

**RSPO PRINCIPLE AND CRITERIA –  
4<sup>th</sup> Annual Surveillance Assessment (ASA4)  
Public Summary Report**

<b>Genting Plantations Berhad</b>
Client company Address: 10 <sup>th</sup> Floor, Wisma Genting Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
Certification Unit: <b>Genting Ayer Item Oil Mill &amp; supply base</b>  Batu 54, Jalan Johor 86100 Air Hitam, Johor, Malaysia

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0086-06-000-00	<b>Membership Approval Date</b>	14/11/2006
<b>Parent Company Name</b>	Genting Plantations Berhad		
<b>Address</b>	10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia		
<b>Subsidiary (Certification Unit Name)</b>	Genting Ayer Item Oil Mill		
<b>Address</b>	Batu 54, Jalan Johor 86100 Air Hitam, Johor, Malaysia		
<b>Contact Name</b>	Mr Tan Cheng Huat (Senior Vice President – Plantation Division)		
<b>Website</b>	<a href="http://www.gentingplantations.com">http://www.gentingplantations.com</a>	<b>E-mail</b>	<a href="mailto:Chenghuat.tan@genting.com">Chenghuat.tan@genting.com</a>
<b>Telephone</b>	+603 2333 6510 (Head office) +607 7631992 (Estate)	<b>Facsimile</b>	+603 2333 6575

2. Certification Information			
<b>Certificate Number</b>	RSPO 653474	<b>Date of First Certification</b>	26/03/2015
		<b>Certificate Start Date</b>	26/03/2016
		<b>Certificate Expiry Date</b>	25/03/2020
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production from Genting Ayer Item Oil Mill and supply base (Genting Kulai Besar, Genting Sri Gading, Genting Sungei Rayat, Genting Tanah Merah & Genting Tebong Estate)		
<b>Applicable Standards</b>	RSPO P&C MY-NI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module D Identity Preserved)		

3. Other Certifications			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
GAIOM, GKBE, GSGE, GSRE, GTME & GTBE: EU-ISCC-Cert-DE119-60173390 ISCC-Plus-Cert-60173390	ISCC EU ISCC PLUS	ASG Cert GmbH ASG Cert GmbH	23/10/2019 23/10/2019
MSPO 682363	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	28/06/2023
MSPO 696629	MSPO MS 2530-4:2013 – General Principles for Oil Palms Plantations and Organized Smallholders		

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GTME: MPOB/CoP/ET0007-2	Code of Good Agricultural Practice for Oil Palm Estates and smallholdings	MPOB	12/07/2020
GAIOM: ISO 9001:2015 – AR 2239 ISO 14001:2015 – ER 0733 OHSAS 18001:2007 – SR 0579 MS 1722:2011 – SR 0580	QMS EMS OHSAS  OSHMS	SIRIM QAS International Sdn Bhd	14/09/2021 14/09/20121 13/01/2020  13/01/2020

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Genting Ayer Item Oil Mill	Ayer Item, Johor, Malaysia	1° 51' 24.2" N	103° 12' 36.0" E
Genting Kulai Besar Estate	Kulai, Johor, Malaysia	1° 36' 55.4" N	103° 36' 45.0" E
Genting Sri Gading Estate	Batu Pahat, Johor, Malaysia	1° 50' 17.8" N	103° 1' 5.6" E
Genting Sungei Rayat Estate	Batu Pahat, Johor, Malaysia	1° 54' 14.2" N	103° 00' 44.6" E
Genting Tanah Merah Estate	Tangkak, Johor, Malaysia	2° 16' 53.9" N	102° 33' 37.2" E
Genting Tebong Estate	Tebong, Melaka, Malaysia	2° 27' 19.9" N	102° 21' 38.4" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Kulai Besar Estate	2,031.52	35.06	775.48	2,842.06	71.48
Genting Sri Gading Estate	3,227.80	29.93	454.79	3,712.52	86.94
Genting Sungei Rayat Estate	2,308.20	0.18	70.60	2,378.98	97.02
Genting Tanah Merah Estate	1,666.35	45.30	89.21	1,800.86	92.53
Genting Tebong Estate	2,101.23	43.19	72.84	2,217.26	94.77
Total	11,335.10	153.66	1,462.92	12,951.68	87.52

\*Area different from previous certified due to re-survey activities

<b>6. Plantings &amp; Cycle</b>							
<b>Estate</b>	<b>Age (Years)</b>					<b>Mature</b>	<b>Immature</b>
	<b>0 – 3</b>	<b>4 - 10</b>	<b>11 - 20</b>	<b>21 - 25</b>	<b>26 - 30</b>		
Genting Kulai Besar Estate	368.22	650.29	369.51	207.28	436.22	1,663.30	368.22
Genting Sri Gading Estate	581.14	1,024.71	614.86	575.87	431.22	2,646.66	581.14
Genting Sungei Rayat Estate	284.39	187.39	964.08	648.53	223.81	2,023.81	284.39
Genting Tanah Merah Estate	298.3	152.89	160.38	279.97	774.81	1,368.05	298.30
Genting Tebong Estate	418.08	256.14	35.39	479.42	912.2	1,683.15	418.08
<b>Total (ha)</b>	1,950.13	2,271.42	2,144.22	2,191.07	2,778.26	9,384.97	1,950.13

<b>7. Certified Tonnage of FFB (Own Certified Scope)</b>			
<b>Estate</b>	<b>Tonnage / year</b>		
	<b>Estimated (March 2018-Feb 2019)</b>	<b>Actual (Jan 2018-Jan 2019)</b>	<b>Forecast (March 2019-Feb 2020)</b>
Genting Kulai Besar Estate	37,652.00	39,526.25	36,630.00
Genting Sri Gading Estate	62,336.00	57,053.24	61,700.00
Genting Sungei Rayat Estate	45,878.00	42,848.56	48,190.00
Genting Tanah Merah Estate	29,782.00	29,573.83	29,830.00
Genting Tebong Estate	33,186.00	27,455.79	29,980.00
<b>Total</b>	208,834.00	196,457.65	206,330.00

<b>8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *</b>			
<b>Estate</b>	<b>Tonnage / year</b>		
	<b>Estimated (March 2018-Feb 2019)</b>	<b>Actual (Jan 2018-Jan 2019)</b>	<b>Forecast (March 2019-Feb 2020)</b>
Nil	N/A	Nil	N/A
<b>Total</b>			

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b>			
<b>Independent FFB Supplier</b>	<b>Tonnage / year</b>		
	<b>Estimated (March 2018-Feb 2019)</b>	<b>Actual (Jan 2018-Jan 2019)</b>	<b>Forecast (March 2019-Feb 2020)</b>
Nil	N/A	Nil	N/A
<b>Total</b>			

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<b>10. Certified Tonnage</b>				
<b>Mill Capacity: 60 MT/hr</b>	<b>Estimated (March 2018-Feb 2019)</b>	<b>Actual (Jan 2018-Jan 2019)</b>	<b>Forecast (March 2019-Feb 2020)</b>	
	<b>FFB</b>	<b>FFB</b>	<b>FFB</b>	
	208,834.00	196,457.65	206,330.00	
	<b>SCC Model: IP</b>	<b>CPO (OER: 20.20 %)</b>	<b>CPO (OER: 20.23 %)</b>	<b>CPO (OER: 21.15 %)</b>
	42,184.47	39,744.04	43,638.80	
	<b>PK (KER: 5.10 %)</b>	<b>PK (KER: 5.06 %)</b>	<b>PK (KER: 5.15 %)</b>	
	10,650.53	9,948.08	10,626.00	

Volume extension 16/3/2019: CPO = 2,554 MT; PK = 947 MT

<b>11. Actual Sold Volume (CPO)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSB</b>		
<b>CPO (MT)</b>	34,066.42	999.75	-	3,896.93	38,963.10

<b>12. Actual Sold Volume (PK)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSB</b>		
<b>PK (MT)</b>	7,583.09	-	-	2,291.38	9,874.47

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

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn Bhd,  
(ASI Accreditation Number: ASI-ACC-067)  
Unit 3, Level 10, Tower A  
The Vertical Business Suites, Bangsar South  
No. 8, Jalan Kerinchi  
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site annual surveillance assessment was conducted from 11/02-15/02/2019. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC CAP effectiveness evidence was verified off-site and confirmed closed on 24/04/2019.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criterias 2013 (MY-NI 2014) and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance.

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

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

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between



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the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

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

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

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

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

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

<b>Assessment Program</b>						
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Initial Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Extension of scope</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Genting Ayer Item Oil Mill	✓	✓	✓	✓	✓	✓
Genting Kulai Besar Estate	-	✓	-	✓	-	✓
Genting Sri Gading Estate	✓	✓	-	-	✓	-
Genting Sungei Rayat Estate	✓	-	-	✓	-	-
Genting Tanah Merah Estate	-	✓	-	-	✓	-
Genting Tebong Estate	-	-	✓	-	-	✓

**Tentative Date of Next Visit:** January 21, 2020 – January 24, 2020

**Total No. of Mandays:** 10 mandays including 1.0 day SC for mill.

**2. 2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>

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<p>Hafriazhar Mokhtar</p> <p>Mohd</p>	<p>Team Leader</p>	<p>Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&amp;C and SCCS standards and recently completed his RSPO P&amp;C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands, Gabon and Nigeria. During assessment, he covered the mill and estate best practices, legal issues, social issues, workers consultation, stakeholder consultation, environmental and occupational safety &amp; health. He is fluent in Bahasa Malaysia and English languages.</p>
<p>Mahzan Munap</p>	<p>Team Member</p>	<p>He holds a MBA from Ohio University and B Sc. in Petroleum Engineering from University of Missouri, USA. Collected over 370 days of auditing experience in OHSAS 18001 and MS 1722 OHSMS (72 days for palm oil milling and 8 days for oil palm plantation). CIMAH competent person with Malaysia Department of Occupational Safety and Health (DOSH) since 1997. An Occupational Safety and Health Trainer at INSTEP PETRONAS. Successfully completed RSPO Lead Assessor Course in 2008 and IRCA accredited Lead Assessor training for ISO 9001 and RABQSA/IRCA EMS Lead Assessor Course for ISO 14001 in 2008. During this assessment, he assessed on the aspects of legal, estate &amp; mill best practices, safety &amp; health, HCV and workers consultation. He is fluent in Bahasa Malaysia and English languages.</p>
<p>Amir Bahari</p>	<p>Team Member</p>	<p>He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 &amp; Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 &amp; also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, workers consultation and occupational safety &amp; health. He is fluent in both verbal/written in Bahasa Malaysia and English.</p>

**Accompanying Persons:**

No.	Name	Role
Nil	N/A	N/A

**2.3 Assessment Plan**

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

Date	Time	Subjects	HMM	MM	AB
Sunday 10/2/2019	PM	Audit Team travelling to Batu Pahat (Just Hotel)	✓	-	-
Monday 11/2/2019	0830 – 1630	<b>Genting Ayer Item Palm Oil Mill: RSPO Supply Chain</b> for CPO mill, weighbridge and storage area	✓	-	-
	PM	Audit Team travelling to Kulai (Castello Hotel)	✓	✓	✓
Tuesday 12/2/2019	0830 – 0900	Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize</li> <li>• Audit plan (including stakeholder’s consultation).</li> <li>• Verification on previous audit findings</li> </ul>	✓	✓	✓
	0900 – 1200	<b>Genting Kulai Besar 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.	✓	✓	✓
	1200 – 1300	<b>Lunch</b>			
	1300 – 1600	<b>Genting Kulai Besar Estate:</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	✓	✓	✓
Wednesday 13/2/2019	1600	Interim Closing Briefing Audit Team travelling to Batu Pahat (Just Hotel)	✓	✓	✓
	0830 – 1200	<b>Genting Ayer Item Palm Oil Mill:</b> Inspection of FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	✓	✓	✓

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	1000 – 1100	<b>Meeting with stakeholders</b> (local community rep. neighbors, smallholders, workers/Union rep, vendor etc.)	✓	-	-
	1200 – 1300	<b>Lunch</b>			
	1300 – 1600	<b>Genting Ayer Item Palm Oil Mill:</b> Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.  Verify previous nonconformities.	✓	✓	✓
	1600	Interim Closing Briefing Audit Team travelling to Tampin (Caspari Hotel)	✓	✓	✓
Thursday 14/2/2019	0830 – 1200	<b>Genting Sungei Rayat 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.  Verify previous nonconformities.	✓	✓	✓
	1000 – 1100	<b>Meeting with stakeholders</b> (local community rep. neighbors, smallholders, workers/Union rep, vendor etc.)	✓	-	-
	1200 – 1300	<b>Lunch</b>			
	1300 – 1600	<b>Genting Sungei Rayat Estate:</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).  Verify previous nonconformities.	✓	✓	✓
	1600	Interim Closing Briefing	✓	✓	✓

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Friday 15/2/2018	0830 – 1200	<b>Genting Tebong 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.  Verify previous nonconformities.	✓	✓	✓
	1000 – 1100	<b>Meeting with stakeholders</b> (local community rep. neighbors, smallholders, workers/Union rep, vendor etc.)	✓	-	-
	1200 – 1300	<b>Lunch</b>			
	1300 – 1600	<b>Genting Tebong Estate:</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).  Verify previous nonconformities.	✓	✓	✓
	1600 – 1630	Audit team discussion & findings preparations	✓	✓	✓
	1630	Closing Meeting <ul style="list-style-type: none"> <li>• Presentation of report by BSI Lead Auditor – briefing &amp; discussion of findings</li> <li>• Acceptance &amp; acknowledgement by Genting Ayer Item Palm Oil Mill &amp; Estates</li> <li>• Audit Team travel back to KL</li> </ul>	✓	✓	✓

### Section 3: Assessment Findings

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

- TDM Plantation Sdn Bhd / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

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

Time Bound Plan		
Requirement	Remarks	Compliance
<b>Summary of the Time Bound Plan</b>		
Does the plan include all subsidiaries, estates and mills?	All subsidiaries, estates, mills and refinery (existing operations and yet to be constructed) except those estates (landholdings) planned to be developed into property development ( West Malaysia).	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	The first oil mill and its supply bases were certified in 2015.	Yes
Is the time bound plan challenging? <ul style="list-style-type: none"> <li>• Age of plantations.</li> <li>• Location.</li> <li>• POM development</li> <li>• Infrastructure.</li> <li>• Compliance with applicable law.</li> </ul>	Based on age of plantations, location, existing POM facilities and infrastructure as well as status of compliance with applicable law, the time bound found to be challenging.	Yes
Have there been any changes since the last audit? Are they justified?	On 12 October 2017, the RSPO Secretariat released a statement on Hak Guna Usaha (HGU) to Indonesian stakeholders ( <a href="https://rspo.org/news-and-events/announcements/revised-rspo-updated-statement-on-hak-guna-usaha-july-2018">https://rspo.org/news-and-events/announcements/revised-rspo-updated-statement-on-hak-guna-usaha-july-2018</a> ), The statement set out the requirements on legality of land, whereby an RSPO grower member's rights to land must be in the form of a legitimate HGU and Izin Usaha Perkebunan (IUP), prior to obtaining RSPO certification.	Yes

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	<p>Pursuant to this, which was effective as of 12 October 2017, RSPO members must have a legitimate right to cultivate (Hak Guna Usaha or a HGU) and IUP in order to secure the RSPO certificates.</p> <p>As of Feb 2019, only 2 PTs in Indonesia have obtained the HGU. The rest are in process of applying for the HGU. Due to the unpredictable timeline for the HGU process, the company will revise this TBP according to the issuance of the HGU.</p>	
If there have been changes, what circumstances have occurred?	No any circumstances occur that lead to any changes.	N/A
Have there been any stakeholder comments?	No comments received.	Yes
Have there been any newly acquired subsidiaries?	No new acquisition as of 1 Feb 2019.	Yes
If yes, have the newly acquisitions certified within a three-year timeframe?	Not applicable	N/A
Have there been any isolated lapses in implementation of the plan?	No lapses however re-scheduling of the certification dates has been made.	Yes
<b>Un-Certified Units or Holdings</b>		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	<p><u>Sabah</u></p> <p>1. Genting Kencana Estate – LUCA passed, Concept Note for Remediation and Compensation submitted to Panel. Concept Note under revision and to be re-submitted to the Panel in 1Q 2019.</p> <p>2. Genting Jambongan Estate – Concept Note and Remediation Plan has been submitted to RSPO. RSPO allowed for Genting Jambongan to proceed with its certification programme.</p> <p><u>Indonesia</u></p> <p>1. PT SISIM – LUCA passed. Concept Note and Remediation Plan submitted and approved by Panel.</p> <p>Action plan to be checked by auditor during the next audit.</p> <p>2. PT GAL – LUCA under review by RSPO.</p>	Yes
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings	NPP for PT PALJ, PT AAC, PT UAI, PT SMA, PT KIU are in progress.	Yes

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

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

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

**3.4 Details of findings**

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

During the Annual Surveillance Assessment there were two (2) Major & two (2) Minor nonconformities raised. The Genting Ayer Item Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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



<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1740419-201902-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.1.3 Major
<b>Date Issued</b>	15/02/2019	<b>Due Date</b>	15/05/2019
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	24/4/2019
<b>Statement of Nonconformity:</b>	Plans for avoidance or mitigation of impacts related to absconded workers issues were not adequate.		
<b>Requirement Reference:</b>	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.		
<b>Objective Evidence:</b>	GSRE & GTBE: Records of workers in 2018 shown a total of 22 & 25 absconded foreign workers in GSRE and GTBE respectively. External stakeholders consulted in GTBE complaining that few of those absconded workers even left big amounts of unpaid groceries debts. These absconded foreign workers issue might potentially lead to local and national social issues.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- To ensure approval for leave application must be due to reasonable reason (supporting documents where applicable) by the applicants.</li> <li>- To promote the existing complaint channel for those workers having problem to share their problem.</li> <li>- Identify indiscipline worker for consultation session, sharing their problem and advice.</li> </ul>		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- Not return after taken leave / own plan</li> <li>- Suddenly missing /Influence by friends</li> <li>- Discipline issue /unfit to work</li> </ul>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Ensure workers aware on the implication of blacklisted by the authorities should they not return after taken leave.</li> <li>- Schedule for consultations session and advice. And follow-up session to ensure workers feel that they are taken care and their problems are solved.</li> <li>- To train immediate mandore/supervisor to act as eyes and ears of management in detecting workers' intent to move before it happens and notify management in advance to take preventive actions.</li> <li>- To brief workers on implication of indiscipline towards their performance and future impact.</li> <li>- Immediately deport unfit workers upon documentations.</li> </ul>		
<b>Assessment Conclusion:</b>	Off-site Major NC evidence verification: <ul style="list-style-type: none"> <li>- Records of briefing to workers</li> <li>- Records of consultation session.</li> <li>- Records of briefing to mandores &amp; supervisors</li> <li>- Records of unfit workers deported immediately upon receiving medical report.</li> </ul> Evidence shown consistency of implementation of the corrective action and verified effective to address the issue. Hence, Major NC was closed on 24/4/2019 since evidence provided sufficient for off-site verification.		

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1740419-201902-M2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.1.1 Major
<b>Date Issued</b>	15/02/2019	<b>Due Date</b>	15/05/2019
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	24/4/2019
<b>Statement of Nonconformity:</b>	a) The total tonnage of the approved limit was not complied with. b) The requirement of chemicals containers labelling was not in accordance to OSH CLASS Regulation 2013.		
<b>Requirement Reference:</b>	Evidence of compliance with relevant legal requirements shall be available.		
<b>Objective Evidence:</b>	a) GAIOM - The total FFB processed in the entire year 2018, (1/2/18 – 31/1/19) is 196358.23 mt exceeding 4358.23 mt equivalent to 2.27 % of the approved quantity of 192000 mt. b) GSRE – there was no labelling made at the chemical containers storing the balance chemicals at the pre-mixing area.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- Request MPOB to provide documented evidence on the 10% allowance from the approved limit.</li> <li>- To alert estates and MPP (Marketing &amp; Palm Products Dept) to divert the excess crop to 3rd party mills.</li> <li>- The chemical containers were labeled according to the regulation</li> </ul>		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- The mill management was guided by the 10% allowance as informed verbally by MPOB.</li> <li>- Training yet to be done to newly employed storekeeper on the labelling of chemical containers.</li> </ul>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Monthly monitoring to ensure received crop does not exceed the approved limit.</li> <li>- Storekeeper and Assistant Manager in charge to ensure all premix chemical used must have correct labelling through daily inspection at the balance chemical store.</li> <li>- Re-training of storekeeper on chemical handling, mixing and labelling to be conducted by chemical supplier</li> </ul>		
<b>Assessment Conclusion:</b>	<p>Off-site Major NC evidence verification:</p> <ul style="list-style-type: none"> <li>- Correspondence records with MPOB</li> <li>- Correspondence records with MPP and estates</li> <li>- Monthly monitoring records</li> <li>- Training records &amp; photo of the labelled containers.</li> </ul> <p>Evidence shown consistency of implementation of the corrective action and verified effective to address the issue. Hence, Major NC was closed on 24/4/2019 since evidence provided sufficient for off-site verification.</p>		

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1740419-201902-N1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.6.10 Minor
<b>Date Issued</b>	15/02/2019	<b>Due Date</b>	Next annual surveillance assessment

<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open
<b>Statement of Nonconformity:</b>	Disposal of waste material according to procedures not fully demonstrated being understood by workers.		
<b>Requirement Reference:</b>	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated.		
<b>Objective Evidence:</b>	GAIOM: Seen domestic waste not properly dumped in bins and scattered on the ground in front of Block E workers quarters. Found also 2 pieces of fluorescent lamps (SW) in the domestic bin in front of Block A workers quarters. Recycle bins in front of office not being although recyclable waste found inside non-recycle bin.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- The domestic wastes were cleared and send to landfill area and segregation done for all the recycle wasted to the respective bins.</li> <li>- The two pieces of fluorescent lamps were transfered to Scheduled Waste store, and recorded in eSWIS inventory.</li> </ul>		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- Inadequate training and monitoring to workers on domestic and recyclable waste management.</li> <li>- Handling of electronic waste (SW110) not covered in mill's Scheduled Waste Procedure.</li> </ul>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- To train all the workers and residents on domestic &amp; recyclable waste management and continuously follow up.</li> <li>- Amend mill's Scheduled Waste procedure to include the electronic waste (SW110).</li> <li>- To train all the workers and management personnel on the electronic waste management.</li> </ul>		
<b>Assessment Conclusion:</b>	Corrective action plan accepted. Evidence of its effectiveness to be verified in next assessment.		

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1740419-201902-N2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.1.3 Minor
<b>Date Issued</b>	15/02/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open
<b>Statement of Nonconformity:</b>	The requirement of A4 Electrical Chargeman Competent Person (at Mill) was not addressed as per Electricity Supply Act 1990.		
<b>Requirement Reference:</b>	A mechanism for ensuring compliance shall be implemented.		
<b>Objective Evidence:</b>	GAIOM: Found that no A4 Chargeman was made available at Ayer Item Palm Oil Mill.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- To register mill's wireman for the chargeman competency course.</li> <li>- To advertise on the vacant position through:               <ul style="list-style-type: none"> <li>o banner at strategic area at town</li> <li>o online channel ie Jobstreet, and newspaper</li> </ul> </li> </ul>		
<b>Root Cause Analysis:</b>	Chargeman A4 has resigned in 2015 and difficult to find the replacement.		

<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- To ensure the mill's wireman complete the full competency course until obtain competency for A4.</li> <li>- To approach relevant channel and media for future replacement especially on competent person ie to join any career carnival organized by Jabatan Tenaga Kerja, online advertising ie Job Street etc.</li> </ul>
<b>Assessment Conclusion:</b>	Corrective action plan accepted. Evidence of its effectiveness to be verified in next assessment.

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>OFI 1</b>	Nil

<b>Positive Findings</b>	
<b>PF #</b>	<b>Description</b>
<b>PF 1</b>	The mill has adopted a methodology in introducing the rice husk being applied onto the surface of the effluent pond of the final discharge. This is aimed to reduce the presence of algae at the surface, thus able to improve to a lower level of the BOD.
<b>PF 2</b>	The estates had begun to experiment the LF collector (scavenger) via a designed machine as an implement attached to a tractor. This has been targeted to increase the productivity with additional coverage using less labour. The numbers related to the productivity and performance has yet to be officialised at the time of audit.
<b>PF 3</b>	The estates had introduced the usage of powered wheel barrow to reduce the human burden of the mechanical wheel barrow in collection of crop and LF to the platform. This system is in experimental trail and will be finalised soon.
<b>PF 4</b>	The spraying operations mainly on the P&D at immature fields have been improved through the introduction of a motorised <i>mantis</i> sprayer. This operation has reduced reliance on the high no of workers with an improved coverage.

