

**MALAYSIAN SUSTAINABLE PALM OIL**  
—  
**INITIAL ASSESSMENT**  
**Public Summary Report**

<b>GENTING PLANTATIONS BERHAD</b>
Head Office: 10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur.
Certification Unit: Genting Ayer Item Oil Mill and Genting Plantations (Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate)
Location of Certification Unit: Batu 54, Jalan Johor 86100 Air Hitam, Johor, Malaysia

**Report prepared by:**  
**Mohd Hafiz Bin Mat Hussain (Lead Auditor)**

**Report Number: 8847115**

**Assessment Conducted by:**

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## Section 1: Executive Summary

<b>1.1 Organizational Information and Contact Person</b>			
MPOB License	Genting Ayer Item Oil Mill : 500056-704000 Genting Kulai Besar Estate : 508591-102000, 508595-302000, 540060-011000 Genting Sri Gading Estate : 524435-102000, 508592-902000, 508842-111000 Genting Sungei Rayat Estate : 508590-202000, 501298-102000 Genting Tanah Merah Estate : 611773-002000, 538065-011000, 609122-002000, 559916-701000 Genting Tebong Estate : 501803-202000, 501667-602000, 53982-2011000		
Company Name	Genting Plantations Berhad		
Address	Head office : 10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia Genting Ayer Item Oil Mill, Batu 54, Jalan Johor 86100 Air Hitam, Johor, Malaysia		
Group name if applicable:	N/A		
Subsidiary of (if applicable)	N/A		
Contact Person Name	Mr. Tan Cheng Huat (Senior Vice President – Plantation Division)		
Website	<a href="http://www.gentingplantations.com">http://www.gentingplantations.com</a>	E-mail	<a href="mailto:chenghuat.tan@genting.com">chenghuat.tan@genting.com</a>
Telephone	+603 2333 6510 (Head office) +604 369 0027 (Estate)	Facsimile	+603 2333 6575 +604 452 1188

<b>1.2 Certification Information</b>			
Certificate Number	MSP0 682363 – Genting Ayer Item Oil Mill MSP0 696629 – Genting Plantation (Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate)		
Issue Date	29/06/2018	Expiry date	28/06/2023
Scope of Certification	Genting Ayer Item Oil Mill: Production of Sustainable Palm Oil and Palm Oil Products Plantation: Production of Sustainable Oil Palm		
Stage 1 Date	N/A		
Stage 2 / Initial Assessment Visit Date (IAV)	22-23/1/2018		
Continuous Assessment Visit Date (CAV) 1			
Continuous Assessment Visit Date (CAV) 2			
Continuous Assessment Visit Date (CAV) 3			
Continuous Assessment Visit Date (CAV) 4			

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<b>Other Certifications</b>			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
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	24/10/17–23/10/18 24/10/17–23/10/18
GKBE: MPOB/CoP/ET/00 61-1  GSGE: MPOB/CoP/ET00 63-1  GSRE: MPOB/CoP/ET00 62-1  GTME: MPOB/CoP/ET00 07-2	Code of Good Agricultural Practice for Oil Palm Estates and Smallholdings	MPOB	27/10/18  27/10/18  27/10/18  12/07/20
GSGE: MPOB/CoP/NN/0 023  GTBE: MPOB/CoP/NN/0 269	Code of Good Nursery Practice for Oil Palm Nurseries	MPOB	27/10/18  20/04/19
<b>GAIOM:</b> ISO 9001 : 2008 – AR 2239 ISO 14001 : 2004 – ER 0733 OHSAS 18001 : 2007 – SR 0579 MS 1722 : 2011 – SR 0580	QMS  EMS  OHSAS  OSHMS	SIRIM QAS International	14/09/18  14/09/18  13/01/20  13/01/20
RSPO 653474	RSPO	BSI SERVICES MALAYSIA SDN BHD	26/03/2015 - 25/03/2020

<b>1.3 Location of Certification Unit</b>			
<b>Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)</b>	<b>Site Address</b>	<b>GPS Reference of the site office</b>	
		<b>Longitude</b>	<b>Latitude</b>
Genting Ayer Item Oil Mill (60mt)	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

<b>1.4 Plantings &amp; Cycle</b>						
<b>Estate</b>	<b>Age (Years) - ha</b>					
	1-3	>3-7	>7-15	>15-20	>20-25	>25
Genting Kulai Besar Estate	144.53	270.85	278.66	261.57	388.27	706.53
Genting Sri Gading Estate	759.68	455.56	412.68	812.72	157.49	606.37
Genting Sungei Rayat Estate	375.62	13.19	862.12	614.69	361.33	82.87
Genting Tanah Merah Estate	299.65	205.53	260.62	159.88	687.48	53.19
Genting Tebong Estate	427.11	208.35	4.42	613.04	851.73	66.21
<b>Total (ha)</b>	2,006.59	1,153.48	1,818.50	2,461.90	2,446.30	1,515.17

<b>1.5 Certified tonnage of FFB Production</b>			
<b>Producer Group</b>	<b>Estimated (Jan 17 – Dec 17)</b>	<b>Actual (Jan 17 – Dec 17)</b>	<b>Forecast (Jan 18 – Dec 18)</b>
Genting Kulai Besar Estate	N/A	N/A	44,465.00
Genting Sri Gading Estate	N/A	N/A	69,150.00
Genting Sungei Rayat Estate	N/A	N/A	52,692.00
Genting Tanah Merah Estate	N/A	N/A	36,596.00
Genting Tebong Estate	N/A	N/A	40,000.00
<b>TOTAL</b>	<b>N/A</b>	<b>N/A</b>	<b>242,903.00</b>

<b>1.6 Certified Tonnage</b>			
<b>Mill Capacity: 60 MT/hr</b>	<b>Estimated (Jan 17 – Dec 17)</b>	<b>Actual (Jan 17 – Dec 17)</b>	<b>Forecast (Jan 18 – Dec 18)</b>
	<b>FFB</b>	<b>FFB</b>	<b>FFB</b>
<b>SCC Model: IP</b>	N/A	N/A	242,903.00 mt
	<b>CPO (OER: %)</b>	<b>CPO (OER: %)</b>	<b>CPO (OER: 20.20 %)</b>
	N/A	N/A	42,186.00 mt
	<b>PK (KER: %)</b>	<b>PK (KER: %)</b>	<b>PK (KER: 5.10 %)</b>
	N/A	N/A	10,650.00 mt

<b>1.7 Description of Supply Base</b>					
<b>Estate</b>	<b>Total Planted (Mature + Immature)(ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Genting Kulai Besar Estate	2,050.41	35.10	597.54	2,683.05	76%
Genting Sri Gading Estate	3,204.50	30.62	363.78	3,598.90	89%
Genting Sungei Rayat Estate	2,309.82	0.18	68.98	2,378.98	97%
Genting Tanah Merah Estate	1,666.35	38.78	95.73	1,800.86	93%
Genting Tebong Estate	2,170.86	34.36	80.62	2,285.84	95%
<b>Total</b>	<b>11,401.94</b>	<b>139.04</b>	<b>1,206.65</b>	<b>12,747.63</b>	<b>89%</b>

**1.8 Details of Certification Assessment Scope and Certification Recommendation:**

BSI Services Malaysia Sdn Bhd has conducted the Initial Assessment of Genting Plantations Berhad – Genting Ayer Item Certification Unit, located in Ayer Item, Johor comprising Genting Ayer Item Oil Mill, Plantations (Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate) and infrastructure.

The assessment was conducted onsite to assess the compliance of the certification unit against the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills and MSPO Guidance. The onsite assessment was conducted on 22-23/1/2018.

Based on the assessment result, Genting Ayer Item Oil Mill and Genting Plantation (Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate) complies with the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills and recommended for certification.

## Section 2: Assessment Process

### Certification Body:

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BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

### Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 22-23 January 2018. The audit programme is included as Appendix A. The approach to the audit was to treat the Genting Ayer Item Oil Mill and Plantations (Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate) as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities. Prior to audit conducted, public consultation was made on 20/12/2017 – 21/1/2018; refer <https://www.bsigroup.com/en-MY/RSP0-MSPO-Certification/MSPO-clients-and-reports1/>

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. MS 2530-3:2013 and MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The estates or smallholders sample were determined based on formula  $N = 1.0\sqrt{y}$  where  $y$  is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula  $(1.0\sqrt{y}) \times (z)$ ; where 1.0 is the risk factor (may defers ro 1.2 and 1.4 depending on risk), where  $y$  is total number of group members and where  $z$  is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix C.

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

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

The assessment findings for the this assessment are detailed in Section 4.2.

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This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

This report was externally reviewed by MSPO approved Peer Reviewer prior to certification decision by BSI.

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

<b>1. Assessment Program</b>					
<b>Name (Mill / Plantation / Group smallholders)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 4)</b>	<b>Year 5 (ASA 5)</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 7, 2019 - January 10, 2019**

**Total No. of Mandays: 8**



**BSI Assessment Team:****Mohd Hafiz Mat Hussain – Lead Auditor**

He holds Bachelor Degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSP0 and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2014, MSP0 Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2016. He had been involved in RSPO auditing since May 2013 within Malaysia, Papua New Guinea, Solomon Islands, Gabon and Liberia. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation.

**Nicholas Cheong – Team Member**

He holds Master of Environmental Management from the University Putra Malaysia and Bachelor of Science (Food Science) from Charles Sturt University Australia. He has more than 5 years of working experience in sustainability auditing and carbon emissions accounting. He has also 2 years of working experience in wastewater treatment construction and operations. He has completed the ISO9001, ISO14001 and RSPO P&C Lead Auditor course and MSP0 Awareness Training. In his previous certification body he is a Assessor for Clean Development Mechanism and ISCC. He had been involved in Sustainable Palm Oil auditing for more than 2 years. During this assessment, he assessed on the aspects of legal, environmental, social and stakeholders consultation.

**Hu Ning Shing – Team Member**

She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSP0 and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages.

**Amir Bahari – Team Member**

He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health. He is fluent in both verbal/written in Bahasa Malaysia and English.

### Section 3: Assessment Findings

#### 3.1 Details of audit results

This assessment has been assessed using the following MSPO normative requirements. The assessment details are provided in Appendix A.

- MSPO MS 2530-2:2013 – General Principles for Independent Smallholders
- MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders
- MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

#### 3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During the Initial Certification Assessment there were One (1) Major nonconformities, four (4) Minor nonconformities and two (2) opportunity for improvement raised. The Ayer Item Palm Oil Mill and Plantation Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Major Nonconformities:		
Ref	Area/Process	Clause
1578654-201801-M1	Genting Ayer Item Oil Mill & Plantation	Part 3: [4.3.1.1 ]
Requirements:	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.	
Statement of Nonconformity:	Sampled of the payslips and checkroll attendance records found that the checkroll piece-rated workers and contractors' workers were not paid according to Employment Act 1955, Section 60D, Subsection 3 (a) Notwithstanding subsections (1), (1A) and (1B), any employee may be required by his employer to work on any paid holiday to which he is entitled under the said subsections and in such event he shall, in addition to the holiday pay he is entitled to for that day—(ii) "in the case of an employee employed on piece rates, be paid twice the ordinary rate per piece" and Section 60, Subsection 3(d) "In the case of an employee employed on piece rates who works on a rest day, he shall be paid twice his ordinary rate per piece."	
Objective Evidence:	Sampled of the payslips and checkroll attendance records found that the checkroll piece-rated workers and contractors' workers were not paid twice the ordinary rate per piece for the workers who worked on rest day or paid public holiday as below: i) Passport No.: A2398889 (Contractor: Tan Ah Sang) - December 2017 ii) Passport No.: B4064725 (Contractor: Tan Ah Sang) - December 2017 iii) Passport No.: B5355987 (Contractor: Tan Ah Sang) - December 2017 iv) Passport No.: B4962145 (Contractor: Apeng Resources) - December 2017 v) Passport No.: AT801119 (Contractor: Apeng Resources) - December 2017 vi) Employee ID: 03603 (September 2017) vii) Employee ID: 03559 (September 2017)	

