

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (1\_1)**
- Recertification Assessment (Choose an item.)**
- Extension of Scope**

<b>Genting Plantations Berhad</b>
Client Company Address: 10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Wilayah Persekutuan Kuala Lumpur, Malaysia.
Certification Unit: <b>Genting Oil Mills (Sabah) Sdn Bhd - Genting Sabapalm Oil Mill</b>  Location of Certification Unit: KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia.
Date of Final Report: 11/10/2023

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## Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	Genting Plantations Berhad		
<b>RSPO Membership Number</b>	1-0086-06-000-00	<b>Membership Approval Date</b>	14/11/2006
<b>Address</b>	10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia.		
<b>Palm Oil Mill / Estate (Certification Unit)</b>	Genting Oil Mills (Sabah) Sdn Bhd - Genting Sabapalm Oil Mill		
<b>Location / Address</b>	KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia.		
<b>Website</b>	<a href="http://www.gentingplantations.com">www.gentingplantations.com</a>		
<b>Management Representative</b>	Mr. Arunan Kandasamy – Senior Vice President – Plantation (Malaysia) Mr. James Chung Khim Hon – Senior Vice President – Group Processing Ms. Erika Jesham – Sustainability Executive	<b>E-mail</b>	arunan.kandasamy@genting.com james.chung@genting.com erika.jesham@genting.com
<b>Telephone</b>	+603 2333 6510 (Head office)	<b>Facsimile</b>	+603 2333 6575

2. Certification Information			
<b>Certificate Number</b>	RSPO 653477	<b>Certificate Start Date</b>	28/09/2022
<b>Date of First Certification</b>	09/06/2016	<b>Certificate Expiry Date</b>	27/09/2027
<b>Scope of Certification</b>	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
<b>Visit Objectives</b>	The objective of the assessment is to conduct a Surveillance Assessment to ensure the elements of the scope of registration and the requirements of the management standard are effectively addressed by Genting Sabapalm Oil Mill and Genting Sabapalm Estate's management system and the ability of the management system to ensure the organisation meets applicable statutory, regulatory and contractual requirements and as applicable, to identify areas for potential improvement of the management system.		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		

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<b>Supply Chain Module</b>	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	20Mt/Hr
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

<b>3. Other Certifications</b>			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
EU-ISCC-Cert-DE119-60223799	ISCC EU	ASG Cert GmbH	31.12.2023
MSPO 689068	MS 2530-3:2013 – Part 3	BSI Services (M) Sdn Bhd	03.07.2024
MSPO 689067	MS 2530-4:2013 – Part 4	BSI Services (M) Sdn Bhd	03.07.2024

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base)</b>	<b>Location</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Genting Sabapalm Oil Mill	25 Km, Down Sungai Labuk, Mukim Tagas-Tagas, Beluran	5° 57' 54.3" N	117° 22' 26.8" E
Genting Sabapalm Estate	25 Km, Down Sungai Labuk, Mukim Tagas-Tagas, Beluran	5° 57' 54.3" N	117° 22' 26.8" E

<b>5. Description of Supply Base</b>					
<b>New Planting Development</b>	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
<b>Estate</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Genting Sabapalm Estate	3,947.20	8.91	402.47	4,358.58	91.00
<b>Total</b>	<b>3,947.20</b>	<b>8.91</b>	<b>402.47</b>	<b>4,358.58</b>	<b>91.00</b>

<b>6. Plantings &amp; Cycle</b>						
<b>Estate / Smallholders</b>	<b>Age (Years) - ha</b>				<b>Mature</b>	<b>Immature</b>
	<b>0 - 3</b>	<b>4 - 14</b>	<b>15 - 25</b>	<b>&gt;25</b>		
Genting Sabapalm Estate	942.08	892.62	2,112.50	0	3,005.12	942.08
<b>Total (ha)</b>	<b>942.08</b>	<b>892.62</b>	<b>2,112.50</b>	<b>0</b>	<b>3,005.12</b>	<b>942.08</b>

**Note:** Only Mature area is considered as production area

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<b>7. Summary of Certified Tonnage of FFB (Own Certified Scope)</b>				
<b>Estate / Smallholders</b>	<b>Tonnage (MT) / year</b>			
	<b>Estimated last year (Apr 22 – Mar 23)</b>	<b>Actual (Apr 22 – Jun 23)</b>		<b>Forecast (Sept 23 – Aug 24)</b>
		<b>Previous License Period (Apr 22 – Aug 22)</b>	<b>Current License Period (Sept 22 – Jun 23)</b>	
Genting Sabapalm Estate	98,880.00	31,601.66	69,230.95	106,000.00
<b>Total</b>	<b>98,880.00</b>	<b>100,832.61</b>		<b>106,000.00</b>

<b>8. Summary of Certified Tonnage of FFB (from other certified unit(s))</b>				
<b>Estate / Smallholders</b>	<b>Tonnage (MT) / year</b>			
	<b>Estimated last year (Apr 22 – Mar 23)</b>	<b>Actual (Apr 22 – Jun 23)</b>		<b>Forecast (Sept 23 – Aug 24)</b>
		<b>Previous License Period (Apr 22 – Aug 22)</b>	<b>Current License Period (Sept 22 – Jun 23)</b>	
–		–	–	
<b>Total</b>		–	–	

<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
<b>Out growers / smallholders</b>	<b>Tonnage (MT) / year</b>			
	<b>Estimated last year (Apr 22 – Mar 23)</b>	<b>Actual (Apr 22 – Jun 23)</b>		<b>Forecast (Sept 23 – Aug 24)</b>
		<b>Previous License Period (Apr 22 – Aug 22)</b>	<b>Current License Period (Sept 22 – Jun 23)</b>	
Smallholder, Outgrowers & Estate	21,600.00	8,725.89	19,327.59	23,200.00
<b>Total</b>	<b>21,600.00</b>	<b>28,053.48</b>		<b>23,200.00</b>

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply base (mt)</b>	<b>Volume of FFB from uncertified supply base (mt)</b>	<b>Total FFB/Month (mt)</b>
1	April 2022	5,837.21	1,731.24	7,568.45
2	May 2022	5,804.30	1,613.95	7,418.25
3	June 2022	4,956.70	1,614.57	6,571.27
4	July 2022	6,613.11	1,690.49	8,303.60

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5	August 2022	8,390.34	2,075.64	10,465.98
6	September 2022	9,708.70	2,408.71	12,117.41
7	October 2022	9,849.45	2,501.48	12,350.93
8	November 2022	9,179.81	2,316.10	11,495.91
9	December 2022	6,617.57	2,063.15	9,680.72
10	January 2023	5,384.02	1,599.88	6,983.90
11	February 2023	3,424.21	1,077.55	4,501.76
12	March 2023	5,302.94	1,840.83	8,143.77
13	April 2023	4,809.64	1,667.33	7,476.97
14	May 2023	8,009.93	1,975.92	9,985.85
15	June 2023	6,944.68	1,876.64	8,821.32
<b>TOTAL</b>		<b>100,832.61</b>	<b>28,053.48</b>	<b>131,886.09</b>

<b>10. Summary of Certified Tonnage (MT) (not applicable for ISS)</b>			
<b>Estimated last year (Apr 22 – Mar 23)</b>	<b>Actual (Apr 22 – Jun 23)</b>		<b>Forecast (Sept 23 – Aug 24)</b>
	Previous License Period (Apr 22 – Aug 22)	Current License Period (Sept 22 – Jun 23)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
100,839.00 mt	31,601.66 mt	69,230.95 mt	106,000.00 mt
	<b>TOTAL</b>	100,832.61 mt	
<b>CPO (OER: 21.00%)</b>	<b>CPO (OER: 20.95%)</b>		<b>CPO (OER: 20.90%)</b>
21,166.48 mt	6,467.80 mt	14,654.45 mt	22,200.00 mt
	<b>TOTAL</b>	21,122.25 mt	
<b>PK (KER: 4.02%)</b>	<b>PK (KER: 4.01%)</b>		<b>PK (KER: 3.96%)</b>
4,053.52 mt	1,192.42 mt	2,852.84 mt	4,200.00 mt
	<b>TOTAL</b>	4,045.26 mt	

<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (MT)</b>	<b>Certified PK (MT)</b>
1	April 2022	1,227.21	235.68
2	May 2022	1,178.08	226.38
3	June 2022	1,036.87	179.63
4	July 2022	1,326.60	226.08

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5	August 2022	1,699.04	324.65
6	September 2022	1,987.96	375.98
7	October 2022	2,046.71	378.56
8	November 2022	1,887.21	374.80
9	December 2022	1,531.28	306.36
10	January 2023	1,054.61	211.87
11	February 2023	663.58	137.01
12	March 2023	1,254.21	250.60
13	April 2023	1,197.80	227.15
14	May 2023	1,643.04	306.92
15	June 2023	1,388.05	283.59
<b>TOTAL</b>		<b>21,122.25</b>	<b>4,045.26</b>

<b>11. Summary of Actual Volume sold</b>					
<b>Current License period (Sep 22 – Jun 23)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	-	3,801.00	-	386.19	4,187.19
<b>PK (MT)</b>	756.02	-	-	-	756.02
<b>Credits</b>	-	-	-	-	-
<b>Previous License period (April 22 –Aug 22)</b>					
<b>CPO (MT)</b>	5,190.75	10,157.00	-	1,544.76	16,892.51
<b>PK (MT)</b>	3,024.10	-	-	107.11	3,131.21
<b>Credits</b>	-	-	-	-	-
<b>Note:</b>					
(1) Conventional is RSPO certified material but sold as non-RSPO.					

<b>11A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	XXX	RSPO_PO1000005763	5,190.75	-
2	XXX	RSPO_PO1000007211	-	3,024.10
3	XXX	RSPO_PO1000007211	-	756.02
<b>TOTAL</b>			<b>5,190.75</b>	<b>3,780.12</b>

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11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	XXX	ISCC	13,958.00	-
<b>TOTAL</b>			<b>13,958.00</b>	<b>-</b>

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	XXX	1,930.95	-
2	XXX	-	107.11
<b>TOTAL</b>		<b>1,930.95</b>	<b>107.11</b>

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
1	-	-	-
<b>TOTAL</b>			<b>-</b>

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Apr 22 – Mar 23)			Actual (Apr 22 – Jun 23)			Forecast (Sep 23 – Aug 24)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			-			-			-
IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	
CSPK	-	-		-	-		-	-	



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12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
-	-	-	-	-	-	-
-	-	-	-	-	-	-
<b>TOTAL</b>		-	-	-	-	-

**Note:** 1 mt = 1 credit

Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
<b>Current License period (Sep 22 – Jun 23)</b>							
<b>Credits</b>				-	-	-	-
<b>Physical</b>	-	-	-				
<b>Previous License period (Apr 22 - Aug 22)</b>							
<b>Credits</b>				-	-	-	-
<b>Physical</b>	-	-	-				

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
<b>TOTAL</b>			-	-	-	-	-

**Note:**

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)  
Suite 29.01 Level 29, The Gardens North Tower,  
Mid Valley City, Lingkaran Syed Putra,  
59200 Kuala Lumpur, Malaysia.  
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639  
Representative: Dr. Chaiyaporn Seekao ([Chaiyaporn.Seekao@bsigroup.com](mailto:Chaiyaporn.Seekao@bsigroup.com))  
Website: [www.bsigroup.com](http://www.bsigroup.com)

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI 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.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **10/07/2023 – 13/07/2023**. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The Critical NC close out remote assessment was conducted on 18/09/2023. The audit programs 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. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula  $(\sqrt{y}) \times (z)$ ; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA1_1)	Year 3 (ASA1_2)	Year 4 (ASA1_3)	Year 5 (ASA1_4)
Genting Sabapalm POM	✓	✓	✓	✓	✓
Genting Sabapalm Estate	✓	✓	✓	✓	✓

**Tentative Date of Next Visit: July 8, 2024 - July 11, 2024**

**Total Number of Mandays: 9.5 Mandays**

## 2.2 BSI Assessment Team

Name	Role	Competency
Vijay Kanna Pakirisamy (VKP)	Team Leader	<p><b>Education:</b> Holds a Bachelor Degree in Agribusiness Science Management with Honours, University Utara Malaysia.</p> <p><b>Work Experience:</b> He has 10 years’ experience in Oil Palm Estate Management in leading Oil Palm Companies such as KL Kepong Bhd, IOI Plantations and United Plantations. The last position held was Senior Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He has been an sustainable palm oil auditor since 2019.</p> <p><b>Training attended:</b> He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, HCV &amp; HCS Introductory Training g and SMETA Requirements Training, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&amp;C and SCCS).</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of Environment requirements, HCV, GHG, EIA, Estate and Mill , Best Practises and supply chain requirements.</p> <p><b>Language proficiency:</b> Fluent in English, Bahasa Malaysia.</p>
Mohd. Razaleigh Mohamad (MRM)	Team Member	<p><b>Education:</b> Holds a Bachelor Degree in Plantation Management and Agrotechnology, University Technology Mara (UiTM).</p> <p><b>Work Experience:</b> He has 5 years’ experience in Oil Palm Estate Management with Tradewinds Plantation Berhad. The last position held was Senior Assistant Manager. He has more than 4 years of experience in Third Party Certification Audit with Control Union (M) Sdn Bhd for RSPO P&amp;C, MSPO P&amp;C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements.</p> <p><b>Training attended:</b> He has completed ISO 9001-2015 Lead Auditor Course, ISO14001- 2015 Lead Auditor Course, ISO45001-2018 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed MSPO P&amp;C Lead Auditor Course, Social Accountability SA8000 Auditor Course, RSPO Independent</p>

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		<p>Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&amp;C and SCCS).</p> <p><b>Aspects covered in this audit:</b> During this assessment, he assessed on the aspects of Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land &amp; Legal issue and supply chain.</p> <p><b>Language proficiency:</b> Fluent in English and Bahasa Malaysia</p>
<p>Yusof Khairan Nizar (YKN)</p>	<p>Team Member</p>	<p><b>Education:</b> Holds a Diploma in Public Administration-ITM (1991), Certificate of Safety and Health Officer-MII (2003), Bachelor of Corporate Administration (Hons), MARA University of Technology and a Master of Science in Occupational Safety and Health Management-Northern University of Malaysia.</p> <p><b>Work Experience:</b> Has more than 30 years of working experience in varies industries including as safety officer in manufacturing company; consultant and trainer for management systems including ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, OHSAS 18001:2007, MS1722:2011, Environmental Legislation; contract auditor with varies accredited certification bodies for scheme including Malaysia Sustainable Palm Oil (MSPO), RSPO Principles &amp; Criteria; MPOCC Registered Peer Reviewer and was a Certificate of Safety and Health Officer-Malaysian Insurance Institute.</p> <p><b>Training attended:</b> He has completed ISO 9001:2000 IRCA/IATC A Lead Auditor Training; ISO 14001:2004 IEMA Approved EMS Advanced Lead Auditor Training Course; OH&amp;SMS IRCA Certified Lead Auditor Training Course; MS 1722 Lead Auditor Training; MSPO Auditing; Endorsed RSPO P&amp;C 2018 Lead Auditor Course; SMETA Requirements Training; HCV &amp; HCS Introductory Training, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&amp;C).</p> <p>. Also attended the Quality &amp; Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment – For Bodied Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality Malaysia, ISO/IEC 17021. MSPO Peer Reviewer Training (MPOCC).</p> <p><b>Area Covered in Audit:</b> During this assessment, he assessed on the aspects of Occupational, Health &amp; Safety and Estate Best Practises</p> <p><b>Language Proficiency:</b> Fluent in English and Bahasa Malaysia</p>

**Accompanying Persons:**

Name	Role
-	-

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**2.3 Assessment Plan**

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

Date	Time	Subjects	VKP	MRM	YKN
Sunday, 09/07/2023	-	Audit Team travel from Kuala Lumpur to Sandakan, Sabah.	✓	✓	✓
Monday, 10/07/2023	0900 - 1230	<b>Genting Sabapalm Oil Mill</b> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, Lab, weighbridge and palm product storage area, etc.	✓	✓	✓
	1230 - 1330	LUNCH BREAK	✓	✓	✓
	1330 - 1630	Document review P1 – P7: Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation.	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Tuesday, 11/07/2023	0900 - 1230	<b>Genting Sabapalm Oil Mill</b> Continue document review P1 – P7: Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation.	✓	✓	✓
	1000 - 1200	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	-	✓	-
	1230 - 1330	LUNCH BREAK	✓	✓	✓
	1330 - 1630	Document review: RSPO SCCS general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records of RSPO SCCS.	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Wednesday 12/07/2023	0900 - 1230	<b>Genting Sabapalm Estate</b> 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 BREAK	✓	✓	✓

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Date	Time	Subjects	VKP	MRM	YKN
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder, workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Thursday 13/07/2023	0900 - 1200	<b>Genting Sabapalm Estate</b> Document review P1 – P7: (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.)	✓	✓	✓
	1200 - 1230	Verify any Outstanding Issues and Preparation for Closing Meeting	✓	✓	✓
	1230 - 1330	Closing Meeting	✓	✓	✓
	1300	Audit Team travel to Sandakan	✓	✓	✓
Friday 14/07/2023	-	Audit Team travel from Sandakan, Sabah to Kuala Lumpur.	✓	✓	✓

**Critical NC Close Out Remote Assessment Plan**

Date	Time	Subjects	VKP	ICT Planned
Monday, 18/09/2023	1000 – 1130	Virtual Opening Meeting: 1. Opening Presentation by Audit Team Leader. 2. Confirmation of assessment scope and finalize Audit plan. 3. Verification on Critical NC: • 2367634-202307-M1 4. Workers Interview (Virtual) 5. Document review – implemented evidence	✓	Microsoft Teams & WhatsApp
	1130 – 1200	Virtual Closing Meeting	✓	

### Section 3: Assessment Findings

#### 3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	The time bound plan has included all the subsidiaries of Genting Plantations Berhad. The TBP includes all units in Malaysia and Indonesia. The detail of the subsidiaries and the management units is as per Approved Time Bound Plan dated 29/3/2023	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	No. As reported in the approved time bound plan dated 29/3/2023, plan to certify all the Genting Plantations Berhad management units by December 2025.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021. <i>Note:</i> <i>New acquisition is from the moment the company is legally registered with the local notary or chamber of commerce or equivalent.</i>	No new acquisition as of June 2023. TBP deviation approval dated 29/3/2023 was obtained from RSPO.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	The maximum period has ended by June 2023. Nonetheless, Genting Plantations Berhad has obtained TBP deviation approval dated 29/3/2023 and extended until December 2025.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Changes to the time-bound plan incorporated in the certification plan and approved by RSPO on 29/3/2023. ACOP reporting has been verified and found to be consistent.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No isolated lapses observed.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation	No fundamental failure found.	Complied

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of the plan? If yes a <b>Major</b> non-compliance shall be raised		
<b>Un-Certified Units or Holdings</b>		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	NPP documents are publicly available at the RSPO website. Registered HCSA reports Completed Peer Review Reports are published at: <a href="https://highcarbonstock.org/registered-hcsa-and-hcv-hcsa-assessments/">https://highcarbonstock.org/registered-hcsa-and-hcv-hcsa-assessments/</a>	Complied
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	Completed Peer Reviewed HCV reports:  PT Sawit Mitra Abadi:  <a href="https://www.hcvnetwork.org/reports/hcv-pt-sawit-mitra-abadi-additional-1-000-ha-ketapang-regency-west-kalimantan-province-indonesia">https://www.hcvnetwork.org/reports/hcv-pt-sawit-mitra-abadi-additional-1-000-ha-ketapang-regency-west-kalimantan-province-indonesia</a>  PT United Agro Indonesia:  <a href="https://www.hcvnetwork.org/reports/hcv-in-the-permit-area-pt-united-agro-indonesia">https://www.hcvnetwork.org/reports/hcv-in-the-permit-area-pt-united-agro-indonesia</a>  PT Agro Abadi Cemerlang:  <a href="https://www.hcvnetwork.org/reports/hcv-concession-area-of-pt-agro-abadi-cemerlang-sanggau-regency-west-kalimantan-province-indonesia">https://www.hcvnetwork.org/reports/hcv-concession-area-of-pt-agro-abadi-cemerlang-sanggau-regency-west-kalimantan-province-indonesia</a>  PT Kharisma Inti Usaha (KIU):  <a href="https://www.hcvnetwork.org/reports/high-conservation-value-identification-pt-kharisma-inti-usaha">https://www.hcvnetwork.org/reports/high-conservation-value-identification-pt-kharisma-inti-usaha</a>  PT Palma Agro Lestari Jaya:  <a href="https://www.hcvnetwork.org/reports/hcv-pt-palma-agro-lestari-jaya-sintang-regency-west-kalimantan-indonesia">https://www.hcvnetwork.org/reports/hcv-pt-palma-agro-lestari-jaya-sintang-regency-west-kalimantan-indonesia</a>  PT Sepanjang Intisurya Mulia:  <a href="https://www.hcvnetwork.org/reports/laporan-hcv-hcs-integrasi-di-areal-izin-penambahan-luasan-pt-sepanjang-intisurya-mulia-kabupaten-ketapang-provinsi-kalimantan-barat">https://www.hcvnetwork.org/reports/laporan-hcv-hcs-integrasi-di-areal-izin-penambahan-luasan-pt-sepanjang-intisurya-mulia-kabupaten-ketapang-provinsi-kalimantan-barat</a>	Complied



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<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>Based on RSPO Complaints System or Dispute Settlement Facility <a href="https://askrspo.force.com/Complaint/s/casetracker">https://askrspo.force.com/Complaint/s/casetracker</a>, there is no outstanding land conflicts. Should there be any, the following company's procedures applied: <u>Indonesian Operating Units</u> SOP - CPD – 02-00.00 <i>Mekanisme Penyelesaian Sengketa Lahan</i></p> <p><u>Malaysian Operating Unit</u> SMP-GPB-18 Negotiation, Compensation and Handling Procedures Referring to the RaCP Tracker, Genting Plantations Berhad has a total of 7 submitted LUCA which all of them had been reviewed. There are 3 CN required which 1 of them has been submitted and approved. There are also 6 RP required which 2 of them have been submitted and 1 has been approved.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 4.2</p>	<p>Based on RSPO Complaints System or Dispute Settlement Facility <a href="https://askrspo.force.com/Complaint/s/casetracker">https://askrspo.force.com/Complaint/s/casetracker</a>, there is no outstanding labour dispute. Should there be any, the following company's procedures applied: <u>Indonesian Operating Unit</u> SOP - HRD-04-00.00 <i>Penyelesaian Keluh Kesah</i></p> <p><u>Malaysian Operating Unit</u> SMP-GPB-19 Complaints and Grievances</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>No legal non-compliance issue raised.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Yes, GPB's Sustainability Department conducted the internal audits in several dates January 2023 for the uncertified estates. Positive Assurance Statement for 2023 was made available for verification.</p>	<p>Complied</p>
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during</p>	<p>Based on the internal audit reports, there were several NC raised and one of them is related to Indicator 7.12.8. At the point of this assessment,</p>	<p>Complied</p>

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the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	there are on-going RaCP to be resolved. This can be viewed at <a href="https://rspo.org/as-an-organisation/tools/remediation-and-compensation/racp-trackers/">https://rspo.org/as-an-organisation/tools/remediation-and-compensation/racp-trackers/</a>	
Have there been any stakeholder (including NGO) consultation conducted?	Yes. NGOs were engaged especially in developing the HCV documentations for the uncertified units. Among the NGOs consulted were: <ul style="list-style-type: none"> <li>- WWF (Sintang)</li> <li>- Rainforest Alliance (Sintang and Ketapang)</li> <li>- Tropenbos International (Ketapang)</li> <li>- YIARI (Ketapang)</li> <li>- BOSF (Kapas)</li> </ul>	Complied

**3.2 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
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.	There are no scheme smallholders or scheme outgrowers within the Certification Unit of Genting Sabapalm. Thus this is not applicable.	Not Applicable

**Approved Time Bound Plan**

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of November 2022	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		Dec, 2015		
5		Genting Tebong Estate		July, 2015		
6	Genting Plantations (WM) Sdn Bhd (100%) for estate	Genting Selama Estate, Kedah, Malaysia		July 2019	Certified	None
7	Genting Oil Mills (Sabah) Sdn Bhd (100%) for Mill Genting Plantations Berhad (Estate)	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 Oil Mills (Sabah) Sdn Bhd (Mill)	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,				

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of November 2022	Any unresolved non-compliances
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	July, 2022	Certified on 19/09/2022	None. RSPO Remediation and Compensation Plan (RaCP)[RaCP 2076] for Genting Tanjung Bahagia Sdn. Bhd. - Genting Kencana Estate (Subsidiary of Genting Plantations Berhad), project period 1/5/2022 – 1/5/2046
14	Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Permai Estate, Sabah, Malaysia				
15		Genting Kencana Estate, Sabah, Malaysia				
16	Genting Oil Mills (Sabah) Sdn Bhd (100%) for estate and mill	Genting Jambongan Estate, Sabah, Malaysia	Supply base for Genting Jambongan Oil Mill, Sabah, Malaysia	Sept 2019	Certified	None
17	Genting Plantations Bhd Wawasan Land Progress Sdn Bhd (100%) Genting Oil Mills (Sabah) ( Mill)	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		Oct, 2017	Certified	None

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of November 2022	Any unresolved non-compliances
		Mulia 3 & 4 Mulia 5 & 6	Supply base for Mulia Oil Mill, Kalimantan, Indonesia			
20	PT Sawit Mitra Abadi (70%)	Abadi 1 & 2 Abadi 3 & 4				
21	PT Sepanjang Intisurya Mulia (70%)	Area 199 Ha Area 1300 Ha	Supply base for Mulia Oil Mill, Kalimantan, Indonesia	Oct, 2025	Not certified	In Process of NPP In process of obtaining HGU.
22	PT Sawit Mitra Abadi (70%)	Area 1000 Ha				NPP Process In process of obtaining HGU.
23	Genting Plantations Berhad (100%) Estate Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Mewah Estate, Sabah, Malaysia	Supply base for Genting Mewah Oil Mill, Sabah, Malaysia	Mar, 2017	Certified	None
24	Genting Plantations (WM) Sdn Bhd (100%)	Genting Bukit Sembilan Estate, Kedah, Malaysia		July, 2017	Certified	None
25	PT Globalindo Agung Lestari (60%)	Lamunti Barat Estate Lamunti Timur Estate I & II Mengkatip Estate I & II Bakuta Estate Plasma Timur & Barat	Supply base for Globalindo Oil Mill, Kalimantan, Indonesia	Aug, 2023	Not certified	RaCP complete in October 2022.
26	PT United Agro Indonesia(60%)	PT UAI 1 & 2 UAI Plasma		Aug, 2023		

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of November 2022	Any unresolved non-compliances
27	PT Susantri Permai (95%)	Puroh Estate Masaha Estate Zircon Hill Estate	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia	Oct, 2025	Not certified	In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		SP Plasma		Oct, 2025		
28	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, 2025	Not certified	In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		KMJ Plasma		Oct, 2025		
29	PT Dwie Warna Karya (95%)	Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate		Oct, 2025	Not certified	In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		DWK Plasma		Oct, 2025		
30	PT Citra Sawit Cemerlang (70%)	CSC Estates	Supply base for Mulia Oil Mill	Oct, 2025	Not certified	In process of obtaining HGU. HCSA report completed review.
31	PT Surya Agro Palma (70%)	SAP Estate 1&2 SAP Estate 3&4 SAP Estate 5&6	Supply base for Cemerlang Oil Mill, Kalimantan, Indonesia	Sept, 2025	Not certified	"n process of obtaining HGU. HCSA report completed review.
		Plasma		Sept, 2025		
32	PT Agro Abadi Cemerlang (70%)	AAC 1 & 2		Sept, 2025		In process of obtaining HGU
		AAC 3 & 4				

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of November 2022	Any unresolved non-compliances
						HCSA report completed review. Report not published yet.
		Plasma – KSK1, KMB, BSL		Sept, 2025	Not certified	RaCP Process (annex 5)
33	PT Palma Agro Lestari Jaya (70%)	PALJ Estates		Dec, 2025	Not certified	In process of obtaining HGU. HCSA report completed review.
		PALJ Plasma				
34	Knowledge One Investment Pte Ltd (85%)-PT Kharisma Inti Usaha (KIU)	KIU 1 & 2 KIU 3 & 4	Supply base for KIU Oil Mill	Dec, 2025	Not certified	NPP in progress. HCV report approved by HCVRN. HCSA report is completed and waiting for peer review.

