they justified?	On 12 October 2017, the RSPO Secretariat released a statement on Hak Guna Usaha (HGU) to Indonesian stakeholders (<u>https://rspo.org/news- and-events/announcements/revised-rspo-updated- statement-on-hak-guna-usaha-july-2018</u>), 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. 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	Yes		

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	HGU) and IUP in order to secure the RSPO certificates.	
	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.	
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?	No comments received.	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?	Not applicable	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	5	
 No replacement after dates defined in NIs Criterion7.3: Primaryforest. Any area required to maintain or enhance HCVs in accordance with 	Sabah 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.	Yes
RSPO P&C criterion 7.3.	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.	
	Indonesia	
	1. PT SISM – LUCA passed. Concept Note and Remediation Plan submitted and approved by Panel.	
	Remediation Plan submitted and approved by	
	Remediation Plan submitted and approved by Panel. Action plan to be checked by auditor during the	
Any new plantings since January 1 st 2010 shallcomply with the RSPO New Plantings Procedure. Any Land conflicts are being	Remediation Plan submitted and approved by Panel. Action plan to be checked by auditor during the next audit.	Yes



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agreed process, such as RSPO	http://www.rspo.org/members/complaints/status-	
Complaints System or Dispute	of-complaints/view/38	
Settlement Facility, in		
accordance with RSPO P&C	Complaints officially closed on 31 October 2016.	
criteria 2.2, 6.4,7.5 and7.6.		
Any Labor disputes are being	No any labor disputes occur.	Yes
resolved through a mutually		
agreed process, in accordance		
with RSPO P&C criterion6.3.		
Any Legal non- compliance is	Based on the following:	Yes
being addressed through	https://acl/rapa fares com/Complaint/s/casatracker	
measures consistent with the	https://askrspo.force.com/Complaint/s/casetracker	
requirements of RSPO P&C	No any legal non-compliance occur.	
criteria 2.1		
Did the company conduct an	Internal audit was conducted for uncertified units	Yes
internal audit? If so, has a	on periodical basis by Sustainability Team. Internal	
positive assurance statement	audit report indicated the positive assurance has	
been produced?	been produced.	

3.3 Progress of scheme smallholders and/or outgrowers

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
OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.		

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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 Initial Certification Assessment there were 2 (two) Major Nonconformities & 1 (one) Minor Nonconformity raised. The Genting Jambongan 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 it effectiveness and closed accordingly.

Summary of Total Number of Nonconformity				
Nonconformity	-			
NCR Ref #	1776587-201904-M1	Clause & Category (Major / Minor)	Indicator 2.1.1 Major	
Date Issued	16/05/2019	Due Date	13/08/2020	
Closed (Yes / No)	Yes	Date of nonconformity Closure	10/07/2019	
Statement of Nonconformity:	Some of the legal requireme	ents were not effectively dem	ionstrated.	
Requirement Reference:	Evidence of compliance with	n relevant legal requirements	shall be available.	
Objective Evidence:	 There was no linesite inspection carried out after 27/3/2019 for GJOM. At GJBE, the line site inspection has been conducted on weekly basis however the report was not reflected as per actual situation during the site visit. At GJBE, there was no approval from the Labour Department on salary deduction for replacement of damage tools. Sampled as follow: Employee ID: E01690 - Feb 19, Mar 19 and Apr 19 pay slip. Employee ID: E01615 - Feb 19 and Apr 19 pay slip At GJOM, there was no approval from the Labour Department on overtime limit more than 104 hours/month. Verified the overtime record in punch card for Mohxxxx.Suxxxx for Nov 18 and Dec 18. 			
Corrections:	 HA will produce a new weekly line site inspection schedule that will cover all estate and mill labour quarters in weekly basis and the new appointed HA assistant will be trained to conduct this inspection. HA will conduct the line site inspection specifically as per the Line Site Inspection form produced. If happen to be a same situation occur, HA will need to come back to the particular line-site on next working day and completing the inspection before produce the complete inspection report. GJBE will stop do any unpermitted salary deduction. GJOM to ensure overtime do not exceed allowable 104 hours by monitoring on weekly basis. 			
Root Cause Analysis:	1. Due to the distance between line site and the HA didn't have a trained assistant to help conduct the inspection, the line site inspection conducted by HA did not cover all labour quarters in weekly basis and the current practice is one division line site per week.			

	 The HA conducted the line-site inspection and produce the report, however due to an emergency call from the office in that particular day, HA have to rush back to his clinic without completing the overall inspection. Application on salary deduction for replacement of damage tools not approved by the Labour Department for the current permit, however GJBE still continue to do the deduction due to no any instruction issued by top management to stop any unpermitted salary deduction. Application for extension of overtime limit not approved by Labour Department and due to the mill genset problem occurred during the affected month, the worker which is an engine driver, need to stand by for any problem to the mill genset during the mill process.
	1. HA together with his assistant will conduct the weekly line site inspection based on schedule produced. With this method, all line site will be inspected every week without miss. All the inspection report will be reviewed by Estate and Mill Manager.
Corrective Actions:	2. The line site inspection SOP will be reviewed to indicate specifically that any incomplete inspection on the current day must be continue at next day working. Reviewed SOP will be brief to HA.
	3. Notification to stop all un-permitted deduction will be issued by GM and HR.
	4. GJOM will come with weekly monitoring of OT and GJOM will resubmit the application for OT extension permit to JTK.
Assessment Conclusion:	 During the NCR closure visit conducted on 10 July 2019 at Genting Jambongan Estate, it was found that the correction and corrective action has been implemented effectively to close the Major NC. Evidence reviewed/verified: New weekly line site inspection schedule by HA dated 01.07.2019 and approved by Estate Manager and Mill Manager. New reviewed line site inspection SOP (Garis Panduan Pemeriksaan Perumahan) and briefing record to HA. Training for linesite inspection SOP on 24.5.2019 by sustainability executive to HA and newly appointed HA assistant (Razif Shahril Ali). Notification email or letter from GM and HR to discontinue the replacing tools from worker's wages on 28.05.2019 to all Genting Operating Units. Reference been made to the Rejection of the Salary Deduction for Replacing tools (Ref No: JTK.H.IP.600-1/2/13/9 Jld 6 dated 27.05.2019. Pay slip for month June 2019 for Employee ID: E01615 (RM 31.18) was paid accordingly. This is confirmed during the interview session with the worker. Employee ID: E01690 was on leave from 04.05.2019 – 06.05.2019 based on leave certificate number 3326 on 29.04.2019 and absence works. After that he promised to return to work but absence. Police report has been made to the Police Officer in Jambongan Island on his abscond therefore the reimbursement for him can't be paid. Weekly monitoring of OT form format by mill from May to July 2019. Permit Sekatan Kerja Lebih Masa Seksyen 104(7). Ordinan Buruh (Sabah Bab 67) No Siri: 6001/2/13/9(08/SDK/2018-0172) dated 18.05.2018 – valid from 18.05.2018 – 17.05.2020

	Thus, the Major NC was closed effectively.				
Summary of Total Numb	er of Nonconformity				
Nonconformity	Clause & Category Indicator 6.5.2				
NCR Ref #	1776587-201904-M2	Clause & Category (Major / Minor)	Major		
Date Issued	16/05/2019	Due Date	13/08/2020		
Closed (Yes / No)	Yes	Date of nonconformity Closure	10/07/2019		
Statement of Nonconformity:	The inconsistency of worked made are not effectively determined by the second s	er's employment contract us monstrated.	ed and salary deduction		
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:	 There were 2 different version of employment contract sighted at GJOM (version 01.08.2016) and GJBE (version 01.12.2017). The calculation for 'EPF' and 'EPF Tambahan' deduction on VLP in April 2019 were inconsistent. Sampled below: GJBE (Worker ID: E01679), VLP: RM 141.52, EPF Tambahan: RM 15.00. GJOM (Worker ID: E00048), VLP: RM 424.56, EPF Tambahan: RM 46.00. GJOM (Worker ID: E00034), VLP: RM 448.46, EPF Tambahan: RM 51.00. The piece rate workers (GJBE - Worker ID: E01295 and Worker ID: E01459) did not aware on the annual leave entitlement as per their employment contract. In 2018, all their leaves taken are treated as absent although they were entitled for it. 				
Corrections:	 GJOM will update all workers contract to the latest version. Training on the EPF calculation will be provided to the office clerk. Current calculation is correct. GJBE will do a refresh briefing to all workers regarding their signed worker agreement so that workers will always remember and know their privilege as stated in the agreement including the entitlement of paid annual leave. 				
Root Cause Analysis:	 Due to miscommunication between GJOM and HR regarding the latest worker contract agreement, GJOM did not update all the workers contract to the latest version which is version 01.12.2017. The calculation is correct as per the Jadual Ketiga, Kadar Caruman Bulanan by KWSP. However, the office clerk failed to explain clearly to auditors during the audit. GJBE did not do or scheduled any refresh briefing regarding the worker's agreement to all workers. Both of sampled workers did not apply for any annual leave in 2018, based on the Genting Plantations Perjanjian Pekerjaan Clause No. quoted "Masa pengambilan cuti tahunan ini adalah melalui permohonan dan kelulusan oleh pihak majikan". The workers are entitled for annual leave but they have taken their leave without any leave application and approval by the estate management, hence all their leaves taken are treated as absent. 				

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	1. Renewal of worker's employment contract will be implemented to all workers regardless of their contract expiry (3 years).
Corrective Actions:	2. Briefing by the CC to all check roll clerk on the method of EPF calculation based on Jadual Ketiga, Kadar Caruman Bulanan KWSP, will be scheduled every 6 months. All briefing will be documented. This briefing also will be done to new appointed check roll clerk (if any).
	3. GJBE will include this briefing in Annual Training Plan and this briefing will be done twice a year, every 6 months and recorded.;
	During the NCR closure visit conducted on 10 July 2019 at Genting Jambongan Estate, it was found that the correction and corrective action has been implemented effectively to close the Major NC.
Assessment Conclusion:	Evidence reviewed/verified: 1. Two example of updated worker's agreement. (Siti Hawa Balqis & Mohd Sabri bin Shamsul) using the employment contract version 01.12.2017. 2. Training record to clerk on calculation of EPF. Briefing on EPF Contribution Calculation on 19.06.2019 to 7 attendees whom are involve in checkroll calculation. Reference is made to Jadual Ketiga (Subseksyen 43(I) Kadar Caruman Bulanan Bahagian A effective date: 01.08.2013). Viewed pay slip (ID: E01679) month of April 2019 for GJBE and (ID: E00034) for April 2019 GJOM. 3. Annual Training Plan that included this briefing will be done twice a year. The training was planned on 20/6/2019 and 15/12/2019. Sighted the briefing to all workers regarding workers contract agreement on Muster Ground Div. 1,2,3,4 on 20.06.2019.
	Thus, the Major NC was closed effectively.

Summary of Total Numb	Summary of Total Number of Nonconformity				
Nonconformity	Nonconformity				
NCR Ref #	1776587-201904-N1	Clause & Category	Indicator 2.1.3		
NCK KEI #	1770307-201904-111	(Major / Minor)	Minor		
Date Issued	16/05/2019 Due Date Next annual surveillance assessment		surveillance		
Closed	No	Date of nonconformity	"Open"		
(Yes / No)	NO	Closure			
Statement of Nonconformity:	The mechanism for ensuring compliance was not effectively implemented				
Requirement Reference:	A mechanism for ensuring compliance shall be implemented				
Objective Evidence:	 The assessment done by the management for ensuring compliance was not capture the non-compliance as follow: 1. No Boilerman 1st Grade at GJOM as commented by DOSH Officer (visit on 5/3/2019) and required by regulation. 2. No visiting engineer at Genting Jambongan Oil Mill 				

	3. The current competency for electrical chargeman (Grade: AO) was not	
	accordance with the act.	
	 Contravene of license (CL), refer to compliance schedule, LP/PUB2014/S/12/013777 validity period (13/9/18-30/6/18). For the new license period (01/07/2018-30/06/19), no evidence to show that CL has been obtained to contravene clause 16 of Jambongan Oil Mill's compliance schedule (004843) 	
	1. Current boilerman will be sent for any 1st grade Boilerman test held after 18 October 2019.	
	2. Obtain more contact of VEE available and negotiate to visit Jambongan Mill.	
Corrections:	3. The current chargeman will be registered for the competency course in this year. Alternatively, to advertise on the position through banner and/or online channel.	
	4. Apply for the CL for this year starting June 2019.	
Root Cause Analysis:	 Boilerman (Mohammad Subala) had obtained 2nd grade on 18 April 2018. To take the 1st grade test, he needs to go through retention period of 18 months before he can sit for the test. The retention period will end on 18 October 2019. GJOM Location and security concern by VEE caused them to not willing to visit Jambongan Oil Mill. Current chargeman not able to find available part time course for A4 competency through Institut Latihan Perindustrian (ILP) and difficult to find Grade A4 chargeman. 4. No monitoring by GJOM personnel regarding the expired CL hence no application for renewal is issued for the new CL. To ensure the boilerman complete the 1st Boilerman Grade test and get the 	
	competency.2. Provide good accommodation and arrange for security escort once able to confirm visit by VEE.	
Corrective Actions:	3. To ensure the chargeman complete the full competency course until obtain competency for A4.	
	4. To ensure GJOM get the new CL and as DOE has approved off the construction, company will proceed for the contruction of the ESP.	
Assessment Conclusion:	The CAP was accepted. The effective implementation will be verified during next assessment.	

	Opportunity for Improvements	
OFI #	Description	
OFI 1	-Nil-	

Positive Findings		
PF #	PF # Description	
PF 1 Good commitment from the management		

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3.4.1 Status of Nonconformities Previously Identified and Observations

Not applicable as this is initial assessment.

Opportunity for Improvement	
OFI#	Description
OFI 1	-Nil-

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1776587-201904-M1	Major	2.1.1	16/05/2019	Closed out on 10/07/2019
1776587-201904-M2	Major	6.5.2	16/05/2019	Closed out on 10/07/2019
1776587-201904-N1	Minor	2.1.3	16/05/2019	"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 Jambongan Palm 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.

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	Union/Contractors/Local Communities
Mill Operators Harvesters Sprayers Genting Auxiliary Police	Ketua Anak Negeri – Kampung Jambongan
Government Departments	NGO
Royal Malaysian Army –Sri Jambongan Base Camp Klinik Kesihatan Jambongan SK Jambongan	Stakeholder consultation invitation was email to NGO on 09/05/2019. No comment was raised by the NGO.

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IS #	Description
	Issues:
1	<u>Royal Malaysian Army –Sri Jambongan Base Camp</u>
	Genting Jambongan Estate & Mill has given a good cooperation to the Royal Malaysian Army team. Example
	are water supply request from army camp base provided by Genting management, Genting management's
	assistance during the Ministry of Defence visit and army patrol during Genting visitor. The safety and
	security in Jambongan Island is still under control and so far, there is no encroachment issue from outsider.
	Management Responses:
	Management noted on the information and will continue the good practices.
	Audit Team Findings:
	No other issue.
	Issues:
2	Klinik Kesihatan Jambongan
	There is about 42 Genting foreign workers has a total of RM 4,805.00 debts with Klinik Kesihatan especially
	on the maternity issue. Nurses & Medical Assistant has already raised the issue during stakeholder meeting
	last year on November 2018 however still not solved. The patients are commonly didn't has enough money
	and deposited less than the registration price which making it difficult for receipt issuance from Klinik
	Kesihatan.Since the issue is keep repeating, the clinic team suggested that if there is pregnant foreign
	worker, please send them back to have the proper treatment from home country.
	Management Responses:
	Management will take action on the workers involved and solve this issue with KK.
	Audit Team Findings:
	Will be verified in the next surveillance audit.
	Issues:
3	<u>SK Jambongan</u>
	There is no foreign worker's children study in SK Jambongan at the moment. However, if the parents have
	a valid document, they can always register their children by fill in the form in school and it will be submitted
	to PPD for approval first. If approved, the children can register in SK Jambongan. Management also give
	contribution on the clean water request to school.
	Management Responses:
	Management noted on the information and will continue the good practices.
	Audit Team Findings:
	No other issue.
-	Issues:
4	Genting Auxiliary Police
	So far, the security in Jambongan Island is under controlled. The patrolling on estate was conducted
	continuously and they were having a good cooperation with the Royal Army Malaysian team in the island.
	Management Responses:
	Management noted on the information and will continue the good practices.
	Audit Team Findings:
	No other issue.
_	Issues:
5	Ketua Anak Negeri – Kampung Jambongan
	Management has contributed on the clean water and water tanks to the villagers in Jambongan Island.
	Apart from that, the road maintenance, culvert installation and job opportunity also provided by both
	Genting Jambongan Oil Mill and Genting Jambongan Estate.
	Management Responses:
	Management noted on the information and will continue the good practices.
	Audit Team Findings:
	No other issue.