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	viii) Employee ID: 03593 (September 2017) ix) Employee ID: 03538 (September 2017)
Corrections:	All affected employees at the 5 estates (GSGE, GTME, GTBE, GSRE & GKBE) to be paid for the month of Dec 2017.  Assessment Team Verification: Proved of payments was reviewed to confirm correction has been completed.
Root cause analysis:	The management was guided by the previous agreement with the workers (v1.0 dated 27-07-16) which stated that management offer work (during RD & PH) only for daily rated workers, and not piece rated workers.
Corrective Actions:	<ol 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> </ol> <p>Justification for closure by assessment team:  Closed on 26/03/2018</p> <ol style="list-style-type: none"> <li>1. Sighted the list of workers that are required to be compensated due to work on Sunday in December 2017 at GSGE. The bunches identified in the compensation list was verified with check-role workers' the daily inputs to be consistence.</li> <li>2. The revise Contract template dated 21/03/2018 has clearly define the payment for work on rest day and holiday. In GSGE there was 15 new workers. The revised contract has been implemented. <ol style="list-style-type: none"> <li>a. Zulhaki (harvester) joined on 17/03/2018</li> <li>b. Hapizur Rahman (harvester) joined on 17/03/2018</li> <li>c. Veri Andriawan (harvester) joined on 17/03/2018</li> <li>d. Juleni (harvester) joined on 17/03/2018</li> <li>e. Rijalul Hadi (harvester) joined on 17/03/2018</li> </ol> </li> <li>3. For existing workers, an addendum template dated 21/03/2018 for the existing employment contract that clearly define the payment for work on rest day and holiday has been distributed to the workers and agreed upon. <ol style="list-style-type: none"> <li>a. Romjam GAIOM</li> <li>b. Pandey GAIOM</li> <li>c. Julani GSGE</li> <li>d. Mahrip GSGE</li> <li>e. Mawar GSGE</li> </ol> </li> </ol> <p>The Group Policy dated 01/01/2018 with regards to work on rest day and work on public holiday was communicated by Mr Foo See Sun tonPlantation VP and Estate Manager on 17/01/2018. The Policy clearly indicated for work on rest day and work on public holiday, permission must be given by VP Plantation. There were no work on rest day and work on public holiday at GSGE since 17/01/2018. Hence no request/approval was available.</p>

Assessment Conclusion:	With the implementation on new contract agreement and new policy, the assessment team deemed the non-compliance can be effectively address. The continuous implementation will be verified in the next assessment.
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<b>Minor Nonconformities:</b>		
<b>Ref</b>	<b>Area/Process</b>	<b>Clause</b>
1578654-201801-N1	Genting Ayer Item Oil Mill & Plantation	Part 3: [4.4.5.14 ]
Requirements:	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.	
Statement of Nonconformity:	Hazardous working condition was exposed to the newly recruited worker who is below 18 years old where it did not according to the company's policy.	
Objective Evidence:	Document verified the List Name of Workers found that the company has recruited a worker at age 17 on 13/12/2017 for grass cutting activities with Employee No.: 03094 in Genting Tanah Merah Estate. Seen at the Social Policy where the company will not employed workers less than 15 years of age for full-time work and 18 years of age for hazardous work.	
Corrections:	The worker was sent to 'non-hazardous' and 'non-pesticides' related job wef 30/1/2018, until he attain 18 years old.  A memo was issued followed by briefing to all level of executives and staffs on the minimum age requirement.	
Root cause analysis:	No monitoring on the age requirement when recruiting the worker.	
Corrective Action Plan:	1. Briefing on minimum age requirement to all level of executives and staffs to check and monitor age when recruiting workers.  2. GENPIT/Lintramax:  To amend the Lintramax system to restrict / to ensure workers above 18 years only are allowed to be registered as an employee.	
Assessment Conclusion:	The effectiveness of the corrective action will be verified in the next assessment.	

<b>Minor Nonconformities:</b>		
<b>Ref</b>	<b>Area/Process</b>	<b>Clause</b>
1578654-201801-N2	Genting Ayer Item Oil Mill & Plantation	Part 3 & Part 4: [4.1.2.1 ]
Requirements:	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.	
Statement of Nonconformity:	Internal Audit conducted not clearly indicate the MSPO requirements	
Objective Evidence:	The findings raised during internal audit conducted on January 2018 were only referenced to RSPO requirements in which the incompliance was not identified for MSPO.	
Corrections:	To include the 'MSPO clause requirements' in the Internal Audit reports.	

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Root cause analysis:	Internal audit procedure for combined sustainability audits (RSPO and MSPO) not available.
Corrective Action Plan:	To review Sustainability Internal Audit procedure (SMP-GPB-03) to include relevant requirements for the combined sustainability audits (RSPO, MSPO and ISCC).  To review and update checklist used for combined RSPO and MSPO internal audit.
Assessment Conclusion:	The effectiveness of the corrective action will be verified in the next assessment.

<b>Minor Nonconformities:</b>		
Ref	Area/Process	Clause
1578654-201801-N3	Genting Ayer Item Oil Mill & Plantation	Part 4: [4.2.2.3]
Requirements:	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.	
Statement of Nonconformity:	The list of stakeholders is incomplete	
Objective Evidence:	The list of stakeholders is not updated accordingly. For example, there is no contact details for Sekolah Agama Sri Maju Jaya and Tabika Kemas.	
Corrections:	To update immediately all the contact number of stakeholders in the list including 'Sekolah Agama Sri Maju and 'Tabika Kemas'.	
Root cause analysis:	Stakeholders list was not verified & updated periodically (at least once a year) as per Social Management Procedure SMP-GPB-32.	
Corrective Action Plan:	To train document controller to review, verify and update stakeholders in the list on yearly basis, or as and when necessary (as per Social Management Procedure SMP-GPB-32).	
Assessment Conclusion:	The effectiveness of the corrective action will be verified in the next assessment.	

<b>Minor Nonconformities:</b>		
Ref	Area/Process	Clause
1578654-201801-N4	Genting Ayer Item Oil Mill & Plantation	Part 4: [4.5.1.2]
Requirements:	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations.	
Statement of Nonconformity:	Management plan for effluent treatment was not identified	
Objective Evidence:	During the visit to the effluent pond, the free board of Pond 4 is less than 0.5m (almost reaching the bund). The management plan has not identify what is the mitigation required to ensure that the effluent does not overflow.	
Corrections:	Update the 'Water Management Plan' by specifying the free board 0.7m for effluent pond and specifying the mitigation plans.	
Root cause analysis:	No monitoring on the freeboard (as per Jadual Pematuhan) caused failure to identify the mitigation plans.	

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Corrective Action Plan:	To train operators on the mitigation plans when freeboard is less than 0.7m.  To train document controller to review and update Water Management Plan and other documents in quarterly basis.
Assessment Conclusion:	The effectiveness of the corrective action will be verified in the next assessment.

Opportunity For Improvement:		
Ref	Area/Process	Clause
1578654-201801-I1	Genting Ayer Item Oil Mill & Plantation	Part 3 & Part 4: [4.2.3.1 ]
Details	Training on traceability and supply chain specifically for MSPO shall be conducted.	

Opportunity For Improvement:		
Ref	Area/Process	Clause
1578654-201801-I2	Genting Ayer Item Oil Mill & Plantation	Part 3: [4.4.4.2]
Details	PPE for nursery workers to mitigate heat stress was not appropriately provided.	

Noteworthy Positive Comments	
1.	Good commitment from the management to maintain the certification system.
2	Good feedbacks from the stakeholders during interviewed.
3	Easily retrieve of document and records.
4	Good housekeeping at facilities such as Workshop, Chemical Store.
5	Good implementation of mechanization for operations which improved efficiency and reduced resources.

### **3.3 Status of Nonconformities Previously Identified and OFI**

Not applicable since this is Initial Assessment.

**3.4 Issues Raised by Stakeholders**

IS #	Description
1	<p><b>Feedbacks:</b> Contractors – They have signed on the agreement prior commence of work. They were understood on the terms and conditions such as the payment terms. They informed that the payment made by Genting Plantations Berhad was on time through internet banking. In conclusion, they have good relationship with the managements.</p> <p><b>Management Responses:</b> The management will continue to maintain good relationship with the contractors.</p> <p><b>Audit Team Findings:</b> Verified on the agreement and payment advice found that the payments were made promptly.</p>
2	<p><b>Feedbacks:</b> Forestry Department Officers – They informed that no complaint was received towards Genting Plantations Berhad on encroachment of reserved forest. They cooperate with patrolling team from Forest Reserve Gunung Tahan to monitor if there is any encroachment or clearing of forest.</p> <p><b>Management Responses:</b> The management will ensure no encroachment or clearing of reserve forest.</p> <p><b>Audit Team Findings:</b> No further issue.</p>
3	<p><b>Feedbacks:</b> School Representatives – They informed that the management has given supports and assistance whenever they requested such as usage of football field for sport day, donation for school’s activities. They concluded that they have good relationship with the management.</p> <p><b>Management Responses:</b> The management will response and assist whenever they could.</p> <p><b>Audit Team Findings:</b> No other issue.</p>
4	<p><b>Feedbacks:</b> Workers’ Representatives (Bangladesh, Indonesia, India, Pakistan, Nepal) – They informed that they have signed on the agreement in home country and in the plantations. No contract of substitution occurred. The salary offered in home country was the similar when arrived to the plantations. They were treated equally and no discrimination reported. If they have any complaints or grievances, they will report to the supervisor or mandore or fill in the Complaint &amp; Grievance Book.</p> <p><b>Management Responses:</b> The management will ensure they treat all the workers fairly and no contract substitution will happen.</p> <p><b>Audit Team Findings:</b> No further issue.</p>
5	<p><b>Feedbacks:</b> - Village Head of Kg. Rahmat – No land dispute case reported so far. He has good relationship with the management. He also aware of the complaint &amp; grievance procedure. He informed that there were some local villagers worked in the plantations and mill.</p> <p><b>Management Responses:</b> - The management will continue to ensure good relationship with the management and provide employment opportunities to the local communities.</p> <p><b>Audit Team Findings:</b> No further issue.</p>
6	<p><b>Feedbacks:</b> Smallholders – They mentioned that boundaries of their land were clearly demarcated with gates and trenches. No encroachment of land by the management and therefore, no dispute case reported. However,</p>



	one of the smallholder requested the management to open the gate for them to access and transporting their crop out from the field anytime.
	<p><b>Management Responses:</b>          The management informed that they will allowed the smallholders to access out of the scheduled time upon request from smallholders.</p>
	<p><b>Audit Team Findings:</b>          No other issue.</p>

### 3.5 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1578654-201801-M1	Major	23/1/18	Closed on 26/3/2018
1578654-201801-N1	Minor	23/1/18	"open"
1578654-201801-N2	Minor	23/1/18	"open"
1578654-201801-N3	Minor	23/1/18	"open"
1578654-201801-N4	Minor	23/1/18	"open"

**3.6 Summary of the findings by Principles and Criteria**

**A) MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders – Genting Plantation (Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate)**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	A policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	The company has initiated the implementations of MSPO requirements. MSPO Policy has been established and signed by President & Chief Operating Officer dated 18/3/2014.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. <b>- Major compliance -</b>	The established policy has emphasized on the commitment to continual Improvement within the journey towards achieving sustainable palm oil.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	Internal audit was conducted on 8-9 <sup>th</sup> February 2018 for Genting Tanah Merah Estate, 4-5 <sup>th</sup> January 2018 for Genting Sri Gading Estate. Audit covered both documentation and field operation for the estate. There are 13 Major (GTME) and 1 Major (GSGE) findings were raised during Internal Audit. The CAP was established.	Minor Nonconformance