### 3.3 Details of Nonconformities

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

During this Assessment there were One (1) Critical; Three (3) Minor nonconformities and Three (3) Opportunity For Improvement raised. The Genting Oil Mills (Sabah) Sdn Bhd – Genting Sabapalm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
<b>NCR Ref #</b>	2367634-202307-M1	<b>Issued Date</b>	13/07/2023
<b>Due Date</b>	13/10/2023	<b>Closure Date</b>	18/09/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	2.2.2 (Critical) - Escalated		
<b>Statement of Nonconformity:</b>	There is no mechanism to monitor compliance of legal requirement for contracted parties.		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
<b>Objective Evidence:</b>	<u>Genting Sabapalm Estate</u> Verification to close minor non-conformities found out there is still business licenses that used address from other places. Details as per below 1. Man`znie Trading R41307/2020, Shops location: Lot 7, Block M Tingkat Bawah Bandar Letat Jaya, Batu 04, Jalan Lintas Utara, Sandakan. Due to reoccurrence of same issues for the same indicator, minor non-conformity have been escalated to critical non-conformity.		
<b>Corrections:</b>	Immediate meeting with sundry shop operators has been held on 13/07/2023. All of them has been given written reminder to settle their business licenses within one (1) month from the date of the letter issued. They also required to submit their copy of valid business licenses to estate management for physical verification on 14/08/2023. They will not be allowed to continue operating their business if their business licenses not complied as per Tenancy Agreement after verification.		
<b>Root Cause Analysis:</b>	No proper documentation maintain by the estate to ensure all required legal requirements complied by the sundry shop operator.		
<b>Corrective Actions:</b>	The PIC (Estate CC) will monitor the sundry shop operator tenancy agreement compliance on a yearly basis by using the tenancy and legal compliance checklist during the renewal of contract. If the sundry shop found not complied with the legal requirements and tenancy agreement, the contract will not renewed and new tender issued.		



<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. A meeting with sundry shop operators has been held on 13/07/2023, attended by 4 sundry shop owners and the management representatives. The attendance form was available for verification.</li> <li>2. All of the sundry shop owners has been given written reminder to settle their business licenses within one (1) month from the date of the letter issued. The letter was issued dated 13/07/2023 and available for verification.</li> <li>3. Maz'nie Trading has changed their legal name to Nur Aisyah Trading, effective 01/08/2023 as stated in the letter dated 01/08/2023 to the management. Therefore, Maznie Trading is now operating under the license name of NurAisyah Trading. Verified the Business License with License ID: BLN/2023/3321 (Groceries) and BLN/2-023/3320 (Food &amp; Beverages) for Nur Aisyah Trading with premise located at Genting Sabahpalm Estate, dated 27/07/2023.</li> <li>4. The estate has established a "Tenancy Agreement Checklist" to monitor the sundry shop operator tenancy agreement compliance. Verified the tenancy Agreement Checklist for Nur Aisyah Trading dated 23/08/2023.</li> </ol> <p>Based on the implementation of the corrections and corrective action plans, it can be concluded that the raised non-conformity has been effectively addressed. Therefore the critical non-conformity is effectively closed on 18/09/2023.</p>
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Non-conformity			
<b>NCR Ref #</b>	2367634-202307-N1	<b>Issued Date</b>	13/07/2023
<b>Due Date</b>	Next Surveillance Assessment	<b>Closure Date</b>	"Open"
<b>Indicator &amp; Category (Critical / Minor)</b>	4.2.3 Minor		
<b>Statement of Nonconformity:</b>	Complaint received has not been responded in a timely manner.		
<b>Requirement Reference:</b>	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.		
<b>Objective Evidence:</b>	<p>Mechanism to lodge any complaint has been raised in the document number SMP-GPB-19 revision 05 issuance date June 2022 title "Sustainability management Procedure manual", 3.0, complaints and grievances handling procedure. Stated in the procedure that the time timeframe for the action taken depend on the seriousness of the complaint or grievance. It also mentioned that accepted time frame to acknowledge and respond to the complaint (s) is within 1 month's period.</p> <p>During the workers representative meeting for Genting Sabapalm POM conducted on 23/03/2023, the management received complaint from the workers representative on damage of septic tank at one of the sundry shops and the waste flow to the drainage at the POM workers quarters. All sundry shops are under Genting Sabapalm Estate management and request was sent by Genting Sabapalm POM on 21/03/2023 to Genting Sabapalm Estate to repair the septic tank, prior to the meeting.</p>		

	<p>Further verification done by the auditor during the site visit, found out that the issues have not been resolved and it has been confirmed through interview with the sundry shops' owner and the complainer that they have not been updated on the progress of the complaint.</p> <p>Verification at the estate found out that order has been placed on 01/07/2023 based on purchase order reference number ASPEP15388 with total amount RM 2,808.40. Thus, the timeframe taken by the management to respond to this issue, exceeded the 1-month period, as stated in the SOP.</p>
<b>Corrections:</b>	<p>The complainer and sundry shop operator has been immediately informed on the progress of the issue on 12.7.2023. The septic tank also delivered on the same day and replacement of the damage septic tank and piping works has been completed on 22.7.2023. The completion work has been documented and acknowledged by the complainer.</p>
<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>1. Estate is aware of the issue and has sent own carpenter to do inspection and evaluation of the cost involved to repair or replace the septic tank of the respective sundry shop in the beginning of April 2023 but the action has not been documented in order to respond the request dated on 21.03.2023 to respective complainer as per SMP-GPB-19 revision 05.</li> <li>2. Lack of communication and follow up between shop operator and estate management while obtaining quotation to replace the damage septic tank coupled with temporary change in management. Due to the SEM overseeing the estate at that point, information on the subject was not communicated to the returning manager, of which approval would be required by the General Manager. This also caused the issue taking a longer period of time to respond as the issue involve high amount of cost.</li> </ol>
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Dedicate PIC (Assistant Manager) will be appointed and train to handle all complaint, grievances and enquiries as well as risk management.</li> <li>2. PIC in charge of social and risk management has been given training on 15/07/2023.</li> </ol>
<b>Assessment Conclusion:</b>	<p>The submitted CAP detailing on proposed actions to be taken to address the raised minor nonconformity, based on the root cause identified were reviewed and deemed to be appropriate. Thus, the effectiveness of the CAP will be verified during the next surveillance assessment.</p>

<b>Non-conformity</b>			
<b>NCR Ref #</b>	2367634-202307-N2	<b>Issued Date</b>	13/07/2023
<b>Due Date</b>	Next Surveillance Assessment	<b>Closure Date</b>	"Open"
<b>Indicator &amp; Category (Critical / Minor)</b>	3.3.2 (Minor)		
<b>Statement of Nonconformity:</b>	The spillage of diesel located at Genting Sabapalm POM was not properly handled, contained from entering drain and adjacent effluent pond as SDS dated 04/10/2019.		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures is in place.		

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<b>Objective Evidence:</b>	<ol style="list-style-type: none"> <li>1. Found spillage of diesel mark on soils at skid tank storage located in Genting Sabapalm POM and later covered with soils.</li> <li>2. SDS sampled for Diesel. Petronas Diesel Euro 5 (B7) Released 04/10/2019. Section 16: Accidental release measures stated Prevent product from entering drain as environmental precautions. Contain spillage and then collect with non-combustible absorbent materials (eg. Earth, sand, diatomaceous earth, vermiculite).</li> <li>3. Standard Operating Procedure (SOP) Rev.03, dated 11/10/2013 under Steps in managing and handling fuel could be further improved explaining method to handle and contain spillage.</li> </ol>
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Training on managing and handling fuel to respective PIC</li> <li>2. The diesel spillage on the soil was contained and collected with sand filled in the empty fertilizer bag.</li> <li>3. The contaminated soil was sent to schedule waste store.</li> <li>4. To further improve the SOP Rev.03, date 11/10/2013 under Steps in managing and handling fuel.</li> </ol>
<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>1. No proper spillage containment kit was available</li> <li>2. Oil trap is too small</li> </ol>
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Estate to ensure PIC are well trained and understand on managing and handling fuel spillage as per SDS and revised SOP.</li> <li>2. Oil trap will be increased in size.</li> <li>3. To review the Standard Operating Procedure (SOP) Rev.03 dated 11/10/2013 under Steps in managing and handling fuel (contain spillage).</li> </ol>
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the raised minor nonconformity, based on the root cause identified were reviewed and deemed to be appropriate. Thus, the effectiveness of the CAP will be verified during the next surveillance assessment.

Non-conformity			
<b>NCR Ref #</b>	2367634-202307-N3	<b>Issued Date</b>	13/07/2023
<b>Due Date</b>	Next Surveillance Assessment	<b>Closure Date</b>	"Open"
<b>Indicator &amp; Category (Critical / Minor)</b>	7.8.3 (Minor)		
<b>Statement of Nonconformity:</b>	Effects of mill effluent discharge were not adequately monitored.		
<b>Requirement Reference:</b>	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.		
<b>Objective Evidence:</b>	In regard to the Mill Effluent management, the DOE Compliance Schedule has required for river water quality monitoring to be done by establishing 2 sampling		

	<p>points, approved by DOE, at the upstream and downstream, to monitor the impacts of effluent discharge to the nearest water bodies.</p> <ol style="list-style-type: none"> <li>1. There was no evidence that the established sampling points at the downstream and upstream obtained approval from DOE.</li> <li>2. The established upstream sampling point was after the "Environmental Impact Point" and not before as required to monitor the difference in river water quality via water sampling.</li> </ol>
<b>Corrections:</b>	Send a letter to Ketua Pengarah Jabatan Alam Sekitar on the proposed location for upstream and downstream sampling points for his approval.
<b>Root Cause Analysis:</b>	Management was not aware of the requirement of the sampling points to be approved by DOE.
<b>Corrective Actions:</b>	Due to frequent changes in the mill management team, dedicated PIC at regional office have been appointed to monitor mills permits, legal requirements as well as KB compliance and update any changes if any.
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the raised minor nonconformity, based on the root cause identified were reviewed and deemed to be appropriate. Thus, the effectiveness of the CAP will be verified during the next surveillance assessment.

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>OFI 1</b>	<p>OFI Reference: 2367634-202307-I1 Indicator: 6.5.3</p> <p>Checklist for new mother assessment can be further improved by identifying relevant questions included in the checklist base on the timing of assessment to obtain more information on new mothers need.</p>
<b>OFI 2</b>	<p>OFI Reference: 2367634-202307-I2 Indicator: 3.6.1</p> <p>The HIRARC to be further improved to ensure all developed HIRARC to be consistent with the new formats, as per HIRARC New Risk Management Regulations.</p>
<b>OFI 3</b>	<p>OFI Reference: 2367634-202307-I3 Indicator: 7.2.10</p> <p>The planning to conduct the Annual Medical Surveillance for each chemical handlers could be further enhanced.</p>

<b>Positive Findings</b>	
<b>PF #</b>	<b>Description</b>
<b>PF 1</b>	Good Housekeeping at Genting Jambongan Oil Mill and Estate.
<b>PF 2</b>	Good document retrieval
<b>PF 3</b>	Good commitment from the Management Team during the assessment
<b>PF 4</b>	Good establishment of signages around the estate and mill.

<b>PF 5</b>	Good implementations of safety measure at Spaying Operation.
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**3.3.1 Status of Nonconformities Previously Identified and Observations**

Non-conformity									
<b>NCR Ref #</b>	2189110-202204-M1	<b>Issued Date</b>	15/04/2022						
<b>Due Date</b>	15/07/2022	<b>Closure Date</b>	05/07/2022						
<b>Indicator &amp; Category (Critical / Minor)</b>	2.1.1 (Critical)								
<b>Statement of Nonconformity:</b>	1. No written notification to DOE for fume hood has been done 2. DOE registered environmental audit has not been done as per requirement 3. Woman Working at Night Permit from Sabah Labor Department has not been acquired.								
<b>Requirement Reference:</b>	The Unit of Certification complies with legal requirements								
<b>Objective Evidence:</b>	Genting Sabapalm POM has not established evidence of compliance to legal requirements for: <ol style="list-style-type: none"> <li>No Written Notification to DOE under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 for one unit of Fume Hood located in Laboratory of Genting Sabapalm Oil Mill.</li> <li>Compliance Audit by DOE Registered Environmental Audit to conduct compliance audit at least 2 times a year as required by DOE License No. 005261 for period of 01/07/21-30/06/22 has not been conducted yet. This was also highlighted in Notis Arahan under Section 31(1) Environmental Quality Act 1974 to be done within 4 weeks from the notice dated 18/01/22 from DOE Sabah</li> <li>Sample of punch card has been taken for August, November 2021 and February 2022, and found out that 2 women workers (employment number E00606 and E11334) has been working more than 10pm for date as follow               <table border="1" style="margin-left: 20px; margin-top: 10px;"> <tbody> <tr> <td style="text-align: center;">E00606</td> <td style="text-align: center;">09/08/2021 15/08/2021</td> <td style="text-align: center;">23.52 00.28</td> </tr> <tr> <td style="text-align: center;">E11334</td> <td style="text-align: center;">13/08/2021 16/08/2021</td> <td style="text-align: center;">23.28 23.02</td> </tr> </tbody> </table> </li> </ol> <p>However, Genting Sabapalm Estate did not acquire the Woman Working at Night Permit from Sabah Labor Department.</p>			E00606	09/08/2021 15/08/2021	23.52 00.28	E11334	13/08/2021 16/08/2021	23.28 23.02
E00606	09/08/2021 15/08/2021	23.52 00.28							
E11334	13/08/2021 16/08/2021	23.28 23.02							
<b>Corrections:</b>	1. As the submission requires professional endorsement on the design, we will proceed to obtain quotation and approval on the submission. 2. Proceed with approval after obtaining another quotation and proceed to engage the best solution as our third party auditor.								

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	<ol style="list-style-type: none"> <li>3. Estate management to review and updating the HIRARC Checklist and activity for the risk and exposure on handling workers on any covid-19 issues as well as the usage of the mini / mid tractor grabber in the estate.</li> <li>4. To transfer the 2 female weighbridge operator from the estate check roll to the mill check roll starting April 2022.</li> </ol>
<p><b>Root Cause Analysis:</b></p>	<ol style="list-style-type: none"> <li>1. Ineffective mechanism to monitor compliance of legal requirements.</li> <li>2. The requirement for Fume Hood Notification to DOE not complied due to the requirement was not stated at the mill Legal Register. The mill PIC also not checking the requirements with DOE.</li> <li>3. Late in obtaining another quotation besides R &amp; K consultancy as company required minimum 2 quotations.</li> <li>4. No checking have been made due to the 2 female weighbridge operator recruited under the estate</li> <li>5. Estate management unaware of updating the HIRARC Checklist and activity on the risk and exposure of clinic staff to covid-19 from handling workers with symptoms, suspected patients, testing and disposal of RTK Test Kits.</li> </ol>
<p><b>Corrective Actions:</b></p>	<ol style="list-style-type: none"> <li>1. To update the Legal Register requirement.</li> <li>2. To prepare schedule for the Environmental Audit as monitoring tools together with other environmental compliance requirements</li> <li>3. Estate management to ensure HIRARC Checklist and activity for risk control and measures will be promptly reviewed and updated periodically.</li> <li>4. Estate management to request the grabber (Solaris) supplier to train the operator on the floating valve operation to allow the mini grabber extension arm, parked at the trailer during moving.</li> <li>5. The estate management to inform the mill if there is new recruitment for weighbridge operator to the mill for their information and action.</li> </ol>
<p><b>Assessment Conclusion:</b></p>	<ol style="list-style-type: none"> <li>1. Current fume hood did not have any document such as engineering drawing with IR Capex. Request for unbudgeted capex approval submitted on 26/05/2022 by the POM manager, Mr Elbert Tay Kuang Te and has been approved by Senior Vice President Group Processing, Mr James Chung Khim Hon. Quotation received from 3 different supplier and purchase order sighted dated 04/06/2022. Legal register updated to include written notification to DOE for Fume Hood.</li> <li>2. Legal register for environmental audit updated under Peraturan-Peraturan Kualiti Alam Sekeliling (Permis yang ditetapkan) (Minyak kelapa sawit mentah), 1977- P.U (A) 342/1977, in clause 42, to appoint DOE registered auditor to conduct 3<sup>rd</sup> party audit at least 2 times per year. Latest environmental audit has been done 16/04/2022 and the audit report sighted in the document "Environmental compliance audit report (1/2022), "Pematuhan syarat-syarat lesen premis minyak kelapa sawit mentah, jadual pematuhan No Lesen 005261, Genting Sabapalm POM" done by The Best Solution Sdn Bhd with 4 findings (1 AFI and 3 OFI) and submitted to Jabatan Alam Sekitar Negeri Sabah. Next audit has been scheduled on October 2022 and need to inform to Genting 2 weeks prior to the audit.</li> <li>3. Evidence sighted 2 workers has been transferred from estate to POM base on memo 14/04/2022 reference number GSPE/2022/04/056/THY/hs. The workers</li> </ol>

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	<p>has been included in the POM checkroll base on the document "Checkroll summary for the month of Apr-22"</p> <p>4. Briefing to contractor regarding safety and health compliance by safety officer for both contractor workers on 08/06/2022. Beside of that, all contract workers need to sign Borang Akuan Taklimat/Latihan Induksi as evidence that they already attended training. Signage has been set up and area has been barricade/ fenced up.</p> <p>Based on the evidence provided and the visit to the mill's effluent pond it was found that the corrections and corrective action plans have been addressed accordingly. Therefore, the Critical Non-Conformity is successfully closed on 05/07/2022.</p>
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	<ol style="list-style-type: none"> <li>1. Written notification to DOE for fume hood has been done by the management and records were available for verification.</li> <li>2. DOE registered environmental audit has been done as per DOE License - Compliance Schedule requirements. The audit reports were available for verification.</li> <li>3. It was verified based on the master list that here are 2 local female workers and 95 foreign female workers working in Genting Sabapalm Estate. These workers works as field workers and general workers. As per verification of sample pay slips and pocket check roll, it has been confirmed that there are no workers working at night. It has been further confirmed through interview with female workers during site visit that they are not required to work at night. Hence, the Major Non-conformities remain closed.</li> <li>4. HIRARC has been verified to be reviewed and updated on a yearly basis and as and when there are accidents or new operations in the operating units and on the effectiveness of the current risk controls. Checklist that are in place to monitor the HIRARC Risk Controls were being used and verified during the assessment.</li> </ol> <p>The continuous implementation of the CAP has been effective thus the Critical Non-conformity remains closed.</p>

Non-conformity			
<b>NCR Ref #</b>	2189110-202204-M2	<b>Issued Date</b>	15/04/2022
<b>Due Date</b>	15/07/2022	<b>Closure Date</b>	05/07/2022
<b>Indicator &amp; Category (Critical / Minor)</b>	3.6.1 (Critical)		
<b>Statement of Nonconformity:</b>	<ol style="list-style-type: none"> <li>1. Risk assessment for construction site has not been adequately assessed.</li> <li>2. Risk of clinic staff to COVID-19 has not been assessed</li> <li>3. Risk for mini/midi tractor grabber has not been adequately assessed.</li> </ol>		
<b>Requirement Reference:</b>	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
<b>Objective Evidence:</b>	<ol style="list-style-type: none"> <li>1. The hazard risk of exposure to children living adjacent to construction activity of 4 blocks of housing of Genting Sabapalm POM found not adequately controlled as no fencing/barricade and safety warning signage posted to avoid any unauthorized entrance and potential accident.</li> </ol>		

	<ol style="list-style-type: none"> <li>2. The risk and exposure of clinic staff to Covid-19 from activity of handling workers with symptoms, suspected patients and testing and disposal RTK Test Kits not identified and updated as verified from HIRARC Checklist and activity No. 25 Clinic, which was last reviewed on 16/03/18.</li> <li>3. While returning back from site visit sighted Mini/Midi Tractor Graber travelling on the road with grabber part hanging and swinging on the side of the road, hazardous to other traffic user. Further sampling on HIRAR Form NO. 42 dated 16/03/18 found the condition not identified and assessed for Mini/Midi Tractor Graber and no specific Safe Operation Procedure.</li> </ol>
<p><b>Corrections:</b></p>	<ol style="list-style-type: none"> <li>1. To call the contractor and conduct briefing regarding the requirements to comply with safety and health within the company premises. The project area to be barricade with proper signage.</li> <li>2. Estate management to review and updating the HIRARC Checklist and activity for the risk and exposure on handling workers on any COVID-19 issues as well as the usage of the mini / mid tractor grabber in the estate.</li> <li>3. All operator of mini/mid tractor grabber has been instructed to ensure the hanging and swinging part of the grabber must be cautiously set on the left side of the tractor or in the trailer at all time while travelling on the road.</li> </ol>
<p><b>Root Cause Analysis:</b></p>	<ol style="list-style-type: none"> <li>1. There is no monitoring conducted by the Mill personnel and Safety officer regarding the safety and health compliance to the contractor</li> <li>2. Estate management unaware of updating the HIRARC Checklist and activity on the risk and exposure of clinic staff to covid-19 from handling workers with symptoms, suspected patients, testing and disposal of RTK Test Kits.</li> <li>3. Estate management also overlooked on reviewing and updating the HIRARC Checklist and activity for using mini / mid grabber as sighted for Mini/Midi tractor Grabber travelling on the road with hanging and swinging on the side of the road which hazardous to the other traffic user.</li> </ol>
<p><b>Corrective Actions:</b></p>	<ol style="list-style-type: none"> <li>1. Future construction job HIRARC and/or Job Risk Assessment submitted to management before allowed to start and SHO to conduct training to mill personnel and to verify the contractor Job Risk Assessment prior to the commencing of work.</li> <li>2. Estate management to ensure HIRARC Checklist and activity for risk control and measures will be promptly reviewed and updated periodically.</li> <li>3. Estate management to request the grabber (Solaris) supplier to train the operator on the floating valve operation to allow the mini grabber extension arm, parked at the trailer during moving.</li> </ol>
<p><b>Assessment Conclusion:</b></p>	<ol style="list-style-type: none"> <li>1. Hazard risk assessment (HIRARC) for mini/midi updated on 28/04/2022 title Pengoperasian grabber assessed by Mr Frederick Francis with 3 other members, Mr Eshwar A/L Ganeshparan, Rayner Dominic and Malini Bolokan and approved by Mr Tan Yeong Huat. As per assessment, it has been identified the grabber position while moving, stated in the risk assessment, SOP will be established and to conduct training for all mini/midi operator.  New SOPs established in the document title "Prosedur Kerja Selamat, Pengoperasin tractor grabber" dated June 2022. Stated in the SOPs, while travelling, grabber need to be placed at the left site of the mini/midi or at the back of trailer.</li> </ol>



	<p>Training records sighted for grabber operator on 04/07/2022 done Mr Lim Chai Huat, title Latihan Keselamatan, SOP &amp; Teknikal attended by 21 operator.</p> <p>2. Risk assessment for clinic updated on 23/04/2022 title "Klinik Ladang" assessed by Mr Frederick Francis with 3 other members, Mr Eshwar A/L Ganeshparan, Rayner Dominic and Malini Bolokan and approved by Mr Tan Yeong Huat. Risk assessment for COVID 19 checkup which stated risk control is to conduct training for HA proper ways to do RTK test. Training conducted in 27/06/2022 done by Puan Malini Bolokan Bansinai, hospital assistant.</p>
<p><b>Effectiveness Closure (for previous audit closed Critical NC):</b></p>	<ol style="list-style-type: none"> <li>1. The construction activity of 4 blocks of housing of Genting Sabapalm POM was completed. SHO has conducted training to mill personnel and to verify the contractor Job Risk Assessment prior to the commencing of work.</li> <li>2. HIRARC Checklist and activity for the risk and exposure on handling workers on any COVID-19 was revised and updated accordingly as verified.</li> <li>3. As verified found all grabber was modified with action to revised the related HIRARC for mini/midi updated on 28/04/2022 title <i>Pengoperasian Grabber</i> approved by Mr Tan Yeong Huat (Sr. Estate Manager).</li> <li>4. The HIRARC was verified to include all operations in the estate and mill. All newly introduced operations and constructions have also been developed the specific HIRARC. Sampled on accidents that have occurred in the estate and mills and conformed that the HIRARC has been reviewed with revised scores.</li> </ol> <p>The continuous implementation of the CAP has been effective thus the Critical Non-conformity remains closed.</p>