### 3.4.1 Status of Nonconformities Previously Identified and Observations

<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1579822-201801-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.5.1 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	21/03/2018
<b>Statement of Nonconformity:</b>	Pay of the workers who worked on rest day was not according to the requirements.		
<b>Requirement Reference:</b>	Documentation of pay and conditions shall be available.		
<b>Objective Evidence:</b>	<p><b>Genting Sri Gading Estate and Genteng Tanah Merah Estate:</b>            Verified on the Checkroll Book, Despatch Notes and payslips for December 2017 for the harvester, loader, driver and manuring worker found that they were not paid twice the ordinary rate per piece for work on rest day as per the requirements. Sampled of workers as below:</p> <ul style="list-style-type: none"> <li>i. Employee No.: 03694 (GSGE)</li> <li>ii. Employee No.: 03671 (GSGE)</li> <li>iii. Employee No.: 03699 (GSGE)</li> </ul>		

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	<ul style="list-style-type: none"> <li>iv. Passport No.: B5359400 (GSGE Contractor’s Worker)</li> <li>v. Passport No.: S789592 (GTME Contractor’s Worker)</li> <li>vi. Passport No.: B5359388 (GTME Contractor’s Worker)</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>1. Group policy on Rest Day/Public Holiday work (only with written approval by VP) was issued on 1 Jan 2018.</li> <li>2. Agreement with workers (v2.0 dated 1/1/18) - clause 10, was amended to include both the daily rated and piece rated workers.</li> <li>3. Consultation and continuous reminder to be made with ‘piece rated’ and ‘daily rated’ employees to explain as per the memorandum/policy dated 1 Jan 2018.</li> </ul>
<b>Assessment Conclusion:</b>	<p>ASA4 verification: Documentation of pay and conditions available where harvesters and sprayers piece-rate prices were based on MAPA Circular # 46/2018; Date: 21/12/2018 where Genting Plantations Berhad established the following rates: - Contracted FFB Harvesting Rate; Month Jan-19; CPO Price: RM 1,849.50 according to palm field yield bracket This confirmed that no recurrence of issue. Hence, Major NC remained closed.</p>

<b>Non-Conformity</b>																						
<b>NCR Ref #</b>	1579822-201801-M2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.5.2 Major																			
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	21/03/2018																			
<b>Statement of Nonconformity:</b>	<ul style="list-style-type: none"> <li>1) Genting Ayer Item Oil Mill did not follow the terms and conditions outlined in the letter from authority for the overtime hours.</li> <li>2) Terms and conditions outlined in the employment contract were found to be potentially promoting discrimination and force labour.</li> </ul>																					
<b>Requirement Reference:</b>	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.																					
<b>Objective Evidence:</b>	<p><b>Genting Ayer Item Oil Mill:</b> Verified the letter from Pejabat Tenaga Kerja Kluang with Ref. No. (3)d/m.JTK/KG/10103 dated 7/9/2014 responded to the application of overtime hours by the mill. No permit will be issued by Labour Department where only ‘Self-regulation’ required. There were terms and conditions stated in the letter such as the maximum overtime hours per month is 130 hours, consent letter from the workers, workers are not allowed to continuously work for 5 hours without 30 minutes of resting time. However, verified the overtime records and payslips found that the sampled workers below have exceeded the 130 hours and consent letter that acknowledged by the workers was not available:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Month</th> <th style="text-align: left;">Employee No</th> <th style="text-align: left;">Total OT (hours)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">April 2017</td> <td>2846F</td> <td>141</td> </tr> <tr> <td>2841F</td> <td>158</td> </tr> <tr> <td>2840F</td> <td>157</td> </tr> <tr> <td rowspan="4">November 2017</td> <td>2801F</td> <td>172</td> </tr> <tr> <td>2801F</td> <td>194</td> </tr> <tr> <td>2841F</td> <td>194.5</td> </tr> <tr> <td>2817F</td> <td>177.5</td> </tr> </tbody> </table>			Month	Employee No	Total OT (hours)	April 2017	2846F	141	2841F	158	2840F	157	November 2017	2801F	172	2801F	194	2841F	194.5	2817F	177.5
Month	Employee No	Total OT (hours)																				
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	<table border="1"> <tr> <td></td> <td>2800F</td> <td>210.5</td> </tr> <tr> <td>December 2017</td> <td>2920F</td> <td>174.5</td> </tr> <tr> <td></td> <td>2800F</td> <td>181.5</td> </tr> <tr> <td></td> <td>2844F</td> <td>176.5</td> </tr> <tr> <td></td> <td>2911F</td> <td>167.5</td> </tr> </table>		2800F	210.5	December 2017	2920F	174.5		2800F	181.5		2844F	176.5		2911F	167.5	<p><b>Genting Ayer Item Oil Mill, Genting Sri Gading Estate and Genting Tanah Merah Estate:</b>  Verified the employment contracts found that the following terms were inappropriate which could lead to discrimination and force labour as below:</p> <ul style="list-style-type: none"> <li>i. Clause 3.2 - The management has the rights to transfer the workers to any plantations or mills.</li> <li>ii. Clause 14 - The working tools are only provided for the first time during their arrival to the estates.</li> </ul> <p>Clause 26 - Workers must surrender their passport to the management for safekeeping.</p>
	2800F	210.5															
December 2017	2920F	174.5															
	2800F	181.5															
	2844F	176.5															
	2911F	167.5															
<p><b>Corrective Actions:</b></p>	<ol style="list-style-type: none"> <li>1. Weekly monitoring of OT to ensure total whole month not exceed 130 hours. Compliances monitoring of the "Permit Kerja Lebih Masa" is included in the List of Licenses, Written Approvals and Permits.</li> <li>2. The employment contract template has been revised. The employment contract is be monitored and review yearly to meet the latest sustainability requirements as well as legal requirements.</li> </ol>																
<p><b>Assessment Conclusion:</b></p>	<p>ASA4 verification:  Agreements with full details of payments and conditions of employment were provided and explained to workers based on interview with sample workers and records of following:</p> <p>GKBE Checkroll workers sample agreements:</p> <ul style="list-style-type: none"> <li>- Workers ID # 03130; Date joined: 8/1/2018; Post: Manuring Gang</li> <li>- Workers ID # 03068; Date joined: 2/6/2015; Post: Sprayer</li> <li>- Workers ID # 02989; Date joined: 16/5/2013; Post: Auxiliary Police</li> </ul> <p>GKBE Contractor workers sample agreements:</p> <ul style="list-style-type: none"> <li>- Workers ID # B 1568478; Date joined: 1/9/2016; Post: Harvester; Contractor: Vimesh Enterprise</li> <li>- Workers ID # B 2898254; Date joined: 8/11/2017; Post: Harvester; Contractor: Woon Nyong Kwee</li> </ul> <p>GAIOM Checkroll workers sample agreements:</p> <ul style="list-style-type: none"> <li>- Workers ID # 02923; Date joined: 25/11/2017; Post: Workshop Fitter</li> <li>- Workers ID # 2877F; Date joined: 29/4/2016; Post: General Worker (Process)</li> <li>- Workers ID # 2947F; Date joined: 10/12/2018; Post: General Worker (Process)</li> <li>- Workers ID # 00323; Date joined: 2/5/2018; Post: General Auxiliary Police</li> </ul> <p>GSRE Checkroll workers sample agreements:</p> <ul style="list-style-type: none"> <li>- Workers ID # 02845; Date joined: 26/7/2017; Post: Sprayer</li> </ul> <p>GSRE Contractor workers sample agreements:</p> <ul style="list-style-type: none"> <li>- Workers ID # AT498533; Date joined: 2/6/2013; Post: Harvester; Contractor: Ong Shek Enterprise</li> </ul>																

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	<ul style="list-style-type: none"> <li>- Workers ID # B9968931; Date joined: 17/10/2018; Post: Harvester; Contractor: Koo Development Construction</li> <li>- Workers ID # B1573774; Date joined: 12/8/2017; Post: Harvester; Contractor: GJS Agrotech Enterprise</li> </ul> <p>GTBE Checkroll workers sample agreements:</p> <ul style="list-style-type: none"> <li>- Workers ID # 03608; Date joined: 1/10/2018; Post: General Worker</li> <li>- Workers ID # 02917; Date joined: 29/9/2019; Post: Harvester</li> </ul> <p>GSRE Contractor workers sample agreements:</p> <ul style="list-style-type: none"> <li>- Workers ID # B2592206; Date joined: 14/6/2016; Post: Harvester; Contractor: Thavarajan Enterprise</li> <li>- Workers ID # AT942600; Date joined: 24/2/2017; Post: Harvester; Contractor: Hu Kim Soon Contractor</li> <li>- Workers ID # AT645048; Date joined: 21/5/2013; Post: Harvester; Contractor: Tey Thiam Hock</li> </ul> <p>This confirmed that no recurrence of issue. Hence, Major NC remained closed.</p>
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<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1579822-201801-M3	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.6.11 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	21/03/2018
<b>Statement of Nonconformity:</b>	The management was not follow the established manual (Oil Palm Manual, OPM No 6: Weeding-Weed Management, Clause 1.2: Medical surveillance and record on sprayer- "..... shall be examined by medical doctor registered with DOSH on bi-annual basis")		
<b>Requirement Reference:</b>	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.		
<b>Objective Evidence:</b>	GSGE and GTME was done medical surveillance once in 2017 (4/4/17 at GSGE and 3/1/17 at GTME).		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- GPA to circulate the amended OPM No.6 – Weeding to OUs by 9 Mar 2018.</li> <li>- Verification by Sustainability Dept and Plantation Dept (PD) during Sustainability Internal Audit annually to ensure OPM is consistent with relevant laws/ regulations as well as implementations on the ground.</li> </ul>		
<b>Assessment Conclusion:</b>	<p>ASA4 verification: Annual medical surveillance had been conducted at the visited OU as follows:</p> <ul style="list-style-type: none"> <li>- On 13.12.2018 at Kulai Besar Estate and Kulai Besar North for 9 workers (5 Sprayers, 3 Manurers, 1 Manuring Mandore and 1 Foreman) and 5 Sprayers respectively at Klinik Siti, Indahpura, Kulai. They were examined by Dr. Siti Aishah Binti Abdul Rahim, (OHD/HQ/15/DOC/00/414) and found fit to work without restrictions or limitations.</li> <li>- On 25.1.2019 to 31.1.2019 for 31 workers at Ayer Item POM. Awaiting results from RZ Intan Medicare as the doctor in attendance Dr. Zainudin B Muid (OHD/HQ/08/00/468) was away overseas.</li> <li>- On 28.3.2108 for 32 workers at Sungai Rayat Estate by Dr. Hussain B Moiz, (OHD/HQ/17/DOC/00/00005). Results showed all 32 workers fit to work.</li> <li>- On 17, 20 and 23<sup>rd</sup> May 2018 for 42 workers at Tebong Estate. They were examined by Dr. Kueh Poh Siew, (OHD/HQ/08/DOC/00/503) from Klinik Tampin. Results of examination found all 42 workers fit to work.</li> </ul>		

<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1579822-201801-M4	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.7.2 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	21/03/2018
<b>Statement of Nonconformity:</b>	Activities related to risk activities are no identified.		
<b>Requirement Reference:</b>	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.		
<b>Objective Evidence:</b>	<p>The following activities was not assessed appropriately:</p> <ul style="list-style-type: none"> <li>- Mill - During the field assessment at the mill, it was observed that lorry driver is opening the canvas at height. However, the activity was not identified in the HIRARC.</li> <li>- Estate - Replanting activities did not appropriately identify the heat stress risk and its management. The risk identified is low and now management was identified.</li> <li>- Estate - The risk mitigation for canvas covering identify was using of trolley to carry heavy items.</li> <li>- Estate - The category of hazard in HIRARC is not identified consistently. Example for chemical preparation, there Category of Hazard while replanting there is no Category of Hazard.</li> </ul>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Awareness and competency training has been conducted by SHO to the person in-charge at GSGE on 23/03/2018 and at GAIOM on 01/03/2018.</li> <li>- The 2018 annual training program on safety and health has been planned to ensure continuous adequate training is provided to the operating units person in charge.</li> <li>- Memo issued by SHO to inform HIRARC is required to review periodically (every 3 months) with Safety committee and check the effectiveness on the implementation of HIRARC when conduct internal audit.</li> </ul>		
<b>Assessment Conclusion:</b>	<p>ASA4 verification: All operations have been risk assessed as per SOP for HIRARC (OM-GPB-07, Rev:0, Date:1/1/2010) and documented to address the identified issues. The end product, individual Risk register had been established at the POM and estates visited.</p> <p>HIRARC established at the mill were not limited to the following:</p> <ol style="list-style-type: none"> <li>i. Maintenance and servicing – pump, press, lightning arrester</li> <li>ii) Welding and cutting job, electrical works</li> <li>iii) Sterilizer – operation, cages handling, capstan line</li> <li>iv) FFB processing from stripping, oil extraction to storage and CPO dispatch and treatment of by-products/waste</li> <li>i) Boiler house – ash removal from hopper chute, maintenance. Furnace cleaning, clinkers raking activities, determining control and PPE standards</li> <li>ii) Engine room operation</li> <li>iii) Oil and effluent water sampling and analysis</li> </ol> <p>Whereas at the estates, examples include activities or areas such as:</p>		



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	<ul style="list-style-type: none"> <li>i) Chemical spraying;</li> <li>ii) Harvesting;</li> <li>iii) Pruning;</li> <li>iv) Manuring;</li> <li>v) Weeding;</li> <li>vi) Rat baiting and bag worm treatment;</li> <li>vii) FFB loading, collection and transporting;</li> <li>viii) Transporting of workers;</li> <li>ix) Workshop operations;</li> <li>x) Chemical, fertilizer and lubrication store;</li> <li>xi) Genset operation and maintenance;</li> <li>xii) Road maintenance.</li> </ul> <p>For every hazard recognized in the Risk Register their corresponding actions have been documented and implemented to address the identified issues.</p> <p>HIRARC Register was last updated at GAIOM on 5.7.2018, at Sungei Rayat Estate 29.11.2018, at Tebong Estate on 1.8.2018.</p> <p>With respect to CHRA, all precautions recommended by the Assessor had been properly observed and applied to the workers. CHRA at the CU was conducted by DOSH Registered Assessor ID, JKPP HIE 127/171-2(154) from QMSPRO Sdn Bhd, Johor Bahru and the report validity period is still valid.</p> <p>This confirmed that no recurrence of issue. Hence, Major NC remained closed.</p>
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<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1579822-201801-N1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.5.3 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	15/02/2019
<b>Statement of Nonconformity:</b>	Condition of the linesite's compound was unsatisfied and linesite inspection was not carried out as per the national standard.		
<b>Requirement Reference:</b>	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.		
<b>Objective Evidence:</b>	<ul style="list-style-type: none"> <li>i. Site visit to the worker's quarters in GAIOM and found that the perimeter drain was blocked at House Ramli bin Markon.</li> <li>ii. Reviewed on the Linesite Inspection records found that the inspection was carried out once a month instead of weekly basis in Genting Ayer Item Oil Mill and Genting Sri Gading Estate.</li> </ul>		
<b>Corrective Actions:</b>	To ensure regular monitoring and compliance with the Workers Minimum Standards of Housing and Amenities Act 1990		
<b>Assessment Conclusion:</b>	ASA4 verification: Adequate housing, water supplies, medical, educational and welfare amenities provided accordingly. Assurance provided by management through monitoring as following:  GKBE:		

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	<p>Monitoring recorded in Line Site Inspection Book. Weekly inspection conducted, latest on 7/2/2019. Previous inspection done on 31/1/2019.</p> <p>GAIOM:</p> <p>Monitoring done by Production Executive recorded in Linesite Inspection Monitoring Book.</p> <p>This confirmed that the CAP implemented was effective to address the issue. Hence, Minor NC was closed on 15/2/2019.</p>
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<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1579822-201801-N2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.7.3 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	15/02/2019
<b>Statement of Nonconformity:</b>	The work place safety is not implemented effectively.		
<b>Requirement Reference:</b>	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.		
<b>Objective Evidence:</b>	<p>The following activities was not implemented according to the HIRARC:</p> <ol style="list-style-type: none"> <li>1. CPO dispatch – during the pumping of the CPO, the worker performing this job is required to wear safety harness and safety helmet. However, during the field visit, it was observed that this was not performed by the TTK lorry driver.</li> <li>2. FFB unloading – it was observed that the lorry drivers that deliver the FFB was not wearing PPE as describe in the HIRARC. The HIRARC had identified that PPE such as helmet, safety shoes and safety vest is required.</li> </ol>		
<b>Corrective Actions:</b>	<p>GAIOM: Issue memo to all the transporter saying that any driver without proper PPE will be prohibited from entering mill premise.</p> <p>GSGE &amp; GTME:</p> <ol style="list-style-type: none"> <li>1. Estate to do enforcement by doing daily PPE inspection during rollcall.</li> <li>2. Estate to provide adequate safety training and awareness to the workers esp with high risk potential of accidents.</li> </ol>		
<b>Assessment Conclusion:</b>	<p>ASA4 verification: During field assessment, Sprayers and Harvesters were able to inform the assessment team about the fundamental of safety, the reason to work safely, the need to follow safe work practices and the consequence of deviation from procedures. For example, the machine-assisted sprayers understood not to spray upwind as the spray drift could be blown to their body, face and work clothings and if these parts of the body were exposed to the drift mist they could be harmful to them. On long-term they inform they could get sick. It is, they said, not only to spray follow downwind but also the need to wear the PPE properly.</p> <p>Likewise, boiler fireman at the mill was asked the danger of his work. He said during raking of ashes fly hot ash and fire splinters could land on the body and cause burn to the exposed skin if any. The surrounding area is also noisy.</p>		

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	<p>Therefore, there is need to put on apron, long sleeve shirt and long pants, leather gloves, goggles, face mask, hard hat and ear plug to prevent from being harm by the hot ash, fire splinters and noisy environment.</p> <p>All workers at the mill and estates have been trained to read safety signages and safe working practices including SOP for donning PPE related to their job function. See Criteria 4.8 for sample of training given.</p> <p>Adequate PPE has been seen provided to workers. In the sampled interviewed and workers sighted, PPE worn was found appropriate and in good condition. Damage PPE will be replaced by the company free of charge.</p> <p>This confirmed that the CAP implemented was effective to address the issue. Hence, Minor NC was closed on 15/2/2019.</p>
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<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1579822-201801-N3	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.1.2 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	15/02/2019
<b>Statement of Nonconformity:</b>	The mitigation and management plan is not developed correctly.		
<b>Requirement Reference:</b>	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.		
<b>Objective Evidence:</b>	<p>Minor – The established mitigation plan and Environment Improvement &amp; management plan was not developed appropriately according to the identified activities and RSPO requirements. Example of activities identified:</p> <ol style="list-style-type: none"> <li>1. Plantations Area – fertilizer application. The output identified is fertilizer washed off. The equipment identified for mitigating this output is using first aid kit, clean water container for washing, food container for food storage. These equipment cannot be related on how it can mitigate the impact.</li> <li>2. Internal transportation. The output identified is noise. The control measures is to have noise monitoring test. However, the testing results is not available.</li> <li>3. Replanting. The output of the replanting activities were not identified fully.</li> <li>4. Timeline, person in-charge and Status were not updated in the Environment Improvement &amp; management plan dated 14/01/2018.</li> </ol>		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Training to the PIC by Sustainability Dept (at lease once a year or whenever necessary).</li> <li>2. To ensure all activities with impacts to the environment are assessed and covered in the EAI.</li> <li>3. To review the EAI and the mitigation plans at least once a year.</li> <li>4. To ensure Environment Improvement &amp; Management Plan are updated accordingly at lease once a year.</li> </ol>		
<b>Assessment Conclusion:</b>	<p>ASA4 verification: Identification of impacts was elaborated in 5.3.3 under title "<i>waste management and disposal plan to avoid or reduce pollution</i>". Therein being shown the time line and the person in charge of the management plan. The management plan is</p>		

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	<p>reviewed annually. The Waste Management and Disposal Plan 2019 comprising of Pollution Prevention Plan 2019. Among others the pollution prevention being identified are;</p> <ul style="list-style-type: none"> <li>a) The control of black smoke emissions,</li> <li>b) monitoring watercourse quality</li> <li>c) Scheduled waste management             <ul style="list-style-type: none"> <li>- Segregation. To ensure contaminated waste been stored.</li> <li>- Recycle. To collect &amp; sell scrap iron.</li> </ul> </li> <li>d) Effluent discharge monitoring.</li> <li>e) Production activities             <ul style="list-style-type: none"> <li>- Reduce of cotton rags usage. To use fibre for cleaning CPO spillage /oil leaking</li> <li>- Reused of biomass waste. To max utilisation of fibre/shell as boiler fuel.</li> </ul> </li> </ul> <p>Sighted records of monitoring by the mill.</p> <p>The estates made no major changes to the environmental aspects and impacts or current practices which require changes in the environmental action plans. On a continual basis the existing environmental action plans had identified timeframes and responsible person at each operating unit assessed. This being discussed during the OSH meeting and Management Review</p> <p>This confirmed that the CAP implemented was effective to address the issue. Hence, Minor NC was closed on 15/2/2019.</p>
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<b>Opportunity for Improvement</b>	
OFI#	Description
OFI 1	Nil

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
Minor 01	Minor	4.3.4	18/14/2014	Closed 31/01/2015
Major 02	Major	4.4.1	18/14/2014	Closed 31/01/2015
Major 03	Major	4.6.5	18/14/2014	Closed 31/01/2015
1366665M1	Major		09/08/2016	Closed on 16/08/2016
1366665N1	Minor		09/08/2016	Closed on 16/08/2016. Further verify during next surveillance and closed on 25/01/2017
1426259-201701-M1	Major	6.5.1	25/01/2017	Closed on 02/03/2017
1579822-201801-M1	Major	6.5.1	26/01/2018	Closed on 26/3/2018
1579822-201801-M2	Major	6.5.2	26/01/2018	Closed on 26/3/2018
1579822-201801-M3	Major	4.6.11	26/01/2018	Closed on 26/3/2018

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1579822-201801-M4	Major	4.7.2	26/01/2018	Closed on 26/3/2018
1579822-201801-N1	Minor	6.5.3	26/01/2018	Closed on 15/02/2019
1579822-201801-N2	Minor	4.7.3	26/01/2018	Closed on 15/02/2019
1579822-201801-N3	Minor	5.1.2	26/01/2018	Closed on 15/02/2019
1740419-201902-M1	Major	6.1.3	15/02/2019	Closed on 24/4/2019
1740419-201902-M2	Major	2.1.1	15/02/2019	Closed on 24/4/2019
1740419-201902-N1	Minor	4.6.10	15/02/2019	"Open"
1740419-201902-N2	Minor	2.1.3	15/02/2019	"Open"

**3.5. Stakeholders Consultation**

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Genting Ayer Item 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.

<b>List of Stakeholders Contacted</b>	
<p><b>Internal Stakeholders</b></p> <p>Local workers representative</p> <p>Foreign workers representative</p> <p>Women workers representative</p> <p>Mill workers</p> <p>Harvesters</p> <p>Sprayers</p> <p>Mandores</p>	<p><b>Union/Contractors/Local Communities</b></p> <p>Kg. Melayu Bukit Batu representative</p> <p>Kg. Seri Bengkal representative</p> <p>Kg. Parit Ismail 6 representative</p> <p>Neighbouring smallholders</p> <p>Cattle owners</p> <p>Contractors</p> <p>Suppliers</p> <p>Transporters</p>
<p><b>Government Departments</b></p> <p>Headmaster, SJKT Ladang Kulai Besar</p>	<p><b>NGO</b></p> <p>Nil</p>

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IS #	Description
1	<p><b>Feedbacks:</b>            Local village representatives – good relationship with management from estates and mill. Concern on road conditions due to vehicle movements communicated to management always responded promptly either by providing water bowser during dry season to control dust or providing machine and materials for road maintenance.</p>
	<p><b>Management Responses:</b>            Complaints regarding road conditions were always taken action immediately. On top of that, estate have its own road maintenance program which implemented from time to time.</p>
	<p><b>Audit Team Findings:</b>            No further issue.</p>
2	<p><b>Feedbacks:</b>            Women workers representative – good involvement of all women employee including male employee’s spouse in gender committee activities with good support by mill and estate management.</p>
	<p><b>Management Responses:</b>            Positive comment noted.</p>
	<p><b>Audit Team Findings:</b>            No further issue.</p>
3	<p><b>Feedbacks:</b>            Vendors &amp; contractors – long service to Genting Plantation since more than the past 10 years. No issue in pricing and payment.</p>
	<p><b>Management Responses:</b>            Positive comment noted.</p>
	<p><b>Audit Team Findings:</b>            No further issue.</p>
4	<p><b>Feedbacks:</b>            SJKT Ladang Kulai Besar Headmaster– attended the previous stakeholder meeting and satisfied with info provided.</p>
	<p><b>Management Responses:</b>            All relevant stakeholder will be invited in the periodical stakeholder meeting conducted to share the sustainability info and discuss any issues.</p>
	<p><b>Audit Team Findings:</b>            To cross reference to stakeholder meeting minutes.</p>
5	<p><b>Feedbacks:</b>            Cattle owners – no issue with estate. Allowed to rear cattle with condition not to release in replanting area.</p>
	<p><b>Management Responses:</b>            Management always concern on the cattle within estate issues. However owners gave good cooperation when being told not to encroach replanting area.</p>
	<p><b>Audit Team Findings:</b>            No further issue.</p>
6	<p><b>Feedbacks:</b>            Local &amp; Foreign Workers – no issue in provision of housing and accommodation. PPE always provided by management. Contract agreements terms and conditions were fully explained by management.</p>
	<p><b>Management Responses:</b>            Workers conditions are always priority to management.</p>
	<p><b>Audit Team Findings:</b>            All feedbacks from workers were used as the input to the checklist.</p>

<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Genting Ayer Item Oil Mill has complied with the RSPO P&amp;C MY-NI 2014 &amp; RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Genting Ayer Item Oil Mill is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> Hafriazhar Mohd Mokhtar	<b>Name:</b> Arunan Kandasamy
<b>Company Name:</b> BSI Services Malaysia Sdn Bhd	<b>Company Name:</b> Genting Plantations Berhad
<b>Title:</b> Lead Auditor	<b>Title:</b> SVP Plantation (Malaysia)
<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>Date:</b> 10 June 2019	<b>Date:</b> 17 JUNE 2019

**Appendix A: Summary of Findings**

Criterion / Indicator		Assessment Findings	Compliance
<b>Principle 1: Commitment to Transparency</b>			
<b>Criterion 1.1:</b> Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Genting Plantations Berhad has issued a list of documents that could be accessed by stakeholders during stakeholder meeting. The list of documents that could be accessed include all policies, SEIA report and the management plan, complaint & grievances procedure.  Interviews with the stakeholders such as contractor, local communities and internal workers confirmed that they are aware of it and understood that they have the rights to participate in the decision making.	Complied



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Criterion / Indicator		Assessment Findings	Compliance
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	<p>Genting Plantations Berhad continued to maintain records of information request and response as per Procedures on Information Request and Responses, Doc. No. SMP-GPB-25, Rev. 0 dated 14/8/2014. Requests for information were recorded in the Enquiry Register Book and attended promptly. Sighting of records confirmed prompt response to stakeholders.</p> <p>In 2019, there were two requests by external stakeholders at Genting Sungei Rayat Estate, that is, (1) Villagers of Parit Sehad off Parit Yaani invited GSRE for Community Social Work to be held 11.1.2019 and requested for donation. Approval of RM200 worth of material was granted by General Manager on 7.1.2019. (2) Chinese Primary School York Chai, Parit Yaani, Batu Pahat requested 100 units Decorative Flower Plants on 12.2.2019. Estate Manager had directed Chief Clerk to prepare and get ready the seedlings, which at the time of audit, was underway.</p>	Complied
<p><b>Criterion 1.2:</b>            Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p>			

Criterion / Indicator	Assessment Findings	Compliance
1.2.1 Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none"> <li>• Land titles/user rights (Criterion 2.2);</li> <li>• Occupational health and safety plans (Criterion 4.7);</li> <li>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</li> <li>• HCV documentation (Criteria 5.2 and 7.3);</li> <li>• Pollution prevention and reduction plans (Criterion 5.6);</li> <li>• Details of complaints and grievances (Criterion 6.3);</li> <li>• Negotiation procedures (Criterion 6.4);</li> <li>• Continual improvement plans (Criterion 8.1);</li> <li>• Public summary of certification assessment report;</li> <li>• Human Rights Policy (Criterion 6.13).</li> </ul> - Major compliance –	<p>All documents required by this indicator are made publicly available to all stakeholders. Genting Plantations Berhad require them to fill in the Enquiry Register Book in order to access the documents. The Corporate Department will ensure that the requested documents made available do not impinge on confidentiality and will not cause detrimental sustainability or negative social outcomes.</p> <p>Sustainability Report and Annual Report are published annually and made publicly available at website: <a href="http://www.gentingplantations.com">www.gentingplantations.com</a>.</p> <p>In addition to the website, the policies were also seen displayed at various locations at the operating units including the main notice boards of the estates and mill offices notice boards for employees and visitors to view.</p>	<p>Complied</p>
<b>Criteria 1.3:</b> Growers and millers commit to ethical conduct in all business operations and transactions.		