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Genting Jambongan Palm Oil Mill has complied with the 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 Jambongan Palm Oil Mill Certification Unit is approved.

Report prepared by	Acceptance of Assessment Conclusion
Name:	Name:
Mohd Hafiz Mat Hussain	Arunan Kandasamy
Company Name:	Company Name:
BSI Services Malaysia Sdn Bhd	Genting Plantations Berhad
Title:	Title:
Lead auditor	Senior Vice President-Plantation
Signature:	Signature:
Hen fore	(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.) Genting Plantations Berhad (34993-X) XA/K ARUNAN KANDASAMY
Date: 23/07/2019	Senior Vice President PLANTATION (MALAYSIA) Date: 13/08/19



Appendix A: Summary of Findings

Criterion	/ Indicator	Assessment Findings	Compliance	
Principle	Principle 1: Commitment to Transparency			
Criterion	1.1:			
Growers a	and millers provide adequate information to relevant stakeho	olders on environmental, social and legal issues relevant to RSPO Crite	ria, in appropriate	
languages	s and forms to allow for effective participation in decision ma	aking.	-	
1.1.1	There shall be evidence that growers and millers provide	, ,	Complied	
	adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant		Complied	
	stakeholders for effective participation in decision making.	dialogs, engagement to both internal & external stakeholders and		
	- Minor compliance -	recorded in Genting Plantations Complaints/Grievance Record Book		
		– GJOM. Sighted latest complaints recorded in 17.07.2018 from DOE		
		Kota Kinabalu branch. Sighted also enquiry register book with latest		
		enquiry received by GJBE from Headmaster, SK Jambongan (enquiry		
		ref.#031; dated 16/8/2017) on request to pick up the preschool students early. In GJBE, the Police Officer has requested the		
		accommodation for Community Policing program from 18-		
		19.05.2019 (enquiry no: #077 dated 13/05/2019)		
		Procedure for Complaints and Grievances for Workers, Suppliers,		
		Contractors and Other Stakeholders of Genting Jambongan Estate		
		with Flow-Chart (1a) on handling complaints and grievances		
		extended to estate/mill management as per SMPM: Complaints &		
		Grievances, Doc No: SMP-GPB-19 Revision 03 dated 21.03.2018.		

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1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	<u>Mill:</u> Implemented based on Sustainability Management Procedure for Consultation and Communication; SMP-GPB- 17; Rev. 02; Date: 23/02/2018. Consultation & communication done through meetings, dialogs, engagement to both internal & external stakeholders and recorded in Genting Plantations Complaints/Grievance Record Book – Estate: GJBE.	Complied
		Estate: Implemented based on Sustainability Management Procedure for Consultation and Communication; SMP-GPB- 17; Rev. 02; Date: 23/02/2018. Consultation & communication done through meetings, dialogs, engagement to both internal & external stakeholders and recorded in Genting Plantations Complaints/Grievance Record Book – Estate: GJBE. Sighted latest complaints received by internal stakeholder (ref. #016; dated 13/02/2019) on request to change from wood gate to metal gate. And settled on 01.03.2019. No any external complaints/grievances received from external stakeholder. Specific to Jambongan Estate – Procedure for Complaints and Grievances for Workers, Suppliers, Contractors and Other Stakeholders of Genting Jambongan Estate with Flow-Chart.	
		 Publicly available documents sighted available which reported in respective criterions in this checklist. Policies also made publicly available that was Established as Sustainability Management Group Policies as following: Sustainability Policy; Rev. 00; Date: 3/8/2009 Occupational Safety & Health Policy Date: 01/7/2018 Environmental Policy; Rev. 00; Date: 5/10/2009 People Policy; Rev. 00; Date: 3/8/2009 Sexual Harassment Policy; Rev. 00; Date: 3/8/2009 Zero Burning Policy; Rev. 00; Date: 10/8/2011 	

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	Compliance
 Food Safety Policy; Rev. 00; Date: 2/2/2010 Whistleblower Policy; Rev. 00; Date: 4/4/2013 MSPO Policy; Rev. 00; Date: 18/3/2014 Policy on Ethical Conduct and Integrity; Rev. 00; Date: 22/6/2015 Social Policy (Incorporating Special Labour and Human Rights requirements); Rev. 00; Date: 22/6/2015 All policies were available in dual language (BM & English) and 	
signed Genting Plantations Berhad President & COO.	
	 Whistleblower Policy; Rev. 00; Date: 4/4/2013 MSPO Policy; Rev. 00; Date: 18/3/2014 Policy on Ethical Conduct and Integrity; Rev. 00; Date: 22/6/2015 Social Policy (Incorporating Special Labour and Human Rights requirements); Rev. 00; Date: 22/6/2015

negative environmental or social outcomes.

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Criterion	/ Indicator	Assessment Findings	Compliance
1.2.1	 Publicly available documents shall include, but are not necessary limited to: 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). 	 Publicly available documents sighted available which reported in respective criterions in this checklist. Policies also made publicly available that was Established as Sustainability Management Group Policies as following: Sustainability Policy; Rev. 00; Date: 3/8/2009 Occupational Safety & Health Policy Date: 01/7/2018 Environmental Policy; Rev. 00; Date: 5/10/2009 People Policy; Rev. 00; Date: 3/8/2009 Sexual Harassment Policy; Rev. 00; Date: 3/8/2009 Zero Burning Policy; Rev. 00; Date: 10/8/2011 Food Safety Policy; Rev. 00; Date: 2/2/2010 Whistleblower Policy; Rev. 00; Date: 4/4/2013 MSPO Policy; Rev. 00; Date: 18/3/2014 Policy on Ethical Conduct and Integrity; Rev. 00; Date: 22/6/2015 Social Policy (Incorporating Special Labour and Human Rights requirements); Rev. 00; Date: 22/6/2015 All policies were available in dual language (BM & English) and signed Genting Plantations Berhad President & COO. 	Complied
Criteria 1			
Growers a	nd millers commit to ethical conduct in all business operation	ons 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	Policy on Ethical Conduct and Integrity; Rev. 00; Date: 22/6/2015. Displayed in strategic locations within mills and estates notice boards and communicated to all level of employees during daily muster assembly, briefings and meetings. The policy briefing was conducted on 27.04.2019 to all 29 workers (GJOM) and on 08.01.2019 and 13.03.2019 to all 361 workers (GJBE).	Complied
Principle	2: Compliance with applicable laws and regulations		1



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

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2.1.1	Evidence of compliance with relevant legal requirements shall be available. - Major compliance -	Genting Jambongan Oil Mill and supply base were committed to comply all the relevant legal requirements. Among the evidence (license/permits) verified during the assessment were:	Major nonconformance
		 A) <u>Genting Jambongan Oil Mill</u> Permit barang kawalan berjadual-S014574, validity 3/8/2018 – 2/8/2019 Lesen bagi pepasangan persendirian-2019/00920, validity 8/5/19-7/5/20 Lesen untuk Menggaji Pekerja Bukan Pemastautin-JTK.H.SDK.600-4/1/1/10401/0007217, validity 1/4/19 – 31/3/20 Fire certificate – 309123, validity 6/7/18 – 5/7/19 DOE License – 004843, validity 1/7/2018-30/6/2019 MPOB License #587904004000, validity 1/8/18 – 31/7/2019. Steam Engineer: 023/2017, Grade 2 Perakuan Kekompetenan Sebagai Penjaga Jentera #PJ-T-1-B-0535-2014, Grade: AO AESP: NW-AE-0001-P, valid until 10/3/2021 	
		 AGT: NW-NSDK-AGT-R-0050-O Engine driver (Boilerman): SB/18/EIS/02/00072) Grade 2 	
		 DOE License/Jadual Pematuhan: license no. 004843 (validity period 01/07/2018 - 30/06/2019) for 20 MT/hr and method of POME discharge is composting (zero discharge) MPOB license: 587904004000 [selling and moving of FFB, PK, CPO and SPO] (validity period 01/08/2018 - 31/07/2019), approved processing capacity: 120,000 mt Diesel permit serial no: S014574, ref: PPDNKK.SDK.25/2005(SK) BL22018032537, validity 3/08/2018 - 2/08/2019, approved quantity: 60,000 litre. Fire Certificate Ref. No. JB PM:SB/7/119/2018 S/N: 309123, validity 6/07/2018 - 5/07/2019 	

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 5. Competent Person Certified Environmental Professional in Scheduled Waste Management (CePSWaM) (attended training on 20/11/17-24/11/17). Field Training Report (FTR) submitted on October 2018 and waiting for interview. 6. Electrical Installation License, serial no. 35875, license no. 2019/00920, registered capacity: 4,640 kW valid from 8/5/19 to 7/5/19. 7. Competent Person Steam Engineer, (Grade 2) ref. no. 023/2017 Engine Driver, (Grade 2) ref. no.: SB/14/EIS/02/47 Internal Combustion Engine, (Grade 1) ref. no.: SB/14/EIP/01/9 Internal Combustion Engine, (Grade 2) ref. no.: SB/11/EIP/02/48 Electrical Charge man license, (AO – low voltage [no aerial transmission and generation]), ref. no.: PJ-T-1-B-0535-2014, s/n: PJ 1130272. Authorized Gas Tester and Entry Supervisor for Confined Space (AGT ES): NW-NSDK-AGT-R-0050-O valid until 15/5/20. Authorized Entrant and Standby Person for Confined Space Refresher (AESP): NW-NSDK-AE-R-0256-O valid until 14/5/20, 8. Contravene of Licence (CL), refer to compliance schedule, LP/PUB 2014/S/12/013777 validity period (13/9/17 – 30/6/18). For the new license period from (01/07/2018 - 30/06/2019), no evidence to show that the CL has been obtained to contravene clause 16 of Jambongan Oil Mill's compliance schedule (004843). Written notification under regulation 5, Clean Air Regulation 2014: notification for installation of 1 (one) unit ESP for Jambongan Oil Mill. Refer to ASSH(B)31/152/000/185 Jld 6 (3) dated 2/5/19. 	
 B) Genting Jambongan Estate MPOB License #509406502000, validity 1/12/18 - 30/11/2019. Lesen bagi pepasangan persendirian, #2018/01334, #2018/01331 validity 26/7/18-25/7/19 and #2018/01333, 	

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 validity 8/7/18-7/7/19 Lesen untuk menggaji pekerja bukan pemastautin, validity 13/8/18-12/8/19 Certificate of fitness (CF) #SB PMT 13039, validity until 4/6/20 for air receiver Boat License #LC SSK 2018/49263, valid until 29/10/2019 Small Ship License #0467/2017 1469/2018, valid until 13/12/19
 The line site inspection was conducted on 27.03.2019 for GJOM. There was no other inspection carried out after that. This is not comply with Minimum Housing & Amenities Act 1990. For GJBE, the line site inspection has been made in weekly basis however the report is not reflected as per actual situation during the site visit. Examples seen are: no soap, formula milk and bad ceiling condition at Creche Ayah and no fire extinguisher in the report for monitoring, no recycle bin, bad condition of septic tank, piping from water treatment plant to house tank is broken. In GJBE, there is no approval from the Labour Department on salary deduction for replacement of damage tools. Example sighted for: Apolonarius Hetti (E1690) Feb 19, Mar 19 and Apr 19 pay slip. Petrus Baluk (E01615) Feb 19 and Apr 19 pay slip In GJOM, there is no approval from the Labour Department on overtime limit more than 104 hours/month. Verified the overtime record in punch card for Mohamed.S on Nov 18 and Dec 18.
 The line site inspection was conducted on 27.03.2019 for GJOM. There was no other inspection carried out after that. This is not comply with Minimum Housing & Amenities Act 1990. For GJBE, the line site inspection has been made in weekly basis however the report is not reflected as per

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Criterion / Indicator	Assessment Findings Comp	liance
	 actual situation during the site visit. Examples seen are: no soap, formula milk and bad ceiling condition at Creche Ayah and no fire extinguisher in the report for monitoring, no recycle bin, bad condition of septic tank, piping from water treatment plant to house tank is broken. 4. In GJBE, there is no approval from the Labour Department on salary deduction for replacement of damage tools. Example sighted for: Apolonarius Hetti (E1690) Feb 19, Mar 19 and Apr 19 pay slip. Petrus Baluk (E01615) Feb 19 and Apr 19 pay slip In GJOM, there is no approval from the Labour Department on overtime limit more than 104 hours/month. Verified the overtime record in punch card for Mohamed.S on Nov 18 and Dec 18. 	
	Thus, the Major NC was raised.	

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Criterio	n / Indicator	Assessment Findings	Compliance
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	 Documented system including Legal Requirements Register (Doc: SMP-GPB-22; revision 07 dated 19/07/2019) is available. The content of the register as below: List of local legal requirements applicable to plantation operations in Malaysia List of international standards/requirements applicable to plantation operation in Malaysia: Part 1: Environment Part 2: Safety and Health Part 3: Social Part 4: Best Practices and other requirements Part 5: International Standards/Requirement 	Complied
		The latest revision has incorporated changes on Environmental Quality (Clean Air) Regulations 2014 and Employees Social Security (exemption no.2) Notification 2018.	

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Criterior	/ Indicator	Assessment Findings	Compliance
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	Mechanism to ensure compliance is being demonstrated through self-compliance monitoring. An annual internal audit will be carried out prior to any external audit to determine the state of compliance. The latest internal audit was conducted on 28-29/3/19 combined with other sustainability scheme audit. A few environmental related issues were identified for improvement.	Minor nonconformance
		In addition, as per DOE's Guided Self-Regulation (GSR) an Environmental Performance Compliance Committee (EPMC) has been established to monitor compliance against mill's compliance schedule. Periodic review is carried every 3 months by the committee. Refer to the latest EPMC meeting dated 4/2/19. No non- compliance issues reported as of yet.	
		 However, the assessment done by the management for ensuring compliance was not capture the non-compliance as follow: 1. No Boilerman 1st Grade at GJOM as commented by DOSH Officer (visit on 5/3/2019) and required by regulation. 2. No visiting engineer at Genting Jambongan Oil Mill 3. The current competency for electrical chargeman (Grade: AO) was not accordance with the act. 4. Contravene of license (CL), refer to compliance schedule, LP/PUB2014/S/12/013777 validity period (13/9/18-30/6/18). For the new license period (01/07/2018-30/06/19), no evidence to show that CL has been obtained to contravene clause 16 of Jambongan Oil Mill's compliance schedule (004843) 	
		Thus, minor NC was raised.	