<b>Non-conformity</b>			
<b>NCR Ref #</b>	2189110-202204-N1	<b>Issued Date</b>	15/04/2023
<b>Due Date</b>	13/07/2023	<b>Closure Date</b>	Escalated to Critical NC
<b>Indicator &amp; Category (Critical / Minor)</b>	2.2.2 (Minor)		
<b>Statement of Nonconformity:</b>	Agreement with the FFB supplier did not contain clauses on meeting applicable legal requirements and Canteen/Grocery store unable to demonstrated compliance to legal requirement		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available		
<b>Objective Evidence:</b>	<p><b><u>Genting Sabapalm POM</u></b></p> <p>Total 238 smallholders listed in the list of stakeholders for both active and inactive supplier. Samples of agreement have been taken and verified. However, the agreement did not contain on meeting applicable legal requirements.</p> <p><b><u>Genting Sabapalm Estate</u></b></p> <p>There are 4 canteen/grocery store operated in the Genting Sabapalm Estate line sites and has been included in the stakeholders list.</p>		

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	<p>However, it has been sighted that the shop operates using business licenses for another shop in Telupid Town. It also sighted that; the shop sells LPG gas to workers without any permit and in compliance with Akta Kawalan Bekalan 1961 . The contractor unable to demonstrate compliance to legal requirement, thus, non-conformities has been raised</p>
<p><b>Corrections:</b></p>	<ol style="list-style-type: none"> <li>1. Re-circulate questionnaire on matters regarding meeting applicable legal requirements to existing FFB suppliers</li> <li>2. To conduct meeting with shop owners to make them aware of the need for permits to sell cylinder gas and to make necessary changes to their licenses i.e. to add GSPE address to their licenses</li> </ol>
<p><b>Root Cause Analysis:</b></p>	<ol style="list-style-type: none"> <li>1. The requirement to include the clauses of meeting applicable legal requirements was not done due to the 238 smallholders have no seal Memorandum Of Agreements (MOA) with the mill. They are free to sell their crops to any mill or collecting center nearby.</li> <li>2. Sundry shop owners were not aware of the need to attain license from authorities for sale of cylinder gas and the need to add an additional address to their current business license</li> </ol>
<p><b>Corrective Actions:</b></p>	<ol style="list-style-type: none"> <li>1. The newly amended smallholder questioner will be used for the newly engage FFB supplier in future</li> <li>2. Estate management will ensure that shop owners that do not acquire permits will not be allowed to sell gas cylinders. Meeting with shop owners have been conducted and shop owners who wish to sell gas cylinders have been notified that they must acquire proper permits. Shop owners have also been notified to update their business licenses by adding GSPE address to them and displaying them at their respective shops.</li> </ol>
<p><b>Assessment Conclusion:</b></p>	<p><u>Genting Sabapalm POM</u> List of FFB supplier maintained in the list of stakeholders updated on May 2023 and the numbers of smallholders decreased from 238 to 219 compare to last year due to inactive smallholders removed from the list. Sample smallholders' agreement taken and verified which included contain specific clauses on meeting applicable legal requirements in the New FFB supplier questionnaire document number PM-MKT04-F01-1. As per interview with smallholders during the stakeholder's consultation confirmed that new agreement has been signed and they can demonstrate their understanding on legal compliance requirement.</p> <p><u>Genting Sabapalm Estate</u> Meeting with sundry shops owner has been done during the internal stakeholders consultation conducted on 29/03/2023 with attendance of all owners of sundry shops and restaurant which they has been communicated on the need of having licenses to sell LPG. As per site visit to 3 shops, it has been confirmed there is no longer LPG has been sold.</p> <p>Business licences for all 3 shops has been verified. Details as per below</p> <ol style="list-style-type: none"> <li>1. MXXXXXXX TXXXXXX; R41307/2020, Shops location: Lot 7, Block M Tingkat Bawah Bandar Letat Jaya, Batu 04, Jalan Lintas Utara, Sandakan</li> <li>2. WXXXXX SXXXX, Reference Number BLN/2023/1128, Shop Location: Kampung</li> </ol>

	<p>Tagas-Tagas, Peti Surat 28, 90107, Beluran Sabah.</p> <p>Verification to close minor non-conformities found out there is still business licenses that used address for other places. Details as per below</p> <ul style="list-style-type: none"> <li>- MXXXXXXX TXXXXXX; R41307/2020, Shops location: Lot 7, block M Tingkat Bawah Bandar Letat Jaya, Batu 04, Jalan Lintas Utara, Sandakan</li> </ul> <p>Due to reoccurrence of same issues for the same indicator, minor non-conformity will be escalated to critical non-conformity.</p>
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Non-conformity			
<b>NCR Ref #</b>	2189110-202204-N2	<b>Issued Date</b>	15/04/2023
<b>Due Date</b>	13/07/2023	<b>Closure Date</b>	13/07/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	2.2.3 (Minor)		
<b>Statement of Nonconformity:</b>	Agreement with FFB Supplier did not contain clauses disallowing child, forced and trafficked labour and where young workers are employed, include a clause for their protection.		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.		
<b>Objective Evidence:</b>	<p><b><u>Genting Sabapalm POM</u></b></p> <p>Total 238 smallholders listed in the list of stakeholders for both active and inactive supplier. Samples of agreement have been taken and verified. However, the agreement did not contain clauses disallowing child, forced and trafficked labour.</p>		
<b>Corrections:</b>	Re-circulate questionnaire on matters regarding meeting applicable legal requirements to existing FFB suppliers		
<b>Root Cause Analysis:</b>	The requirement to include the clauses of meeting applicable legal requirements was not done due to the 238 smallholders have no seal Memorandum Of Agreements (MOA) with the mill. They are free to sell their crops to any mill or collecting center nearby.		
<b>Corrective Actions:</b>	The newly amended smallholder questioner will be used for the newly engage FFB supplier in future.		
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. List of FFB supplier maintained in the list of stakeholders updated on May 2023 and the numbers of smallholders decreased from 238 to 219 compare to last year due to inactive smallholders removed from the list. Sample smallholders' agreement taken and verified which included clauses disallowing child, forced and trafficked labour.</li> <li>2. The mill has established a questionnaire, attached and verified in the FFB Supplier's file. The questionnaire includes matters regarding legal requirements, contract agreement and monitoring on child, forced and trafficked labour.</li> </ol> <p>The implementation of the CAP was deemed to be effective and thus the minor non-conformity was effectively closed on 13/07/2023.</p>		

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<b>Non-conformity</b>			
<b>NCR Ref #</b>	2189110-202204-N3	<b>Issued Date</b>	15/04/2023
<b>Due Date</b>	13/07/2023	<b>Closure Date</b>	13/07/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	3.4.2 (Minor)		
<b>Statement of Nonconformity:</b>	The SEIA and Environmental Management Plans have not been developed adequately.		
<b>Requirement Reference:</b>	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.		
<b>Objective Evidence:</b>	<ol style="list-style-type: none"> <li>1. Environmental Aspect and Impact Assessment (EAI) was updated on 08/02/2022. Sighted the construction of New Linesite at Sapi Division, Genting Sabapalm Estate. Nevertheless, the Social and Environmental Aspects and Impacts were not identified in the EAI.</li> <li>2. The HCV Management Plan have been established. Nevertheless, the HCV Management and Monitoring Plan have not identified the Bangkawat River Buffer zone as an area to be conserved. Visit to the area indicated that there were no clear establishment of buffer zones along the river areas and operational works were ongoing as normal.</li> <li>3. Recommendation of the negative issues that has been highlighted has been stated in the same document Social impact assessment report. Stated in the recommendation for that issues are to communicate the issues during the committee meeting and explanation on the process of application. However, there is no evidence management plan has been developed in participatory ways and monitoring plan has been established. Thus, non-conformities have been raised.</li> </ol>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Estate management to immediately review and update the construction of the New Linesite at Sapi Division in the EAI</li> <li>2. A clear signage and marking of buffer zone has been established along the Bangkawat Rivers as well as re-training to respective workers for awareness.</li> <li>3. The management plan in participatory ways for committee meeting has been reviewed and updated for Social Impact Assessment report</li> </ol>		
<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>1. Estate management unaware to update the Social and Environment Aspects and Impacts of the construction of new linesite at Sapi Division, Genting Sabapalm Estate in the EAI.</li> <li>2. Estate management overlooked on the HCV Management and Monitoring Plan for Bangkawat River Buffer zone as an area to be conserved.</li> <li>3. Estate management also not develop the management plan in participatory ways and monitoring plan in the same document of Social Impact Assessment report.</li> </ol>		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Estate management to immediately review and update of any activity related to environment in the EAI</li> <li>2. Estate to ensure to maintain a clear signage and marking of buffer zone along the Bangkawat Rivers as well as re-training to respective workers for awareness.</li> </ol>		

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	<ol style="list-style-type: none"> <li>3. Estate to ensure to develop the management plan in participatory ways for committee meeting and updating the process of application.</li> <li>4. The management will conduct training to all personnel in order to communicate requirement on social/environmental impact assessment.</li> </ol>
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. Social impact assessment for the new construction has been established in participatory ways which stakeholders has been consulted during the stakeholder meeting and workers during the workers representative meeting. Training to all personnel conducted on 19/12/2022 with attendance of staff and executive.</li> <li>2. Bangkawat River has been included in the HCV Management Plan and the mitigation methods have been established as well. Visit to the site indicated that signages have been erected stating the conservation plans and the prohibition of operations such as agrochemicals and fertiliser application. A buffer has been demarcated and established along the river as well.</li> </ol> <p>The implementation of the CAP was deemed to be effective and thus the minor non-conformity was effectively closed on 13/07/2023.</p>

<b>Opportunity for Improvement</b>	
<b>OFI#</b>	<b>Description</b>
<b>OFI 1</b>	<p>Indicator 2.1.1 2189110-202204-I1</p> <p>Genting Sabapalm Oil Mill to further ensure the capacity and enhance condition of bunding built for diesel storage tanks (16,000 litres each) as Guidelines of Storage of Hazardous Substance located in the mill and enhance warning sign of non-smoking as requirement of Jabatan Bomba dan Penyelamat Malaysia.</p> <p><b>Verification / Follow-up actions:</b> The bunding was modified with piping made to divert potential spillage to adjacent existing bunding built for others diesel storage tanks</p>
<b>OFI 2</b>	<p>Indicator 6.1.5 2189110-202204-I2</p> <p>Gender Committee has been established for both POM and estates and has been name as Ahli Jawatan Kuasa Wanita dan Kanak- Kanak. Establishment of the committee can be further improved with activities/planning related to children development and awareness on importance of education.</p> <p><b>Verification / Follow-up actions:</b> Gender committee for Genting Sabapalm POM is in place where a committee has been established can be sighted in the organization where Pn. SXXXXXX MXXXXX has been appointed chairman and Puan LXXX CXXXXXXX as secretary. As per interview with Pn SXXXXXXXX MXXXXX, the objective of establishment of gender committee is mechanism for communication, channel for grievances, activities to established good relationships between female workers, educational purposes. Latest activities conducted is sports day female and children and colouring competition on 26/11/2022. Female health check-up also has been done by estate hospital assistant and attended by all female workers. Children development and awareness on importance of education activities included in the management plan has been planned to be conducted in November 2023.</p>

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<b>OFI 3</b>	<p>Indicator 1.1.3</p> <p>2189110-202204-I3</p> <p>Good social contribution has been done and all request has been responded by the management to all stakeholders. It can be further improved by identifying effective channel to communicate the status of the request by the stakeholders</p> <p><b>Verification / Follow-up actions:</b></p> <p>There is evidence that any contribution has been made has been communicated back/responded to the requester through message system/email and has been job done in the request book.</p>
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**3.3.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1929260-202007-M1	Critical	2.3.1	09/07/2020	Closed out on 05/10/2020
1929260-202007-M2	Critical	4.1.1	09/07/2020	Closed out on 05/10/2020
1929260-202007-M3	Critical	6.2.3	09/07/2020	Closed out on 05/10/2020
1929260-202007-M4	Critical	6.5.2	09/07/2020	Closed out on 05/10/2020
1929260-202007-N1	Minor	1.1.5	09/07/2020	Closed out on 02/06/2021
1929260-202007-N2	Minor	3.3.2	09/07/2020	Closed out on 02/06/2021
1929260-202007-N3	Minor	3.4.2	09/07/2020	Closed out on 02/06/2021
1929260-202007-N4	Minor	3.5.1	09/07/2020	Closed out on 02/06/2021
1929260-202007-N5	Minor	5.2.2	09/07/2020	Closed out on 02/06/2021
1929260-202007-N6	Minor	6.5.3	09/07/2020	Closed out on 02/06/2021
1929260-202007-N7	Minor	7.11.3	09/07/2020	Closed out on 02/06/2021
2189110-202204-M1	Critical	2.1.1	15/04/2022	Closed out on 15/07/2022
2189110-202204-M2	Critical	3.6.1	15/04/2022	Closed out on 15/07/2022
2189110-202204-N1	Minor	2.2.2	15/04/2022	Escalated to Critical NC
2189110-202204-N2	Minor	2.2.3	15/04/2022	Closed out on 13/07/2023
2189110-202204-N3	Minor	3.4.2	15/04/2022	Closed out on 13/07/2023
2367634-202307-M1	Critical	2.2.2	13/07/2023	Closed out on 18/09/2023
2367634-202307-N1	Minor	4.2.3	13/07/2023	"Open"
2367634-202307-N2	Minor	3.3.2	13/07/2023	"Open"
2367634-202307-N3	Minor	7.8.3	13/07/2023	"Open"

### 3.4 Stakeholders and previous land owner / user 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 Oil Mills (Sabah) Sdn Bhd – Genting Sabapalm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal Stakeholders	Worker’s representative	Face to Face
External Stakeholders	SMK Pamol - Representative	Face to Face
Communities	Kampung Klagan Baru – Village Head	Face to Face
Contractor	SXXXXXXXX CX EXXXXXXXXXX	Face to Face
Contractors – Suppliers	FFB Suppliers & Smallholders	Face to Face
Internal Stakeholders	Gender Committee - Representative	Face to Face

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks:</b> Worker’s representative, Genting Sabapalm POM and Genting Sabapalm Estate</p> <p>As per interview with worker’s representative mentioned that they have been elected through election that has been conducted without interference of the management. He said all workers and staff can join the workers union if available. As per interview, all workers representatives can demonstrate their understanding on their roles and responsibilities and as part of mechanism to workers grievance.</p> <p>As interview, the workers representative mentioned that during the workers representative meeting last year, they requested to conducted sport event and has been planned respond by the management which has been planned in August 2023 during the Independence Day celebration.</p> <p><b>Audit Team verification and response:</b> No further verification required</p>
<b>2</b>	<p><b>Feedbacks:</b> Penolong Kanan - SMK Pamol</p> <p>SMK Pamol is located around 10km from the Genting Sabapalm POM and estate and most of the kids in Genting Sabapalm certification units are going to SMK Pamol. The management of SMK Pamol confirm that good relationships has been maintained by both parties where estate has provided contribution in term of</p>

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	<p>man power and expenses for any school activities. Complaint procedure and consultation procedure has been communicated to them during the stakeholders meeting.</p> <p><b>Audit Team verification and response:</b> No further verification required.</p>
3	<p><b>Feedbacks:</b> Local communities (Kampung Klagan Baru)</p> <p>Head of village for Kampung Klagan Baru has been interviewed. As mentioned, most of the villagers works as, village works and own their own oil palms farm and with Genting Plantation Berhad. Based on the on the interview, it has been confirmed that good relationships have been between both parties. They also mentioned that there are no operation/ activities in estates and POM that give adverse effect to the local communities. Any vacancies in estate/POM will be posted at notice board and nearby coffee shops at the village area. As per interview, some villagers work in the estate and POM. There is no cases of pollution has happen and identified by the villagers. There is also no issues of land dispute/ customary right land in Genting Sabapalm Estate/ POM which has been confirmed by head of village who already reside at that area since kids. There are a lot contribution has been made by the estate/POM to the local communities such as roads repair, supplying water.</p> <p><b>Audit Team verification and response:</b> No further verification required.</p>
4	<p><b>Feedbacks:</b> SXXXXXXXX CX EXXXXXXXXX</p> <p>Based on interview, the contractor agreed good relationship has been established between management and contractors. The contractor also mentioned that the payment paid before 15 days of invoices received as per terms and conditions. Contractor was being briefed regarding RSPO &amp; MSPO during stakeholders meeting. All workers recruited is local workers and SOCSO and EPF contribution made by the contractors itself.</p> <p><b>Audit Team verification and response:</b> No further verification required.</p>
5	<p><b>Feedbacks:</b> FFB supplier, smallholders</p> <p>As per interview with FFB supplier, there is evidence FFB pricing has been communicate and explain to all FFB supplier and also has been posted at the weighbridge stations. Payment will be paid through bank transaction before 7<sup>th</sup> every month and there is no issues of payment raised and been paid as per weighbridge tickets. There is deduction will be made for unripe bunches and will be taken back by the FFB supplier. The management of Genting Sabapalm Estate also has communicate on certification and will support if there is any technical assistance required.</p> <p><b>Audit Team verification and response:</b> No further verification required.</p>
6	<p><b>Feedbacks:</b> Gender committee</p> <p>4 gender representatives for each operating have been interviewed. Based on the interview, there is evidence that all female workers can participate in gender committee and has been invited for meeting that will be conducted every 6 months. As per interview, it has been confirmed that grievance procedure for any harassment has been communicated and all representatives can demonstrate their understanding on the procedure. Other than that, pregnancy test has not been conducted for female workers but only self-assessment on pregnant symptom such as period delay will be submitted online on monthly basis. Representative also has been asked on discrimination and has been confirmed there is no discrimination has been practiced. All female workers received same benefits, leave and others. New mother assessment has been conducted for each operating units and has been confirmed by one of representative which also new mother.</p> <p><b>Audit Team verification and response:</b> No further verification required.</p>

<b>List of land owner / user contacted</b>
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Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not Applicable as Genting Sabapalm Certification Unit have already undergone 2 <sup>nd</sup> Cycle of Replanting					

Previous land owner / user comment	
NA	<b>Feedbacks: -</b>
	<b>Audit Team verification and response: -</b>

**3.5 Impartiality and conflict of interest**

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

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**Formal Signing-off of Assessment Conclusion and Recommendation**

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Genting Oil Mills (Sabah) Sdn Bhd – Genting Sabapalm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Genting Oil Mills (Sabah) Sdn Bhd – Genting Sabapalm Oil Mill is remain certified.

Report prepared by	Acceptance of Assessment Conclusion	
<b>Name:</b> VIJAY KANNA PAKIRISAMY	<b>Name:</b> Abdul Rahim Wilson Abdullah	<b>Name:</b> James Chung Khim Hon
<b>Company Name:</b> BSI SERVICES (MALAYSIA) SDN BHD	<b>Company Name:</b> Genting Plantations Berhad	<b>Company Name:</b> Genting Plantations Berhad
<b>Title:</b> CLIENT MANAGER	<b>Title:</b> Vice President - Plantation- Region 2	<b>Title:</b> Senior Vice President- Group Processing
<b>Signature:</b> 	<b>Signature:</b> <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> 	<b>Signature:</b> <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> 
<b>Date:</b> 21/09/2023	<b>Date:</b> 21/09/2023	<b>Date:</b> 21/09/2023

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1:</b> The unit of certification provides 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	<p><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm POM and Estate has specified documents that are publicly available and has been documented in the communication procedure where stated list of documents that are publicly available. The documents are available in the company website and operating unit’s noticeboards and can be requested by the stakeholders at the respective management unit’s office. As per verification, all documents that specified in the RSPO P&amp;C have been classified as publicly available. Samples of document that has been verified such as land titles, Company Policies, HCV Reports and Management Plans.</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>There is evidence that information has been provided in Bahasa Malaysia and English. It has been verified based on the document review. As per verification, all document that classified as publicly available has been documented in Bahasa Malaysia and English. As per stated in the consultation and communication procedure, explanation will be given by the person in charge if the requester is using other than Bahasa Malaysia and English.</p>	Complied
1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>There is no information request received for 2022 and 2023 and this has been confirmed based on interviews with sampled stakeholders. Genting Sabapalm POM and estate only received assistance/contribution request that has been maintained in the file “CSR (Corporate social responsibility) incentives”. Sample of assistance request received by the management is for water supply</p>	Complied

		from the nearby local communities and also donation for school activities.	
1.1.4	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad adopt the same procedure as documented in the document Sustainability Management Procedure for Consultation and Communication; SMP-GPB-17; Rev. 02; Date: 23/02/2018. There is evidence that the procedure has been disclosed and communicate to all stakeholders during the stakeholders` consultation meeting, that has been conducted on the on 11/05/2023 where attended by various stakeholders. It also has been posted at the notice board.</p> <p>Implementation of the procedure has verified base on the communication records, stakeholders consultation minutes meetings and interview with stakeholders . It has been confirmed by stakeholders confirmed that communication and consultation will be through social liaison and will be responded timely manner.</p> <p>There is evidence that implementation of the procedure base on sample request as follow,</p> <ol style="list-style-type: none"> <li>a. Request from SK Sabapalm for grass cutting at school filed on 16/10/2022 reference number SKLS.200-3/1/5(12) and responded on 18/10/2022.</li> <li>b. Request from SMK Pamol for contribution of school equipment dated 11/04/2023 and responded on 12/04/2023 that this request will be forwarded to General Manager for approval on 30/06/2023.</li> </ol>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>List of stakeholders has been maintained by both Genting Sabapalm Estate and POM and has been documented in the document title "Internal list of stakeholders" and "External list of stakeholders" which latest has been updated on May 2023. For internal stakeholders, it is included, workers representative, OSH committee, gender committee, and auxiliary police. While for</p>	Complied

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		external, it is included village, government bodies, supplier and contractors. Information that has been included is address, emails, telephone number and representatives. For village, total 4 villages have been listed which are Kampung Tembidong-bidong, Kampung Tagas-Tagas, Kampung Klagan Lama and Kampung Bambang. While for contractor, there 5 contractors has been listed and verified.	
<b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	Genting Plantations Berhad adopts the same policy for ethical conduct as per documented in the document "The Ethical Conduct and Integrity Policy" signed by President & COO dated 22/06/2015 and it was communicated to the stakeholders including contractors and third party.  As per stated in the policy, any Genting Plantations Berhad executive, and staff found did not comply with the policy will be investigate by the management. As per interview with the management for each operating units can demonstrate their understanding on the policy. Sample of implementation has been taken for dealing with contractors and suppliers where it has been verified that payment has been made according as per contract base on the May 2023 and January 2023 payment records. It was verified that there is no issues of incompliance of the policy. Tendering process sighed for 2 contractors which are GXX-X CXXXXXXXXXX (Construction of staff quarters), 14/09/2021 and SXXXXXXXX CX (Replanting) which has been done by tender committee-secretary	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	System to monitor compliance and the implementation of the policy established through the finance internal audit RSPO conducted by internal audit department (IAD) on 12/04/2023 until 09/05/2023 which total 6 findings has been raised. There is no issues on ethical conduct has been raised. Other than that, RSPO internal audit has	Complied