Criterion / Indicator		Assessment Findings	Compliance
1.3.1	<p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>	<p>Genting Plantations Berhad has developed Ethical Conduct and Integrity Policy dated 22/6/2015. The company is committed to conduct its business ethically and with integrity at all times. The following values need to be followed by all the employees:</p> <ul style="list-style-type: none"> <li>i. Respect for fair conduct of business</li> <li>ii. Refrain from all forms of corruption, bribery and fraudulent use of funds and resources</li> <li>iii. Respect and protect confidential and/ or privileged information to which we have access in the course of our duties</li> </ul> <p>All the contractors and workers have been briefed on the policy during induction training once arrived to the mill. Seen the Induction Book and sighted the contractors. Visitors and new recruited workers have attended the induction training.</p>	Complied
<b>Principle 2: Compliance with applicable laws and regulations</b>			
<b>Criterion 2.1:</b>			
There is compliance with all applicable local, national and ratified international laws and regulations.			

<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available.          - Major compliance -</p>	<p>Genting Ayer Item CU continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating unit and SD sustainability team. The CU had obtained and renewed their license and permits as required by the law. The following were sampled:</p> <p><u>Genting Ayer Item Palm Oil Mill</u></p> <ol style="list-style-type: none"> <li>The mill operates under MPOB license no 5000-567-0400 issued for period of 01/2/19-31/1/20. The license provides therein;             <ul style="list-style-type: none"> <li>entitlement of <i>menjual and mengalih FFB</i></li> <li>the total processed allowed is <i>192000</i> mt.</li> </ul>             Found that the total FFB processed in the entire year 2018, (1/2/18 – 31/1/19) was <i>196358.23</i> mt, <b>exceeding 4358.23</b> mt, equivalent to 2.27 % of the approved quantity. <b>Hence an NCR AB 01-19 was raised.</b> </li> <li>DOE License (Jadual Pematuhan) EQA 1974 (Certificate No. 002156 valid from 26/06/2018 – 30/06/2019)</li> <li>DOE Schedule Waste Contractor (Southern Strength Sdn Bhd) License (004769 validity period from 01/05/2018 – 30/04/2019)</li> <li>River water extraction registration (BAKAJ) (08/A/Klg/034 validity period 26.1.2018 to 31/12/2019).</li> <li>Private Electrical Installation Registration No. 2018/01830, Certificate No. valid from 12/06/2018 – 11/06/2019).</li> <li>Diesel (Euro 2M) license J 034192, ref (15) PPDNKK/J/BP/PBK 0069 for 18,200 liter dated 06/12/2018 until 05/12/2019.</li> <li> <p><u>Equipment and Machineries Permit</u></p> <table border="1" data-bbox="1025 1233 1785 1398"> <thead> <tr> <th rowspan="2">Description</th> <th rowspan="2">Registration No.</th> <th colspan="2">Validity Date</th> </tr> <tr> <th>Start</th> <th>Expiry</th> </tr> </thead> <tbody> <tr> <td>Boiler No. 3</td> <td>JH PMD 965</td> <td>11.4.2018</td> <td>10.7.2019</td> </tr> <tr> <td>Steam Receiver</td> <td>PMT 27600</td> <td>11.4.2018</td> <td>10.7.2019</td> </tr> </tbody> </table> </li> </ol>	Description	Registration No.	Validity Date		Start	Expiry	Boiler No. 3	JH PMD 965	11.4.2018	10.7.2019	Steam Receiver	PMT 27600	11.4.2018	10.7.2019	<p>Major nonconformance</p>
Description	Registration No.	Validity Date															
		Start	Expiry														
Boiler No. 3	JH PMD 965	11.4.2018	10.7.2019														
Steam Receiver	PMT 27600	11.4.2018	10.7.2019														

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		<table border="1"> <tr> <td>Sterilizer No.1</td> <td>PMT 47883</td> <td>10.7.2019</td> <td>10.7.2019</td> </tr> <tr> <td>Air Compressor No.3</td> <td>JH PMT 15029</td> <td>10.7.2019</td> <td>10.7.2019</td> </tr> <tr> <td>Overhead Crane No. 1</td> <td>PMA 7088</td> <td>10.7.2019</td> <td>10.7.2019</td> </tr> </table>	Sterilizer No.1	PMT 47883	10.7.2019	10.7.2019	Air Compressor No.3	JH PMT 15029	10.7.2019	10.7.2019	Overhead Crane No. 1	PMA 7088	10.7.2019	10.7.2019		<p><u>Competence persons:</u></p> <ol style="list-style-type: none"> <li>1 Steam engineer: 1 x 2<sup>nd</sup> grade: Reg. No. 182/2015</li> <li>2 Steam engine and steam boilerman certificate: 6 – 3x Grade 1 and 3x Grade 2 respectively</li> <li>3 Visiting Electrical Engineer: JK-T-5-B-0144-1995, Certificate No. 0012362</li> <li>4 AESP 4 Nos. 1 no. expire on 5.9.2019, 3 nos. expire on 19.9.2019</li> <li>5 AGT 1 No. valid from 27.9.2017 to 27.9/2019</li> <li>6 First Aiders: 14 Nos. Validity period 28.11.2017 to 27.11.2019 for all certificate holders.</li> </ol> <p><u>Kulai Besar Estate</u></p> <ol style="list-style-type: none"> <li>1 MPOB License for Selling and Moving FFB (508591102000 validity from 01/05/2018 – 30/04/2019).</li> <li>2 Fuel storage license for 10,000 litter diesel and 400 litter Petrol (J039103 validity from 2/09/2018 – 01/09/2019).</li> <li>3 Air Receiver JH PMT 22240 validity 19/07/2017 – 10/10/2019</li> <li>4 Weighbridge license 50 tons, (Safety Seal Q005640 2.1k validity from 27/03/2018 - 2 6 /03/2019)</li> <li>5 Clinical Waste Disposal licensed Contractor: Kualiti Alam Sdn Bhd, Licence No. Contractor Code: 50/013/904/003</li> </ol> <p><u>Sungei Rayat Estate:</u></p> <ol style="list-style-type: none"> <li>1. MPOB License for Selling and Moving FFB (508590202000 validity from 01/05/2018 – 30/04/2019).</li> </ol>	
Sterilizer No.1	PMT 47883	10.7.2019	10.7.2019														
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Criterion / Indicator	Assessment Findings	Compliance
	<ol style="list-style-type: none"> <li>2. Fuel storage Permit for 10,000 liter diesel (Euro 2) Ref. No. (61) PPDNKK/J/BP/PBK 0048, valid from 15.11.2018 to 14.11.2019 and 100 liter/day Petrol (Subsidy for Agriculture use) Ref. No. KPDNKK/J/BP 086/2018 PK valid from 17/12/2018 – 16/12/2019).</li> <li>3. Air Receiver JH PMT 14835 validity 30/09/2018 – 25/12/2019</li> <li>4. Weighbridge license 50 tons, (Safety Seal Q009652 2.1k validity from 13/12/2018 - 12/12/2019)</li> <li>5. Estate Hospital Assistant Grade 1, Registration No.: Q1742 dated 29.04.1994.</li> </ol> <p><u>Tebong Estate:</u></p> <ol style="list-style-type: none"> <li>1. MPOB License for Selling and Moving FFB (501803202000 validity from 01/12/2018 – 30/11/2019).</li> <li>2. Fuel storage Permit for 10,000 liter diesel Ref. No. SK (M) 382/2003(D), valid from 07.05.2018 to 06.05.2019</li> <li>3. Air Receiver MK PMT 54455 validity 1/11/2018 – 21/06/2019</li> <li>4. Weighbridge license 60 tons, (Safety Seal 30109 1.9k validity from 2/10/2018 - 1/10/2019)</li> <li>5. Licence to Possess Firearms and ammunition AG 1733 valid to 5.7.2019)</li> </ol>	

Criterion / Indicator		Assessment Findings	Compliance
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	<p>The list of legal requirement has been identified and documented in the Legal Register. The legal register was last reviewed on 23.1.2019. It is done annually as required by the Sustainability Management Procedure Manual, Doc.: SMP-GPB-22 Rev.06. The person responsible to ensure the legal register is updated is the GPB Sustainability team.</p> <p>However, at Genting Ayer Item Oil Mill, the responsibility to update legal requirements related to environment, health and safety rests with the Mill Manager and the office clerk.</p>	Complied
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	<p>The responsible personnel to ensure compliance on the legal requirement is the respective Operating Unit Manager and is monitored by the Sustainability team through internal audit.</p> <p>The evaluation of compliance is also a requirement in the above mentioned Sustainability Management Procedure Manual. The compliance was last evaluated on 31.1.2019.</p> <p>However, the requirement of an A4 Electrical Chargeman Competent Person (at Mill) was not made available and addressed as per Electricity Supply Act 1990. <b>Hence, an NCR MM1 was raised.</b></p>	Minor nonconformance

Criterion / Indicator		Assessment Findings	Compliance
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	The system to track changes in law is implemented through the head office Sustainability Team. They are responsible for tracking and ensuring that all legal requirements applicable to Operating Units have been identified and for evaluating their potential impact on the company's operations.  Means of tracking and identifying include the respective authority website visits and direct communication with those agencies.	Complied
<b>Criterion 2.2:</b> The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.			



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Criterion / Indicator	Assessment Findings	Compliance
<p>2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available.                      - Major compliance -</p>	<p>Documents showing legal ownership available as following:                      A) Genting Kulai Besar Estate                      Total = 33 titles                      Total area as per Hectarage (Area) Statement 6/2/19 = 1,691.04 ha.                      Sample titles:                      1. Title # HSD 33928; Lot # PTD 47442; Area: 82.55 Ha                      2. Title # 342169; Lot # 58773; Area: 43.2 Ha                      3. Title # 342191; Lot # 58774; Area: 19.73 Ha                      4. Title # HSD 33967; Lot # PTD 47445; Area: 50.57 Ha                       B) Genting Sungei Rayat Estate                      Total = 31 titles                      Total area as per Hectarage (Area) Statement January 2019 = 2,378.98 ha. Sample titles:                      1. Title # 96424; Lot # 227 &amp; 228; Area: 446.3676 Ha &amp; 229.8611 Ha                      2. Title # 122344; Lot # 5107; Area: 5.8806 Ha                      3. Title # 122398; Lot # 5084; Area: 39.9374 Ha                      4. Title # 132010; Lot # 5106; Area: 17.8567 Ha                       C) Genting Tebong Estate                      Total = 22 titles                      Total area as per Hectarage (Area) Statement January 2019 = 2,217.26 ha. Sample titles:                      1. Title # 9075; Lot # 67; Area: 225.2061 Ha                      2. Title # 11866; Lot # 1176; Area: 22.17 Ha                      3. Title # 11867; Lot # 1177; Area: 65.96 Ha                      4. Title # 9073; Lot # 1; Area: 102.5321 Ha</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance												
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	<p>All the audited units have boundary stone/markers adjacent to forest reserves/neighbouring properties. This is indicated in "GPS Surveyed Map" and verified at site. The areas visited are as follows;</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Boundary details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>GKBE</td> <td>OP2009A – Gunung Pulai Reserves</td> </tr> <tr> <td>2</td> <td>GSRE</td> <td>OP2018D – Small holders – Koh B L</td> </tr> <tr> <td>3</td> <td>GTE</td> <td>OP96SK – Kg Asli – stone no JU 1</td> </tr> </tbody> </table> <p>Fencing parameters are established around the mill building complex to separate the management boundary of estate and the mill. The housing and other recreational facilities are also maintained separately under different management of the host estate and the mill.</p>		Estate	Boundary details	1	GKBE	OP2009A – Gunung Pulai Reserves	2	GSRE	OP2018D – Small holders – Koh B L	3	GTE	OP96SK – Kg Asli – stone no JU 1	Complied
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Criterion / Indicator	Assessment Findings	Compliance
<p>2.2.3</p> <p>Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC).                      - Minor compliance -</p>	<p>There is no land dispute in the GKBE and GTBE at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations Berhad and land ownership documents verified.</p> <p>Recently, there was a hand-over of land to smallholder whom had complained on 13/11/2018 (Complaints/Grievances Record Book Complaint Ref. # 148) when the he found that the estate had overplanted the oil palm tree during replanting of the area in OP1987G (OP2018D). Upon received of complaint, GSRE immediately conducted re-survey by GPRC team on the same day and the management found a total of 10 replanted palms had encroached into complainant's area.</p> <p>This was confirmed and agreed by complainants and GSRE took action by surrender back the land together with 10 replanted palm trees to the smallholder upon mutual agreement by both parties as per records of complaint. The issue was reported by the Estate Manager and noted by the General Manager. No further issue raise after that.</p>	<p>Complied</p>
<p>2.2.4</p> <p>There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved.                      -Major compliance</p>	<p>In case of any, to be handle as per Procedure on Conflict Resolution and Handling of Negotiations and Compensations Within GENP Estates; Doc. # SMP-GPB-18; Rev. # 03; Issue date: 29/12/2017.</p>	<p>Complied</p>

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2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	<p>There is no land dispute in the GKBE and GTBE at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations Berhad and land ownership documents verified.</p> <p>Recently, there was a hand-over of land to smallholder whom had complained on 13/11/2018 (Complaints/Grievances Record Book Complaint Ref. # 148) when the he found that the estate had overplanted the oil palm tree during replanting of the area in OP1987G (OP2018D). Upon received of complaint, GSRE immediately conducted re-survey by GPRC team on the same day and the management found a total of 10 replanted palms had encroached into complainant's area.</p> <p>This was confirmed and agreed by complainants and GSRE took action by surrender back the land together with 10 replanted palm trees to the smallholder upon mutual agreement by both parties as per records of complaint. The issue was reported by the Estate Manager and noted by the General Manager. No further issue raise after that.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	<p>There is no land dispute in the GKBE and GTBE at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations Berhad and land ownership documents verified.</p> <p>Recently, there was a hand-over of land to smallholder whom had complained on 13/11/2018 (Complaints/Grievances Record Book Complaint Ref. # 148) when the he found that the estate had overplanted the oil palm tree during replanting of the area in OP1987G (OP2018D). Upon received of complaint, GSRE immediately conducted re-survey by GPRC team on the same day and the management found a total of 10 replanted palms had encroached into complainant's area.</p> <p>This was confirmed and agreed by complainants and GSRE took action by surrender back the land together with 10 replanted palm trees to the smallholder upon mutual agreement by both parties as per records of complaint. The issue was reported by the Estate Manager and noted by the General Manager. No further issue raise after that.</p>	Complied
<p><b>Criterion 2.3:</b>            Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.</p>			

Criterion / Indicator	Assessment Findings	Compliance
<p>2.3.1</p>	<p>Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).                      - Major compliance -</p> <p>In case of any, to be handle as per Procedure on Conflict Resolution and Handling of Negotiations and Compensations Within GENP Estates; Doc. # SMP-GPB-18; Rev. # 03; Issue date: 29/12/2017.</p> <p>There is no land dispute in the GKBE and GTBE at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations Berhad and land ownership documents verified.</p> <p>Recently, there was a hand-over of land to smallholder whom had complained on 13/11/2018 (Complaints/Grievances Record Book Complaint Ref. # 148) when the he found that the estate had overplanted the oil palm tree during replanting of the area in OP1987G (OP2018D). Upon received of complaint, GSRE immediately conducted re-survey by GPRC team on the same day and the management found a total of 10 replanted palms had encroached into complainant's area.</p> <p>This was confirmed and agreed by complainants and GSRE took action by surrender back the land together with 10 replanted palm trees to the smallholder upon mutual agreement by both parties as per records of complaint. The issue was reported by the Estate Manager and noted by the General Manager. No further issue raise after that.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>2.3.2 Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include:</p> <p>a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making;</p> <p>b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken;</p> <p>c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	<p>The estate lands are legally owned by the company. The existing estates are not encumbered by any customary land rights. There is no land dispute in the GKBE and GTBE at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations Berhad and land ownership documents verified.</p> <p>Recently, there was a hand-over of land to smallholder whom had complained on 13/11/2018 (Complaints/Grievances Record Book Complaint Ref. # 148) when the he found that the estate had overplanted the oil palm tree during replanting of the area in OP1987G (OP2018D). Upon received of complaint, GSRE immediately conducted re-survey by GPRC team on the same day and the management found a total of 10 replanted palms had encroached into complainant's area.</p> <p>This was confirmed and agreed by complainants and GSRE took action by surrender back the land together with 10 replanted palm trees to the smallholder upon mutual agreement by both parties as per records of complaint. The issue was reported by the Estate Manager and noted by the General Manager. No further issue raise after that.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>2.3.3</p>	<p>All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.                      -Minor compliance</p> <p>The estate lands are legally owned by the company. The existing estates are not encumbered by any customary land rights. There is no land dispute in the GKBE and GTBE at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations Berhad and land ownership documents verified.</p> <p>Recently, there was a hand-over of land to smallholder whom had complained on 13/11/2018 (Complaints/Grievances Record Book Complaint Ref. # 148) when the he found that the estate had overplanted the oil palm tree during replanting of the area in OP1987G (OP2018D). Upon received of complaint, GSRE immediately conducted re-survey by GPRC team on the same day and the management found a total of 10 replanted palms had encroached into complainant's area.</p> <p>This was confirmed and agreed by complainants and GSRE took action by surrender back the land together with 10 replanted palm trees to the smallholder upon mutual agreement by both parties as per records of complaint. The issue was reported by the Estate Manager and noted by the General Manager. No further issue raise after that.</p>	<p>Complied</p>



Criterion / Indicator		Assessment Findings	Compliance
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	<p>The estate lands are legally owned by the company. The existing estates are not encumbered by any customary land rights. There is no land dispute in the GKBE and GTBE at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations Berhad and land ownership documents verified.</p> <p>Recently, there was a hand-over of land to smallholder whom had complained on 13/11/2018 (Complaints/Grievances Record Book Complaint Ref. # 148) when the he found that the estate had overplanted the oil palm tree during replanting of the area in OP1987G (OP2018D). Upon received of complaint, GSRE immediately conducted re-survey by GPRC team on the same day and the management found a total of 10 replanted palms had encroached into complainant's area.</p> <p>This was confirmed and agreed by complainants and GSRE took action by surrender back the land together with 10 replanted palm trees to the smallholder upon mutual agreement by both parties as per records of complaint. The issue was reported by the Estate Manager and noted by the General Manager. No further issue raise after that.</p>	Complied
<p><b>Principle 3: Commitment to long-term economic and financial viability</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>			

Criterion / Indicator	Assessment Findings	Compliance
<p>3.1.1</p> <p>A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders.</p> <p>- Major compliance -</p>	<p>The CU has established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. Budget and 5 years management plan (projections 2019 - 2023) was verified during the audit. Sample at the CU as shown below.</p> <p><u>Genting Ayer Item Oil Mill</u></p> <ol style="list-style-type: none"> <li>1. Fire Protection and Fighting Facilities</li> <li>2. New 45t boiler</li> <li>3. Roof replacement and upgrading</li> </ol> <p><u>Genting Kulai Besar Estate</u></p> <ul style="list-style-type: none"> <li>• Buildings – Residential and others</li> <li>• New Mechanised Loose Fruit Collector</li> <li>• Road and Bridges</li> </ul> <p><u>Genting Sungei Rayat Estate</u></p> <ul style="list-style-type: none"> <li>• Buildings – Residential and others</li> <li>• Plant and Machinery</li> <li>• Road and Bridges</li> <li>• Office equipment</li> </ul> <p><u>Genting Tebong Estate</u></p> <ul style="list-style-type: none"> <li>• New Tipping Trailer</li> <li>• New MIDI Tractor</li> <li>• Irrigation Project 40 ha</li> <li>• Construction of Tractor Parking Bay</li> </ul>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance																														
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	<p>The replanting programs for the three estates are compiled as follows. The program is reviewable on an annual basis which is subject to amendment. All figures in hectares otherwise stated.</p> <table border="1"> <thead> <tr> <th>No</th> <th>Year</th> <th>GKBE</th> <th>GSR</th> <th>GTE</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2019</td> <td>127.46</td> <td>119.24</td> <td>129.52</td> </tr> <tr> <td>2</td> <td>2020</td> <td>136.31</td> <td>71.73</td> <td>127.79</td> </tr> <tr> <td>3</td> <td>2021</td> <td>172.39</td> <td>0</td> <td>263.97</td> </tr> <tr> <td>4</td> <td>2022</td> <td>177.74</td> <td>33.84</td> <td>30.17</td> </tr> <tr> <td>5</td> <td>2023</td> <td>108.55</td> <td>66.71</td> <td>103.33</td> </tr> </tbody> </table>	No	Year	GKBE	GSR	GTE	1	2019	127.46	119.24	129.52	2	2020	136.31	71.73	127.79	3	2021	172.39	0	263.97	4	2022	177.74	33.84	30.17	5	2023	108.55	66.71	103.33	Complied
No	Year	GKBE	GSR	GTE																													
1	2019	127.46	119.24	129.52																													
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<b>Principle 4: Use of appropriate best practices by growers and millers</b>																																	
<b>Criterion 4.1:</b> Operating procedures are appropriately documented, consistently implemented and monitored.																																	

Criterion / Indicator		Assessment Findings	Compliance
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	<p>The GAIOM has documented and maintained its own operational procedure covering all work stations from FFB Reception to CPO Despatch and its supporting functions such as Laboratory, Workshop and Weighbridge. It is a three tier documentation level: Procedure Manual, System Procedure, Standard Operating Manual, Safe Operating Procedure and Environmental Control Procedure.</p> <p>On the estates front three sets of manual had been developed and used daily in their operations, namely:</p> <ul style="list-style-type: none"> <li>- Sustainability Management Procedure Manual enumerating 32 topics, latest update on 11/02/2019.</li> <li>- OSH Manual covers accident notification, PPE, health and safety programme, Emergency Response Plan, safety signages, OSH committee, HIRARC, and</li> <li>- Oil Palm Manual consisting of SOP describing activities at estate, example:               <ul style="list-style-type: none"> <li>OPM 1: Land clearing, preparation, planting and legume covers establishment</li> <li>OPM 2: Oil palm nursery practices</li> <li>OPM 3: Planting density and planting technique</li> <li>OPM 4: Soil conservation and terracing</li> <li>OPM 5: Pest and disease</li> <li>OPM 6: Weeding-weed management</li> <li>OPM 7: Manuring of oil palm</li> <li>OPM11: Harvesting</li> <li>OPM 13: Managing difficult soils</li> </ul> </li> </ul>	Complied

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4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	The mechanism to check consistent implementation for all activities carried out in the estate was through internal audit. Sighted the internal audit report at mill and estate visited as follows: Genting Kulai Besar Estate on 9/1/2019, Genting Sungei Rayat Estate on 11/1/2019 Genting Ayer Item Oil Mill on 14/1/2019 and Genting Tebong Estate on 22/1/2019.  Additionally, Assistant Managers and Mill/Field Supervisors of the respective Operating Unit during their mill or field rounds do ensure Safe Work Practices and Standard Operating Procedures are followed.	Complied
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	All records related to Internal Audit, Mill Inspector and Estate Inspector visit was maintained and available at Mill and Estate Office.	Complied
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	Genting Ayer Item Oil Mill only receive certified FFB from their own 5 supply bases. The records show the origin, weight, transporters details and volume of FFB received.  Interviewed the weighbridge officer and they well aware how to identify and receive from FFB from own estates.	Complied
<b>Criterion 4.2:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.2.1</p> <p>There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible.</p> <p>- Minor compliance -</p>	<p>The estates and mills are guided by the following manuals</p> <ul style="list-style-type: none"> <li>a) Genting Plantations Oil Palm Manual OPM issued on 9/11/99</li> <li>b) Sustainability Management Procedure Manual 1/8/13 revised in 7/2/19.</li> <li>c) OSH Manual dated 1/1/2010.</li> <li>d) Environmental Control Procedure – 01/9/2018</li> <li>e) Store Operating Manual – 2014</li> <li>f) Standard Operating Procedure West Malaysia Estates 17/1/2011.</li> <li>g) Jobs description - 2012</li> </ul> <p>The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections</p> <ul style="list-style-type: none"> <li>a) OPM No 7. Manuring of oil palm</li> <li>b) OPM no 13. Managing difficult soils</li> </ul>	<p>Complied</p>

