

**RSPO PRINCIPLE AND CRITERIA –  
2<sup>nd</sup> Annual Surveillance Assessment (ASA2)  
Public Summary Report**

<b>Genting Plantations Berhad</b>
Client company Address: Genting Plantations Berhad 10 <sup>th</sup> Floor, Wisma Genting Jalan Sultan Ismail 50250 Kuala Lumpur Malaysia
Certification Unit:  <b>Genting Bukit Sembilan Estate</b>  Location of certification unit: 09300 Kuala Ketil, Kedah, Malaysia

**TABLE of CONTENTS**

**Page No**

Section 1: Scope of the Certification Assessment.....	4
1.    Company Details .....	4
2.    Certification Information .....	4
3.    Other Certifications.....	4
4.    Location(s) of Mill & Supply Bases .....	4
5.    Description of Supply Base .....	5
6.    Plantings & Cycle.....	5
7.    Certified Tonnage of FFB (Own Certified Scope) .....	5
8.    Certified Tonnage of FFB (from other certified unit(s)) if applicable *.....	5
9.    Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable .....	6
10.   Certified Tonnage .....	6
11.   Actual Sold Volume (CPO) .....	6
12.   Actual Sold Volume (PK) .....	6
13.   Actual Group certification Claims .....	6
Section 2: Assessment Process .....	7
2.1   Assessment Methodology, Programme, Site Visits.....	7
2.2   BSI Assessment Team: .....	8
2.3   Assessment Plan .....	9
Section 3: Assessment Findings .....	11
3.1   Normative requirement applied for this assessment:.....	11
3.2   Time Bound Plan progress for multiple management units .....	11
3.3   Progress of scheme smallholders and/or outgrowers (if applicable to this assessment) .....	13
3.4   Details of findings .....	13
1.4.1   Status of Nonconformities Previously Identified and Observations.....	14
3.4.2   Summary of the Nonconformities and Status.....	17
Appendix A: Summary of Findings .....	20
Appendix B: Approved Time Bound Plan.....	76
Appendix C: GHG Reporting Executive Summary .....	80
Appendix D: General Chain of Custody Requirements for the Supply Chain.....	82
Appendix E : CPO Mill Supply Chain Assessment Report (Module <i>E</i> - CPO Mills: <i>Mass Balance</i> )....	82
Supply Chain Declaration.....	83
Appendix F: Location Map of Genting Bukit Sembilan Estate.....	84
Appendix G: Location Map of Genting Bukit Sembilan Estate (Paya Kamunting Division).....	85

Appendix H: List of Smallholder Sampled (*If applicable – scheme/associated/group certification*) 86  
Appendix I: List of Abbreviations ..... 87

**Section 1: Scope of the Certification Assessment**

1. Company Details			
<b>RSPO Membership Number</b>	1-0086-06-000-00	<b>Membership Approval Date</b>	14/11/2006
<b>Parent Company Name</b>	Genting Plantations Berhad		
<b>Address</b>	10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia		
<b>Subsidiary (Certification Unit Name)</b>	Genting Plantations (WM) Sdn Bhd – Genting Bukit Sembilan Estate		
<b>Address</b>	09300 Kuala Ketil, Kedah, Malaysia		
<b>Contact Name</b>	Mr Arunan Kandasamy		
<b>Website</b>	<a href="http://www.gentingplantations.com/">http://www.gentingplantations.com/</a>	<b>E-mail</b>	arunan.kandasamy@genting.com
<b>Telephone</b>	+603 2333 6401 (Head office)	<b>Facsimile</b>	+603 2333 6575 (Head office)

2. Certification Information			
<b>Certificate Number</b>	RSPO 673953	<b>Date of First Certification</b>	18/09/2017
		<b>Certificate Start Date</b>	18/09/2017
		<b>Certificate Expiry Date</b>	17/09/2022
<b>Scope of Certification</b>	Production of Fresh Fruit Bunches		
<b>Applicable Standards</b>	RSPO P&C MYNI 2014		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 682996	MSPO MS 2530-3:2013 – General Principles for Oil Palms Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	27/01/2024
EU-ISCC-Cert-DE119-60196938	ISCC EU	ASG Cert GmbH	05/06/2020

4. Location(s) of Mill & Supply Bases			
Name (Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude

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

Genting Bukit Sembilan Estate (GBSE – Main Division)	09300 Kuala Ketil, Kedah, Malaysia	5° 34' 35.04" N	100° 41' 9.57" E
Genting Bukit Sembilan Estate – Paya Kamunting Division (PKD)	09300 Kuala Ketil, Kedah, Malaysia	6° 18' 19.41" N	100° 25' 15.87" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Bukit Sembilan Estate	1,180.06	2.15	51.94	1,234.15	95.62

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Bukit Sembilan Estate	0	77.83	475.88	505.23	121.12	1,180.06	0

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (Sept 2018-Aug 2019)	Actual (July 2018-June 2019)	Forecast (Sept 2019-Aug 2020)
Genting Bukit Sembilan Estate	26,420.00	26,260.65	24,500.00

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated	Actual	Forecast (Sept 2019-Aug 2020)
	N/A		N/A
<b>Total</b>			

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

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b>			
Independent FFB Supplier	Tonnage / year		
	Estimated (Sept 2018-Aug 2019)	Actual (July 2018-June 2019)	Forecast (Sept 2019-Aug 2020)
N/A			

<b>10. Certified Tonnage</b>			
Mill Capacity: MT/hr	Estimated (Sept 2018-Aug 2019)	Actual (July 2018-June 2019)	Forecast (Sept 2019-Aug 2020)
	FFB	FFB	FFB
	26,420.00 mt	26,260.65 mt	24,500.00 mt
SCC Model: IP	CPO (OER: 20.5%)	CPO (OER: 20.5%)	CPO (OER: 20.5%)
	5,416.10 mt	5,383.43 mt	5,022.50 mt
	PK (KER: 5.5%)	PK (KER: 5.5%)	PK (KER: 5.5%)
	1,453.10 mt	1,444.33 mt	1,347.50 mt

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

<b>12. Actual Sold Volume (PK)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)					N/A

<b>13. Actual Group certification Claims</b>		
	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)  
Unit 3, Level 10, Tower A  
The Vertical Business Suites, Bangsar South  
No. 8, Jalan Kerinchi  
59200 Kuala Lumpur  
Tel +603 2242 4211 Fax +603 2242 4218  
Nicholas Cheong: [Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com)  
[www.bsigroup.com](http://www.bsigroup.com)

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

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site annual surveillance assessment was conducted on 24-25/07/2018. The approach to the audit was to treat the estate as an RSPO Certification Unit. 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 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 (MYNI-2014) was used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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 annual surveillance assessment are detailed in Section 3.4.

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

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 (Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 4)	Year 5 (ASA 5)
Genting Bukit Sembilan Estate	√	√	√	√	√

**Tentative Date of Next Visit:** July 21, 2020 – July 22, 2020

**Total No. of Mandays:** 4.5 mandays

**2.2 BSI Assessment Team:**

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Muhamad Naquiuddin Mazeli	Trainee auditor Lead	He hold Bachelor of Science Horticulture at University Putra Malaysia. He has 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company. He is a trained as Safety and Health Officer, Food Safety System (FSSC and ISO 22000) for Mill and refineries, ISO 9001, ISO 45001 and already attend HCV training with Proforest. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation. He is fluent in Bahasa Malaysia and English languages.
Hafriazhar Mohd Mokhtar	Team member	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C



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

		Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands and Africa During assessment, he covered the mill and estate best practices, legal issues, social issues, workers consultation, stakeholder consultation, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.
Amir Bahari	Team member	He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health. He is fluent in both verbal/written in Bahasa Malaysia and English.

**Accompanying Persons:**

No.	Name	Role
1	Nil	

**2.3 Assessment Plan**

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

Date	Time	Subjects	MN	HM	AB
Tuesday, 23/07/2019		Travel to Kuala Ketil and check in Hotel.	√	√	√
Wednesday 24/07/2019	0830-0900	Genting Bkt Sembilan Estate: Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).</li> </ul>	√	√	√

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

Date	Time	Subjects	MN	HM	AB
	0900–1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√		√
	1230–1330	Lunch	√	√	√
	1330–1700	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).  •	√	√	√
	1700–1730	Interim Closing Briefing	√	√	√
Thursday, 25/7/2019	0830–1000	Genting Bkt Sembilan Estate: Continue documentation review/site visit.	√	√	√
		Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		√	
	1000-1100	Verify any outstanding issues & Preparation for closing meeting	√	√	√
	1100-1230	Closing meeting	√	√	√
	1230-1700	Travelling Back	√	√	√

### Section 3: Assessment Findings

#### 3.1 Normative requirement applied for this assessment:

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

#### 3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
<b>Summary of the Time Bound Plan</b>		
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? <ul style="list-style-type: none"> <li>• Age of plantations.</li> <li>• Location.</li> <li>• POM development</li> <li>• Infrastructure.</li> <li>• Compliance with applicable law.</li> </ul>	The TBP is challenging due to progressive development, location of the estates and mills. ISPO and MSPO are mandatory requirements in Indonesia and Malaysia, thus the Sustainability team is also focusing on the implementation and compliance. This TBP is made more challenging due to the announcement by RSPO below.	Yes
Have there been any changes since the last audit? Are they justified?	On 12 October 2017, the RSPO Secretariat released a statement on Hak Guna Usaha (HGU) to Indonesian stakeholders ( <a href="https://rspo.org/news-and-events/announcements/revised-rspo-updated-statement-on-hak-guna-usaha-july-2018">https://rspo.org/news-and-events/announcements/revised-rspo-updated-statement-on-hak-guna-usaha-july-2018</a> ), 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.	Yes

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

	<p>Pursuant to this, which was effective as of 12 October 2017, RSPO members must have a legitimate right to cultivate (Hak Guna Usaha or a HGU) and IUP in order to secure the RSPO certificates.</p> <p>As of Feb 2019, only 2 PTs in Indonesia have obtained the HGU. The rest are in process of applying for the HGU. Due to the unpredictable timeline for the HGU process, the company will revise this TBP according to the issuance of the HGU.</p>	
If there have been changes, what circumstances have occurred?	No any circumstances occur that lead to any changes.	N/A
Have there been any stakeholder comments?	To-date, no comments received from stakeholders on the TBP.	Yes
Have there been any newly acquired subsidiaries?	No new acquisition as of 1 Feb 2019	Yes
If yes, have the newly acquisitions certified within a three-year timeframe?	N/A	N/A
Have there been any isolated lapses in implementation of the plan?	No lapses however re-scheduling of the certification dates has been made.	Yes
<b>Un-Certified Units or Holdings</b>		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	<p><u>Sabah</u></p> <p>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.</p> <p>2. Genting Jambongan Estate – Concept Note and Remediation Plan has been submitted to RSPO. RSPO allowed for Genting Jambongan to proceed with its certification programme.</p> <p><u>Indonesia</u></p> <p>1. PT SISM – LUCA passed. Concept Note and Remediation Plan submitted and approved by Panel. Action plan to be checked by auditor during the next audit.</p> <p>2. PT GAL – LUCA under review by RSPO.</p>	Yes
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	NPP for PT PALJ, PT AAC, PT UAI, PT SMA, PT KIU are in progress.	Yes
Any Land conflicts are being resolved through a mutually	<a href="http://www.rspo.org/members/complaints/status-of-complaints/view/38">http://www.rspo.org/members/complaints/status-of-complaints/view/38</a>	Yes

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

agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4,7.5 and7.6.	(Complaints officially closed on 31 October 2016)	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion6.3.	None	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	<a href="https://askrspo.force.com/Complaint/s/casetracker">https://askrspo.force.com/Complaint/s/casetracker</a> No any legal non-compliance occur.	Yes
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Internal audit was conducted for uncertified units on periodical basis by Sustainability Team. Internal audit report indicated the positive assurance has been produced.	Yes

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

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

**3.4 Details of findings**

No nonconformity raised during the 2<sup>nd</sup> annual surveillance assessment.

Opportunity for Improvements	
OFI #	Description
<b>OFI 1</b>	<p><b>1805319-201904-11</b></p> <p><b>Indicator 4.5.1</b> Implementation of Integrated Pest Management (IPM) plans shall be monitored.</p> <p><b>Details:</b> Implementation of Integrated Pest Management (IPM) plans can be further improved in its monitoring and status.</p>

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

Positive Findings	
PF #	Description
PF 1	Good documentation record and good team work.

**1.4.1 Status of Nonconformities Previously Identified and Observations**

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1652689-201806-M1	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 2.1.1 Major
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	06/09/2018
<b>Statement of Nonconformity</b>	Evidence of compliance with relevant legal requirements was not effectively implemented.		
<b>Requirement Reference</b>	Evidence of compliance with relevant legal requirements shall be available.		
<b>Objective Evidence</b>	Referring to Workers Minimum Housing and Amenities Act 1990, section 19 (3): employer responsibility to appoint VMO for clinic visit once every 2 weeks @ fortnightly. Based on contract dated 1/1/18, under para 3.0 VMO visit is once a month.		
<b>Corrective Action</b>	To review and revise all the other existing contract agreement to comply with the legal requirements and LRR.		
<b>Assessment Conclusion</b>	<u>Verification during ASA2:</u> From the latest VMO visit already been done 2 weeks once and latest visit was on 15 July 2019. Thus Major NC remain close.		