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Criterion / Indicator		Assessment Findings	Compliance
		However, the findings raised during internal audit conducted on January 2018 were only referenced to RSPO requirements in which the incompliance was not identified for MSPO. Thus, Minor non-conformance was raised.	
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.  - <b>Major compliance</b> -	Internal Audit procedure was established, refer to Sustainability Management Procedure Manual (SMP-GPB-03), Revision:01 dated 11/12/2013. The procedure was mentioned about the audit criteria, audit schedule and audit plan, the role of Lead Auditor, Team member. The auditee need to identifies the corrective actions required to eliminate the non-conformity and its root cause. The auditee will implements the corrective actions according to the agreed plan. The audit documents and reports will be kept for a period of 10 years.	Complied
<b>4.1.2.3</b>	Report shall be made available to the management for their review.  - <b>Major compliance</b> -	Report of Internal Audit for Genting Tanah Merah Estate (dated 10/1/2018) and Genting Sri Gading Estate (dated 6/1/2018) was available for review.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.  - <b>Major compliance</b> -	Management Review procedure was established accordingly, refer to Sustainability Management Procedure Manual (SMP-GPB-06) Revision:00 dated 1/8/2013. The 1 <sup>st</sup> MRM for MSPO was done on 12/1/2018 involved all the estate and mill personnel under Genting Ayer Item CU. All the agenda were discussed during MRM, eg: action of previous meeting, MSPO audit schedule and certification status, changes and improvement on Sustainability Management System, result of internal audit, complaint and grievances, enquiry register, stakeholder meeting, greenhouse gas, resources and training,	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		sustainability policies, review of effectiveness in achieving quality, environmental, social, safety and health objectives, compliances to legal requirements, preventive action & corrective actions and recommendations for improvement.	
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.  - <b>Major compliance</b> -	Sample of Continual Improvement for 2018 at all estate visited: A) Genting Tanah Merah Estate/Genting Sri Gading Estate 1. Minimize use of pesticides 2. To improve on environmental aspects and impacts, risk assessment and risk control 3. Waste reduction 4. Pollution and greenhouse gas (GHG) emissions. 5. Social impacts 6. Encourage optimizing the yield of the supply base 7. Efficient fertilizer management 8. Efficient diesel and electricity consumption	Complied
<b>4.1.4.2</b>	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.  - <b>Major compliance</b> -	The management has established the mechanization for spraying activity, manuring activity, P&D activity. Eg: Mono sprayer, Scorpio P&D sprayer, mantis P&D sprayer, Mechanical Fertilizer Spreader, Mechanical Circle Raking, assisted EFB application.	Complied

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1.4.3</b>	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established.  - Major compliance -	The management has plan to implement FFB evacuation mechanical carrier at terrace area.	Complied
<b>4.2 Principle 2: Transparency</b>			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
<b>4.2.1.1</b>	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.  - Major compliance -	Genting Tanah Merah Estate and Genting Sri Gading Estate has maintained records of enquiries, Land titles, OSH plans, policies, plans and impact assessments relating to environmental and social, plans for pollution prevention, records of complaints and grievances, plans for continuous improvement. All these documents and records are made available upon request by the stakeholders. Annual reports are available in the company’s website which could be assess by the stakeholders. The company also issued a memo with all the documents/ reports and policies listed which made publicly available to the stakeholders.	Complied
<b>4.2.1.2</b>	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.  - Major compliance -	Genting Tanah Merah Estate and Genting Sri Gading Estate holds copies of each of the management documents that are required to be publicly available. Besides, all the information such as annual report, sustainability news, policies were found available in the company’s website: <a href="http://www.gentingplantations.com">www.gentingplantations.com</a> .	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication with the relevant stakeholders. <b>- Major compliance -</b>	Genting Plantations Berhad has developed Consultation and Communication Procedure, Doc. No. SMP-GPB-17, Rev. 0, Issue Date: 11/10/2015. The objective of the procedure is to ensure effective of internal and external communication of sustainability requirements and responding to communications from interested parties. Two way communication process is practice in the company. The topics such as participation in decision making, complaints and grievances, FPIC will be discussed. All the issues will be handled by Manager.	Complied
<b>4.2.2.2</b>	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. <b>- Minor compliance -</b>	The Manager of Genting Tanah Merah Estate and Genting Sri Gading Estate has been appointed by Vice President of Plantation (WM) to be the Management Representative for ISCC, RSPO and MSPO related matters. The responsibilities of the MR have been clearly stated in the appointment letter dated 18/11/2015. Besides, Estate Manager of Genting Tanah Merah Estate has appointed Assistant Manager as Sustainability Coordinator for ISCC, RSPO and MSPO related matters at Genting Tanah Merah Estate and seen the letter of appointment dated 17/8/2017.	Complied
<b>4.2.2.3</b>	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. <b>- Major compliance -</b>	Stakeholder list for Genting Tanah Merah Estate and Genting Sri Gading Estate was sighted which included contractors and suppliers, government authorities, local communities, smallholders.  Genting Tanah Merah Estate and Genting Sri Gading Estate has implemented Enquiry Register Book where all the stakeholders with requests will be recorded in the book. The request and response are	Complied

Criterion / Indicator	Assessment Findings	Compliance
	<p>in two way communication where the management will replied accordingly to all the requests by the stakeholders. The requesters will acknowledged on the book after actions have been taken by the management.</p> <p>Besides, stakeholder meeting with external stakeholders was conducted on yearly basis and the last meeting was held on 27/9/2017. Seen the meeting minutes with total 25 attendees which consisted of school's representatives, Head of Local Communities, local authorities. Seen the action plan and evidence of action taken was sighted.</p> <p>In additional, Workers' Committee was established to discuss the issues related to workers. The committee was formed by workers from different nationalities such as Indonesia, India, Bangladesh. The last meeting was conducted on 29/12/2017.</p> <p>Internal stakeholder meeting was held on 26/9/2017 with total 20 attendees. Seen the meeting minutes and no issue was reported during the meeting.</p> <p>In Genting Sri Gading Estate, external stakeholder meeting was conducted on 25/10/2017 and internal stakeholder meeting was carried out on 26/8/2017. Seen the meeting minutes with action plan available and issues have been rectified.</p>	

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Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). <b>- Major compliance -</b>	Genting Plantations Berhad has developed a Traceability Procedure with Doc. No. SMP-GPB-09, Rev. 02 dated 14/8/2014. The procedure has clearly explained to ensure the handling of outgoing FFB are carried out in proper manner.	Complied
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	During month end, the estates' management will carried out Crop Declaration inspection to counter check the traceability system.	Complied
<b>4.2.3.3</b>	The management should identify and assign suitable employees to implement and maintain the traceability system. <b>- Minor compliance -</b>	The Manager of the Estate has appointed the Assistant Manager as Sustainability Coordinator to handle matters for ISCC, RSPO and MSPO including the traceability system. Seen the appointment letter dated 17/8/2017.	Complied
<b>4.2.3.4</b>	Records of sales, delivery or transportation of FFB shall be maintained. <b>- Major compliance -</b>	Daily FFB Muster Sheet was sighted where the records of harvesting, despatching and field balance was recorded in the Muster Sheet. Verified the traceability records for 14/1/2018 for the 3 Divisions in Genting Tanah Merah Estate for each field.  Daily FFB Muster Sheet, FFB Harvesting Chit and Daily FFB Gross Weight Monitoring was sighted. Verified the FFB Harvesting Chit No. 103263 harvested on 28/12/2017, OP96B for total 351 bunches. Verified the traceability via the weighbridge ticket of delivery of FFB to mill as below:  i. Delivery Note# FFB17005465W for 351 bunches	Complied



Criterion / Indicator	Assessment Findings	Compliance	
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
<b>4.3.1.1</b>	<p>All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p><b>- Major compliance -</b></p>	<p>Evaluation of legal requirements and compliance status with legal requirement is monitored by operating units, Sustainability Team, OHS Department and head office audit Department. Besides, the internal audit conducted by the sustainability team from HQ will able to check on the compliance status of the operating unit. The latest internal audit for Genting Tanah Merah Estate (GTME) conducted on 8-9/1/18; Genting Sri Gading Estate on 4-5/1/18.</p> <p>Sampled of the payslips and checkroll attendance records found that the checkroll piece-rated workers and contractors' workers were not paid twice the ordinary rate per piece for the workers who worked on rest day or paid public holiday according to the legal requirements as below:</p> <ul style="list-style-type: none"> <li>i. Passport No.: A2398889 (Contractor: Tan Ah Sang) - December 2017</li> <li>ii. Passport No.: B4064725 (Contractor: Tan Ah Sang) - December 2017</li> <li>iii. Passport No.: B5355987 (Contractor: Tan Ah Sang) - December 2017</li> <li>iv. Passport No.: B4962145 (Contractor: Apeng Resources) - December 2017</li> <li>v. Passport No.: AT801119 (Contractor: Apeng Resources) - December 2017</li> </ul>	<p>Major Non conformance</p>

Criterion / Indicator		Assessment Findings	Compliance
		vi. Employee ID: 03603 (September 2017) vii. Employee ID: 03559 (September 2017) viii. Employee ID: 03593 (September 2017) ix. Employee ID: 03538 (September 2017) Thus, a major non-compliance was raised.	
<b>4.3.1.2</b>	The management shall list all laws applicable to their operations in a legal requirements register. <b>- Major compliance -</b>	Estate sharing the same legal requirement system register. Documented system including legal requirements register (doc: SMP-GPB-22; revision 05-12 <sup>nd</sup> January 2018) is available. The content of the register as below:  1. List of local legal requirements applicable to plantation operations in Malaysia  2. List of international standards/requirements applicable to plantation operation in Malaysia  Part 1: Environment  Part 2: Safety and Health  Part 3: Social  Part 4: Best Practices and other requirements  Part 5: International Standards/Requirements	Complied
<b>4.3.1.3</b>	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. <b>- Major compliance -</b>	Documented system including legal requirements register (doc: SMP-GPB-22; revision 05-12 <sup>nd</sup> January 2018) is available. The last update was done on 12/1/2018 to include Pasport Act 1966 and Anti Trafficking in Persons, Anti Smuggling of Migrants Act 2007.	Complied

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<b>4.3.1.4</b>	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p><b>- Minor compliance -</b></p>	<p>Genting Plantations Berhad has established a documented procedures on regional, national and international laws (SMP-GPB-21; Revision 01,dated 14<sup>th</sup> Aug 2014) for tracking any changes in the law. For the changes of laws, the company will refer to as below:</p> <ul style="list-style-type: none"> <li>a. Notification of changes from various source of information</li> <li>b. Monitoring for changes</li> <li>c. Clarification and review on the changes</li> <li>d. Updating of the Legal register administered internally</li> <li>e. Notification to the operating units and/or the relevant person in charge</li> </ul> <p>Currently, the person/team responsible for monitoring the changes and communicating in GTME is Estate Manager.</p>	Complied
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p><b>- Major compliance -</b></p>	<p>The company has initiated the implementations of MSPO requirements through MSPO Policy that has been established. The policy was signed by President &amp; Chief Operating Officer dated 18/3/2014. All the land title was sighted and it clearly stated for agricultural.</p>	Complied
<b>4.3.2.2</b>	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p>	<p>A) Genting Tanah Merah Estate            Total Title= 35 title            Total Ha= 1,883.902 Ha            Hectarage Statement as at 31/12/17= 1,800.86Ha            1. Grant Title: 122562 (Lot 3848) – 0.2951 Ha, Freehold</p>	Complied

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	- Major compliance -	2. Grant Title: 81740 (Lot 3849) – 126.9195 Ha, Freehold 3. Grant Title: 81750 (Lot 3854) – 295.724 Ha, Freehold 4. Grant Title: 91183 (Lot 534) – 160.2049 Ha, Freehold  B) Genting Sri Gading Estate Total Title= 36 title Total Ha= 3,610.44 Ha Hectarage Statement as at 1/1/18= 3,598.90 Ha  1. Grant Title: 67550 (PTD 63586) – 3,047.60 Ha, Freehold 2. Grant Title: 84645 (Lot 877) – 7.1604 Ha, Freehold 3. Grant Title: 95122 (Lot 1326) – 18.6534 Ha, Freehold 4. Grant Title: 89358 (Lot 1300) – 9.3583 Ha, Freehold	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.  - Major compliance -	All the perimeter boundaries were clearly marked as per SOP. The boundary stones was sighted at GTME (field 02A boundary with smallholder) and GSGE (field 01D boundary with SOGA Forest)	Complied
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC).  - Minor compliance -	There is no land dispute in the Genting Sri Gading Estate 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.  Recently, there was a hand-over of land to smallholder that had reported on 10/10/2015. The land that overplanted by Genting Tanah Merah Estate was at OP2002A, Lot 3853 for total 0.354 ha. A re-survey has carried out on December 2015 and seen the re-survey map with plan no. LPM/640-2015M(1). This was confirmed that there was	Complied