<p>4.2.2</p>	<p>Records of fertiliser inputs shall be maintained. - Minor compliance -</p>	<p>Fertiliser application program was monitored using records among others as described below;</p> <ul style="list-style-type: none"> <li>a) program sheets, bin cards,</li> <li>b) Field cost book, fertiliser application monitoring forms, etc.</li> <li>c) Reconciliation of empty bags versus the issuance.</li> </ul> <p>Records of programs and applications of fertilisers were reviewed by auditors. Review of the records showed that the actual fertilisers applied in 2018 were in line with the program.</p> <table border="1" data-bbox="1032 687 1749 855"> <thead> <tr> <th colspan="5">Kulai Besar Estate</th> </tr> <tr> <th>1</th> <th>Field no</th> <th>Type</th> <th>Dosage</th> <th>Month</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>OP89A</td> <td>AC</td> <td>1.50</td> <td>Mac</td> </tr> <tr> <td>3</td> <td>OP92C</td> <td>MOP</td> <td>2.00</td> <td>April/Sept</td> </tr> <tr> <td>4</td> <td>OP91D</td> <td>AC</td> <td>1.50</td> <td>Mac/July</td> </tr> </tbody> </table> <table border="1" data-bbox="1032 922 1729 1222"> <thead> <tr> <th colspan="5">Sg Rayat Estate</th> </tr> <tr> <th>1</th> <th>Field no</th> <th>Type</th> <th>Dosage</th> <th>Month</th> </tr> </thead> <tbody> <tr> <td></td> <td>OP95A</td> <td>ERP</td> <td>1.25</td> <td>April</td> </tr> <tr> <td></td> <td></td> <td>NK Mix B</td> <td>2.25</td> <td>June</td> </tr> <tr> <td>2</td> <td>OP97</td> <td>ERP</td> <td>1.25</td> <td>April</td> </tr> <tr> <td></td> <td></td> <td>AC</td> <td>2.25</td> <td>June</td> </tr> <tr> <td></td> <td></td> <td>NK Mix B</td> <td>2.50</td> <td>Aug</td> </tr> </tbody> </table> <table border="1" data-bbox="1032 1289 1729 1385"> <thead> <tr> <th colspan="5">G Tebong Estate</th> </tr> <tr> <th></th> <th>Field no</th> <th>Type</th> <th>Dosage</th> <th>Month</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>OP94B</td> <td>ERP</td> <td>1.25</td> <td>Feb</td> </tr> </tbody> </table>	Kulai Besar Estate					1	Field no	Type	Dosage	Month	2	OP89A	AC	1.50	Mac	3	OP92C	MOP	2.00	April/Sept	4	OP91D	AC	1.50	Mac/July	Sg Rayat Estate					1	Field no	Type	Dosage	Month		OP95A	ERP	1.25	April			NK Mix B	2.25	June	2	OP97	ERP	1.25	April			AC	2.25	June			NK Mix B	2.50	Aug	G Tebong Estate						Field no	Type	Dosage	Month	1	OP94B	ERP	1.25	Feb	<p>Complied</p>
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**RSPO Public Summary Report**  
**Revision 7 (Aug /2018)**

Criterion / Indicator		Assessment Findings				Compliance
			AC	1.75	Mac /Aug	
			MOP	2.00	April/Sept	
		2	OP02B	AC	1.25	Mac/April
				MOP	2.00	April/sept
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	<p>Periodic tissue and soil sampling were carried out in the Estates CU to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. Soil samplings are made on a 5 year cycle to detect the following analysis.</p> <ul style="list-style-type: none"> <li>a) PH, Carbon</li> <li>b) Total N, P, K, Ca, Mg, Na</li> </ul> <p>GSRE conducted recent soil analysis on 16/10/18. GKBE was on 18-19/10/18 and GTE made on 10/1/18. The foliar analysis by Genting Research Plantations Centre were carried out to facilitate the 2019 fertilizer programme</p> <ul style="list-style-type: none"> <li>a) 14/3/18 for GKBE</li> <li>b) 16/10/18 for GSRE</li> <li>c) 10/1/18 for GTE.</li> </ul>				Complied



Criterion / Indicator		Assessment Findings	Compliance																
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	<p>The EFB application records are as follows. Effluent application was confined to <i>Genting Sg Rayat Estate</i> being the nearest to the effluent pond. Method of application through flat beds and furrows into field no OP1999.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>mt (entire 2018)</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kulai Besar</td> <td>9567.79</td> <td>428.59</td> </tr> <tr> <td>2</td> <td>Sg Rayat</td> <td>4960.16</td> <td>383.01</td> </tr> <tr> <td>3</td> <td>G Tebung</td> <td>5006</td> <td>288.0</td> </tr> </tbody> </table> <p>Guidelines for EFB application adopted by the estates: mature 25mt/ha. Immature at 20mt/ha.</p>		Estate	mt (entire 2018)	Ha	1	Kulai Besar	9567.79	428.59	2	Sg Rayat	4960.16	383.01	3	G Tebung	5006	288.0	Complied
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<p><b>Criterion 4.3:</b> Practices minimise and control erosion and degradation of soils.</p>																			

<p>4.3.1</p>	<p>Maps of any fragile soils shall be available. - Major compliance -</p>	<p>The soil series for the 3 estates comprises of the following. Soil maps are prepared by <i>Genting Research Centre</i>. Respective dates of map preparation was recorded;</p> <p>a) GKBE/GSRE maps were prepared in Sept 13. b) GTE soil map was established on 15/10/15</p> <table border="1" data-bbox="1043 555 1691 858"> <thead> <tr> <th colspan="3"><b>Kulai Besar Estate</b></th> </tr> <tr> <th></th> <th>Soil type</th> <th>ha</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Rengam Jerangau</td> <td>1177.84</td> </tr> <tr> <td>2</td> <td>Rengam Jerangau (N)</td> <td>11.6</td> </tr> <tr> <td>3</td> <td>Segamat Katong</td> <td>691.58</td> </tr> <tr> <td>4</td> <td>Serdang munchong</td> <td>4.46</td> </tr> <tr> <td>5</td> <td>Durian Melaka tavy</td> <td>574.51</td> </tr> <tr> <td>6</td> <td>Steep land</td> <td>2.62</td> </tr> <tr> <td>7</td> <td>Urban land</td> <td>1.26</td> </tr> </tbody> </table> <table border="1" data-bbox="1043 890 1691 1295"> <thead> <tr> <th colspan="3"><b>Sg Rayat Estate</b></th> </tr> <tr> <th></th> <th>Soil type</th> <th>ha</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Serdang bungor munchong</td> <td>184.41</td> </tr> <tr> <td>2</td> <td>Upland</td> <td>215.43</td> </tr> <tr> <td>3</td> <td>Hilly land</td> <td>90.98</td> </tr> <tr> <td><b>4</b></td> <td><b>Peat</b></td> <td><b>338.75</b></td> </tr> <tr> <td>5</td> <td>Rasau</td> <td>213.72</td> </tr> <tr> <td>6</td> <td>Pelepah</td> <td>224.12</td> </tr> <tr> <td>7</td> <td>Sedu-parit botak -linau</td> <td>688.69</td> </tr> <tr> <td>8</td> <td>Briah-sedu</td> <td>172.04</td> </tr> <tr> <td>9</td> <td>Briah</td> <td>219.87</td> </tr> </tbody> </table> <table border="1" data-bbox="1043 1327 1691 1393"> <thead> <tr> <th colspan="3"><b>Genting Tebong Estate</b></th> </tr> <tr> <th></th> <th>Soil type</th> <th>ha</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	<b>Kulai Besar Estate</b>				Soil type	ha	1	Rengam Jerangau	1177.84	2	Rengam Jerangau (N)	11.6	3	Segamat Katong	691.58	4	Serdang munchong	4.46	5	Durian Melaka tavy	574.51	6	Steep land	2.62	7	Urban land	1.26	<b>Sg Rayat Estate</b>				Soil type	ha	1	Serdang bungor munchong	184.41	2	Upland	215.43	3	Hilly land	90.98	<b>4</b>	<b>Peat</b>	<b>338.75</b>	5	Rasau	213.72	6	Pelepah	224.12	7	Sedu-parit botak -linau	688.69	8	Briah-sedu	172.04	9	Briah	219.87	<b>Genting Tebong Estate</b>				Soil type	ha				<p>Complied</p>
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		1	Rengam jerangau 967.26	967.26	
		2	Malacca durian	25.42	
		3	Bungor Tavy	164.35	
		4	Rengam Bkt Temiang	507.94	
		5	Bkt Temiang 94.41	94.41	
		6	Alluvium/colluviums 386.05	386.05	
		7	Telemong Akob 11.48	11.48	
		8	Serdang bungor	121.18	
		9	Steepland	0.77	
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	All the three estates had also implemented prevention of soil erosion measures such as construction of moisture conservation pits (MCP) in steep slope areas. Cover crops were observed to be in place as the CU management had generally encouraged the establishment of soft growth. Visits to the site found that significant areas of the ground were covered with <i>Neprolepis biserrata</i> . Most slopes had well established <i>Mucuna.bracteata</i>			Complied

Criterion / Indicator		Assessment Findings	Compliance
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	<p>During the field visit, it was observed that the main and field roads of CU were in satisfactory condition and accessibility was made possible by regular maintenance. There was evidence of road maintenance programmes which consist of the following works</p> <ul style="list-style-type: none"> <li>a) road resurfacing with grading &amp; compaction</li> <li>b) culvert maintenance,</li> <li>c) Road side pruning.</li> <li>d) Planting of <i>Guatemala /vertivar</i> grasses</li> </ul> <p>Work schedule were staggered into various fields and months. Concentration of timing is targeted in Jan – May avoiding the monsoon months. Program for GKBE, GTE and GSRE for the road maintenance was sighted. Duration of work stretched from Jan – Dec priority wok to be carried out during the dry months.</p>	Complied

<p>4.3.4</p>	<p>Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -</p>	<p>GSRE had an area of <b>338.75</b> ha of peat soil. This is witnessed in the soil map and site visit in field no OP1998A. The following monitoring/management was observed;</p> <p>a) Point of measuring the subsidence taken annually at 3 points in the estate peat area. Records shown below.</p> <table border="1" data-bbox="1032 555 1559 724"> <thead> <tr> <th></th> <th>Date/year</th> <th>OP98</th> <th>OP95</th> <th>OP08A</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>5/10/16</td> <td>8.2</td> <td>3.3</td> <td>3.4</td> </tr> <tr> <td>2</td> <td>5/10/17</td> <td>0</td> <td>0</td> <td>1.5</td> </tr> <tr> <td>3</td> <td>5/10/18</td> <td>0</td> <td>0</td> <td>1.5</td> </tr> </tbody> </table> <p>b) Ground water management Colour coding being used in the stick measurement to indicate the marking level (severity) of water level.</p> <table border="1" data-bbox="1032 853 1559 1023"> <thead> <tr> <th></th> <th>Colour code</th> <th>Depth range - soil surface</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Yellow</td> <td>0-50</td> </tr> <tr> <td>2</td> <td>Green</td> <td>51-75</td> </tr> <tr> <td>3</td> <td>red</td> <td>76-150</td> </tr> </tbody> </table> <p>The records made in Jan 2019 as shown below;</p> <table border="1" data-bbox="1032 1088 1559 1289"> <thead> <tr> <th></th> <th>Field no</th> <th>7/1</th> <th>14/1</th> <th>21/1</th> <th>28/1</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>08A</td> <td>27</td> <td>28</td> <td>24</td> <td>38</td> </tr> <tr> <td>2</td> <td>95/1</td> <td>15</td> <td>16</td> <td>10</td> <td>13</td> </tr> <tr> <td>3</td> <td>17B</td> <td>81</td> <td>85</td> <td>53</td> <td>59</td> </tr> <tr> <td>4</td> <td>08A</td> <td>62</td> <td>63</td> <td>38</td> <td>57</td> </tr> </tbody> </table>		Date/year	OP98	OP95	OP08A	1	5/10/16	8.2	3.3	3.4	2	5/10/17	0	0	1.5	3	5/10/18	0	0	1.5		Colour code	Depth range - soil surface	1	Yellow	0-50	2	Green	51-75	3	red	76-150		Field no	7/1	14/1	21/1	28/1	1	08A	27	28	24	38	2	95/1	15	16	10	13	3	17B	81	85	53	59	4	08A	62	63	38	57	<p>Complied</p>
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4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	The <i>Sg Rayat Estate Sing Mah Div</i> assessment on the peat drain ability was conducted on 31/1/19 by GPRC Senior Assist Manager – Agronomy which is aimed to study the; a) drain ability of peat soil b) historical yield record c) viability of planting oil palm in peat area  The conclusion made therein; a) The peat drain ability is in place b) The practices in ground had alleviated and managed well the water table and drain ability. c) The YPH performance provides evident that with proper practices cultivating palm in peat as GSRE had proven to be viable.	Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	This is in practice as the fertiliser application for the peat areas was formulated during the Agronomist visits. Included in the initiatives are the water management efforts and the subsidence level monitoring.	Complied
<b>Criterion 4.4:</b> Practices maintain the quality and availability of surface and ground water.			

<p>4.4.1</p>	<p>An implemented water management plan shall be in place. - Minor compliance -</p>	<p>The CU had its Water Management Plan for year 2019 which was developed in order to maintain the quality and availability of natural water resources by practicing efficient water consumption through various methods such as</p> <ul style="list-style-type: none"> <li>a) implementation of rain water harvest, construction of water gate for effective management of collection/main drain,</li> <li>b) establishment of <i>mucuna bracteata</i> to prevent erosion, side drain at field road to control water, frond stacking,</li> <li>c) Enhancement of ground vegetation at bare ground area.</li> </ul> <p>All estates received supply of piped treated water from the local state authorities for the domestic consumption. In view of non severity there was no rain harvest being practiced in the estates/mill. The general use of compound upkeep being initiated from the nearby water catchment. Water from triple rinsing of pesticide containers was reused for spraying. Records of rainfall data to assist in the water management plans were sighted from 2008.</p> <p>The estates adopted the following management plan in relation to water management. Last review was in Sept 18 for the estates.</p> <table border="1" data-bbox="1028 1038 1803 1375"> <thead> <tr> <th></th> <th>Key Areas</th> <th>Area of concern</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water source</td> <td>Government treated water Catchment pond</td> </tr> <tr> <td>2</td> <td>Efficient use of water</td> <td>Monitoring of pipe leakages Spraying pump maintenance Education and training</td> </tr> <tr> <td>3</td> <td>Renewable water source</td> <td>Monitoring of rainfall data Rain water captured at catchment pond</td> </tr> <tr> <td>4</td> <td>Water pollution</td> <td>Chemical mixing bay</td> </tr> </tbody> </table>		Key Areas	Area of concern	1	Water source	Government treated water Catchment pond	2	Efficient use of water	Monitoring of pipe leakages Spraying pump maintenance Education and training	3	Renewable water source	Monitoring of rainfall data Rain water captured at catchment pond	4	Water pollution	Chemical mixing bay	<p>Complied</p>
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		Workshop washing bay	
		Water sampling 2x/year	
5	Peat soil	Maintain water level	
		Drain management	
		Flushing and desilting	
		Maintain drain sizes as per size/specs	
		Annual desilting & de grassing of canals	
6	flood	Monitoring of rainfall data.	
		Desilting drain program	
<p>The mitigation and action plans for the key areas identified among others as shown below;</p>			
	Key Areas	Monitoring/Action Plan	
1	Water source	Nursery watering, tractor washing	
		Cleaning of compound	
2	Efficient use of water	Pipe leakages monitoring	
		Housing equipped with individual meter	
		Education / training conservation	
3	Renewable water source	Leakages to be reported and attended	
		Monitoring by management staff	
4	Water pollution	Drain system free flowing	
		Drainage repair given priority	
5	Peat soil	Maintain water level 50-75 cm	
		Maintain drain sizes as per size/specs	
		Annual desilting & de grassing of canals	
6	flood	Drain desilting as per schedule	
		WCP as part of management plan	



<p>4.4.2</p>	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -</p>	<p>Ayer Item POM Water Management plan was updated on 26/10/18. Key areas emphasised among others as detailed below. There are also PIC and time line being shown in the management plan</p> <table border="1" data-bbox="1028 491 1805 1023"> <thead> <tr> <th></th> <th>Key Areas</th> <th>Strategies</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water source</td> <td>Take account efficiency use of sources</td> </tr> <tr> <td rowspan="3">2</td> <td rowspan="3">Efficient use of water</td> <td>Ensure usage does not result in adverse impact within catchment area local communities</td> </tr> <tr> <td>optimise usage and reduce wastage</td> </tr> <tr> <td>Education &amp; training</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">Renewable water source</td> <td>Monitoring of rainfall data</td> </tr> <tr> <td>Rain water captured at catchment pond</td> </tr> <tr> <td rowspan="3">4</td> <td rowspan="3">Avoidance of contamination</td> <td>Avoid contamination of surface and ground water through run off</td> </tr> <tr> <td>Outgoing water be monitored to detect any negative impacts</td> </tr> <tr> <td>To ensure mill activities do not cause adverse impacts to water sources.</td> </tr> </tbody> </table> <p>The mitigation and action plans for the key areas identified among other as shown below;</p> <table border="1" data-bbox="1028 1153 1805 1385"> <thead> <tr> <th></th> <th>Key Areas</th> <th>Mitigation/Action Plan</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1</td> <td rowspan="2">Water source</td> <td>Rain water harvesting for mil compound</td> </tr> <tr> <td>Tube well for drinking water</td> </tr> <tr> <td rowspan="2">2</td> <td rowspan="2">Efficient use</td> <td>Installation of rain gutter</td> </tr> <tr> <td>Installation of flow meter - monitor intake</td> </tr> </tbody> </table>		Key Areas	Strategies	1	Water source	Take account efficiency use of sources	2	Efficient use of water	Ensure usage does not result in adverse impact within catchment area local communities	optimise usage and reduce wastage	Education & training	3	Renewable water source	Monitoring of rainfall data	Rain water captured at catchment pond	4	Avoidance of contamination	Avoid contamination of surface and ground water through run off	Outgoing water be monitored to detect any negative impacts	To ensure mill activities do not cause adverse impacts to water sources.		Key Areas	Mitigation/Action Plan	1	Water source	Rain water harvesting for mil compound	Tube well for drinking water	2	Efficient use	Installation of rain gutter	Installation of flow meter - monitor intake	<p>Complied</p>
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Criterion / Indicator		Assessment Findings		Compliance
			Monitor leakages	
		3	Renewable water source Rainfall monitoring Monitoring of catchment water level	
		4	Avoidance of contamination Inspection of bund CPO storage & SW store	
			Scheduled EFB despatches	
			Land application for POME discharge	
			Landfill min 400 m from water course	
			Implementation of rice straw at aerobic pond no 1 & anaerobic pond no 5 to manage algae growth & reduce BOD	

Criterion / Indicator		Assessment Findings	Compliance																																								
4.4.3	<p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6).</p> <p>- Minor compliance -</p>	<p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily.</p> <p>Ayer Item POM records the effluent monitoring for DOE submission in the '<i>Borang Penyata Suku Tahunan</i>'. Details as follows;</p> <table border="1"> <thead> <tr> <th></th> <th>Parameter</th> <th>2/10/18</th> <th>8/11/18</th> <th>4/12/18</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>7.6</td> <td>8.7</td> <td>8.3</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>70</td> <td>131</td> <td>39</td> </tr> <tr> <td>3</td> <td>COD</td> <td>1268</td> <td>1367</td> <td>1659</td> </tr> <tr> <td>4</td> <td>S Solids</td> <td>280</td> <td>176</td> <td>327</td> </tr> <tr> <td>5</td> <td>O&amp;G</td> <td>1</td> <td>1</td> <td>2</td> </tr> <tr> <td>6</td> <td>A Nitrogen</td> <td>119</td> <td>77</td> <td>53</td> </tr> <tr> <td>7</td> <td>Total Nitrogen</td> <td>183</td> <td>ND</td> <td>175</td> </tr> </tbody> </table> <p>The Mill license was for land application and the requirement is for the BOD to be less than 100 effective 01/1/19. Prior permissible level was 500 mg/L. The results from final discharge were compliance within parameter limit. Analysis was made using the services of <i>Envilab Sdn Bhd</i> accredited with MS ISO/IEC 17025 Testing SAMM No 298.</p>		Parameter	2/10/18	8/11/18	4/12/18	1	PH	7.6	8.7	8.3	2	BOD	70	131	39	3	COD	1268	1367	1659	4	S Solids	280	176	327	5	O&G	1	1	2	6	A Nitrogen	119	77	53	7	Total Nitrogen	183	ND	175	Complied
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Criterion / Indicator		Assessment Findings	Compliance																																																								
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	<p>Records of water consumption used for FFB processing are maintained. The entire 2018 data is given below.</p> <table border="1"> <thead> <tr> <th>Month /18</th> <th>FFB</th> <th>Water/L</th> <th>Water L/FFB</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>17589</td><td>22002</td><td>1.25</td></tr> <tr><td>Feb</td><td>14693</td><td>21896</td><td>1.49</td></tr> <tr><td>Mac</td><td>16874</td><td>26570</td><td>1.57</td></tr> <tr><td>April</td><td>11237</td><td>22033</td><td>1.96</td></tr> <tr><td>May</td><td>15308</td><td>28321</td><td>1.85</td></tr> <tr><td>June</td><td>13913</td><td>25454</td><td>1.83</td></tr> <tr><td>July</td><td>14753</td><td>25533</td><td>1.73</td></tr> <tr><td>Aug</td><td>16259</td><td>27619</td><td>1.70</td></tr> <tr><td>Sept</td><td>18626</td><td>27706</td><td>1.49</td></tr> <tr><td>Oct</td><td>19832</td><td>29802</td><td>1.50</td></tr> <tr><td>Nov</td><td>18925</td><td>25267</td><td>1.34</td></tr> <tr><td>Dec</td><td>18435</td><td>24153</td><td>1.31</td></tr> <tr><td><i>Total</i></td><td><i>196443</i></td><td><i>306356</i></td><td><i>1.56</i></td></tr> </tbody> </table> <p>Target is 1.40. the average consumption on ratio to FFB processed for the entire year is 1.56.</p>	Month /18	FFB	Water/L	Water L/FFB	Jan	17589	22002	1.25	Feb	14693	21896	1.49	Mac	16874	26570	1.57	April	11237	22033	1.96	May	15308	28321	1.85	June	13913	25454	1.83	July	14753	25533	1.73	Aug	16259	27619	1.70	Sept	18626	27706	1.49	Oct	19832	29802	1.50	Nov	18925	25267	1.34	Dec	18435	24153	1.31	<i>Total</i>	<i>196443</i>	<i>306356</i>	<i>1.56</i>	Complied
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Criterion / Indicator		Assessment Findings	Compliance																
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	<p>All the three estates in the CU continued to implement Integrated Pest Management (IPM). The estates continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Oil Palm Manual OPM No 5 –Pest And Diseases The IPM program among others involved the following practices;</p> <ul style="list-style-type: none"> <li>a) Includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma.</li> <li>b) In order to minimize use of pesticides and bagworm control the estates had planted beneficial plants mainly <i>Tunera subulata</i>, <i>cassia cobanensis</i> and <i>Antigonon leptopus</i> with maps indicating areas planted.</li> <li>c) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year. Baiting was continued until bait acceptance fell below 20%. Barn Owl boxes are erected at ratio of 1: 10 ha to 1: 20 ha.</li> </ul>	Complied																
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>Trainings were provided to the employees on the IPM management and procedures. Details as listed below.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Date</th> <th>Participants</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kulai Besar</td> <td>13/9/18</td> <td>12</td> </tr> <tr> <td>2</td> <td>Sg Rayat</td> <td>21/8/18</td> <td>15</td> </tr> <tr> <td>3</td> <td>G Tebong</td> <td>11/6/18</td> <td>6</td> </tr> </tbody> </table> <p>The training includes the management and practices of IPM as specified in 4.5.1 above.</p>		Estate	Date	Participants	1	Kulai Besar	13/9/18	12	2	Sg Rayat	21/8/18	15	3	G Tebong	11/6/18	6	Complied
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<p><b>Criterion 4.6:</b> Pesticides are used in ways that do not endanger health or the environment</p>																			

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.1</p>	<p>Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -</p>	<p>Justification of pesticides applied is available in the Sustainability Management Procedure, SMP-GPB-28 dated 21/07/2015 The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non- target species.</p> <p>Complied</p>

<p>4.6.2</p>	<p>Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -</p>	<p>The records of pesticides use as required by this indicator is sighted maintained.</p> <p>The table below shows records of weedicide /pesticide use for the last two financial years.</p> <p><u>Genting Kulai Besar Estate</u></p> <table border="1" data-bbox="1028 620 1805 1083"> <thead> <tr> <th rowspan="2">Active ingredients</th> <th colspan="4">a.i/ha (kg/ha)</th> </tr> <tr> <th colspan="2">2017</th> <th colspan="2">2018</th> </tr> </thead> <tbody> <tr> <td>Mature Area, ha</td> <td>1905.88</td> <td></td> <td>1753.91</td> <td></td> </tr> <tr> <td>Immature Area, ha</td> <td></td> <td>144.53</td> <td></td> <td>282.97</td> </tr> <tr> <td>Metsulfuron methyl 20% (LD<sub>50</sub> rat 5000 mg/kg)</td> <td>0.0436</td> <td>0.0234</td> <td>0.0356</td> <td>0.0173</td> </tr> <tr> <td>Glyphosate Isoprpylamine 41% (LD<sub>50</sub> rat 5000 mg/kg)</td> <td>1.5134</td> <td>2.6371</td> <td>1.3352</td> <td>0.9215</td> </tr> <tr> <td>Dimethylamine 60% (LD<sub>50</sub> rat 2000 mg/kg)</td> <td>0.1145</td> <td>0.0166</td> <td>0.0096</td> <td>0.0051</td> </tr> </tbody> </table> <p><u>Genting Sungei Rayat Estate</u></p> <table border="1" data-bbox="1028 1181 1805 1315"> <thead> <tr> <th rowspan="2">Active ingredients</th> <th colspan="4">a.i/ha (kg/ha)</th> </tr> <tr> <th colspan="2">2017</th> <th colspan="2">2018</th> </tr> </thead> <tbody> <tr> <td>Mature Area, ha</td> <td>2049.68</td> <td></td> <td>1931.89</td> <td></td> </tr> <tr> <td>Immature Area, ha</td> <td></td> <td>282.83</td> <td></td> <td>376.31</td> </tr> </tbody> </table>	Active ingredients	a.i/ha (kg/ha)				2017		2018		Mature Area, ha	1905.88		1753.91		Immature Area, ha		144.53		282.97	Metsulfuron methyl 20% (LD <sub>50</sub> rat 5000 mg/kg)	0.0436	0.0234	0.0356	0.0173	Glyphosate Isoprpylamine 41% (LD <sub>50</sub> rat 5000 mg/kg)	1.5134	2.6371	1.3352	0.9215	Dimethylamine 60% (LD <sub>50</sub> rat 2000 mg/kg)	0.1145	0.0166	0.0096	0.0051	Active ingredients	a.i/ha (kg/ha)				2017		2018		Mature Area, ha	2049.68		1931.89		Immature Area, ha		282.83		376.31	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance	
		Metsulfuron methyl 20% (LD <sub>50</sub> rat 5000 mg/kg)	0.0157	0.0379	0.0111	0.0591	
		Glyphosate Isoprpylamine 41% (LD <sub>50</sub> rat 5000 mg/kg)	0.7893	1.1394	0.6263	1.8809	
		Dimethylamine 60% (LD <sub>50</sub> rat 2000 mg/kg)	0.0216	-	0.0001	-	
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in GENP Sustainability Management Procedure Manual, SMP-GPB-28 Rev04, dated 3 July 2018. The implementation in the field is consistent with the manual. GENP views the use of agrochemicals in its daily operation as essential but not at the expense of its existing IPM programme. All pesticides application is carried out as per the Oil Palm Manual and SOP. There is no prophylactic use of pesticides.				Complied	