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		been conducted on annual basis which latest conducted on 19-21/06/2023 by Mr Pawatang Pamalu and Mr Ronlie Ronney from sustainability department. Total 3 Major, 1 Minor and 4 observations has been raised. There is no issues on ethical conduct has been raised.	
<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<b>(C)</b> The Unit of Certification complies with legal requirements - Critical (Major) compliance -	<p>Established List of License, Written Approvals and Permits, Competency &amp; Legal Monitoring dated 05/07/2023 and stated evidence of compliancy to the legal and other requirement as follows:</p> <p><u>Genting Sabapalm Oil Mill</u></p> <ul style="list-style-type: none"> <li>- MPOB License; License No: 620051004000 valid from 01/03/2023 - 28/02/2024.</li> <li>- Weighbridge certificate under <i>Akta Timbang dan Sukat 1972 and Peraturan Timbang dan Sukat 1981</i>, done by Metrology Corporation Malaysia; No B1200052 and B120051 valid until date 17/06/2024.</li> <li>- Power Generation License (Form F) from <i>Suruhanjaya Tenaga</i> under Electrical Services Act 1990 for 4 units of gensets (Serial No. 49194, Mitsubishi, Turbine Genset 1, Turbine Genset 2) with total power aggregate: 1810 kWh, valid from 22/03/2023 - 21/03/2024.</li> <li>- The Genset having Written Notification under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014. Diesel Permit Ref No. KPDHEP.SDN.18/2021(SK) for Genting Oil Mill (Sabah) Sdn Bhd located at Genting Sabapalm Oil Mill valid from 30/09/2021 - 29/09/2024.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- Fire Certificate No. JBPM:SB/7/180/2021 for Genting Sabapalm Oil Mill valid from 29/10/2021 - 28/10/2024.</li> <li>- JTK Permit for hiring foreign workers under Section 118 Sabah Labour Ordinance (Sabah Bab 67). Semenanjung : 1, Indonesian: 16 • JTK Permit for restriction of overtime more than 120 hours. Valid from 23/09/2022-23/09/2024.</li> <li>- JTK Permit for Female Working at Night under Section 75 Sabah Labour Ordinance (Sabah Bab 67) valid from 23/02/2022-25/09/2024.</li> <li>- JTK Permit for deduction of salary under Section 113(4) Sabah Labour Ordinance (Sabah Bab 67) for Passport Payment valid from 30/06/2021 - 29/06/2023. (Ongoing as consulted and confirmed with JTK).</li> <li>- Stack Emission Monitoring Report for Lab Fume Hood conducted by Dynakey Laboratories Sdn Bhd on June 2023.</li> <li>- Mill has prepared a drawing to be submitted to DOE Notification for Fume Hood. The drawing was verified and available.</li> <li>- Noise Risk Assessment was conducted by Sheman Services and Supply on 15-16/04/2021. As a result, 15 out of 20 selected representatives recorded exposure to excessive level (82 dBA) such as Boiler, Capstan, Grass Cutter. Engine Room, Kernel Plant, Loading Ramp, Lab, Oil Room and Press Machine.</li> <li>- Audiometric Test was conducted by DAB OH Sdn. Bhd on 17/04/2023 for 43 workers. 41 having normal hearing and 2 with abnormal hearing.</li> <li>- Chemical Health Risk Assessment (CHRA) was conducted by Rehpro Scientific Sdn. Bhd. on 23/11/2020.</li> <li>- DOE License; License No. 005261 under Section 18(1) EQA expired on 30/06/2023 and renewed 1974 as payment</li> </ul>	
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		<p>requested on 24/03/2023 from Renewal Letter received from DOE, Sabah dated 25/05/2023 (Ref No. JAS.SSK.600-3/1/3).</p> <p><u>Genting Sabapalm Estate</u></p> <p>In Genting Sabapalm Estate available a List of Application License and Permit as at June 2023 and evidence of compliance below:</p> <ul style="list-style-type: none"> <li>- MPOB License No. 523495002000 valid till 30/09/2023</li> <li>- CF for Air Compressor PMT SB 2251377 valid till 17/07/2023.</li> <li>- <i>Permit Pemotongan Gaji JTK untuk Kos Bayaran Perubatan</i>; Reference No. JTKSB/PMT/113/2022/0056 valid till 30/03/2024.</li> <li>- License to Employ Foreign Worker under Sect 118, Sabah Labour Ordinance (Bab 67) (Indonesia:330, Philippines: 3, Peninsular Malaysia:3) JTK.11.SDK600-4/1/01261/005604, valid till 01/10/2023.</li> <li>- License to Practice Dresser (Grade 1) No 117 valid till 29/09/2023.</li> </ul>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Genting Sabapalm POM and estate established a Legal Register (SP-MGR-03-F01) Reviewed Jan-Dec 2023. Listed among others:</p> <ul style="list-style-type: none"> <li>- Occupational Safety and Health Act 1994 and its subsidiary Regulations</li> <li>- Poison Acts 1952 and its subsidiary Regulations.</li> <li>- Fire Services Act 1988 and its Regulations.</li> <li>- Electrical Supply Act 1990</li> <li>- Environmental Quality Act 1974 and its Regulations.</li> <li>- Custom Act 1967</li> <li>- Weight and Measurement Act 1972</li> <li>- Labour Ordinance (Sabah Cap 67) 2005.</li> </ul>	Complied



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		<p>Sighted legal changes not printed yet but found updated in Legal Register by Sustainability Unit:</p> <ul style="list-style-type: none"> <li>- Fire Services (Fire Certificate) (Amendment) Regulations 2020.</li> <li>- Fire Services (Designated Premise) Orders 2020.</li> </ul>	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Sighted in Sabapalm Estate, established an Estate Boundary Stone and Peg Location last updated 27/07/2015. A total of 82 boundary stone has been established in the estate area. During site visit sighted a Boundary Stone located at Block 9B. Pegging has been done with pole for those original boundary stone that has not been identified.</p>	Complied
<p><b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>List of contracted parties has been maintained by both operating units and latest updated on February 2023 for Genting Sabapalm POM and May 2023 for Genting Sabapalm Estate. For Genting Sabapalm POM, there are 2 contracted parties which CPO and PK transporter which contracted between Genting Oil Mills (Sabah) Sdn Bhd and sundry shops.</p> <p>While for Genting Sabapalm Estate, there 5 contractors and 3 shops which are FFB Transporters, Machinery Contractors, Sundry Shops and Canteen.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p><u>Genting Sabapalm POM</u></p> <p>List of FFB supplier maintained in the list of stakeholders updated on May 2023 and the numbers of smallholders decreased from 238 to 219 compare to last year due to inactive smallholders removed from the list. Sample smallholders' agreement taken and verified which included contain specific clauses on meeting applicable legal requirements in the New FFB supplier questionnaire document</p>	Non-compliance

		<p>number PM-MKT04-F01-1.</p> <p>As per interview with smallholders during the stakeholder’s consultation confirmed that new agreement has been signed and they can demonstrate their understanding on legal compliance requirement.</p> <p><u>Genting Sabapalm Estate</u></p> <p>Meeting with sundry shops owner has been done during the internal stakeholders consultation conducted on 29/03/2023 with attendance of all owners of sundry shops and restaurant which they has been communicated on the need of having licenses to sell LPG. As per site visit to 3 shops, it has been confirmed there is no longer LPG has been sold.</p> <p>Business licences for all 3 shops has been verified. Details as per below</p> <ol style="list-style-type: none"> <li>3. MXXXXXXX TXXXXXX; R41307/2020, Shops location: Lot 7, Block M Tingkat Bawah Bandar Letat Jaya, Batu 04, Jalan Lintas Utara, Sandakan</li> <li>4. WXXXXX SXXXX, Reference Number BLN/2023/1128, Shop Location: Kampung Tagas-Tagas, Peti Surat 28, 90107, Beluran Sabah.</li> </ol> <p>Verification to close minor non-conformities found out there is still business licenses that used address for other places. Details as per below</p> <ul style="list-style-type: none"> <li>– MXXXXXXX TXXXXXX; R41307/2020, Shops location: Lot 7, block M Tingkat Bawah Bandar Letat Jaya, Batu 04, Jalan Lintas Utara, Sandakan</li> </ul>	
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		Due to reoccurrence of same issues for the same indicator, minor non-conformity will be escalated to critical non-conformity.	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>List of FFB supplier maintained in the list of stakeholders updated on May 2023 and the numbers of smallholders decreased from 238 to 219 compare to last year due to inactive smallholders removed from the list. Sample smallholders’ agreement taken and verified which included contain specific clauses on labour which prohibition of child, force and trafficked labor in the New FFB supplier questionnaire document number PM-MKT04-F01-1.</p> <p>As per interview with smallholders during the stakeholder’s consultation confirmed that new agreement has been signed and they can demonstrate their understanding on legal compliance requirement.</p> <p>While for contractors, there is only 1 contractor on Genting Sabapalm POM which is NXX GXX CXXXXXXXXXX, agreement signed on 04/07/2022 for construction of workers quarters works document number CD/GPB/2022-12/GSOM-01 and for Genting Sabapalm Estate, sample of 2 contractors, SXXXXXXXX TXX HXXX Transport agreement number GSPE/FFB/23/01/02 and HXX KXX EXXXXXXXXX agreement number GSPE/FFB/23/01/01.</p> <p>All contract agreement clearly stated clauses disallowing child, forced trafficked labour and if there is young workers employed, they must be protected.</p>	Complied
<p><b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> </ul>	<p>A list of all directly sourced FFB is available for verification in the Genting Sabapalm Oil Mill List of Stakeholder: FFB Supplier. It has the information about names of the suppliers, address, contact number, contact person, MPOB License, Land Title Documents and information on geo-location.</p>	Complied

	<ul style="list-style-type: none"> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm receives RSPO certified FFB from its own estates which is Genting Sabapalm Estate. The mill also receives FFB from Outgrowers and smallholders registered from outside the certification scope. The information related to the third party FFB suppliers were available and sampled as below:</p> <ol style="list-style-type: none"> <li>1. XXX; Land Area: 2649.33 Ha; MPOB License: 50346152000; License Expiry Date: 28/08/2025.</li> <li>2. XXX; Land Area: 444.90 Ha; MPOB License: 581848002000; License Expiry Date: 29/02/2024.</li> <li>3. XXX; Land Area: 5.18 Ha; MPOB License: 317797501000; License Expiry Date: 30/09/2025.</li> <li>4. XXX; Land Area: 1.62 Ha; MPOB License: 418731601000; License Expiry Date: 30/04/2028.</li> </ol>	
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>At the moment the mill does not receive any indirectly sourced FFB. All FFB are sent directly from estates or smallholders. Therefore, this indicator is not applicable during this assessment.</p>	Not Applicable
<p><b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b></p>			
<p><b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>In Sabapalm POM sighted Capital Expenditure Details for Fiscal Year 2023, Version: V01 (01/01/2023 - 31/12/2023). Established Projection Data from Year 2022 to 2031 that included:</p> <ol style="list-style-type: none"> <li>a. FFB Forecast (Internal and external sources)</li> <li>b. Mill capacity (Utilization)</li> </ol> <p>In Genting Sabapalm Estate sighted the established Business Management Plan for FY22/23 with 5-year projection plan for (2023</p>	Complied

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		to 2027) which includes on Replanting Area, Replanting Expenditure, Plant machinery, Road & Bridges and Capital Expenditures amongst others.	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	Genting Sabapalm Estate established a Replanting Programme for Year 2020-2026 updated 16/02/2023. In 2023 a replanting programme allocated for 227.07 Ha for Divisions below: a. Sapi (Block 22), Sapi (Block 24), Kwan (Block 30), Kwan (Block 38B), Kwan (Block 42), Kwan (Block 43), Kwan (Block 44), Bangkawat (Block 103A).	Complied
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	Management Review was conducted on 07/07/2023 for Genting Plantations Operating Unit (Sabapalm POM and Estate) as Minutes of Internal Audit Management Review Meeting which attended by Abdul Rahim Wilson (VP Plantation-R2), Tan Yeong Huat (Sr. Estate Manager), Elbert Tay Kuang Te (Mill Manager), Assistant Managers, Clerks, Ronlie Ronney (Sustainability Executive) and Pawatang Pamalu (Sustainability Manager). Agenda discussed included: a. Status outstanding issues from previous meeting. b. Change, improvement or modification of Sustainability Management System. c. Inter and external audit findings. d. Complaints, grievances and enquiry. e. Stakeholder Meeting Report. f. Greenhouse value g. Continual improvement status and 10 others agendas.	Complied
<b>Criterion 3.2:</b> The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.			

<p>3.2.1</p>	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm Oil Mill have established Continuous Improvement Plan dated 28/05/2023. The improvement plans have been implemented and some were in progress. The implementation were verified as below.</p> <p><u>Genting Sabapalm Oil Mill</u></p> <ol style="list-style-type: none"> <li>1. To improve on environmental aspects and impacts, regular monitoring of water quality was done at the mill. Verified that water quality analysis was done on a quarterly basis.</li> <li>2. To receive and act on any environmental complaints through internal and external communication. Stakeholder meeting was conducted on 27/05/2023. Environmental issues that were raised have been effectively addressed and responded to the complainants.</li> <li>3. Continue to create awareness on recycling program through campaigns and posters. Recycling Program has been conducted by the mill on 18/05/2023.</li> <li>4. Continue to make full use of the biomass wastages. EFB and Decanter Cake was distributed to Genting Sabapalm Estate for use as mulch. POME was channelled to the estate via land application.</li> <li>5. In order to reduce usage of fossil fuel, the mill has purchased biodiesel for mill utilisation.</li> </ol> <p><u>Genting Sabapalm Estate</u></p> <ol style="list-style-type: none"> <li>1. Regular Meetings with Stakeholders were conducted to further enhance communication and feedbacks.</li> <li>2. Repairs on workers housing were carried out as and when required.</li> </ol>	<p>Complied</p>
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		<ol style="list-style-type: none"> <li>3. Estate continues to use less hazardous chemicals as alternative to toxic and banned chemicals.</li> <li>4. Pesticide Usage is regularly monitored to calculate the effects to the environment.</li> <li>5. Cover Cop has been established at the replanting areas to control soil erosion.</li> <li>6. Grass Cutting for immature areas and cattle grazing and rotor slasher has been introduced as an alternative to chemical applications as weed controls.</li> <li>7. Beneficial Plants has been established along the main roads of the estates.</li> <li>8. Water Quality Monitoring has been done regularly in compliance to the SOP.</li> <li>9. Buffer zone has been well established along the river banks. Signages prohibiting activities such as chemical and fertiliser application and fishing were erected.</li> <li>10. Recycling Awareness were conducted for the workers to dispose waste materials responsibly.</li> </ol>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b></p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>RSPO metric template version 2.1 is used for the reporting of Genting Oil Mills (Sabah) Sdn Bhd – Genting Sabapalm Certification Unit’s metrics (economic, social and environment). Data reporting period is January to December 2022 for (social and environment metrics) and economic metrics from June 2022 – May 2023 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p>	Complied

Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm Oil Mill and the estate are guided by a number of SOPs that have been established for standardization as well as to ensure implementations and operations are in accordance with the legal requirements and best practises.</p> <p>Sighted Sustainability Management Procedure Manual (SMPM) were available for verification. Genting Sabapalm Oil Mill. A total of 33 documents in SMPM Contents such as:</p> <ul style="list-style-type: none"> <li>a. Control of Documents (SMP-GPB-01) Rev.00 dated 01/08/2013.</li> <li>b. Traceability (SMP-GPB-09) Rev.06 dated 11/10/2021.</li> <li>c. Complaint and Grievances (SMP-GP-19) Rev.04 dated 16/03/2020.</li> <li>d. Supply Chain and Traceability (SMP-GPB-23), Rev.13 dated 13/12/2021.</li> <li>e. Pollution Management (SPM-GPB-31) Rev.01 dated 02/08/2016.</li> </ul> <p>Sighted a Memorandum from Vice President-Risk Management &amp; Compliance, dated 29/03/2023 on Sustainability Management Procedural Manual. Updates of SMP:</p> <ul style="list-style-type: none"> <li>a. Traceability (Estate), Rev.07 (SMP-GPB-09)</li> <li>b. Water Sampling and Analysis, Rev.02 (SMP-GPB-15)</li> <li>c. Procedure on Prevention and Eradication of Sexual Harassment at Workplace (SMP-GPB-20)</li> <li>d. Legal Requirements Register, Rev.11 (SMP-GPB-22)</li> </ul>	Complied



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		<p>Also established and documented Standard Operating Manual listing 20 documents in Table of Contents. Among them included:</p> <ul style="list-style-type: none"> <li>a. Reception (SOM-MGR-01) Rev.00, dated 01/05/12</li> <li>b. Sterilizer (SOM-PRD-04) Rev.01, dated 25/09/2015</li> <li>c. Press (SOM-PRD-06) Rev.00, dated 01/05/2012</li> <li>d. Boiler (SOM-PRD-13) Rev.00, dated 01/05/2012</li> <li>e. Effluent (SOM-LAB-15) Rev.00, dated 01/05/2012.</li> </ul> <p>In Genting Sabapalm Estate, Standard Operating Procedure (SOP) Rev.03, dated 11/10/2013 covering:</p> <ul style="list-style-type: none"> <li>a. Steps in managing and handling chemicals, lubricant and fertilizer</li> <li>b. Steps in managing and handling fuel. (page 22-25 to be enhance further by explaining method to handle and contain spillage)</li> <li>c. Steps in spraying and using spraying pump.</li> <li>d. Spaying with mechanical method.</li> <li>e. Woodiest Spraying.</li> </ul>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.          - Minor Compliance -</p>	<p>Internal Audit Department has conducted internal audit as reported in Form IA(GF)/C01 for period Jan-Mar 2023, led by Corrine Lau (Sr. Manager-AID). The objective of the internal audit is to ensure that all procedures are effectively implemented.</p> <p>Nevertheless, there were lapses found in the implementation of procedures. Evidences as below.</p> <p>The spillage of diesel located at Genting Sabapalm POM was not properly handled, contained from entering drain and adjacent effluent pond as SDS dated 04/10/2019.</p>	<p>Non-compliance</p>

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		<ol style="list-style-type: none"> <li>1. Found spillage of diesel mark on soils at skid tank storage located in Genting Sabapalm POM and later covered with soils.</li> <li>2. SDS sampled for Diesel. Petronas Diesel Euro 5 (B7) Released 04/10/2019. Section 16: Accidental release measures stated Prevent product from entering drain as environmental precautions. Contain spillage and then collect with non-combustible absorbent materials (eg. Earth, sand, diatomaceous earth, vermiculite).</li> <li>3. Standard Operating Procedure (SOP) Rev.03, dated 11/10/2013 under Steps in managing and handling fuel could be further improved explaining method to handle and contain spillage.</li> </ol>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.            - Minor Compliance -</p>	<p>The continuous monitoring of the SOP implementation was implemented through all levels of the supervisory personnel with records maintained and verified. No changes in records maintained as per previous assessment. Among others the records are:</p> <ol style="list-style-type: none"> <li>a. Daily production/work records for the core activities</li> <li>b. Field Costing Books</li> <li>c. Monthly Chemical Consumption Record</li> <li>d. Mature/immature field work program</li> <li>e. Fertilizer application Records</li> <li>f. Herbicide Work Program</li> <li>g. Rat Baiting Census Records</li> <li>h. Harvesting Standard Checklist</li> <li>i. Worksite Inspection Form</li> </ol>	Complied
<p><b>Criterion 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			

<p>3.4.1</p>	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting either new operation in Genting Sabapalm complex and Social and Environment Impact Assessment conducted on June 2020 and latest revision on March 2021 by sustainability department documented in the document "Social and Environment Impact Assessment (SEIA) &amp; Human Rights Impact Assessment (HRIM) report. Additional assessment made on 07/07/2023 to include new constructions of new workers housing in Sapi Division. The objective of the assessment is for information and data collection related to social and environment and workers` livelihood issues in Genting Sabapalm Estate and POM and to propose management actions and provide recommendation for identified issues and to manage the social impacts that has been occurred. The assessment has been done base on different methodology in order to ensure accurate data and information collection which are data collection from in depth interview with various categories of stakeholders, filed observation and focus group discussion. Other than that, data analysis has been done through the records and document that has been established by the management. There is no negative issues has been identified during the assessment and has been further confirmed through the interview workers, smallholders and stakeholders.</p>	<p>Complied</p>
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Social and Environment Management Plan has been established for the issues that has been highlighted in the document "Social and Environmental Impact Analysis and Action Plan" and there is that the management plan has been established with consultation of affected stakeholders. Sample of management plan as follows</p> <p>a. The management will allow neighbouring estate, smallholders, and local communities access for roads for FFB transport.</p>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>b. The management will continue to provide free medical treatment to all workers by appointed and certified hospital assistant.</li> <li>c. The management will ensure to advertise any job vacancy to local communities.</li> <li>d. The management will ensure to conserve all buffer zones and avoid any agrochemical applications at the area.</li> <li>e. The management will ensure all waste are identified, segregated and disposed in accordance to national best practices.</li> </ul>	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Implementation of the social management plan has been verified by the auditor as follow.</p> <ul style="list-style-type: none"> <li>a. The management allows neighbouring estate, smallholders, and local communities access to roads for FFB transport- As per interview with smallholders, it has been confirmed that estate roads is accessible for free and smallholders only need to request for gate pass with approval by the management.</li> <li>b. The management continue to provide free medical treatment to all workers by appointed and certified hospital assistant. As per site visit to estate clinic, adequate facilities has been maintained by the management including medical treatments. It has been confirmed with workers, treatment and medical are provided for free.</li> <li>c. Visit to the river buffers confirmed that there are well established buffers with dedicated signage stating the prohibitions of operations especially agrochemicals. Interview with the estate sprayers confirmed that they are prohibited from spraying the buffer zones.</li> </ul>	Complied

**Criterion 3.5:** A system for managing human resources is in place.

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3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>Documented in "Foreign Workers Ethical &amp; Responsible Recruitment Procedures" Document Number: GEN-13 dated 17/05/2023 for recruitment, selection, retirement, promotion and terminations. It has been classified as publicly available and available at the estate and POM.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Verifications has been made for local and foreign workers in term of implementation of procedure. There is evidence that procedure has been properly implemented. Document verified</p> <ul style="list-style-type: none"> <li>a. Job application forms</li> <li>b. Interview records</li> <li>c. Approval records</li> <li>d. Employment contract/ Contract of services.</li> </ul> <p>For Genting Sabapalm POM, 2 samples of newly recruited workers has been taken by auditor. Details as per below</p> <ul style="list-style-type: none"> <li>a. Worker XXX; ID Number: E00343; Joined on 21/03/2023</li> <li>b. Worker XXX; ID number: E00334; Joined on 22/11/2022.</li> </ul> <p>It has been further verified through interview with the workers itself which confirmed that recruitment procedure has been implemented accordingly.</p> <p>There is no termination has been made by the management for both operating units.</p>	Complied
<b>Criterion 3.6:</b> An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm Oil Mill Genting Sabapalm Estate have implemented a Safety &amp; Health Management Plan for the year 2022 and available for verification.</p>	OFI

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		<p>Among the objectives are to provide and maintain a working environment that is safe without risk to health and adequate as regard to welfare at work.</p> <p>a. Hazard Identification, Risk assessments were conducted and identified in the mill for all operations and as legal compliances. Verification were done accordingly.</p> <p>Hazard Identification, Risk Assessment and Risk Control (HIRARC) was established to assess all hazards and risk related to operations in HIRARC Contents updated 01/03/2023. Among the HIRARC verified were ESP Plant, Belt press, Mill Compound and grass cutting, Carpenter, Sterilizer, Excavator Driver, Water Treatment Plant, Workshop and Engine Room, Store, Boiler and Laboratory.</p> <p>The HIRARC to be further improved to ensure all developed HIRARC to be consistent with the new formats, as per HIRARC New Risk Management Regulations. Hence an OFI was issued.</p> <p>b. Noise Risk Assessment (NRA) was conducted by Sheman Services and Supply on 15-16/04/2021. As a result, 15 out of 20 selected representatives recorded exposure to excessive level (82 dBA) such as Boiler, Capstan, Grass Cutter, Engine Room, Kernel Plant, Loading Ramp, Lab, Oil Room and Press Machine. The mill have provided Personal Hearing Protections (PHP) and Annual Trainings to all workers involved as per NRA recommendations. Safety Signages enforcing the use of PHP were available at all stations.</p> <p>c. Audio metric Test was conducted by DAB OH Sdn. Bhd on 17/04/2023 for 43 workers. 41 having normal hearing and 2 with abnormal hearing which were non occupational related.</p> <p>d. Chemical Health Risk Assessment (CHRA) was conducted by Rehpro Scientific Sdn. Bhd on 23/11/2020.</p>	
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		<p>As sighted in Genting Sabapalm Estate, HIRAC was reviewed on 30/03/2023 covering 31 activities and EFB, Workshop, Office, Genset, Clinic, Manuring, harvesting and spraying. Total 31 activities listed.</p> <ol style="list-style-type: none"> <li>a. Initial Noise Risk Assessment was conducted on 2021 by Dr. Mohd Azizan Abdul Aziz (HQ/18/PEB/00/00024).</li> <li>b. Audiometric test was conducted on 13/03/2023 by DAB OH Sdn. Bhd. Total participant 54 workers where 46 of them having normal hearings. 7 workers with abnormal audiogram and need to be examined by OHD. One worker with Threshold shift (repeat within 3 months).</li> <li>c. CHRA was conducted by QMSPRO Sdn. Bhd. on 09-04/19-31/10/19 by Zairul Akmar Mosmin (HQ/07/ASS/00/236).</li> </ol>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.          - Critical (Major) compliance -</p>	<p>Genting Sabapalm Oil Mill Genting Sabapalm Estate have implemented a Safety &amp; Health Management Plan for the year 2022 and and monitored via inspections to address the identified health and safety risks. The emphasis is on safe work by providing,</p> <ul style="list-style-type: none"> <li>• To provide and maintain a working environment that is safe without risk to health and adequate as regard to welfare at work.</li> <li>• To provide information, instruction, training and supervision to enable workers to perform their work in a safe manner.</li> <li>• To emphasize on accident prevention through opened communication, feedbacks and inputs from employer and employee representatives.</li> <li>• To encourage commitment of all employees in eliminating risks</li> <li>• Continuous improvement of OSH management.</li> </ul>	Complied

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		<p>Besides formal classroom training, other means include on-the-job training and worksite demonstrations to effectively convey safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.</p> <p>The safety performance of each Operating Unit is monitored via:</p> <ul style="list-style-type: none"> <li>▪ Internal Audit conducted by the Sustainability Department;</li> <li>▪ Work Site Inspection (WSI) by site OSH Committee;</li> <li>▪ Direct involvement of supervisor and rounds by Asst Manager;</li> <li>▪ Safety occurrence reporting;</li> <li>▪ Health / medical surveillance;</li> <li>▪ Chemical exposure monitoring, and</li> <li>▪ Audiometric Monitoring</li> <li>▪ Daily Monitoring Checklist such as PPE Checklist</li> </ul> <p>The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken.</p>	
<p><b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm POM has established a Training Schedule for 2023 (Jan-December). Topics covers including mill operations, sustainability, OSH, SOPs, Supply Chain and Legal.</p> <p>Genting Sabapalm Estate has established Training Programme 2023 (Jan-Dec) with target group of participants.</p> <p>Topic included:</p> <p>a. Fertilizer Collection</p>	<p>Complied</p>



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		<ul style="list-style-type: none"> <li>b. Manuring Training</li> <li>c. Riparian Zone Training</li> <li>d. Spraying (Immature)</li> <li>e. SOP and Harvesting Training</li> <li>f. Sexual Harassment Training</li> <li>g. Recycling, Hunting RTE, RSPO and MSPO requirements</li> <li>h. Scheduled Waste training</li> <li>i. HIRARC, SOP, Rat Bait Application</li> </ul>	
3.7.2	<p>Records of training are maintained.            - Minor Compliance -</p>	<p>Training records were maintained and kept as sampled:</p> <ul style="list-style-type: none"> <li>a. HIRARC New Risk Management Regulations conducted on 27/06/2023 attended by all workers.</li> <li>b. Supply Chain, Traceability and Mass Balance Training conducted on 22/06/2023 and attended by Weighbridge Clerks and Office Clerks.</li> <li>c. Supplier Selection, Monitoring &amp; Evaluation was conducted on 18/05/2023 and attended by Store Workers.</li> <li>d. Scheduled Waste Management was conducted on 18/05/2023 and attended by Store Workers.</li> <li>e. Handling of Tools &amp; Equipment, SOP Oxygen &amp; Acetylene, PTW was conducted on 17/04/2023 and attended by Workshop and Electrical Workers.</li> <li>f. Non-conformity, Corrective and Preventive Actions Training was conducted on 15/04/2023 and attended by Section Heads.</li> <li>g. Role and function of EHS Committee was conducted on 17/03/2023 and attended by EHS Committee members.</li> <li>h. Procedure and Induction of Handling New Workers, contractors and Visitors attended by All Section Head.</li> </ul>	Complied