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CITCEITO	on / Indicator	Assessment Findings	Compliance
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	 Genting Plantations Berhad has established a documented Procedures on Regional, National and International Laws (Doc: SMP-GPB-21; revision 01 dated 14/08/2014) for tracking any changes in the law. For the changes of laws, the company will refer to as below: 1. Notification of changes from various source of information 2. Monitoring for changes in the Law 3. Clarification and review on the changes 4. Updating of the Legal register administered internally 5. Notification to the operating units and/or the relevant person in charge 	Complied
Criterio	n 2 2·	Currently, the person/team responsible for monitoring the changes and communicating in POM is the Mill Engineer.	
-		ntested by local people who can demonstrate that they have legal, cust	omary or user
The righ ights. 2.2.1		Land title was available and reviewed by the assessor. The mill was sitting on Genting Jambongan Estate land. The land title was belong to Genting Plantation. Through interview with stakeholders, there is no evidence that the use of land diminish the land use rights of other surrounding community.	comary or user Complied

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Criterio	n / 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 -	The process established as Sustainability Management Procedure on Conflict Resolution and Handling of Negotiations and Compensations within GENP Estates, Doc no: SMP-GPB-18; Rev. 03; Date: 29/12/2017. No any disputes recorded.	Complied
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	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified.	Complied
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	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified.	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	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified.	Complied
Criterio			
		nary 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 -	There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantation Berhad and land ownership documents verified. Interviewed with the smallholder confirmed that no land dispute reported. The estate is surrounded by smallholders and there is no village settlement near the area.	Complied

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Criterion	/ Indicator	Assessment Findings	Compliance
2.3.2	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: 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; 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; 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. - Minor compliance -	There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantation Berhad and land ownership documents verified. Interviewed with the smallholder confirmed that no land dispute reported. The estate is surrounded by smallholders and there is no village settlement near the area.	Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantation Berhad and land ownership documents verified. Interviewed with the smallholder confirmed that no land dispute reported. The estate is surrounded by smallholders and there is no village settlement near the area.	Complied
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 is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantation Berhad and land ownership documents verified. Interviewed with the smallholder confirmed that no land dispute reported. The estate is surrounded by smallholders and there is no village settlement near the area.	Complied

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Criterion	/ Indicator	Assessment Findings	Compliance		
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.					
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	 Annual business plan in the form of annual budget and the projection for 4 years (2019-2022) was prepared as guidance for future planning. The business plan contains Processing cost, FFB received, CPO production, PK production, utilisation and capital expenditure. Sample of CAPEX for 2019: 1. Construction of air advanced treatment system 2. Installation of sensor for dust monitoring system 3. New milling machine for fabrication 4. Upgrading surau 5. Fencing for crèche ayah 6. Upgrading workshop 	Complied		
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 -	No replanting for the next 10 years since the oldest field was planted in 2004.	Complied		
Principle	4: Use of appropriate best practices by growers and	l millers			
Criterion	4.1: procedures are appropriately documented, consistently imp	Nomented and menitored			

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Criterio	n / Indicator	Assessment Findings	Compliance
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	At GJOM, the procedure was established and maintained. No new procedure or amended procedure after the previous assessment. There was 3 tiers of procedure that established which were Procedure Manual, System Procedure, Standard Operating Manual, Safe Operating Procedure and Environmental Control Procedure. At Genting Jambongan Estate, the Sustainability Management Procedure Manual, Standard Operating Procedures (SOP) and The Oil Palm Manual (latest update on 30/8/13) were established. The manual covering the activity for replanting, oil palm nursery practices, planting techniques, soil conservation and terracing, pest and diseases, weed management, manuring of oil palm, immaturity, harvesting, crop forecasting and managing difficult soils. All of the activities have been described comprehensively in the Standard operating procedure (SOP) and pictorial SOP. The estate implemented through its daily operations.	Complied
4.1.2	A mechanism to check consistent implementation of	investigation, PTW, PPE, workshop, harvesting, manuring, pest & disease were available during the assessment. The management check through internal audit. Internal audit was	
	procedures shall be in place. - Minor compliance -	conducted on 28-29/3/2019. Report of Internal Audit for Genting Jambongan Oil Mill and Estate were found adequate to cover all the documents and activities at the mill and estate.	Complied
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	All the records of monitoring was found available at office to verify by the external auditors.	Complied
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	The origins of all third-party sourced FFB was clearly stated in the weighbridge ticket.	Complied

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			- "
	n / Indicator	Assessment Findings	Compliance
Criterior			
	maintain soil fertility at, or where possible improve soil ferti		
4.2.1	There shall be evidence that good agriculture practices,	GJBE practices good agricultural practices as contained in their SOPs	
	as contained in Standard Operating Procedures (SOPs),	(Oil Palm Manual, dated 30/8/2013). They are followed to manage	Complied
	are followed to manage soil fertility to a level that	the soil fertility to levels ensuring optimal and sustainable yields. One	
	ensures optimal and sustained yield, where possible.	of the SOP procedures, OPM 7: Manuring of Oil Palm is referred for	
	- Minor compliance -	managing soil fertility. It includes sections on:	
		a) Introduction b) Nursery manuring	
		c) Field Manuring	
		d) Application of Fertiliser	
		e) Fertiliser delivery and Stock Reports for estates	
		f) Fertiliser sampling for analysis	
		g) Manuring Schedule	
		h) Method of application for younger and mature palms	
4.2.2	Records of fertiliser inputs shall be maintained.	Fertilizer application program is based on the recommendation by	
	- Minor compliance -	Agronomist and documented in Fertilizer Recommendation Report.	Complied
		Observed the recommendation and implementation record for 2019:	
		Genting Jambongan Estate	
		Fertilizer recommendation 2019 dated 28/2/2019 (Rev02) for mature	
		and immature fields available.	
		Observed application records as per agronomist recommendation:	
		Month program: Jan 19	
		Field: 3/63R	
		Ha program: 9.24Ha	
		Type: AC 25	
		Rate/palm:3.40kg/palm	
		Month applied: April 19 (completed on 6/4/2019)	
		Ha applied: 9.24Ha	

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Criterion	/ Indicator	Assessment Findings	Compliance
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	<u>Genting Jambongan Estate</u> Last soil sampling analysis was carried out on 24/9/2018. Refer report no. SR21/2018 dated 25/10/2018. Last foliar and rachis analysis was carried out on 17/7/2018. Foliar nutrient report (PR71/2018) dated 17/8/2018 was sighted.	Complied
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 -	Compost application was carried out in at 80kg/palm. The latest application was done on April 2019, total 666.90mt for field Block 7, Block 8 and Block 11.	Complied
Criterion			I
Practices I	minimise and control erosion and degradation of soils.		1
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Soil series map available for both estates visited.	Complied
		Genting Jambongan Estate No fragile soil categorized in the estate. Most soil in the estate were Brantian, Dalit, Kapayan, Maliau, Sook and Weston	

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Criterion	/ Indicator	Assessment Findings	Compliance
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 -	<u>Genting Jambongan Estate</u> Terrain classification: 0-2°:38.73%, 2- 6°: 45.82%, 6-12°: 13.54%, 12-20°: 1.90%, 20-25°: 0.01%, >25°: 0.0%	Complied
		Planting terraces had been constructed where slope >10°. Fields are established with cover crops such as muccuna and soft grasses and ferns. The estate will refer to the following procedures for guidance a) OPM 4 : Soil conservation and terracing (rev 2013) b) Steep land Management SMP –GPB-10	
		The estate also has a file known as File 56: Estate Maps & Satellite Images where the following are identified for reference : a) Soil Map b) Slope class map c) Blocking map d) Riparian buffer zone map	
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Soil maps and slope maps were sighted at GJBE. Road maintenance programme was available for year 2019. Among the activities for road maintenance were resurfacing, gravelling, road patching, grading & compacting, frond tip cutting, and construction of roadside drain. Observed during site visit at block 17 and 15 noted that the road was in good condition.	Complied
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at GJBE.	Complied



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Criterion	/ Indicator	Assessment Findings	Compliance
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 -	No peat of problematic/fragile soil at both visited estates	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 -	No peat of problematic/fragile soil at both visited estates	Complied
Criterion Practices n	4.4: naintain the quality and availability of surface and ground w	vater.	



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4.4.1	An implemented water management plan shall be in	Water management plan for raw water & drinking water dated	
7.7.1	place.	20/4/19 was made available for verification. The plan has include the	Complied
	- Minor compliance -	operational control, monitoring and measurement activities and	complica
		management responsibilities assigned for each specific person in-	
		charge. Source of water supply is from river water and undergo	
		treatment process for both boiler water and drinking water. Water	
		analysis is conducted every quarter @ 3 months for domestic water	
		as per established procedure for water sampling and analysis, SMP-	
		GPB-15, rev:01 dated 12/11/14. Refer to the latest water analysis	
		report dated 4 th May 2019, Certificate of Analysis no.: 20190409-05-	
		0. All parameters is in compliance with National Water Quality	
		Standard.	
		For Jambongan Estate, there are 3 divisions (division 1, 3 and 4)	
		having their own water treatment plant. Source of water is mainly	
		from river and catchment area at each division. Water supply from	
		division 2 is from Jambongan Oil Mill water treatment plant.	
		Availability of water source is measured by rainfall data trend. 3	
		years rainfall summary data is reviewed.	
		Year Rainfall data in mm	
		2019 (to date April) 443	
		2018 2,791	
		2017 3,471	
		Comparing with previous 2018 and 2017 data until April, for 2019	
		the trend is going to be ascending.	
		Water analysis is carried out once every 3 months @ quarterly and	
		tested by 3 rd party accredited laboratory. Refer to Dynakey	
		Laboratories Sdn Bhd analysis report summarized as below table:	
		Estate Division Cert. of analysis Remarks	

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Criterion / Indicator Assessment Findings Compliance 20190311-06-0 dated Comply with NWQS 3 8/4/19 12 parameters tested including microbiological content 20190311-07-0 dated Comply with NWQS 4 8/4/19 12 parameters tested including microbiological content Comply with NWQS 1 20190311-05-0 dated 8/4/19 12 parameters tested including microbiological content

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Criterio	n / Indicator	Assessment Findings		Compliance
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.	Manual, Riparian Buffer Zor	Sustainability Management Procedure ne Management, SMP-GPB-14, rev:1 r zones established in lined with Sabah 1998 as per the following:	Complied
	- Major compliance -	River width	Buffer zone	
		> 40 meters	50 meters	
		20 to 40 meters	40 meters	
		10 to 20 meters	20 meters	
		5 to 10 meters	20 meters	
		3 - 5 meters	20 meters	
		rev:01 dated 12/11/14, the conducted once in every 6 mo	r sampling and analysis, SMP-GPB-15, frequency of surface/river water is nth. This is also in-lined with Proposed requirements, ref: JPAS/PP/02/600-	
		identified in the environmen report. Refer to report ref: CF 2018 and ref: CK/MO411/103 on the reports, the water ar	V1-W4) were tested at the location tal monitoring and compliance audit $(MO411/1035-1/18 \text{ dated } 25^{\text{th}} \text{ August}$ $5-2/18 \text{ dated } 8^{\text{th}} \text{ February } 2019. \text{ Based}$ halysis results are in compliance with Vater Quality Standard Malaysia.	

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Criterion	/ Indicator	Assessment Fi	indings			Compliance
1.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in	-	Genting Jambongan Oil Mill is implementing "zero discharge" based on Compliance Schedule, 004843. Discharge method is 100% or composting.			
	compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	part of self-com (pH, BOD, COD Grease, Total independent Lal of analysis, 201 17/1/19. Quarte following record	npliance monito), TSS, Ammor Sold and S o, Dynakey Lab 90302-04-0 da erly report to D d has been rev	oring. Total of 8 nical Nitrogen, To Suspended Solids oratories Sdn Bho ted 9/3/19 and 20 OE has been sub	e every 2 months as 8 parameters tested otal Nitrogen, Oil &) are checked by I. Refer to certificate 0190110-15-0 dated mitted to DOE. The t for 1 st quarter for 2/1/2019	
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	domestic and m	ill/boiler water mmarized on n	. Data recorded b nonthly basis. V	monitored for both based on flow meter erified the following	Complied
		Financial year	FFB processed	Water usage	Water usage per tonne FFB (m ³ /tonne)	
		2019 to date	25,522.66	36,682	1.44	
		Jan – Dec 2018	57,095.52	131,631.80	2.31	
		Jan – Dec 2018	39,662.96	82,263	2.07	

Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.

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Criterion / Indicator		Assessment Findings	Compliance	
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	Documented IPM is found in the Oil Palm Manual under 'Pest and disease (revision June 2013) OPM 5. It identified the pest such as : a) bagworms b) nettle caterpillars c) Grasshopper d) Rhinoceros beetles e) Bunch moth f) Vertebrates such as rats g) Pest & Diseases in nursery h) Ganoderma	Complied	
4.5.2	Training of those involved in IDM implementation shall	The estates also monitors the following for IPM : a) Rat damage census b) Beneficial plant planting c) weed management		
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	Latest training on IPM was conducted accordingly, cross refer with indicator 4.8.1.	Complied	

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Criterior) / Indicator	Assessment Findings	Compliance
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 -	The SOP and the Justification of Pesticide used is sighted in the SMP- GPB-28. It records the : a) Crop stage b) Application Type c) Pesticide Names d) Active Ingredient e) Class (by Pesticide Malaysia) f) WHO class g) Target Weed/Pest h) Justification of Use	Complied
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 -	Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate.The record of pesticides used was sighted.a.i/ha201720180.872GJBE0.872	Complied

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Criterior	n / Indicator	Assessment Findings	Compliance
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 -	Use of pesticide is minimized and part of the IPM programme. To reduce chemical use the following is implemented in GSPE. a) Planting of beneficial plant Documented IPM is found in the Oil Palm Manual under 'Pest and disease (revision June 2013) OPM 5. It identified the pest such as	Complied
		 a) bagworms b) nettle caterpillars c) Grasshopper d) Rhinoceros beetles e) Bunch moth f) Vertebrates such as rats g) Pest & Diseases in nursery h) Ganoderma 	
		It also shows the lifecycles, type of species as well as the chemical, physical and biological control method recommended. Prophylactic used is confined to the spray in the oil palm nursery whereby the seedlings are ensured to be protected.	
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 -	There is no pesticide that are categorised as World Health Organisation Class 1A or 1B at GJBE.	Complied

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Criterion	/ Indicator	Assessment Findings	Compliance
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 -	Training for both estates was conducted accordingly. cross refer indicator 4.8.2	Complied
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 operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.	Complied
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sustainability Management Procedure Manual, SMP-GPB-28. GJBE have tried various method of application that is proven methods that minimise risk and impacts. Some of the spray method used are CKS.	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 -	No aerial spraying was carried out at GJBE	Complied

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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 -	No associated smallholders. The training for employee was conducted accordingly, cross refer to indicator 4.8.2.	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 -	Proper waste disposal according to procedures were sighted. Annually training is conducted to raise awareness of proper waste disposal to workers as well as to the estate personnel. Wastes are identified e.g. domestic waste, scheduled waste, recyclable waste and empty chemical containers. Estates have designated areas to store litter and waste, which do not create a safety or health hazard. The domestic wastes were disposed at designated landfill in the estate.	Complied

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Criterion	/ Indicator	Assessment	Findings			Compliance
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	were demonst	Annual medical surveillance for sprayers and pesticide operators were demonstrated. Medical examination programme established for sprayers which conducted by Klinik Elopura Sdn Bhd (HQ/12/DOC/00/259) for GJBE.			
		ID No	Date of Medical check up	Result	Estate	
		E01533 E01101 E01503	4/7/18	Fit Fit	GJBE	
		E01505 E01506 E01454	-	Fit Fit	-	
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	There were no	female spray	vers that were pregr	nant at GJBE.	Complied
Criterion An occupa		nmunicated and	implemented	I. The health and sa	fety plan shall cover t	he following:

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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 -	At GJOM, the policy for safety and health was established which was signed by Sr Vice President – Group Processing dated 20/7/2017. At GJBE, the policy for safety and health was established which was signed by President & Chief Operating Officer, Genting Plantation on 1/7/2018. The Occupational Safety And Health Policy was established, signed by President and Chief Operating Officer on 1 st July 2015. The policy was communicated during morning muster and displayed prominently on notice boards in English. Health and safety plan was established for 2019.	Complied
		Chemical Health Risk Assessment (CHRA)	
		Genting Jambongan Oil Mill - CHRA was conducted on 16/11/14 – 23/2/2015 by registered assessor JKKP HIE 127/171-2(253). CHRA report (ctcl/chra/16-11/14) was sighted.	
		Genting Jambongan Estate - CHRA was conducted on 17/6/2014 by registered assessor JKKP IH 127/171-2(154). CHRA report dated September 2014 was sighted.	
		Annual Audiometric Testing GJOM – Baseline & Annual Audiometric testing completed on 28/10/18 by DAB OH Sdn Bhd. Total of 20 workers were sent for the annual testing. Sighted report of audiometry test. Results: 2 workers with hearing impairment. JKKP 7 was submitted to DOSH on 12/12/18.	
		Medical Surveillance Medical surveillance was conducted was done by DAB OH Sdn Bhd, on 21/12/2018, OHD registration HQ/18/DOC/00/201. From the report, found that the operator was fit to work.	