Criterion / Indicator		Assessment Findings	Compliance												
4.6.4	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances.</p> <p>- Minor compliance -</p>	<p>GENP only purchase chemicals that are registered under the Malaysian Pesticides Act 1974 (Act 149) and Regulations.</p> <p>Sighting of the Chemical Register dated 9/1/2018 at these estates showed that class 1B, II, III &amp; IV chemicals were used. There were no Class 1A agrochemicals used.</p> <p>Paraquat, a class 1B agrochemical was used for immature area (selective spray). The usage was found reduced.</p> <table border="1"> <thead> <tr> <th></th> <th>a.i/ha</th> <th>a.i/ha</th> </tr> <tr> <th>Year</th> <th>2017</th> <th>2018</th> </tr> </thead> <tbody> <tr> <td>Kulai Besar Estate</td> <td>2.637</td> <td>0.922</td> </tr> <tr> <td>Sungei Rayat Estate</td> <td>0.063</td> <td>0.054</td> </tr> </tbody> </table>		a.i/ha	a.i/ha	Year	2017	2018	Kulai Besar Estate	2.637	0.922	Sungei Rayat Estate	0.063	0.054	Complied
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<p>4.6.5</p>	<p>Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).          - Major compliance -</p>	<p>Pesticides were handled, used or applied by trained workers in accordance with the product label. The Pesticide operators were given training on the safe handling and application of the pesticides. All precautions attached to the products were explained to operators and noted during the interview with workers that they understood and properly observed them.</p> <p>#Please cross refer indicator 4.8.2</p> <p>Suitable personal protective equipment and application equipment were provided to the operators. Example of PPE provided for specific work units were:</p> <table border="1" data-bbox="1032 783 1785 1177"> <thead> <tr> <th data-bbox="1032 783 1207 882">Job description</th> <th data-bbox="1207 783 1785 882">PPE provide / Equipment provide</th> </tr> </thead> <tbody> <tr> <td data-bbox="1032 882 1207 1013">Sprayer</td> <td data-bbox="1207 882 1785 1013">Nitrile Rubber Glove, Respirator mask (organic vapour), Apron, Safety Goggles, Safety boot, CKS and all types</td> </tr> <tr> <td data-bbox="1032 1013 1207 1177">Manurer</td> <td data-bbox="1207 1013 1785 1177">Cotton glove, Nitrile Rubber Glove, Respirator mask (N95), Apron, Safety Goggles, Safety boot  Wheel barrow</td> </tr> </tbody> </table> <p>Agrochemical Sprayers, Pre-Mixer and Mandore's understanding on precautions attached to the products and wearing of the required PPE were checked in the field by the auditor. They were found understood during the interview and further confirmed by observing when they work.</p>	Job description	PPE provide / Equipment provide	Sprayer	Nitrile Rubber Glove, Respirator mask (organic vapour), Apron, Safety Goggles, Safety boot, CKS and all types	Manurer	Cotton glove, Nitrile Rubber Glove, Respirator mask (N95), Apron, Safety Goggles, Safety boot  Wheel barrow	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3).                      - Major compliance -</p>	<p>At all visited estates the storage of pesticides selected for use was in accordance with recognized best practices, namely, as per Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations.</p> <p>Their chemical stores were inspected and the following were noted.</p> <ul style="list-style-type: none"> <li>• All stores were secured under lock and key with restricted access.</li> <li>• Provision of ventilation fan.</li> <li>• Display of Safety Pictorial poster, namely the required PPE and chemical Safety hazards pictogram.</li> <li>• Pesticides were separated by class.</li> <li>• Daily balance of remaining solution after completing pre-mixing were kept in the store under lock and key.</li> <li>• Concrete cemented floor, bund wall and provision of sump pond.</li> <li>• Store keeper was trained in the handling of all pesticides.</li> <li>• SDS leaflets were available at all pesticide stores.</li> </ul> <p>Sighted the unused empty chemical containers that were triple rinsed, pierced 3 holes at the bottom and kept at Scheduled Waste Store. They are disposed via G-Planter Sdn Bhd. as non-scheduled waste. The approval of G-Planter to collect the containers was verified and found in order.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions were documented and justified in the SOP and the Justification of Pesticide procedure (SMP-GPB-28), dated 21/7/2015. The auditor witnessed mechanized circle spraying of pesticides in the immature field. The required PPE (Wellington boot, long sleeve shirt, long pants, apron, nitrile rubber glove, organic vapor cartridge respirator, goggles and safety helmet) were worn by the 3-team member, the tractor driver and 2 sprayers one on each side to the tractor.	Complied
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	There was no aerial spraying observed at Kulai Besar, Sungei Rayat and Tebong estates.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	<p>There are no smallholders associated with this CU.</p> <p>Pesticides are pre-mixed in 1000-liter tote tank. The Pre-mix Operator had been given training and interview revealed his understanding how to safely prepare the mixing as per procedure for different recipe.</p> <p>There is availability of safety pictorial poster for ease of understanding and Safety Data Sheet for reference in Bahasa Malaysia and English language placed adjacent to the pre-mixing area.</p> <p>Application spraying of the pre-mixed pesticides in the field is mechanised as sighted in the field (see 4.6.7 above) had demonstrate the team skills, knowledge and their awareness to methods that minimise risk and impacts.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.10</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3).            - Minor compliance -</p>	<p>All chemicals and containers were disposed of responsibly as per following procedure:            1. SMP-GPB-11, Scheduled Waste Management dated 11/10/2013.            2. SMP-GPB-12, Landfill and Domestic Waste Management dated 01/12/2014.            3. SMP-GPB-13, Recyclable Waste Management dated 11/10/2013.</p> <p>Scheduled waste are collected in suitable containers, inventoried, properly labelled, kept in the dedicated Scheduled Waste Store and disposed through licenced Scheduled Waste contractor, that is, Southern Strength Sdn Bhd and Kualiti Alam Sdn Bhd.            Office, domestic and garden waste are collected and sent to estate-managed landfill away from line site or water source.            Recyclable empty pesticides containers are triple rinsed and disposed through G-Planter as discussed in 4.6.6 above. Pesticides residues left in the containers were recovered during triple rinse and collected for use later in the field.</p> <p>GAIOM:            Visit in mill housing area seen domestic waste not properly dumped in bins and scattered on the ground in front of Block E workers quarters. Found also 2 pieces of fluorescent lamps in the domestic bin in front of Block A workers quarters.</p> <p>This indicated that disposal of waste material according to procedures not fully demonstrated being understood by workers. Hence, a minor noncompliance has been raised on this matter.</p>

Criterion / Indicator		Assessment Findings	Compliance
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	Annual medical surveillance had been conducted at the visited OU as follows: <ul style="list-style-type: none"> <li>- On 13.12.2018 at Kulai Besar Estate and Kulai Besar North for 9 workers (5 Sprayers, 3 Manurers, 1 Manuring Mandore and 1 Foreman) and 5 Sprayers respectively at Klinik Siti, Indahpura, Kulai. They were examined by Dr. Siti Aishah Binti Abdul Rahim, (OHD/HQ/15/DOC/00/414) and found fit to work without restrictions or limitations.</li> <li>- On 25.1.2019 to 31.1.2019 for 31 workers at Ayer Item POM. Awaiting results from RZ Intan Medicare as the doctor in attendance Dr. Zainudin B Muid (OHD/HQ/08/00/468) was away overseas.</li> <li>- On 28.3.2108 for 32 workers at Sungai Rayat Estate by Dr. Hussain B Moiz, (OHD/HQ/17/DOC/00/00005). Results showed all 32 workers fit to work.</li> <li>- On 17, 20 and 23<sup>rd</sup> May 2018 for 42 workers at Tebong Estate. They were examined by Dr. Kueh Poh Siew, (OHD/HQ/08/DOC/00/503) from Klinik Tampin. Results of examination found all 42 workers are fit to work.</li> </ul> <p>The result was communicated accordingly to workers involved.</p>	Complied
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	No work on pesticides has been undertaken by female worker. All workers handling pesticides were male as sighted in the field and records.	Complied
<p><b>Criterion 4.7:</b>            An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:</p>			

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.1</p> <p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.</p> <p>- Major compliance -</p>	<p>An Occupational Safety, Health and Hygiene Policy dated 20/7/2017 has been established and signed by Genting Plantation Senior Vice-President – Group Processing. It is available in Bahasa Malaysia and English language.</p> <p>The policy has been communicated to all employees through briefings and hardcopy of policies were seen displayed at the estates notice boards.</p> <p>A health and safety plan had been documented and implemented. Among others, it included:</p> <ul style="list-style-type: none"> <li>• establish OSH Committee and ensure functioning of the Committee including Quarterly meeting and conduct Workplace Inspection;</li> <li>• establish and reporting of Safety Performance;</li> <li>• risk assessed all operations and control risk as per SOP;</li> <li>• develop OSH Legal and Other Requirement Register and evaluation of its compliance;</li> <li>• Safety and Health Training Plan;</li> <li>• Chemical Health and Risk Assessment;</li> <li>• Medical surveillance;</li> <li>• Annual Audiometric test;</li> <li>• Workplace accident notification, investigation and reporting;</li> </ul>	<p>Complied</p>



<p>4.7.2</p>	<p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p>	<p>All operations have been risk assessed as per SOP for HIRARC (OM-GPB-07, Rev:0, Date:1/1/2010) and documented to address the identified issues. The end product, individual Risk register had been established at the POM and estates visited.</p> <p>HIRARC established at the mill were not limited to the following:</p> <ul style="list-style-type: none"> <li>ii. Maintenance and servicing – pump, press, lightning arrester</li> <li>v) Welding and cutting job, electrical works</li> <li>vi) Sterilizer – operation, cages handling, capstan line</li> <li>vii) FFB processing from stripping, oil extraction to storage and CPO dispatch and treatment of by-products/waste</li> <li>iv) Boiler house – ash removal from hopper chute, maintenance. Furnace cleaning, clinkers raking activities, determining control and PPE standards</li> <li>v) Engine room operation</li> <li>vi) Oil and effluent water sampling and analysis</li> </ul> <p>Whereas at the estates, examples include activities or areas such as:</p> <ul style="list-style-type: none"> <li>xiii) Chemical spraying;</li> <li>xiv) Harvesting;</li> <li>xv) Pruning;</li> <li>xvi) Manuring;</li> <li>xvii) Weeding;</li> <li>xviii) Rat baiting and bag worm treatment;</li> <li>xix) FFB loading, collection and transporting;</li> <li>xx) Transporting of workers;</li> <li>xxi) Workshop operations;</li> <li>xxii) Chemical, fertilizer and lubrication store;</li> <li>xxiii) Genset operation and maintenance;</li> <li>xxiv) Road maintenance.</li> </ul>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>For every hazard recognized in the Risk Register their corresponding actions have been documented and implemented to address the identified issues.</p> <p>HIRARC Register was last updated at GAIOM on 5.7.2018, at Sungei Rayat Estate 29.11.2018, at Tebong Estate on 1.8.2018.</p> <p>With respect to CHRA, all precautions recommended by the Assessor had been properly observed and applied to the workers. CHRA at the CU was conducted by DOSH Registered Assessor ID, JKPP HIE 127/171-2(154) from QMSPRO Sdn Bhd, Johor Bahru and the report validity period is still valid.</p>	

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.3 All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>- Minor compliance -</p>	<p>During field assessment, Sprayers and Harvesters were able to inform the assessment team about the fundamental of safety, the reason to work safely, the need to follow safe work practices and the consequence of deviation from procedures. For example, the machine-assisted sprayers understood not to spray upwind as the spray drift could be blown to their body, face and work clothings and if these parts of the body were exposed to the drift mist they could be harmful to them. On long-term they inform they could get sick. It is, they said, not only to spray follow downwind but also the need to wear the PPE properly.</p> <p>Likewise, boiler fireman at the mill was asked the danger of his work. He said during raking of ashes fly hot ash and fire splinters could land on the body and cause burn to the exposed skin if any. The surrounding area is also noisy. Therefore, there is need to put on apron, long sleeve shirt and long pants, leather gloves, goggles, face mask, hard hat and ear plug to prevent from being harm by the hot ash, fire splinters and noisy environment.</p> <p>All workers at the mill and estates have been trained to read safety signages and safe working practices including SOP for donning PPE related to their job function. See Criteria 4.8 for sample of training given.</p> <p>Adequate PPE has been seen provided to workers. In the sampled interviewed and workers sighted, PPE worn was found appropriate and in good condition. Damage PPE will be replaced by the company free of charge.</p>	<p>Complied</p>

<p>4.7.4</p>	<p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>The respective Mill and Estate Manager appoint an Assistant Manager of theirs as the person in charge for safety and environment. The PIC role covers areas of responsibilities on safety, health and welfare of the staff/workers. The Mill and Estates Managers in turn are appointed as the Chairman for the S&amp;H committee. His duties among others is to preside the S&amp;H meetings, discharge the General Duties of Employers and make decision arising out of issues discussed for improvement to Safety, Health, Welfare and the Environment.</p> <p>The management of each operating unit conduct regular two-way communication with their employees through the mandatory 3-monthly S&amp;H meeting or more frequent.</p> <p>The minutes of meeting were sighted and verified. The dates of meetings held are recorded below.</p> <table border="1" data-bbox="1028 911 1805 1378"> <tr> <td colspan="4"><b>Ayer Item Palm Oil Mill</b></td> </tr> <tr> <td>Meeting No. 1</td> <td>01.03.2018</td> <td>Meeting No 3</td> <td>13.07.2018</td> </tr> <tr> <td>Meeting No 2</td> <td>27.04.2018</td> <td>Meeting No 4</td> <td>10.10.2018</td> </tr> <tr> <td>Meeting No. 5</td> <td>12.12.2018</td> <td></td> <td></td> </tr> <tr> <td colspan="4"><b>Kulai Besar Estate</b></td> </tr> <tr> <td>Meeting No. 1</td> <td>27.03.18</td> <td>Meeting No 3</td> <td>20.9.18</td> </tr> <tr> <td>Meeting No 2</td> <td>28.06.18</td> <td>Meeting No 4</td> <td>18.12.18</td> </tr> <tr> <td colspan="4"><b>Sungei Rayat Estate</b></td> </tr> <tr> <td>Meeting No. 1</td> <td>28.3.18</td> <td>Meeting No 3</td> <td>6.9.18</td> </tr> <tr> <td>Meeting No 2</td> <td>27.6.18</td> <td>Meeting No 4</td> <td>14.12.18</td> </tr> <tr> <td colspan="4"><b>Tebong Estate</b></td> </tr> <tr> <td>Meeting No. 1</td> <td>21.3.18</td> <td>Meeting No 3</td> <td>17.8.18</td> </tr> <tr> <td>Meeting No 2</td> <td>23.5.18</td> <td>Meeting No 4</td> <td>25.10.18</td> </tr> <tr> <td>Meeting No. 5</td> <td>12.11.18</td> <td></td> <td></td> </tr> </table>	<b>Ayer Item Palm Oil Mill</b>				Meeting No. 1	01.03.2018	Meeting No 3	13.07.2018	Meeting No 2	27.04.2018	Meeting No 4	10.10.2018	Meeting No. 5	12.12.2018			<b>Kulai Besar Estate</b>				Meeting No. 1	27.03.18	Meeting No 3	20.9.18	Meeting No 2	28.06.18	Meeting No 4	18.12.18	<b>Sungei Rayat Estate</b>				Meeting No. 1	28.3.18	Meeting No 3	6.9.18	Meeting No 2	27.6.18	Meeting No 4	14.12.18	<b>Tebong Estate</b>				Meeting No. 1	21.3.18	Meeting No 3	17.8.18	Meeting No 2	23.5.18	Meeting No 4	25.10.18	Meeting No. 5	12.11.18			<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.5</p> <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>The GAIOM CU continued to maintain their Emergency Response procedure. Estates assessed has site specific Plans in the OSH Manual (OM-GPB-04, Rev:0, Dated 1/1/10) that identify emergency scenarios for response to accident, fire and chemical spillage. There is also map displayed showing location of fire extinguishers, evacuation routes to assembly areas at both mill and estate offices. An up-to-date lists of emergency contacts was also made available in the field with mandores, offices of the estates and mill.</p> <p>Training had been conducted to communicate the Emergency Response Plan and procedure to all workers. The drill has been conducted on yearly basis. At</p> <ul style="list-style-type: none"> <li>• GAIOM on 26/8/18 jointly with BOMBA. It was preceded by a tabletop exercise done on 24.8.2018, 13/2/2018;</li> <li>• GKBE (fire drill) on 28/3/2018;</li> <li>• GSRE (fire drill) on 9/12/17</li> <li>• GTE (fire drill) on 1/3/2018.</li> </ul> <p>Trained assigned operatives as First Aiders available at the CU, among others, comprised of operators, clerks, supervisors and mandores. First aid boxes were noted made available at various points in the mill and estates complex including office, workshop, sprayers washing facilities, and with mandore in the field, etc.</p> <p>Records of accident including investigation report, DOSH forms JKPP 6 and JKPP 8 were sighted kept. As per procedure, all cases of accidents more than 4 days were investigated. Please see 4.7.7 below for LTA metrics. The S&amp;H committee reviewed the HIRARC and where relevant change the severity and/or likely rating and institute corresponding control measures.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance	
<p>4.7.6</p>	<p>All workers shall be provided with medical care, and covered by accident insurance.            - Minor compliance -</p>	<p>The CU continued to ensure all workers working in their premises (both mill and estates) are covered by insurance. All local workers are covered by SOCSO as required under the Employee’s Social Security Act 1969. Sampled payment details at as follows:</p> <p>GKBE - Value date: 12.11.2018, Receipt No.: SOC00000104695, Total employees: 32 and Amount Paid: RM 1275.50</p> <p>GKSR - Value date: 1.11.2018, Receipt No.: SOC00000108319, Total employees: 30 and Amount Paid: RM 1219.80</p> <p>Foreign workers were covered by insurance as per the Workmen Compensation Act 1952. Insurance Underwriter is MSIG Insurance (Malaysia) Bhd and policy details as below.</p> <p>GAIOM - LONPAC INSURANCE FCWA Policy No.: W/19/WF01/0678891/KUL-66 for 42 workers valid from 1.1.2019 to 31.12.2019.</p> <p>GKBE - LONPAC INSURANCE FCWA Policy No.: W/19/WF01/067879/KUL-61 for 132 workers valid from 1.12019 to 31.12.2019.</p> <p>GSRE - LONPAC INSURANCE FCWA Policy No.: W/19/WF01/067885/KUL-62 for 99 workers valid from 1.1.2019 to 31.12.2019.</p> <p>GTE - LONPAC INSURANCE FCWA Policy No.: W/19/WF01/067874/KUL-68 for 157 workers valid from 1.1.2019 to 31.12.2019.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance															
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	Records of accidents are maintained and summarized in the relevant form and submitted to DOSH as per OSH NADOOPOD Regulations 2004. The occurrence of accidents recorded for YTD November 2018 is as shown below: <table border="1" data-bbox="1025 523 1765 628"> <thead> <tr> <th></th> <th>GAIOM</th> <th>GKBE</th> <th>GSRE</th> <th>GTE</th> </tr> </thead> <tbody> <tr> <td>No. of cases</td> <td>5</td> <td>9</td> <td>2</td> <td>3</td> </tr> <tr> <td>LTI, days</td> <td>2</td> <td>18</td> <td>0</td> <td>42</td> </tr> </tbody> </table>		GAIOM	GKBE	GSRE	GTE	No. of cases	5	9	2	3	LTI, days	2	18	0	42	Complied
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<b>Criterion 4.8:</b> All staff, workers, smallholders and contract workers are appropriately trained.																		

<p>4.8.1</p>	<p>A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -</p>	<p>All employees and contractors were provided training related to their job skills, RSPO requirements, Occupational Health &amp; Safety and Environmental matters. They training program include productivity and best management practice subjects by growers and miller. Specific to estates the examples include felling of oil palm trees, nursery, replanting, harvesting and upkeep of fields to evacuation of FFB to mill. Likewise, at the mill it covers from FFB receipt, grading, processing to Crude Palm Oil, storage and dispatch of CPO, nut kernel and the management of by-products, wastes and waste streams.</p> <p>Records of evaluation to check the understanding of participants was also sighted. The training program specified the target group of employees to be trained for the identified subjects.</p> <p>The following topics, among others, were included in the 2018/19 annual training program;</p> <ul style="list-style-type: none"> <li>a) OSH Act &amp; regulations 1994.</li> <li>b) Environmental Quality Act 1974</li> <li>c) Induction Program for new workers.</li> <li>d) OSH Committee and function.</li> <li>e) First Aid Training</li> <li>f) Scheduled waste training</li> <li>g) RSPO/MSPO/ISCC Principles</li> <li>h) HCV &amp; Biodiversity training.</li> <li>i) Mechanical/electrical workshop</li> <li>j) Environmental/safety &amp; health policy/ environmental responsibility,</li> <li>k) Emergency Response drill</li> <li>l) Social program</li> </ul>	<p>Complied</p>
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<p>4.8.2</p>	<p>Records of training for each employee shall be maintained.          - Minor compliance -</p>	<p>Records of training were sighted during this audit, sample noted are as shown below:</p> <p>a) Genting Ayer Item Oil Mill</p> <table border="1"> <thead> <tr> <th>No</th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr><td>1</td><td>21.1.18</td><td>SOM/ECP – Mill Cleaning</td><td>4</td></tr> <tr><td>2</td><td>7.2.18</td><td>Traceability and Supply Chain</td><td>22</td></tr> <tr><td>3</td><td>8.3.18</td><td>Lorry Driver –Trailer Buka Canvas</td><td>15</td></tr> <tr><td>4</td><td>16.4.18</td><td>SOM/SOP/ECP – Kernel Plant, Boiler, Driver</td><td>4</td></tr> <tr><td>5</td><td>18.5.18</td><td>HIRARC</td><td>6</td></tr> <tr><td>6</td><td>18.6.18</td><td>Noise Awareness</td><td>86</td></tr> <tr><td>7</td><td>3.8.18</td><td>SO/SOP/ECP - Sterilizer</td><td>2</td></tr> <tr><td>8</td><td>10.8.18</td><td>PPE Training</td><td>16</td></tr> <tr><td>9</td><td>21.8.18</td><td>GHG Calculation</td><td>4</td></tr> <tr><td>10</td><td>26.8.18</td><td>Fire Evacuation drill</td><td>60</td></tr> <tr><td>11</td><td>27.9.18</td><td>Scheduled Waste Management</td><td>38</td></tr> <tr><td>12</td><td>15.10.18</td><td>Environmental Aspect Impact</td><td>20</td></tr> <tr><td>13</td><td>17.10.18</td><td>Working in Confine Space</td><td>14</td></tr> <tr><td>14</td><td>10.12.18</td><td>SOM/SOP/ECP Boiler, Loading Ramp, Crane, Process</td><td>3</td></tr> <tr><td>15</td><td>25.10.18</td><td>SOM Mill Laboratory</td><td>2</td></tr> </tbody> </table> <p>b) Genting Kulai Besar Estate</p> <table border="1"> <thead> <tr> <th>No</th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr><td>1</td><td>11.3.18</td><td>Latihan pengendalian Jentera</td><td>30</td></tr> <tr><td>2</td><td>26.3.18</td><td>PPE Training</td><td>26</td></tr> <tr><td>3</td><td>24.7.18</td><td>Cara Selamat Menyembur Racun</td><td>18</td></tr> </tbody> </table>	No	Date	Subject	Attendees	1	21.1.18	SOM/ECP – Mill Cleaning	4	2	7.2.18	Traceability and Supply Chain	22	3	8.3.18	Lorry Driver –Trailer Buka Canvas	15	4	16.4.18	SOM/SOP/ECP – Kernel Plant, Boiler, Driver	4	5	18.5.18	HIRARC	6	6	18.6.18	Noise Awareness	86	7	3.8.18	SO/SOP/ECP - Sterilizer	2	8	10.8.18	PPE Training	16	9	21.8.18	GHG Calculation	4	10	26.8.18	Fire Evacuation drill	60	11	27.9.18	Scheduled Waste Management	38	12	15.10.18	Environmental Aspect Impact	20	13	17.10.18	Working in Confine Space	14	14	10.12.18	SOM/SOP/ECP Boiler, Loading Ramp, Crane, Process	3	15	25.10.18	SOM Mill Laboratory	2	No	Date	Subject	Attendees	1	11.3.18	Latihan pengendalian Jentera	30	2	26.3.18	PPE Training	26	3	24.7.18	Cara Selamat Menyembur Racun	18	<p>Complied</p>
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		4	20.7.18	Harvesting and Safety	11	
		5	2.10.18	Rat Baiting	11	
		6	3.12.18	SOP Kimpalan	2	
		c) Genting Sungei Rayat Estate				
		No	Date	Subject	Attendees	
		1	17.2.18	Rat Baiting	15	
		2	6.3.18	HIRARC For OSH Committee	11	
		3	22.3.18	Trunk Injection Application	7	
		4	30.5.18	Fertilizer Application - Semi-Mechanize)	6	
		5	21.8.18	Integrated Pest Management	15	
		6	22.8.18	Chemical Mixing and PPE	14	
		7	13.7.18	CDA Pump	26	
		d) Genting Tebong Estate				
		1	17.1.18	SOP, PPE & HIRARC for Harvester	10	
		2	18.1.18	Safe Handling of P&D Chemicals	21	
		3	1.3.18	Nursery –GAPN and Safety Training	14	
		4	11.6.18	Latihan Ulangan Penggunaan Mesin Penuaian Buah Sawit	10	
		5	14.6.18	Excavator Driving	6	
		6	4.12.18	First Aid	15	
		7	6.12.18	Chemical Spraying	8	
		8	6.12.18	Mauring	9	

Criterion / Indicator	Assessment Findings	Compliance
<b>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</b>		
<b>Criterion 5.1:</b>	Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	