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		<p>i. QESH &amp; Sustainability Policy Training was conducted on 11/03/2023 and attended by all workers.</p> <p>Training in Genting Sabapalm Estate:</p> <p>j. Fertilizer Collection Sample training was conducted on 06/04/2023 attended by 8 workers.</p> <p>k. Manuring Training was conducted on 16/03/23 attended by 14 manurers.</p> <p>l. Riparian Zone Training was conducted on 14/03/23 attended by 9 Mandore and Manuring.</p> <p>m. Spraying (Immature) Training was conducted on 10/03/2023 attended by 10/03/2023.</p> <p>n. SOP and Harvesting Training was conducted on 23/02/2023 and attended by 30 harvesters.</p> <p>o. Sexual Harassment Training was conducted on 13/04/2023 and attended by all workers.</p> <p>p. Recycling, Hunting RTE, RSPO and MSPO requirements conducted on 15/03/2023 attended by all workers.</p> <p>q. Scheduled Waste training was conducted on 31/03/2023 attended by 6 workers.</p> <p>r. HIRARC, SOP, Rat Bait Application conducted on 03/07/2023 attended by 37 workers.</p>	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>The Supply Chain, Traceability and Mass Balance Training has been conducted at the mill on 22/06/2023 for personals involved in the supply chain process in the mill. Among the attendees the Mill Acting Manager, Office Clerk and Weighbridge Attendant.</p>	Complied
<p><b>Criterion 3.8:</b> Supply chain requirement for mills</p>			

(note: All supply chain requirements are considered as <b>Critical (C)</b> . However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Genting Sabapalm Oil Mill receives certified and non-certified FFB from own supply base and third-party sources. Thus, the mill has opted for the Mass Balance Module. Therefore, this indicator is not applicable to the mill.</p>	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Genting Sabapalm Oil Mill received and processed certified and non-certified FFB. Therefore, the mill opted for the Mass Balance Module.</p> <p>During the assessment, volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO Certified Products was verified.</p>	Complied
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in Table 10 of this public summary report.</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The registration of PalmTrace will be carried out by the Marketing Palm Products Department (MPP), HQ. All transaction will be</p>	Complied

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		<p>registered in the PalmTrace. The mill registered license available in PalmTrace as following:</p> <ul style="list-style-type: none"> <li>- Member ID: RSPO_PO1000004650</li> <li>- Member category: Oil Mill</li> <li>- RSPO Membership No.: 1-0086-06-000-00 (Genting Plantations Berhad)</li> </ul>	
<p>3.8.5</p>	<p><b>Documented procedures</b>  The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ol>	<p>Genting Plantations Berhad have developed Supply Chain and Traceability (Palm Oil Mill) Procedure (Doc. No.: SMP-GPB-23, Rev. June 2022) to ensure that handling of incoming FFB and outgoing CPO &amp; PK are carried out in a proper manger to meet the sustainability requirements for traceability and mass balance. Other supporting documents were developed as below:</p> <ol style="list-style-type: none"> <li>1. Handling, Storage, Preservation and Delivery Procedure (Doc. No.: PM-LAB-03, Rev. 0 dated 02/01/2018)</li> <li>2. Product Identification &amp; Traceability Procedure (Doc. No.: PM-PRD-01, Rev. 0 dated 02/01/2018)</li> <li>3. Control of Nonconforming/ Noncertified Product Procedure (Doc. No.: PM-PRD-05, Rev. 01 dated 12/12/2019)</li> </ol> <p>Completed and up to date records and reports that complied with RSPO SCCS requirements were available and verified. Sampled documents as below.</p> <ul style="list-style-type: none"> <li>- Mass Balance Records.</li> <li>- Training Records (Refer Indicator 3.7.3)</li> <li>- Internal Audit Report for RSPO SCCS.</li> <li>- Records of Incoming FFB and Outgoing CPO and PK.</li> </ul> <p>Appointment letter for person-in-charge of Supply Chain, Traceability and Mass Balance requirements of RSPO, ISCC and MSPO Sustainability Standard dated 01/08/2020 was sighted.</p>	<p>Complied</p>

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		<p>Weighbridge Clerk has been appointed as the person-in-charge by the Mill Acting Manager. Interviewed with the weighbridge clerk confirmed that she is aware and understands the supply chain traceability.</p> <p>Procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP Mill has been detailed out in the Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability. Refer Sustainable Supply Chain and Traceability (Palm Oil Mill) Procedure (Doc. No.: SMP-GPB-23, Rev. June 2022)</p>	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> <li>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b. Effectively implements and maintains the standard requirements within its organisation.</li> </ul> </li> <li>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</li> </ul>	<p>Genting Plantations Berhad have developed Sustainability Internal Audit procedure with Doc. No.: SMP-GPB-03, Rev. 07 dated 13/05/2022 to plan and implement internal audits to determine conformance to the applicable sustainability standards' requirements such as RSPO, MSPO and ISCC. The frequency of the audit is not less than once a year.</p> <p>The latest RSPO SCCS Internal Audit was carried out on 20 - 21/06/2023 Sustainability Department. There were no Major NC for RSPO SCCS raised and recorded in the internal audit report.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> <li>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> </ul>	<p>Purchasing Goods In</p> <ul style="list-style-type: none"> <li>a. The Weighbridge Reception plays the role to verify all incoming FFB into the mill. All incoming FFB provide FFB Chits to the Weighbridge Reception where they verify the documents to include all required information prior to receiving the FFB. Only FFB received from Genting Sabapalm Estate are RSPO Certified</li> </ul>	Complied

	<p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>where else the rest are uncertified. The system used to abstract the weighbridge data separates the FFB into RSPO certified and uncertified. Interview with the weighbridge operator confirmed that she could demonstrate understanding on the process of verifying the documents and documenting the sources and tonnage of the FFB. This process is overseen by the Mill Manager.</p> <p>b. The mill are aware that they are to inform the CB immediately if there are any projected overproduction of certified tonnage. As of to date there were no projected overproduction from the mill.</p> <p>c. The mechanism for handling non-conforming oil palm products and/or documents is addressed under Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability. Refer Sustainable Supply Chain and Traceability (Palm Oil Mill) Procedure (Doc. No.: SMP-GPB-23, Rev. June 2022)</p>	
<p>3.8.8</p>	<p><b>Sales and Goods Out</b>  The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> </ol>	<p>All the information required by the standard was available in various shipping documents such as transporter’s delivery order, mill’s weighbridge, buyer’s receiving notes, to name a few. The following documents were verified:</p> <p><u>Sales of RSPO Certified PK</u>  Contract Number: SGOMS/PK/2304/S03</p> <ol style="list-style-type: none"> <li>1. Buyer: XXX</li> <li>2. Seller: Genting Oil Mills (Sabah) Sdn Bhd</li> <li>3. Delivery Date: 11/05/2023</li> <li>4. Doc Issue Date: 11/05/2023</li> <li>5. RSPO Cert Number: RSPO 653477</li> </ol>	<p>Complied</p>

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	<ul style="list-style-type: none"> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<ul style="list-style-type: none"> <li>6. Product: PK/MB</li> <li>7. Quantity: 31,190 Kg</li> <li>8. Related Doc: Authorization Form &amp; Despatch Security Checklist</li> <li>9. Ticket Number: PKMB230000030W</li> </ul> <p><u>Sales of RSPO Certified CPO</u></p> <p>Contract Number: SGOMS/CPO/2305/S02</p> <ul style="list-style-type: none"> <li>1. Buyer: XXX</li> <li>2. Seller: Genting Oil Mills (Sabah) Sdn Bhd</li> <li>3. Delivery Date: 22/05/2023</li> <li>4. Doc Issue Date: 22/05/2023</li> <li>5. RSPO Cert Number: RSPO 653477</li> <li>6. Product: CPO RSPO MB</li> <li>7. Quantity: 27,360 KG</li> <li>8. Related Doc: Authorization Form, Despatch Security Checklist</li> <li>9. Ticket Number: CPOMB230000071W</li> </ul>	
<p>3.8.9</p>	<p><b>Outsourcing Activities</b></p> <ul style="list-style-type: none"> <li>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</li> <li>ii) The mill shall ensure the following:             <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> </ul> </li> </ul>	<p>Genting Plantations Berhad have developed Supply Chain and Traceability (Palm Oil Mill) Procedure (Doc. No.: SMP-GPB-23, Rev. June 2022). The procedure states under Section 13.0 the procedures related to Outsourced Contractor which complies with the requirements of the indicator.</p> <p>The mill does not outsource any of its milling activities to any third party. The transport of CPO to the buyers is contracted out to third party transporters. It is stated in the contract agreement between Genting Sabapalm Oil Mill and the contractors in Addendum on RSPO, MSPO, ISCCS and OSHA 1994, RSPO Supply Chain</p>	<p>Complied</p>

	<p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>Certification Standard and requirements will be complied by the contractor.</p> <p>a. The mill maintains legal ownership of CPO and PK during the transportation by the contractor to the buyer.</p> <p>b. Sighted the contract agreement with Landasan Kembar Sdn Bhd (Dated: 01/08/2021 – 31/08/2023) available for verification. The contract agreement states under Addendum on RSPO, MSPO, ISCCS and OSHA 1994 that the certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c. The Supply Chain and Traceability (Palm Oil Mill) Procedure has been communicated to the contractors during the signing of the contract agreement.</p> <p>d. The Transporter Contract Agreement states under Addendum on RSPO, MSPO, ISCCS and OSHA 1994 that they commit to provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The mill has recorded the details of the contractors engaged by the mill in the stakeholder list.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The list of contractors is updated from time to time by the mill. The information of any newly appointed contractor is shared with BSI through pre-audit information request prior to the audit. The information is provided to the assessment team.	Complied
3.8.12	Record keeping	<p>Record Keeping</p> <p>a. The mill maintained all records covering the RSPO SCCS requirements. Records such as mass balance, training records,</p>	Complied



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	<ul style="list-style-type: none"> <li>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</li> <li>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</li> <li>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>iv) For Mass Balance Module, the mill:             <ul style="list-style-type: none"> <li>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</li> <li>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</li> <li>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>despatch documents and internal audits were available for verification.</li> <li>b. The document retention period for maintaining traceability records is 10 years as stated in List of Operational Environmental, Social, Safety and Health Record – (32) RSPO SCCS; Form Number: SMP.</li> <li>c. Section (iii) is Not Applicable as Genting Sabapalm Oil Mill uses the MB Module.</li> <li>d. For Mass Balance Module.             <ul style="list-style-type: none"> <li>– Genting Sabapalm Oil Mill has recorded and balanced all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</li> <li>– All volumes of certified CPO and PK that was delivered were deducted from the Mass Balance Record.</li> <li>– The mill only delivered Mass Balance sales from a positive stock.</li> </ul> </li> </ul>	
3.8.13	<p><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The extraction rate for mill is calculated in daily production detail report. Conversion factor of CPO and PK production is depending on the actual OER and KER.</p>	Complied

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3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Conversion factor of CPO and PK production is depending on the actual OER and KER. The OER and KER is calculated on a daily basis and recorded in the monthly production report.	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	NA. The facility opted for mass balance model.	Not Applicable
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>The registration of PalmTrace is carried out by the Marketing Palm Product Department, HQ. All transaction will be registered in the PalmTrace.</p> <p>Based on the announcement summary, all the registrations were found to be in order and announced within the 3 months after despatch. Sampled despatch of CPO and PK as below.</p> <p>a. CSPO - MB; Contract Number: SGOMS/CPO/2305/S02; Despatch Date: 22/05/2023; PalmTrace Announcement Date: 26/05/2023.</p> <p>b. CSPK - MB; Contract Number: SGOMS/PK/2304/S03; Despatch Date: 11/05/2023; PalmTrace Announcement Date: 15/05/2023.</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	RSPO trademark was not used. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. Genting Plantations Berhad have obtained the RSPO Trademark License on 31/03/2011.	Complied

**General corporate communications**

4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Genting Plantations Berhad has made "off-product" claim by highlighted the commitment to comply with RSPO in <a href="https://www.gentingplantations.com/sustainability/">https://www.gentingplantations.com/sustainability/</a> and status of certification of RSPO in Annual Report 2020.	Complied
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.	The company has used the RSPO Trademark logo in the company Annual Report 2020, <a href="https://www.gentingplantations.com/wp-content/uploads/2021/04/GENP_AR20-Final.pdf">https://www.gentingplantations.com/wp-content/uploads/2021/04/GENP_AR20-Final.pdf</a> .	Complied
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Genting Plantations Berhad does not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Genting Plantations Berhad ensure communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No RSPO corporate logo used as evidence during the document audit.	Complied

<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and sales contract to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	The only business to business communication is through the delivery documents. There is no use of trademark logo in the delivery document. Only the communication with RSPO certification number and supply chain model sighted in the dispatch note.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Not applicable as Genting Sabapalm Oil Mill is not a distributor or wholesaler.	Not Applicable
<b>MODULE B – MASS BALANCE SPECIFIC RULES</b>			
<b>Minimum Mass Balance content</b>			

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	95% or above of the oil palm content must be RSPO MB-certified.	Genting Sabapalm Oil Mill produces RSPO MB CPO and RSPO MB PK. 100% of the oil palm content in both products are RSPO MB Certified.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Genting Sabapalm Oil Mill produces RSPO MB CPO and RSPO MB PK. 100% of the oil palm content in both products are RSPO MB Certified. No Non-Certified content within the product.	Complied
<b>Labelling and trademark (MB)</b>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</li> <li>The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</li> <li>In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications &amp; Claims document.</li> </ul>	Genting Sabapalm Oil Mill is producing crude palm product and does not involved in any labelling of end product.	Not Applicable

Messaging (MB)		
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>• [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain.</li> <li>• The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</li> </ul> <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> <li>• Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</li> </ul>	<p>Genting Sabapalm Oil Mill is producing crude palm product and does not involved in any labelling of end product.</p> <p>Not Applicable</p>
Principle 4: Respect community and human rights and deliver benefits		
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.		
4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented in the document "social policy signed by Mr Yong Chee Kong, president and chief operating officer dated 22/06/2015. Communication of the policy sighted as follow</p> <p>Genting Sabapalm POM- 11/03/2023  Genting Sabapalm Estate  a. Sapi &amp; Kwan Division- 15/02/2023</p> <p>Complied</p>

		<p>b. Bengkawat Division- 01/03/2023  c. Klagan Division- 15/02/2023  d. Stakeholder- Internal stakeholder- 29/03/2023, external stakeholder- 11/04/2023</p> <p>As per interview with workers and the sample stakeholders, it has been confirmed that the policy has been communicated to them and all of them can demonstrate their understanding on the policy.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.  - Minor compliance -</p>	<p>Genting Plantations Berhad prohibits any form of harassment in their operation as per policy that has been established which detailed on up in indicator 4.1.1. Interviewed with the workers and stakeholders confirmed that they are aware prohibition for any harassment by the management and action will be taken for any cases of harassment happen. As for the day of audit, there is no harassment cases happen in both Genting Sabapalm POM and estate that been confirmed through interview with both workers and stakeholders</p>	Complied
<p><b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.  - Critical (Major) compliance -</p>	<p>Mechanism for lodge any complaint has been raised in the document number SMP-GPB-19 revision 05 issuance date June 2022 title "Sustainability management Procedure manual", 3.0, complaints and grievances handling procedure. Stated in the procedure that the time timeframe for the action taken depend on the seriousness of the complaint or grievance. It also mentioned that accepted time frame to acknowledge and respond to the complaint (s) is within 1 months period. For complaint channel, stated in that written complaint can be delivered to management through email, post of short messaging systems. Other than that complaint can be extended via careline to VP-HRAD at head office.</p>	Complied

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		<p>Other than that, for female workers, there is specific procedure has been established in the document title Procedure on prevention and eradication of sexual harassment at the workplace document number SMP-GPB-20 dated January 2023. Stated in the procedure, any complaint related to female can be lodge through gender committee, immediate supervisor, head of department or Human resources and administration department (HRAD)</p> <p>Stated in the procedure will be given option of access to independent legal and technical advice, to choose individuals or groups to support them and act as observer as well as the option of third-party mediator.</p>	
<p>4.2.2</p>	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>There is evidence that the grievance procedure has been communicated to all workers, stakeholders base on the training records. For Genting Sabapalm POM, workers has been communicated during the morning muster all dated 03/03/2023 and 15/04/2023 with attendance of all workers. While for female workers, it has been communicated during the gender committee meeting on 03/03/2023 and for stakeholders during the stakeholder's consultation meeting conducted on 27/05/2023</p> <p>While for Genting Sabapalm Estate, communication of the procedure as follows</p> <ol style="list-style-type: none"> <li>1. Stakeholder             <ol style="list-style-type: none"> <li>a. Internal stakeholder - 29/03/2023,</li> <li>b. External stakeholder - 11/04/2023</li> </ol> </li> <li>2. Workers             <ol style="list-style-type: none"> <li>a. Sapi &amp; Kwan Division- 15/02/2023</li> <li>b. Bengkawat Division - 01/03/2023</li> <li>c. Klagan Division - 15/02/2023</li> </ol> </li> </ol>	<p>Complied</p>



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		<p>As per interview with workers and the sample stakeholders, it has been confirmed that the procedure has been communicated to them and all of them can demonstrate their understanding on the procedure. There is no illiterate parties has been identified.</p>	
<p>4.2.3</p>	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>All instances of complaints have been documented in the complaint, grievances, and inquiry record books, referred to as the "Buku Rekod Aduan/Kilanan Pertanyaan." The most recent complaint was received on 05/10/2022 from a worker residing in Kampung Bulan Sabapalm. A response was provided on 08/10/2023. Additionally, a complaint concerning Genting Sabapalm Estate was reported on 03/07/2023, with responses given on 05/07/2023 and 08/07/2023, related to a request for repairing the foundation of a water tank.</p> <p>Mechanism to lodge any complaint has been raised in the document number SMP-GPB-19 revision 05 issuance date June 2022 title "Sustainability management Procedure manual", 3.0, complaints and grievances handling procedure. Stated in the procedure that the time timeframe for the action taken depend on the seriousness of the complaint or grievance. It also mentioned that accepted time frame to acknowledge and respond to the complaint (s) is within 1 month's period.</p> <p>Nevertheless, it was verified that complaint received has not been responded in a timely manner. Evidence as below.</p> <p>During the workers representative meeting for Genting Sabapalm POM conducted on 23/03/2023, the management received complaint from the workers representative on damage of septic tank at one of the sundry shops and the waste flow to the drainage at the POM workers quarters. All sundry shops are under Genting Sabapalm Estate management and request was sent by Genting</p>	<p>Non-compliance</p>

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		<p>Sabapalm POM on 21/03/2023 to Genting Sabapalm Estate to repair the septic tank, prior to the meeting.</p> <p>Further verification done by the auditor during the site visit, found out that the issues have not been resolved and it has been confirmed through interview with the sundry shops' owner and the complainer that they have not been updated on the progress of the complaint.</p> <p>Verification at the estate found out that order has been placed on 01/07/2023 based on purchase order reference number ASPEP15388 with total amount RM 2,808.40. Thus, the timeframe taken by the management to respond to this issue, exceeded the 1-month period, as stated in the SOP.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>The process for submitting complaints is outlined in document number SMP-GPB-19, version 05, which was issued in June 2022 and titled "Sustainability Management Procedure Manual." Section 3.0 of this manual pertains to the procedure for managing complaints and grievances.</p> <p>As described in the procedure, individuals lodging complaints will have the opportunity to access independent legal and technical advice. They can also select individuals or groups to provide support and serve as observers. Additionally, there is an option to engage a third-party mediator if desired.</p>	Complied
<b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>The Corporate Social Responsibility (CSR) initiatives presented are founded upon interactions with stakeholders during stakeholders meetings, or in response to requests from stakeholders via established communication and consultation procedures. A stakeholder consultation pertaining to contributions was organized</p>	Complied

		<p>by Genting Sabapalm POM on 27/05/2023. Notably, a specific request was made by Kampung Tembidong for assistance with EFB. In addition to the above, management has undertaken several actions. For instance, they have provided potable water to Klinik Kesihatan Tagas on 16/05/2023 and extended donations to Genting Sabapalm Estate (GSPE) workers to support their operations. Turning to Genting Sabapalm Estate, they have extended their support by facilitating grass cutting at SK Sabapalm and making contributions in the form of cabinets.</p>													
<p><b>Criterion 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>															
<p>4.4.1</p>	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.                      - Critical (Major) compliance -</p>	<p>There are 3 land titles for Genting Sabapalm complex which 2 has been transferred or leased from Kwang Borneo development company on 22/01/1964 to Sabah Development Company Ltd (Currently known as Genting Plantations Berhad) and the other 1 leased from Sabah state government. Details of the land title as per below</p> <table border="1" data-bbox="1137 928 1926 1225"> <thead> <tr> <th>Land title number</th> <th>Hectarage</th> <th>Lease period</th> </tr> </thead> <tbody> <tr> <td>08510997</td> <td>2118.120</td> <td>10/07/1888-10/07/2887</td> </tr> <tr> <td>08510996</td> <td>1957.46</td> <td>10/07/1888-10/07/2887</td> </tr> <tr> <td>085319231</td> <td>283</td> <td>01/01/1987-31/12/2085</td> </tr> </tbody> </table>	Land title number	Hectarage	Lease period	08510997	2118.120	10/07/1888-10/07/2887	08510996	1957.46	10/07/1888-10/07/2887	085319231	283	01/01/1987-31/12/2085	<p>Complied</p>
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<p>4.4.2</p>	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>There is no evidence of any local community land that requires discussions or with affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.</p>	<p>Not Applicable</p>												

4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	There is no evidence of any local community land that requires discussions or with affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Not Applicable
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	There is no evidence of any local community land that requires discussions or with affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Not Applicable
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	There is no evidence of any local community land that requires discussions or with affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Not Applicable
4.4.3	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There is no evidence of any local community land that requires discussions or with affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Not Applicable
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	There is no evidence of any local community land that requires discussions or with affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Not Applicable

4.4.5	<b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	There is no evidence of any local community land that requires discussions or with affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Not Applicable												
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There is no evidence of any local community land that requires discussions or with affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Not Applicable												
<b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.															
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	<p>There is no new planting at Genting Sabapalm Estate as verified by reviewing the documents and interview with workers and staffs. There are 3 land titles for Genting Sabapalm complex which 2 has been transferred of leased from Kwang Borneo development company on 22/01/1964 to Sabah Development Company Ltd (Currently known as Genting Plantations Berhad) and the other 1 leased from Sabah state government. Details of the land title as per below</p> <table border="1" data-bbox="1137 1018 1935 1318"> <thead> <tr> <th>Land title number</th> <th>Hectarage</th> <th>Lease period</th> </tr> </thead> <tbody> <tr> <td>08510997</td> <td>2118.120</td> <td>10/07/1888-10/07/2887</td> </tr> <tr> <td>08510996</td> <td>1957.46</td> <td>10/07/1888-10/07/2887</td> </tr> <tr> <td>085319231</td> <td>283</td> <td>01/01/1987-31/12/2085</td> </tr> </tbody> </table>	Land title number	Hectarage	Lease period	08510997	2118.120	10/07/1888-10/07/2887	08510996	1957.46	10/07/1888-10/07/2887	085319231	283	01/01/1987-31/12/2085	Complied
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4.5.2	<b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal	There is no new planting for Genting Sabapalm Estate. It has been verified by the auditor through Global Risk Assessment Services	Not Applicable												

	<p>and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>System (GRASS) and interview with local communities and neighbouring estate.</p>	
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>There is no new planting for Genting Sabapalm Estate. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.</p>	Not Applicable
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>There is no new planting for Genting Sabapalm Estate. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.</p>	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>There is no new planting for Genting Sabapalm Estate. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.</p>	Not Applicable
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p>	<p>There is no new planting for Genting Sabapalm Estate. It has been verified by the auditor through Global Risk Assessment Services</p>	Not Applicable

	- Minor compliance -	System (GRASS) and interview with local communities and neighbouring estate.	
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	There is no new planting for Genting Sabapalm Estate. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.	Not Applicable
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no new planting for Genting Sabapalm Estate. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.	Not Applicable
<b>Criterion 4.6:</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.			
4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	The management of Genting Plantations Berhad adopt the same procedure title "Negotiation, compensations and handling procedure document number SMP-GPB-18 issuance date 05/09/2014. Stated in the clause 2.0 land/boundary disputes where has outline the process of handling any issues related land dispute and identification of legal, customary and user rights. Identification of persons entitle to compensation also stated in the same procedure.	Complied
4.6.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	The management of Genting Plantations Berhad adopt the same internal procedure title "Negotiation, compensations and handling procedure document number SMP-GPB-18 issuance date 05/09/2014. The objective of the procedure is to ensure implementation of a fair compensation for any issue/ disputes related land power to claim rights, ownership and access to land between parties involved in considering differences in ethic groups' gender differences. It is also to ensure any negotiation concerning	Complied

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		compensation are dealt with through a documented system that enables indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved. Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute.	
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	There is no scheme smallholder involved in the certification unit.	Not Applicable
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	SOP refer to Indicator 4.6.1. There was no any land dispute reported since last. This has verified through interview with the stakeholders.	Complied
<b>Criterion 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	The management of Genting Plantations Berhad adopt the same internal procedure title "Negotiation, compensations and handling procedure document number SMP-GPB-18 issuance date 05/09/2014. The objective of the procedure is to ensure implementation of a fair compensation for any issue/ disputes related land power to claim rights, ownership and access to land between parties involved in considering differences in ethic groups' gender differences. It is also to ensure any negotiation concerning compensation are dealt with through a documented system that enables indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved. Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute.	Complied