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1652689-201806-M2	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 6.5.2 Major
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	06/09/2018
<b>Statement of Nonconformity</b>	Implementation of the employment contract was not completely effective.		
<b>Requirement Reference</b>	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.		
<b>Objective Evidence</b>	Sampled workers found that they were not signed on the new addendum of employment contract dated 21/3/2018 as below: a. Employee No.: 01089 b. Employee No.: 02415 c. Employee No.: 02462 d. Employee No.: 02469		

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

	Besides, the watchman (Employee No.: 02548) that recruited on March 2018 has yet to sign the employment contract.
<b>Corrective Action</b>	<p>To ensure all the legal and sustainability requirements are conveyed and communicated effectively throughout the entire management levels.</p> <p>Follow up on the implementation also will be scrutinized closely by the management.</p> <p>Sustainability team to check and ensure the addendum &amp; employment agreement requirements are complied during the Sustainability Internal Audit.</p>
<b>Assessment Conclusion</b>	<p><u>Verification during ASA2:</u>          Employment contracts for checkroll and contract workers were acknowledged and kept a copy by the workers verified through interviewed with the workers. The contract was in the language that understood by the workers. The terms and conditions were clearly stated in the contract such as salary, annual leaves and public holiday entitlement. Sampled of employment contracts as below:</p> <ul style="list-style-type: none"> <li>- Employee # 26709; Joined date: 6/1/2018; Post: Harvester</li> <li>- Employee # 02559; Joined date: 10/1/2019; Post: Harvester</li> <li>- Employee # 26697; Joined date: 28/5/15; Post: Weeder</li> <li>- Employee # 26708; Joined date: 6/1/2018; Post: Weeder</li> <li>- Employee # 02540; Joined date: 21/2/2018; Post: Harvester</li> <li>- Employee # 02407; Joined date: 8/5/2003; Post: Weeder</li> <li>- Employee # 02436; Joined date: 3/7/2012; Post: Weeder</li> <li>- Employee # 02537; Joined date: 2/2/2018; Post: Harvester</li> <li>- Employee # 02472; Joined date: 5/10/2011; Post: Harvester</li> </ul> <p>Thus major NC remain close.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1652689-201806-N1	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 5.2.4 Minor
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	25/07/2019
<b>Statement of Nonconformity</b>	The management plan did not monitor the ongoing status of the HCV.		
<b>Requirement Reference</b>	Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> <li>• The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>• Outcomes of monitoring shall be fed back into the management plan.</li> </ul>		
<b>Objective Evidence</b>	HCV monitoring checklist has been established to monitor the status of the HCV and RTE according to the recommendation of the HCV assessment report. The monitoring includes present of the wildlife, encroachment, protection of flora and ensure all signage are in good conditions. <p>The last monitoring was conducted on 26/06/2018 for Bukit Sembilan main division. The outcome of the monitoring was reviewed with the Estate Managers. The monitoring results is reflective to the management plan.</p>		

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

	However, the management plan did not consider appropriate management prescriptions for HCV 1.4 and those species that are using the area for critical feeding, nesting/ roosting sites, pathways or contains saltlicks.
<b>Corrective Action</b>	Relook and reassess all the HCV areas since the HCV assessment was done 8 years ago.
<b>Assessment Conclusion</b>	<p><u>Verification during ASA2:</u>  HCV monitoring checklist has been established to monitor the status of the HCV and RTE according to the recommendation of the HCV assessment report.</p> <ul style="list-style-type: none"> <li>a) The monitoring includes present of the wildlife, encroachment, protection of flora and ensure all signage are in good conditions.</li> <li>b) The last monitoring was conducted on 26/06/2018 for Bukit Sembilan main division. The outcome of the monitoring was reviewed with the Estate Managers.</li> <li>c) The monitoring results are reflective to the management plan.</li> </ul> <p>The CU observed implemented the established action plans, including monitoring (patrolling) of the conservation areas by Auxiliary Police. Records of monitoring (patrolling) are maintained dated June 2019. There is no monitoring outcome that requires changed of practices or action plan. Thus Minor NC remain close.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1652689-201806-N2	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 5.4.1 Minor
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	25/07/2019
<b>Statement of Nonconformity</b>	The management plan was not effectively monitored for any changes required to meet the fossil fuels usage efficiency.		
<b>Requirement Reference</b>	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy shall be in place and monitored.		
<b>Objective Evidence</b>	Management plan has been established to improve the efficiency of the fossil fuel usage. However, the management plan dated 25/07/2018 did not consider a change of plan or further improvement identification since the diesel usage for the first 6 months of 2018 is 1.52l per ton of FFB as compared to year 2017.		
<b>Corrective Action</b>	Will keep a close monitoring of the crop trend. Management plan will be revised accordingly and target of the diesel consumption based on more realistic figures.		
<b>Assessment Conclusion</b>	<p><u>Verification during ASA2:</u>  A plan has been established to improve the efficiency of the use of fossil fuels incorporated in the <i>Environmental Aspect and Impact Assessment Register 2019</i> with the latest revision dated 20/7/19. Refer Indicator 5.4.1 for further detail. Thus Minor NC remain close.</p>		



**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1502868-201707-M1	Major	5.1.1	13/07/2017	Closed out on 24/07/2017
1652689-201806-M1	Major	2.1.1	26/07/2018	Closed out on 6/9/2018
1652689-201806-M2	Major	6.5.2	26/07/2018	Closed out on 6/9/2018
1652689-201806-N1	Minor	5.2.4	26/07/2018	Closed out on 25/7/2019
1652689-201806-N2	Minor	5.4.1	26/07/2018	Closed out on 25/7/2019

**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 Bukit Sembilan Estate 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.

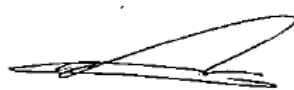
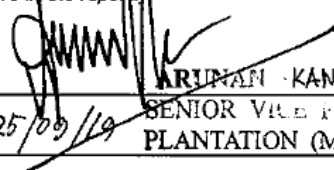
Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their 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.

<b>List of Stakeholders Contacted</b>	
<b>Internal Stakeholders</b> Workers Representative Gender Committee Mill Operators Sprayer	<b>Union/Contractors/Local Communities</b> Contractor NUPW Secretary Kampung Kuala Bakong village representative Kampung Keok Seng village representative
<b>Government Departments</b> Representative from SJK(T) Bukit Sembilan	<b>NGO</b> No complaint by NGO for Genting Bukit Sembilan CU. Therefore, NGO was not contacted.

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

IS #	Description
1	<p><b>Feedbacks:</b> Kampung Kuala Bakong village representative – having few villagers working with company at the estate. No issue in estate and villagers land boundary</p> <p><b>Management Responses:</b> Priorities always given to local communities to fulfil any relevant post vacancy within estate. Periodical consultation made with villagers from time to time</p> <p><b>Audit Team Findings:</b> No further issue</p>
2	<p><b>Feedbacks:</b> Kampung Keok Seng village representative – have good relationship with management and staff of Genting Bukit through participation of both party in respective community programs</p> <p><b>Management Responses:</b> Good relationship with local community always maintained despite periodical changes of person-in-charge of estate among managers, assistant managers and staffs</p> <p><b>Audit Team Findings:</b> No further issue</p>
3	<p><b>Feedbacks:</b> Vendors &amp; contractors – long service to Genting Plantation since Asiatic time for more than 10 years. No issue in pricing and payment</p> <p><b>Management Responses:</b> Positive comment noted</p> <p><b>Audit Team Findings:</b> No further issue</p>
4	<p><b>Feedbacks:</b> Smallholder neighbour – estate management always been considerate to allow access for smallholders to their land crossing through estate area</p> <p><b>Management Responses:</b> Estate access were guarded by security personnel and any security matters always reported to the management</p> <p><b>Audit Team Findings:</b> No further issue</p>
5	<p><b>Feedbacks:</b> SJK(T) Bukit Sembilan Teacher – school always received good support and contribution from estate management in all its school programs</p> <p><b>Management Responses:</b> Education is part of necessity to be ensured among workers’ children</p> <p><b>Audit Team Findings:</b> No further issue</p>
6	<p><b>Feedbacks:</b> Local &amp; Foreign Workers – no issue in provision of housing and accommodation. PPE always provided by management. Contract agreements terms and conditions were fully explained by management</p> <p><b>Management Responses:</b> Workers conditions are always priority to management</p> <p><b>Audit Team Findings:</b> All feedbacks from workers were used as the input to the checklist</p>

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

<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Genting Bukit Sembilan Estate Certification Unit has complied with the RSPO P&amp;C MYNI 2014 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 Bukit Sembilan Estate is approved &amp; continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> Muhammad Naquiuddin	<b>Name:</b> Arunan Kandasamy
<b>Company Name:</b> BSI Services Malaysia Sdn Bhd	<b>Company Name:</b> Genting Plantations Berhad
<b>Title:</b> Trainee Lead Auditor	<b>Title:</b> Senior Vice President-Plantation
<b>Signature:</b> 	<p><b>Signature:</b></p> <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> <p> KAK ARUNAN KANDASAMY</p>
<b>Date:</b> 23 Sept 2019	<b>Date:</b> 25/09/19 SENIOR VICE PRESIDENT PLANTATION (MALAYSIA)

**Appendix A: Summary of Findings**

Criterion / Indicator		Assessment Findings	Compliance
<b>Principle 1: Commitment to Transparency</b>			
<b>Criterion 1.1:</b> Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Requests for information from the Regulatory Department such as DOE and DOSH during compliance visit were attended. Workers normally request for house repairing which are attended promptly. Besides, Genting Plantations Berhad also published annual report which incorporating upstream and downstream information.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	Implemented based on Sustainability Management Procedure for Consultation and Communication; SMP-GPB-17; Rev. 02; Date: 23/2/2018. Consultation & communication done through meetings, dialogs, engagement to both internal & external stakeholders and recorded in Genting Plantations Complaints/Grievance Record Book – Estate: GBSE. Latest briefing on procedure and policies was conducted on 18/7/2019. Sighted latest complaints received from internal stakeholder (harvester) (ref. # 126; dated 18/7/2019) on toilet piping blocking. Sighted immediate action taken accordingly. No any external complaints/grievances received from external stakeholder.  Specific to Bukit Sembilan Estate – Procedure for Complaints and Grievances for Workers, Suppliers, Contractors and Other Stakeholders of Genting Bukit Sembilan Estate with Flow-Chart.	Complied
<b>Criterion 1.2:</b> Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			

Criterion / Indicator	Assessment Findings	Compliance
1.2.1 Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none"> <li>• Land titles/user rights (Criterion 2.2);</li> <li>• Occupational health and safety plans (Criterion 4.7);</li> <li>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</li> <li>• HCV documentation (Criteria 5.2 and 7.3);</li> <li>• Pollution prevention and reduction plans (Criterion 5.6);</li> <li>• Details of complaints and grievances (Criterion 6.3);</li> <li>• Negotiation procedures (Criterion 6.4);</li> <li>• Continual improvement plans (Criterion 8.1);</li> <li>• Public summary of certification assessment report;</li> <li>• Human Rights Policy (Criterion 6.13).</li> </ul> - Major compliance –	<p>All documents required by this indicator are made publicly available to all stakeholders. Genting Plantations Berhad require them to fill in the Enquiry Register Book in order to access the documents. The Corporate Department will ensure that the requested documents made available do not impinge on confidentiality and will not cause detrimental sustainability or negative social outcomes.</p> <p>Sustainability Report and Annual Report are published annually and made publicly available at website: <a href="http://www.gentingplantations.com">www.gentingplantations.com</a>.</p> <p>In addition to the website, the policies were also seen displayed at various locations at the operating units including the main notice boards of the estates and mill offices notice boards for employees and visitors to view.</p>	<p>Complied</p>
<b>Criteria 1.3:</b> Growers and millers commit to ethical conduct in all business operations and transactions.		
1.3.1 There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance	<p>Genting Plantations Berhad has developed Ethical Conduct and Integrity Policy dated 22/6/2015. The company is committed to conduct its business ethically and with integrity at all times. The following values need to be followed by all the employees:</p> <ol style="list-style-type: none"> <li>i. Respect for fair conduct of business</li> <li>ii. Refrain from all forms of corruption, bribery and fraudulent use of funds and resources</li> <li>iii. Respect and protect confidential and/ or privileged information to which we have access in the course of our duties</li> </ol> <p>All the contractors and workers have been briefed on the policy during induction training once arrived to the mill. Seen the Induction Book and</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		sighted the contractors. Visitors and new recruited workers have attended the induction training.	
<b>Principle 2: Compliance with applicable laws and regulations</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	Evidence of compliance with relevant legal requirements shall be available. - Major compliance -	<ul style="list-style-type: none"> <li>Estate MPOB license # 508759002000; Validity: 1/6/2019-31/5/2020; Area reg.: 486.27 ha</li> <li>Estate MPOB license # 508758102000; Validity: 1/6/2019-30/5/2020; Area reg.: 802.49 ha</li> <li>CF for air receiver: KD PMT 4993 valid until 1/7/2020</li> <li>CePSWaM Certificate: CePSWaM/01714</li> <li>Permit for diesel is in progress. Latest communication was sighted (through BLESS system) on 9/7/2019.</li> </ul>	Complied
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	<p>List of applicable legal documented under LRR @ legal requirement register, SMP-GPB-22. The latest revision of register, rev: 6 dated 28th May 2018 was made available for verification.</p> <p>The Procedure on regional, national and international Laws (doc: SMP-GPB-21) described the mechanism of tracking the changes of laws is contained in the legal requirements register</p>	Complied
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	<p>The internal audit checklist was reviewed and it contained the criteria to audit the legal compliance that is applicable to the company. The person responsible- chief clerk responsible for update the legal requirements register file and disseminate the changes by notice to the respective manage, assistant manager and decisional assistant managers. Refer to letter for appointment dated 1 Sept 2018 for the PIC for updating changes in laws.</p> <p>As described in the Procedure on regional, national and international Laws (doc: SMP-GPB-21; revision 1; issue on 14 Aug 2014), mechanism</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		of tracking the changes of laws is contained in the legal requirements register. HQ will update if any legal changes and inform all operating unit that applicable to law. Other mechanism to ensure they comply with legal and other requirement was the internal audit checklist was reviewed and it contained the criteria to audit the legal compliance that is applicable to the company.	
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 law (SMP-GPB-21; dated 14th Aug 2014) for tracking any changes in the law. For the changes of laws, the company will refer to as Notification of changes from various source of information, Monitoring for changes in the Law, Clarification and review on the changes, Updating of the Legal register administered internally, Notification to the operating units and/or the relevant person in charge.	Complied
<b>Criterion 2.2:</b> The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.			
2.2.1	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	GBSE divided into 2 divisions with a total of 10 land titles/user rights as per sighted samples as following: <ul style="list-style-type: none"> <li>• Main Div.: <ul style="list-style-type: none"> <li>i) Title # 36096; Lot # 52; Area: 564.9902 ha</li> <li>ii) Title # 36097; Lot # 53; Area: 21.0368 ha</li> </ul> </li> <li>• Paya Kamuniting Div.: <ul style="list-style-type: none"> <li>i) Title # GRN 197658; Lot # 3221; Area: 15.34 ha</li> <li>ii) Title # GRN 197658; Lot # 3199; Area: 3.818 ha</li> </ul> </li> </ul> Area Statement as per Monthly Progress Report. The grants are attached with proper demarcated maps issued by the state authorities.	Complied
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	The land boundaries are observed onsite at Field 2001 boundary with Lee Nam Huat and it was confirmed from the surrounding smallholders that there were not land conflicts.	Complied