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		encroachment occurred. On 10/1/2018, the management has surrendered the land together with 4 palm trees to the smallholder upon mutual agreed by both parties and seen the letter dated 10/1/2018 and photos that the management meeting with the smallholder. Phone interviewed with the smallholder confirmed that the land has surrendered back to him. No further issue raise after that.	
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. <b>- Major compliance -</b>	There is no customary land or negotiated agreements at Genting Ayer Item certification unit.	Complied
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. <b>- Minor compliance -</b>	There is no customary land or negotiated agreements at Genting Ayer Item certification unit.	Complied
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. <b>- Major compliance -</b>	There is no customary land or negotiated agreements at Genting Ayer Item certification unit.	Complied
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.	Social Impact Assessment and Human Rights Impact Assessment (HRIM) was conducted on 12-20/12/2017 in Genting Tanah Merah Estate and 13-14/10/2017 and 5-11/12/2017 in Genting Sri Gading Estate by Sustainability Department. The assessment was carried out	Complied

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	- <b>Minor compliance</b> -	<p>by interviewed with randomly selected stakeholders such as local workers, foreign workers, contractors, government authorities. The area that covered during the SIA assessment were such as economic livelihood, environment issue, health and wellbeing. Besides, JCC/ Workers' Committee meeting was carried out to collect feedback from the stakeholders and incorporated into action plan.</p> <p>The management plan has included the issues raised during SIA assessment, OSH meeting, and internal &amp; external stakeholder meetings. The plan has incorporated the mitigation plan with person in charge and the specific timeline. For eg:</p> <ul style="list-style-type: none"> <li>i. Issue: No transport for new workers. Mitigation Plan: To provide bicycle for each of the new workers.</li> </ul> <p>Status: The management has provided bicycles for the new workers. Seen the bicycles at Genting Sri Gading Estate that going to supply to the new workers who just arrived during the time of audit.</p>	
<b>Criterion 4.4.2:</b> Complaints and grievances			
<b>4.4.2.1</b>	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- <b>Major compliance</b> -</p>	<p>Genting Plantations Berhad has developed Complaints and Grievances Procedure with Doc. No. SMP-GPB-19, Rev. 02 dated 5/9/2014. The procedure is to provide guidelines on handling complaints &amp; grievances such as internal complaints, issues due to customary land rights, other external stakeholders. Time frame to solve the complaints and grievances is clearly defined in the flowchart which is 14 working days to acknowledge and respond upon receipt.</p>	Complied

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4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. <b>- Major compliance -</b>	Complaints/ Grievances Record Book was implemented in the estates of Genting Plantations Berhad.  Seen the record book in Genting Tanah Merah Estate and most of the complaints were related to housing repair. Sampled of the complaints as below: i. Ref. No. 052 – Lamps were not functioning and reported on 17/1/2018. The technician has replaced the lamps and has been acknowledged by the complainant after the action taken on 18/1/2018. ii. Ref. No. 048 – Sink at House No. 36 was broken and reported on 4/1/2018. Inspection by the technician was carried out on 5/1/2018 and have been repaired on 18/1/2018.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. <b>- Minor compliance -</b>	The estates’ management has maintained Complaint Form and Complaint Box outside the office where the internal and external stakeholders are able to lodge complaint anytime. Interviewed with the stakeholders confirmed that they are aware of the complaint procedure and understand their rights to lodge complaint.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. <b>- Minor compliance -</b>	Interviewed with the stakeholders such as contractor, school’s representatives and government authorities found that they are aware of the complaint and grievance procedure.	Complied
4.4.2.5	Complaints and resolutions for the last 24 months shall be	Record review found that previous complaints and grievances from January 2015 to January 2018 was kept and maintained.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	documented and made available to affected stakeholders upon request. <b>- Major compliance -</b>		
<b>Criterion 4.4.3:</b> Commitment to contribute to local sustainable development			
<b>4.4.3.1</b>	Growers should contribute to local development in consultation with the local communities. <b>- Minor compliance -</b>	Genting Tanah Merah Estate and Genting Sri Gading Estate has made contribution to the local communities and their workers such as provided hamper during festive season to the workers, sponsor of school bags to the children during new year, given groceries to the older, helped the school to pay electricity and water bill, provided football field to the school for their sport days. Interviewed with the stakeholders confirmed that the CSR was done by the company.	Complied
<b>Criterion 4.4.4:</b> Employees safety and health			
<b>4.4.4.1</b>	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. <b>- Major compliance -</b>	The Occupational Safety And Health Policy was established, signed by President and Chief Operating Officer on 1 <sup>st</sup> July 2015. The policy was communicated during Policy briefing which was conducted on 12/1/2018 (GTME) and 24/11/17 (GSGE). The policy was displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH personnel from Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors. In interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the policy.	Complied



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<b>4.4.4.2</b>	<p>The occupational safety and health plan shall cover the following:</p> <ul style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risks of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:               <ul style="list-style-type: none"> <li>i. all employees involved shall be adequately trained on safe working practices</li> <li>ii. all precautions attached to products shall be properly observed and applied</li> </ul> </li> <li>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</li> <li>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</li> <li>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust</li> </ul>	<p>OSH Plan was established.</p> <ul style="list-style-type: none"> <li>a) The Occupational Safety And Health Policy was established, signed by President and Chief Operating Officer on 1<sup>st</sup> July 2015. The policy was communicated during Policy briefing which was conducted on 12/1/2018 (GTME), 24/11/12 (GSGE) and 17/1/18 (Tebong Estate).</li> <li>b) CHRA was conducted on 18/1/17 (GSGE) which was conducted by QMSPRO Sdn Bad (JKKP HIE 127/171-2(154)). SOP for HIRARC was established. The technique was described accordingly in the SOP. The HIRARC was reviewed on 19/1/2018 (GTME) to include all the activities involved with pregnant workers for general work, eg: planting mucuna, de-creeping and EFB applications.</li> <li>c) Training matrix was established by the management. A formal training programme on all aspects of MSPO requirement has been established and implemented. The training program for 2018 includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to workers eg;               <ul style="list-style-type: none"> <li>- GTME: chemical handling (5/9/17), harvesting (21/6/18), ERP (20/5/17), Manuring (6/4/17), 28/10/17 (Spraying), 19/9/17 (Triple rinsing, PPE, HIRARC), 20/1/18 (SOP for grinder)</li> <li>- GSGE: nursery (29/12/17), workshop (28/12/17), motorised cutter (28/12/17), handling tractor (24/12/17), MSPO refreshment (13/12/17), rat baiting (25/11/17), buffer zone &amp; HCV (25/11/17), BOFA (21-22/11/17), Induction new workers (10/11/17), PPE (20/10/17), Spraying (11/10/17), harvesting (10/8/17), chemical handling (10/6/17), Manuring (6/4/17)</li> </ul> </li> </ul>	Complied

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<p>must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee’s health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>- GTBE: Chemical mixing (18/1/18), P&amp;D spraying (20/9/17), chemical spill (7/9/19), chemical handling (28/4/17), rat baiting (2/2/17).</p> <p>d) The estates provide PPE to the employees relevant to the work handled by the workers. The list of PPE that were provided by the estates are as below:</p> <ul style="list-style-type: none"> <li>i. Harvester- Safety Helmet, Sickle Cover, Hand Glove. Wellington Boots</li> <li>ii. Sprayers- Respirator, Nitrile Glove (Chemical Resistant) Goggles, Wellington Boots, Apron.</li> <li>iii. Manuring- Apron, Wellington Boots, Dust Mask</li> </ul> <p>Records of PPE issuance for both estates were sighted. Observed at spraying activities (GTME-OP95E and Tebong Estate P95 /P02A), adequate and appropriate protective equipment was provided.</p> <p>e) SOP for chemical management (Rev:3, Dated Oct 2013) was established. Register of Chemical was sighted to include the entire chemical used in the estate such as Ken Amine, Ken Glyphosate, Ally 20DF, Basta 15, Impact 75, Promax. The form was prepared by Sr Asstant, dated on 15/12/17 (GTME) and Asstant Manager, dated 22/1/18 (GSGE).</p> <p>f) At all estate visited, there are OSH Coordinator who are responsible for organising safety training, meetings and investigation and reporting of accidents and Incidents. SHC Organization – Chairman : Estate Manager, SHC secretary: OSH coordinator Records were available confirming that quarterly OSH meetings had been held at the Estate.</p>	

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	<p>Refer OHS meeting minutes (GTME)- #4: dated 27/11/17, #3: dated 29/8/17, #2: dated 24/5/17  Refer OHS meeting minutes (GSGE)- #4: dated 15/12/2017, #3: dated 26/9/17, #2: dated 6/7/17  Refer OHS meeting minutes (GTBE)- #4: dated 15/12/17, #3: dated 29/9/17, #2: dated 14/6/17</p> <p>g) The Estates has site specific Plans in the OSH Manual (OM-GPB-04, Rev:0, Dated 1/1/10) including ERP for accident, ERP for Fire, ERP for chemical spillage, maps showing assembly areas and up-to-date lists of emergency contacts with training conducted to communicate the Plan. Latest fire drill was conducted on 16/8/2017 (GTME) and 9/12/17 (GSGE). Interviews of staff and workers confirmed understanding of emergency response procedures.</p> <p>h) First Aid Kits are given to the head of gang for each activities (eg: harvesting, spraying, manuring) and inspection confirmed these had been appropriately stocked. At GTBE, this was sighted in the training session 23/10/17 recorded. The First Aid Kit (box) equipped with approved 16 items were available and replenished on a weekly basis. Distribution of the 1<sup>st</sup> Aid Kit for both the estates are made at the following places/personnel; Office / AP Post / Chemical Store / Fertiliser Store / Workshop / Field staff / Mandores. The boxes kept by the mandores were sighted during the field visit. Both estates had regular monthly briefing to the 1<sup>st</sup> Aid Kit holders on the management of the content and usage. The sessions were briefed by the HAs/Executives</p>	

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Criterion / Indicator		Assessment Findings	Compliance										
		<p>i) All accidents are investigated and reported to Head Office. All the records related to accident were available at Estate office.</p> <table border="1"> <thead> <tr> <th>Year</th> <th>GTME</th> <th>GSGE</th> <th>GTBE</th> <th>GAIOM</th> </tr> </thead> <tbody> <tr> <td>2017</td> <td>19</td> <td>0</td> <td>36</td> <td>110</td> </tr> </tbody> </table> <p>The HIRARC was reviewed accordingly. Submission of JKPP 6 to DOSH where required was complied under the legislative requirement.</p> <p>Medical surveillance for GSGE was done on 4/4/17 (J78181913 and AT201894), the result from the OHD (Klinik Nur-HQ/08/DOC/00/347) was Fit to work.</p>	Year	GTME	GSGE	GTBE	GAIOM	2017	19	0	36	110	
Year	GTME	GSGE	GTBE	GAIOM									
2017	19	0	36	110									
<b>Criterion 4.4.5: Employment conditions</b>													
<b>4.4.5.1</b>	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has developed a Social Policy dated 22/6/2015 which was signed by top management with incorporating the Labour and Human Rights requirements. The company will respect and support the Universal Declaration of Human Rights. The policy was communicated to employee accordingly.</p>	Complied										
<b>4.4.5.2</b>	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p>	<p>Genting Plantationd Berhad has developed People Policy dated 3/8/2009 where the company prohibit any form of violence, harassment or discrimination against race, religion, national origin, disability, pregnancy, age and gender. Inspection of a sample of pay slip and interviewed with the workers found that no any issues related to discrimination was reported.</p>	Complied										