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4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>The management of Genting Plantations Berhad adopt the same internal procedure title "Negotiation, compensations and handling procedure document number SMP-GPB-18 issuance date 05/09/2014. The objective of the procedure is to ensure implementation of a fair compensation for any issue/ disputes related land power to claim rights, ownership and access to land between parties involved in considering differences in ethic groups' gender differences. It is also to ensure any negotiation concerning compensation are dealt with through a documented system that enables indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved. Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>Not applicable since there is no issues of land has been identified.</p>	Not Applicable
<p><b>Criterion 4.8:</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.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>There are no customary right lands at Genting Sabapalm Certification Units. It has been confirmed through interview with local communities and neighbouring estate. Genting Sabapalm has been leased for 99 years from the Sabah state government.</p>	Complied
4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties</p>	<p>There are no customary right lands at Genting Sabapalm Certification Units. It has been confirmed through interview with</p>	Complied

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	involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	local communities and neighbouring estate. Genting Sabapalm has been leased for 99 years from the Sabah state government.	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	There are no customary right lands at Genting Sabapalm Certification Units. It has been confirmed through interview with local communities and neighbouring estate. Genting Sabapalm has been leased for 99 years from the Sabah state government.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	There are no customary right lands at Genting Sabapalm Certification Units. It has been confirmed through interview with local communities and neighbouring estate. Genting Sabapalm has been leased for 99 years from the Sabah state government.	Complied
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	The prices paid for Fresh Fruit Bunches (FFB) in both the current and preceding periods have been displayed at the weighbridge station. Furthermore, the method for calculating FFB pricing has been categorized as information that is open to the public. Through an interview with a supplier of FFB, it has been verified that the details concerning FFB prices are indeed accessible to smallholders.	Complied
5.1.2	<b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Communication of the FFB pricing has been done 15/03/2023 with attendance of only 22 smallholders even memo has been distributed and posted in the WhatsApp's messaging systems. It has been confirmed through interview with smallholders that attended the	Complied

		training that they has been explain on the FFB pricing. There is no request from any smallholders.	
5.1.3	<b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	There is evidence that fair pricing calculated based on price that has been provided by MPOB for both CPO and PK and deduction Sabah discount, MPOB cess and Sabah sales tax. It has been provided to the smallholder during the explanation of the FFB price.	Complied
5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	There is substantial proof indicating that women have been afforded opportunities in the decision-making process among smallholders who supply Fresh Fruit Bunches (FFB) to Genting Sabapalm POM. This has been confirmed through an interview conducted directly with the FFB supplier where female smallholders can decide to send their FFB to which POM.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	There is substantial proof to support the fairness, legality, and transparency of contracts for the selected sample of smallholders. The contract terms explicitly outline that payment for the supplied Fresh Fruit Bunches (FFB) will be processed before the 15th of the following month. This assessment is based on a representative sample of three smallholders.	Complied
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Substantiated evidence indicates that payments have consistently been made prior to the 15th day following the end of the respective month, as affirmed by the smallholders themselves. The verification process conducted validates that the payment amount aligns precisely with the details recorded on the weighbridge tickets.	Complied
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Observed the calibration of the weighbridge equipment with the following details: a. Equipment Number Serial Number: 195080794 Reference Number: B2029140	Complied

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		<p>Calibration Date: 09/06/2023</p> <p>b. Equipment Number Serial Number: 162150256 Reference Number: B2029139 Calibration Date: 09/06/2023</p> <p>These calibration activities have been authorized by the Metrology Calibration Officer at the Sandakan Branch.</p>	
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	<p>According to the interview, Genting Sabapalm has no objections to providing technical assistance to independent smallholders who are interested in obtaining certification. Additionally, the interview revealed that certain smallholders have achieved MSPO certification under the SPOC scheme with MPOB.</p>	Complied
5.1.9	<p><b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>In the event of any grievances, there exists a mechanism in accordance with the Sustainability Management Procedure Manual titled "Complaints and Grievances" (MP-GPB-19), Revision 04, dated March 2020. As of the last audit, Genting Sabapalm Oil Mill (GSOM) has not received any grievances concerning the supply of Fresh Fruit Bunches (FFB) from smallholders..</p>	Complied
<p><b>Criterion 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
5.2.1	<p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>There is substantiated proof of management engaging in consultations with interested smallholders during a stakeholders' meeting held on 11/05/2023. This confirmation is based on direct interviews conducted with the smallholders themselves. At present, the smallholders do not express any inclination towards pursuing RSPO certification.</p>	Complied
5.2.2	<p>The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial</p>	<p>Genting Sabapalm has implemented a support program that involves consultations and recommendations provided to smallholders by agronomists. Additionally, representatives from the</p>	Complied

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	competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	estate conduct field visits as part of an ongoing effort to enhance and refine the processes in place.	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	This indicator is not applicable as every smallholder delivering to Genteng Sabapalm POM is required to possess valid MPOB licenses. A sample of three smallholders was examined, and it was verified that all of them indeed hold current and valid MPOB licenses.	Not Applicable
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Not applicable since there is no scheme smallholders.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	The smallholder support program undergoes an annual review as part of the management review meeting. Additionally, on April 17, 2023, the RSPO P&C Management Meeting was held concurrently for the entire certification unit at the mill. This meeting was presided over by the Senior Estate Management.	Complied
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	The company still adopt the same policy that has been document in the document Social Policy dated 14/09/2020 and People Policy dated 03/08/2009. Besides, Procedures for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021) was developed and implemented where the migrant workers are provided with safe living condition, post-arrival orientation on the employment condition, safety & health, sustainability and law & regulations. No discrimination, no recruitment fee and no contract substitution was implemented in the company. The policy has been made available and has been posted at the company's website and operating unit's notice boards.	Complied

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6.1.2	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>For Genting Sabapalm POM, only local workers have been recruited in year 2022. There is evidence that recruitment has been done base on competencies and qualification of the applicant. It has been reviewed base documentation such as interview records, personal file (certificate, academic qualification, training attended) and also interview with the newly recruited workers itself.</p> <p>Review of pay checks and employment contracts also confirm that all workers irrespective of nationalities, gender and religion are accorded the same employment terms and receive the same wages for the same scope of work.</p> <p>All foreign workers sampled confirmed that they enjoy the same benefits and amenities such as sick leave, annual leave. It also has been confirmed that there is no recruitment fees has been paid by the foreign workers.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Genting Sabapalm certification units able to demonstrate that there is no discrimination in term of recruitment and hiring. Sample has been taken for 3 workers that has been recruited in year 2023. While for training, all workers has been given training base on training needs conducted and nature of workers. Sample has been taken for 2 works station which are sterilizers and ramp attendant. For promotion, it was verified that during the review period, no workers have been promoted at the pertain units.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>There is no pregnancy test has been conducted for all the workers. For female workers that handling chemical, monthly check-up will be done and will be asked if there is any delay of their menstruation. It has been confirmed through interview with the hospital assistant and female workers. Workers has been identified pregnant will be diverted to other jobs which not related to chemical handling. Routine check-up will be done by the hospital assistant.</p>	Complied

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6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Gender committee for Genting Sabapalm POM is in place where committee has been established can be sighted in the organization which Puan SXXXXXXXX MXXXXX has been appointed chairman and Puan LXXX CXXXXXXXX as secretary. As per interview with Puan SXXXXXXXX MXXXXX, the objective of establishment of gender committee is mechanism for communication, channel for grievances, activities to established good relationships between female workers, educational purposes. Meeting has been conducted on 03/03/2023 as part of mechanism to communicate all policy reared to women, sexual harassment and grievance procedure. Latest activities conducted is sports day female and children and colouring competition on 26/11/2022. Female health check-up also has been done by estate hospital assistant and attended by all female workers.</p> <p>While for Genting Sabapalm Estate, gender committee has been established and participated by all female workers. Sighted activities that has been conducted such as socialization on company policy, medical check up and female health education training.</p> <p>As per interview with sample female workers, it has been confirmed that they understand the objective of establishment of gender committee, and they received benefits in term of improvement and educational as a women.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>As per sample of workers that was taken from different category but same work scope, it has been identified that all workers has been paid equally. Verification has been done through interview with the workers and review of pay slips. For daily rate workers, all workers were paid at RM57.69/day and piece rate work was documented in the document "revised rate for piece rated work as per latest minimum wages"</p>	Complied

<b>Criterion 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>There is no collective agreement for both Genting Sabapalm POM and Genting Sabapalm Estate since there is no union has been established or existed in both operating units. Pays and conditions based on Sabah Labour Ordinance, employment contract, and others permit that applicable</p> <p>While piece rate works, it has been documented approved by the management and will be revised on annual basis if there is any requirement. As per interview, the rate has been done base on the motion study conducted and average earning per workers and productivity.</p> <p>Communication of the employment contract has been done to all workers. Revision of employment contract has been done on 13/04/2022 related to sick leave and minimum wages on 29/04/2022. Other than that, it has been communicated during the induction period for the newly recruited workers. As per interview with the workers, they are able to demonstrate their understanding content of the employment contract.</p>	Complied
6.2.2	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Employment contract is available during the audit and has been documented in the document "Perjanian Pekerjaan Sabah OUs". Sample of workers has been taken base on different work categories, gender, races as per below,</p> <p><u>Genting Sabapalm POM</u></p> <p>Sample workers</p> <ol style="list-style-type: none"> <li>1. E003X6</li> <li>2. E0031X</li> </ol>	Complied



		<ol style="list-style-type: none"> <li>3. E00X87</li> <li>4. E003X1</li> <li>5. E003X1</li> <li>6. E003X6</li> <li>7. E002X2</li> <li>8. E002X4</li> <li>9. E002X8</li> <li>10. E002X1</li> </ol> <p><u>Genting Sabapalm Estate</u></p> <ol style="list-style-type: none"> <li>1. E1XXX4</li> <li>2. E1XXX2</li> <li>3. E1XXX1</li> <li>4. 0XXX4</li> <li>5. E1XXX9</li> <li>6. E1XXX1</li> <li>7. E1XX3</li> </ol> <p>Details that has been included in the employment contract is as per stated in Sabah Labour Ordinance Clause 67. This included salary, working hours (normal, overtime), leave (rest day, sick leave, public holiday), maternity leave, dismissal, accommodation provided and medical benefits.</p>	
6.2.3	<b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave,	As per stated in the Sabah Labour Ordinance and employment contract, workers are not allow to workers more than 8 hours a day	Complied

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	<p>reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>and if exceeds 8 hours, overtime with minimum rate of 1.5 need to be paid by the management.</p> <p>There is 3 shift for Genting Sabapalm POM which started from 7am until 3pm for the 1<sup>st</sup> shift, The management also permitted for overtime until 120 hours Sample has been taken for month March`23, Sept`22 and November`22. There is no overtime has exceeded the limit permitted and there is evidence compliance of working hours.</p> <p>While for Genting Sabapalm estate, working hours is from 630am until 230pm with 30minutes break at 1030am.</p> <p>Pay roll document has been monitored through punch cards 22 for Genting Sabapalm POM and will be key in into the system by the account clerk while for Genting Sabapalm it has been monitored through pocket check roll. Sample has been taken for month March`23, Sept`22 and November`</p> <p><i>Permit Permotongan Gaji Pekerja, Seksyen 113(4), Ordinan Buruh (Sabah Bab 67) Serial Number: JTKSBH/PMT/113/2021/0400 Period 27/12/2021 - 26/12/2023 included</i></p> <ol style="list-style-type: none"> <li>Bayaran pemporses dokumen perjalanan</li> <li>Bayaran pemproses dokumen perjalanan (orang tanggungan pekerja)</li> <li>Bayaran kos perubatan (orang tanggungan pekerja)</li> <li>Bayaran kemudah bekalan elektrik</li> </ol> <p>Agreement for salary deduction sighted dated 10/07/2020 where all workers has signed the agreement.</p>	
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		<p>For sick leave, all workers entitled for once verified by medical officer as per below</p> <ul style="list-style-type: none"> <li>a. Below than 2 years – 14 days</li> <li>b. 2-5 years- 18 days</li> <li>c. Above 5 years – 22 days</li> </ul> <p>As per sample workers, there is evidence that workers has been paid for sick leave as long as the workers provided the management with medical certificate from licensed doctor.</p> <p>Public holiday has been set at 15 days/year including 6 mandatory public holiday. All workers will be paid for the public holiday and also paid triple if working.</p>	
6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Both Genting Sabapalm POM Genting Sabapalm POM has conducted line site inspection on weekly basis and sample has been taken for December 2022, January 2023 Water and electric supply has been provided for free to all employees which extracted from nearby pond and genset for electricity. Clinic has been established in POM and estate area with hospital assistant. Humana has been established to provide education to Indonesian kids. There is also primary school, SK Kg Tagas Tagas located inside the estate compound and the management provided transport for kids to travel to secondary school.</p> <p>Houses are equipped with 2 or 3 bedrooms and a bathroom. As per site visit for both Sabapalm Estate and POM sighted that each family has been provided one house while for single workers, one room has been provided.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Genting Sabapalm POM and Genting Sabapalm Estate is located 45 minutes from the Sapi Nangoh town. Other than that, 2 sundry shops has established and the management has taken initiative to provide free transport using barge to sundry shops operator with</p>	Complied

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		<p>conditions that the grocery price will maintained at reasonable price. Other alternative for workers is to purchase at surrounding village which located at 10km perimeter of POM and estate.</p>	
<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a</i></p>	<p>There is no changes compared to last year where Genting Plantations Berhad adopted the same prevailing wage calculation last updated on 27/05/2022 to include all the in-kind benefits provided to the workers in Genting Sabapalm Estate and Genting Sabapalm Oil Mill. In-kind benefit calculated is RM 991.78 and average take home salary is around RM1700. The prevailing wages is more than the Minimum Wage Order 2022.</p>	<p>Complied</p>

	<p><i>Decent Living Wage</i> (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> <li>• The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>There is evidence that permanent, full-time employment is used for all core work in all operating units. It has been verified base on the workers master list, employment contract, site visit and interview with sample workers. Contractor only been appointed for FFB transport for field to POM using bin system.</p>	Complied
<p><b>Criterion 6.3:</b> The unit of Certification 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>			
6.3.1	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad adopted the same policy as per previous audit in the documented in the Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 which state that that the management of Genting Plantations Berhad is committed will respect the rights of our workers to join or form legal trade unions of their own choosing and to bargain collectively in both Bahasa Malaysia and English.</p>	Complied

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		<p>There is evidence that the policy has been explained to all workers on 11/03/2023 for Genting Sabapalm POM and on 09/05/2023 for Genting Sabapalm Estate. As per interview, the workers can demonstrate their understanding on the policy and their right for association.</p> <p>The is no union for both operating units but the management has taken initiatives to established workers representatives as one of the method for communication/consultation between workers and the management and as part of grievance channel.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Minutes meetings between the estate and POM management available during the audit and documented in Bahasa Malaysia. For Genting Sabapalm POM, latest meeting conducted 23/03/2023 While for Genting Sabapalm Estate, on 19/06/2023 Both meetings has been attended by management representative and workers representative that has been freely elected. Details in 6.3.3.</p> <p>Several issues has been discussed and highlighted. Sample taken for issues on septic tank damage at sundry shops and workers transport during flood. There is evidence that the issues has been responded with participation of the workers representative.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>It has been confirmed that there is no interference by the management for both estate and POM which workers representative has been freely elected and sighted in the election document. As per interview with chairman, secretary and sample workers, it has been confirmed that there were no interferences from the management. Management of Genting Sabapalm POM and Genting Sabapalm Estate did not participate in the meeting and in the election process.</p>	Complied
<p><b>Criterion 6.4:</b> Children are not employed or exploited.</p>			

6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Genting Plantations Berhad adopt the same policy for protection of children including prohibition of child labour in the document title Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where the company shall not use any child labour. Children’s right is respected. There was specific clause under 2.6 of the agreement with contractors mentioned the contractor shall ensure no minor (Below 18 years old) are employed</p>	Complied
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The management of each operating units follows requirement as per stated in local regulations which is “Akta Kanak-kanak dan orang muda (pekerjaan) (Pindaan)” 2019 where persons under 16 and below has been classified as children and young workers has been classified between 16-18 years. As per sampled personal file for both operating units, there are evidence that all workers recruited were above 18 years. Age screening verification procedure has been documented in the recruitment procedure title “procedural instruction foreign workers ethical &amp; responsible recruitment procedure document number GEN-12 dated 17/05/2022</p> <p>Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements of 18 years old are met throughout Genting Sabapalm POM and estate.</p> <p>Personnel files contain copies of the workers’ NRIC (for Malaysians) and passports (for non-Malaysians). These documents were used to screen age of the workers when they applied for the job. Visit to the linesite and field also did not reveal any persons under 18 years old are working.</p>	Complied
6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Review from the master list of workers for both estate and POM and interview with the workers, confirmed that there are no young workers has been recruited.</p>	Complied

6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>Communication of the policy has been conducted to all the workers during the morning muster call. For</p> <ul style="list-style-type: none"> <li>- Genting Sabapalm POM: 11/03/2023</li> <li>- Genting Sabapalm estate: 09/05/2023</li> </ul> <p>While for stakeholders, it has been done during the stakeholder's consultation meeting that has been conducted on 11/05/2023 with attendance of FFB supplier and local communities. As per interview with the local communities, stakeholders can demonstrate their understanding on the policy and it has been confirmed that there is no child labour has been recruited for both operating units.</p>	Complied
<p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad adopt the same policy as previous audit and documented in the document sexual Harassment Policy dated 03/08/2009 was developed to ensure harassment-free environment and avoid behavior that may create an atmosphere of hostility and intimidation of any kind at the workplace.</p> <p>Other than that, it has been stated in the Social policy dated 14/09/2023 which clearly stated that physical abuse or discipline the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidations shall be prohibited.</p> <p>Communication of the policy has been conducted to all the workers during the morning muster call. For</p> <ul style="list-style-type: none"> <li>- Genting Sabapalm POM: 11/03/2023</li> <li>- Genting Sabapalm estate: 09/05/2023</li> </ul> <p>As per interview with workers, there is evidence that the policy has been communicated and they can demonstrate their understanding on policy.</p>	Complied



<p>6.5.2</p>	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.          - Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has implemented a Social Policy (Incorporating the Labour and Human Rights requirements) dated 22/6/2015. In the policy statement, it mentioned that reproductive rights are protected</p> <p>Communication of the policy has been conducted to all the workers during the morning muster call. For</p> <ul style="list-style-type: none"> <li>- Genting Sabapalm POM: 11/03/2023</li> <li>- Genting Sabapalm estate: 09/05/2023</li> </ul> <p>As per interview with workers, there is evidence that the policy has been communicated and they can demonstrate their understanding on policy.</p>	<p>Complied</p>
<p>6.5.3</p>	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.          - Minor compliance -</p>	<p>There is no new mother for Genting Sabapalm Pom while Genting Sabapalm, there is 6 new mothers in 2022 and 4 in year 2023. Sample has been taken 2 new mothers and details as per below</p> <ol style="list-style-type: none"> <li>a. XXX, delivery date 18/04/2023</li> <li>b. XXX, delivery date 25/03/2023</li> </ol> <p>Identification of mothers' need has been done and one of the new mother requested for her to go back for breast feeding and milk pumping at the office. Interview with the new mother confirmed that the management allowed the request for breastfeeding and check-up.</p> <p>Consultation with new mothers on medical check-up for pregnant women, risk of pregnancy and delivery and delivery cost has been done on 09/03/2023 by estate hospital assistant, Puan Malini Bolokan.</p> <p>Checklist for new mother assessment can be further improved by identifying relevant questions included in the checklist base on the</p>	<p>OFI</p>

		timing of assessment to obtain more information on new mothers need. Thus an OFI was issued.	
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	Grievance procedure which respect anonymity and protect complainant has been outline in 2 procedure which are "procedure on prevention and eradication of sexual harassment at the workplace" document number SMP-GPB-20 dated 11/10/2013 and "complaint and grievances procedure" document number SMP-GPB-19 dated March 2020. Stated in the procedure that complainants will protected and investigation will be done confidentially. There is no complaint related to harassment and abuse has been received by the management for both Genting Sabapalm POM and estate	Complied
<b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited: <ul style="list-style-type: none"> <li>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>Charging the workers for recruitment fees.</li> <li>Contract substitution</li> <li>Involuntary overtime</li> <li>Lack of freedom of workers to resign</li> <li>Penalty for termination of employment</li> <li>Debt bondage</li> <li>Withholding of wages</li> </ul> - Critical (Major) compliance -	Based on interviews with the workers, and observations made, the following were found: Retention of documents: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Some Indonesian workers has been interviewed and confirmed that passport has been kept by the workers itself. It has been confirmed during site visit to line site where verification passport has been kept at their house. Charging of recruitment fee: Workers are not charged any recruitment fees. Interviews conducted with workers also confirmed that they have not been charged any recruitment fees. Involuntary overtime: Based on interviews conducted with the workers, all overtime work were carried out on a voluntary basis. Workers are free decline any offers for overtime work. Sighted were written consent from workers to work overtime for both Genting Sabapalm POM and Genting Sabapalm Estate.	Complied

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		<p>Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with workers.</p> <p>Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview where there is no debt has been given to the workers. There is also no recruitment fee has been charged to the workers hence confirmed that there is debt bondage implement.</p> <p>Withholding of wages: There is no evidence of withholding of wages. Workers' wages have been paid by cash and sighted evidence of payment that has been signed by the workers. There is evidence that there no workers' wages has been withhold. It has been further confirmed through interview.</p>	
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The company adopt the same policy document in the document title Social Policy dated 14/09/2020 and People Policy dated 03/08/2009. Besides, Procedures for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021) was developed and implemented where the migrant workers are provided with safe living condition, post-arrival orientation on the employment condition, safety &amp; health, sustainability and law &amp; regulations. No discrimination, no recruitment fee and no contract substitution was implemented in the company.</p>	Complied
<p><b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The responsible person for OSH was established such as sighted from ERP Team Organization Chart. Chairman is Elbert Tay Kuang Te (Mill Manager), Habibi Saing (Secretary), 8 Employees Representatives) and 10 (Employees Representatives). Sighted Appointment Letter dated 01/07/2023 issued to Sani Abd Rashid as member of Safety and Health Committee (SHC) by Elbert Tay Kuang</p>	Complied

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		<p>Te (Mill Manager). All roles and responsibilities as SHC were clear defined as included in the letter. Another one dated 01/04/2023 issued to Niska Dupli with similar information of appointment as SHC.</p> <p>Regular meeting (quarterly) of Safety and Health Committee were conducted as Minutes of Meeting conducted on 23/06/23, 07/03/2023, 12/12/2022, 13/09/2022, 22/06/2022. Meeting attended by Chairman, Secretary, Employees Representatives and Employers Representatives. As verified found notice for the said meeting which included agenda to be discussed such as:</p> <ul style="list-style-type: none"> <li>- Workplace Inspection Report and Near Missed Report.</li> <li>- Accident Report.</li> <li>- Status of OSH Objectives and Programs.</li> <li>- First Aid and Fire Extinguisher Checklist Report.</li> <li>- Health Statistic from HA</li> <li>- Hirarc</li> <li>- Outstanding issues from previous meeting</li> </ul> <p>In Genting Sabapalm Estate, the SHC meeting was regularly conducted as sighted and kept Minutes of Meeting of SHC conducted on 24/05/2023, 22/02/2023, 29/11/2022 and 25/08/2022. Each meeting found properly issued notices with agenda to be discussed concerning Safety and health, welfare or workers included accident and work place inspection results.</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid</p>	<p>Genting Sabapalm POM has established a Monthly First Aid Box Checklist as sampled dated 12/06/2023 for Box no 1 (Shift M Isa), 2 (Shift Ruji R), 3 (W/Shop), 4 (Store), 5 (Engine Room) and 6 (Office). Check by Niska D.</p>	Complied

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	<p>equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>One of the First Aider was resigned and left 3 trained First Aiders as certificate of training conducted by DAB OH Sdn. Bhd. for Basic Life Support &amp; 1<sup>st</sup> Aid training conducted on 25/02/2022. (IN accordance to 2015 American Heart Association &amp; Guidelines on 1<sup>st</sup> Aid at Workplace by DOSH 2004)</p> <p>During site visit at Workshop found 1<sup>st</sup> Aid box No. 3 well-maintained with 13 items as listed available and properly kept.</p> <p>In Genting Sabapalm Estate sampled First Aid Box at Workshop, Chemical Store, Mandore Harvester and Mandore Manuring found well-maintained and available and accessible wo workers. A list of items in 1st Aid Box established (16 items) and available in all sampled boxes. From January-July 2023 inspection were conducted by Hospital Assistant on all 32 units of 1<sup>st</sup> Aid Boxes as records kept.</p> <p>Available and documented Emergency Response Plan dated 01/08/2009 that explained type of emergencies, ERT organization, Roles and function of ERT, training and Emergency Contact No.</p> <p>Records of accidents such as Accident Investigations, JKPP 6 and JKPP 8 were available for verification. There were no accidents reported for the year 2022 and 2023 to date for both operating units. All accidents are reviewed periodically in the OSH Safety Meetings which are held quarterly at the operating units as verified.</p>	
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>In Genting Sabapalm POM sighted PPE distribution records. Also sighted PPE Inspection on monthly basis recorded such as:</p> <p>Worker XXX (Lab)-Safety Shoes (13/03/2023), Respirator (07/02/23), Safety Helmet (01/07/2023), Safety Vest (01/07/2023), and Rubber Gloves (01/07/2023).</p> <p>Worker XXX (WTP)- Safety Shoes (01/07/2023) and Safety Vest (01/07/2023).</p>	Complied