Criterion / Indicator	Assessment Findings	Compliance
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	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	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	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	Complied
<b>Criterion 2.3:</b>		



Criterion / Indicator		Assessment Findings	Compliance																																
Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.																																			
2.3.1	<p>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 neighboring communities where applicable, and relevant authorities).</p> <p>- Major compliance -</p>	<p>There is no land dispute in the Genting Bukit Sembilan Estate at the time of audit This was verified through interview with the smallholders and local communities. The land belongs to <i>Genting Plantations (WM) Sdn Bhd</i> and the land ownership documents verified. The following list of land title were sighted and verified.</p> <table border="1"> <thead> <tr> <th></th> <th>Lot no</th> <th>HSD no</th> <th>Land title ha</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>52</td> <td>GRN36096</td> <td>564.9902</td> </tr> <tr> <td>2</td> <td>53</td> <td>36097</td> <td>21.0368</td> </tr> <tr> <td>3</td> <td>54</td> <td>36098</td> <td>118.7802</td> </tr> <tr> <td>4</td> <td>56</td> <td>35789</td> <td>58.0233</td> </tr> <tr> <td>5</td> <td>57</td> <td>35790</td> <td>29.5435</td> </tr> <tr> <td>6</td> <td>339</td> <td>GM00046</td> <td>0.0588</td> </tr> <tr> <td></td> <td></td> <td></td> <td>792.433</td> </tr> </tbody> </table>		Lot no	HSD no	Land title ha	1	52	GRN36096	564.9902	2	53	36097	21.0368	3	54	36098	118.7802	4	56	35789	58.0233	5	57	35790	29.5435	6	339	GM00046	0.0588				792.433	Complied
	Lot no	HSD no	Land title ha																																
1	52	GRN36096	564.9902																																
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			792.433																																
2.3.2	<p>Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include:</p> <p>a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making;</p> <p>b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken;</p> <p>c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected</p>	<p>There's no any significant land conflict except that a resolution has arrived on the prolonged issue of squatter within Genting Bukit Sembilan Estate. From a minutes of meeting dated 3/5/2019, a settlement was agreed between the squatter and estate management that the following term were to be followed:</p> <ul style="list-style-type: none"> <li>- Squatter cannot extend existing house or construct additional house or expand the boundary of area squatted</li> <li>- Squatter allowed to continue occupy existing squatted Genting Plantation Berhad land but not allowed to hand over or inherit the area to anyone including family member</li> <li>- The occupied area need to be surrender back to Genting Plantation Berhad when no longer use</li> <li>- The terms were agreed upon and signed by the estate management on 6/5/2019 and by squatter on 28/5/2019.</li> </ul>	Complied																																

Criterion / Indicator	Assessment Findings	Compliance
	<p>communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	
<p>2.3.3</p>	<p>All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>-Minor compliance</p>	<p>Complied</p>
<p>2.3.4</p>	<p>Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel.</p> <p>-Major compliance</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance												
		The terms were agreed upon and signed by the estate management on 6/5/2019 and by squatter on 28/5/2019.													
<b>Principle 3: Commitment to long-term economic and financial viability</b>															
<b>Criterion 3.1:</b> 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 -	In GBSE, 4 year management plan the annual budget with projection is available covering a period from 2019-2022 that specifies the activities/elements. Sighted the latest GBSE Summary of Capital Expenditure Costs for Fiscal Year 2019 (01/01/2019 to 31/12/2019). Sighted part of the approved CAPEX. For Fresh Fruit Bunch (FFB) all been sold as conventional, Genting Bukit Sembilan supply FFB to 3 Mill:- i) Sime Darby Sg Dingin Mill, Karangan, Kedah ii) Setiakawan, Kulim, Kedah & iii) Solid Orient Holdings Sdn Bhd, Kuala Ketil, Kedah	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 -	There is no replanting happened in Bukit Sembilan Estate. The projection for the replanting is available from 2019-2023. The breakdown of the replanting as a below: <table border="1" data-bbox="1010 1018 1451 1217"> <thead> <tr> <th>Year</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>103.74</td> </tr> <tr> <td>2020</td> <td>117.58</td> </tr> <tr> <td>2021</td> <td>83.02</td> </tr> <tr> <td>2022</td> <td>99.56</td> </tr> <tr> <td>2023</td> <td>81.38</td> </tr> </tbody> </table>	Year	Ha	2019	103.74	2020	117.58	2021	83.02	2022	99.56	2023	81.38	Complied
Year	Ha														
2019	103.74														
2020	117.58														
2021	83.02														
2022	99.56														
2023	81.38														
<b>Principle 4: Use of appropriate best practices by growers and millers</b>															
<b>Criterion 4.1:</b> Operating procedures are appropriately documented, consistently implemented and monitored.															

Criterion / Indicator	Assessment Findings	Compliance
4.1.1 Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	<p>Standard Operating Procedures (SOPs) for estates was not changes from the previous assessment. Similar as per previous assessment, At Genting Bukit Sembilan 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. All the estate implemented through its daily operations.</p> <p>The procedure for Occupational Health and Safety has been established and implemented. Sighted the procedure for Accident investigation, PTW, PPE, workshop, harvesting, manuring, pest &amp; disease were available during the assessment.</p> <p>The procedure for mechanization was established and available at estate office. Sighted the procedure, namely Group Plantation Advisory dated 16/4/2013: 1. Structured Cluster Harvesting : MECH-01 2. Mechanically Assisted Collection (MAC): MECH-02 3. Buffalo Assisted Collection (BAC):MECH-03A 4. Buffalo Training: MECH-03B 5. Buffalo Selection and Haulage: MECH-03C</p>	Complied
4.1.2 A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	<p>Based on Sustainability Management Manuals, Procedures and Policies (RSPO, MSPO and ISCC) Document Masterlist; form # SMP-GPB-01-F01-01; updated 15/8/2014, a set of policies, procedures and manuals have been established as best management practices for all activities related to mill and estate operations. And SOP Genting Peninsular Malaysia Estates; Revision 2 – December 2010</p>	Complied

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

Criterion / Indicator		Assessment Findings	Compliance
		Sighted Internal Audit report conducted from 10-11/7/2019 by Lead Auditor (P. Sivaji Raja) from Sustainability Department. 5 Major NCRs were raised. Sighted that all findings still in progress of closure.	
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	Annual agronomist visit was carried out last year on 3-4 April 2019 by GPRC department, Tebong. A few issues identified from the visit related to crop production (bunch set formation), crop management/field maintenance and low yielding field such as 70-80% at main division and 80-90% of PKD are affected by pre mature frond snapping.	Complied
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	Not Applicable	Not applicable
<b>Criterion 4.2:</b>			
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	GBSE continuously implement practices good agricultural practices as guided in their SOPs (Oil Palm Manual, dated 30/8/2013). They are followed to manage the soil fertility to levels ensuring optimal and sustainable yields.	Complied
4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	Fertilizers are applied as per agronomist recommendation. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. For 2019, 1st half of fertilizer application was completed in March 2019. The programme started in January 2019 for fertilizer application.	Complied
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	The agronomist from GPRC will visit the estate and conduct the sampling on annual basis. Based on Soil Sampling Procedure dated 1/12/17, the frequency of analysis is every 5 years. The last soil sampling was carried out on March 2016, refer to report SR08/2016 dated 7 March 2016	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.	Based on SOP Manual, OPM 7: Manuring of Oil Palm, the nutrient strategy includes the use of Empty Fruit Bunches (EFB) distributed in the field to improve the soil structure as well as to improve the organic	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	matter. Recommendation per round is 25 MT (main division) and PKD is 40 mt per round.	
<b>Criterion 4.3:</b> Practices minimise and control erosion and degradation of soils.			
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Map available prepared by Genting Research Centre dated 26 August 2013. Based on the soil map, there is no other fragile and problem soils found in GBSE and its divisions. Landscapes of GBSE are mostly undulating, flat, rolling and hilly. No planting within areas more than 25 degrees in GBSE.	Complied
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 -	Landscapes of GBSE are mostly undulating, flat, rolling and hilly. No planting within areas more than 25 degrees in GBSE. Management also have establish procedures for guidance OPM 4 : Soil conservation and terracing (rev 2013) and also the Steep land Management SMP –GPB-10.	Complied
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	The road maintenance programme was established to cover the road patching and road grading activities. The monthly road maintenance programme was sighted. Almost 55% was done by management to maintain the road 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 -	Not applicable because no peat soil or acid sulfate soil in estate.	Not applicable
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 -	Not applicable	Not applicable

Criterion / Indicator		Assessment Findings	Compliance
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 -	Not applicable.	Not applicable
<b>Criterion 4.4:</b> Practices maintain the quality and availability of surface and ground water.			

Criterion / Indicator		Assessment Findings			Compliance																												
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	<p>The Water Management Plan 2019 for the estate has been established with the latest review made on 18/7/19. The plan emphasized on the following areas.</p> <ul style="list-style-type: none"> <li>a) Water source</li> <li>b) Efficient use of water</li> <li>c) Renewability of water source</li> <li>d) Avoidance of surface and ground water contamination</li> </ul> <p>Details of the action plan and monitoring among others as tabled below;</p> <table border="1"> <thead> <tr> <th></th> <th>Areas of concerns</th> <th></th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1</td> <td rowspan="2">Water source</td> <td>Government treated water</td> <td>Supply to residential areas /complex for all divisions</td> </tr> <tr> <td>Water from catchment pond</td> <td>Use in nursery and irrigation projects</td> </tr> <tr> <td rowspan="3">2</td> <td rowspan="3">Efficient use of water</td> <td>Residential areas</td> <td>Monitoring of pipes leakages</td> </tr> <tr> <td>Optimize usage &amp; reduce wastage</td> <td>Spraying pump maintenance</td> </tr> <tr> <td>Education/training</td> <td>Promote water conservation &amp; awareness among employees</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">Renewability water source</td> <td>Rain water capture at catchment</td> <td>Monitoring of pond level</td> </tr> <tr> <td>Rain water harvest</td> <td>Collection and usage at office</td> </tr> <tr> <td>4</td> <td>Avoidance of surface/ground</td> <td>Sewage and septic tank</td> <td>To ensure no leakage of sewage/septic tank</td> </tr> </tbody> </table>				Areas of concerns		Action Plan	1	Water source	Government treated water	Supply to residential areas /complex for all divisions	Water from catchment pond	Use in nursery and irrigation projects	2	Efficient use of water	Residential areas	Monitoring of pipes leakages	Optimize usage & reduce wastage	Spraying pump maintenance	Education/training	Promote water conservation & awareness among employees	3	Renewability water source	Rain water capture at catchment	Monitoring of pond level	Rain water harvest	Collection and usage at office	4	Avoidance of surface/ground	Sewage and septic tank	To ensure no leakage of sewage/septic tank	Complied
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Criterion / Indicator		Assessment Findings			Compliance
			water contamination	functioning properly/cover available	
			Rubbish collection at line site	Collection 3x/week Landfill located at P2005 – min 100m from residential areas. Recycling practices	
			Drainage system	Free flow drains & scheduled maintenance	
			Water pollution	Wash from chemical bays collected in sump for recycling Trap for oil constructed	
			Water quality	Sampling of water samples at various fields identified for river (Sg Bakung) water sample. Establishment of riparian zone along natural water ways. Maintain the riparian buffer zone during replanting	
		5	Others	Flood /water logging areas	
		Assessment of water usage	Guided by optimum ratio/volume per head.		