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>There was contract agreement for staff and workers as well as contract workers. Pay and conditions are documented and are above the Minimum Wage Order 2016. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Sampled of payslip for February 2017, July 2017, September 2017, November 2017 and December 2017 as below:</p> <ul style="list-style-type: none"> <li>i. Employee ID: 03034 (GTME)</li> <li>ii. Employee ID: 02963 (GTME)</li> <li>iii. Employee ID: 02700 (GTME)</li> <li>iv. Employee ID: 03413 (GSGE)</li> <li>v. Employee ID: 03611 (GSGE)</li> <li>vi. Employee ID: 03578 (GSGE)</li> </ul>	Complied
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>Sampled the payslip for contract worker with Passport No.: A5892257 was sighted and found the contractors were paid according to Minimum Wage Order 2016.</p> <p>Employment contracts for the contract workers were sighted and acknowledged by the workers prior to work.</p> <p>Interviews of contractors and the contractors' workers indicated that they understand the terms and conditions stated in the contract and according to the Minimum Wage Order 2016.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p><b>- Major compliance -</b></p>	<p>Genting Tanah Merah Estate and Genting Sri Gading Estate has recorded all the employees' details in the LintraMax system such as name, registration no., salary, date of birth, date joined, position. Sampled of Registration forms as below:</p> <ul style="list-style-type: none"> <li>i. Employee No.: 03050 (GTME)</li> <li>ii. Employee No.: 03026 (GTME)</li> <li>iii. Employee No.: 02998 (GTME)</li> <li>iv. Employee No.: 03413 (GSGE)</li> <li>v. Employee No.: 03611 (GSGE)</li> <li>vi. Employee No.: 03382 (GSGE)</li> </ul>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>All the employees that working in the estates consisted of local and foreign workers. There are direct employment and contract workers. All of them have signed on the offer date prior to work. Duration of contract, position offered, wages, annual leave was stated in the employment letter. Sampled of employment contracts/ extension contracts as below:</p> <ul style="list-style-type: none"> <li>i. Employee ID: 02983 (GTME)</li> <li>ii. Employee ID: 03048 (GTME)</li> <li>iii. Employee ID: 02700 (GTME)</li> <li>iv. Employee ID: 03413 (GSGE)</li> <li>v. Employee ID: 03578 (GSGE)</li> <li>vi. Employee ID: 03603 (GSGE)</li> </ul>	Complied

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4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. <b>- Major compliance -</b>	Genting Tanah Merah Estate and Genting Sri Gading Estate has recorded the overtime that carried out by workers in the Checkroll Book. All the overtime was paid according to the Checkroll Book and total overtime was shown in the payslip.	Complied
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. <b>- Major compliance -</b>	Interview with workers and document reviewed on the check roll logbook as well as payslip shown that the overtime payments are in accordance to law and workers are not forced to work overtimes.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. <b>- Major compliance -</b>	Sampled of the payslip for December 2017 for the overtime payment as below: i. Employee No.: 02968 for 57 hours ii. Employee No.: 03071 for 35 hours iii. Employee No.: 02992 for 78 hours iv. Employee No.: 02729 for 63 hours	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. <b>- Minor compliance -</b>	Interviews of local and foreign workers indicated satisfaction with the standard of housing and facilities. Besides, medical facilities such as clinic was provided to all the workers without any charges. Interviewed with the workers confirmed that the management has made contribution to them during festive season. On-job training was provided as well.	Complied

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4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.  - Major compliance -	All the residents in the company have access to facilities established by the company such as clinic, sports field, places of worship. Electricity and water are supplied by government with charges. The basic amenities and facilities were comply with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446)	Complied
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.  - Major compliance -	Genting Plantations Berhad has developed Sexual Harassment Policy dated 3/8/2009 where the company strive for a harassment-free environment and avoid behaviour that may create an atmosphere of hostility and intimidation of any kind at workplace. Interviewed with the internal and external stakeholders confirmed that was no sexual harassment case reported so far.	Complied
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.  - Major compliance -	Genting Plantations Berhad has developed People Policy dated 3/8/2009 where the company will respect the rights, freedom of association and equal opportunities of workers. Workers' Committee was established in Genting Tanah Merah Estate to discuss all the issues related to workers' welfare. The committee was formed by workers from different nationalities such as Indonesia, India, Bangladesh. The last meeting was conducted on 29/12/2017.  Joint Consultative Committee was also established in Genting Sri Gading Estate and the meeting will be conducted on quarterly basis. The last meeting was conducted on 15/12/2017. No issue was raised during the meeting.	Complied



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<b>4.4.5.14</b>	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantationd Berhad has developed People Policy dated 3/8/2009 where the company do not employ illegal workers nor exploit under aged children to work in their operation units. Document verified the List Name of Workers found that the company has recruited a worker at age 17 on 13/12/2017 for grass cutting activities with Employee No.: 03094 in Genting Tanah Merah Estate. Seen at the Social Policy where the company will not employed workers less than 15 years of age for full-time work and 18 years of age for hazardous work.</p> <p>Thus, a minor non-compliance was raised.</p>	Minor Nonconformance
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p><b>- Major compliance -</b></p>	<p>The training programme was established to include internal and external parties (contractors). Training Matrix was established to include, management, staff, workers, visitor and contractors.</p>	Complied
<b>4.4.6.2</b>	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p>	<p>This requirement has been established and sighted. It is adequate to address the requirement of the employees' training needs. Similar method for identifying the training needs are used in both estates and the mill. The details of the training needs include categories of job descriptions, sections, and employees group. Included in this program are subjects related to environment e.g. environmental, safety &amp; health policy, scheduled waste management, environmental</p>	Complied

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<p><b>- Major compliance -</b></p>	<p>responsibility, HCV &amp; Biodiversity training, field activities, equipment handling, vehicles maintenance.</p> <p>Training matrix was established by the management, eg: manuring gang, spraying, harvesting. A formal training programme on all aspects of MSPO requirement has been established and implemented. The training program for 2018 includes training for all categories of workers and contractors. Evidence of adequate and appropriate training on safe working practices provided to workers eg;</p> <p>A) GTME-chemical handling (5/9/17), harvesting (21/6/18), ERP (20/5/17), Manuring (6/4/17), 28/10/17 (Spraying), 19/9/17 (Triple rinsing, PPE, HIRARC), 20/1/18 (SOP for grinder), 19/1/18 (workshop), 12/1/18 (recycle waste training), 29/9/17 (contractor management)</p> <p>B) GSGE-nursery (29/12/17), workshop (28/12/17), motorised cutter (28/12/17), handling tractor (24/12/17), MSPO refreshment (13/12/17), rat baiting (25/11/17), buffer zone &amp; HCV (25/11/17), BOFA (21-22/11/17), Induction new workers (10/11/17), PPE (20/10/17), Spraying (11/10/17), harvesting (10/8/17), chemical handling (10/6/17), Manuring (6/4/17)</p> <p>C) GTBE- chemical handling (18/1/18), harvester training (17/1/18), manuring (14/12/17), nursery (3/2/17), spraying (3/2/17).</p>	
<p><b>4.4.6.3</b> A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p>	<p>The training program for 2018 includes training for all categories of workers and contractors. Evidence of adequate and appropriate training on safe working practices provided to workers eg;</p> <p>A) GTME-chemical handling (5/9/17), harvesting (21/6/18), ERP (20/5/17), Manuring (6/4/17), 28/10/17 (Spraying), 19/9/17</p>	<p>Complied</p>

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	- <b>Minor compliance</b> -	(Triple rinsing, PPE, HIRARC), 20/1/18 (SOP for grinder), 19/1/18 (workshop), 12/1/18 (recycle waste training), 29/9/17 (contractor management) B) GSGE-nursery (29/12/17), workshop (28/12/17), motorised cutter (28/12/17), handling tractor (24/12/17), MSPO refreshment (13/12/17), rat baiting (25/11/17), buffer zone & HCV (25/11/17), BOFA (21-22/11/17), Induction new workers (10/11/17), PPE (20/10/17), Spraying (11/10/17), harvesting (10/8/17), chemical handling (10/6/17), Manuring (6/4/17) C) GTBE- chemical handling (18/1/18), harvester training (17/1/18), manuring (14/12/17), nursery (3/2/17), spraying (3/2/17).	
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
<b>4.5.1.1</b>	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.  - <b>Major compliance</b> -	Environmental Policy was established, signed by President and Chief Operating Officer on 21 Dec 2009. The policy was communicated during Policy briefing which was conducted on 12/1/2018 (GTME) and 24/11/17 (GSGE). The environmental policy and management plan were effectively implemented	Complied
<b>4.5.1.2</b>	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations.	Environmental management plan was established at GSGE (dated 14/11/17) to include environmental policy, aspect impact, protection of HCV areas, air pollution, water pollution, noise pollution, GHG, waste management, water usage. Environmental objectives were established through the management plan, eg: No open burning, improve	Complied

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	- <b>Major compliance</b> -	<p>efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage and reduce wastage for water consumption.</p> <p>Environmental aspect impact assessment was established to include all the activities, eg: spraying, manuring, harvesting, pruning, efb application, chemical store activity, internal transport, upkeep &amp; maintenance work, workshop, linesite, water catchment pond, HCV, chemical mixing bay, landfill, nursery.</p>	
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- <b>Major compliance</b> -</p>	<p>Environmental management plan was established at GSGE (dated 14/11/17) to include environmental policy, aspect impact, protection of HCV areas, air pollution, water pollution, noise pollution, GHG, waste management, water usage. Environmental objectives were established through the management plan, eg: No open burning, improve efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage and reduce wastage for water consumption. This management plan was monitored on monthly basis.</p>	Complied
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- <b>Minor compliance</b> -</p>	<p>A programme to promote the positive impact was included in the environmental management plan.eg: reduce chemical exposure in sensitive area, regular maintenance of septic tank.</p>	Complied
4.5.1.5	<p>An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the</p>	<p>The training program for 2018 includes training for all categories of workers and contractors. Evidence of adequate and appropriate training provided to workers eg; GTME-chemical handling (5/9/17), Manuring (6/4/17), 28/10/17 (Spraying), 19/9/17 (Triple rinsing, PPE), 19/1/18 (workshop), 12/1/18 (recycle waste training), 29/9/17</p>	Complied

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	objectives. - <b>Major compliance</b> -	(contractor management) & GSGE-nursery (29/12/17), workshop (28/12/17), buffer zone & HCV (25/11/17), Spraying (11/10/17), chemical handling (10/6/17), Manuring (6/4/17).	
<b>4.5.1.6</b>	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - <b>Major compliance</b> -	The meeting was conducted 3 months/ once by the management. Records were available confirming that quarterly meetings had been held at the Estate. Refer meeting minutes (GTME)- #4: dated 27/11/17, #3: dated 29/8/17, #2: dated 24/5/17 Refer meeting minutes (GSGE)- #4: dated 15/12/2017, #3: dated 26/9/17, #2: dated 6/7/17	Complied
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>			
<b>4.5.2.1</b>	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - <b>Major compliance</b> -	Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Monitored diesel/mt FFB, for 2017 – 3.27 ltr/mt FFB. Electricity usage – 140,000kwh. This record was include the contractor.	Complied
<b>4.5.2.2</b>	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations.	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors,	Complied

Criterion / Indicator		Assessment Findings	Compliance
	This shall include fuel use by contractors, including all transport and machinery operations. <b>- Major compliance -</b>	including all transport and machinery operations was available in the respective estate yearly budgets.	
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible. <b>- Minor compliance -</b>	There was no opportunity to use renewable energy in both Estates.	Complied
<b>Criterion 4.5.3: Waste management and disposal</b>			
<b>4.5.3.1</b>	All waste products and sources of pollution shall be identified and documented. <b>- Major compliance -</b>	Identification, segregation and storage of waste was established to include source of waste at workshop, linesite, office, diesel tank, chemical store, fertilizer store, empty fertilizer bag store, empty container store, petrol/lubricant store, scheduled waste store, general store, mistblower store, premix area, clinic, shops, religious area, landfill area, recyclable waste store, vehicle garage and nursery.	Complied
<b>4.5.3.2</b>	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products <b>- Major compliance -</b>	Waste management plan was established by the estate to include pollution source, mitigation plan and monitoring.eg: source of waste and mitigation plan at workshop, linesite, office, diesel tank, chemical store, fertilizer store, empty fertilizer bag store, empty container store, petrol/lubricant store, scheduled waste store, general store, mistblower store, premix area, clinic, shops, religious area, landfill area, recyclable waste store, vehicle garage and nursery.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.5.3.3	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p><b>- Major compliance -</b></p>	<p>The procedure was established (Scheduled waste management, SMP-GPB-11, Rev:0, Dated 11/10/2013). AT GTME, The last disposal was done on 22/12/17 for SW408 (155kg), SW306 (120Ltr), SW305 (230Ltr), SW409 (95kg), SW410 (46pcs) by Southern Strength (M) Sdn Bhd. Sighted the license for the contractor, eg: License No: 004768, expiry:30/4/18. At GSGE, the last disposal was done on 28/12/17 for SW410 (64kg), SW110 (6kg), SW312 (22kg), SW408 (100kg), SW409 (118kg) by Southern Strength (M) Sdn Bhd. Sighted the license for the contractor. For clinical waste, the last disposal was done on 15/8/17 (0.6kg) by Kualiti Alam.</p>	Complied
4.5.3.4	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p><b>- Major compliance -</b></p>	<p>The management was carrying out triple rinsing for empty container. The empty container was recycling back to the supplier (G-Planter). The latest recycle was done on 16/2/2017.</p>	Complied
4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p><b>- Minor compliance -</b></p>	<p>Domestic waste was disposed as per SOP (Landfill and domestic waste management, SMP-GPB-12, Rev:01, Dated 1/12/2014) at landfill area (GTME-OP95C).</p>	Complied
<b>Criterion 4.5.4:</b> Reduction of pollution and emission			