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Criterion / Indicator		Assessment Findings	Compliance
	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 -	Periodic Chemical Exposure Monitoring Genting Jambongan POM - The chemical exposure monitoring was conducted on 14/5/2015 by JKKP HIE 127/171-3/1(151) for the laboratory operators and workshop operators was observed. The exposure results of personal monitoring at Laboratory for potassium dichromate, chromic acid and workshop for manganese were compliance with the permissible exposure limit as specified under OSH (USECHH) Regulation 2000. Further chemical exposure monitoring may not be required. SOP for HIRARC (SP-MGR-01) was established. The technique was described accordingly in the SOP. The HIRARC was reviewed on 1/7/18 (GJOM) and 25/1/2019 (GJBE) to include all the activities in the estate, for example, at GJOM, the HIRARC for grading, sterilizer, thresher, press, boiler, laboratory and at GJE, the HIRARC for operate bulldozer, mist blower, spraying activity, pruning activity, operating enjine boat, trunk injection, and vicon activity were sighted.	Complied

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Criterion	/ Indicator	Assessment Findings	Compliance
Criterion 4.7.3	/ Indicator 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. - Minor compliance -	 Assessment Findings Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. #cross refer to indicator 4.8.2. Suitable PPE has been provided to the workers based on the information in the MSDS and CHRA assessor's recommendation. List of Personal Protective Equipment (PPE) Provided – identifies the type of PPE for the respective activities. i. Press/workshop operator – Safety Helmet, Safety Shoes, Safety Vest and Ear plug/muff 	Compliance
		 ii. Field workers (sprayer, manure & harvester) – N95 respirator, anti-mist goggles, wellington boots, apron and sickle cover. During the site visit, it was noted that the PPE will be replaced by the workers when damaged or lost. The chemical store was found to be adequately organized, properly labelled, secured and person in charge understands the OSH procedures. CSDS was placed at the chemical stores and is available. The person in charge understands the information written in CSDS. 	

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Criterion	/ Indicator	Assessment Findings	Compliance
4.7.4	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. - Major compliance -	SHC Organization – Chairman : Sr Ast. Mill Manager and Estate Manager	Complied
		Refer OHS meeting minutes (GJBE)– #14/2/19, #15/11/18, #15/8/18 Appointment letter dated 24/4/2018 for safety committee member was sighted. Eg: weighbridge operator, store attendant.	
4.7.5	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 -	The Estates and mill has continued to maintained site specific Plans in the System Procedure, Emergency Response Procedure (SP-MGR- 04), Rev:0, Dated 1/8/17) including ERP for oil spillage, fire in the mill, effluent overflow, accident and chemical spillage. Maps showing assembly areas and up-to-date lists of emergency contacts were also established. The fire drill training conducted on 23/7/18 (GJOM) and 28/3/17 (GJBE) to communicate the Plan. Interviews of staff and workers confirmed understanding of emergency response procedures. Training for first aid was conducted on 24/7/18 by competent first aider to the operators in the mill. First aid box was available during site visit.	Complied

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Criterio	n / Indicator	Assessment Fin	dings			Compliance
4.7.6	All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -		OCSO scheme v	the employees. Lo while foreign work tion scheme. Remark E00093, E00070, E00121, E00020, E00082, E00128		Complied
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -		accident were	d reported to Hea available at mill of		Complied
Criterio	n 4.8:					
All staff,	workers, smallholders and contract workers are appropriatel	y trained.				
4.8.1	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 -	A formal training Criteria has been programme for G operators, includ	established ar JOM and GJBE. ing all field a and training nee	all aspects of RSP nd implemented. F Training for vario nd office staff, w ds had been review	Refer to training ous categories of with regards to	Complied

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riterio	n / Indicator	Assessmen	t Findings		Compliance		
.8.2	Records of training for each employee shall be	Records of tr	aining for employees available and	d maintained. Records			
	maintained.		verified on a sampling basis at the Mill and estates visited covers all				
	- Minor compliance -	aspect of tra	ining and RSPO P&C.				
			Training records checked as follow:				
		Date	Training Topic	Remark			
		12/3/19	Boiler station	GJOM			
		11/3/19	FFB Grading				
		20/3/19	Composting plant				
		15/3/19	Kernel plant				
		15/3/19	Sterilizer station				
		9/3/19	HIRARC Workshop				
		14/3/19	Harvesting	GJBE			
		5/3/19	Manuring				
		12/3/19	HIRARC				
		28/1/19	Spillage kit				
		16/4/19	Working at height				
		2/3/19	Tractor handling				
		11/4/19	Water treatment plant				
		1/3/19	Rat baiting				
		18/3/19	First aid				
		7/4/19	Fire extinguisher				
		26/6/18	Manuring				

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.

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Criterion / Indicator	Assessment Findings	Compliance
5.1.1 An environmental impact assessm documented. - Major compliance -		there is pact to 4/2019 e some billution, A has ng from fication d. The " <i>Surat</i> Genting t (EPD) <i>at Alam</i>

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Criterio	n / Indicator	Assessment Findings	Compliance
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 -	The continuous implementation of the improvements activities were checked during the field and document audit. An annual objective target and programme (OTP) is set and derived from significant environmental impacts identified. Each OTP's area supported with the environmental management programme to keep track the performance. Summary of OTP's checked:ObjectiveandManagement plan	Complied
		TargetIndicatorZeronon-i) Smoke Density RecordedCEMS & stackcomplianceof(SDR)serviceandblack smokecalibration every 6 monthsamplingii) Operational control –furnace racking, no overfeeding etc.iii) Monitoring of opacityiii) Monitoring of opacityindicator	
		Wateri)Operational control – zeromonthly waterconsumptiondilution, dry cleaningconsumption(0.64%/FFBmethod, turbinecoolingprocessed)water recyclerecordii)100%recycleofwater harvestingvater	
		Environmental Management Plan (EMP) dated 20 th April 2019 available for verification. All source of pollution [air, water, noise and soil] were identified with the proposed mitigation and monitoring plan. A specific staff and executive have been appointed to do the monitoring to ensure the plan is effectively implemented. For Jambongan Estate, the management plan and mitigation measures is developed based on Approved Environmental Conditions (AEC) @ " <i>Perjanjian Syarat-syarat Alam Sekitar (Seksyen 12E(1))</i> <i>Enakmen Perlindungan Alam Sekitar, Pindaan 2012</i> " ref JPAS/PP/02/600-1/11/1/229.	

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5.1.3	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. - Minor compliance -	An environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. Continuous awareness training programme has been carried out by the company to its workers and other stakeholders. As part of DOE's Guided Self-Regulation (GSR), quarterly Environmental Performance Monitoring Committee (EPMC) meeting is carried to review current state of compliance for each quarter. On top of that, monitoring plan was established based on DOE license compliance schedule which include scheduled waste storage and disposal record and boiler stack sampling.	Complied
		<u>Genting Jambongan Estate</u> For estate, monitoring protocol is based on conditions stipulated under <i>Perjanjian Syarat-syarat Alam Sekitar (Seksyen 12E(1),</i> <i>Enakmen Perlindungan Alam Sekitar, Pindaan 2012"</i> ref: JPAS/PP/02/600-1/11/1/229. Monitoring by by 3 rd party consultant to carry out every 6 month.	
		Environmental monitoring & compliance audit report (1 st report of year 2018) AEC ref no: JPAS/PP/02/600-1/11/1/229, report no: CK/MO411/1035-1/18, report no: 4, dated 25 th August 2018 by Chemsain Konsultant Sdn Bhd was made available.	
		Compliance visit audit: 10-11 th July 2018 Water quality sampling: 10 th July 2018 Compliance status: 1 non-compliance issue (emergency response plan) for management and prevention of fire.	

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Criteric	on / Indicator	Assessment F	indings	Compliance		
		Environmental monitoring & compliance audit report (2 nd report or year 2018) AEC ref no: JPAS/PP/02/600-1/11/1/229, report no CK/MO411/1035-2/18, report no: 5, dated 8 th February 2019 b Chemsain Konsultant Sdn Bhd was made available.				
		Water quality sa Compliance sta	t audit: 8 th January 2019 ampling: 8 th January 2019 atus: zero non-compliance raised. Previous non- e has been resolved.			
Criterion 5.2: The status of rare, threatened or endangered species and other High by plantation or mill management, shall be identified and and operation 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 corriders)		n Conservation Val	ue habitats, if any, that exist in the plantation or tha	could be affected		
	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).	tions managed to b The inventory o Son Kheong wh Plantations. Ba management ar	best ensure that they are maintained and/or enhance of the HCV sites was conducted in FY2010 by Dr Yap ich covered all the Sabah region estates of Genting ased on the findings of the assessment, the and monitoring plan for HCV areas report dated 10 th			
	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level	tions managed to b The inventory o Son Kheong wh Plantations. Ba management ar October 2014.	best ensure that they are maintained and/or enhance f the HCV sites was conducted in FY2010 by Dr Yap ich covered all the Sabah region estates of Genting ased on the findings of the assessment, the	d.		
	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).	tions managed to I The inventory o Son Kheong wh Plantations. Ba management ar October 2014. identified at Ger	best ensure that they are maintained and/or enhance f the HCV sites was conducted in FY2010 by Dr Yap ich covered all the Sabah region estates of Genting ased on the findings of the assessment, the nd monitoring plan for HCV areas report dated 10 th High Conservation Value (HCV) areas have been nting Jambongan as per the following:	ed.		
	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).	tions managed to I The inventory o Son Kheong wh Plantations. Ba management ar October 2014. identified at Ger	best ensure that they are maintained and/or enhance f the HCV sites was conducted in FY2010 by Dr Yap ich covered all the Sabah region estates of Genting ased on the findings of the assessment, the nd monitoring plan for HCV areas report dated 10 th High Conservation Value (HCV) areas have been nting Jambongan as per the following:	ed.		

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5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill	Management pla Estate summarize	Complied	
	operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented	HCV	Management Plan	
	through a management plan. - Major compliance -	1.2 and 1.3	To protect existing vegetation and erection of signage	
			Fauna species found False Gharial and Proboscis Monkeys – maintain 30m buffer belt with the residual forest area	
		4.2	Protection of steep area by prescribing no disturbance to the vegetation and no planting for the next cycle.	
		5	Continuous consultation with the local communities so as to discourage further activities within estate.	
			Any illegal harvesting should be reported to the authority.	
		4.1	Establish buffer zone as per Sabah Water Resource Enactment 1998. With the proposed riparian reserve of 5 m and 20 m width along each river bank. Sg Limau, the approx. total area is 1.55 hectares. Sg Ginday, the approx. total area is 0.93 hectares.	
			To map important water resource areas, and to place signboards, to provide protection/buffer to the location.	

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Criterion / Indicator	Assessment Findings	Compliance
	To inform stakeholders on importance of watershed protection.	
	To install poles in red and white paint to show distance of buffer zone.	
	To include the buffer zone and potential erosion area in the map	
	Land or vegetation cover in the high potential erosion area should be well maintained, or should be improved if necessary.	
	To avoid any weeding or manuring activities on palms within the buffer zone.	
	To place signages informing stakeholders on HCV area	
	To socialize the importance of conservation of buffer zone to sprayers and general workers	
	Regular patrols within the operating unit estates were carried out and findings recorded by the respective Estate executives to monitor the Conservation / buffer zone areas. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented. Management and monitoring plan for HCV areas dated 2/5/19 was made available at Genting Jambongan Estate. Sighting records were verified. Refer to monitoring report dated 14/1/19, 14/3/19 and 14/5/19. No illegal activities and encroachment reported within the area.	

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Criterion	/ Indicator	Assessment Findings	Compliance
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 -	The program to regularly educate the workforce and community about the status of these RTE species are also established with on- going consultation with the relevant authorities from Forestry and Wildlife Department. There is evidence of commitment to discourage any illegal or inappropriate hunting, fishing or collecting activities via the signage erected around the affected areas which prohibit such activities. In 2019, awareness was given to workers on 12/3/19 with regards to riparian zone training	Complied
5.2.4	 Where a management plan has been created there shall be ongoing monitoring: 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 - 	The management of the individual estates has taken action to discourage any illegal or inappropriate hunting, fishing or collecting activities. During site visit, 'no hunting' signs has erected at the different strategic location at Genting Jambongan Estate. Awareness training/meeting to the workers and local communities to discourage hunting and disturbance to the natural areas has been carried out at both estate. Monitoring at the HCV area make available during onsite visit. Site verification to the HCV area of within Genting Jambongan Estate confirmed that all signage at conservation areas are well maintain. No activities had carried out in that area. Stakeholders being informed about the HCV assessment and monitoring result through meeting.	Complied
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 -	There was no HCV set-aside that needs any negotiation process with the local communities	Complied

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Criterion	/ Indicator	Assessment Findings	Compliance
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	The documentation and identification of all the waste products such as scheduled waste, domestic waste and recyclable waste such as metal, plastic, mill waste and polluting materials e g. POME, EFB compost, stack emissions and boiler ashes were maintained and monitored at the mill. Refer to waste management plan dated 16/5/18. At palm oil mill - Type of waste generated:	Complied
		a. Scheduled waste (SW305, SW322, SW409, SW 322 and SW410) domestic waste and recyclable waste. These categories include: POME, fibre/shell, EFB, boiler clinkers, wash water, scrap metal, scheduled waste and hydro-cyclone water.	
		 Estate - Type of waste a. Scheduled waste - SW102, SW109, SW305, SW306, SW322, SW409, SW410, SW404 - workshop, clinic, SW store, store; b. Domestic waste - rubbish & sewage - line-site, office, workshop, store, shop & c. Recycle waste - empty container, waste oil d. Industrial waste - Scrap iron 	
		Records on the usage and disposal were well recorded and documented. Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be maintained accordingly	

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5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	accordance with the Stores for schedul and disposal was authorized and lice estates also have scheduled waste	their schedule on wast led waste were inspect s done by scheduled ensed by Department of e a proper Scheduled	containers were done in the management as planned. ted at audited sites i.e. Mill d waste disposal company of Environment. The mill and d Waste Store for storing by DOE authorized waste rds checked:	Complied
		Operating Unit	Contractor	Disposal records	
		Genting Jambongan Oil Mill	Scheduled waste (SW 410,SW 305,SW 409) Lagenda Bumimas	Consignment notes no.: i) 2019021811RB68KE dated 16/2/19 for SW410, quantity: 0.098 mt ii) 2019021811SKLM5I dated 23/10/18 for SW409, quantity: 0.016 mt	
				iii) 2019021810QF4A1T dated 16/2/19 for SW305, quantity: 1.035	
				Latest inventory as at 27/4/19	
				SW 305 – 0.185 mt SW 410 – 0.305 mt	

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Criterion / Indicator	Assessment Findings	Compliance
	Jambongan EstateScheduled (SW 305,SW 409)Consignment notes i)i)A030853 16/2/19c	no.: Jated V410 ags),
	ii) A030854 c 16/2/19 for SV (used oil filter), quar 0.128 mt	V410
	iii) A030855 c 16/2/19 for SV (used lubricant quantity: 1.0 mt	V305
	Recycle waste (empty chemical Disposal records Form datd 20/2/19)	ction
	container) Contractor : G- Planter 4 liter container pcs (plastic), 9 (metal)	
	20 liter – 31 pcs	
	10 kg – 480 pcs	
	Ally bottle 500g – 7	