Criterion / Indicator		Assessment Findings			Compliance
				Usage is recorded and excessive consumption is investigated	

Criterion / Indicator		Assessment Findings		Compliance																																																																											
4.4.2	<p>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.</p> <p>- Major compliance -</p>	<p>The protection of water courses and wetlands guidelines are documented under GPB's Sustainability Management Procedure Manual, SMP-GPB-14, rev:1 dated 1/8/14. The riparian buffer zones are established in lined with DID Guidelines for Rivers and River Reserves Peninsular Malaysia (2001) as per the following:</p> <table border="1"> <thead> <tr> <th></th> <th>River width (Meters)</th> <th>Buffer Zone (Meters)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>&gt;40</td> <td>50</td> </tr> <tr> <td>2</td> <td>20-40</td> <td>40</td> </tr> <tr> <td>3</td> <td>10-20</td> <td>20</td> </tr> <tr> <td>4</td> <td>5-10</td> <td>10</td> </tr> <tr> <td>5</td> <td>&lt;5</td> <td>5</td> </tr> </tbody> </table> <p>The water Sampling analysis (inlet and outlet) was conducted on 19/3/19 which was analysed by Union Laboratories Sdn Bhd with results as follows. The results based on the Certificate of Analysis (CoA) ref: 03J01111, showed that the parameters were within the limits (based on WQI-DOE).</p> <table border="1"> <thead> <tr> <th></th> <th>Parameters</th> <th>INOW S limit</th> <th>STD B lab limit</th> <th>Inlet field 05</th> <th>Outlet field 05</th> <th>Inlet field 15</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>5.0-9.0</td> <td>5.5-9.0</td> <td>7.5</td> <td>7.5</td> <td>6.5</td> </tr> <tr> <td>2</td> <td>COD</td> <td>&lt;100</td> <td>200</td> <td>268</td> <td>316</td> <td>84</td> </tr> <tr> <td>3</td> <td>BOD</td> <td>&lt;12</td> <td>50</td> <td>65</td> <td>95</td> <td>48</td> </tr> <tr> <td>4</td> <td>TSS</td> <td>&lt;300</td> <td>100</td> <td>153</td> <td>90</td> <td>43</td> </tr> <tr> <td>5</td> <td>DO</td> <td>5.0</td> <td>-</td> <td>0.69</td> <td>1.08</td> <td>3.04</td> </tr> <tr> <td>6</td> <td>AN</td> <td>&lt;2.7</td> <td>20</td> <td>14.2</td> <td>14.2</td> <td>ND</td> </tr> <tr> <td>7</td> <td>P</td> <td>-</td> <td>10</td> <td>8.9</td> <td>8.1</td> <td>6.6</td> </tr> </tbody> </table>			River width (Meters)	Buffer Zone (Meters)	1	>40	50	2	20-40	40	3	10-20	20	4	5-10	10	5	<5	5		Parameters	INOW S limit	STD B lab limit	Inlet field 05	Outlet field 05	Inlet field 15	1	PH	5.0-9.0	5.5-9.0	7.5	7.5	6.5	2	COD	<100	200	268	316	84	3	BOD	<12	50	65	95	48	4	TSS	<300	100	153	90	43	5	DO	5.0	-	0.69	1.08	3.04	6	AN	<2.7	20	14.2	14.2	ND	7	P	-	10	8.9	8.1	6.6	<p>Complied</p>	
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8	E Coli	-	-	-	-	-				
4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	Not applicable since there was no mill involved in the certification.	Not applicable							
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	Not applicable since there was no mill involved in the certification.	Not applicable							
<b>Criterion 4.5:</b>										
Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.										
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators. The estates are continue to plant beneficial plants such as <i>Turnera subulata</i> Documented IPM is found in the Oil Palm Manual under 'Pest and disease (revision June 2013) OPM 5. Current IPM progress as indicated below: IPM plan BOB ratio - 1:25, planned 1:23 Occupancy rate: 24%, expected: 75%.	Complied							

Criterion / Indicator		Assessment Findings	Compliance						
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	Training records for staff and workers on IPM implementation were available and verified to be satisfactory during on-site assessment. Latest training dated 4 April 2019 was carried out by GPRC personnel	Complied						
<b>Criterion 4.6:</b> Pesticides are used in ways that do not endanger health or the environment									
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 justification of pesticide used documented under Sustainability Management Procedure Manual, SMP-GPB-28, rev:4 dated 3 July 2018. 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 Amendment to include nursery fungicide (Dixan – Mancozeb), Arakus, Fezmet, Pestac and Kenlate.	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 -	The records of pesticides used were available at GBSE. Sighted record which was update on 3/7/19. Summary of chemical usage trend for the last 2 years as follow: <table border="1" data-bbox="1012 1098 1850 1166"> <tr> <td>Year/unit</td> <td>2018</td> <td>2019</td> </tr> <tr> <td>Ai/Ha</td> <td>1.769</td> <td>1.304</td> </tr> </table>	Year/unit	2018	2019	Ai/Ha	1.769	1.304	Complied
Year/unit	2018	2019							
Ai/Ha	1.769	1.304							
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 GBSE: a) Planting of beneficial plant b) Barn Owls	Complied						

Criterion / Indicator		Assessment Findings	Compliance				
		<p>Documented IPM is found in the Oil Palm Manual under 'Pest and disease' (revision June 2013 ) OPM 5. It identified the pest such as :</p> <ul style="list-style-type: none"> <li>a) bagworms</li> <li>b) nettle caterpillars</li> <li>c) Grasshopper</li> <li>d) Rhinoceros beetles</li> <li>e) Bunch moth</li> <li>f) Vertebrates such as rats</li> <li>g) Pest &amp; Diseases in nursery</li> <li>h) Ganoderma</li> </ul> <p>There is no prophylactic use of pesticides at GBSE.</p>					
4.6.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class II, III &amp; IV chemical used at visited estate.</p>	Complied				
4.6.5	<p>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).</p> <p>- Major compliance -</p>	<p>Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers. Example of PPE provided for specific work units:</p> <table border="1" data-bbox="1010 1257 1832 1305"> <thead> <tr> <th>Activity/work unit</th> <th>PPE recommendation</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Activity/work unit	PPE recommendation			Complied
Activity/work unit	PPE recommendation						

Criterion / Indicator		Assessment Findings		Compliance				
		<table border="1"> <tr> <td>Spraying</td> <td>Respirator with organic vapour cartridge (A1P2K) Rubber nitrile gloves Chemical goggles Body apron</td> </tr> <tr> <td>Manuring</td> <td>Dust mask 3M 9010 N95 Rubber/cotton gloves</td> </tr> </table>	Spraying	Respirator with organic vapour cartridge (A1P2K) Rubber nitrile gloves Chemical goggles Body apron	Manuring	Dust mask 3M 9010 N95 Rubber/cotton gloves		
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Manuring	Dust mask 3M 9010 N95 Rubber/cotton gloves							
		All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers at field 1996A.						
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. All empty container was dispose as recycle waste and disposed at G-Planter latest dated 10 July 2019.		Complied				
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Sustainability Management Procedure Manual, SMP-GPB-28, rev:4 dated 3 July 2018. The implementation in the field is consistent with the established procedure. The estate for the weeding activities, knapsack spray pump and low volume CDA spray are used for selective spraying. Mono spray is used for circle spraying. During the audit, it was noted that <i>Genting Bukit Sembilan Estate</i> had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions.</p> <ul style="list-style-type: none"> <li>a) Paraquat usage has been prohibited in all units and the entirety of the organization.</li> <li>b) The Safety Procedures for pesticides application were well described in Pictorial Safety Standard.</li> </ul>		Complied				

Criterion / Indicator		Assessment Findings	Compliance																												
		<p>The training included the safety aspects and usage of PPE when handling with pesticides. Record of training in relation to pesticides handlings among others as shown below;</p> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>15/7/19</td> <td>PPE adherence</td> <td>entire</td> </tr> <tr> <td>2</td> <td>15/7/19</td> <td>Buffer zone management</td> <td>Entire</td> </tr> <tr> <td>3</td> <td>4/4/19</td> <td>IPM briefing</td> <td>9</td> </tr> <tr> <td>4</td> <td>11/4/19</td> <td>Chemical spillage /Mixing ERP</td> <td>15</td> </tr> <tr> <td>5</td> <td>29/3/19</td> <td>Empty pesticide container SOP</td> <td>Entire</td> </tr> <tr> <td>6</td> <td>29/3/19</td> <td>SW/waste management/oil trap</td> <td>Entire</td> </tr> </tbody> </table>		Date	Subject	Attendees	1	15/7/19	PPE adherence	entire	2	15/7/19	Buffer zone management	Entire	3	4/4/19	IPM briefing	9	4	11/4/19	Chemical spillage /Mixing ERP	15	5	29/3/19	Empty pesticide container SOP	Entire	6	29/3/19	SW/waste management/oil trap	Entire	
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4.6.8	<p>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.</p> <p>- Major compliance -</p>	<p>Aerial application of agrochemicals is not practiced in GBSE. This is confirmed through observation during the site visit, estate complex and interview with the employees.</p>	Complied																												
4.6.9	<p>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).</p> <p>- Minor compliance -</p>	<p>There are no associated smallholders with the Estate. Employees demonstrate knowledge and skills on pesticide handling. MSDS/SDS was displayed in local Bahasa Malaysia language/English at the agrochemical store for each chemical stored as well as the use of safety pictorial poster for the easy understanding of the agrochemical handlers</p> <p>Training on pesticide/chemical handling was continuously carried out at the CU. The trainings included the safety aspects and usage of PPE when handling with pesticides and herbicides. From interviews with the staff and workers such as the storekeepers and workers who applied fertilizers, it was evident that they have been trained and understood the hazards involve and how the chemicals should be used in a safe manner. Records of training were sighted and given in 4.7.3.</p>	Complied																												



Criterion / Indicator		Assessment Findings	Compliance												
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 -	Empty chemical containers are reused for premix containers for spraying activities. For those containers that are can't reused anymore, it will be disposed through scheduled waste or collected by G-Planters. Please refer to 5.3 for more details. The latest dispatch being the following; <table border="1" data-bbox="1124 587 1621 691"> <thead> <tr> <th></th> <th>Date</th> <th>type</th> <th>Units</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>10/7/19</td> <td>4 litres</td> <td>109</td> </tr> <tr> <td>2</td> <td>10/7/19</td> <td>20 litres</td> <td>102</td> </tr> </tbody> </table>		Date	type	Units	1	10/7/19	4 litres	109	2	10/7/19	20 litres	102	Complied
	Date	type	Units												
1	10/7/19	4 litres	109												
2	10/7/19	20 litres	102												
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	CHRA conducted on June 2017, DOSH reg: JKPP HIE 127/171-2(154). Health surveillance recommended for pesticides handler, workshop, Diesel handler and Sprayer. Medical surveillance done by OHD doctor under Klinik Tampin, HQ/12/DOC/00/262 Sample sprayer at Bukit Sembilan Division: 15 sprayers, conducted on 27 Oct 2018 by Poliklinik Sakhti & Sheila. From the result, all workers was fit to work with Chemical.	Complied												
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	Noted there were a few women working as chemical mixers and sprayers. Verified that the worker were over the reproductive age.	Complied												
<b>Criterion 4.7:</b> An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:															

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.1 A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.                      - Major compliance -</p>	<p>Safety and Health Policy dated 1 July 2018 and signed by the company's Chief Operating Officer &amp; President is available that among others specifies the requirement of the company to comply with the requirement of the Occupational Safety and Health Act 1994.                      OSH plan for 2019 available. Programme such as OSH training, CHRA programme (sprayer, mechanized sprayer MAS and mechanized spreader VICON), warning signages, OSH programme SHC meeting, WI, SHC training, linesite inspection was planned and implemented and latest inspection was done on 19 July 2019 and previously was on 12 July 2019. This done by weekly basis.</p> <p>Latest inspection was carried out on June 2019 by safety committee for chemical store, tractor and heavy vehicle, harvesting and fertilizer store. Workplace inspection need to be done prior to safety meeting as the inputs will be discussed in the meeting.</p> <p>Chemical register was available dated 14 August 2017. All chemical that using during operation was register in Chemical register. CHRA assessment already conducted on 15 March 2017 until 30 April 2017 by Noormahani from QMPRO Sdn Bhd. Report referred JKKP HIE 127/171-2(154)-2017/003. From the CHRA recommendation diesel, Baja, Sprayer and Workshop must be done for medical Surveillance.</p>	<p>Complied</p>
<p>4.7.2 All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.                      - Major compliance -</p>	<p>For chemical risk, CHRA assessment already conducted on 15 March 2017 until 30 April 2017 by Noormahani from QMPRO Sdn Bhd. Report referred JKKP HIE 127/171-2(154)-2017/003.                      For activity in estate, all risk was capture under HIRARC, latest review was on 18 July 2019.</p> <p>There are total of 20 Fire extinguisher(FE) available at GBSE; 4 units of CO2 and 16 units are dry powder. FE are located at each pertinent location within estate's work units and under serviceable condition. The</p>	<p>Complied</p>

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

Criterion / Indicator	Assessment Findings	Compliance
	last inspection was carried out in the month of June 2018. For First aid box last check was on 9 July 2019 by EHA. Total First aid box was 15 box including office and store.	
4.7.3	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -	Complied
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 -	Complied
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	Complied