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	An assessment of all polluting activities was established through the establishment of environmental management plan. Environmental management plan established at GSGE (dated 14/11/17) to include environmental policy, aspect impact, protection of HCV areas, air pollution, water pollution, noise pollution, GHG, waste management, water usage. Environmental objectives were established through the management plan, eg: No open burning, improve efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage and reduce wastage for water consumption. This management plan was monitored on monthly basis.	Complied
<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. <b>- Major compliance -</b>	Environmental management plan was established at GSGE (dated 14/11/17) to include environmental policy, aspect impact, protection of HCV areas, air pollution, water pollution, noise pollution, GHG, waste management, water usage. Environmental objectives were established through the management plan, eg: No open burning, improve efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage and reduce wastage for water consumption. This management plan was monitored on monthly basis.	Complied
<b>Criterion 4.5.5: Natural water resources</b>			
<b>4.5.5.1</b>	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a. Assessment of water usage and sources of supply.	Water management plan was established to include water pollution, water quality, drainage system, flood/water log, assessment of water usage, drought session with latest review made on 11/12/2017. The plan emphasized on the following areas. a) Water source b) Efficient use of water	Complied



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Criterion / Indicator	Assessment Findings			Compliance																											
<p>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities.</p> <p>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p><b>- Major compliance -</b></p>	<p>c) Renewability of water source  d) Avoidance of surface and ground water contamination</p> <p>Details of the action plan and monitoring among others are tabled as follows;</p> <table border="1" data-bbox="1048 639 1877 1327"> <thead> <tr> <th></th> <th>Areas of concerns</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1</td> <td rowspan="2">Water source</td> <td>Government Treated Water</td> <td>Supply to residential areas /complex for all divisions</td> </tr> <tr> <td>Water from catchment pond</td> <td>Use in nursery and irrigation projects</td> </tr> <tr> <td rowspan="3">2</td> <td rowspan="3">Efficient use of water</td> <td>Residential areas</td> <td>Monitoring of pipes leakages</td> </tr> <tr> <td>Optimize usage &amp; reduce wastage</td> <td>Spraying pump maintenance</td> </tr> <tr> <td>Education/training</td> <td>Promote water conservation &amp; awareness among employees</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">Renewability water source</td> <td>Rain water capture at catchment</td> <td>Monitoring of pond level</td> </tr> <tr> <td>Rain water harvest</td> <td>Collection and usage at workshop</td> </tr> <tr> <td>4</td> <td>Avoidance of surface/ground water</td> <td>Sewage and septic tank</td> <td>To ensure no leakage of sewage/septic tank functioning properly/cover available</td> </tr> </tbody> </table>				Areas of concerns	Action Plan	1	Water source	Government Treated Water	Supply to residential areas /complex for all divisions	Water from catchment pond	Use in nursery and irrigation projects	2	Efficient use of water	Residential areas	Monitoring of pipes leakages	Optimize usage & reduce wastage	Spraying pump maintenance	Education/training	Promote water conservation & awareness among employees	3	Renewability water source	Rain water capture at catchment	Monitoring of pond level	Rain water harvest	Collection and usage at workshop	4	Avoidance of surface/ground water	Sewage and septic tank	To ensure no leakage of sewage/septic tank functioning properly/cover available	
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Criterion / Indicator		Assessment Findings			Compliance
		contamination	Rubbish collection at line site	Collection 3x/week Landfill located 100m from residential areas. Recycling practices	
			Drainage system	Free flow drains & scheduled maintenance	
			Water pollution	Wash from chemical bays collected in sump for recycling Trap for oil constructed	
			Water quality	Sampling of water samples at various fields identified for river water sample. Establishment of riparian zone along natural water ways. Maintain the riparian buffer zone during replanting	
		Others	Flood /water logging areas	Monitoring of rainfall, Desilting drain program Monitoring of water level using yard stick Construction of MCP	
			Assessment of water usage	Guided by optimum ratio/volume per head. Usage is recorded and excessive consumption is investigated	

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Criterion / Indicator		Assessment Findings	Compliance												
		<p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones as commonly practiced within the industry. The buffer zones established are as following:</p> <table border="1"> <thead> <tr> <th>River width (Meters)</th> <th>Buffer Zone (Meters)</th> </tr> </thead> <tbody> <tr> <td>&gt;40</td> <td>50</td> </tr> <tr> <td>20-40</td> <td>40</td> </tr> <tr> <td>10-20</td> <td>20</td> </tr> <tr> <td>5-10</td> <td>10</td> </tr> <tr> <td>&lt;5</td> <td>5</td> </tr> </tbody> </table> <p>Water quality analysis was done twice a year. Last was done on 15/9/17 at GSGE. The report shown that the water quality between upstream and downstream sampling points does not show significant differences and were within limit ( as per national water quality standards for Malaysia, Class III). The analysis was done by Chemical Laboratory (M) Sdn bhd.</p> <p>Buffer zone was maintained accordingly. During site visit at P09A (GTME) and P01G (GSGE), the riparian was maintained accordingly.</p>	River width (Meters)	Buffer Zone (Meters)	>40	50	20-40	40	10-20	20	5-10	10	<5	5	
River width (Meters)	Buffer Zone (Meters)														
>40	50														
20-40	40														
10-20	20														
5-10	10														
<5	5														
<b>4.5.5.2</b>	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	There is no construction of bunds, weirs and dams across main rivers or waterways passing through all estates.	Complied												

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
4.5.5.3	<p>Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).</p> <p>- Minor compliance -</p>	<p>The management established silt pit, water conservation pit and water retention pond in the estates. During the site visit practices of water harvesting are noted mainly constructed on flat areas in both estates. There were construction of WCP = Water Conservation Pit ratio of 1 ha to 34 points. Road side pits were also available at every 3 palm rows, to divert in event of water overflowing and also to benefit the nearest palm at the pit end to obtain additional moisture. This is part of the common practices introduced within the Group Agriculture Procedures. In addition there were irrigation projects for both Estates. Potential fields have been identified and such areas will be irrigated to improve the moisture level for the palm growth.</p>	Complied
<b>Criterion 4.5.6:</b> Status of rare, threatened, or endangered species and high biodiversity value			
4.5.6.1	<p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species),</p>	<p>The assessment namely, "Inventory on HCV sites within Genting Plantation Bhd group estates (Central Region)" by S.K. Yap Forestry and Landscape Advisory Services on Feb-Mar 2010. Only HCV 1.4, HCV 4.2 and HCV 6 were identified at GTME and GSSE. Eg: steep area, rocky area, temple and cemetery.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<p>that could be significantly affected by the grower(s) activities.</p> <p><b>- Major compliance -</b></p>		
4.5.6.2	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a. Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b. Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p><b>- Major compliance -</b></p>	<p>There is 17 birds species (totally protected), 5 birds species (protected), 1 mammals species (totally protected) and 8 mammals species (protected) at GSGE as per HCV consultant done in August 2012. The management and monitoring plan for HCV areas and RTE species was established. Animal sighting book was established by the management. As todate, no RTE sighting was reported to the management.</p> <p>There is illegal hunting by the outsider. The management has launched the report to the Wildlife officer on 17/1/2018.</p>	Complied
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p><b>- Major compliance -</b></p>	<p>The management and monitoring plan for HCV areas and RTE species was established. There is 17 birds species (totally protected), 5 birds species (protected), 1 mammals species (totally protected) and 8 mammals species (protected) at GSGE as per HCV consultant done in August 2012.</p>	Complied
<b>Criterion 4.5.7: Zero burning practices</b>			
4.5.7.1	<p>Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has developed Land Clearing, Preparation, Planting and Legume Covers Establishment procedure with Doc. No. OPM 1: Page 1 of 21, Rev. June 2013. Burning is not allowed unless permitted by the Department of Environmental during the planting and replanting process. Besides, the company also established Zero</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Burning Policy dated 10/8/2011 where opening burning is strictly prohibited except prior approval from authorities. Site visit confirmed that no fire was used during replanting process.	
<b>4.5.7.2</b>	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop.  - <b>Major compliance</b> -	Not applicable for Genting Tanah Merah Estate and Genting Sri Gading Estate.	Complied
<b>4.5.7.3</b>	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws.  - <b>Major compliance</b> -	Not applicable for Genting Tanah Merah Estate and Genting Sri Gading Estate.	Complied
<b>4.5.7.4</b>	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.  - <b>Minor compliance</b> -	This is included in the specification of work orders in event of land preparation during a replanting. It is a standard practice in Genting Group and within the Industry. However there are variation of practices between inland and coastal estates. Trunk are felled and chipped without having to shred and windrowed in certain conditions. Adjustment of work requirement are finalised from the directive of the replanting unit and the Head Office.	Complied
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Site Management</b>			

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Criterion / Indicator		Assessment Findings	Compliance						
<b>4.6.1.1</b>	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has well established GENP’s Oil Palm Manual for monitoring and control of best practice implementation at the estates. Procedures of best practices were sighted as below:</p> <ul style="list-style-type: none"> <li>i. Oil palm Nursery Practices, Doc. No. OPM 2, Rev, June 2013</li> <li>ii. Pest and Diseases, Doc. No. OPM 5, Rev. June 2013</li> <li>iii. Weed Management, Doc. No. OPM 6, Rev. June 2013</li> <li>iv. Manuring of Oil Palm, Doc. No. OPM 7, Rev. June 2013</li> <li>v. Managing Difficult Soils, Doc. No. OPM 13</li> </ul> <p>Fertilizer application schedule was available and recommended by Genting Plantations Research Centre on annual basis. The last visit was carried out on 12-13/9/2017 for Genting Tanah Merah Estate and 21-22/3/2017 for Genting Sri Gading Estate.</p> <p>Workplace inspection was carried out on quarterly basis to ensure the work was carried out as per the SOP. The last inspection was done on 2/12/2017 by Assistant, Clerk, Mandore in Genting Tanah Merah Estate and 15/12/2017 for Genting Sri Gading Estate.</p>	Complied						
<b>4.6.1.2</b>	<p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p>	<p>Genting Plantations Berhad has developed Steep Land Management Procedure with Doc. No. SMP-GPB-10, Rev. 0 and Soil Conservation and Terracing SOP with Doc. No. OPM 4, Rev. June 2013. Seen the Slope map with GIS Date Processed: 19/6/2013 of Genting Tanah Merah Estate and Genting Sri Gading Estate as below;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Estate</th> <th style="width: 33%;">Slop Degree</th> <th style="width: 33%;">Area/ Percentage</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Estate	Slop Degree	Area/ Percentage				Complied
Estate	Slop Degree	Area/ Percentage							

Criterion / Indicator		Assessment Findings		Compliance		
	<b>- Major compliance -</b>	Genting Tanah Merah Estate	0° - 6°	1643.51 ha/ 92.66%		
			6° - 10°	79.20 ha/ 4.47%		
			10° - 15°	32.56 ha/ 1.84%		
			15° - 20°	14.77 ha/ 0.83%		
			20° - 25°	3.58 ha/ 0.20%		
			>25°	0.10 ha/ 0.01%		
		Genting Sri Gading Estate	0° - 2°	47.50%		
			2° - 6°	47.58%		
			6° - 12°	4.72%		
			12° - 20°	0.10%		
			>20°	0.10%		
		<p>Genting Tanah Merah Estate and Genting Sri Gading Estate has developed Soil Management Plan dated 24/8/2017 and 22/8/2017 where controlled of spraying at the high risk of soil erosion area, maintenance of ground vegetation such as legume during immaturity phase, T-shaped frond stacking. Planting of cover crop was sighted at the high soil erosion area as well. In Genting Sri Gading Estate, monitoring of pH level in the acid sulphate area was carried out on weekly basis. Flushing and desilting was carried out as well to maintain the area.</p>				