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Criterior	n / Indicator	Assessment Findir	ngs			Compliance
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	Action plan to manage the disposal of wastes is documented in the Waste Management Action Plan dated 16/5/18. Among the method of disposal are through Scheduled Waste Regulation 2005 compliance, landfill, application of industrial waste at the estates (e.g. EFB compost) and creating awareness among the employees through 3R activities. Domestic waste is disposed through landfill located at block 13.				Complied
Criterior Efficiency	5.4: of fossil fuel use and the use of renewable energy is optim	ised.				
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	Monthly record on er renewable sources v optimise use of ren comparison and con genset for electricity used to generate ele The use of energy monthly to compare the Electricity generation and shell were used respectively. Renewa Palm Oil (CPO) sumr	were kept and conewable energy trol for future in y generation, pre- ctricity through in palm oil mil the energy usage n was through s as renewable en able energy (kW	locumented. It provement. A ress fibre and s steam turbine a l and line site e against the pro- team turbine w hergy/fuel on a h) usage per	is monitored to ng compiled for part from diesel shells were also and boiler. was monitored oduction of CPO. there press fibre 70:30 ratio basis	Complied
			CPO production	kWh turbine	kWh/CPO	
		2019 to date	5,773.14	544,632	94.34	
		January – December 2018	12,953.57	1,176,096	90.79	

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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.	No burning policy is available and signed by Mr Yong Chee Kong (President & Chief Operating Officer) dated 10 Aug 2011 and no evidence of open burning was observed during onsite visit to the line site as well as the areas surrounding the office.	Complied
	- Major compliance -	Prohibition use of fire during land preparation stage detailed out under generic agreement for land preparation. As stipulated in the contract; Para 2.3 – compliance with RSPO/MSPO/ISCC requirements related company policies (iv) Zero Burning Policy under Schedule 2; scope of works/work order guidelines. No use of fire for land preparation during new planting and verified during site review at Genting Jambongan Estate.	
	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 -	No replanting at Genting Jambongan Estate. The first planting was done in 2014.	Complied



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5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -		t Impact for ident	vas conducted under ifying activities that t	Complied
		•	stack have to be mor	icense no. 004843, air nitored twice per year.	
		Date of monitoring	Stack no.1	Stack no.2	
		24/1/18 report reference MS/GJOM/2018/Boil er No.1 (S1)- 1 st half	Solid particle (dust) - 0.128 g/m ³ , dry@ 12% CO ₂ .	Solid particle (dust) – 0.131 g/m ³ , dry@ 12% CO ₂	
		26/1/18 report reference MS/GJOM/2018/Boil er No.2 (S2)- 1 st half			
		5/9/18 report reference MS/GJOM/2018/Boil er No.1 (S1)- 2 nd half	Solid particle (dust) – 0.29 g/m ³ , dry@ 12%CO ₂ .	Solid particle (dust) – 0.149 g/m ³ ,dry@12% CO ₂ .	
		6/9/18 report <u>r</u> eference MS/GJOM/2018/Boil er No.2 (S2)- 2 nd half			

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Cuitouiou	/ Tadiastan	Accessed Findings	Compliance
Criterio	n / Indicator	Assessment Findings	Compliance
		The emissions of all parameters tested were complied with their respective limits as stipulated in the EQ (Clean Air) Regulations 1978.	
		Smoke emission was monitored using online system (CEMS-DIS) to DOE based on the transmitted data from boiler smoke density indicator and recorder. Emission result was found in compliance with the regulatory limit.	
		For noise pollution, a baseline boundary noise monitoring was carried out on 8th November 2017 by 3rd party consultant Rehpro Scientific Sdn Bhd. The monitoring is to determine aggregation noise level at mill's boundary in accordance with schedule 1, maximum permissible sound level (L_{Aeq}) by receiving land use for palling and development [commercial business zone: day – 65 dB(A), night – 55 dB(A)]. Based on the report, average sound level (L_{Aeq}) comply with the standard by DOE for category of Commercial Business Zones during day time and night time. Since then, there was no changes or modification made in the mill that may resulting to increase of aggregation noise emitted from mill operation.	
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Significant pollutants and greenhouse gas (GHG) emissions were identified includes smoke/soot from vehicle and stack emission and fertilizer usage have been documented. Further reduction of GHG emission can be seen with the operation of composting plant by the application of aerobic process which reduce the emission of methane compared with normal anaerobic digestion process. Refer to Significant Pollutants and Greenhouse Gas (GHG) Emission – Reduction and Minimization Plan dated 3 rd March 2019	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
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 -	Tools and systems used to monitor significant pollutants includes the DOE CEMS monitoring system for air emissions on real time basis. Moving forward, to further reduce the emission and in compliance with Clean Air Regulation 2014. The new air pollution control system namely Electro-Static Precipitator (ESP) will be installed in by end on 2019.	Complied
		Mill discharge method is composting where 100% of POME utilized for composting process. Leachate is collected and recycled-back to the system.	
		For GHG, monitoring tool used is based on RSPO approved calculator, Palm GHG V 3.0.1.	
Principle Criterio		ndividuals and communities affected by growers and millers.	
Aspects of	of plantation and mill management that have social impacts,	including replanting, are identified in a participatory way, and plans to	mitigate the
	impacts and promote the positive ones are made, implement		
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	GJBE: Social Impact Assessment (SIA) and Human Rights Impact Assessment (HRIM) Report; Genting Jambongan Mill (GJOM) by Ronlie Ronney-Sustainability Department; Date: 31/03/2019 and on 31/03/2019 (GJBE). Key areas are channel of communication, boundary, safety & health, environment, security, etc.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	The Social Management and Monitoring Plan were last updated on 20/04/2019 (GJOM) and on 23/03/2019 (GJBE) based on review made through stakeholder consultation meeting. Meetings were attended by both relevant internal and external stakeholders.	Complied

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5.1.3		Assessment Findings	Compliance
	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 -	 Based on SIA & HRIM studies, a Social Management and Monitoring Plan were established. For GJOM and sampled estates, the plan includes Procedures and Responsibilities for Implementation which were last updated on 20/04/2019 (GJOM) and on 23/03/2019 (GJBE). Example seen are: Internal stakeholder consultation & communication meeting: appropriate actions shall be taken for the issues raised in timely manner and documented. Status: some actions pending (GJOM). Facilities – linesite, workplace, etc: to ensure adequate and necessary facilities are provided to workers at linesite, workplace etc. Status: done and on-going process (GJOM). Workers Committee: Workers committee comprising of all nationals, races, genders, work category etc shall be chosen by workers through election. Status: last election done in 29.03.2019 (GJBE). 	Complied
	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 -	The Social Management and Monitoring Plan for GJOM were last updated on 20/04/2019 (GJOM) and on 23/03/2019 (GJBE) based on review made through stakeholder consultation meeting on 13.04.2019 (GJOM) attended by 22 people.	Complied
	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	Not applicable as there is no scheme smallholders involved in the operating units.	Not applicable

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Criterior	n / Indicator	Assessment Findings	Compliance
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	The process implemented based on Sustainability Management Procedure for Consultation and Communication; SMP-GPB- 17; Rev. 02; Date: 23/02/2018. Consultation & communication done through meetings, dialogs, and engagement to both internal & external stakeholders. Any complaints or grievances recorded in Genting Plantations Complaints/Grievance Record Book.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	GJOM: Letter of Appointment as Management Representative for ISCC, RSPO and MSPO Related Matters; dated 01/01/2018. Appointed person: Mill Manager – GJOM; by VP – Processing (Sabah). Letter of Appointment as Sustainability Coordinator for ISCC, RSPO and MSPO Related Matters; dated 25/01/2019. Appointed person: Chief Clerk; by Mill Manager GJOM. GJBE:	Complied
		Letter of Appointment as Management Representative for ISCC, RSPO and MSPO Related Matters; dated 24/01/2017. Appointed person: Estate Manager – GJBE; by VP – GM - Plantation (Region 2 Sabah).	

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Criterion	/ Indicator	Assessment Findings	Compliance
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 -	GJOM & GJBE: Genting SDC Sdn Bhd: Genting Jambongan Oil Mill List of internal stakeholders updated as at 15.04.2019 and external stakeholders updated as at 15.04.2019 for GJOM and on 01.03.2019 for both internal and external stakeholders at GJBE. Latest stakeholder meeting was conducted on 13.04.2019 attended by 22 people for stakeholders within Jambongan Island. The stakeholder meeting was conducted combined with mill and estate. Meeting attended by village representatives, school teacher, supplier's representative and MPOA Officer. The outside Jambongan Island stakeholder (Region 2 Group), the meeting was conducted on 15.10.2018 attended by 35 representatives.	Complied
Criterion		complete and aviourness, which is implemented and accepted by all	facted partice
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 -	complaints and grievances, which is implemented and accepted by all e Mechanism implemented as per Whistleblower Policy; Date: 19/02/2013 under the Sustainability Management Group Policies established through specific contact person at Genting Plantation HQ office via phone or email or website form.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
6.3.2 Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	The process implemented based on Sustainability Management Procedure for Consultation and Communication; SMP-GPB- 17; Rev. 02; Date: 23/02/2018. Consultation & communication done through meetings, dialogs, engagement to both internal & external stakeholders and recorded in Genting Plantations Complaints/Grievance Record Book. Sighted latest complaints recorded in 17.07.2018 from DOE Kota Kinabalu branch. Sighted also enquiry register book with latest enquiry received by GJBE from Headmaster, SK Jambongan (enquiry ref.# 031; dated 16/8/2017) on request to pick up the preschool students early. In GJBE, the Police Officer has requested the accommodation for Community Policing program from 18- 19.05.2019 (enquiry no: #077 dated 13/05/2019).	Complied

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.

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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 -	 Established as Sustainability Management Procedure for Negotiation, Compensation and Handling Procedure; SMP-GPB-18; Rev. 03; Date: 29/12/2017. The objective of the procedure is to provide guidelines on handling issues as follow: Handling land/Boundary conflicts Compensations procedures on overplanted and underplanted land Squatter disputes 	Complied
		Negotiation will be carried out between estate management and the stakeholders. If it fails, then will consult Legal Department and etc. in Head Office. Any compensation claims will be decided by the HO top management bases on case basis and current value. If negotiation and compensation fails, HQ top management will proceed with legal action against the affected party. However, no disputes recorded since the last visit.	
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 same as above criteria 6.4.1 which includes calculating and distributing monetary or other type of compensation.	Complied



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Criterion	/ Indicator	Assessment Findings	Compliance
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 -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	Complied
Criterion			
Pay and c wages.	onditions for employees and for contract workers always m	eet at least legal or industry minimum standards and are sufficient to p	rovide decent living
6.5.1	Documentation of pay and conditions shall be available. - Major compliance -	 Mill employed local and foreign workers. All the workers are under direct employment. Only Indonesian workers as foreign worker hired in GJOM. Sampled pay slip from Feb – Apr 2019 as below: GJOM: a) Employee # E00114 (Local) b) Employee # E00070 (Indonesian) c) Employee # E0096 (Local) d) Employee # E00121 (Indonesian) e) Employee # E00122 (Indonesian) 	Complied
		GJBE: a) Employee # E01464 (Indonesian) b) Employee # E01615 (Indonesian) c) Employee # E01701 (Indonesian) d) Employee # E01690 (Indonesian) e) Employee # P00089 (Indonesian) f) Employee # E01683 (Indonesian)	
		All sampled workers achieved the minimum wage as per Minimum Wage Order 2016 for period of Feb – Apr 2019. There is no woman work in night shift at GJOM.	

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 6.5.2 Labour laws, union agreements or direct contracts of employment dealing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entilement, 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. Major compliance - Major compliance - Birployee # E00096 (Local) Employee # E00122 (Indonesian) Employee # E00122 (Indonesian) Employee # E01153 (Indonesian) Employee # E01153 (Indonesian) Employee # E01630 (Indonesian) Employee # E01633 (Indonesian) Major monorofit Employee # E01633 (Indonesian) Employee # E01633 (Indonesian) Employee # E01633 (Indonesian) Employee # E01633 (Indonesian) GIBE (Rahmat Bin Abdullah, Worker ID: E01679), VLP: RM 424.56, EPF Tambahan: RM 45.00. GIDM (Muhammad Sabri Shamsul, Worker ID: E00048), VLP: RM 424.56, EPF Tambahan: RM 45.00. GIDM (Muhammad Sabri Shamsul, Worker ID: E01295 and Work					
 employment (e.g. wörking hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available to available available to available available to available available to available available available to available available to available ava	6.5.2	Labour laws, union agreements or direct contracts of			
 a. Employee # E00170 [Indonesian] b. Employee # E00121 [Indonesian] c. Employee # E01212 [Indonesian] c. Employee # E01212 [Indonesian] c. Employee # E01212 [Indonesian] c. Employee # E01213 [Indonesian] c. Employee # E01213 [Indonesian] c. Employee # E01615 [Indonesian] c. Employee # E01615 [Indonesian] e. Employee # E01619 [Indonesian] f. Employee # E01609 [Indonesian] e. Employee # E01619 [Indonesian] f. Employee # E01619 [Indonesian] f. Employee # E01619 [Indonesian] f. Employee # E01609 [Indonesian] f. Employee # E01630 [Indonesian] g. Employee # E01630 [Indonesian] f. Employee # E01630 [Indonesian] g. Employee # E0					Major
 b. Employee # E00096 (Local) c. Employee # E00096 (Local) d. Employee # E00121 (Indonesian) e. Employee # E0122 (Indonesian) e. Employee # E0121 (Indonesian) e. Employee # E01615 (Indonesian) c. Employee # E01701 (Indonesian) d. Employee # E01701 (Indonesian) e. Employee # E01615 (Indonesian) c. Employee # E01690 (Indonesian) e. Employee # E01690 (Indonesian) e. Employee # E01633 (Indonesian) f. Employee # E01633 (Indonesian) g. There 'EPF' and 'EPF Tambahan' deduction on VLP in April 2019 pay sip where the calculation was inconsistent. Sampled below: GIBE (Rahmat Bin Abdullah, Worker ID: E01679), VLP: RM 141.52, EPF Tambahan: RM 45.00. GIOM (Siti Hawa Balqis, Workder ID: E00048), VLP: RM 442.456, EPF Tambahan: RM 45.00. GJOM (Muhammad Sabri Shamsul, Worker ID: E00048), VLP: RM 448.46, EPF Tambahan: RM 51.00. G GJOM (Muhammad Sabri Shamsul, Worker ID: E01295 and 					-
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 Major compliance - GJBE: a. Employee # E01464 (Indonesian) b. Employee # E01615 (Indonesian) c. Employee # E01701 (Indonesian) d. Employee # E01690 (Indonesian) e. Employee # E01693 (Indonesian) f. Employee # E01683 (Indonesian) 1. All the employment contract sampled are having different version which are for GJOM (version 01.08.2016) and GJBE (version 01.12.2017). 2. There 'EPF' and 'EPF Tambahan' deduction on VLP in April 2019 pay slip where the calculation was inconsistent. Sampled below: GJBE (Rahmat Bin Abdullah, Worker ID: E01679), VLP: RM 141.52, EPF Tambahan: RM 15.00. GJOM (Stit Hawa Balqis, Workder ID: E00048), VLP: RM 424.56, EPF Tambahan: RM 46.00. GJOM (Muhammad Sabri Shamsul, Worker ID: E00034), VLP: RM 448.46, EPF Tambahan: RM 448.46, EPF Tambahan: RM 51.00. 3. The piece rate workers (GJBE-Worker ID: E01295 and 					
GJBE: a. Employee # E01464 (Indonesian) b. Employee # E01615 (Indonesian) c. Employee # E01690 (Indonesian) d. Employee # E01683 (Indonesian) e. Employee # E01683 (Indonesian) f. Employee # E01683 (Indonesian) 1. All the employment contract sampled are having different version which are for GJOM (version 01.08.2016) and GJBE (version 01.12.2017). 2. There 'EPF' and 'EPF Tambahan' deduction on VLP in April 2019 pay slip where the calculation was inconsistent. Sampled below: GJBE (Rahmat Bin Abdullah, Worker ID: E01679), VLP: RM 141.52, EPF Tambahan: RM 15.00. GJOM (Stit Hawa Balqis, Workder ID: E0048), VLP: RM 424.56, EPF Tambahan: RM 46.00. GJOM (Muhammad Sabri Shamsul, Worker ID: E00034), VLP: RM 448.46, EPF Tambahan: RM 51.00. 3. The piece rate workers (GJBE-Worker ID: E01295 and		carefully to them by a management official.	e.	Employee # E00122 (Indonesian)	
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 e. Employee # P00089 (Indonesian) f. Employee # E01683 (Indonesian) f. All the employment contract sampled are having different version which are for GJOM (version 01.08.2016) and GJBE (version 01.12.2017). 2. There 'EPF' and 'EPF Tambahan' deduction on VLP in April 2019 pay slip where the calculation was inconsistent. Sampled below: GJBE (Rahmat Bin Abdullah, Worker ID: E01679), VLP: RM 141.52, EPF Tambahan: RM 15.00. GJOM (Siti Hawa Balqis, Workder ID: E00048), VLP: RM 424.56, EPF Tambahan: RM 46.00. GJOM (Muhammad Sabri Shamsul, Worker ID: E00034), VLP: RM 448.46, EPF Tambahan: RM 51.00. 3. The piece rate workers (GJBE-Worker ID: E01295 and 			с.	Employee # E01701 (Indonesian)	
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GJOM (Muhammad Sabri Shamsul, Worker ID: E00034), VLP: RM 448.46, EPF Tambahan: RM 51.00. 3. The piece rate workers (GJBE-Worker ID: E01295 and				• GJOM (Siti Hawa Balqis, Workder ID: E00048), VLP:	
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3. The piece rate workers (GJBE-Worker ID: E01295 and				E00034), VLP: RM 448.46, EPF Tambahan: RM	
				51.00.	
			3.	The piece rate workers (GJBE-Worker ID: E01295 and	
				Worker ID: E01459) did not aware of the annual leave	