Criterion / Indicator	Assessment Findings	Compliance												
worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -	Accident record was available dated 21 March 2019 (JKKP 6) under document NOI/JKKP.													
4.7.6 All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -	<p>Medical care is provided to all the employees. Local workers are covered under SOCSO scheme while foreign workers are covered under foreign workers compensation scheme.</p> <table border="1" data-bbox="1014 603 1816 1015"> <thead> <tr> <th>Workers Id</th> <th>Policy no</th> <th>validity</th> </tr> </thead> <tbody> <tr> <td>AT736205</td> <td>Letter of SOCSO referred CAN07201900041959</td> <td>Start 1 July 2019</td> </tr> <tr> <td>AU254070</td> <td>Letter of SOCSO referred CAN07201900042922</td> <td>Start 1 July 2019</td> </tr> <tr> <td>QL1793763</td> <td>W/19/WF01/067872/K UL (Lonpac Insurance BHD)</td> <td>1 Jan 2019 – 31 Dec 2019</td> </tr> </tbody> </table>	Workers Id	Policy no	validity	AT736205	Letter of SOCSO referred CAN07201900041959	Start 1 July 2019	AU254070	Letter of SOCSO referred CAN07201900042922	Start 1 July 2019	QL1793763	W/19/WF01/067872/K UL (Lonpac Insurance BHD)	1 Jan 2019 – 31 Dec 2019	Complied
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4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>All the injuries were recorded using the Total Accident/Incidents with and without lost days report. The statistics for 2019 year-to date is as follows:</p> <table border="1" data-bbox="1014 1161 1606 1310"> <thead> <tr> <th>Year/Unit</th> <th>GBSE</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>3 accident</td> </tr> <tr> <td>2019 (Todate)</td> <td>2 accident</td> </tr> </tbody> </table>	Year/Unit	GBSE	2018	3 accident	2019 (Todate)	2 accident	Complied						
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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 -	<p>The annual training program has been established and significantly covers all aspects of the RSPO requirements. There were also additional subjects including the estate operating procedures, parameters of FFB, machinery maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects. The program mainly covers both requirement of the estate. The subjects for the training are issued and assisted by the Sustainability Department. The following topics included in the annual training program 2019 was updated on 11/7/19 among others as shown below;</p> <table border="1" data-bbox="1014 719 1854 1382"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">(Mill ) subject</th> <th colspan="3">schedule</th> </tr> <tr> <th>1-4</th> <th>5-9</th> <th>9-12</th> </tr> </thead> <tbody> <tr><td>1</td><td>Requirement ISCC/RSPO/MSPO</td><td>/</td><td></td><td></td></tr> <tr><td>2</td><td>ESH policy objective, target &amp; program</td><td>/</td><td></td><td></td></tr> <tr><td>3</td><td>New FW – procedure</td><td>/</td><td></td><td></td></tr> <tr><td>4</td><td>Duties of Field Supervisor</td><td>/</td><td></td><td></td></tr> <tr><td>5</td><td>ESH role &amp; function</td><td>/</td><td></td><td></td></tr> <tr><td>6</td><td>Competency, training &amp; awareness</td><td>/</td><td></td><td></td></tr> <tr><td>7</td><td>ERP procedure and evacuation</td><td></td><td>/</td><td></td></tr> <tr><td>8</td><td>Legal &amp; other requirement</td><td></td><td>/</td><td></td></tr> <tr><td>9</td><td>Permit to work/handling of tools equipment</td><td>/</td><td></td><td></td></tr> <tr><td>10</td><td>HIRARC &amp; EAI</td><td></td><td>/</td><td></td></tr> <tr><td>11</td><td>Non Conformity corrective preventive action</td><td></td><td>/</td><td></td></tr> <tr><td>12</td><td>Complaint &amp; grievance procedure</td><td></td><td>/</td><td></td></tr> <tr><td>13</td><td>SOP &amp; ECP for individual procedure</td><td></td><td>/</td><td></td></tr> <tr><td>14</td><td>PPE adherence</td><td></td><td>/</td><td></td></tr> <tr><td>15</td><td>FFB qualities – standing instruction</td><td></td><td></td><td>/</td></tr> </tbody> </table>		(Mill ) subject	schedule			1-4	5-9	9-12	1	Requirement ISCC/RSPO/MSPO	/			2	ESH policy objective, target & program	/			3	New FW – procedure	/			4	Duties of Field Supervisor	/			5	ESH role & function	/			6	Competency, training & awareness	/			7	ERP procedure and evacuation		/		8	Legal & other requirement		/		9	Permit to work/handling of tools equipment	/			10	HIRARC & EAI		/		11	Non Conformity corrective preventive action		/		12	Complaint & grievance procedure		/		13	SOP & ECP for individual procedure		/		14	PPE adherence		/		15	FFB qualities – standing instruction			/	<p>Complied</p>
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4.8.2	Records of training for each employee shall be maintained. - Minor compliance -	<p>Bulk of the estate training is organized during the daily briefing prior to work commencement. Mainly the issues discussed / briefed were related to estate daily operations and safety compliance. These training records are maintained in a separate book and were sighted during the audit. The supervisor /mandores similarly hold training during muster and on ad hoc basis as per the work category grouping.</p> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>18/7/19</td> <td>Briefing of Company's Policies</td> <td>entire</td> </tr> <tr> <td>2</td> <td>16/7/19</td> <td>ESH committee members role</td> <td>15</td> </tr> <tr> <td>3</td> <td>11/6/19</td> <td>Maintenance – SIME KUBOTA</td> <td>14</td> </tr> <tr> <td>4</td> <td>17/7/19</td> <td>Continuous improvement plan</td> <td>6</td> </tr> <tr> <td>5</td> <td>15/7/19</td> <td>PPE adherence</td> <td>entire</td> </tr> <tr> <td>6</td> <td>15/7/19</td> <td>Buffer zone management</td> <td>Entire</td> </tr> <tr> <td>7</td> <td>27/6/18</td> <td>HCV briefing</td> <td>Entire</td> </tr> <tr> <td>8</td> <td>4/4/19</td> <td>IPM briefing</td> <td>9</td> </tr> <tr> <td>9</td> <td>16/7/19</td> <td>Harvesting operations</td> <td>27</td> </tr> </tbody> </table>					Date	Subject	Attendees	1	18/7/19	Briefing of Company's Policies	entire	2	16/7/19	ESH committee members role	15	3	11/6/19	Maintenance – SIME KUBOTA	14	4	17/7/19	Continuous improvement plan	6	5	15/7/19	PPE adherence	entire	6	15/7/19	Buffer zone management	Entire	7	27/6/18	HCV briefing	Entire	8	4/4/19	IPM briefing	9	9	16/7/19	Harvesting operations	27	Complied
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		10	12/1/19	Harvesting /pruning	10	
		11	15/7/19	Fire briefing/talk & fire drill	entire	
		12	20/6/19	CPR – First Aid Response	6	
		13	11/4/19	Chemical spillage /Mixing ERP	15	
		14	12/7/19	Fire drill	Entire	
		15	27/3/19	LF collection / SSOP	20	
		16	29/3/19	Empty pesticide container SOP	Entire	
		17	29/3/19	SW/waste management/oil trap	Entire	
		18	30/10/18	Fire prevention	entire	
		19	26/4/19	Induction program for new workers	17	
		20	9/1/19	Security operations	24	
		21	28/3/19	ISCC awareness to contractors /vendors	30	
<b>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</b>						
<b>Criterion 5.1:</b> 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.						
5.1.1	An environmental impact assessment (EIA) shall be documented. - Major compliance -	The impact assessment was conducted internally based on activities of the estate. The last review of the assessment was conducted on 05/7/2019. The impact assessment has identified the positive and negative impacts. Activities verified among others : a) Pesticide spraying has identified the possible contamination to land and water course. The mitigation plan is to manage no chemical application at riparian zone. Signage and marking has been implemented.				Complied

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		<p>b) Replanting activities has identified possible erosion. The mitigation plan is to plant cover crop as soon as the old palms are felled.</p> <p>The estate had established its environmental aspects / impacts register associated with their activities. The assessment report is compiled to describe the following information;</p> <ul style="list-style-type: none"> <li>a) Aspect, impacts type / Legal requirement</li> <li>b) Evaluation &amp; significance / Mitigation &amp; control measures</li> <li>c) Procedure and monitoring / Training / communication</li> <li>d) Person In Charge &amp; Time line</li> </ul> <p>The estates recent environment aspect impact assessment was reviewed on 05/7/19 to cover all activities from harvesting, pest and disease, upkeep programme until delivery to mill. The main purpose of this assessment was to evaluate and analyse impact on soil, water, and air associated with the organization activities. Among others the environment aspects assessed were;</p> <table border="1"> <thead> <tr> <th></th> <th>Activities</th> <th></th> <th>Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pesticide application</td> <td>8</td> <td>Landfill / catchment</td> </tr> <tr> <td>2</td> <td>Spraying -residential areas</td> <td>9</td> <td>Int &amp; ext transport,</td> </tr> <tr> <td>3</td> <td>Fertiliser application, EFB,</td> <td>10</td> <td>HCV areas</td> </tr> <tr> <td>4</td> <td>Harvesting activities</td> <td>11</td> <td>Nursery</td> </tr> <tr> <td>5</td> <td>Chemical, fertiliser stores</td> <td>12</td> <td>replanting</td> </tr> <tr> <td>6</td> <td>Diesel tank &amp; gen stores</td> <td>13</td> <td>loading ramp</td> </tr> <tr> <td>7</td> <td>residential areas</td> <td>14</td> <td>SW handling /despatch</td> </tr> </tbody> </table>		Activities		Activities	1	Pesticide application	8	Landfill / catchment	2	Spraying -residential areas	9	Int & ext transport,	3	Fertiliser application, EFB,	10	HCV areas	4	Harvesting activities	11	Nursery	5	Chemical, fertiliser stores	12	replanting	6	Diesel tank & gen stores	13	loading ramp	7	residential areas	14	SW handling /despatch	
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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.	<p>There were two (2) Management Plans developed.</p> <ul style="list-style-type: none"> <li>a) Environment Improvement &amp; Management Plan 2019. This is in place with the recent review on 25/07/2019.</li> </ul>	Complied																																



Criterion / Indicator	Assessment Findings	Compliance
	<p>The management plan shall identify the responsible person/persons.                      - Minor compliance -</p>	<p>b) Management plan incorporated in the EAI for the specific activities. The estates made no major changes to the environmental aspects and impacts or current practices which require changes in the environmental action plans. On a continual basis the existing environmental action plans had identified timeframes and responsible person at each operating unit assessed.                       This being discussed during the OSH meeting and Management Review</p>
5.1.3	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.                      - Minor compliance -</p>	<p>The monitoring protocols are incorporated in both the management plans which are reviewed once a year. The landfill selection (located at field no P2005) are based on identification my assistant manager and estate manager. Based on interview, the selection process of the site is consistent with the <i>Landfill and Domestic Waste Management procedure dated 01/12/2014</i>. The estate made initiatives to minimize chemical usage in the following identified activities among others:</p> <ul style="list-style-type: none"> <li>a) to reduce usage of insecticide and pesticide (<i>cypermethrin</i>) by                             <ul style="list-style-type: none"> <li>- Prevention of pest breeding area by doing good agricultural practices during replanting – ensuring thin chipping of trunks and all trunk debris must stack in close ended trenches.</li> </ul> </li> <li>b) Effective implementation of IPM practices through planting of beneficial plant.</li> <li>c) to reduce usage of rat bait by establishing and maintenance of barn owl boxes.</li> <li>d) Monitoring Water course                             <ul style="list-style-type: none"> <li>- Scheduled water quality monitoring for detection of contamination</li> </ul> </li> </ul>
<p><b>Criterion 5.2:</b>                      The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p>		

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5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance -	<p>The HCV assessment for Northern Region (including Genting Bukit Sembilan estate) was conducted by <i>Dr Yap Son Kheong</i> in March 2010. The HCV assessment has included the inventory of the flora and fauna that is present in the <i>Genting Bukit Sembilan Estate</i> (including the outline division Paya Kamunting).</p> <table border="1"> <thead> <tr> <th>Division</th> <th>HCV 1.4</th> <th>HCV 4</th> <th>HCV 6</th> </tr> </thead> <tbody> <tr> <td>1 Bukit Sembilan</td> <td>-</td> <td>4.2</td> <td>6</td> </tr> <tr> <td>2 Paya Kamunting</td> <td>-</td> <td>-</td> <td>6</td> </tr> </tbody> </table> <p>The recommended management measures is listed below.</p> <table border="1"> <thead> <tr> <th></th> <th>HCV</th> <th>Element</th> <th>Status</th> <th>Management measures</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>1.4</td> <td>Critical temporal use</td> <td>This being removed</td> <td>This being removed</td> </tr> <tr> <td>2</td> <td>4.2</td> <td>Forest critical to erosion control</td> <td>Steep sites &amp; rocky outcrops &amp; riparian buffer belts</td> <td>Protection of steep area by prescribing no disturbance to the vegetation and no planting for next cycle.</td> </tr> <tr> <td>3</td> <td>6.0</td> <td>Forest areas critical to local communities traditional cultural identity</td> <td>Temple and burial grounds for local communities within estates.</td> <td>Erect signages indicating HCV values. Demarcate on maps and on</td> </tr> </tbody> </table>				Division	HCV 1.4	HCV 4	HCV 6	1 Bukit Sembilan	-	4.2	6	2 Paya Kamunting	-	-	6		HCV	Element	Status	Management measures	1	1.4	Critical temporal use	This being removed	This being removed	2	4.2	Forest critical to erosion control	Steep sites & rocky outcrops & riparian buffer belts	Protection of steep area by prescribing no disturbance to the vegetation and no planting for next cycle.	3	6.0	Forest areas critical to local communities traditional cultural identity	Temple and burial grounds for local communities within estates.	Erect signages indicating HCV values. Demarcate on maps and on	Complied
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<p>5.2.3</p>	<p>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.</p> <p>- Minor compliance -</p> <p>Continuous training has been organized to educate employees in relation to HCV areas / RTE species. Among others as shown below</p> <table border="1" data-bbox="1014 786 1830 1023"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>18/7/19</td> <td>Briefing of Company's Policies</td> <td>entire</td> </tr> <tr> <td>2</td> <td>17/7/19</td> <td>Continuous improvement plan</td> <td>6</td> </tr> <tr> <td>3</td> <td>15/7/19</td> <td>Buffer zone management</td> <td>Entire</td> </tr> <tr> <td>4</td> <td>27/6/18</td> <td>HCV briefing</td> <td>Entire</td> </tr> <tr> <td>5</td> <td>26/4/19</td> <td>Induction program for new workers</td> <td>17</td> </tr> </tbody> </table> <p>During the field assessment, the signage was installed as a notice and reminders for the workers. There were programs held by the estate to the employees in pertaining to the awareness of HCV areas and RTE species. Interview with the employees concluded that training and briefing made during the ad hoc session and morning muster. This is also emphasized during the training held by the Sustainability Unit programs. Employees are aware of the following reminders;</p> <p>a) An offence to capture, harm, kills any wildlife.</p> <p>b) Disciplinary measures shall be taken if found violating company rules.</p>		Date	Subject	Attendees	1	18/7/19	Briefing of Company's Policies	entire	2	17/7/19	Continuous improvement plan	6	3	15/7/19	Buffer zone management	Entire	4	27/6/18	HCV briefing	Entire	5	26/4/19	Induction program for new workers	17	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>c) Riparian buffer zone to be free from any chemicals application/pollution</li> <li>d) Relevant signs <i>NO HUNTING NO FELLING ALLOWED</i></li> </ul>	
5.2.4	<p>Where a management plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> <li>• The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>• Outcomes of monitoring shall be fed back into the management plan.</li> </ul> <p>- Minor compliance -</p>	<p>HCV monitoring checklist has been established to monitor the status of the HCV and RTE according to the recommendation of the HCV assessment report.</p> <ul style="list-style-type: none"> <li>d) The monitoring includes present of the wildlife, encroachment, protection of flora and ensure all signage are in good conditions.</li> <li>e) The last monitoring was conducted on 26/06/2018 for Bukit Sembilan main division. The outcome of the monitoring was reviewed with the Estate Managers.</li> <li>f) The monitoring results are reflective to the management plan.</li> </ul> <p>The CU observed implemented the established action plans, including monitoring (patrolling) of the conservation areas by Auxiliary Police. Records of monitoring (patrolling) are maintained. There is no monitoring outcome that requires changed of practices or action plan.</p>	Complied
5.2.5	<p>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.</p> <p>- Minor compliance -</p>	<p>This indicator is not applicable. There was no HCV set asides with existing rights of local communities. This has been confirmed during the stakeholders' consultation.</p>	Complied
<p><b>Criterion 5.3:</b>  Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p>			
5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>All waste and pollution are identified and documented in the <i>Waste Management Plan and Pollution Prevention Plan 2019</i> recently reviewed on 05/4/2019. The common waste generated from the estate operations is shown below;</p>	Complied