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Criterion / Indicator		Assessment Findings	Compliance						
<b>4.6.1.3</b>	<p>A visual identification or reference system shall be established for each field.</p> <p><b>- Major compliance -</b></p>	<p>All fields are marked and identified. Information like year planting (field no) and the total hectare is shown in all markers. There are both stenciled at the palm trees and also displayed in signage at the boundary/corners of every fields. This is observed during the field visit in Genting Sri Gading Estate, Genting Tebong Estate and Genting Tanah Merah Estates</p>	Complied						
<b>Criterion 4.6.2: Economic and financial viability plan</b>									
<b>4.6.2.1</b>	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has implemented a management system for monitoring and reporting of performance against production targets for achieving long-term economic and financial viability on daily basis. Seen the Daily Crop Tracking for December 2017.</p>	Complied						
<b>4.6.2.2</b>	<p>Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years.</p> <p><b>- Major compliance -</b></p>	<p>Seen the 5 years replanting program in Genting Tanah Merah Estate and Genting Sri Gading Estate. The total planned replanting for Y2018 was 61.66 ha in Block OP84A and OP84B for GTME and 166.60 ha in Field OP85D and OP86A.</p> <p>Genting Tebong Estates established a replanting program spanned over a 5 year period till 2022. All programs were sighted and recorded below;</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td>Financial Year</td> <td>2018</td> <td>2019</td> <td>2020</td> <td>2021</td> <td>2022</td> </tr> </table>	Financial Year	2018	2019	2020	2021	2022	Complied
Financial Year	2018	2019	2020	2021	2022				

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Criterion / Indicator		Assessment Findings						Compliance
		Replanting Ha	142.77	84.0 7	179.69	130. 96	133. 01	
		<p>Sizes of fields identified for replanting varies subject to factors i.e hilly, yield. All replanting program and planning in all the Group Estates are monitored by the Head Office. Assistance and visits are performed by SVP/GM for the approval of hectares, stand per ha</p>						
<b>4.6.2.3</b>	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> <li>a) Attention to quality of planting materials and FFB</li> <li>b) Crop projection: site yield potential, age profile, FFB yield trends</li> <li>c) Cost of production : cost per tonne of FFB</li> <li>d) Price forecast</li> <li>e) e) Financial indicators : cost benefit, discounted cash flow, return on investment</li> </ul> <p><b>- Major compliance -</b></p>	<p>Genting Tanah Merah Estate has an annual operating budget for the calendar year 2017 and 4 years projections (2019 - 2022) for production. The plan includes crop production, yield per ha. CAPEX was also sighted for building, roads &amp; bridges, furniture &amp; fitting.</p> <p>Genting Sri Gading Estate has annual operating and capital budget for fiscal year 2017. Seen the CAPEX for extension of workshop, install mosquitoes netting at labour quarters, mounding of ganoderma palm.</p> <p>Genting Tebong Estate - This requirement i.e. crop material, crop projection, yield, production cost are available. It is provided in the business management plan shown in item 4.6.2.1 above. The financial indicators: cost benefits, discounted cash flow, return on investment details are managed and kept in confidentiality at the Head Office level. The estates managed the financial elements through guidance of the approved budget. Deviation are sought to the higher superior level for any additional vote and projects if necessary.</p>						Complied

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.6.2.4</b>	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.  - <b>Major compliance</b> -	The estates performance is recorded in the monthly progress report. Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein. The management also provides variance report on the performance and reviewed on a monthly basis. The supervisory personnel maintained a daily cost for the field operations. The Regional meeting involving the Managers sits monthly with the Head Office Higher Management for the performance review.	Complied
<b>Criterion 4.6.3:</b> Transparent and fair price dealing			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented.  - <b>Major compliance</b> -	The pricing method has been clearly stated in the contract and contractors are explained on the term of contracts prior to the signing of contract. The company will paid to the Contractor within 30 days from the date of issuance of the Schedule of Work Completed.	Complied
<b>4.6.3.2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.  - <b>Major compliance</b> -	Sample contract and payment record verification with interviewed of contractors found the payments has been made as per contract. No delay in payment by the management of both Genting Sri Gading Estate, Genting Tanah Merah Estate and Genting Tebong Estate..	Complied
<b>Criterion 4.6.4:</b> Contractor			
<b>4.6.4.1</b>	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.  - <b>Major compliance</b> -	Genting Plantations Berhad has initiated the MSPO awareness to all its contractors. Interview with the contractors found that they understand on the MSPO requirements. Seen the Agreement that signed by the contractor and found that there was special clause under Clause 2.3 and Clause 4 for ISCC, RSPO and MSPO where the contractors shall comply with the requirements. Briefing of MSPO was conducted to the	Complied

Criterion / Indicator		Assessment Findings	Compliance
		contractors on 1/1/2018. Seen the attendance list of the briefing conducted.	
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	Sampled of agreement as below: i. Agreement No.: GTME/GWO/18/14 PCP valid from 1/1/2018 for loading and transporting work. ii. Agreement No.: GTME/GWO/18/02 CHF valid from 1/1/2018 for loading and transporting work. iii. Agreement No.: GSGE/HA/18/01/05 valid from 1/1/2018 for harvesting work. iv. Agreement No.: GSGE/GWO/18/01/03 valid from 1/1/2018 for harvesting work. Interviewed with the contractors found that they are understood and aware of the terms and conditions signed in the agreement.	Complied
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. <b>- Minor compliance -</b>	Genting Plantations Berhad has no objection to allow BSI auditors to verify the assessment through physical inspection if required.	Complied
<b>4.6.4.4</b>	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. <b>- Major compliance -</b>	Genting Plantations Berhad has initiated the MSPO awareness to all its contractors. Interview with the contractors found that they understand on the MSPO requirements. Seen the Purchase Summary/ Schedule of Work Completed Summary and tax invoice as below: i. Ref. No.: GTME/GTME171204 dated 9/12/2017 for November 2017 Invoice No. 2000412 dated 27/11/2017 from Tan Ah Sang, payment through online banking by Head Office on 22/12/2017 with Beneficiary Advice sighted.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	ii. Ref. No.: GST05122017 (LLH) dated 5/12/2017 for November 2017 Invoice No.: 00000095 dated 30/11/2017 from Low Lam Hoe, payment through online banking by Head Office on 6/12/2017 with Beneficiary Advice sighted.	
<b>4.7 Principle 7: Development of new planting</b>		
<b>Not applicable since there is no new planting at Genting Ayer Item Certification Unit</b>		

**B) MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill – Genting Ayer Item Oil Mill**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	Policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	The company has initiated the implementations of MSPO requirements. MSPO Policy has been established and signed by President & Chief Operating Officer dated 18/3/2014.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. <b>- Major compliance -</b>	The established policy has emphasized on the commitment to continual Improvement within the journey towards achieving sustainable palm oil.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	Internal audit was conducted accordingly at GAIOM. Audit covered both documentation and operation for the mill. The action from the finding raised was established.  However, the findings raised during internal audit conducted on January 2018 were only referenced to RSPO requirements in which the incompliance was not identified for MSPO. Thus, minor nonformance was raised.	Minor Nonconformance

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<p><b>4.1.2.2</b></p>	<p>The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.</p> <p><b>- Major compliance -</b></p>	<p>Internal Audit procedure was established, refer to Sustainability Management Procedure Manual (SMP-GPB-03), Revision:01 dated 11/12/2013. The procedure was mentioned about the audit criteria, audit schedule and audit plan, the role of Lead Auditor, Team member. The auditee need to identifies the corrective actions required to eliminate the non-conformity and its root cause. The auditee will implements the corrective actions according to the agreed plan. The audit documents and reports will be kept for a period of 10 years.</p>	<p>Complied</p>
<p><b>4.1.2.3</b></p>	<p>Reports shall be made available to the management for their review.</p> <p><b>- Major compliance -</b></p>	<p>Report of Internal Audit for GAIOM was available for review.</p>	<p>Complied</p>
<p><b>Criterion 4.1.3 – Management Review</b></p>			
<p><b>4.1.3.1</b></p>	<p>The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.</p> <p><b>- Major compliance -</b></p>	<p>Management Review procedure was established accordingly, refer to Sustainability Management Procedure Manual (SMP-GPB-06) Revision:00 dated 1/8/2013. The 1<sup>st</sup> MRM for MSPO was done on 12/1/2018 involved all the estate and mill personnel under Genting Ayer Item CU. All the agenda were discussed during MRM, eg: action of previous meeting, MSPO audit schedule and certification status, changes and improvement on Sustainability Management System, result of internal audit, complaint and grievances, enquiry register, stakeholder meeting, greenhouse gas, resources and training, sustainability policies, review of effectiveness in achieving quality, environmental, social, safety and health objectives, compliances to legal requirements, preventive action &amp; corrective actions and recommendations for improvement.</p>	<p>Complied</p>

<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	<p>The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.</p> <p><b>- Major compliance -</b></p>	<p>The mill has implemented several activities as part continual improvement plan. The activities including:</p> <ol style="list-style-type: none"> <li>1. Recycle water from coolant water and decanter coolant water into overhead lower water tank.</li> <li>2. Use water from overhead lower water tank for mill cleaning activities.</li> <li>3. Training employee on the use of recycle water for mill cleaning.</li> <li>4. Carry out inspection and maintenance to ensure no water pipe of valve leaking.</li> </ol> <p>The monitoring of the water usage is conducted objectively as the result of the monitoring has been transferred to actions to reduce water consumption.</p>	Complied
<b>4.1.4.2</b>	<p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.</p> <p><b>- Major compliance -</b></p>	<p>All the action plan established was brief to the employees accordingly during morning briefing.</p>	Complied
<b>4.2 Principle 2: Transparency</b>			
<b>Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements</b>			



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<p><b>4.2.1.1</b></p>	<p>The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.</p> <p><b>- Major compliance -</b></p>	<p>GAIOM has maintained records of enquiries, Land titles, OSH plans, policies, plans and impact assessments relating to environmental and social, plans for pollution prevention, records of complaints and grievances, plans for continuous improvement. All these documents and records are made available upon request by the stakeholders. Annual reports are available in the company's website which could be assess by the stakeholders. The company also issued a memo with all the documents/ reports and policies listed which made publicly available to the stakeholders.</p>	<p>Complied</p>
<p><b>4.2.1.2</b></p>	<p>The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p><b>- Major compliance -</b></p>	<p>GAIOM holds copies of each of the management documents that are required to be publicly available. Besides, all the information such as annual report, sustainability news, policies were found available in the company's website: <a href="http://www.gentingplantations.com">www.gentingplantations.com</a>.</p>	<p>Complied</p>
<p><b>Criterion 4.2.2 – Transparent method of communication and consultation</b></p>			
<p><b>4.2.2.1</b></p>	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has developed Consultation and Communication Procedure, Doc. No. SMP-GPB-17, Rev. 0, Issue Date: 11/10/2015. The objective of the procedure is to ensure effective of internal and external communication of sustainability requirements and responding to communications from interested parties. Two way communication process is practice in the company. The topics such as participation in decision making, complaints and grievances, FPIC will be discussed. All the issues will be handled by Manager.</p>	<p>Complied</p>
<p><b>4.2.2.2</b></p>	<p>The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i>.</p>	<p>The Manager of GAIOM has been appointed by Vice President of Plantation (WM) to be the Management Representative for ISCC, RSPO and MSPO related matters. The responsibilities of the MR</p>	<p>Complied</p>