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Criterion	/ Indicator	Assessment Findings	Compliance
		entitlement as per their employment contract. Therefore, in 2018, all the leaves taken are treated as absent and no annual leave taken although they were entitled it. Thus, major NC was raised.	
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 –	The mill and estates have provided housing facilities to the workers. They also supplied water tanks for the workers to store water. Water was treated in the mill treatment plant and found is clean. Interview with the housewives and workers found out that water and electricity was provided without charges. Clinic is located in the estate compound to provide medical facilities to all the workers. Crèche is provided in the mill and estate for the kids.	Complied
		Based on the result of analysis for drinking water sample taken from treated water storage tank in mill, the drinking water supplied found complied to the National Standard for Drinking Water Quality, 2 nd Version, January 2004 by Engineering Services Division, Ministry of Health Malaysia. Results available (not detected for e-coli and total coliforms) in Certificate of Analysis; Report Lab ref No: 20190409/05 ; Dated: 04/05/2019 by Dynakey Laboratories Sdn Bhd.	
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance –	Sundry shops and canteens were located in the mill. The goods and foods price list was displayed at the shop. Besides, the management has provided 3x boat trip from Jambongan Island to Paitan town for workers.	Complied

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Criterior	n / Indicator	Assessment Findings	Compliance
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	The statement published as per as per People Policy; Rev. 00; Date: 3/8/2009 sighted available in local languages recognizing freedom of association.	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	In GJOM, the latest meeting with workers' representative was done on 05/01/2019 as per "Minit Mesyuarat Pembubaran Dan Perlantikan AJK Kebajikan Pekerja Bagi Tahun 2019" attended by 8 people sighted.	Complied
		In GJBE, the latest meeting with workers' representative was done on 30/03/2019 as per "Minit Mesyuarat Tahunan Pekerja" attended by 16 people sighted.	
Criterior	n 6.7:		
Children a	are not employed or exploited.		
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Based on Workers List as of April 2019 for both mill and estates, no any children being employed or exploited. During the housing inspection visit, sighted that children are sent to school and not employed or following their parents to work.	Complied
Criterio	n 6.8:		
Any form prohibited		ion, disability, gender, sexual orientation, union membership, political a	affiliation, or age, is
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	A publicly available policy on equal opportunities as per People Policy; Rev. 00; Date: 3/8/2009 sighted and implemented accordingly.	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
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 -	No evidence of discrimination since the company employees consist of well mixed of multiracial local and foreigners.	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 -	It was demonstrated that all recruitments were fairly selected and promoted. Workers are hired based on their skills, performance and job description. This is sighted in the job application form (example is wireman from Mohamad Rizuan in 2019) and vacancy advertisement (in 2017: Workshop mechanical-criteria are disciplined and experience in workshop).	Complied
Criterio	n 6.9:		
There is	no harassment or abuse in the work place, and reproductive		
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 -	Genting Plantations Berhad has implemented a Sexual Harassment Policy dated 3/8/2009 signed by Chief Operating Officer. There is also 'Guidelines on Prevention and Eradication of Sexual Harrassment at the Workplace, version 0 (2010) by Sustainability Department.	Complied
		Training on sexual harassment in workplace has been given to the workers on 27/4/2019 for 29 workers.	
		In GJOM, the latest meeting with woman association was done on 22/1/2019 as per "Minit Mesyuarat Persatuan Pembubaran Dan Perlantikan AJK Baru Persatuan Kebajikan Wanita Dan Kanak-Kanak Bagi Tahun 2019" attended by female workers sighted. In GJBE, the latest meeting with workers' representative was done on 30/03/2019 as per "Minit Mesyuarat Tahunan Pekerja" attended by 16 people sighted.	

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Criterion	/ Indicator	Assessment Findings	Compliance
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 -	Genting Plantations Berhad has implemented a Social Policy (Incorporating the Labour and Human Rights requirements) dated 22/6/2015. In the policy statement, it mentioned that reproductive rights are protected. Briefing on policies on 27/4/2019 for 29 workers (GJOM) and on 08/01/2019 & 13/03/2019 attended by 367 people (GJBE). Attendant list and training material is sighted.	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 -	The process implemented as per relevant policies and procedure of grievance incorporated in the Social Policy above. There is also 'Guidelines on Prevention and Eradication of Sexual Harassment at the Workplace, version 0 (2010) by Sustainability Department.	Complied
Criterion Growers a	6.10: and mills deal fairly and transparently with smallholders and	other local husinesses	
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	The mill has displayed the FFB pricing based on MPOB guideline for April 2019 (RM 297 for OER 18.50%) at weighbridge area. The pricing was displayed in front of the weighbridge counter.	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 -	Pricing mechanism was documented as 'Polisi Perolehan Tandan Buah Sawit' between Genting SDC Sdn Bhd and Pembekal Tandan Buah Sawit (TBS) by SVP Marketing-Palm Products on 11 May 2017 and 'Addendum to Outside FFB Purchase Policy' dated 28 March 2019 which is available in dual language English & BM. The policy was briefed and issued to the smallholders and FFB suppliers on through and 'Addendum to Outside FFB Purchase Policy' dated 28 March 2019 and signed on 10/05/2019. The policy also described the Price Formula consist of OER offered, MPOB monthly average CPO Price, MPOB Cess, Processing Fee and etc.	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 -	The mill has displayed the FFB pricing based on MPOB guideline for April 2019 (RM 297 for OER 18.50%) at weighbridge area. The pricing was displayed in front of the weighbridge counter.	Complied

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Criterior	n / Indicator	Assessment Findings	Compliance
5.10.4 Criterion	Agreed payments shall be made in a timely manner. - Minor compliance - 6.11:	Pricing mechanism was documented as 'Polisi Perolehan Tandan Buah Sawit' between Genting SDC Sdn Bhd and Pembekal Tandan Buah Sawit (TBS) by SVP Marketing-Palm Products on 11 May 2017 and 'Addendum to Outside FFB Purchase Policy' dated 28 March 2019 which is available in dual language English & BM. The policy was briefed and issued to the smallholders and FFB suppliers on through and 'Addendum to Outside FFB Purchase Policy' dated 28 March 2019 and signed on 10/05/2019. The policy also described the Price Formula consist of OER offered, MPOB monthly average CPO Price, MPOB Cess, Processing Fee and etc.	Complied
	and millers contribute to local sustainable development when	e appropriate.	
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	 Few contributions made by company amongst all sighted were as following: Transporting water from GJOM to Kg Bahanan on 01.03.2019, (receipt no: 32567) Transporting water from GJOM to Kg Hujung on 02.03.2019, (receipt no: 32568) Transporting water from GJOM to Kg Melalin on 09.03.2019, (receipt no: 32574) School bags distribution to school students at GJBE on February 2019. Clean water distribution to villagers, clinic, school and police station on May 2019. 	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.	Indicator is not applicable as there is no scheme smallholder involved in the operating units.	Not applicable

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Criterio	n / Indicator	Assessment Findings	Compliance
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	Genting Plantations Berhad has implemented a Social Policy (Incorporating the Labour and Human Rights requirements) dated 22/6/2015. In the policy statement, the management has committed not to use any forced labour or trafficked labour. The workers had signed a request for passport keeping in office by employer for safety reason, avoid from broken and for the passport renewal monitoring. The workers willingly to surrender the passport to the employer and can obtain the passport at any time whenever requested.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	It was demonstrated that no contract substitution has occurred within all Genting sites.	Complied
6.12.3	 Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. Major compliance - 	Specific labour policies i.e. People Policy and Social Policy evidently implemented where migrant workers are treated equally as per the local workers.	Complied
Criterio Growers	n 6.13: 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 implemented a Social Policy (Incorporating the Labour and Human Rights requirements) dated 22/6/2015. They are respected and supported the Universal Declaration of Human Rights. Briefing on policies was conducted regularly during worker assembly and displayed on notice boards at offices.	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.	There is no HUMANA school in Jambongan Island. Foreign worker's children below age of school were sent to stay at Creche Ayah if the mother is working. If the children are within the school age, they were sent back to their hometown.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance		
rincipl	e 7: Responsible development of new plantings (if applicab	le)			
Criterion 7.1: A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operat					
	ng existing ones, and the results incorporated into planning, i		igs or operations		
7.1.1	An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders, shall be documented. - Major compliance -	Full report on the determination and management of HCV and social and environmental impact assessment within the new planting sites of Genting Jambongan Estate, Jambongan Island, Sabah, author: Dr. Yap Son Kheong (SK Yap Forestry and Landscape Advisory) dated 4- 8 August 2014 is available.	Complied		
		A comprehensive and independent Social and Environmental Impact Assessment (SEIA) and High Conservation Value (HCV) Assessment for on-site assessment done from 4-8 August 2014 which included participation internal and external stakeholders were completed by an assessment team from S.K. Yap Forestry and Landscape Advisory Services, lead by Dr. Yap Son Kheong. The report was finalized on October 2014.			
		For the community socio-economic investigation, consultations were conducted with the community leaders of the village nearest to the proposed site by the social assessor and partly assisted by the Team Leader. The consultation process was conducted through open house discussions, focus group discussions, administration of village and formal stakeholders meeting. Relevant stakeholders that were engaged during the consultation process included affected local communities, and Government representatives (PKR, Native Chiefs), all of which provided valuable information regarding the nature and extent of potential environmental and social impacts associated with			

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Criterio	n / Indicator	Assessment Findings	Compliance
7.1.2	Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts. - Minor compliance -	 The specific objectives pursued during the stakeholder consultation were: Provision of information to stakeholders; Gathering of information on various environmental and social aspects; Inputs from stakeholders on the planned project, including its scale, timing, ways to reduce and mitigate its potential negative impacts and ways to enhance its potential positive impacts. A stakeholder meeting was organised by GJBE at its office, on the 7th August, 2014 with the 6 village heads but only 5 representatives (headman and JKKK) from 2 villages (Bahanan, Hujung) attended due to unpredictable weather conditions surrounding the island. Consultations had, however, been conducted in Kg. Limau-Limau, Kg, Malalin and Kg. Bahanan the previous day. The study team members and senior staff members of GJBE both from Jambongan and its Sandakan head office were involved in the discussion. The report has provided recommendation to mitigate identified potential negative impacts. Among the suggestion are: Providing information and fair participation. Consultation and collaboration with other stakeholders. Capacity building and employment opportunities. 	Complied
7.1.3	Where the development includes an outgrower scheme, the impacts of the scheme and the implications of the way it is managed shall be given particular attention. - Minor compliance -	1/11/1/229 dated The new planting development doesn't include any outgrower scheme.	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
		No affected outgrower scheme at Genting Jambongan Certification Unit.	
Criterio	on 7.2:		
Soil sur operatio		ng in the establishment of new plantings, and the results are incorpor-	ated into plans
7.2.1	Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation shall be available and taken into account in plans and operations. - Major compliance -	 Soil suitability map was done by Genting Plantation Research Centre (GPRC) and available during the audit. The type of soil for new planting area were: 1. Brantian series 2. Sook series 3. Dalit series 4. Maliau series Last soil sampling analysis was carried out on 24/9/2018. Refer report no. SR21/2018 dated 25/10/2018. 	Complied
7.2.2	Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available and taken into account in plans and operations. - Minor compliance -	The topographic information including the slope map was done accordingly for GJBE including new planting area. The latest slope map dated 30/1/2019 by GPRC was sighted. Terrain classification as follow: a) 0-2°:38.73% b) 2-6°: 45.82% c) 6-12°: 13.54% d) 12-20°: 1.90% e) 20-25°: 0.01% f) >25°: 0.0%	Complied

New plantings since November 2005 have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.