Criterion / Indicator		Assessment Findings		Compliance																		
			<table border="1"> <thead> <tr> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1 Scheduled waste</td> <td>filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td>2 Domestic waste</td> <td>rubbish from the estate complex and employees' quarters</td> </tr> <tr> <td>3 Industrial waste</td> <td>scrap iron</td> </tr> <tr> <td>4 Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table> <p>The pollution identified from the estate activities among others</p> <table border="1"> <thead> <tr> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1 Black smoke</td> <td>Emission from tractors</td> </tr> <tr> <td>2 Lubricant leakage</td> <td>Storage &amp; vehicle maintenance</td> </tr> <tr> <td>3 Chemical leakage</td> <td>Store and during mixing activities</td> </tr> </tbody> </table>	Type of waste	Details	1 Scheduled waste	filter, lubricants, hydraulic oil, grease, used batteries	2 Domestic waste	rubbish from the estate complex and employees' quarters	3 Industrial waste	scrap iron	4 Sewage	Sewage from housing/office complex	Type of waste	Details	1 Black smoke	Emission from tractors	2 Lubricant leakage	Storage & vehicle maintenance	3 Chemical leakage	Store and during mixing activities	
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<p>5.3.2 All chemicals and their containers shall be disposed of responsibly.                      - Major compliance -</p>	<p>The identified wastes among others include empty chemical containers including pesticides containers.</p> <ul style="list-style-type: none"> <li>a) Empty pesticides containers were washed at washing station prior to disposal.</li> <li>b) Disposals were carried out in compliance with relevant regulation of scheduled waste.</li> <li>c) Inventory and consignment documents were sighted and verified.</li> </ul> <p>GBSE made the following SW despatches on 05/7/19</p> <table border="1" data-bbox="1126 751 1621 887"> <thead> <tr> <th></th> <th>Date</th> <th>SW type</th> <th>Quantity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>05/7/19</td> <td>SW305</td> <td>1 PLT</td> </tr> <tr> <td>2</td> <td>05/7/19</td> <td>SW409</td> <td>1 PLT</td> </tr> <tr> <td>3</td> <td>05/7/19</td> <td>SW410</td> <td>1 Pail</td> </tr> </tbody> </table> <p>The pesticide containers are collected by G-Planter. The following despatches were transacted on 10/7/19. Documents were sighted and verified.</p> <table border="1" data-bbox="1126 1050 1621 1153"> <thead> <tr> <th></th> <th>Date</th> <th>type</th> <th>Units</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>10/7/19</td> <td>4 litres</td> <td>109</td> </tr> <tr> <td>2</td> <td>10/7/19</td> <td>20 litres</td> <td>102</td> </tr> </tbody> </table>		Date	SW type	Quantity	1	05/7/19	SW305	1 PLT	2	05/7/19	SW409	1 PLT	3	05/7/19	SW410	1 Pail		Date	type	Units	1	10/7/19	4 litres	109	2	10/7/19	20 litres	102	<p>Complied</p>
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<p>5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.                      - Minor compliance -</p>	<p>The waste management and disposal plan is established titled as <i>Waste Management Plan and Pollution Prevention Plan 2019</i> recently reviewed on 05/4/2019. The management plan includes recycling of office papers, disposal of scheduled waste through licensed scheduled waste collector. The waste and disposal plan listed the waste generated from the estate operations is described below;</p>	<p>Complied</p>																												



Criterion / Indicator		Assessment Findings					Compliance	
		Type	Description	Action to be taken	PIC	Status		
		1	EFB	EFB are applied as mulch in the estates. To ensure no open burning activity	AM/FS	On-going practices		
		Industrial waste	Scrap iron	Dispose as sale to assigned vendor by Head Office. Recycle where appropriate for vehicle maintenance	AM/FS	On-going practices		
		2	S Waste	SW305 SW306 SW410	Clean and tidy storage area Separation of type SW using labels 10cm x 10cm To ensure spillage trap functions effectively Monthly stock verification by executives Ensure inventory not exceeding 180 days / 20 mt Follow approved consignment note and update in ESWIS	AM/FS	On-going practices	

Criterion / Indicator		Assessment Findings				Compliance
				training to the SW handlers Disposal to <i>Kualiti Alam Sdn Bhd</i>		
		Domestic Waste	Rubbish/ garden waste	Disposal made 3x /week Encourage 3R program – disposal in landfill. Provide adequate dustbins line sites /office complex Weekly inspection by HA/exec Awareness on hygiene.	AM/FS HA	On-going practices
			Sewage	Provide adequate washrooms/ toilets at office and line sites To ensure employees' quarters equipped with appropriate septic tank Cleaning/desludging septic tank by appointed contractor.	AM/FS	On-going practices
		Recycle able waste		<i>M/s Kualiti Idaman</i> to collate in a bin to incorporate both domestic and recyclable waste	AM/FS /HA	Subject to adequate stock

Criterion / Indicator		Assessment Findings				Compliance																														
<b>Criterion 5.4:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised.																																				
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 -	A plan has been established to improve the efficiency of the use of fossil fuels incorporated in the <i>Environmental Aspect and Impact Assessment Register 2019</i> with the latest revision dated 20/7/19. <table border="1" style="margin-top: 10px;"> <thead> <tr> <th colspan="5">Diesel usage efficiency and optimisation renewable energy</th> </tr> <tr> <th></th> <th>Concern</th> <th>Management Plan</th> <th>Timelines</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Diesel usage</td> <td>to carry out scheduled maintenance for machineries to ensure diesel and lubricant usage is at optimal level and in good condition.</td> <td>Done /in progress</td> <td>Manager/Div Assistant</td> </tr> <tr> <td></td> <td></td> <td>to brief workers during muster briefing on how to reduce diesel usage. Example turn off engine when not in used.</td> <td>Done /in progress</td> <td>Manager/Div Assistant</td> </tr> <tr> <td></td> <td></td> <td>to carry out road maintenance programme as planned to ensure it is always in good condition to ease tractor movement</td> <td>Done /in progress</td> <td>Manager/Div Assistant</td> </tr> <tr> <td>2</td> <td>GHG emission</td> <td>Optimum diesel consumption by farm</td> <td>Done / in progress</td> <td>Manager/Div Assistant</td> </tr> </tbody> </table>				Diesel usage efficiency and optimisation renewable energy						Concern	Management Plan	Timelines	PIC	1	Diesel usage	to carry out scheduled maintenance for machineries to ensure diesel and lubricant usage is at optimal level and in good condition.	Done /in progress	Manager/Div Assistant			to brief workers during muster briefing on how to reduce diesel usage. Example turn off engine when not in used.	Done /in progress	Manager/Div Assistant			to carry out road maintenance programme as planned to ensure it is always in good condition to ease tractor movement	Done /in progress	Manager/Div Assistant	2	GHG emission	Optimum diesel consumption by farm	Done / in progress	Manager/Div Assistant	Complied
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			tractors & mini tractors/grabbers																																	
		3 Diesel usage/mt FFB	High crop 3000-3600 mt at 2.30L/FFB mt	Done /in progress	Manager/Div Assistant																															
<p>The estate maintained records for the diesel consumption.</p> <table border="1"> <thead> <tr> <th></th> <th>2015</th> <th>2016</th> <th>2017</th> <th>2018</th> <th>2019 (June 19)</th> </tr> </thead> <tbody> <tr> <td>FFB processed mt</td> <td>3185 0</td> <td>2117 1</td> <td>3030 6</td> <td>2287 8</td> <td>17411</td> </tr> <tr> <td>Diesel – estate L</td> <td>1825 8</td> <td>2327 6</td> <td>3212 7</td> <td>3112 0</td> <td>10090</td> </tr> <tr> <td>Diesel – contractor L</td> <td>7389 0</td> <td>5000 0</td> <td>7031 0</td> <td>3432 0</td> <td>17160</td> </tr> <tr> <td>Diesel /FFB</td> <td>2.89</td> <td>3.46</td> <td>3.38</td> <td>2.86</td> <td>1.57</td> </tr> </tbody> </table> <p>The estates have variation of crop trend and timing variance of the vehicles/machinery utilization. In addition the irregularity of the weather pattern also contributed to the diesel consumption differences.</p>								2015	2016	2017	2018	2019 (June 19)	FFB processed mt	3185 0	2117 1	3030 6	2287 8	17411	Diesel – estate L	1825 8	2327 6	3212 7	3112 0	10090	Diesel – contractor L	7389 0	5000 0	7031 0	3432 0	17160	Diesel /FFB	2.89	3.46	3.38	2.86	1.57
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<p><b>Criterion 5.5:</b>            Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>																																				
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	There was no land preparation in the Estates CU by burning ever since Genting Plantations practice zero burning as per the policy in the Zero Burning Policy dated 10/8/11 signed by the President & Chief Operating Officer. Therein stating a) No open burning of any kind in all OU b) All types of waste products disposed appropriately				Complied																														

Criterion / Indicator		Assessment Findings	Compliance																				
		c) Limited open burning allowed for cooking and religious purposes under appropriate supervision.																					
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	There is no use of fire for land preparation during replanting. Only mechanical machine will be used for felling and land preparation. There was no evidence that fire had been used to prepare land for replanting in all the estates. No fire was used for waste disposal.	Complied																				
<b>Criterion 5.6:</b> Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.																							
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 -	<p>The polluting activities are and type of pollutants and GHG emission has been identified in the Significant Pollutants and GHG Emission – Reduction / Minimization Plan dated 18/7/2019. Details among others as follows;</p> <table border="1"> <thead> <tr> <th></th> <th>Pollutant/ GHG Emission</th> <th>Management Plan</th> <th>Time line</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air /GHG emission Continuous running engine – CO2</td> <td>To educate drivers Scheduled vehicle maintenance Monitor diesel usage</td> <td>Dec 19</td> <td>Mgr</td> </tr> <tr> <td>2</td> <td>GHG Emission diesel – High diesel consumption</td> <td>Scattered harvesting to implement block harvesting optimizing vehicle utilization.</td> <td>On going</td> <td>Mgr/ AM</td> </tr> <tr> <td>3</td> <td>GHG Emission – usage of inorganic</td> <td>Cease application for field due for replanting.</td> <td>Mgr</td> <td>On going eff 2015</td> </tr> </tbody> </table>		Pollutant/ GHG Emission	Management Plan	Time line	PIC	1	Air /GHG emission Continuous running engine – CO2	To educate drivers Scheduled vehicle maintenance Monitor diesel usage	Dec 19	Mgr	2	GHG Emission diesel – High diesel consumption	Scattered harvesting to implement block harvesting optimizing vehicle utilization.	On going	Mgr/ AM	3	GHG Emission – usage of inorganic	Cease application for field due for replanting.	Mgr	On going eff 2015	Complied
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Criterion / Indicator		Assessment Findings				Compliance
		fertilizer N & CO2	Replacement with compound fertilizer saving cost, labor , tractors			
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	<p>The <i>Pollution Identification Environmental Improvement Action Plan</i> identifies the waste products / sources of pollution and actions taken to mitigate and reduce them. The Plan is being reviewed accordingly the recent being on 18/7/2019.</p> <ul style="list-style-type: none"> <li>a) The main source of GHG from this operation is CO2 from fossil fuel combustion and NO2 from fertilizer applications.</li> <li>b) The reduction plan for minimizing NO2 emission is to replace straight fertilizers with compound fertilizers</li> <li>c) Reduction on tractor usage by implementing clusters harvesting and systematic evacuation. The structure cluster harvesting was verified.</li> </ul> <p>Green House Gaseous – Potential sources are being identified using 'Carbon Inventory Calculation Methodology. Emission Sources have been identified from Land Conservation, Fertilizer (mineral), Manufacture &amp; Transport, NO from fertilizer, Fuel Consumption, and reported in the Palm GHG Summary Report.</p>				Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	<p>RSPO has made a compulsory for submitting GHG beginning 1/1/2017. All the <i>Genting Plantations Mill/Estates</i> had used RSPO Palm GHG v4.0 calculator as a tool. Records were maintained individually in the respective office. . The data inputs have been verified which had included the total diesel consumed for all activities within the operations and the tonnage of fertilizer consumed cross checked with the bin cards The final emissions value per product are as below:</p>				Complied