<p>5.1.1</p>	<p>An environmental impact assessment (EIA) shall be documented. - Major compliance -</p>	<p>Both the mill and estates had established its environmental aspects / impacts register associated with their activities. The assessment report is compiled to describe the following information;</p> <ul style="list-style-type: none"> <li>a) Aspect, impacts type</li> <li>b) Legal requirement</li> <li>c) Evaluation &amp; significance</li> <li>d) Mitigation &amp; control measures</li> <li>e) Training</li> <li>f) Person In Charge &amp;Time line</li> </ul> <p>The Mill EAI established for 2019 was dated 7/11/18. The identification and evaluation of environmental impact have covered all the core activities and processes related to the mill operation. Among others the most significant environmental concerns/receptors are;</p> <ul style="list-style-type: none"> <li>a) the boiler stack emission which is associated with air emission, analysis made as follows;             <ul style="list-style-type: none"> <li>- 21/8/18 = 0.365 g/Nm<sup>3</sup></li> <li>- 11/12/18 = 0.193 g/Nm<sup>3</sup></li> </ul> </li> <li>b) Palm oil mill effluent (POME) discharge. Results of effluent quality as described in 4.4.3.</li> <li>c) Land contamination which related to managing the scheduled waste and general waste.</li> </ul> <p>The activities in the EAI covered are as follows;</p> <table border="1" data-bbox="1025 1201 1747 1369"> <thead> <tr> <th></th> <th>Stations</th> <th></th> <th>Stations</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Marketing</td> <td>8</td> <td>Incinerator</td> </tr> <tr> <td>2</td> <td>Office &amp; security</td> <td>9</td> <td>Clarification</td> </tr> <tr> <td>3</td> <td>Mill compound</td> <td>10</td> <td>Digester &amp; Press</td> </tr> <tr> <td>4</td> <td>Weighbridge</td> <td>11</td> <td>Boiler / Kernel plant</td> </tr> </tbody> </table>		Stations		Stations	1	Marketing	8	Incinerator	2	Office & security	9	Clarification	3	Mill compound	10	Digester & Press	4	Weighbridge	11	Boiler / Kernel plant	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance
		5	Grading ramp	12	Despatches	
		6	Loading ramp	13	Effluent / WTP	
		7	Steriliser / Thresher			
		<p>The estates recent environment aspect impact assessment was reviewed on 10/8/18 to cover all activities from harvesting, pest and disease, upkeep programme until delivery to mill. The main purpose of this assessment was to evaluate and analyse impact on soil, water, and air associated with the organization activities. Among others the environment aspects assessed were;</p>				
			Activities		Activities	
		1	Pesticide application	8	Landfill / catchment	
		2	Spraying -residential areas	9	Int & ext transport,	
		3	Fertiliser application, EFB,	10	HCV areas	
		4	Harvesting activities	11	Nursery	
		5	Chemical, fertiliser stores	12	replanting	
		6	Diesel tank & gen stores	13	loading ramp	
		7	residential areas	14	bunch ash application	

Criterion / Indicator	Assessment Findings	Compliance
<p>5.1.2</p>	<p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.</p> <p>- Minor compliance -</p> <p>This is elaborated in 5.3.3 under title "<i>waste management and disposal plan to avoid or reduce pollution</i>". Therein being shown the time line and the person in charge of the management plan. The management plan is reviewed annually. The Waste Management and Disposal Plan 2019 comprising of Pollution Prevention Plan 2019. Among others the pollution prevention being identified are;</p> <ul style="list-style-type: none"> <li>f) The control of black smoke emissions,</li> <li>g) monitoring watercourse quality</li> <li>h) Scheduled waste management               <ul style="list-style-type: none"> <li>- Segregation. To ensure contaminated waste been stored.</li> <li>- Recycle. To collect &amp; sell scrap iron.</li> </ul> </li> <li>i) Effluent discharge monitoring.</li> <li>j) Production activities               <ul style="list-style-type: none"> <li>- Reduce of cotton rags usage. To use fibre for cleaning CPO spillage /oil leaking</li> <li>- Reused of biomass waste. To max utilisation of fibre/shell as boiler fuel.</li> </ul> </li> </ul> <p>Sighted records of monitoring by the mill.</p> <p>The estates made no major changes to the environmental aspects and impacts or current practices which require changes in the environmental action plans. On a continual basis the existing environmental action plans had identified timeframes and responsible person at each operating unit assessed. This being discussed during the OSH meeting and Management Review</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>5.1.3</p>	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p> <p>All the three estates made initiatives to minimize chemical usage in the following identified activities among others:</p> <ul style="list-style-type: none"> <li>a) to reduce usage of insecticide and pesticide (<i>cypermethrin</i>) by               <ul style="list-style-type: none"> <li>- Prevention of pest breeding area by doing good agricultural practices during replanting – ensuring thin chipping of trunks and all trunk debris must stack in close ended trenches</li> </ul> </li> <li>b) to prevent of usage of chemical class 1 (<i>methamidaphos</i>) for control bagworm by               <ul style="list-style-type: none"> <li>- to plant more beneficial plants,</li> <li>- change to <i>acephate</i></li> </ul> </li> <li>c) to reduce usage of rat bait by establishing and maintenance of barn owl boxes.</li> </ul> <p>Genting Ayer Item Mill - The identified Pollution Identification Environmental Improvement Plan' the following are monitored for the effectiveness of the mitigation measures. The following indexes are being monitored :</p> <ul style="list-style-type: none"> <li>a) Black Smoke Monitoring</li> <li>b) Effluent Discharge Monitoring.               <ul style="list-style-type: none"> <li>- Usage of rice straw /husk in effluent pond to eliminate algae presence and reduce BOD.</li> </ul> </li> <li>c) Monitoring Water course               <ul style="list-style-type: none"> <li>- Scheduled water quality monitoring for detection of contamination</li> </ul> </li> <li>d) Centralized area for collecting Scheduled Waste</li> </ul>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<b>Criterion 5.2:</b> The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.		



<p>5.2.1</p>	<p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).          - Major compliance -</p>	<p>The CU had re-assessed to collate information relating to HCV. The assessment contained information of both planted area and relevant wider landscape-level, and result HCV identified. There was 2 separate reports prepared by the HCV assessors 1 each for the Southern region and central region covering among others the mill/estates audited GAPOM, GKBE, GSRE and GTE respectively. There is no HCV identified in both GAPOM and GKBE</p> <p>The report of assessment contained in "<i>High Conservation Value (HCV) Final Report (Version 2.0), 02 Jan 2015</i>". The assessment was made by the Chairman of MNS Malaysian Nature Society. The GSRE which is adjacent to <i>Hutan Simpan Bindu</i> had identified HCV areas as follows</p> <ul style="list-style-type: none"> <li>a) Chinese cemetery next to OP18D</li> <li>b) Muslim Cemetery adjacent to OP98A</li> <li>c) Hindu Temple next to OP02A</li> </ul> <p>The following aspects areas were assessed as to their state and management.</p> <ul style="list-style-type: none"> <li>- Area of HCV-Shared management of forest reserve and boundary areas/buffer zones</li> <li>- The presence of large mammals and birds and how they are protected from poaches.</li> <li>- IPM: use of plants to attract <i>parasitoids</i> to control bagworms &amp; barn owls for rats management and success</li> <li>- Drainage and the conditions. Determining the presence of fishes as a bio-indicator of water health</li> </ul> <p>Similarly GTE have categorised the following areas as the HCV.</p> <ul style="list-style-type: none"> <li>a) Cemetery areas</li> <li>b) Hindu temples</li> </ul>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance																									
		<p>c) Water catchment The breakdown of the HCV classes identified in the estate at various sites is given below;</p> <table border="1"> <thead> <tr> <th></th> <th>Division</th> <th>HCV 1</th> <th>HCV 4</th> <th>HCV 6</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Home</td> <td>1.4</td> <td>4.2</td> <td>6</td> </tr> <tr> <td>2</td> <td>Batang Melaka</td> <td>-</td> <td>-</td> <td>6</td> </tr> <tr> <td>3</td> <td>See Kee</td> <td>-</td> <td>4.2</td> <td>6</td> </tr> <tr> <td>4</td> <td>Repah</td> <td>-</td> <td>4.2</td> <td>6</td> </tr> </tbody> </table> <p>The HCV assessment for GTE was made by an appointed qualified assessor titled Inventory On HCV sited in Feb-Mac 2010. The report was sighted and verified.</p>					Division	HCV 1	HCV 4	HCV 6	1	Home	1.4	4.2	6	2	Batang Melaka	-	-	6	3	See Kee	-	4.2	6	4	Repah	-	4.2	6	
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<p>5.2.2</p>	<p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -</p>	<p>The RTE assessment was incorporated in the HCV report and evaluation. Therein providing wildlife database categories of;</p> <ul style="list-style-type: none"> <li>a) Birds / Mammals</li> <li>b) <i>Herpetofauna</i> / Conservation status</li> <li>c) List of offences and penalties under Wildlife Conservation Act 2010.</li> <li>d) Provocation of wildlife.</li> </ul> <p>In records there is no RTE species observed/spotted within the member estates in CU. Relevant action plans had been established and implemented concerning protection of the riparian, such as identification on map and ground, restriction of no chemicals activities, awareness training to workers and patrolling by Auxiliary Police</p> <table border="1" data-bbox="1028 847 1803 1398"> <thead> <tr> <th></th> <th>HCV area</th> <th>Management &amp; Monitoring</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Protected areas</td> <td>Boundary markers estate/forest reserve Signage on no illegal hunting/collecting &amp; no authorised entry</td> </tr> <tr> <td>2</td> <td>RTE</td> <td>Patrol the boundary area Inform all stakeholders on HCV assessment and protection Education &amp; awareness for workers Ensure no agrochemicals activities at bordering water bodies</td> </tr> <tr> <td>3</td> <td>Sacred sites</td> <td>Clear demarcation and proper fencing at identified HCV Inform community concerning utilisation of site To maintain cleanliness / upkeep of areas Maintain a buffer in order to secure the ares from fire and other disturbances</td> </tr> </tbody> </table>		HCV area	Management & Monitoring	1	Protected areas	Boundary markers estate/forest reserve Signage on no illegal hunting/collecting & no authorised entry	2	RTE	Patrol the boundary area Inform all stakeholders on HCV assessment and protection Education & awareness for workers Ensure no agrochemicals activities at bordering water bodies	3	Sacred sites	Clear demarcation and proper fencing at identified HCV Inform community concerning utilisation of site To maintain cleanliness / upkeep of areas Maintain a buffer in order to secure the ares from fire and other disturbances	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		To include areas in HCV map	
5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	There were programs held by the estates /mill to all employees in pertaining to the awareness of HCV areas and RTE species. Interview with the employees concluded that training and briefing made during the ad hoc session and morning muster. This is also emphasized during the training held by the Sustainability Unit programs. Employees are aware of the following reminders; a) An offence to capture, harm, kills any wildlife. b) Disciplinary measures shall be taken if found violating company rules. c) Riparian buffer zone to be free from any chemicals application/pollution d) Relevant signs <i>NO HUNTING NO FELLING ALLOWED</i>	Complied
5.2.4	Where a management plan has been created there shall be ongoing monitoring: • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	The CU observed implemented the established action plans, including monitoring (patrolling) of the conservation areas by Auxiliary Police. Record of monitoring (patrolling) observed maintained. Observed that there is no monitoring outcomes that requires changed of practices or action plan.	Complied
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	There is no HCV set-asides with existing rights of local communities were observed.	Complied
<b>Criterion 5.3:</b> Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			

Criterion / Indicator		Assessment Findings	Compliance																											
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	<p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan 2019. The common waste generated from the mill/estates operations is shown below;</p> <table border="1"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td>2</td> <td>Domestic waste</td> <td>rubbish from the mill complex and employees' quarters</td> </tr> <tr> <td>3</td> <td>Industrial waste</td> <td>Fibre, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td>4</td> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table> <p>The pollution identified from the mill activities</p> <table border="1"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>Emission from Boilers</td> </tr> <tr> <td>2</td> <td>Odour &amp; gases</td> <td>Activities from the effluent treatment</td> </tr> <tr> <td>3</td> <td>Lubricant leakage</td> <td>Storage &amp; vehicle maintenance</td> </tr> </tbody> </table>		Type of waste	Details	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	2	Domestic waste	rubbish from the mill complex and employees' quarters	3	Industrial waste	Fibre, palm kernel shell, boiler ash, scrap iron	4	Sewage	Sewage from housing/office complex		Type of waste	Details	1	Black smoke	Emission from Boilers	2	Odour & gases	Activities from the effluent treatment	3	Lubricant leakage	Storage & vehicle maintenance	Complied
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5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	<p>The identified wastes among others include empty chemical containers including pesticides containers.</p> <ul style="list-style-type: none"> <li>a) Empty pesticides containers were washed at washing station prior to disposal.</li> <li>b) Disposals were carried out in compliance with relevant regulation of scheduled waste.</li> <li>c) Inventory and consignment documents verified for confirmation of proper management and disposal.</li> </ul> <p>GAIOM scheduled waste was recent disposed on 6/12/18 through licensed contractor: <i>Southern Strength Sdn Bhd</i> for the following items</p> <ul style="list-style-type: none"> <li>- SW305 – 0.3660 mt</li> <li>- SW 409 – 0.2587 mt</li> <li>- SW 410 – 0.1395 mt</li> </ul> <p>GSRE made the following despatches on 18/1/19</p> <ul style="list-style-type: none"> <li>- SW 410 - 0.1056 mt / 0.0610 mt</li> <li>- SW 305 – 0.2530 mt</li> <li>- SW 306 – 0.0096 mt</li> </ul>	Complied

5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	<p>The waste and disposal plan listed the waste generated from the mill/estates operations is described below;</p> <table border="1" data-bbox="1028 459 1805 1399"> <thead> <tr> <th data-bbox="1028 459 1088 523"></th> <th data-bbox="1088 459 1218 523">Type of waste</th> <th data-bbox="1218 459 1391 523">Description</th> <th data-bbox="1391 459 1805 523">Action to be taken</th> </tr> </thead> <tbody> <tr> <td data-bbox="1028 523 1088 1013">1</td> <td data-bbox="1088 523 1218 1013">Industrial waste</td> <td data-bbox="1218 523 1391 1013">EFB</td> <td data-bbox="1391 523 1805 1013">Sent for mulching in the estates. To ensure and submit EFB disposal schedule and location every month To dispose EFB within 14 days upon storage To ensure no open burning activity on EFB and mill waste To design EFB storage area in ensuring no spillage of leachate into monsoon drain.</td> </tr> <tr> <td data-bbox="1028 1013 1088 1013"></td> <td data-bbox="1088 1013 1218 1013"></td> <td data-bbox="1218 1013 1391 1013">Scrap iron</td> <td data-bbox="1391 1013 1805 1013">Dispose as sale to assigned vendor by Regional office. Recycle where appropriate for workshop maintenance</td> </tr> <tr> <td data-bbox="1028 1013 1088 1399"></td> <td data-bbox="1088 1013 1218 1399"></td> <td data-bbox="1218 1013 1391 1399">POME</td> <td data-bbox="1391 1013 1805 1399">Treated in effluent plant. The final discharge from the treatment plant is used for water discharge. Effluent quality monitoring on monthly basis. The monitoring of the effluent discharge is reported to DOE on monthly and quarterly basis. This practice is accordance with the requirements in the written approval issued by DOE.</td> </tr> </tbody> </table>		Type of waste	Description	Action to be taken	1	Industrial waste	EFB	Sent for mulching in the estates. To ensure and submit EFB disposal schedule and location every month To dispose EFB within 14 days upon storage To ensure no open burning activity on EFB and mill waste To design EFB storage area in ensuring no spillage of leachate into monsoon drain.			Scrap iron	Dispose as sale to assigned vendor by Regional office. Recycle where appropriate for workshop maintenance			POME	Treated in effluent plant. The final discharge from the treatment plant is used for water discharge. Effluent quality monitoring on monthly basis. The monitoring of the effluent discharge is reported to DOE on monthly and quarterly basis. This practice is accordance with the requirements in the written approval issued by DOE.	Complied
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				Review of the results revealed that the quality of the effluent discharge is in within the regulatory limit.	
			Boiler ash	Disposed to designated dumping site near holding pond Daily leveling monthly using backhoe.	
	2	Schedule Waste	SW305/306 /102/410/109 SW 409/410/322/429	Clean and tidy storage area Separation of type SW using labels 10cm x 10cm To ensure spillage trap functions effectively Monthly stock verification by executives Ensure inventory not exceeding 180 days / 20 mt Follow approved consignment note and update in ESWIS training to the SW handlers Disposal to Kualiti Alam Sdn Bhd except SW 430 – obsolete lab chemicals. Disposal to Southern Strength SB	
		Domestic Waste	Rubbish/ garden waste	Disposal made 2x /week for both mill/estate on a different day. Encourage 3R program – disposal via estate landfill.	



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				Provide adequate dustbins line sites /office complex Weekly inspection by MA/exec Awareness on hygiene.	
			Sewage	Provide adequate washrooms/ toilets at mill and line sites To ensure employees' quarters equipped with appropriate septic tank Cleaning/desludging septic tank done by appointed contractor.	
<b>Criterion 5.4:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised.					

<p>5.4.1</p>	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the following;</p> <ul style="list-style-type: none"> <li>a) Environmental Aspect and Impact Assessment Register for 2019 latest revision dated 07/11/18.</li> <li>b) Diesel usage efficiency and optimisation renewable energy dated 31/1/19</li> </ul> <p>Diesel usage efficiency and optimisation renewable energy</p> <table border="1" data-bbox="1032 651 1785 1023"> <thead> <tr> <th colspan="3">Mill</th> </tr> <tr> <th></th> <th>Concern</th> <th>Management Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Diesel usage</td> <td>Shut off engine if &gt; 3 min Maintain operating 3 presses Run TNB to reduce gen-sets running Scheduled inspection of boiler</td> </tr> <tr> <td>2</td> <td>GHG emission</td> <td>Min gen-set running Regular checking of vehicle</td> </tr> <tr> <td>3</td> <td>Diesel use/year</td> <td>Target consumption &lt; 80000 L /year Change gen-set to TNB during non processing hours</td> </tr> </tbody> </table> <table border="1" data-bbox="1032 1054 1785 1378"> <thead> <tr> <th colspan="3">Estates</th> </tr> <tr> <th></th> <th>Concern</th> <th>Management Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Diesel usage</td> <td>to carry out scheduled maintenance for machineries to ensure diesel and lubricant usage is at optimal level and in good condition. to brief workers during muster briefing on how to reduce diesel usage. Example turn off engine when not in used.</td> </tr> </tbody> </table>	Mill				Concern	Management Plan	1	Diesel usage	Shut off engine if > 3 min Maintain operating 3 presses Run TNB to reduce gen-sets running Scheduled inspection of boiler	2	GHG emission	Min gen-set running Regular checking of vehicle	3	Diesel use/year	Target consumption < 80000 L /year Change gen-set to TNB during non processing hours	Estates				Concern	Management Plan	1	Diesel usage	to carry out scheduled maintenance for machineries to ensure diesel and lubricant usage is at optimal level and in good condition. to brief workers during muster briefing on how to reduce diesel usage. Example turn off engine when not in used.	<p>Complied</p>
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		to carry out road maintenance programme as planned to ensure it is always in good condition to ease tractor movement																																																									
2	Skid tank management:	to ensure all equipment for loading and unloading diesel in good condition.																																																									
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<b>Criterion 5.5:</b> Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.			
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	There was no land preparation in the Estates CU by burning ever since Genting Plantations practice zero burning as per the policy in the Zero Burning Policy dated 10/8/11 signed by the President & Chief Operating Officer. Therein stating a) No open burning of any kind in all OU b) All types of waste products disposed appropriately c) Limited open burning allowed for cooking and religious purposes under appropriate supervision.  In the 2018 replants visited during the audit in GKBE it was evident that all palms were felled, shredded, windrowed and left to decompose.	Complied
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	There was no evidence that fire had been used to prepare land for replanting in all the estates. No fire was used for waste disposal.	Complied
<b>Criterion 5.6:</b> Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			

Criterion / Indicator		Assessment Findings	Compliance												
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	<p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. The '<i>Pollution Identification Environmental Improvement Action Plan</i>' – is used to identify the waste products and sources of pollution is in place and is being reviewed accordingly. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1"> <thead> <tr> <th></th> <th>Receptors</th> <th>source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Source from boiler stack (smoke and particulate), vehicle &amp; generator (smoke and gases), anaerobic processes (ETP, EFB dumping – GHG emission</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro cyclone/clay bath /sterilizer condensate/clarification waste) &amp; boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>land</td> <td>Scheduled waste, domestic waste and industrial/process waste.</td> </tr> </tbody> </table>		Receptors	source	1	Air	Source from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping – GHG emission	2	Water	Cleaning water/run-off/process station waters (hydro cyclone/clay bath /sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	land	Scheduled waste, domestic waste and industrial/process waste.	Complied
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Criterion / Indicator		Assessment Findings	Compliance
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	<p>The <i>Pollution Identification Environmental Improvement Action Plan</i> identifies the waste products / sources of pollution and actions taken to mitigate and reduce them. The Plan is being reviewed accordingly.</p> <p>Green House Gaseous – Potential sources are being identified using 'Carbon Inventory Calculation Methodology'. Emission Sources have been identified from Land Conservation, Fertilizer (mineral), Manufacture &amp; Transport, NO from fertilizer, Fuel Consumption, Peat Oxidation, and POME and reported in the Palm GHG Summary Report.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance																																			
<p>5.6.3</p> <p>A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.</p> <p>- Minor compliance -</p>	<p>RSPO has made a compulsory for submitting GHG beginning 1/1/2017. All the Genting Plantations Mill/Estates audited had used RSPO Palm GHG v4.0 calculator as a tool. Records were maintained individually in the respective office. The final emissions value per product are as below:</p> <p>Genting Ayer Item Mill final emissions value per product are:</p> <table border="1" data-bbox="1028 587 1579 758"> <thead> <tr> <th></th> <th>Product</th> <th>tCO2e/t Product</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>CPO</td> <td>0.67</td> </tr> <tr> <td>2</td> <td>PK</td> <td>2.69</td> </tr> <tr> <td>3</td> <td>PKO</td> <td>NaN</td> </tr> <tr> <td>4</td> <td>PKE</td> <td>NaN</td> </tr> </tbody> </table> <p>Similarly the estates had the emission value summarised as follows;</p> <table border="1" data-bbox="1028 853 1747 1056"> <thead> <tr> <th>Estate</th> <th>Total emission tCO2e</th> <th>tCO2e/ha</th> <th>tCO2e/FFB</th> <th>Emission allocated to mill</th> </tr> </thead> <tbody> <tr> <td>GTE</td> <td>7335.11</td> <td>3.5</td> <td>0.23</td> <td>3316.14</td> </tr> <tr> <td>GKBE</td> <td>7422.23</td> <td>3.64</td> <td>0.17</td> <td>7266.04</td> </tr> <tr> <td>GSRE</td> <td>25991.07</td> <td>11.26</td> <td>0.54</td> <td>25535.89</td> </tr> </tbody> </table> <p>The high emission value from GSRE being having peat soil of 338.75 ha.</p>		Product	tCO2e/t Product	1	CPO	0.67	2	PK	2.69	3	PKO	NaN	4	PKE	NaN	Estate	Total emission tCO2e	tCO2e/ha	tCO2e/FFB	Emission allocated to mill	GTE	7335.11	3.5	0.23	3316.14	GKBE	7422.23	3.64	0.17	7266.04	GSRE	25991.07	11.26	0.54	25535.89	<p>Complied</p>
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**Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.**

**Criterion 6.1:**  
 Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.



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<p>6.1.1</p>	<p>A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -</p>	<p>GKBE: As per report sighted, RSPO Social Impact Assessment (SIA) Review Genting Kulai Besar Estate (GKBE) &amp; Kulai Besar North Division (KBND) 23<sup>rd</sup> – 28<sup>th</sup> January 2019; report prepared by Sustainability Manager dated 7/2/2019. Records of meetings also documented as following:</p> <ul style="list-style-type: none"> <li>- Report on External Stakeholder Consultation and Communication Meeting 2018; Report date: 19/10/2018</li> <li>- Report on Internal Stakeholder Consultation and Communication Meeting 2018; Report date: 14/9/2018</li> </ul> <p>GKBE: As per report sighted, RSPO Social Impact Assessment (SIA) Review Genting Ayer Item Oil Mill (GAIOM) &amp; Genting Sing Mah Estate (Div. of Sungei Rayat Estate) 16<sup>th</sup> -17<sup>th</sup> January 2019; report prepared by Sustainability Manager dated 28/1/2019. Records of meetings also documented as following:</p> <ul style="list-style-type: none"> <li>- Report on External Stakeholder Consultation and Communication Meeting 2018; Report date: 5/9/2018</li> <li>- Report on Internal Stakeholder Consultation and Communication Meeting 2018; Report date: 17/10/2018</li> </ul> <p>GSRE: As per report sighted, RSPO Social Impact Assessment (SIA) Review Genting Sungei Rayat Estate (GSRE) 10<sup>th</sup> -15<sup>th</sup> January 2019; report prepared by Sustainability Manager dated 28/1/2019. Records of meetings also documented as following:</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>- Report on External Stakeholder Consultation and Communication Meeting 1/2018; Report date: 5/9/2018</li> <li>- Report on Internal Stakeholder Consultation and Communication Meeting 1/2018; Report date: 14/9/2018</li> </ul> <p>GTBE:</p> <p>As per report sighted, RSPO Social Impact Assessment (SIA) and Human Rights Impact Assessment (HRIM) Report; Genting Tebong Estate (GTBE) 27<sup>th</sup> -29<sup>th</sup> December 2017; report prepared by Sustainability Department dated 29/12/2017. Records of meetings also documented as following:</p> <ul style="list-style-type: none"> <li>- Report on External Stakeholder Consultation and Communication Meeting; Report date: 17/12/2018</li> <li>- Report on Internal Stakeholder Consultation and Communication Meeting; Report date: 4/10/2017</li> </ul>	
6.1.2	<p>There shall be evidence that the assessment has been done with the participation of affected parties.</p> <p>- Major compliance -</p>	<p>As above, evidence available that the assessment has been done with participation pf affected parties.</p> <p>GKBE:</p> <p>Evidence available for participation of affected parties in external stakeholder meeting conducted on 11/10/2018 and internal stakeholder meeting conducted on 27/8/2018.</p> <p>GAIOM:</p> <p>Evidence available for participation of affected parties in external stakeholder meeting conducted on 28/8/2018 and internal stakeholder meeting conducted on 16/10/2018.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	For GAIOM, action plan/status last updated by GAIOM on 8/2/2019. GKBE also updated its plan on Feb 2019. For GKBE, action plans related to positive aspects could be elaborate further on matters relevant to involve local communities as mini contractor (estate operation) and to allow local farmers to use TNB rentice area.  For both GSRE & GTBE, it was found that plans for avoidance or mitigation of impacts related to absconded workers issues were not adequate.  This was based on the records of workers in 2018 shown a total of 22 & 25 absconded foreign workers in GSRE and GTBE respectively. External stakeholders consulted in GTBE complaining that few of those absconded workers even left big amounts of unpaid groceries debts. These absconded foreign workers issue might potentially lead to local and national social issues.  Hence, a major noncompliance has been raised.	Major nonconformance
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The plan reviewed on 2-year basis which was last done on February 2019 for mill and October 2018 for estates.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No smallholder involved in the certification unit.	Not applicable
<b>Criterion 6.2:</b> There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			