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		<p>Worker XXX (ETP)-Safety Helmet (01/07/2023), Safety Shoes (01/07/2023) and Safety Vest (01/07/2023).</p> <p>In Genting Sabapalm Estate sampled on Harvester (Block 24 wearing safety helmets and safety boots) , Sprayers (Block 37 wearing safety boots, safety helmets, apron, nitrile gloves, Cartridge Mask, Safety Glass) and Manurers found PPE provided and used during operation such as safety boots, apron, 3M Particulate Mask, nitrile gloves, safety glass.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p>													
<p>6.7.4</p>	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Genting Sabapalm POM and Estate provided workers with medical care with establishment of clinic for any illness and injury for workers cover spouse and children. Workers provided with medical protection as required under Regulation 44A of Social Security (General) Regulations 1971, Found monthly contribution made through Form 8A as below</p> <table border="1" data-bbox="1137 1050 1921 1249"> <thead> <tr> <th>Month</th> <th>Amount Paid</th> <th>Total Workers</th> </tr> </thead> <tbody> <tr> <td>January 2023</td> <td>RM 2,870.60</td> <td>70</td> </tr> <tr> <td>March 2023</td> <td>RM 3,081.80</td> <td>73</td> </tr> <tr> <td>June 2023</td> <td>RM 3,397.90</td> <td>74</td> </tr> </tbody> </table> <p>Sampled in Genting Sabapalm Estate, sighted records of monthly contribution made as below:</p>	Month	Amount Paid	Total Workers	January 2023	RM 2,870.60	70	March 2023	RM 3,081.80	73	June 2023	RM 3,397.90	74	<p>Complied</p>
Month	Amount Paid	Total Workers													
January 2023	RM 2,870.60	70													
March 2023	RM 3,081.80	73													
June 2023	RM 3,397.90	74													

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		Month	Amount Paid	Total Workers	
		June 2023	RM 4,672.90	215	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Genting Sabapalm POM established and maintained Accident Statistics for Year 2013-2023 (As at May 2023). Only in 2017 and 2019 recorded a one case LTA each which resulted 192 hours LTI (2017) and 144 hours LTI (2019). Both involving workers from Workshop. Mill has sending Form JKPP 8 to JKPP on 07/01/2023 with zero case of accident or occupational disease or occupational poisoning. Zero fatality rate for accident and occupational disease or occupational poisoning.			Complied
<b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b>					
<b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.					
7.1.1	<b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	IPM Plan Management Plan established and documented dated 20/04/2023. Among activities included: <ul style="list-style-type: none"> <li>- Biological trap-Installation of Pheromone trap to reduce pesticide usage</li> <li>- Beneficial Plant-Increase planting area</li> <li>- Grass cutting/rotor slasher-Current resources (4 rotor slasher covering all immature area), (4 backpacker rotor slasher for circle weeding at immature area).</li> <li>- Cow Cattle Grazing-Mature Area (103 heads)</li> </ul> Monitoring was done on the progress and dateline of completion as recorded the status of each activities sighted.  Genting Sabapalm Estate established a Map for Beneficial Plant Planting updated April 2018. IPM Refresher Training (Genting Sabapalm Estate) was conducted on 08/11/2022 and attended by 18 workers as attendance record.			Complied

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7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	Species referenced in the Global Invasive Species Database and CABI.org were not used in Genting Sabapalm Estate.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	As sampled during site visit along the estate particularly at ongoing replanting area, immature and mature area there is no use of fire for pest control in Genting Sabapalm Estate. This was verified via documents and interview with the workers.	Complied
<b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	Justification of pesticides used were those officially registered under the Pesticide Act 1974. Type of pesticides used only under class II, class III & class IV pesticides as verified via the chemical register and the chemicals available in the chemical store. Found no illegal agrochemicals (stated by local and international laws) such as paraquat was used in their estates.  The usage of pesticides were based on the Sustainability Management Procedure (SMP-GPB-28) Titled: Justification Of Pesticides Used; Revised dated 17/03/2015. SOP and in the Pictorial Safety Standard Book where written justifications had been provided for various fields operations.  The chemical register list indicated the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the pesticides.	Complied
7.2.2	<b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - Critical (Major) compliance -	Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per Ha number of applications) had been maintained by the estate in the Pesticide Usage Monitoring Record from year 2017 to 2023 and submitted to the Head Quarters monthly. Verified the records for 2023 as below:	Complied



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Type of Pesticides	Pesticides	LD 50 Oral (mg/kg)	a.i (%)	Kgs	Kgs x a.i
Herbicides	Metsulfuron Methyl	>5000	21.05	220.88	46.50
	Glyphosate	>5000	41.00	3429.60	1406
	Amine (L)	500	60.00	1.60	0.96
	Triclopyr Botoxy Ethyl	2500	32.10	148.00	47.51
	Glufosinate	1.73	13.50	328.40	32.18
	Monex HC (L)	2550	39.50	956.00	377.62
	Indaziflam (L)	2	46.00	-	-
Insecticides	Cypermethrin	2000	16	112.00	17.92
	Thiram	-	80	14.00	11.20
	Antracol	-	35	20.00	7.00
	Envidor	-	22.30	-	-
	Mitac	-	21.60	-	-
	Methamidaphos	-	68.50	-	-
	Carbosulfan (KG)	66-97	3.00	3422.00	1022
Rodenticides	Butik S (KG)	3	0.005	-	-
	ARAKUS	-	0.003	-	-
	Ebor 401 (KG or Box)	10	0.05	5038.50	2.52
Total Pesticides (kg)				13600.98	2052.20
Total Planted Area (Ha)				3956.94	

		<u>Summary of All Pesticides Used</u>				
			2021	2022	2023	
		kg pesticides/planted Ha	2.20	3.81	3.44	
		kg a.i pesticides/planted Ha	0.43	0.80	0.52	
7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The Genting Sabapalm Estate has implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. Sighted during the site visit at the estate, the establishment of beneficial plants along the estate roads and immature areas. Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.</p>				Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>During visit at Chemical Store and Stock Card sampled, no evidence of prophylactic use of pesticides in Genting Sabapalm Estate.</p>				Complied
7.2.5	<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, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ol style="list-style-type: none"> <li>Judgment of the threat and verify why this is a major threat</li> <li>Why there is no other alternative which can be used</li> <li>Which process was applied to verify why there is no other less hazardous alternative</li> <li>What is the process to limit the negative impacts of the application</li> </ol>	<p>Genting Sabapalm Estate does not use chemical that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions or Paraquat in their daily operations. This was established during the verification of the chemical register and interview with SHO and Storekeeper.</p>				Complied

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	<p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>		
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms.</p> <p>Genting Sabapalm Estate has a record of training conducted for sprayer titled Safety Judicious Use of Pesticides/Herbicides Chemicals on 18/03/2023 at Chemicals Store by G Planters.</p> <p>Interview with the sampled sprayers and chemical handlers conformed that they have been adequately trained and understand the contents of the training and procedures in terms of chemical handling. Records of training evaluation were available to conform the statements.</p>	Complied
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>During site visit at Chemical Store located beside the Clinic, found having proper signages, warning signs, Emergency Shower and Eye Bash, First Aid Box, Spill kit, Bunding and containment allocated and maintained. SDS sampled were reviewed within 3 years.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>At Chemical Store sighted pesticide containers were found to be recycled and used as premix containers. The access containers were all triple rinsed and punctured and stored at the designated store before they are disposed to the licensed recycle waste collector.</p>	Complied
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p>	<p>The Genting Sabapalm Estate has prohibited and decided that there is no aerial spraying conducted in the estates or nursery area.</p>	Complied

	- Critical (Major) compliance -		
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm Estate has sent 32 workers to Medical Surveillance at the end of 2022 by Klinik Elopura Sandakan. Sighted the results each workers which indicated all workers are fit to work.</p> <p>The planning to conduct the Annual Medical Surveillance for each chemical handlers could be further enhanced. Hence an OFI was issued.</p>	OFI
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>During site visit and sampling at Block 37, verification with sprayers during site visits in interview session found no persons under the age of 18, pregnant or breastfeeding women work with pesticides. All of them understood on the requirement and able to explain the reason behind it.</p>	Complied
<p><b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Genting Sabapalm Oil Mill has established the Waste Management Plan, dated 18/03/2023. The plan has been categorised into Scheduled Waste, Organic Waste (Domestic), Recyclable Waste and Non-biodegradable Waste. Genting Sabapalm Estate established Waste Management Plan dated 01/03/2023. The identified waste we categorised as Scheduled Waste, Domestic Waste and Recyclable Waste.</p> <p>The plan has detailed out the management plan, monitoring and action plan, person in-charge and status of compliance.</p> <p>The mill and estate have implemented the plans accordingly and the implementation has been verified as below.</p> <p>a. Scheduled Waste has been segregated and stored and disposed to licensed Scheduled Waste Contractors in accordance to Scheduled Waste Regulations 2005.</p>	Complied

		<p>b. The landfill has been maintained in accordance with the SOP where the waste are covered with soil once a week.</p> <p>c. Recycling Awareness Training has been conducted at the estate on 15/03/2023.</p>	
<p>7.3.2</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Generally the interviewed workers have demonstrated good understanding in proper disposal of generated waste in the estate and mill. The visited labour quarters were observed to be in clean condition, free from scheduled waste and recyclable waste.</p> <p>As mentioned above, both operating units have established a Waste Management Plan 2023. The disposal of the waste were identified to be implemented in accordance with the action plans stated in the waste management plan.</p> <p><u>Genting Sabapalm Oil Mill</u></p> <p>a. Domestic Waste collection and disposal was managed by Genting Sabapalm Estate. The estate management arranges the tractors to collect the domestic waste from the mill housing complex do be disposed at the designated landfill at the estate.</p> <p>b. Waste materials classified as Scheduled Waste were disposed via licensed Scheduled Waste Contractor, Lagenda Bumimas Sdn Bhd. Records of Consignment Notes were available for recent disposal and verified as below.</p> <ul style="list-style-type: none"> <li>- SW323 – Spent Chemicals; Date: 26/05/2023; Consignment Note Number: 20230526095VS1C4; Quantity: 0.2196 Mt.</li> <li>- SW410 – Contaminated Cotton Rags; Date: 26/05/2023; Consignment Note Number: 2023052609PXVI2; Quantity: 0.0560 Mt.</li> <li>- SW409 – Empty Chemical Containers; Date: 26/05/2023; Consignment Note Number: 20230526095N5VJD2; Quantity: 0.0330 Mt.</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>- SW410 – Used Filters; Date: 26/05/2023; Consignment Note Number: 20230526093AXUFH; Quantity: 0.0450 Mt.</li> <li>- SW305 – Spent Lubricating Oil; Date: 26/05/2023; Consignment Note Number: 2023052609YPIVHO; Quantity: 0.3450 Mt.</li> </ul> <p><u>Genting Sabapalm Estate</u></p> <ol style="list-style-type: none"> <li>1. The estate established Waste Management Plan dated 01/03/2023. The identified waste we categorised as Scheduled Waste, Domestic Waste and Recyclable Waste.</li> <li>2. Domestic Waste was disposed at the estate landfill located at Block 93 and 7. The estates arranges for the domestic waste to be collected twice a week and disposed at the mentioned landfill. Visit to the landfill at Block 93 indicated that only domestic waste were disposed there. There were no recyclable waste and scheduled waste disposed via landfill. The selected landfill was also far from the housing complex and any water bodies.</li> <li>3. Waste materials classified as Scheduled Waste were disposed via licensed Scheduled Waste Contractor, Lagenda Bumimas Sdn Bhd. Records of Consignment Notes were available for recent disposal and verified as below.             <ul style="list-style-type: none"> <li>- SW410 – Rags and Filters; Date: 21/06/2023; Consignment Note Number: 2023062112B6LWJN; Quantity: 0.0800 Mt.</li> <li>- SW408 – Contaminated Soil; Date: 21/06/2023; Consignment Note Number: 2023062112YAL594; Quantity: 0.0300 Mt.</li> <li>- SW102 – Waste Batteries; Date: 21/06/2023; Consignment Note Number: 20230621125HJGCL; Quantity: 0.0300 Mt.</li> </ul> </li> </ol>	
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		<ul style="list-style-type: none"> <li>- SW305 – Spent Lubricating Oil; Date: 20/06/2023; Consignment Note Number: 2023062110K6RJX3; Quantity: 1.000 Mt.</li> <li>- SW404 – Clinical Waste; Date: 21/06/2023; Consignment Note Number: 2023062110042PZI; Quantity: 0.0020 Mt.</li> </ul>	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	In the replants visited during the audit in the estate, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estates. Waste generated by the estate were disposed in compliance with the organisation’s SOP and legal requirements and in a responsible manner. There were no evidence that open fire were used to dispose waste generated in the estate and mill.	Complied
<b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	<p>Genting Sabapalm Estate practices good agricultural practices as contained in their procedure (Oil Palm Manual, updated April 2021). They are followed to manage the soil fertility to levels ensuring optimal and sustainable as in:</p> <ul style="list-style-type: none"> <li>• OPM 4: Soils and Water Conservation and</li> <li>• OPM 7: Manuring</li> </ul> <p>Both are referred for managing soil fertility, optimizing yield and minimize environmental impact. Included sections on soil conservation practices, Water /Moisture Conservation, Nursery Manuring, Manuring (Immature Palms), Manuring (Mature Palms), Mulching with EFB/Mill by-products, Field Management Control, Productivity, Fertilizer Delivery and Stock Report for Estates, System Control-Order, Arrival, Issue and Stock.</p>	Complied

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7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Plant Test Report (Tissue Sampling) was done for Genting Sabapalm Estate by Genting Plantations Research Centre on 26/04/2022 (Test Report Number: PR15/2022. The report was issued to the estate on 15/06/2022 and was available for verification.</p> <p>The Soil Survey was done for the Genting Sabapalm Estate by Genting Plantations Research Centre (Sabah) on 22/06/2021. The Soil Test Report (Test Report Number: STR 10/2021) was issued on 28/10/2021 and available for verification.</p>	Complied																				
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>a. EFB was received from the Genting Sabapalm Oil Mill and supplied to Genting Sabapalm Estate for mulching purpose at the replanting areas. Records of application were maintained by the estates and were applied in accordance with the SOP at 20 – 40 mt/ha. Sampled the records of application (Mt) for 2023 as below as of June 2023:</p> <table border="1" data-bbox="1182 858 1926 1106"> <thead> <tr> <th>Division</th> <th>Ha</th> <th>Mt</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>Bangkawat</td> <td>104.31</td> <td>1,940.90</td> <td>16 % Complete</td> </tr> <tr> <td>Sapi</td> <td>308.44</td> <td>4,816.49</td> <td>40 % Complete</td> </tr> <tr> <td>Kwan</td> <td>99.84</td> <td>1997.00</td> <td>39 % Complete</td> </tr> <tr> <td>Klagan</td> <td>85.71</td> <td>1,715.13</td> <td>21 % Complete</td> </tr> </tbody> </table> <p>b. POME was treated via effluent pond system and disposed via land application to Genting Sabapalm Estate. Flatbeds were constructed where the POME are channelled in between the palms.</p> <p>a. c. Palm Fronds that were cut during harvesting operations were neatly stacked in between the palms to decay overtime and return the nutrients to the soil. The stacked fronds also plays a role to control erosions during heavy rainfalls.</p>	Division	Ha	Mt	Status	Bangkawat	104.31	1,940.90	16 % Complete	Sapi	308.44	4,816.49	40 % Complete	Kwan	99.84	1997.00	39 % Complete	Klagan	85.71	1,715.13	21 % Complete	Complied
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7.4.4	<p>Records of fertiliser inputs are maintained. - Minor compliance -</p>	<p>Records of fertilisers input is maintained in Genting Plantations Research Centre - 2022 Fertiliser Program for Genting Sabapalm Estate, which have the information about type of fertiliser, quantity (bags and kg), dates of application and field number. Verification of records confirmed that the applied fertilisers were tally with the agronomist recommendation. The application of the fertilizers is recorded in the program upon completion of each field. Records of application for 2023 as of June 2023 were as below.</p> <table border="1" data-bbox="1137 638 1930 1027"> <thead> <tr> <th>Fertiliser</th> <th>Application</th> </tr> </thead> <tbody> <tr> <td>Ammonium Sulphate (AS)</td> <td>42.60 Mt</td> </tr> <tr> <td>Muriate of Potash (MOP)</td> <td>11.45 Mt</td> </tr> <tr> <td>Rock Phosphate (ERP)</td> <td>428.40 Mt</td> </tr> <tr> <td>Kieserite</td> <td>223.15 Mt</td> </tr> <tr> <td>Borate 48%</td> <td>21.68 Mt</td> </tr> <tr> <td>Compound 55</td> <td>5.80 Mt</td> </tr> <tr> <td>NK Mixture A &amp; B (AS)</td> <td>1,232.30 Mt</td> </tr> </tbody> </table>	Fertiliser	Application	Ammonium Sulphate (AS)	42.60 Mt	Muriate of Potash (MOP)	11.45 Mt	Rock Phosphate (ERP)	428.40 Mt	Kieserite	223.15 Mt	Borate 48%	21.68 Mt	Compound 55	5.80 Mt	NK Mixture A & B (AS)	1,232.30 Mt	Complied
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<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.																			
7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -</p>	<p>Map of Genting Sabapalm Estate, Soil Map was available for verification in the estate. The map was prepared by Genting Plantations Research Centre Sabah (GPRCS) and updated on 22/11/2022. The soil map states that the estate consists of 1334.30 Ha of Peat Soil and the rest being Mineral Soil. Among the soil classes identified are Lokan Series, Lungmanis Series, Kinabatangan Series, Sapi Series, Dalit Series, Tuaran Series, Weston Series, Klias Series and Brantian Series.</p>	Complied																

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7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>As per Slope map (analysis based on SRTM90) dated 10/10/2018 by GPRCS (Genting Plantation Research Centre Sabah) showed: -</p> <table border="1" data-bbox="1137 443 1928 794"> <thead> <tr> <th>Terrain Classes</th> <th>Area (Ha)</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Flat (0° - 2°)</td> <td>3504.01</td> <td>80.43%</td> </tr> <tr> <td>Undulating (2° - 6°)</td> <td>780.22</td> <td>12.91%</td> </tr> <tr> <td>Rolling (6° - 12°)</td> <td>72.59</td> <td>1.67%</td> </tr> <tr> <td>Hilly (12° - 20°)</td> <td>0.00</td> <td>-</td> </tr> <tr> <td>Steep (20° - 25°)</td> <td>0.00</td> <td>-</td> </tr> <tr> <td>Very Steep (&gt;25°)</td> <td>0.00</td> <td>-</td> </tr> </tbody> </table> <p>The Slope Map indicated that there were no steep slopes in Genting Sabapalm Estate therefore the estate does not require approval from the state government for replanting.</p>	Terrain Classes	Area (Ha)	Percentage	Flat (0° - 2°)	3504.01	80.43%	Undulating (2° - 6°)	780.22	12.91%	Rolling (6° - 12°)	72.59	1.67%	Hilly (12° - 20°)	0.00	-	Steep (20° - 25°)	0.00	-	Very Steep (>25°)	0.00	-	Complied
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7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>No new planting of oil palm in Sabapalm estate. As per record, the highest terrain only 12 degree as per Slope map (analysis based on SRTM90) dated 10 Oct 2018 by GPRCS (Genting Plantation Research Centre Sabah). Detail can be referred indicator 7.5.2.</p>	Complied																					
<p><b>Criterion 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>																								
7.6.1	<p><b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>The Soil Map (Updated: 22/11/2022) and Slope Map (Dated 10/10/2018) by GPRCS (Genting Plantation Research Centre Sabah) were used and taken into account while planning operations in the estate.</p> <p>Soil surveys and Foliar samplings were done on regularly and available for Genting Sabapalm Estate. The plans and operations</p>	Complied																					

		followed as per recommendation by the GPRCS to sustain suitability of land for palm oil cultivation.	
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Peat Soil consist of 30.62 % of the estate land. The management have done extensive planting on the soil in the estate. Nevertheless, the management of the areas are in accordance with the Best Management Practises (BMP) for cultivation of Oil Palm on marginal Soils, by Genting Plantations Research Centre, Sabah.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil Surveys and Topographic information were available and used as a guidance for planning operational works such as manuring, drainage and irrigation and roads among others.  Peat Drainability Report dated 23/03/2021 were prepared by Genting Plantations Research Centre, Sabah for planning drainage and irrigation at areas with peat.	Complied
<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There was no new planting on peat within the Genting Sabapalm Estate.	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. <b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	Areas of Peat was available in the Map of Genting Sabapalm Estate, Soil Map, available for verification in the estate. The map was prepared by Genting Plantations Research Centre Sabah (GPRCS) and updated on 22/11/2022. The soil map states that the estate consists of 2822.00 ha of Mineral Soil (64.85 %), 1334.30 Ha of Peat Soil (30.62 %) and 204.74 Ha of Acid Sulphate Soil (4.70 %).  Genting Plantation Berhad have submitted the Peat Inventory for the organisation to RSPO on 15/11/2019 and RSPO have acknowledged received on 27/11/2019. The records of communication were available for verification.	Complied

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7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.          - Critical (Major) compliance -</p>	<p>The subsidence soil monitoring was done annually in Genting Sabapalm Estate. Visit to the Soil Subsidence Pole on 12/07/2023 at Klagan Division indicated no movement from the previous record for subsidence soil.</p> <p>Piezometer was available in the estate as well to monitor the water level of the peat areas. Monitoring was done on a weekly basis and records were available for verification. During the visit to the Piezometer at Klagan Division, the reading was recorded at 55cm which is within the required range.</p>	Complied
7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.          - Critical (Major) compliance -</p>	<p>The management of the Peat areas are in accordance with the Best Management Practises (BMP) for cultivation of Oil Palm on marginal Soils, by Genting Plantations Research Centre, Sabah.</p> <p>Peat Drainability Report dated 23/03/2021 were prepared by Genting Plantations Research Centre, Sabah for planning drainage and irrigation at areas with peat.</p> <p>Piezometer was available in the estate as well to monitor the water level of the peat areas. Monitoring was done on a weekly basis and records were available for verification. During the visit to the Piezometer at Klagan Division, the reading was recorded at 55cm which is within the required range.</p>	Complied
7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p>	<p>The management of the Peat areas are in accordance with the Best Management Practises (BMP) for cultivation of Oil Palm on Marginal Soils, by Genting Plantations Research Centre, Sabah.</p> <p>Peat Drainability Report dated 23/03/2021 were prepared by Genting Plantations Research Centre, Sabah for planning drainage and irrigation at areas with peat. There is evidence that the report prepared is according to RSPO Drainability Assessment Procedure Version 02 dated October 2021 and all requirement in the checklist has been included.</p>	Complied

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	<p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>Total 1,334.30 Ha out of 3,947.20 Ha is peat area that has been planted with oil palm which is around 30.62% of total land area. There is no replanting has been done at peat area. As per assessment done, it has been confirmed that peat drainability is in place where there is no significant incidence of backflow of water observed. The management has established plan to re construct suitable carrier drains and additional monitoring. The minimum natural drainability threshold has been met.</p>	
7.7.6	<p><b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>The existing planting on peat area are managed according to the RSPO manual on Best Management Practices such as water table management and piezometer motoring.</p> <p>The management of the Peat areas are in accordance with the Best Management Practises (BMP) for cultivation of Oil Palm on marginal Soils, by Genting Plantations Research Centre, Sabah.</p> <p>Peat Drainability Report dated 23/03/2021 were prepared by Genting Plantations Research Centre, Sabah for planning drainage and irrigation at areas with peat.</p>	Complied
7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>Not applicable because no unplanted and set-aside peatlands in the managed area.</p>	Complied
<b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid</p>	<p>A Water Management Plan for Raw Water &amp; Drinking Water has been established at the mill dated 27/04/2023. The management</p>	Complied

	<p>negative impacts on other users in the catchment. The plan addresses the following:</p> <ul style="list-style-type: none"> <li>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</li> <li>b) Workers have adequate access to clean water.</li> </ul> <p>- Minor compliance -</p>	<p>plan details out the management of water for mill operation and domestic usage.</p> <p><u>Genting Sabapalm Oil Mill</u></p> <ol style="list-style-type: none"> <li>Adequate Clean Water is provided to the workers and staff via own treated water at the Water Treatment Plant at the mill. The water are tested against the NDWQS Standards on a quarterly basis. Genting Sabapalm Oil Mill has appointed Dynakey Laboratories Sdn Bhd to conduct Drinking Water Analysis on a quarterly basis. The analysis report was available for verification as below. <table border="1" data-bbox="1184 708 1933 971"> <tr> <td>Date</td> <td>02/05/2023</td> <td>13/01/2023</td> <td>27/02/2023</td> </tr> <tr> <td>Lab Ref No</td> <td>W230503/04</td> <td>W230116/16</td> <td>W221028/01</td> </tr> <tr> <td>Sample Marking</td> <td>Drinking Water</td> <td>Drinking Water</td> <td>Drinking Water</td> </tr> <tr> <td>Results</td> <td>Not Complied</td> <td>Not Complied</td> <td>Complied</td> </tr> </table> </li> </ol> <p>The internal audit for RSPO conducted on 21/06/2023 by Sustainability Department has identified this issue and raised a non-conformity to the management. The corrective action plans were in progress during the assessment.</p> <p>It was verified that during the period of off spec results, the management have conducted awareness training for the workers to ensure they boil the water prior to consumption. Records of awareness trainings were available in the daily master briefing book.</p> <ol style="list-style-type: none"> <li>The mill monitors its water use per tonne FFB processed which data obtained from flowmeters i.e. at mill process, boiler</li> </ol>	Date	02/05/2023	13/01/2023	27/02/2023	Lab Ref No	W230503/04	W230116/16	W221028/01	Sample Marking	Drinking Water	Drinking Water	Drinking Water	Results	Not Complied	Not Complied	Complied	
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		<p>operation and domestic usage. Records of usage is detailed in 7.8.4.</p> <p><u>Genting Sabapalm Estate</u></p> <ol style="list-style-type: none"> <li>1. The estate has established Water Management Plan dated 24/04/2023 available for verification. The water management plan consist of management of Pear Area, Flood Area, River Water Quality, Water Pollution, Drainage System, Education and Training.</li> <li>2. The estate has 4 sub divisions, namely Sapi Division, Kwan Division, Bangkawat Division and Klagan Division. There are 2 housing complexes in the estate. Workers from Sapi Division and Kwan Division stay in the Sapi Division Housing Complex. While workers from Bangkawat Division and Klagan Division stay in the Bangkawat Division Housing Complex. Water for domestic use and consumption for Sapi Division Housing Complex is provided from the mill's water treatment plant while water from Bangkawat Housing Complex is provided from the Bangkawat Water Treatment Plant.</li> <li>3. Adequate access of drinking water is provided to both housing complex as verified during the interview with the sampled workers. Water are provided 24 hours a day with no restrictions.</li> <li>4. Details of Drinking Water Analysis for Sapi Division Housing Complex has been detailed out as per Mill Drinking Water Analysis above.</li> <li>5. The Drinking Water Analysis for Bangkawat Division Housing Complex are tested against the NDWQS Standards on a quarterly basis. Genting Sabapalm Estate has appointed Dynakey Laboratories Sdn Bhd to conduct Drinking Water</li> </ol>	
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		<p>Analysis on a quarterly basis. The analysis report was available for verification as below.</p> <table border="1" data-bbox="1189 435 1933 699"> <tr> <td>Date</td> <td>21/02/2023</td> <td>25/01/2023</td> <td>26/10/2022</td> </tr> <tr> <td>Lab Ref No</td> <td>W230221/01</td> <td>W230125/03</td> <td>W221026/03</td> </tr> <tr> <td>Sample Marking</td> <td>Drinking Water</td> <td>Drinking Water</td> <td>Drinking Water</td> </tr> <tr> <td>Results</td> <td>Complied</td> <td>Not Complied</td> <td>Complied</td> </tr> </table> <p>The estate management has conducted retest for the drinking water analysis that showed off-spec results. Retest was conducted on 01/03/2023 (Ref Number: W230301/01) and on 12/04/2023 (Ref Number: W320412/06). The 2<sup>nd</sup> results showed compliance towards NSDWQ.</p>	Date	21/02/2023	25/01/2023	26/10/2022	Lab Ref No	W230221/01	W230125/03	W221026/03	Sample Marking	Drinking Water	Drinking Water	Drinking Water	Results	Complied	Not Complied	Complied	
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7.8.2	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm Estate covers an area of approximately 4358.58 ha and divided into 4 divisions, namely Sapi, Bangkawat, Kwan and Klagan Divisions. The estate is surrounded by the Labuk River and its tributaries forming and island. The river water from the Labuk River is used not only for Sabapalm Oil Mill but for the communities surrounding the river. Bangkawat River flows from within the estate, from a ground water source, out of the estate.</p> <p>The protection of rivers and water bodies at the state is guided by the Genting Plantations Berhad; Sustainability Management Procedure Manual – Riparian Buffer Zone Management; Doc Number: SMP-GPB-14; Revision: 02; Issue Date: March 2020.</p> <p>Riparian buffer belts have been established along all these rivers and verified during the site visit. The management have erected signages prohibiting of works such as manuring and spraying, trespassing and encroachments as well as fishing to be done within</p>	Complied																