Criterion / Indicator		Assessment Findings				Compliance
		Estate	Total emission tCO2e	tCO2e/ha	tCO2e/FF B	Emission allocated to mill
		GBSE	4380.67	3.71	0.19	0
<b>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</b>						
<b>Criterion 6.1:</b> Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.						
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Social impact identified as per documented RSPO & MSPO Social Impact Assessment (SIA) and Human Rights Impact Assessment (HRIM) Report, Genting Bukit Sembilan Estate (GBSE); Date: 2-5/7/2019. Report prepared by Sustainability Department dated 12/7/2019. Sighted list of Internal Stakeholders and List of External Stakeholders updated as at 5/7/2019 identified amongst all are the local authorities, neighboring smallholders, villagers, schools, suppliers, contractors, customer, NGO and etc.  Latest external stakeholder consultation meeting was conducted on 17/4/2019 while consultation with internal (workers) stakeholders was conducted on 13/7/2019 for workers committee meeting and 15/4/2019 for women committee meeting.				Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Sighted list of Internal Stakeholders and List of External Stakeholders updated as at 5/7/2019 identified amongst all are the local authorities, neighboring smallholders, villagers, schools, suppliers, contractors, customer, NGO and etc.  Latest external stakeholder consultation meeting was conducted on 17/4/2019 while consultation with internal (workers) stakeholders was				Complied

Criterion / Indicator		Assessment Findings	Compliance										
		conducted on 13/7/2019 for workers committee meeting and 15/4/2019 for women committee meeting.											
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	<p>Social impact identified as per documented RSPO &amp; MSPO Social Impact Assessment (SIA) and Human Rights Impact Assessment (HRIM) Report, Genting Bukit Sembilan Estate (GBSE); Date: 2-5/7/2019. Report prepared by Sustainability Department dated 12/7/2019. The SIA study summarize few key areas findings as following samples:</p> <table border="1"> <thead> <tr> <th>SIA Key Areas</th> <th>Findings</th> </tr> </thead> <tbody> <tr> <td>Economic livelihood/quality of life</td> <td>- Minimum wage &amp; basic facilities met - No land disputes except for presence of squatters "allowed" to stay within estate land - Local young generation not interested to work in plantation</td> </tr> <tr> <td>Environment</td> <td>No complaints &amp; noncompliance of environmental issue</td> </tr> <tr> <td>Health &amp; wellbeing</td> <td>- Health screening prior to employment/FOMEMA compliance</td> </tr> <tr> <td>Community, families and individuals</td> <td>- No issue</td> </tr> </tbody> </table>	SIA Key Areas	Findings	Economic livelihood/quality of life	- Minimum wage & basic facilities met - No land disputes except for presence of squatters "allowed" to stay within estate land - Local young generation not interested to work in plantation	Environment	No complaints & noncompliance of environmental issue	Health & wellbeing	- Health screening prior to employment/FOMEMA compliance	Community, families and individuals	- No issue	Complied
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6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The latest established Social Management and Monitoring Plan of Genting Bukit Sembilan Estate (GBSE) were updated on 23/7/2019 which includes the procedures and responsibilities for implementation. The plan established was based on consultation with external stakeholder from meeting latest conducted on 17/4/2019 together with consultation with internal (workers) from meetings conducted on 13/7/2019 for workers committee and 15/4/2019 for women committee.	Complied										



Criterion / Indicator		Assessment Findings	Compliance
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No smallholder schemes involved within the Genting Bukit Sembilan certification unit.	Not applicable
<b>Criterion 6.2:</b> There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	Implemented based on Sustainability Management Procedure for Consultation and Communication; SMP-GPB-17; Rev. 02; Date: 23/2/2018. Consultation & communication done through meetings, dialogs, engagement to both internal & external stakeholders and recorded in Genting Plantations Complaints/Grievance Record Book – Estate: GBSE.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	Letter of Appointment as Sustainability Coordinator for ISCC, RSP0 and MSPO Related Matters; dated 18/7/2019. Appointed person: Assistant Manager; by Manager GBSE	Complied
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	Genting Bukit Sembilan Estate List of stakeholders as at 5/7/2019 was maintained together with records of all communication as per sighted in Enquiry Register Book and Complaints/Grievances Record Book. Sighted complaints mostly received from internal stakeholders on housing repair issue. Last external complaints received from neighbour smallholder (ref. # 123; dated 1/11/2018) complaining on dying palm tree near her house which was taken action by estate management to fell the tree. Complainants satisfied by acknowledging issue resolved on 8/11/2018.	Complied
<b>Criterion 6.3:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			
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.	The system established based on Sustainability Management Procedure Manual Title: Complaints and Grievance; Doc. # SMP-GPB-19; Rev. 03; Issue date: 21/3/2018 and other relevant procedure including Procedure on Conflict Resolution and Handling of Negotiations and Compensation	Complied

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

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Within GENP Estates; Doc. # SMP-GPB-18; Rev. 03; Issue date: 29/3/2017	
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance -	GBSE has implemented Complaints/Grievances Record Book. Any complaints related to housing and workers issue were recorded in the complaint book. Linesite Maintenance Book was implemented as well to record any break down or malfunction in the workers' quarters.	Complied
<b>Criterion 6.4:</b> 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.			
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 -	Procedure in place entitled Procedure on Conflict Resolution and Handling of Negotiations and Compensations Within GENP Estates; Doc. # SMP-GPB-18; Rev. # 03; Issue date: 29/12/2017.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	The same procedure in use i.e. Procedure on Conflict Resolution and Handling of Negotiations and Compensations Within GENP Estates; Doc. # SMP-GPB-18; Rev. # 03; Issue date: 29/12/2017.	Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	The records of a resolution has arrived on the prolonged issue of squatter within Genting Bukit Sembilan Estate. From a minutes of meeting dated 3/5/2019, a settlement was agreed between the squatter and estate management that the following term were to be followed: - Squatter cannot extend existing house or construct additional house or expand the boundary of area squatted	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>- Squatter allowed to continue occupy existing squatted Genting Plantation Berhad land but not allowed to hand over or inherit the area to anyone including family member</p> <p>- The occupied area need to be surrender back to Genting Plantation Berhad when no longer use</p> <p>The terms were agreed upon and signed by the estate management on 6/5/2019 and by squatter on 28/5/2019.</p>	
<p><b>Criterion 6.5:</b>            Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.</p>			
6.5.1	Documentation of pay and conditions shall be available. - Major compliance -	<p>Documentations of pay and conditions available with salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker.</p> <p>Workers interviewed confirmed that they are being paid more than the stipulated minimum wage and that they understand all the deductions being made.</p> <p>Sampled 3 months' payslip (Aug 18, Nov 18 and Apr 19) for:</p> <ul style="list-style-type: none"> <li>- Employee # 26709; Joined date: 6/1/2018; Post: Harvester</li> <li>- Employee # 02559; Joined date: 10/1/2019; Post: Harvester</li> <li>- Employee # 26697; Joined date: 28/5/15; Post: Weeder</li> <li>- Employee # 26708; Joined date: 6/1/2018; Post: Weeder</li> <li>- Employee # 02540; Joined date: 21/2/2018; Post: Harvester</li> <li>- Employee # 02407; Joined date: 8/5/2003; Post: Weeder</li> <li>- Employee # 02436; Joined date: 3/7/2012; Post: Weeder</li> <li>- Employee # 02537; Joined date: 2/2/2018; Post: Harvester</li> <li>- Employee # 02472; Joined date: 5/10/2011; Post: Harvester</li> <li>- Employee # 02533; Joined date: 14/11/2017; Post: Harvester</li> </ul>	Complied
6.5.2	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	Employment contracts for checkroll and contract workers were acknowledged and kept a copy by the workers verified through interviewed with the workers. The contract was in the language that understood by the workers. The terms and conditions were clearly	Complied

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

Criterion / Indicator	Assessment Findings	Compliance
	<p>for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p>	
6.5.3	<p>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.</p> <p>- Minor compliance –</p>	Complied
6.5.4	<p>Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p>	Complied
<p><b>Criterion 6.6:</b>            The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>		
6.6.1	<p>A published statement in local languages recognising freedom of association shall be available.</p> <p>- Major compliance -</p>	Complied

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

Criterion / Indicator		Assessment Findings	Compliance
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Documented minutes of meeting records available as per Report on Internal Stakeholder Consultation and Communication Meeting MSPO/RSPO & ISCC Principles and Criteria; Dated 17/4/19.	Complied
<b>Criterion 6.7:</b> Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	There is a Genting Plantations Social Policy on Child Protection dated on 22/06/2015. During site visit to field and line site, there was no evidence found of workers below 18 years old. Workers are aware of the minimum age policy is being strictly enforced by the management at which the age limit is above 18 years old.	Complied
<b>Criterion 6.8:</b> Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	The Genting Plantations Group "People Policy" signed by Mr Yong Chee Kong, CEO dated 03/08/2017 clearly states that no one shall be denied of their rights, freedom of association and equal opportunities.	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Verified the LintraMax system and payslips found that the company has recruited male and female workers, local and foreign workers. They were treated equally without any discrimination. They were paid according to legal requirements. Interviewed with the female and male workers confirmed that they were allowed to transfer to other work stations if they found they are unfit for the job.	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 -	Genting Plantations Berhad has developed Manpower Recruitment and Orientation, Doc. No. PM-MR-02, Rev. 0 dated 2/1/2018. The procedure has clearly stated the selection of recruitment and hiring process, promotion of the employees internally before recruit for new employees. The recruitment was also based on the medical report for the fitness to work.	Complied

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 6.9:</b>			
There is no harassment or abuse in the work place, and reproductive rights are protected.			
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 developed Sexual Harassment Policy dated 3/8/2009 where the company strives for a harassment-free environment and avoid behaviour that may create an atmosphere of hostility and intimidation of any kind at the workplace. The policy has been briefed to all the workers during induction training. A committee of women employee was established as per sighted Appointment Letter (Surat lantikan) – as Women Committee Chairman Member dated 1/2/2017 (Chief Clerk). Communication done from time to time directly and indirectly including in the latest meeting with woman association in GBSE was done on 15/4/2019 as per “Minit Mesyuarat Persatuan Wanita Dan Kanak-Kanak” sighted.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	Communication done from time to time directly and indirectly including in the latest meeting with woman association in GBSE was done on 15/4/2019 as per “Minit Mesyuarat Persatuan Wanita Dan Kanak-Kanak” 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 -	Genting Plantations Berhad has developed Procedure on Prevention and Eradication of Sexual Harassment at the Workplace with Doc. No. SMP-GPB-20, Rev. 0 dated 11/10/2013. The procedure has clearly stated the forms of sexual harassment such as verbal, non-verbal, visual, psychological and physical harassment. Specific grievance investigations done through Women & Children Committee (Sexual Harassment) Organization Chart where Chief Clerk is the chairman and office clerk is the secretary.	Complied
<b>Criterion 6.10:</b>			
Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.	Pricing mechanism for FFB is not applicable because the FFB sourced is from own company estates.	Complied

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

Criterion / Indicator	Assessment Findings	Compliance
<p>6.10.2</p> <p>- Minor compliance -</p> <p>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).</p> <p>- Major compliance -</p>	<p>There is no smallholder dealing with the palm oil mill. Pricing mechanism for FFB is not applicable because the FFB sourced is from own company estates.</p> <p>However, for harvesting contractor pricing, mechanisms were established as per Fresh Fruit Bunch (FFB) Harvesting Agreement as following samples:</p> <ul style="list-style-type: none"> <li>- Agreement for Fresh Fruit Bunch (FFB) Harvesting (GBSE/HC/19/01/02), dated 1/1/2019 with Megatani Utara Enterprise</li> <li>- Agreement for loading and transporting of Fresh Fruit Bunch (FFB) and Loose Fruit (GBSE/TR/19/01/01), dated 1/1/2019 with J.M Enterprise.</li> </ul> <p>The contract specified contractors to be in compliance with RSPO requirements included in Para 2.6 of both contracts.</p>	<p>Complied</p>
<p>6.10.3</p> <p>Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p>- Minor compliance -</p>	<p>Based on sample agreements of above indicator and the interview with contractor, the contractual agreements confirmed to be understood by all parties and fair, legal as well as transparent.</p>	<p>Complied</p>
<p>6.10.4</p> <p>Agreed payments shall be made in a timely manner.</p> <p>- Minor compliance -</p>	<p>Agreed payments were made timely as per sample payments sighted:</p> <ul style="list-style-type: none"> <li>- Cheque voucher # 06/07; Contractor: Megatani Utara Enterprise; Date: 5/7/2019</li> <li>- Invoice No: # GBSECI00000296; Contractor: JM Enterprise; Date: 30/6/2019</li> </ul>	<p>Complied</p>
<p><b>Criterion 6.11:</b>            Growers and millers contribute to local sustainable development where appropriate.</p>		
<p>6.11.1</p> <p>Contributions to local development that are based on the results of consultation with local communities shall be demonstrated.</p> <p>- Minor compliance -</p>	<p>Contributions made based on consultation. Sample contribution as per CSR Summary:</p> <ul style="list-style-type: none"> <li>- Donation to SJK(T) Bukit Sembilan Estate for Merdeka Celebration program</li> <li>- Upkeep of school area for SJK(T) Bukit Sembilan Estate</li> </ul>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		- Provision of chicken for Hari Raya celebration - Knowledge sharing session with UiTM students	
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	Not applicable as there was no scheme smallholder involved in the certification unit.	Not applicable
<b>Criterion 6.12:</b> No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	The company has recruited all the employees with legal identification for local and valid passport and work permit for foreign workers and contract workers. Contract of employment was signed by the workers prior to work.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	Verified documents and interview with the foreign workers from Indonesia, India, Bangladesh, Nepal and Pakistan confirmed that no contract substitution has occurred. The terms and conditions stated in the agreement they signed in home country were the same as they signed in Genting Plantations Berhad.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Genting Plantations Berhad has developed Procedures for Social Management, Doc. No. SMP-GPB-32, Rev. 0, dated 18/1/2018. The procedure has clearly outlined the practices of the company such as no contract of substitution for the foreign workers, provide reasonable and safe living condition to all the employees, post arrival orientation will be provided to brief on terms and conditions, safety & health, national and state laws and regulations and no discrimination to all the workers.	Complied
<b>Criterion 6.13:</b> Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	Genting Plantations Berhad has developed and implemented the Social Policy (Incorporating Special Labour and Human Rights requirements); Rev. 00; Date: 22/6/2015	Complied