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Criterie	on / Indicator	Assessment Findings	Compliance
7.3.1	There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2). - Major compliance -	A comprehensive and independent High Conservation Value (HCV) Assessment for on-site assessment done from 4-8 August 2014 which included participation internal and external stakeholders were completed by an assessment team from S.K. Yap Forestry and Landscape Advisory Services, lead by Dr. Yap Son Kheong. The report was finalized on October 2014. There was only one HCV area identified in the proposed new planting area, i.e. HCV 4.1 which is a stream utilized by the villagers at Kg Limau Limau which flows from Block E and Sg Ginday in Block D. Based on the report, it was confirmed that no primary forest or peat are located in any of these land parcels.	Complied
7.3.2	A comprehensive HCV assessment, including stakeholder consultation, shall be conducted prior to any conversion or new planting. This shall include a land use change analysis to determine changes to the vegetation since November 2005. This analysis shall be used, with proxies, to indicate changes to HCV status. - Major compliance -	As described in the SEIA/HCV reports prepared by the assessment team, preliminary assessment of the presence of HCV sites within the sites was done by reviewing published information and discussion with the estate management. Published data of protected sites, endangered, rare and threatened species and the various enactments were used wherever appropriate. Documentation review on the planted areas including the previous HCV study, forest reserve and the villages on the island was done prior to the field study. There was a previous HCV report of the Genting Jambongan Estate which formed the baseline data for the present study. The stakeholder consultations and field investigation was conducted from 4 to 8 August 2014 by the 3 member assessment team for HCV.	Complied
		A stakeholder meeting was organised by GJBE at its office, on the 7th August, 2014 with the 6 village heads but only 5 representatives (headman and JKKK) from 2 villages (Bahanan, Hujung) attended due to unpredictable weather conditions surrounding the island. Consultations had, however, been conducted in Kg. Limau-Limau, Kg, Malalin and Kg. Bahanan the previous day. The study team	

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Criteri	on / Indicator	Assessment Findings	Compliance
		members and senior staff members of GJBE both from Jambongan and its Sandakan head office were involved in the discussion.	
		Genting Plantations contracted PT Earthline to provide 2006 and 2010 satellite imagery and do landcover mapping of their existing Jambongan estate (3,510 ha) in Sabah, Malaysia, with landcover grouped under 4 coefficient. PT Earthline produced a report entitled "SPOT5 Satellite Imagery and Landcover Mapping of Jambongan Estate, Genting Plantations" (herewith referred to as the LUC report) dated September 2014. As stated in the land use change (LUC) report from PT Earthline, this project involved the collection of 10 m multispectral SPOT5 imagery dating April 2006 and 15 m Landsat7 imagery, dating October 2010. Digital classification and editing was carried out based on this imagery. In 2006, most of the Jambongan estate consisted of cleared areas, with old and young shrubs mostly in the West and grassland mainly in the East. No secondary forest could be identified in this imagery. In 2010, most of the estate was covered with young shrubs, with some old shrubs. In the West and South East, cleared areas are visible. No secondary forest or grassland could be identified in this imagery. The Jambongan estate is entirely grouped under coefficient 0.0 in 2006 and in 2010.	
7.3.3	Dates of land preparation and commencement shall be recorded. - Minor compliance -	Dates of land preparation and commencement of planting was recorded and progress of planting is reported by parcel. Land preparation was done on September 2016 after the completion of 30 days NPP Notification at the end of the month of July 2016 (verification statement date: 16 th June 2016). Planting was started in December 2016.	Complied
7.3.4	An action plan shall be developed that describes operational actions consequent to the findings of the HCV	Action plan developed describes operational actions consequent to the findings of the HCV assessment, and references the grower's	Complied

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erion / Indicator	Assessment Findings		Compliance
assessment, and that references the grower's relevant operational procedures (see Criterion 5.2).		cedures included in the management and mary of action plan as per	
- Major compliance -	HCV	Management plan	
	4.1 Watershed Protection (Sg Limau and Sg Ginday)	Establish buffer zone as per Sabah Water Resource Enactment 1998. With the proposed riparian reserve of 5 m and 20 m width along each river bank. Sg Limau, the approx. total area is 1.55 hectares. Sg Ginday, the approx. total area is 0.93 hectares. To map important water resource areas, and to place signboards, to provide protection/buffer to the location.	
		To inform stakeholders on importance of watershed protection.	
		To install poles in red and white paint to show distance of buffer zone.	
		To include the buffer zone and potential erosion area in the map	
		Land or vegetation cover in the high pote erosion area should be well maintained should be improved if necessary.	
		To avoid any weeding or manuring activitie palms within the buffer zone.	•



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Criterion / Indicator		Assessment Findings		Compliance	
			To place signages informing stakeholder HCV area	s on	
			To socialize the importance of conservation buffer zone to sprayers and general worke		
7.3.5	Areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2).		ected communities within the new planting HCV 4.1 identified within the area.	(Complied
	- Minor compliance -				
Criteri Extensiv	- Minor compliance -	including peat, is avoided.			
	- Minor compliance -		soil categorised as marginal and fragile soil		Complied

No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.

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Criterion	/ Indicator	Assessment Findings	Compliance
u p d a b	Evidence shall be available that affected local peoples understand they have the right to say 'no' to operations blanned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the grower/miller is signed and ratified by these local peoples. • Major compliance -	The consultations and meetings with stakeholder in all four villagers indicated that they were not aware of the proposed expansion project of GJBE as the management of GJBE had yet to confirm the status of the land. Therefore, GJBE has made 'Mesyuarat Pelan Pembangunan & Pengembangan Genting Jambongan' on 26-28 November 2014 which involved Kg Hujung, Kg Melalin, Kg Bahanan and Kg Limau- Limau. However, all the planted area is not affected the villager's land and it's all belong to Genting Plantations Berhad. Among the issues raised are: 1. Electricity supply request 2. Clean water supply request 3. Job opportunity to the villagers 4. Land development 5. Road accessibility 6. Joint venture programme for oil palm plantation	Complied
		No new planting were establish on the local's people land.	

Criterion 7.6:

Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.

7.6.1	Documented identification and assessment of demonstrable legal, customary and user rights shall be available. - Major compliance -	There is no native customary rights land within the GJBE. All land has valid land titles, therefore this requirement is not applicable.	Complied
7.6.2	A system for identifying people entitled to compensation shall be in place. - Major compliance -	There is no native customary rights land within the GJBE. All land has valid land titles, therefore this requirement is not applicable.	Complied

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Criteri	on / Indicator	Assessment Findings	Compliance
7.6.3	A system for calculating and distributing fair compensation (monetary or otherwise) shall be in place. - Major compliance -	There is no native customary rights land within the GJBE. All land has valid land titles, therefore this requirement is not applicable.	Complied
7.6.4	Communities that have lost access and rights to land for plantation expansion shall be given opportunities to benefit from plantation development. - Minor compliance -	There is no native customary rights land within the GJBE. All land has valid land titles, therefore this requirement is not applicable.	Complied
7.6.5	The process and outcome of any compensation claims shall be documented and made publicly available. - Minor compliance -	There is no native customary rights land within the GJBE. All land has valid land titles, therefore this requirement is not applicable.	Complied
7.6.6	Evidence shall be available that the affected communities and rights holders have access to information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	There is no native customary rights land within the GJBE. All land has valid land titles, therefore this requirement is not applicable.	Complied
Criteri	on 7.7:		
No use	of fire in the preparation of new plantings other than in specif	ic situations, as identified in the ASEAN guidelines or other regional be	st practice.
7.7.1	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 -	No burning policy is available and signed by Mr Yong Chee Kong (President & Chief Operating Officer) dated 10 August 2011 and no evidence of open burning was observed during onsite visit to the line site as well as the areas surrounding the office.	Complied
		Prohibition use of fire during land preparation stage detailed out under generic agreement for land preparation. As stipulated in the contract ref:GJBE/LSW/NP/2016/01 dated 1/9/16 between Genting Jambongan Estate and contractor, Low Soew Weng Development; Para 2.3 – compliance with RSPO/MSPO/ISCC requirements related company policies (iv) Zero Burning Policy under Schedule 2; scope	

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Criterio	on / Indicator	Assessment Findings	Compliance
		of works/work order guidelines. No use of fire for land preparation during new planting and verified during site review at Genting Jambongan Estate. Further detailed under schedule 1 for scope of new development work order – Land preparation from jungle land to planting of oil palm. Only mechanized operation is allowed during land preparation period.	
7.7.2	In exceptional cases where fire has to be used for preparing land for planting, 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 -	No use of fire for land preparation during new development phases and verified during site review at Genting Jambongan Estate. No use of fire for land preparation during new development phases and verified during site review at Genting Jambongan Estate.	Complied
Criterio	on 7.8:		
	ntation developments are designed to minimise net greenhou	ise gas emissions.	
7.8.1	The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated. - Major compliance -	The company had commissioned Malaysian Environmental Consultants Sdn. Bhd. to carry out an assessment on Carbon Stock on Various Parcels in the Genting Jambongan Estate (Sabah). On site assessment was carried out on 18 th to 23 rd May 2015. Report dated August 2015 was verified. The results of the carbon stock assessment were incorporated into the company's management plan entitled "Summary of Management & Mitigation Plans: Carbon Stock & GHG Emissions". No high carbon stock area as justified under Land Use Change Analysis (LUCA). Net emission per hectare is recorded at -10,354 tCO ₂ eq/ha.	Complied

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Criteri	on / Indicator	Assessment Findings	Compliance			
7.8.2	There shall be a plan to minimise net GHG emissions which takes into account avoidance of land areas with high carbon stocks and/or sequestration options. - Minor compliance -	Plan to minimize net GHG emission is incorporated in the Summary of Management and Management Plan for Carbon Stocks and GHG Emission dated January 2016. The established mitigation plan has covered the land clearing activities (before and during planting), fertilizers (during maintenance) and fuel consumption (operational stages). Planting of oil palm is part of sequestration option as oil palm tree is a perennial crop and can constantly maintain and develop their root and woody biomass and associated carbon while providing vegetative cover for soils.	Complied			
Criteri Growers	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.					

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Criterion / Indicator	Assessment Findings	Compliance
 8.1.1 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. As a minimum, these shall include, but are not necessarily be limited to: 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); Optimising the yield of the supply base. Major compliance - 	 Genting Jambongan Oil Mill and supply base had established continuous improvement plan, for example: 1. To maximizing recycling and minimizing waste or by-products generation 2. To improve interior and exterior of workers quarters 3. Dry cleaning at Jambongan Oil Mill 4. Installation of Electrostatic Precipitator 5. Minimize soil erosion 6. Optimizing the yield production 	Complied

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Appendix B: Approved Time Bound Plan

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certificati on	Status as of 23 July 2018	Any unresolved non- compliances
1	Genting	Genting Sri Gading Estate,	Supply base for	Dec,2014	Certified	None
2	Plantations (WM) Sdn Bhd	Genting Sungei Rayat Estate,	Genting Ayer Item Oil Mill,			
3	& Setiamas Sdn Bhd(100%)for	Genting Kulai Besar Estate,	Johor, Malaysia			
4	estates	Genting Tanah Merah Estate,		Dec,2015		
5	Genting Oil Mill Sdn Bhd (100%) for mill	Genting Tebong Estate,		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	Genting Tanjung Estate, Sabah,Malaysia	Supply base for Genting Tanjung	Aug,2016	Certified	None
9	Bahagia Sdn Bhd (100%) for estates	Genting Tenegang Estate, Sabah,Malaysia	Oil Mill, 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	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah	Oct 2018		The Remediation and Compensation
14	Bahagia Sdn Bhd (100%) for estates	Genting Permai Estate, Sabah, Malaysia	Oil Mill, Sabah, Malaysia			Procedures is pending for Genting Kencana Estate.
15		Genting Kencana Estate, Sabah, Malaysia				LUCA has been passed. Concept Note (CN) for Remediation and Compensation has been submitted to RSPO.
16	Genting SDC Sdn Bhd (Genting Jambongan Estate, Sabah,Malaysia	Supply base for Genting Jambongan 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 certificati on	Status as of 23 July 2018	Any unresolved non- compliances
	100%) for estate and mill		Mill,Sabah,Malay sia			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 Mengkatip 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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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certificati on	Status as of 23 July 2018	Any unresolved non- compliances
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	AAC 1 & 2				NPP In Progress.
	Cemerlang (70%)	AAC 3 & 4				HCV report being reviewed at HCVRN.
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.

*Oil Mill planned for construction

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



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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

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Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2018 for Genting Jambongan Palm 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 Jambongan Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
СРО	0.13
РК	0.13

Production	t/yr
FFB Process	56,728.1
CPO Produced	12,953.56
PK Produced	2,373.6

Extraction	%
OER	22.83
KER	4.18

Land Use	На
OP Planted Area	3,893.27
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	22.83
Tot	tal 3,916.1

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO₂e	tCO2 e / FFB	tCO₂e	tCO₂ e / FFB	tCO₂e	tCO2 e / FFB	tCO₂e	tCO2 e / FFB
Emission								
Land Conversion	27,541.64	0.5	0	0	0	0	27,541.64	0.5
CO ₂ Emission from fertilizer	3,417.78	0.06	0	0	0	0	3,417.78	0.06
NO ₂ Emmision	3,970.91	0.07	0	0	0	0	3,970.91	0.07
Fuel Consumption	1,373.83	0.02	0	0	0	0	1,373.83	0.02
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-36,224.67	-0.66	0	0	0	0	-36,224.67	-0.66
Conservation Sequestration	-208.25	0	0	0	0	0	-208.25	0
Total	-128.76	0	0	0	0	0	-128.76	0

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0	0
Fuel Consumtion	1,259.73	0.02
Grid Electricity Utilisation	0	0
Credit		
Export of Grid Electricity	-33.64	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	1,226.09	0.02

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	303.79
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

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

POME Diverted to Anaerobic Digestion:		
Divert to anaerobic pond (%)	0	
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 Jambongan Oil Mill takes legal ownership and physically handles its RSPO certified oil palm products i.e. CPO and PK.	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.	GJOM was not a trading company. Therefore, this requirement was not applicable.	N/A	
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.	Company has registered in palmTrace system as follows: Members ID – Genting Jambongan Oil Mill : RSPO_PO1000003777 Member category : Oil Mill Genting Plantations Bhd held RSPO membership number: 1- 0086-06-000-00 since 14 November 2006.	Yes	
5.1.4	Processing aids do not need to be included within an organization's scope of certification.	Processing aids are not used in the milling process.	Yes	
5.2 Su	pply chain model			



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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.	The FFB suppliers are of RSPO certified estates which consists of Genting Jambongan certification unit and declassification of the CPO or PK was done in accordance to the correct order.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	GJOM will be certified with Mass Balance and the sales of product were MB or conventional.	Yes
5.3. De	ocumented 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: Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	Genting Jambongan oil Mill Model: Mass Balance. The management has established the SOP for Supply Chain, Traceability and Mass Balance (Mill), SMP-GPB-23, Revision:07, Dated 24/08/2018 which covered unique running batch number, supply chain model (MB), training, persons responsible, registration and reporting requirements, RSPO stamps (MB), authorization, delivery/goods received and flowchart on overview of traceability, mass balance and book keeping procedure.	Yes
	• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	 Among the records included in the procedures are: Weighbridge tickets Delivery/Goods Received Advice Dispatch of CPO/PK – weighbridge ticket, delivery order, shipping document Daily production report Record and balance All the records were found to be up-to-date. 	Yes
	• 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.	Addressed in the SOP for Supply Chain and Traceability. The assigned persons are assistant mill engineer or chief clrek. Based on interview, the person in-charge was able to demonstrate the implementation of their procedures in accordance to the standard requirements.	Yes

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5.3.2	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	Internal audit procedure (SMP-GPB-03), Revision:04 dated 25/5/2018 was established. The internal audit was conducted on 15/4/2019. From the report, there were 3 major non-conformities raised. All the major NCs were closed on 6/5/2019. The internal audit was conducted on 15/4/2019. From the report, there were 3 major non-conformities raised. All the major NCs were closed on 6/5/2019.	Yes
5.4. P	urchasing and goods in		
5.4.1	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	When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill.	Yes
	 form: 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; 	 E.g. of information available in the FFB Despatch Advice was as follows: FFB despatch advice no. Estate's names Date & time of despatch Field No. No. of bunches Vehicle no. RSPO certificate number Supply Chain model 	
	 Supply Chain certificate number of the seller; A unique identification number 	E.g. of information available in the mill's weighbridge tickets was as follows:	
		 Delivery/Good Received Advice no.: Name of estates Field No. Name of driver 	

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•	Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil	 Vehicle no. Date & time in/out Net weight The information was available in various documents such as FFB despatch advice and Delivery/Goods Received Advice 	Yes
	palm products (for example, delivery notes, shipping documents and specification documentation).	(weighbridge tickets).	
•	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	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit.	Yes
	Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.	Genting Jambongan Oil Mill have system to verify at the weighbridge, all crop from supplying estate and non-certified smallholder. Sampled of ticket for as following:	
		Genting Jambongan Estate Date: 1/4/2019 Ticket No: FFB19002214W Block No: P0415-JBD2 Tonnage:5420kg Transporter: Internal (Tractor)	
		Once the GJOM and supply base certified with RSPO, all the ticket number will be stamp as RSPO certified FFB (include RSPO supply chain certificate no, supply base, validity period)	
•	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.	GJOM only received FFB from the estate. Hence, this clause was not applicable.	Yes

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5.4.2	 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. The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents. 	GJOM only received FFB from the estate. Hence, this clause was not applicable. The management has established the SOP for Supply Chain, Traceability and Mass Balance (Mill), SMP-GPB-23, Revision:07, Dated 24/08/2018. The procedure described on the mechanism for handling non-conforming oil palm products and/or documents.	Yes
5.5. Ou	utsourcing activities		
5.5.1	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. 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).	The agreement between Genting SDC Sdn Bhd and Hai Heng Enterprise Sdn Bhd, dated 1/5/2019 for transport CPO and PK from Genting Jambongan Oil Mill to the port or refineries was sighted. The transporter shall provide the necessary tug boat/s and oil barge/s.	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;	There is no outsourced process within Genting Jambongan Oil Mill, hence this requirement is not applicable.	N/A
	b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable	There is no outsourced process within Genting Jambongan Oil Mill, hence this requirement is not applicable.	N/A