Criterion / Indicator		Assessment Findings	Compliance
6.2.1	<p>Consultation and communication procedures shall be documented.</p> <p>- Major compliance -</p>	<p>Procedure documented as Genting Plantations Berhad Sustainability Management Procedure Manual Title: Procedures for Consultation and Communication; Doc. # SMP-GPB-17; Rev. 02; Issue date: 23/2/2018.</p> <p>Records of communication sighted as following:</p> <ul style="list-style-type: none"> <li>- Genting Plantations Enquiry Register Book; Estate: Genting Kulai Besar Estate; latest communication ref. # 037; date: 12/2/2019; stakeholder (external): Pejabat Kesihatan Daerah Kulai</li> <li>- Genting Plantations Enquiry Register Book; Estate: Genting Kulai Besar Estate; latest communication ref. # 099; date: 8/2/2019; stakeholder (Internal): Siti Yusrina binti Aini</li> </ul>	Complied
6.2.2	<p>A management official responsible for these issues shall be nominated.</p> <p>- Minor compliance -</p>	<p>Nomination made based on operating units as per following samples:</p> <p>GKBE:</p> <p>Management officials appointed as Social and Risk Management Team among Estate Field Staffs i.e.:</p> <ul style="list-style-type: none"> <li>- Sasendran</li> <li>- Naavin</li> <li>- Ali Hamid</li> <li>- Mohd. Azemi</li> </ul> <p>GAIOM:</p> <p>Appointed as Social and Risk Management PIC i.e. Mohd. Adam Bin Mohd. Johari</p> <p>GSRE:</p> <p>Appointed as Social and Risk Management PIC i.e.:</p> <ul style="list-style-type: none"> <li>- M. Sathianata (Field Supervisor)</li> <li>- Mohd. Hamri Ahmad (Field Supervisor)</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	Stakeholder list was sighted and last updated on January 2019 where local communities, government authorities, internal workers, contractors and suppliers were included into the list.  Enquiry Register Book was implemented in the mill and estates. All the enquiries were recorded in the enquiry book. There was no any request from the stakeholders since last audit.	Complied
<b>Criterion 6.3:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	The system established based on Sustainability Management Procedure Manual Title: Complaints and Grievance; Doc. # SMP-GPB-19; Rev. 03; Issue date: 21/3/2018 and other relevant procedure including Procedure on Conflict Resolution and Handling of Negotiations and Compensation Within GENP Estates; Doc. # SMP-GPB-18; Rev. 03; Issue date: 29/3/2017	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	Both mill and estates has implemented Complaints/Grievances Record Book. Any complaints related to housing and workers issue were recorded in the complaint book. Linesite Maintenance Book was implemented as well to record any break down or malfunction in the workers’ quarters.	Complied
<b>Criterion 6.4:</b> Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			

Criterion / Indicator	Assessment Findings	Compliance
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	Complied

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6.4.3 The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	<p>Recently, there was a hand-over of land to smallholder whom had complained on 13/11/2018 (Complaints/Grievances Record Book Complaint Ref. # 148) when the he found that the estate had overplanted the oil palm tree during replanting of the area in OP1987G (OP2018D). Upon received of complaint, GSRE immediately conducted re-survey by GPRC team on the same day and the management found a total of 10 replanted palms had encroached into complainant's area.</p> <p>This was confirmed and agreed by complainants and GSRE took action by surrender back the land together with 10 replanted palm trees to the smallholder upon mutual agreement by both parties as per records of complaint. The issue was reported by the Estate Manager and noted by the General Manager. No further issue raise after that.</p>	Complied
<b>Criterion 6.5:</b> Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.		
6.5.1 Documentation of pay and conditions shall be available. - Major compliance -	<p>Documentation of pay and conditions available where harvesters and sprayers piece-rate prices were based on MAPA Circular # 46/2018; Date: 21/12/2018 where Genting Plantations Berhad established the following rates:</p> <p>Contracted FFB Harvesting Rate; Month Jan-19; CPO Price: RM 1,849.50 according to palm field yield bracket</p>	Complied

<p>6.5.2</p>	<p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -</p>	<p>Agreements with full details of payments and conditions of employment were provided and explained to workers based on interview with sample workers and records of following:</p> <p>GKBE Checkroll workers sample agreements:</p> <ul style="list-style-type: none"> <li>- Workers ID # 03130; Date joined: 8/1/2018; Post: Manuring Gang</li> <li>- Workers ID # 03068; Date joined: 2/6/2015; Post: Sprayer</li> <li>- Workers ID # 02989; Date joined: 16/5/2013; Post: Auxiliary Police</li> </ul> <p>GKBE Contractor workers sample agreements:</p> <ul style="list-style-type: none"> <li>- Workers ID # B 1568478; Date joined: 1/9/2016; Post: Harvester; Contractor: Vimesh Enterprise</li> <li>- Workers ID # B 2898254; Date joined: 8/11/2017; Post: Harvester; Contractor: Woon Nyong Kwee</li> </ul> <p>GAIOM Checkroll workers sample agreements:</p> <ul style="list-style-type: none"> <li>- Workers ID # 02923; Date joined: 25/11/2017; Post: Workshop Fitter</li> <li>- Workers ID # 2877F; Date joined: 29/4/2016; Post: General Worker (Process)</li> <li>- Workers ID # 2947F; Date joined: 10/12/2018; Post: General Worker (Process)</li> <li>- Workers ID # 00323; Date joined: 2/5/2018; Post: General Auxiliary Police</li> </ul> <p>GSRE Checkroll workers sample agreements:</p> <ul style="list-style-type: none"> <li>- Workers ID # 02845; Date joined: 26/7/2017; Post: Sprayer</li> <li>- Workers ID # 02863; Date joined: 25/1/2018; Post: General Worker (Absconded 1/11/2018)</li> </ul>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> <li>- Workers ID # 02863; Date joined: 4/5/2018; Post: Harvester (Absconded 1/11/2018)</li>   <li>GSRE Contractor workers sample agreements:               <ul style="list-style-type: none"> <li>- Workers ID # AT498533; Date joined: 2/6/2013; Post: Harvester; Contractor: Ong Shek Enterprise</li> <li>- Workers ID # B9968931; Date joined: 17/10/2018; Post: Harvester; Contractor: Koo Development Construction</li> <li>- Workers ID # B1573774; Date joined: 12/8/2017; Post: Harvester; Contractor: GJS Agrotech Enterprise</li> </ul> </li>   <li>GTBE Checkroll workers sample agreements:               <ul style="list-style-type: none"> <li>- Workers ID # 03608; Date joined: 1/10/2018; Post: General Worker</li> <li>- Workers ID # 02917; Date joined: 29/9/2019; Post: Harvester</li> <li>- Workers ID # AU318333; Date joined: 28/7/2018; Post: Harvester (Absconded 14/9/2018)</li> </ul> </li>   <li>GSRE Contractor workers sample agreements:               <ul style="list-style-type: none"> <li>- Workers ID # B2592206; Date joined: 14/6/2016; Post: Harvester; Contractor: Thavarajan Enterprise</li> <li>- Workers ID # AT942600; Date joined: 24/2/2017; Post: Harvester; Contractor: Hu Kim Soon Contractor</li> <li>- Workers ID # AT645048; Date joined: 21/5/2013; Post: Harvester; Contractor: Tey Thiam Hock</li> </ul> </li> </ul>	

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Criterion / Indicator		Assessment Findings	Compliance
6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –	Adequate housing, water supplies, medical, educational and welfare amenities provided accordingly. Assurance provided by management through monitoring as following:  GKBE:  Monitoring recorded in Line Site Inspection Book. Weekly inspection conducted, latest on 7/2/2019. Previous inspection done on 31/1/2019.  GAIOM:  Monitoring done by Production Executive recorded in Linesite Inspection Monitoring Book.	Complied
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food. - Minor compliance –	There were sundry shops found inside the mill and estates’ compound. Site visit to the shops found that prices are displayed at the items sold in the shops. Interview with the workers found that the pricing of the goods and foods are fair.	Complied
<b>Criterion 6.6:</b> The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	Genting Plantations Berhad has developed and implemented Social Policy dated 22/6/2015 and People Policy dated 3/8/2009 where the company respects the rights of the employees and workers to join or form legal trade unions of their own choosing and to bargain collectively. The policy was displayed on the notice board.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Workers representatives established as Workers Committee for 2018/2019 Genting Kulai Besar Estate and other estates. For sample, the following was sighted: GKBE:  Latest meeting conducted on 27/8/2018 attended by Chairman (Mandore) and representatives among workers including estate management.  GAIOM:  Latest meeting conducted on 16/10/2018 as per records of Internal Stakeholder Consultation and Communication & Worker Committee Meeting	Complied
<b>Criterion 6.7:</b> Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Genting Plantations Berhad has developed and implemented Social Policy dated 22/6/2015 and People Policy dated 3/8/2009 where the company does not employ any child labour. They respect the children's rights. Verified the LintraMax system and the Listing of Foreign Workers found all the workers recruited are above 18 years old.	Complied
<b>Criterion 6.8:</b> Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			

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Criterion / Indicator		Assessment Findings	Compliance
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	Genting Plantations Berhad has developed and implemented Social Policy dated 22/6/2015 and People Policy dated 3/8/2009 where the company does not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation. The policy was publicly displayed at the notice board at office area.	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Verified the LintraMax system and payslips found that the company has recruited male and female workers, local and foreign workers. They were treated equally without any discrimination. They were paid according to legal requirements. Interviewed with the female and male workers confirmed that they were allowed to transfer to other work stations if they found they are unfit for the job.	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	Genting Plantations Berhad has developed Manpower Recruitment and Orientation, Doc. No. PM-MR-02, Rev. 0 dated 2/1/2018. The procedure has clearly stated the selection of recruitment and hiring process, promotion of the employees internally before recruit for new employees. The recruitment was also based on the medical report for the fitness to work. For GAIOM, they have engaged with some external parties such as government agencies or universities to recruit the local people for internship or permanent job.	Complied
<b>Criterion 6.9:</b>			
There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	Genting Plantations Berhad has developed Sexual Harassment Policy dated 3/8/2009 where the company strives for a harassment-free environment and avoid behaviour that may create an atmosphere of hostility and intimidation of any kind at the workplace. The policy has been briefed to all the workers during induction training. Seen the induction training attendance list in GKBE where policy been communicated via meeting latest conducted on 27/3/2018.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	Social Policy dated 22/6/2015 was developed and implemented. The company will respect and protect the reproductive rights. The policy has been briefed to all the workers during induction training. Seen the induction training attendance list in GKBE where policy been communicated via meeting as per Minit Mesyuarat Jawatankuasa Wanita & Kanak-kanak Genting Ayer Item Oil Mill; Date: 11/1/2019.	Complied
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	Genting Plantations Berhad has developed Procedure on Prevention and Eradication of Sexual Harassment at the Workplace with Doc. No. SMP-GPB-20, Rev. 0 dated 11/10/2013. The procedure has clearly stated the forms of sexual harassment such as verbal, non verbal, visual, psychological and physical harassment.  Specific grievance investigations done through Women & Children Committee (Sexual Harassment) Organization Chart where Chief Clerk is the chairman and office clerk is the secretary.	Complied
<b>Criterion 6.10:</b>			
Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	There is no smallholder dealing with the palm oil mill. Pricing mechanism for FFB is not applicable because the FFB sourced is from own company estates.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	There is no smallholder dealing with the palm oil mill. Pricing mechanism for FFB is not applicable because the FFB sourced is from own company estates.  However, for harvesting contractor pricing, mechanisms were established as per Fresh Fruit Bunch (FFB) Harvesting Agreement as following samples:  - Contractor: Vimesh Enterprise; Agreement # GKBE/HAR/004/VE/019; Date: 1/1/2019  - Contractor: Woon Nyong Kwee; Agreement # GKBE/HAR/002/WNK/019; Date: 1/1/2019  The contract specified contractors to be in compliance with RSPO requirements included in Para 2.6 of both contracts.	Complied
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	Based on sample agreements of above indicator and the interview with contractor, the contractual agreements confirmed to be understood by all parties and fair, legal as well as transparent.	Complied
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	Agreed payments were made timely as per sample payments sighted:  - Contractor: Woon Nyong Kwee (18000148); Payment Voucher # 04439; Date: 4/2/2019 based on Contract Harvesting Completion (SOWC) for Year 2019, Month 1  - Contractor: Vimesh Enterprise (18000806); Payment Voucher # 04441; Date: 4/2/2019 based on Contract Harvesting Completion (SOWC) for Year 2019, Month 1	Complied
<b>Criterion 6.11:</b> Growers and millers contribute to local sustainable development where appropriate.			

Criterion / Indicator	Assessment Findings	Compliance
6.11.1 Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	Contributions made based on consultation with relevant stakeholders as per following sample: GKBE: - Contributions to program by Persatuan Bomba Kulai; Dated 18/8/2018 GAIOM: - Contributions to Kampung Seri Maju Jaya through Genting Prelove Day 2018; Dated 8/4/2018 - Contributions of Projector to Sekolah Kebangsaan Seri Maju Jaya; Dated 29/7/2018 - GAIOM Family Day; Dated 1/5/2018 - Kenduri Kilang 2018; 14/7/2018 - Sumbangan limau CNY 2109; 4/2/2019 GSRE: - Contributions to Program Gotong-royong Balai Raya Kampung Seri Teluk Parit Yaani; Dated 4/1/2019; Enquiry Register Book Ref. # 102 Donations of 100 pcs decorations flowers to SJK (C) York Chai; Dated 12/2/2019	Complied
6.11.2 Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	No scheme smallholders involved in the certification unit.	Not applicable
<b>Criterion 6.12:</b> No forms of forced or trafficked labour are used.		

Criterion / Indicator		Assessment Findings	Compliance
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	The company has recruited all the employees with legal identification for local and valid passport and work permit for foreign workers and contract workers. Contract of employment was signed by the workers prior to work.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance -	Verified documents and interviewe with the foreign workers from Indonesia, India, Bangladesh, Nepal and Pakistan confirmed that no contract substitution has occurred. The terms and conditions stated in the agreement they signed in home country were the same as they signed in Genting Plantations Berhad.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Genting Plantations Berhad has developed Procedures for Social Management, Doc. No. SMP-GPB-32, Rev. 0, dated 18/1/2018. The procedure has clearly outlined the practices of the company such as no contract of substitution for the foreign workers, provide reasonable and safe living condition to all the employees, post arrival orientation will be provided to brief on terms and conditions, safety & health, national and state laws and regulations and no discrimination to all the workers.	Complied
<b>Criterion 6.13:</b> Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	Genting Plantations Berhad has developed Social Policy dated 22/6/2015 where the company respect and support the Universal Declaration of Human Rights. The policy has been briefed to all the workers during induction training. Seen the induction training attendance list. Interviewed with the workers confirmed that they were respected by the company.	Complied



Criterion / Indicator		Assessment Findings	Compliance
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Not applicable for Peninsular Malaysia.	Complied
<b>Principle 7: Responsible development of new plantings</b>			
Genting Ayer Item Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance assessment. The immature areas are replanted area.			
<b>Principle 8: Commitment to continual improvement in key areas of activity</b>			
<b>Criterion 8.1:</b> Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			

Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of pesticides(Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);               <ul style="list-style-type: none"> <li>• Optimising the yield of the supply base.</li> </ul> </li> </ul> <p>- Major compliance -</p>	<p>Example of continuous improvement plan verified against budget at GAIOM certification unit are:</p> <ul style="list-style-type: none"> <li>• Fire Protection and Fighting Facilities</li> <li>• New 45t boiler</li> <li>• Roof replacement and upgrading at mill</li> <li>• Buildings – Residential and others</li> <li>• New Mechanised Loose Fruit Collector</li> <li>• Road and Bridges</li> <li>• Office equipment</li> </ul>	<p>Complied</p>

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**Appendix B: Approved Time Bound Plan**

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

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

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of 23 July 2018	Any unresolved non-compliances
25	PT Susantri Permai (95%)	Puroh Estate Masaha Estate Zircon Hill Estate	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia	Oct, 2022		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		SP Plasma		Oct, 2023		
26	PT Kapuas Maju Jaya (95%)	Waterfall Estate I & II Muhun Estate I & II Talawang Estate I & II	Supply bases for Golden Hill Oil Mill, Kalimantan Indonesia	Oct,2022		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		KMJ Plasma		Oct, 2023		
27	PT Dwie Warna Karya ( 95%)	Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate		Oct , 2022		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		DWK Plasma		Oct, 2023		
28	PT Citra Sawit Cemerlang (70%)	CSC Estates	Supply base for CSC Oil Mill*	Oct,2021		In process of obtaining HGU.
29	PT Surya Agro Palma (70%)	SAP Estate 1&2 SAP Estate 3&4 SAP Estate 5&6	Supply base for SAP Oil Mill*	Oct, 2020		In process of obtaining HGU.
30	PT Agro Abadi Cemerlang (70%)	AAC 1 & 2				NPP In Progress. HCV report being reviewed at HCVRN.
		AAC 3 & 4				
31	PT Palma Agro Lestari Jaya (70%)	PALJ Estates	Supply base for PALJ Oil Mill*	Aug,2023		NPP In Progress. HCV report under review by HCVRN.
		PALJ Plasma				
32	Knowledge One Investment Pte Ltd ( 85%)-PT Kharisma Inti Usaha ( KIU)	KIU 1 & 2 KIU 3 & 4	Supply base for KIU Oil Mill	July, 2019		In progress to engage consultants to carry out assessments as per NPP requirements.
		KIU Plasma		July 2022		

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

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*\*Oil Mill planned for construction*

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

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

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

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

**Appendix C: GHG Reporting Executive Summary**

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

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

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

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.67
PKO	2.69

Extraction	%
OER	20.23
KER	5.06

Production	t/yr
FFB Process	196,457.65
CPO Produced	39,744.04
PKO Produced	9,948.08

Land Use	Ha
OP Planted Area	11,335.10
OP Planted on peat	338.75
Conservation (forested)	-
Conservation (non-forested)	153.66
<b>Total</b>	<b>11,827.51</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	78,887.65	0.37	-	-	-	-	78,887.65	0.37
CO <sub>2</sub> Emission from fertilizer	9,700.32	0.04	-	-	-	-	9,700.32	0.04
NO <sub>2</sub> Emmision	10,085.97	0.04	-	-	-	-	10,085.97	0.04
Fuel Consumption	1,669.53	0.01	-	-	-	-	1,669.53	0.01
Peat Oxidation	18,339.05	0.07	-	-	-	-	18,339.05	0.07
<b>Sink</b>								
Crop Sequestration	-72,478.26	-0.33	-	-	-	-	-72,478.26	-0.33
Conservation Sequestration	-	-	-	-	-	-	-	-
<b>Total</b>	<b>46,194.26</b>	<b>0.20</b>	-	-	-	-	<b>46,194.26</b>	<b>0.20</b>

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*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	22,561.46	0.09
Fuel Consumption	446.10	-
Grid Electricity Utilisation	221.08	-
<b>Credit</b>		
Export of Grid Electricity	-	-
Sales of PKS	-	-
Sales of EFB	-	-
<b>Total</b>	<b>21,228.64</b>	<b>0.09</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	13,707.90
PK from other source	-
Fuel Consumptions	-
<b>Total Crusher emissions</b>	<b>-</b>

\*This mill has no kernel crusher operation.

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

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



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

<b>5.1 Applicability of the general chain of custody requirements for the supply chain</b>			
	<b>Requirement</b>	<b>Evidence</b> For any N/A raised, justification is required.	<b>Compliance</b> (Yes / No or N/A)
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Genting Ayer Item Oil Mill has the physically handle the RSPO Certified Sustainable oil palm products. All trading, contract and sales are managed by Marketing Palm Product Department, HQ and held the palmTrace registration number for respective mill (Genting Ayer Item Oil Mill: RSPO_PO1000002439)	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	GAIOM is not a trader or distributor.	Yes
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	Genting Plantations Bhd held RSPO membership number: 1-0086-06-000-00 since 14 November 2006. Company has registered in palmTrace system as follows: Members ID – Genting Ayer Item Oil Mill : RSPO_PO1000002439 Licence valid until 25/3/2019 Member category : Oil Mill	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	Processing aids was not in used at Genting Ayer Item Oil Mill.	Yes
<b>5.2 Supply chain model</b>			

5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	Genting Ayer Item oil Mill Model: Identity Preserved. The management has established the SOP for Supply Chain and Traceability (Mill), SMP-GPB-23, Revision:02, Dated 18/1/2018 which covered unique running batch number, supply chain model (IP), training, persons responsible, registration and reporting requirements, handling of noncertified product, RSPO stamps (IP), authorization, delivery/goods received. During the period of Jan 18-Jan 19, GAIOM has received and processed FFB from own plantations/estates: 196,457.65 mt.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Genting Ayer Item Oil Mill was certified with Identity Preserved Module	Yes
<b>5.3. Documented Procedures</b>			
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> </ul>	GAIOM implemented the supply chain program based on Sustainability Management Procedure Manual as per following: <ul style="list-style-type: none"> <li>- Sustainability Management Procedure Manual Title: Traceability (Estate); Doc. # SMP-GPB-09; Rev. 02; Issue date: 14/8/2014</li> <li>- Sustainability Management Procedure Manual Title: Supply Chain and Traceability (Mill); Doc. # SMP-GPB-23; Rev. 06; Issue date: 18/1/2018.</li> </ul> <p>The procedure was prepared by Sustainability Unit and approved by Sustainability Chairman which covering the implementation of all supply chain requirements.</p>	Yes
	<ul style="list-style-type: none"> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>	Up-to-date records available including the following: <ul style="list-style-type: none"> <li>- Genting Ayer Item Oil Mill Daily Production Figure For 10/2/2019; LintraMax Mill Director; Printed on 11/2/2019</li> <li>- Factory Crop Intake and Production Statement (Monthly) 31/12/2019 FFB; 2/1/2019</li> </ul>	Yes

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		<ul style="list-style-type: none"> <li>- Stock and Despatch Statement (Monthly) for – CPO 31/12/2019 FFB; ADB-ACC 2; 2/1/2019</li> <li>- Stock and Despatch Statement (Monthly) for PK 31/12/2019 PK; 2/1/2019</li> <li>- 2018 Summary of Monthly Statement</li> <li>- Certified CPO sales contract</li> <li>- Certified PK sales contract</li> <li>- Despatch records</li> <li>- Identity Preserved (IP) Worksheet – Monthly Input; ISCC, RSPO and MSPO Sustainable Products – Monthly Movement Summary Report (CPO); Appendix X (Version 5, GAIOM: 18/8/2018</li> <li>- Identity Preserved (IP) Worksheet – Monthly Input; ISCC, RSPO and MSPO Sustainable Products – Monthly Movement Summary Report (PK); Appendix X (Version 5, GAIOM: 18/8/2018</li> </ul> <p>Jan – Dec 2018:</p> <ul style="list-style-type: none"> <li>- Total FFB received: 196,457.65 mt</li> <li>Total FFB processed: 196,442.93 mt</li> <li>Total CPO produced: 39,744.04 mt</li> <li>Total PK produced: 9,948.08 mt</li> <li>Total CPO despatched:</li> <li>Total PK despatched:</li> </ul> <p>Total CSPO sales contract: 12,491.49 mt          Total conventional CPO sales contract: 7,091.13 mt          Total CPO despatch: 19,582.62 mt          Balance CPO: 870.95 mt</p> <p>Total PK production: 3,006.00 mt          Total CSPK sales contract: 2,092.10 mt</p>	
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		Total conventional PK sales contract: 926.55 mt Total PK sales despatch: 3,018.65 mt Balance PK: 73.95 mt	
	<ul style="list-style-type: none"> <li>• Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard.</li> </ul>	<p>The procedure also specified the RSPO Chairman shall have the overall responsibility for the implementation of the procedure with assignment of relevant personnel from various departments to assist in the implementation. Sighted the Letter of Appointment as Person In-Charge for Supply Chain, Traceability and Identity Preserved (IP) requirements of RSPO, ISCC and MSPO Sustainability Standards; Date: 19/11/2015. Sighted also the</p> <p>The appointment letter from the SVP-Group Processing dated 1/9/2017 mentioned that Mill Manager as the management representative for RSPO at Genting Ayer Item Oil Mill.</p> <p>Roles and responsibility for RSPO Supply Chain team were clearly defined in the appointment letter.</p>	Yes
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<p>Written procedure available as Procedure Manual Title: Internal Audit; Doc. # PM-IA-01; Rev. 00; Issue date: 2/1/2018 and Sustainability Management Procedure Manual Title: Sustainability Internal Audit; Doc. # SMP-GPB-03; Rev. 02; Issue date: 21/3/2018. Internal audit conducted on 13-14 December 2018 by Sustainability Manager (P. Sivaji Raja) as per RSPO &amp; MSPO Internal Audit Report dated 18/12/2018.</p> <p>Palmtrace managed by Marketing Palm Products (MPP) Department of HQ in KL.</p>	Yes
	ii) effectively implements and maintains the standard requirements within its organization	Total findings 8 Major & 1 Minor for RSPO P&C & MSPO Part 4.	Yes
<b>5.4. Purchasing and goods in</b>			