Criterion / Indicator		Assessment Findings	Compliance
		Policy available in dual language (BM & English) and signed Genting Plantations Berhad President & COO. Latest briefing on Understanding & Awareness of Group Policies was conducted by GBSE management to all employees on 18/7/19.	
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.	Not applicable for Peninsular Malaysia.	Not applicable
<b>Principle 7: Responsible development of new plantings (if applicable)</b>			
Genting Bukit Sembilan Estate Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during the annual surveillance assessment. The immature areas are replanted area.			
<b>Principle 8: Commitment to continual improvement in key areas of activity</b>			
<b>Criterion 8.1:</b> <b>Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.</b>			

<p>8.1.1</p>	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of pesticides(Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);</li> <li>• Optimising the yield of the supply base.</li> </ul> <p>- Major compliance -</p>	<p><i>Reduction in use of pesticides (Criterion 4.6);</i>  The estate adopted several continuous improvements in reducing of pesticides i.e. increasing planting of beneficial plants mainly <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i>.</p> <ol style="list-style-type: none"> <li>a) The estate also adopted planting of <i>Leguminious</i> Cover Crop mainly <i>Pueraria Javanica</i> and <i>Calopogonium Mucunoides</i> at replanting area to minimize circle and selective weeding.</li> <li>b) Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced encouraging soft grasses in inter row and frond stacking area.</li> <li>c) Mills wastes such as EFB were used as fertilizer in the selected fields where the application is economically viable.</li> </ol> <p><i>Environmental impacts (Criteria 4.3, 5.1 and 5.2);</i>  Environmental impact assessment, management action plans and continuous improvement plan for the estate has been updated and monitored by management. Among others the improvement actions:</p> <ol style="list-style-type: none"> <li>a) Construction of sump at chemical and workshop to prevent ground or water contamination.</li> <li>b) Collect back chemicals bags and allocate store for control of misused.</li> <li>c) use of tray for tractor parking to prevent ground contamination</li> </ol> <p><i>Waste reduction (Criterion 5.3);</i>  The management had plan to reduce emission by daily inspection and monitoring for their farm tractors / lorries to prevent any leakage and problem which can impact on smoke emission.</p> <p><i>Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</i>  The management of the estate had plan to reduce emission by daily inspection and monitoring for their farm tractors/ lorries to prevent any leakage and problem which can impact on smoke emission</p>	<p>Complied</p>
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		<p><i>Optimising the yield of the supply base.</i>          The yield performance has always been the top priority in ensuring long-term economic and financial viability. In general, various efforts to optimise the yield of the plantation among others</p> <ul style="list-style-type: none"> <li>a) maximizing crop recovery,</li> <li>b) optimum ripeness standard (harvest ripe bunches only and 100% loose fruit collection),</li> </ul> <p>the soil fertility were maintained and planting only high yielding planting material</p>	
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**RSPO Public Summary Report**  
**Revision 8 (Mar /2019)**

**Appendix B: Approved Time Bound Plan**

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

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

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

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

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	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 Cemerlang (70%)	AAC 1 & 2				NPP In Progress. HCV report being reviewed at HCVRN.
		AAC 3 & 4				
31	PT Palma Agro Lestari Jaya (70%)	PALJ Estates	Supply base for PALJ Oil Mill*	Aug,2023		NPP In Progress. HCV report under review by HCVRN.
		PALJ Plasma				
32	Knowledge One Investment Pte Ltd ( 85%)-PT Kharisma Inti Usaha ( KIU)	KIU 1 & 2 KIU 3 & 4	Supply base for KIU Oil Mill	July, 2019		In progress to engage consultants to carry out assessments as per NPP requirements.
		KIU Plasma		July 2022		

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

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

*\*Oil Mill planned for construction*

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

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

**Time bound Plan for Downstream Business (Supply Chain Certification)**

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

**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in [2018] for [Genting Bukit Sembilan Estate] 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 Bukit Sembilan Estate] and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	-
PKO	-

Extraction	%
OER	-
KER	-

Production	t/yr
FFB Process	-
CPO Produced	-
PKO Produced	-

Land Use	Ha
OP Planted Area	1180.06
OP Planted on peat	-
Conservation (forested)	-
Conservation (non-forested)	-
<b>Total</b>	-

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	12055.07	0.53	0	0	0	0	0	0
CO <sub>2</sub> Emission from fertilizer	1009.69	0.04	0	0	0	0	0	0
NO <sub>2</sub> Emmision	1025.16	0.04	0	0	0	0	0	0
Fuel Consumption	204.17	0.01	0	0	0	0	0	0
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-9913.42	-0.43	0	0	0	0	0	0
Conservation Sequestration	0	0	0	0	0	0	0	0



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

<b>Total</b>	<b>4380.67</b>	<b>0.19</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
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\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	-	-
Fuel Consumption	-	-
Grid Electricity Utilisation	-	-
<b>Credit</b>		
Export of Grid Electricity	-	-
Sales of PKS	-	-
Sales of EFB	-	-
<b>Total</b>	-	-

**Summary of Kernel Crusher Emission and Credit (if applicable)**

<b>Emissions</b>	<b>tCO<sub>2</sub>e</b>
PK from own mill	-
PK from other source	-
Fuel Consumptions	-
<b>Total Crusher emissions</b>	-

\*This mill has no kernel crusher operation.

<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	-
Divert to anaerobic diversion (%)	-

<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	-
Divert to methane captured (flaring) (%)	-
Divert to methane captured (energy generation) (%)	-

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

Not applicable

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

Not applicable

**Supply Chain Declaration**

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

<b>A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	N/A		

<b>B. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers (Oct 18 – May 19)</b>				
No.	Buyers Name	Palmtrace Trading No	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	N/A			

<b>C. Records of CPO &amp; PK Sold under other schemes to Buyers (Oct 18 – May 19)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (MT)	PK Sold (MT)
1	N/A	-	-	-

<b>D. Records of CPO &amp; PK Sold as conventional to Buyers (Oct 18 – May 19)</b>			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	N/A		

<b>E. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)</b>			
No.	Buyers Name	PalmTrace Trading No	RSPO Credits of Certified CPO Sold (MT)
N/A			

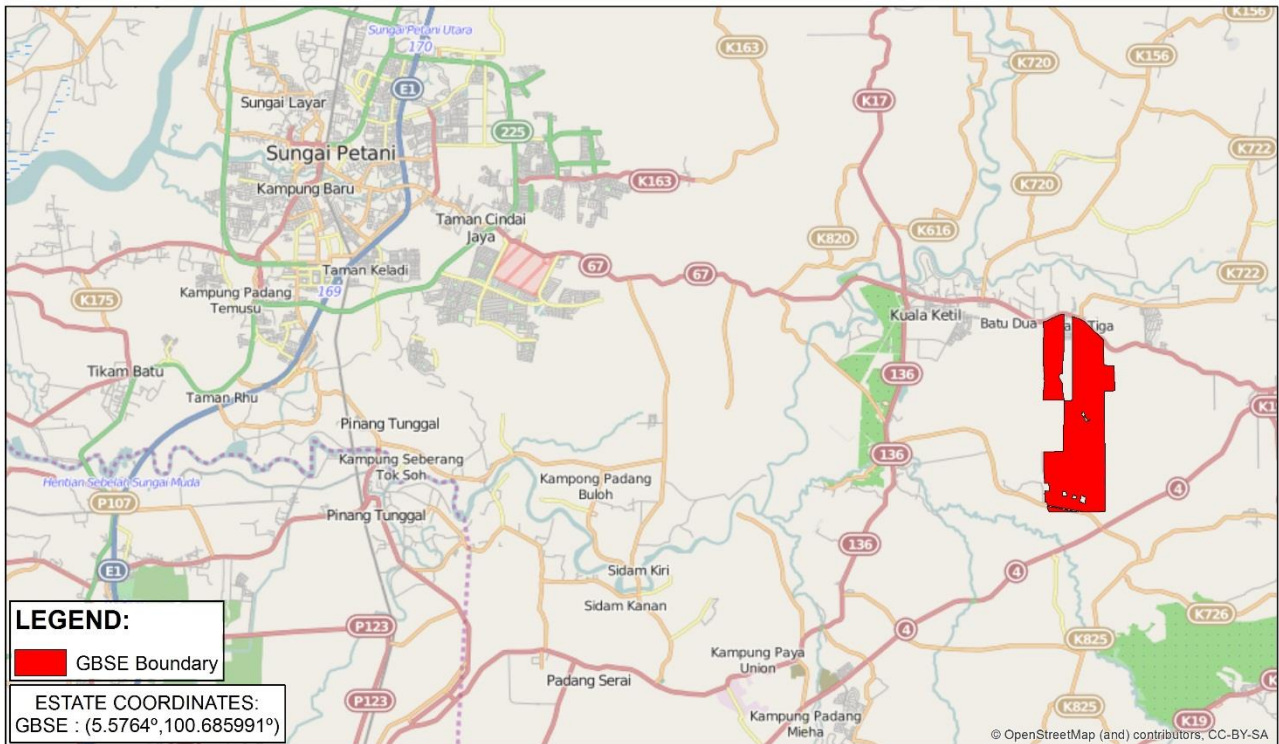
**Appendix F: Location Map of Genting Bukit Sembilan Estate**



**LOCATION MAP**  
**GENTING BUKIT SEMBILAN ESTATE**



Scale 1:131,700

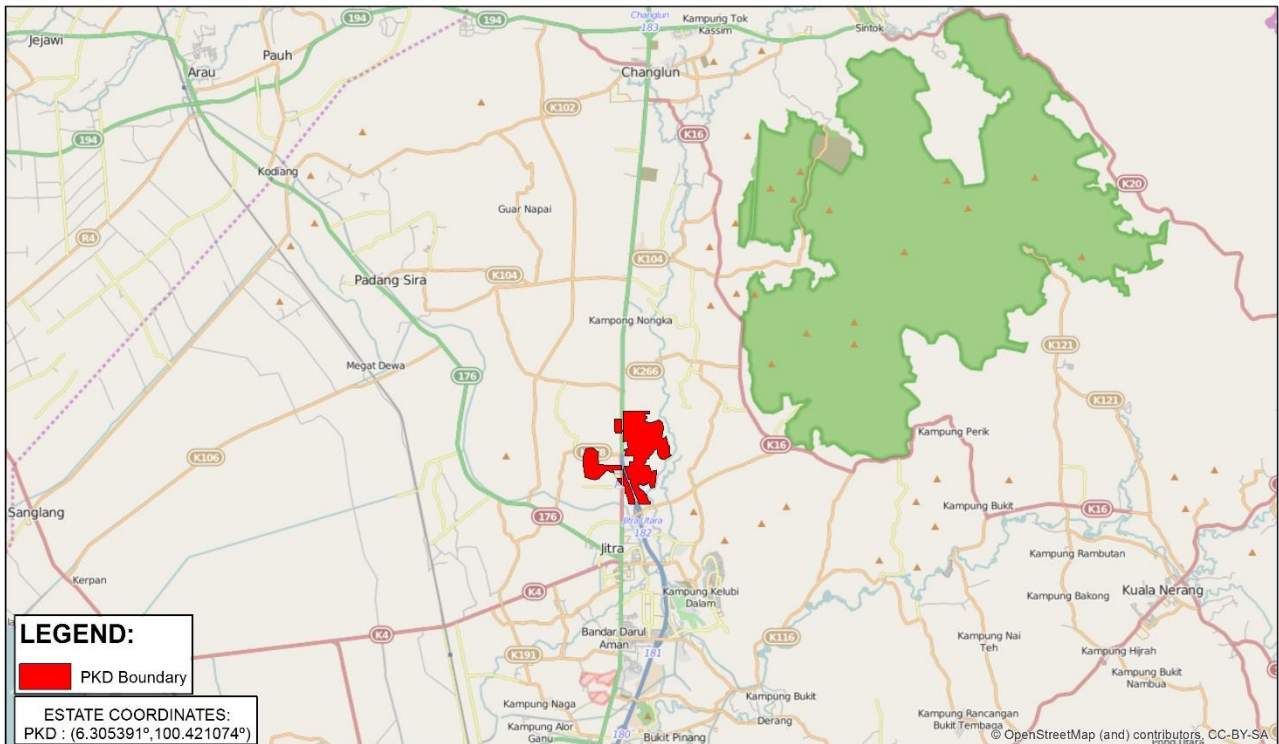


**Appendix G: Location Map of Genting Bukit Sembilan Estate (Paya Kamunting Division)**

**LOCATION MAP**  
**GENTING BUKIT SEMBILAN ESTATE**  
**PAYA KAMUNTING DIVISION**



Scale 1:175,500



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

Not applicable

## Appendix I: List of Abbreviations

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