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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.c. The site has a documented control system with explicit procedures for		
c The site has a documented control system with explicit procedures for		
the outsourced process which is communicated to the relevant contractor.	There is no outsourced process within Genting Jambongan Oil Mill, hence this requirement is not applicable.	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.	There is no outsourced process within Genting Jambongan Oil Mill, hence this requirement is not applicable.	N/A
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.	There is no outsourced process within Genting Jambongan Oil Mill, hence this requirement is not applicable.	N/A
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.	There is no outsourced process within Genting Jambongan Oil Mill, hence this requirement is not applicable.	N/A
es and goods out		
 The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form. 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 	GJOM yet to be certified. No sales of RSPO certified product	Yes
 model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); The quantity of the products delivered; 		
T f d o T T	contractor. 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. 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. The site shall at its next audit inform its CB of the names and contact etails of any new contractor used for the processing or physical handling f RSPO certified oil palm products. S and goods out The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form. 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);	contractor.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.There is no outsourced process within Genting Jambongan Oil Mill, hence this requirement is not applicable.he site shall record the names and contact details of all contractors used or the processing or physical handling of RSPO certified oil palm products.There is no outsourced process within Genting Jambongan Oil Mill, hence this requirement is not applicable.he site shall at its next audit inform its CB of the names and contact etails of any new contractor used for the processing or physical handling f RSPO certified oil palm products.There is no outsourced process within Genting Jambongan Oil Mill, hence this requirement is not applicable.s and goods outThere is no outsourced process within Genting Jambongan Oil Mill, hence this requirement is not applicable.he supplying site shall ensure that the following minimum information or RSPO certified products is made available in document form. The name and address of the buyer; The name and address of the seller; 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);GJOM yet to be certified. No sales of RSPO certified product

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-			
	Any related transport documentation;		
	 Supply chain certificate number of the seller; 		
	A unique identification number		
	• 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).	GJOM yet to be certified. No sales of RSPO certified product	Yes
	• 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.	GJOM yet to be certified. No sales of RSPO certified product	Yes
5.7. Re	gistration of transactions		
5.7.1	 Supply chain actors who: are mills, traders, crushers and refineries and; take legal ownership and/or physically handle RSPO Ceritified 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. 	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 Jambongan Oil Mill : RSPO_PO1000003777 Member category : Oil Mill Genting Plantations Bhd held RSPO membership number: 1- 0086-06-000-00 since 14 November 2006.	Yes
5.7.2	 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the 	GJOM yet to be certified. No sales of RSPO certified product	Yes

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	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.		
	• 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.	GJOM yet to be certified. No sales of RSPO certified product	Yes
	• Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.	GJOM yet to be certified. No sales of RSPO certified product	Yes
	Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.	GJOM yet to be certified. No sales of RSPO certified product	Yes
5.8. Ti	raining	· · · ·	
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.	Training schedule for 2019 was available. Training on supply chain is planned to be conducted in March 19 and number of targeted trainees is four staff, which basically from the weighbridge and administration clerks.	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.	The last training for SCCS was conducted on 16/3/2019 attended by 3 participants from weighbridge, office and general clerks.	Yes
5.9. R	ecord 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.	 Among the relevant records identified by the mill are: Estate's FFB Dispatch Advice (for estates without weighbridge) 	Yes

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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.	 Authorization form Mass Balance Worksheet – monthly input Local Sales Delivery Advice (LSDA) Incoming FFB Records (log book) Outgoing CPO Records (log book) Outgoing PK Records (log book) The retention period to maintain the records and documents related to supply chain is addressed in "List of Operational, Environmental, Social, Safety and Health Records" [SMP-GPB-02-F01-01, dated 2/9/2014]. 	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.	Not applicable since GJOM was a palm oil mill which products were CPO and PK.	N/A
5.10. C	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 derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Conversion factor of CPO and PK production is depending on the actual OER and KER.	Yes
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.	Yes
5.11. C	laims		



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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.	GJOM yet to be certified. No sales of RSPO certified product	Yes
Genera	al 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.	GJOM yet to be certified. No sales of RSPO certified product	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.	Not applicable as no off-product claim made by GJOM as to date. GJOM yet to be certified. No sales of RSPO certified product	N/A
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.	Not applicable as no off-product claim made by GJOM as to date. GJOM yet to be certified. No sales of RSPO certified product	N/A
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.	Not applicable as no off-product claim made by GJOM as to date. GJOM yet to be certified. No sales of RSPO certified product	N/A



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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.	No evidence of RSPO corporate logo used, GJOM yet to be certified with RSPO.	N/A
Busin	ess 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.	GJOM yet to be certified with RSPO.	N/A
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.	GJOM yet to be certified with RSPO.	N/A
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:	GJOM was not under distributor or wholesaler category. Thus, this requirement is not applicable.	
	 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. 		
5.4	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	GJOM was 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.	N/A

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	 not be labelled as certified or sold in such a way that implies RSPO certification. 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. 		
Busin	ess to consumer communication		
6.1	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.	No business to consumer communication on product specific claim made GJOM since GJOM yet to be certified with RSPO. GJOM only producing crude and unfinished product. This is not applicable for POM.	N/A
6.2	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.	No business to consumer communication on product specific claim made GJOM since GJOM yet to be certified with RSPO. GJOM only producing crude and unfinished product. This is not applicable for POM.	N/A
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made GJOM since GJOM yet to be certified with RSPO. GJOM only producing crude and unfinished product. This is not applicable for POM.	N/A
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made GJOM since GJOM yet to be certified with RSPO. GJOM only producing crude and unfinished product. This is not applicable for POM.	N/A
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made GJOM since GJOM yet to be certified with RSPO. GJOM only producing crude and unfinished product. This is not applicable for POM.	N/A

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	95% or above of the oil palm content must be RSPO MB-certified.	GJOM was producing crude palm products	Yes
Minim	um Mass Balance content (MB)		
MODU	ILE B – MASS BALANCE SPECIFIC RULES		
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 GJOM since GJOM yet to be certified with RSPO. GJOM only producing crude and unfinished product. This is not applicable for POM.	N/A
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 GJOM since GJOM yet to be certified with RSPO. GJOM only producing crude and unfinished product. This is not applicable for POM.	N/A
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 GJOM since GJOM yet to be certified with RSPO. GJOM only producing crude and unfinished product. This is not applicable for POM.	N/A

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Labelli	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 requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	GJOM was producing crude palm products	Yes
	 Members are allowed to use the RSPO label in one of the following ways: 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). 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. 	GJOM was producing crude palm product and does not involved in any labelling of end product	Yes
Messa	ging (MB)		
	Messaging ALLOWED in storytelling in product-related communications includes:	GJOM was producing crude palm product and does not involved in any labelling of end product	Yes

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 [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. 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. 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. Messaging NOT ALLOWED in storytelling in storytelling in	GJOM was producing crude palm product and does not involved in any labelling of end product	
communications: Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.		Yes
MODULE C – PARTIAL PRODUCT CLAIMS		
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:	GJOM was producing crude palm product and does not involved in any labelling of end product	Yes
 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'. 		

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	• 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.		
MODU	LE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES		
	Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:	GJOM was producing crude palm product and does not involved in any labelling of end product	N/A
	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		
	Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made: 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	GJOM was producing crude palm product and does not involved in any labelling of end product	N/A
5.12. 0	Complaints	· ·	
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	The procedure for complaints (Complaints and grievances procedure, SMP-GPB-19, Rev:02, dated 5/9/14) was established.	Yes
5.13. N	lanagement Review		
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	The 1 st management review for RSPO SCCS Genting Jambongan Oil Mill and Genting Jambongan Estate was conducted on 6/5/2019. This meeting was attended by Vice President- Plantations, Vice President-Processing, Estate Manager, Sr. Assistant Manager In-charge, Manager-HRAD, Manager- Sustainability Department, Safety officer and executive- sustainability department.	Yes

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5.13.2	 The input to management review shall include information on: 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. 	From the report, all the input agenda such as 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 and recommendations for improvement were discuss during the meeting.	Yes
5.13.3	 The output from the management review shall include any decisions and actions related to: Improvement of the effectiveness of the management system and its processes. 	From the report, all the output agenda such as Improvement of the effectiveness of the management system and its processes and Resource needs were discuss accordingly during the meeting.	Yes
	Resource needs.		



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

Requirements	Compliance
E.1 Definition	
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 3 rd 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 Jambongan Oil Mill receives and process both certified and noncertified FFB. 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.
E.2 Explanation	
E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall 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 shall 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 were recorded in this public summary report.
E.2.2 The mill shall 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). Members ID – Genting Jambongan Oil Mill : RSPO_PO1000003777 Member category : Oil Mill Genting Plantations Bhd held RSPO membership number: 1-0086-06-000-00 since 14
E.3 Documented procedures	November 2006.
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E.3.1 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:a) Complete and up to date procedures covering the implementation of all the elements in these requirements;	Balance (Mill), SMP-GPB-23, Revision:07, Dated 24/08/2018 which covered unique running batch number, supply chain model (MB), training, persons responsible, registration and reporting requirements, RSPO stamps (MB), authorization, delivery/goods received and flowchart on overview of traceability, mass balance and book keeping procedure.
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.	implementation RSPO Supply Chain Certification, for example: Mill manager, assistant Mill Manager, weighbridge operator, chief clerk.
	Roles and responsibility for RSPO Supply Chain team were clearly defined in the appointment letter.
	The appointment letter from the Mill Manager dated 25/1/2019 mentioned that Account Clerk as a person in-charge for supply chain at Genting Jambongan Oil Mill.
E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	The management has established the SOP for Supply Chain, Traceability and Mass Balance (Mill), SMP-GPB-23, Revision:04, Dated 21/11/2014 which covered unique running batch number, supply chain model (MB), training, persons responsible, registration and reporting requirements, RSPO stamps (MB), authorization, delivery/goods received and flowchart on overview of traceability, mass balance and book keeping procedure.
E.4 Purchasing and goods in	
E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.	GJOM will be certified with Module E: MB. Daily records were prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and noncertified FFB.
E.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	Based on interview with person in-charge, they were aware of this procedure.
E.5 Record keeping	



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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.	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and noncertified FFB.
(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 by RSPO.	Computerized system in place. However, GJOM yet to be certified.
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.(ie product can be sold before it is in stock.)	Computerized system in place. However, GJOM yet to be certified.
E.5.2 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement	The Mill aware that only positive stock can be delivered.

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Supply Chain Declaration

A. Mo	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	May 2018	N/A	N/A	N/A	
2	June 2018	N/A	N/A	N/A	
3	July 2018	N/A	N/A	N/A	
4	August 2018	N/A	N/A	N/A	
5	September 2018	N/A	N/A	N/A	
6	October 2018	N/A	N/A	N/A	
7	November 2018	N/A	N/A	N/A	
8	December 2018	N/A	N/A	N/A	
9	January 2019	N/A	N/A	N/A	
10	February 2019	N/A	N/A	N/A	
11	March 2019	N/A	N/A	N/A	
12	April 2019	N/A	N/A	N/A	
Total		N/A	N/A	N/A	

B. Monthly Records of Certified CPO & PK since the last audit				
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)	
1	May 2018	N/A	N/A	
2	June 2018	N/A	N/A	
3	July 2018	N/A	N/A	
4	August 2018	N/A	N/A	
5	September 2018	N/A	N/A	
6	October 2018	N/A	N/A	
7	November 2018	N/A	N/A	
8	December 2018	N/A	N/A	
9	January 2019	N/A	N/A	
10	February 2019	N/A	N/A	
11	March 2019	N/A	N/A	
12	April 2019	N/A	N/A	
Total		N/A	N/A	

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C.	C. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	No. Month - Year Volume of FFB from certified supply bases (mt)		Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)	
	N/A	N/A	N/A	N/A	
	N/A	N/A	N/A	N/A	

D.	D. Monthly Records of Certified CPO & PK since the last audit				
No. Month - Year Certified CPO (mt) Certified PK (mt)					
	N/A	N/A	N/A		
N/A N/A N/A					

E. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any)					
No.Buyers NamePalmtrace Trading License NumberCertified CPO Sold (mt)Certified PK (mt)					
	N/A	N/A	N/A	N/A	
	N/A	N/A	N/A	N/A	

F. 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)	
	N/A	N/A	N/A	N/A	
	N/A	N/A	N/A	N/A	

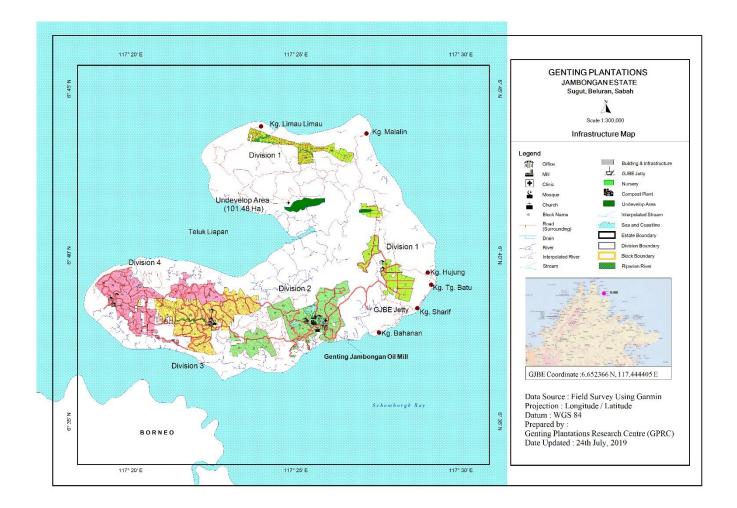
G. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)					
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)		
	N/A	N/A	N/A		
N/A N/A N/A					

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



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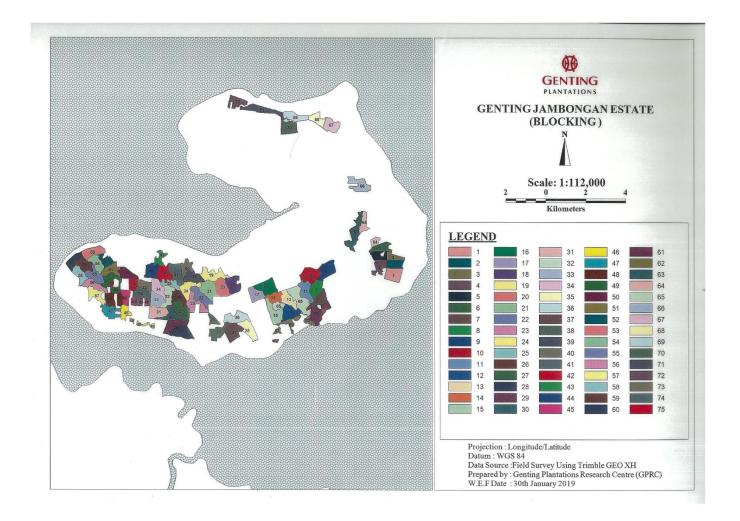
Appendix F: Location Map of Jambongan Oil Mill Certification Unit and Jambongan Estate





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Appendix G: Jambongan Estate Field Map





Appendix H: List of Smallholder Sampled

Not Applicable

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Appendix I: List of Abbreviations

a.i BOD CB CHRA	Active Ingredient Biochemical Oxygen Demand Certification Bodies 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 GAP	Free, Prior, Informed and Consent Good Agricultural Practice
GHG	Good Agricultural Fractice Greenhouse Gas
GJBE	Genting Jambongan Estate
GJOM	Genting Jambongan Oil Mill
GMP	Good Manufacturing Practice
GPS	Global Positioning System
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 Sustainalbe Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
LD50 MB	Lethal Dose for 50 sample Mass Balance
MSDS	Mass balance Material Safety Data Sheet
MT	Material Salety Data Sheet
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
РКО	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 SEIA	Supply Chain Certification Standard
SIA	Social & Environmental Impact Assessment Social Impact Assessment
SOP	Standard Operating Procedure
501	