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		<p>the riparian buffers. The buffers have been clearly demarcated by painting the trees for clear identification. During the visit there were no evidence of chemical or manuring works being done at the riparian reserves. Workers have been provided awareness trainings and documents of trainings were available for verification. Sampled the Riparian Zone Training for Manuring Gang date 14/03/2023.</p> <p>Regular water sampling were done at the rivers to monitor the water quality of the rivers and effects of estate operations on the water bodies. Records of water sampling were available for verification. Genting Sabapalm Estate have identified 3 sampling points at the rivers identified to be conserved. The Water sampling was conducted by Chemsain Konsultant Sdn Bhd with latest sampling done on 03/01/2023. The Test Report (Reference Number: CK/CL405/6516/22). The results indicated that the results complied with Class II of NWQS of Malaysia.</p>	
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>As stated under DOE Compliance Schedule (License Number: 005261; Validity Period: 01/07/2022 – 30/06/2023) mentioned that method for effluent disposal is via land application.</p> <p>Mill effluent is treated via effluent ponds which was visited and found to have complied with the requirements of the DOE Compliance Schedule. Effluent Final Discharge is monitored on a monthly basis in compliance with the DOE Compliance Schedule. Latest Certificate of Analysis conducted on 23/06/2023 by Dynakey Laboratories was verified where the results were within the standard parameters.</p> <p>In regard to the Mill Effluent management, the DOE Compliance Schedule has also required for river water quality monitoring to be done by establishing 2 sampling points, approved by DOE, at the upstream and downstream, to monitor the impacts of effluent discharge to the nearest water bodies.</p>	Non-compliance

		<p>3. There was no evidence that the established sampling points at the downstream and upstream obtained approval from DOE.</p> <p>4. The established downstream sampling point was after the "Environmental Impact Point" and not before as required to monitor the difference in river water quality via water sampling. Thus, a minor non-conformity was raised.</p>																																					
<p>7.8.4</p>	<p>Mill water use per tonne of FFB is monitored and recorded.          - Minor compliance -</p>	<p>The mill continues to monitor its water use per tonne FFB processed which data obtained from flowmeters i.e. at mill process, boiler operation and domestic usage. Based on the records, the mill has consumed:</p> <table border="1" data-bbox="1137 726 1928 1321"> <thead> <tr> <th>Month</th> <th>Water (m<sup>3</sup>)</th> <th>Water/FFB (m<sup>3</sup>/Mt)</th> </tr> </thead> <tbody> <tr> <td>July 2022</td> <td>36,891</td> <td>0.70</td> </tr> <tr> <td>Aug 2022</td> <td>40,678</td> <td>0.68</td> </tr> <tr> <td>Sept 2022</td> <td>41,631</td> <td>0.65</td> </tr> <tr> <td>Oct 2022</td> <td>43,281</td> <td>0.65</td> </tr> <tr> <td>Nov 2022</td> <td>41,212</td> <td>0.67</td> </tr> <tr> <td>Dec 2022</td> <td>40,904</td> <td>0.66</td> </tr> <tr> <td>Jan 2023</td> <td>35,391</td> <td>0.66</td> </tr> <tr> <td>Feb 2023</td> <td>27,248</td> <td>0.61</td> </tr> <tr> <td>Mar 2023</td> <td>33,604</td> <td>0.57</td> </tr> <tr> <td>Apr 2023</td> <td>32,646</td> <td>0.54</td> </tr> <tr> <td>May 2023</td> <td>36,741</td> <td>0.49</td> </tr> </tbody> </table>	Month	Water (m <sup>3</sup> )	Water/FFB (m <sup>3</sup> /Mt)	July 2022	36,891	0.70	Aug 2022	40,678	0.68	Sept 2022	41,631	0.65	Oct 2022	43,281	0.65	Nov 2022	41,212	0.67	Dec 2022	40,904	0.66	Jan 2023	35,391	0.66	Feb 2023	27,248	0.61	Mar 2023	33,604	0.57	Apr 2023	32,646	0.54	May 2023	36,741	0.49	<p>Complied</p>
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<p><b>Criterion 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised</p>																																							

<p>7.9.1</p>	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.          - Minor compliance -</p>	<p>The mill and estates have developed Environment Management Plan 2023 and Management Plan to Improve Efficiency of Diesel Usage dated 01/03/2023 which details out the efficiency usage of fossil fuels in the operating units.</p> <p>The mill continues to use bio-diesel as an alternative for diesel and continue to educate workers on fuel saving practices.</p> <p>Among the action plans implemented by the estates are by doing preventive maintenance of vehicles and machineries and educational programme for the workers on fuel and electricity saving. The fossil fuel consumption are recorded as part of monitoring.</p> <p>The use of Diesel, Electricity and Water were monitored on a monthly basis in the mill and estates and records were as follows.</p> <p>Genting Sabapalm Oil Mill</p> <table border="1" data-bbox="1137 903 1930 1394"> <thead> <tr> <th>Month</th> <th>Diesel (L)</th> <th>Electricity (kWh)</th> </tr> </thead> <tbody> <tr> <td>July 2022</td> <td>5592</td> <td>65,127</td> </tr> <tr> <td>Aug 2022</td> <td>6820</td> <td>72,301</td> </tr> <tr> <td>Sept 2022</td> <td>3934</td> <td>70,375</td> </tr> <tr> <td>Oct 2022</td> <td>5554</td> <td>40,557</td> </tr> <tr> <td>Nov 2022</td> <td>2006</td> <td>60,512</td> </tr> <tr> <td>Dec 2022</td> <td>3112</td> <td>70,231</td> </tr> <tr> <td>Jan 2023</td> <td>3772</td> <td>84,626</td> </tr> <tr> <td>Feb 2023</td> <td>3082</td> <td>71,832</td> </tr> <tr> <td>Mar 2023</td> <td>3080</td> <td>73,614</td> </tr> </tbody> </table>	Month	Diesel (L)	Electricity (kWh)	July 2022	5592	65,127	Aug 2022	6820	72,301	Sept 2022	3934	70,375	Oct 2022	5554	40,557	Nov 2022	2006	60,512	Dec 2022	3112	70,231	Jan 2023	3772	84,626	Feb 2023	3082	71,832	Mar 2023	3080	73,614	<p>Complied</p>
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Apr 2023	2912	74,295
May 2023	2590	73,769
Jun 2023	4186	75,922

Genting Sabapalm Estate

Month	Diesel (L/mt FFB)	Electricity (kWh)	Water (m <sup>3</sup> /mt FFB)
July 2022	1.51	3.51	0.89
Aug 2022	1.24	3.04	0.85
Sept 2022	1.22	2.71	0.91
Oct 2022	1.28	2.19	0.93
Nov 2022	1.11	2.78	0.85
Dec 2022	1.50	3.20	0.48
Jan 2023	1.81	3.86	0.66
Feb 2023	1.37	3.52	0.61
Mar 2023	1.41	3.54	0.57
Apr 2023	1.31	3.48	0.54
May 2023	0.94	3.28	0.49
Jun 2023	1.17	3.55	0.53

**Criterion 7.10:** Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

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7.10.1	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO’s Palm GHG Calculator ver. 4. The data were verified against the mill and estate issuance records and bin cards and were found to be accurate.</p>	Complied						
7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>It has been verified that there are no new development at the estate under Genting Sabapalm Certification Unit. Hence, this indicator is not applicable.</p>	Not Applicable						
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm Oil Mill and estate have established and implemented Pollution Prevention Plan. The sources of pollutants in the estate and mill have been identified and action plans to control and monitor the pollutants were established and available for verification. Implementation of the Pollution Prevention Plans were monitored by the management on a regular basis. Sighted the Implementation as follows.</p> <p><u>Genting Sabapalm Oil Mill</u></p> <p>1. Stack Emission Monitoring was conducted for the Boiler by Multi-Serve Sdn Bhd twice during the DOE Compliance Schedule License Period. (01/07/2022 – 30/06/2023). Emission test results as below.</p> <table border="1" data-bbox="1184 1318 1921 1391"> <thead> <tr> <th data-bbox="1191 1323 1377 1391">Test Parameter</th> <th data-bbox="1384 1323 1756 1391">Monitoring Result</th> <th data-bbox="1762 1323 1915 1391">DOE Standards</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Test Parameter	Monitoring Result	DOE Standards				Complied
Test Parameter	Monitoring Result	DOE Standards							

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				Limit (mg/m <sup>3</sup> )
Description	Boiler No. 3	Boiler No. 3		-
Report Reference	MS/GSOM/2022/BOILER NO.3 (S3) – 2 <sup>nd</sup> HALF	MS/GSOM/2023/BOILER NO.3 (S3) – 1 <sup>st</sup> HALF		
Date Monitored	30/06/2022	17/03/2023		
Particulate Matter (Dust Particulate)	141.7 mg/m <sup>3</sup>	108.5 mg/m <sup>3</sup>		150 mg/m <sup>3</sup>

Based on the monitoring results, it shows that the concentration of dust particulate emitted through Boiler No. 3 does not exceed the standard limit as specified under the Malaysia Air Quality Guidelines, 2014.

- All liquid wastes are treated in POME before being discharged to the estate via land application.
- All waste were managed and disposed in a responsible manner and in compliance with legal requirements. Refer 7.3.2.

Genting Sabapalm Estate

- Genting Sabapalm Estate have established Significant Pollutants and Greenhouse Gas (GHG) Emission – Reduction/Minimisation Plan dated 18/03/2023.
- All waste were managed and disposed in a responsible manner and in compliance with legal requirements. Refer 7.3.2.

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		<p>3. Recycling station was created at the estate housing complex to encourage the workers to dispose recyclable waste at the designated recycling station.</p> <p>4. Training was conducted for tractor drivers on 04/07/2023 to monitor the vehicle conditions a diesel usage.</p>	
<b>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</b>			
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations have established Zero Burning Policy dated 10/08/2011. The policy states that "There shall be no open burning of any kind at operating units, except where deemed necessary with the prior approval of the relevant authorities. This includes domestic waste, agricultural waste, and biomass or by-products generated by the estates and palm oil mills.</p> <p>During the assessment, it was verified that the estates practiced zero burning in replanting operations. In the replant visited during the audit in the estate, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used for replanting land preparation. There were no new planting at all visited estates.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>Genting Plantation Berhad; Standard Operating Procedure; Fire Prevention and Control Measures; Doc Number: SDP-PD-12 Revision: 00; Issue Date: Oct 2020 has been established and available for verification.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>The above-mentioned fire prevention and control measures were communicated to the adjacent stakeholders via providing the procedure to the identified adjacent stakeholders. The stakeholders have acknowledged they have been briefed on the fire prevention and control measures understood the contents of the procedure. The procedural document was available for verification.</p>	Complied

<b>Criterion 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new planting affecting present HCV and primary forest at Genting Sabapalm Estate. There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV. Therefore, this indicator was not applicable.</p>	Not Applicable
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b>            Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>A HCV Assessment was conducted at Genting Sabapalm Estate and available in the Inventory on HCV Within Genting Plantations Berhad Group of Estate (Sabah Region 1). The HCV Assessment was conducted by S.K Yap Forestry and Landscape Advisory Services and available for verification during the assessment.</p> <p>As for Genting Sabapalm Estate, there were 2 areas classified as HCV which is the Riparian Buffer Belt (Labuk River &amp; Bangkawat River) and Burial grounds which has been identified.</p> <p>The management have established a Management and Monitoring Plan for HCV Areas Within Genting Sabapalm Estate which have been reviewed on a yearly basis. The purpose of the Management Plan is to preserve and conserve the HCVs within the estate's management areas.</p> <p>It was verified that there were no new land clearing in all the estates after 15/11/2018.</p>	Complied
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	NA	Not Applicable
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance</p>	<p>Genting Sabapalm Estate have identified HCVs and conservation areas as stated under indicator 7.12.2.</p>	Complied



	<p>HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>To ensure the HCVs and Conservation Areas are protected and conserved, the estates have established a Management and Monitoring Plan for HCV Areas Within Genting Sabapalm Estate dated 01/03/2023. The objective of the HCV Management Plan are as below:</p> <ul style="list-style-type: none"> <li>- To develop maintain and enhance identified HCVs.</li> <li>- To create awareness on the presence, surveillance, utilisation of HCVs among stakeholders.</li> <li>- To create awareness on the appropriate actions to be taken when conflicts occur.</li> </ul> <p>Verified the implementation of the HCV Management Action Plan as below.</p> <ol style="list-style-type: none"> <li>a. Sighted signages being erected at HCV areas stating no hunting, no fishing, no chemical and fertiliser application.</li> <li>b. Regular HCV Monitoring being done by the management, including patrolling with records available for verification. Records available in "Borang Pemantauan/Pemeriksaan Kawasan Nilai Konservasi Tinggi".</li> <li>c. HCV and RTE Awareness Training was conducted at Genting Sabapalm Estate on 28/06/2023.</li> <li>d. Well established riparian reserves were sighted along the water bodies within the estate. There were no evidence of agrochemicals or fertilisers being applied within the conservation areas.</li> <li>e. Regular water sampling were done at rivers and streams to monitor the water quality of the rivers and effects of estate operations on the water bodies. Records of water sampling were available for verification.</li> </ol>	
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		<ul style="list-style-type: none"> <li>- Genting Sabapalm Estate have identified 3 sampling points at the rivers identified to be conserved. The Water sampling was conducted by Chemsain Konsultant Sdn Bhd with latest sampling done on 03/01/2023. The Test Report (Reference Number: CK/CL405/6516/22). The results indicated that the results complied with Class II of NWQS of Malaysia.</li> </ul> <p>The Management and Monitoring Plan for HCV Areas Within Genting Sabapalm Estate is reviewed on a yearly basis with the latest review done in 2023.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>No rights of local communities in HCV areas and HCV Forest identified. There is no land clearing after November 2005. Therefore this indicator is not applicable.</p>	Not Applicable
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The estate have established a Management and Monitoring Plan for HCV Areas Within Genting Sabapalm Estate. The action plan of the management plan states the need to educate and create awareness to the workers on protection of RTE species.</p> <p>The estates continue to train the workers on RTE Species protection. Records of training and awareness briefings were available for verification as stated under indicator 7.12.4. Signages on prohibition of illegal hunting or fishing within the estate were erected at the estate entrance and housing area to educate the workers and visitors.</p> <p>As of to date there were no reports of RTE species being captured, harmed, collected, traded, possessed or killed in the estates.</p>	Complied

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7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The estate have developed a checklist titled "Borang Pemantauan/Pemeriksaan Kawasan Nilai Konservasi Tinggi" where it is being used to monitor concerns such as encroachment, sighting of trespassing, wildlife sightings or conflicts, pollution and erosion issues. The checklist were available for verification at the estate. Monitoring is currently being done on a monthly basis and results from the monitoring is used to develop and revise the Management and Monitoring Plan for HCV Areas Within Genting Sabapalm Estate on a yearly basis.</p>	Complied
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>No land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Genting Sabapalm certification unit. Thus, this indicator is not applicable.</p>	Not Applicable

**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in **July 2021 – June 2022** for **Genting Sabapalm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **July 2021 – June 2022** for **Genting Sabapalm Oil Mill** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	21.26
PKO	21.26

Extraction	%
OER	16.14
KER	3.28

Production	t/yr
FFB Process	112,798.55
CPO Produced	18,210.04
PKO Produced	3,698.53

Land Use	Ha
OP Planted Area	2,612.90
OP Planted on peat	1,334.30
Conservation (forested)	8.95
Conservation (non-forested)	-
<b>Total</b>	<b>3,956.15</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	38985.03	0.44	0.00	0.00	0.00	0.00	38985.03	-
CO <sub>2</sub> Emission from fertilizer	2910.53	0.03	0.00	0.00	0.00	0.00	2910.53	-
NO <sub>2</sub> Emission	12121.53	0.13	0.00	0.00	0.00	0.00	12121.53	-
Fuel Consumption	554.65	0.01	0.00	0.00	0.00	0.00	554.65	-
Peat Oxidation	72852.78	0.82	0.00	0.00	0.00	0.00	72852.78	-
<b>Sink</b>								
Crop Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
Conservation Sequestration	-82.07	0.00	0.00	0.00	0.00	0.00	-82.07	-
<b>Total</b>	<b>127342.45</b>	<b>1.43</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>127342.45</b>	<b>-</b>

*\*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	303222.36	2.69
Fuel Consumption	1362.25	0.01
Grid Electricity Utilization	444.98	0.00
<b>Credit</b>		
Export of Grid Electricity	-444.98	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>304584.60</b>	<b>2.70</b>

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

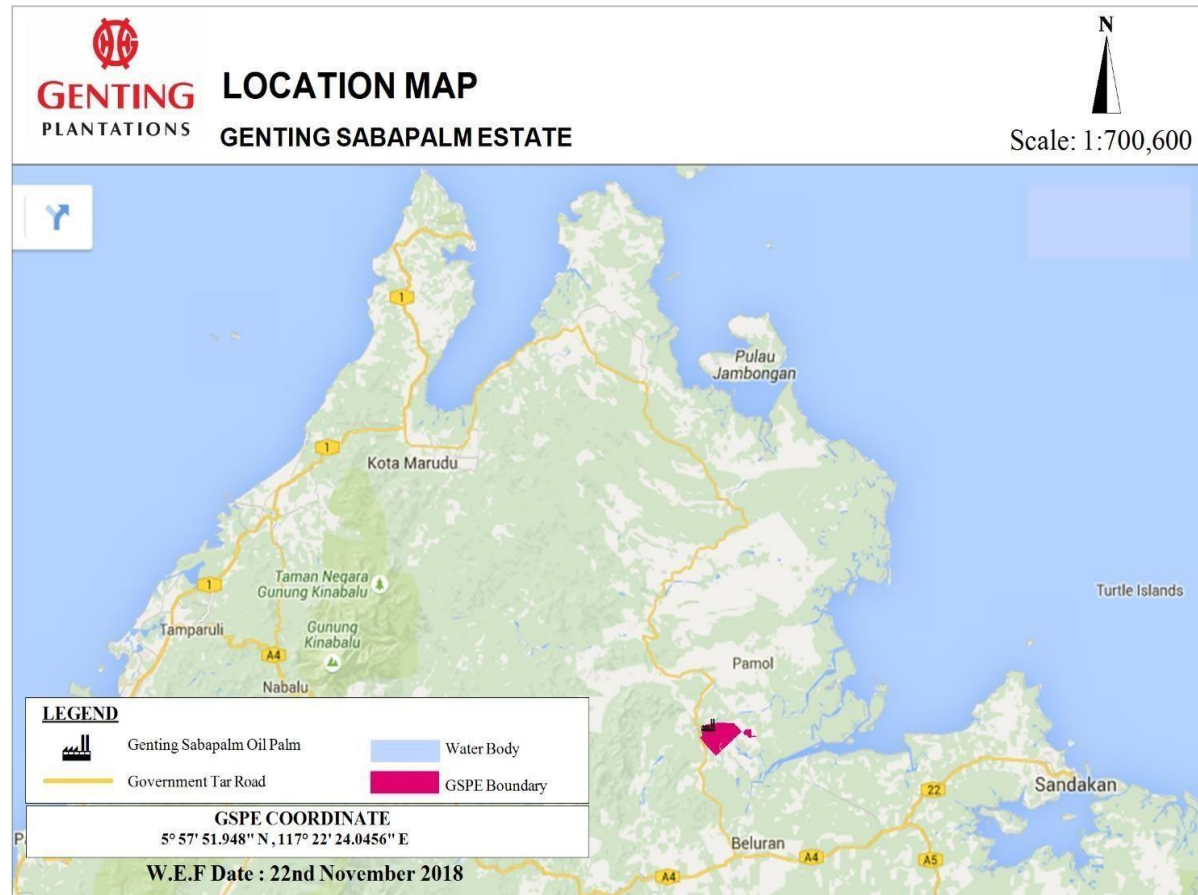
Emissions	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

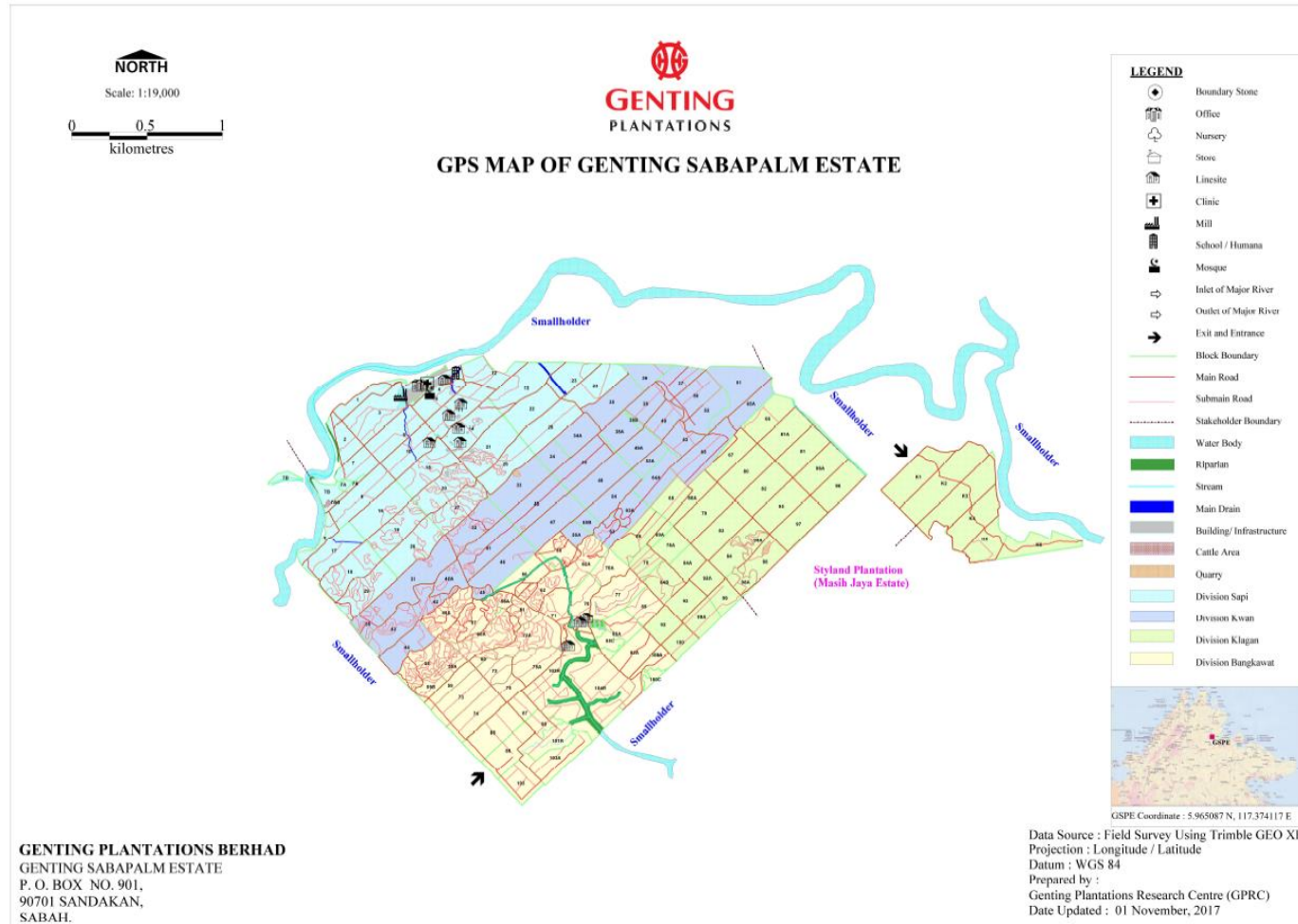
<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

**Appendix C: Location Map of Certification Unit and Supply bases**



**Appendix D: Estate Field Map**



**Appendix E: List of Smallholder Registered and/or sampled**

NA



## Appendix F: 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
ISS	Independent Smallholder Standard
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