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5.4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit.</p> <p>Genting Ayer Item POM has system to verify at the weighbridge. Genting Ayer Item POM only received FFB from own estate. Sighted sampled as following:</p> <ol style="list-style-type: none"> <li>1. Genting Sungei Rayat Estate  Despatch Note: FFB18001029W  Weighbridge Ticket: FFB18005246W  Date: 30/6/2018  Field: P07C-SRTG  Tonnage: 19.31 mt  Transporter: JSK6619</li> <li>2. Genting Tebong Estate  Despatch Note: FFBR18002060W  Weighbridge Ticket: FFB18006091W  Date: 31/7/2018  Field: P02B-TBRP  Tonnage: 39.99 mt  Transporter: SS541E</li> </ol>	Yes
	<ul style="list-style-type: none"> <li>• 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).</li> </ul>	<p>The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit.</p>	Yes
	<ul style="list-style-type: none"> <li>• The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall</li> </ul>	<p>The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit.</p>	Yes

	include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.		
	<ul style="list-style-type: none"> <li>A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (<a href="http://www.rspo.org">www.rspo.org</a>) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.</li> </ul>	The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit.	Yes
	<ul style="list-style-type: none"> <li>The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements.</li> </ul>	Not applicable.	N/A
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Mechanism in place for handling nonconforming oil palm products and/or documents was describe in the procedure available. No non-conforming products recorded since last audit.	Yes
<b>5.5. Outsourcing activities</b>			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independemnt mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	<p>Outsourcing only applicable for CPO despatch based on the delivered contract with buyers. No outsourcing for PK despatch that have ex-mill contracts with buyers. Sighted the contract agreement as following:</p> <ul style="list-style-type: none"> <li>- CPO Transport Agreement between Genting Oil Mill Sdn. Bhd. And Makmur Transport Sdn. Bhd. Dated 1/3/2018</li> <li>- CPO Transport Agreement between Genting Oil Mill Sdn. Bhd. And Teo Tuan Kwee Sdn. Bhd. Dated 1/1/2016</li> </ul> <p>Both contracts have been included with addendum of CPO &amp; PK Transport Agreement Addendum on RSPO, MSPO, ISCC &amp; OSHA 1994 as per memorandum dated 30/1/2019 from SVP Processing &amp; Downstream Manufacturing.</p>	Yes

5.5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a. The site has legal ownership of all input material to be included in outsourced processes;	Not applicable. No outsourcing activity.	N/A
	b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.	Not applicable. No outsourcing activity.	N/A
	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	Not applicable. No outsourcing activity.	N/A
	d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.	Not applicable. No outsourcing activity.	N/A
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Not applicable. No outsourcing activity.	N/A
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	Not applicable. No outsourcing activity.	N/A
<b>5.6. Sales and goods out</b>			
5.6.1	The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form. <ul style="list-style-type: none"> <li>The name and address of the buyer;</li> </ul>	CPO agreement and delivery samples: 1) Seller: Genting Oil Mill Sdn. Bhd.; Buyer: Mewaholeo Industries Sdn. Bhd.; Contract # SMW/0518/A01CPO; Date:	Yes

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	<ul style="list-style-type: none"> <li>• The name and address of the seller;</li> <li>• The loading or shipment/ delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>6/4/2018; Commodity: RSPO SG Crude Palm Oil; Quantity: 2,000.00 mt. Sample despatch tickets:</p> <ul style="list-style-type: none"> <li>- Despatch ticket # CPOSG18000050W; Date: 10/5/2018; Tanker # JSJ7530/T/NA998; Nett weight: 42.07mt; Cert. # RSPO 653474; e-trace # TR-b6404b1f-0e42; Buyers GRN # R0569549</li> <li>- Despatch ticket # CPOSG18000049W; Date: 8/5/2018; Tanker # MAH9316/TM1761; Nett weight: 35.75mt; Cert. # RSPO 653474; e-trace # TR-b6404b1f-0e42; Buyers GRN # R0569476</li> </ul> <p>2) Seller: Genting Oil Mill Sdn. Bhd.; Buyer: Intercontinental Specialty Fats Sdn. Bhd.; Contract # SMW/0518/A03CPO; Date: 27/4/2018; Commodity: RSPO IP Crude Palm Oil; Quantity: 1,000.00 mt.; Sample despatch tickets:</p> <ul style="list-style-type: none"> <li>- Despatch ticket # CPOIP18000032W; Date: 8/5/2018; Tanker # JKC7424/T/N9998; Nett weight: 39.66mt; Cert. # RSPO 653474; e-trace # TR-b6404b1f-0e42; Buyers GRN # R0352298</li> <li>- Despatch ticket # CPOIP18000031W; Date: 8/5/2018; Tanker # JHC5031/T/WB5003; Nett weight: 34.64mt; Cert. # RSPO 653474; e-trace # TR-b6404b1f-0e42; Buyers GRN # R0352287</li> </ul> <p>PK agreement and delivery sample:</p> <p>1) Seller: Genting Oil Mill Sdn. Bhd.; Buyer: PGEO Oil Mill Sdn. Bhd.; Contract # SMW/0518/A01PK; Date: 23/4/2018; Commodity: RSPO IP Palm Kernel; Quantity: 400.00 mt.; Sample despatch tickets:</p>	
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		<ul style="list-style-type: none"> <li>- Despatch ticket # PKIP18000029W; Date: 19/5/2018; Tanker # JML3222/T/WB4809; Nett weight: 30.94mt; Cert. # RSPO 653474; e-trace # TR-b6404b1f-0e42; Buyers Collection Order # PGR-PK38770</li> <li>- Despatch ticket # PKIP18000030W; Date: 21/5/2018; Tanker # JLT277/T/JJ4641; Nett weight: 38.92mt; Cert. # RSPO 653474; e-trace # TR-b6404b1f-0e42; Buyers Collection Order # PGR-PK-38797</li> <li>2) Seller: Genting Oil Mill Sdn. Bhd.; Buyer: Unitata Berhad; Contract # SMW/0918/A02PK; Date: 13/9/2018; Commodity: RSPO SG Palm Kernel; Quantity: 435.00 mt.; Sample despatch tickets:</li> <li>- Despatch ticket # PKSG18000012W; Date: 17/10/2018; Tanker # MCY9981/T/AA1448; Nett weight: 32.43mt; Cert. # RSPO 653474; e-trace # TR-b6404b1f-0e42; Buyers Collection Order # 53882</li> <li>- Despatch ticket # PKSG18000010W; Date: 15/10/2018; Tanker # DAX7717/T/D1152; Nett weight: 40.10mt; Cert. # RSPO 653474; e-trace # TR-b6404b1f-0e42; Buyers Collection Order # 53857</li> </ul>	
	<ul style="list-style-type: none"> <li>• 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).</li> </ul>	<p>A complete and detail informations were presented in the transaction documents as above.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> <li>• For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per</li> </ul>	<p>Announcement registered in PalmTrace system by the HQ Sales Department personnel. Based on PalmTrace transaction report, there were multiple (as per appendix) shipping announcements of both CSPO and CSPK made since the last assessment.</p>	<p>Yes</p>

	shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.		
<b>5.7. Registration of transactions</b>			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>are mills, traders, crushers and refineries and;</li> <li>take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	The registration of PalmTrace was carried out by the HQ Sales Department based in KL. All transactions were registered accordingly in the PalmTrace.	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> <li>Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</li> </ul>	Based on the announcement summary, all the registrations were found to be in order.	Yes
	<ul style="list-style-type: none"> <li>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</li> </ul>	Not applicable. Products are not sold beyond refinery.	N/A
	<ul style="list-style-type: none"> <li>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> </ul>	Based on the accounting (Mass Balance Allocation Sheet), the removal of volumes was done correctly when the products were sold as conventional.	

	<ul style="list-style-type: none"> <li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>	Based on the announcement summary, all the confirmations were found to be in order.	
<b>5.8. Training</b>			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Sustainability training plan & records for year 2018 and 2019 sighted available during the audit. Last training for supply chain was conducted on 18/9/2017 by sustainability team at GAIOM. Interview with w/bridge operator shows that he understand on the requirement of RSPO Supply Chain standard requirements.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	Sustainability training plan & records for year 2018 and 2019 sighted available during the audit. Last training for supply chain was conducted on 18/9/2017 by sustainability team at GAIOM. Interview with w/bridge operator shows that he understand on the requirement of RSPO Supply Chain standard requirements.	Yes
<b>5.9. Record Keeping</b>			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	GAIOM has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	Yes
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	All relevant records related to supply chain available since at least past 2 years. Current records shown positive stock was reported as of the record dated 31/1/2019 for CPO = 3,653.45 mt.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	The forecast volume for 2019: CSPO = 13,424.70 mt CSPK = 3,601.75 mt	Yes
<b>5.10. Conversion factors</b>			

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5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Conversion factor of CPO and PK production is depending on the actual OER and KER. Previous period under review's average were reported in earlier section of this report.	Yes
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Yes
<b>5.11. Claims</b>			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Yes
<b>General corporate communications</b>			
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.	No "off-product" claim made made by GAIOM in the industry public domain.	Yes
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address ( <a href="http://www.rspo.org">www.rspo.org</a> ) 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.	Not applicable.	Yes

	Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rsपो.org' where the link must lead to the member's profile page.		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable.	Yes
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable.	Yes
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Not applicable.	Yes
<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 were made through the CSPO and CSPK trading contractual and transactions documentations between the mill and buyers. No further communications made by GAIOM for its raw products beyond its refinery and oleochemical plants buyers.	Yes
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Not applicable.	N/A
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: 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	Not applicable.	N/A

	<p>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.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	Not applicable.	N/A
<b>Business to consumer communication</b>			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.</p>	Not applicable.	N/A
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	Not applicable.	N/A
6.3	<p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p>	Not applicable.	N/A

6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not applicable.	N/A
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	Not applicable.	N/A
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Not applicable.	N/A
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Not applicable.	N/A
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a> .	Not applicable.	N/A
<b>5.12. Complaints</b>			

5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	The company has established Handling of Customer Feedback/ Complaints procedure, Doc. No. PM-MKT-05 dated 2/1/2018 where the procedure has defined the actions and responsibilities of the management to handle customer complaints to ensure no	Yes
<b>5.13. Management Review</b>			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	Based on Sustainability Management Procedure Manual; Doc. # SMP-GPB-06; Rev. 00; Issue date: 1/8/2013 and Procedure Manual Title: Management Review; Doc. # PM-MR-01; Rev. 00; Issue date: 2/1/2018 to conduct review at least once a year.	Yes
5.13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>	<p>Management review meeting was conducted on 14/1/2019 as per minutes of meeting 2<sup>nd</sup> RSPO &amp; MSPO Management Review Minutes (Southern Region) Genting Plantations Berhad. Agenda included the following (Para 13. Supply Chain and Traceability):</p> <ul style="list-style-type: none"> <li>- Results of internal audit – no findings</li> <li>- Customer feedback – no complaints</li> <li>- Preventive and corrective – no issues</li> <li>- Follow up – no issues</li> <li>- No changes</li> <li>- Recommendation – to use new agreement for contractual</li> </ul>	Yes
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>	Included in agenda 9 – Resource and training requirements – no issues.	Yes



**Appendix E: CPO Mill Supply Chain Assessment Report (Module D - CPO Mills: Identity Preserved)**

<b>D.1 Definition</b>			
	<b>Requirement</b>	<b>Evidence</b> For any N/A raised, justification is required.	<b>Compliance</b> (Yes / No or N/A)
D.1.1	A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. 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 Module E is applicable.	Genting Ayer Item Oil Mill received only certified FFB from 5 certified estate. Therefore qualifies for the Identity Preserved supply chain system and module.  During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products	Yes
<b>D.2 Explanation</b>			
D.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed	The forecast volume for 2019: CSPO = 13,424.70 mt CSPK = 3,601.75 mt	Yes

	to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.		
D.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	Genting Plantations Bhd held RSPO membership number: 1-0086-06-000-00 since 14 November 2006. Company has registered in palmTrace system as follows: Members ID – Genting Ayer Item Oil Mill : RSPO_PO1000002439 Licence valid until 25/3/2019 Member category : Oil Mill	Yes
<b>D.3 Documented procedures</b>			
D.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a. Complete and up to date procedures covering the implementation of all the elements in these requirements;	GAIOM implemented the supply chain program based on Sustainability Management Procedure Manual as per following: - Sustainability Management Procedure Manual Title: Traceability (Estate); Doc. # SMP-GPB-09; Rev. 02; Issue date: 14/8/2014 - Sustainability Management Procedure Manual Title: Supply Chain and Traceability (Mill); Doc. # SMP-GPB-23; Rev. 06; Issue date: 18/1/2018.  The procedure was prepared by Sustainability Unit and approved by Sustainability Chairman which covering the implementation of all supply chain requirements.	Yes
	b. 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 site’s procedures for the implementation of this standard.	The procedure also specified the RSPO Chairman shall have the overall responsibility for the implementation of the procedure with assignment of relevant personnel from various departments to assist in the implementation. Sighted the Letter of Appointment as Person In-Charge for Supply Chain, Traceability and Identity Preserved (IP) requirements of RSPO,	Yes

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		<p>ISCC and MSPO Sustainability Standards; Date: 19/11/2015. Sighted also the</p> <p>The appointment letter from the SVP-Group Processing dated 1/9/2017 mentioned that Mill Manager as the management representative for RSPO at Genting Ayer Item Oil Mill.</p> <p>Roles and responsibility for RSPO Supply Chain team were clearly defined in the appointment letter.</p>	
D.3.2	The site shall have documented procedures for receiving and processing certified FFBS.	<p>GAIOM implemented the supply chain program based on Sustainability Management Procedure Manual as per following:</p> <ul style="list-style-type: none"> <li>- Sustainability Management Procedure Manual Title: Traceability (Estate); Doc. # SMP-GPB-09; Rev. 02; Issue date: 14/8/2014</li> <li>- Sustainability Management Procedure Manual Title: Supply Chain and Traceability (Mill); Doc. # SMP-GPB-23; Rev. 06; Issue date: 18/1/2018.</li> </ul> <p>The procedure was prepared by Sustainability Unit and approved by Sustainability Chairman which covering the implementation of all supply chain requirements.</p>	Yes
<b>D.4 Purchasing and goods in</b>			
D.4.1	The site shall verify and document the tonnage and sources of certified FFBS received.	<p>The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit.</p> <p>Genting Ayer Item POM has system to verify at the weighbridge. Genting Ayer Item POM only received FFB from own estate. Sighted sampled as following:</p> <p>3. Genting Sungei Rayat Estate</p>	Yes

		<p>Despatch Note: FFB18001029W          Weighbridge Ticket: FFB18005246W          Date: 30/6/2018          Field: P07C-SRTG          Tonnage: 19.31 mt          Transporter: JSK6619</p> <p>4. Genting Tebong Estate          Despatch Note: FFBR18002060W          Weighbridge Ticket: FFB18006091W          Date: 31/7/2018          Field: P02B-TBRP          Tonnage: 39.99 mt          Transporter: SS541E</p>	
D.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The facilities aware of the procedure to inform CB immediately as written in the documented procedure of Supply Chain.	Yes
<b>D.5 Record keeping</b>			
D.5.1	<p>The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p><i>IP Mill must report on real time basis.</i></p>	<p>Up-to-date records available including the following:</p> <ul style="list-style-type: none"> <li>- Genting Ayer Item Oil Mill Daily Production Figure For 10/2/2019; LintraMax Mill Director; Printed on 11/2/2019</li> <li>- Factory Crop Intake and Production Statement (Monthly) 31/12/2019 FFB; 2/1/2019</li> <li>- Stock and Despatch Statement (Monthly) for – CPO 31/12/2019 FFB; ADB-ACC 2; 2/1/2019</li> <li>- Stock and Despatch Statement (Monthly) for PK 31/12/2019 PK; 2/1/2019</li> <li>- 2018 Summary of Monthly Statement</li> <li>- Certified CPO sales contract</li> <li>- Certified PK sales contract</li> <li>- Despatch records</li> </ul>	Yes

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		<ul style="list-style-type: none"> <li>- Identity Preserved (IP) Worksheet – Monthly Input; ISCC, RSPO and MSPO Sustainable Products – Monthly Movement Summary Report (CPO); Appendix X (Version 5, GAIOM: 18/8/2018</li> <li>- Identity Preserved (IP) Worksheet – Monthly Input; ISCC, RSPO and MSPO Sustainable Products – Monthly Movement Summary Report (PK); Appendix X (Version 5, GAIOM: 18/8/2018</li> </ul> <p>Jan – Dec 2018:</p> <ul style="list-style-type: none"> <li>- Total FFB received: 196,457.65 mt</li> <li>Total FFB processed: 196,442.93 mt</li> <li>Total CPO produced: 39,744.04 mt</li> <li>Total PK produced: 9,948.08 mt</li> <li>Total CPO despatched:</li> <li>Total PK despatched:</li> </ul> <p>Total CSPO sales contract: 12,491.49 mt          Total conventional CPO sales contract: 7,091.13 mt          Total CPO despatch: 19,582.62 mt          Balance CPO: 870.95 mt</p> <p>Total PK production: 3,006.00 mt          Total CSPK sales contract: 2,092.10 mt          Total conventional PK sales contract: 926.55 mt          Total PK sales despatch: 3,018.65 mt          Balance PK: 73.95 mt</p>	
<b>D.6 Processing</b>			

D.6.1	The site 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 product including during transport and storage to strive for 100% separation.	During this assessment it was confirmed that only certified source of FFB from own plantation is processed. This ensures that there is no possibility of mixing during processing. No noncertified FFB received.	Yes
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**Supply Chain Declaration** *(Applicable For Appendix E)*

<b>A. 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 bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	Mar-18	16,772.00	0	16,772.00
2	Apr-18	11,334.60	0	11,334.60
3	May-18	15,644.21	0	15,644.21
4	Jun-18	13,572.95	0	13,572.95
5	Jul-18	14,762.65	0	14,762.65
6	Aug-18	16,285.37	0	16,285.37
7	Sep-18	18,695.76	0	18,695.76
8	Oct-18	19,723.23	0	19,723.23
9	Nov-18	18,923.18	0	18,923.18
10	Dec-18	18,457.75	0	18,457.75
11	Jan-19	17,580.18	0	17,580.18
12	Feb-19	14,705.77	0	14,705.77
	<b>Total</b>	<b>196,457.65</b>	<b>0</b>	<b>196,457.65</b>

<b>B. 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	Jan-18	3,327.112	865.671
2	Feb-18	2,998.854	746.764
3	Mar-18	3,451.730	865.063
4	Apr-18	2,215.763	565.519
5	May-18	3,056.111	790.831
6	Jun-18	2,828.562	703.880
7	Jul-18	2,995.292	734.697
8	Aug-18	3,417.329	848.843
9	Sep-18	3,830.959	958.090
10	Oct-18	4,018.547	1,009.813
11	Nov-18	3,824.701	972.291
12	Dec-18	3,779.082	886.614
	<b>Total</b>	<b>39,744.042</b>	<b>9,948.076</b>

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<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	A	RSPO_PO10000001XX	1,637.27	
2	B	RSPO_PO10000001XX	521.50	
3	C	RSPO_PO10000046XX	2,698.46	
4	D	RSPO_PO10000001XX	12,069.55	
5	E	RSPO_PO10000001XX	15,745.68	
6	F	RSPO_PO10000000XX	495.08	
7	G	RSPO_PO10000019XX	898.88	
8	H	RSPO_PO10000029XX		5,999.23
9	I	RSPO_PO10000066XX		99.96
10	J	RSPO_PO10000000XX		1483.90
		<b>TOTAL</b>	<b>34,066.42</b>	<b>7,583.09</b>

<b>D. Records of CPO &amp; PK Sold under other schemes to Buyers since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	K	ISCC	999.75	0
		<b>TOTAL</b>	<b>999.75</b>	<b>0</b>

<b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (if any)</b>				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	L	199.18		
2	M	496.62		
3	N	898.32		
4	O	1801.53		
5	P	501.28		
6	Q			2090.56
7	R			200.82
		<b>TOTAL</b>	<b>3,896.93</b>	<b>2,291.38</b>



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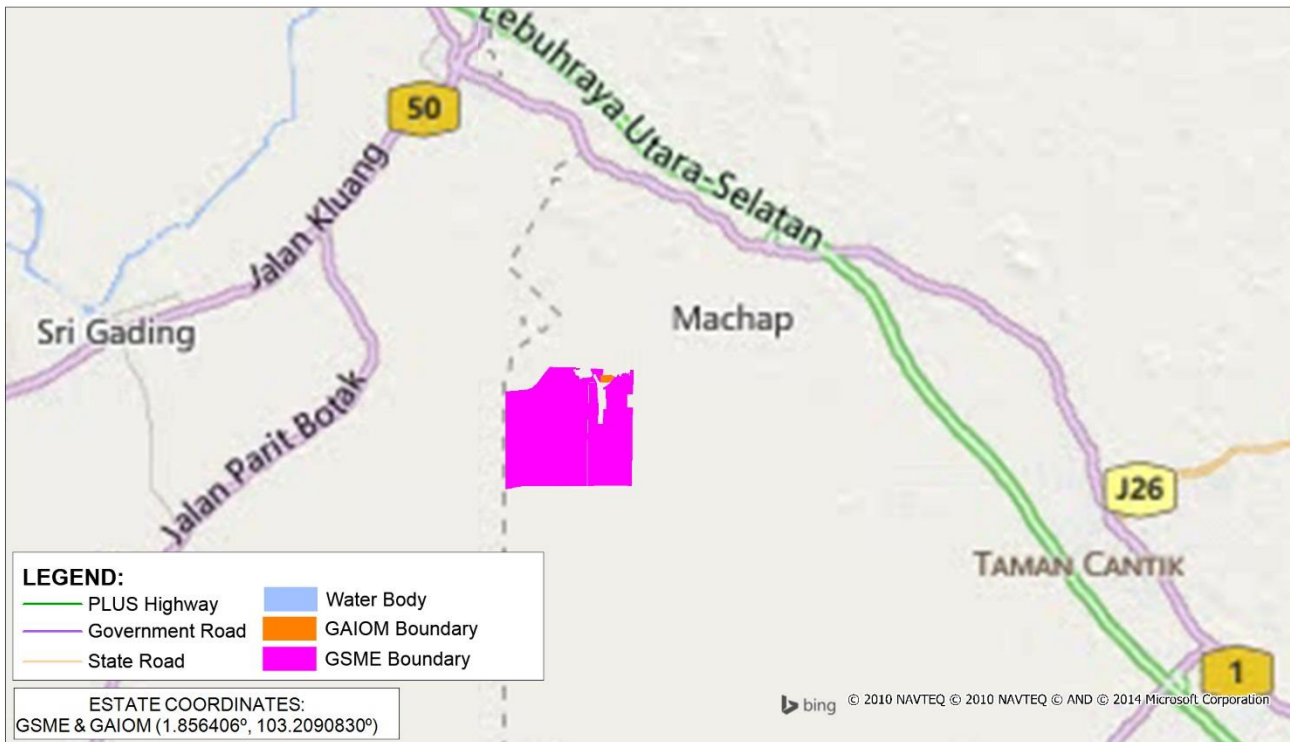
<b>F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>PalmTrace Trading License Number</b>	<b>RSPO Credits of Certified CPO Sold (mt)</b>
Nil	N/A	N/A	N/A

**Appendix F: Location Map of Genting Ayer Item Oil Mill Certification Unit and Supply bases**



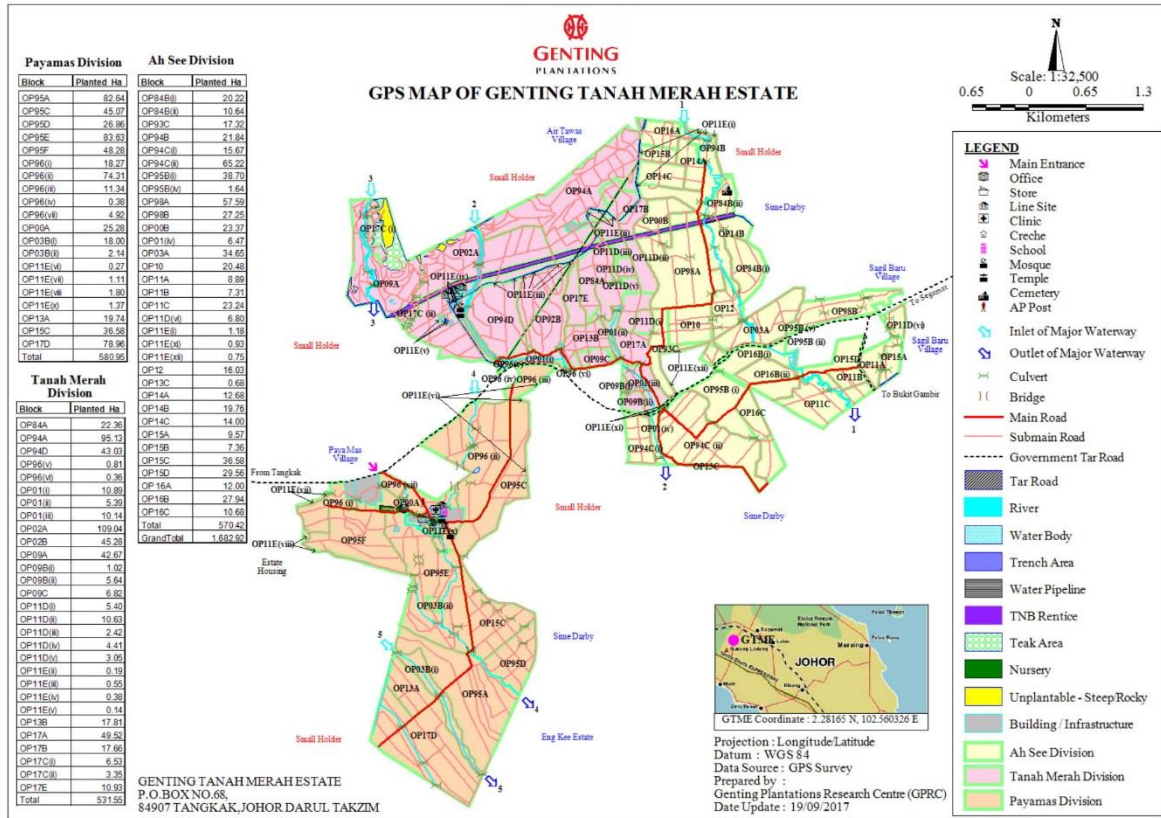
**LOCATION MAP**

GENTING SING MAH ESTATE (GSME) &  
GENTING AYER ITEM OIL MILL (GAIOM)





**Appendix H: Genting Tanah Merah Estate Field Map**



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

## Appendix J: List of Abbreviations

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