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	- <b>Minor compliance</b> -	have been clearly stated in the appointment letter.	
<b>4.2.2.3</b>	<p>A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained.</p> <p>- <b>Major compliance</b> -</p>	<p>Stakeholder list for GAIOM was sighted which included contractors and suppliers, government authorities, local communities, smallholders.</p> <p>GAIOM has implemented Enquiry Register Book where all the stakeholders with requests will be recorded in the book. The request and response are in two way communication where the management will replied accordingly to all the requests by the stakeholders. The requesters will acknowledged on the book after actions have been taken by the management.</p> <p>Besides, stakeholder meeting with external stakeholders was conducted on yearly basis and the last meeting was held on 27/9/2017. Seen the action plan and evidence of action taken was sighted.</p> <p>However, the list of stakeholders wa not updated accordingly. For example, there is no contact details for Sekolah Agama Sri Maju Jaya and Tabika Kemas.Thus, a minor non-conformance was raised.</p>	Minor Nonconformance
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.	Genting Plantations Berhad has developed a Traceability Procedure with Doc. No. SMP-GPB-09, Rev. 02 dated 14/8/2014. The procedure has clearly explained to ensure the handling of outgoing FFB are carried out in proper manner.	Complied

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	- Major compliance -		
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Regular inspections on compliance with the established traceability system were conducted through periodical internal audit as specified in Criterion 4.1.2 of this checklist. Furthermore, a Standard Operating Procedure sighted available that described the routine responsibilities of mill management and staff to conduct related inspections on compliance of all operations including traceability system. Verification on site confirmed the inspections were regularly implemented accordingly.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	The Manager of GAIOM has been appointed by Vice President of Plantation (WM) to be the Management Representative for ISCC, RSPO and MSPO related matters. The responsibilities of the MR have been clearly stated in the appointment letter.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	Records of CPO & PK sales & delivery including Weighbridge Tickets together with sales Delivery Note (DO Chit) and Daily Record (Daily CPO/PK Despatch Summary Log Book) were maintained based on own established SOP.	Complied
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	The list of permit and license required for the operations of the mill was sighted and found valid.	Complied

<p><b>4.3.1.2</b></p>	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>The Legal Registers have included the required regulations to be followed by the operating units. The person responsible to ensure the legal registered are updated is the mill manager and the office clerk.</p> <p>The responsible personnel to ensure compliance on the legal requirement is Manager of the operating units and monitoring by Sustainability team through internal audit.</p>	<p>Complied</p>
<p><b>4.3.1.3</b></p>	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p><b>- Major compliance -</b></p>	<p>The oil mill maintain 2 legal register. For legal compliance related Environment, Safety and Health it is maintained by oil mill management while for social related legal compliance is maintained by Genting Plantation Sustainability team. Whenever there is legal changes on social related, it will be informed by the Sustainability team to operating units.</p> <p>Example of the latest changes in regulation has observed to be updated in the legal registers:</p> <ol style="list-style-type: none"> <li>1. Minimum Wages Rate has been identified in the Legal Requirement Register - document SMO-GPB-22 dated 10/08/2016.</li> </ol> <p>Factories and Machinery order 2017 on Schedule Unfired Pressure Vessel has been identified in the Evaluation of Compliance Checklist (only applicable to mill) dated 17/01/2018.</p>	<p>Complied</p>

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<p><b>4.3.1.4</b></p>	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p><b>- Minor compliance -</b></p>	<p>The Sustainability team together with the Group Human Resource is responsible to track the regulation changes. If there is any changes, the legal register will be updated accordingly and disseminated to operating unit.</p>	<p>Complied</p>
<p><b>Criterion 4.3.2 – Lands use rights</b></p>			
<p><b>4.3.2.1</b></p>	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p><b>- Major compliance -</b></p>	<p>Not applicable since the land title was kept under the estate.</p>	<p>Complied</p>
<p><b>4.3.2.2</b></p>	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.</p> <p><b>- Major compliance -</b></p>	<p>Not applicable since the land title was kept under the estate.</p>	<p>Complied</p>
<p><b>4.3.2.3</b></p>	<p>Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p><b>- Major compliance -</b></p>	<p>Not applicable since the land title was kept under the estate.</p>	<p>Complied</p>
<p><b>4.3.2.4</b></p>	<p>Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC).</p> <p><b>- Minor compliance -</b></p>	<p>There was no land dispute in the GAIOM.</p>	<p>Complied</p>
<p><b>Criterion 4.3.3 – Customary rights</b></p>			

4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land or negotiated agreements at Genting Ayer Item certification unit.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	There is no customary land or negotiated agreements at Genting Ayer Item certification unit.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	There is no customary land or negotiated agreements at Genting Ayer Item certification unit.	Complied
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Social Impact Assessment (SIA) & Human Rights Impact Assessment (HRIM) was carried out on 2/12/2016 and 4-6/1/2017 for Genting Ayer Item POM by Sustainability Department. The method of conducted the assessment was through consultation with relevant stakeholders such as internal workers, contractors, villagers and government officers. The areas covered during the consultation were such as channel of communication, safety & health, pay & condition, relationship and CSR, environment which included plan to mitigate the negative impacts and promote the positive ones. Human rights and freedom of association was discussed with the internal workers as well.	Complied
<b>Criterion 4.4.2: Complaints and grievances</b>			

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<p><b>4.4.2.1</b></p>	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has developed Complaints and Grievances Procedure with Doc. No. SMP-GPB-19, Rev. 02 dated 5/9/2014. The procedure is to provide guidelines on handling complaints &amp; grievances such as internal complaints, issues due to customary land rights, other external stakeholders. Time frame to solve the complaints and grievances is clearly defined in the flowchart which is 14 working days to acknowledge and respond upon receipt.</p>	<p>Complied</p>
<p><b>4.4.2.2</b></p>	<p>The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.</p> <p><b>- Major compliance -</b></p>	<p>Complaints/ Grievances Record Book was implemented in the estates of Genting Plantations Berhad.</p> <p>Seen the record book in Genting Tanah Merah Estate and most of the complaints were related to housing repair.</p>	<p>Complied</p>
<p><b>4.4.2.3</b></p>	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.</p> <p><b>- Minor compliance -</b></p>	<p>The mill management has maintained Complaint Form and Complaint Box outside the office where the internal and external stakeholders are able to lodge complaint anytime. Interviewed with the stakeholders confirmed that they are aware of the complaint procedure and understand their rights to lodge complaint.</p>	<p>Complied</p>
<p><b>4.4.2.4</b></p>	<p>Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.</p> <p><b>- Minor compliance -</b></p>	<p>Interviewed with the stakeholders such as contractor, school's representatives and government authorities found that they are aware of the complaint and grievance procedure.</p>	<p>Complied</p>
<p><b>4.4.2.5</b></p>	<p>Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.</p>	<p>Record review found that previous complaints and grievances from January 2015 to January 2018 was kept and maintained.</p>	<p>Complied</p>

	- Major compliance -		
<b>Criterion 4.4.3:</b> Commitment to contribute to local sustainable development			
<b>4.4.3.1</b>	<p>Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.</p> <p>- Minor compliance -</p>	<p>GAIOM has made contribution to the local communities and their workers such as provided hamper during festive season to the workers, sponsor of school bags to the children during new year, given groceries to the older, helped the school to pay electricity and water bill, provided football field to the school for their sport days. Interviewed with the stakeholders confirmed that the CSR was done by the company.</p>	Complied
<b>Criterion 4.4.4:</b> Employees safety and health			
<b>4.4.4.1</b>	<p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>The Group Occupational Safety &amp; Health Management Policy had been established and implemented for all Mills and Estates. The policy was signed by President and Chief Operating Officer on 1<sup>st</sup> July 2015 and displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH personnel from Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees &amp; contractors &amp; visitors. In interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the policy.</p>	Complied
<b>4.4.4.2</b>	<p>The occupational safety and health plan should cover the following:</p>	<p>a) Briefings to employees on safety policy are made through training and briefing forums. GAIPOM organised a session on 17/1/18. In addition there were also briefings at muster ground</p>	Complied



	<p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risk of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:</p> <ul style="list-style-type: none"> <li>i. All employees involved are adequately trained on safe working practices;</li> <li>ii. All precautions attached to products should be properly observed and applied;</li> </ul> <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept</p>	<p>being as refresher program for the employees. Safety procedures adherence are emphasised to the employees as part of the work culture. Content includes among others to prioritise safety, execute work safely, adhere all safety rules and regulations and to target zero accident. Safety policy and targets were available on display board printed in both English &amp; Bahasa Malaysia.</p> <p>b) The mill Identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment.</p> <p>Full review for the HIRARC was conducted by the ESH committee and no major changes were observed in term of hierarchy to determine appropriate control measures. They are made on annual basis or whenever a situation deemed necessary in event of accident or new machinery / work process. All HIRARC prepared were adequate to address any situation of the risk management. All HIRARC were verified and approved accordingly.</p> <p>c) The mill provides training to the workers and staff exposed to pesticides and chemicals. The following training sessions among others were recorded.</p> <table border="1" data-bbox="1086 1300 1870 1396"> <thead> <tr> <th>Date</th> <th>Training</th> </tr> </thead> <tbody> <tr> <td>12/7/17</td> <td>Chemical Management &amp; Emergency Response</td> </tr> </tbody> </table>	Date	Training	12/7/17	Chemical Management & Emergency Response	
Date	Training						
12/7/17	Chemical Management & Emergency Response						

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<p>ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	13/7/17	Chemical & CPO Spillage – ERT	
	26/6/17	SW Management – Chemical Containers	
	<p>Details of other training are available 4.4.6.1 (training and competency). OSH programs are also included. Common programs are initiated from HQ level e.g. OSH meeting, workplace inspection, inspection on PPE, training on MSPO/RSPO.</p> <p>d) The mill provides PPE to the employees relevant to the work handled by the workers. The list of PPE provided among others are as below: General Workers/Workshop Personnel /others Safety Helmet safety shoes hand gloves, leather gloves, luminous strip /jacket, dust mask Records of PPE issuance were sighted. During the mill site visit workers were observed to be in approved PPE.</p> <p>e) The following manuals contained SOP for chemical handling and used as a procedure in handling chemicals. Quality, Environmental, Safety &amp; Health Manual &amp; Sustainability Manual dated 01/7/17. Both were issued from Head Office and used in all operating units within the Group.</p> <p>f) The Mill Manager has been appointed as the Chairman of the ESH committee, letter of appointment dated 1/9/17 signed by the SVP – Group Processing. Inclusive for the Manager’s responsibilities are the Management Representative for the roles related to ISCC/RSPO/MSPO</p>		

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		<p>and QESHMS i.e ISO 9001, ISO14001, OHSAS 18001 and MS 1722. The mill engineers/executives take the delegation of similar functions as assigned by the Manager.</p> <p>g) The mill conducts regular two-way communication with its employees through the quarterly OSH meetings. The date of meetings held by both estates are recorded below.</p> <table border="1" data-bbox="1086 587 1713 837"> <thead> <tr> <th></th> <th>Date of meeting</th> <th>No of attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>05/12/17</td> <td>15</td> </tr> <tr> <td>2</td> <td>06/9/17</td> <td>14</td> </tr> <tr> <td>3</td> <td>17/8/17</td> <td>16</td> </tr> <tr> <td>4</td> <td>22/3/17</td> <td>14</td> </tr> </tbody> </table> <p>The minutes of meeting on 06/9/17 and 22/3/17 were sighted and verified. Workers during the meeting participated in the discussion mainly issues relating to line site and safety.</p> <p>h) The mill adhered to the requirement of the ERP Procedures in accordance to OSHA 1994 Act 514 Part IV. It is specified in the Mill Manual dated 01/7/2013 – System Procedure page 4 of 10. The series of the ERP Emergency Response Procedure include the following event of crisis;</p> <ul style="list-style-type: none"> <li>- Fire or Explosion</li> <li>- CPO or Chemical Spillage</li> <li>- Effluent Overflow or Bund Collapses</li> <li>- Accidents</li> </ul>		Date of meeting	No of attendees	1	05/12/17	15	2	06/9/17	14	3	17/8/17	16	4	22/3/17	14	
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		<p>- Miscellaneous events which resulted in actual/potential emergency situations.</p> <p>The mill had procedures as stipulated above and display at prominent places in the estates complex in both English and Bahasa Malaysia. The procedures were displayed at the office, Muster Ground, Workshop and Dispensary. Names of the members of the Emergency Response Team (ERT) and their contact numbers were communicated to all employees and displayed at notice boards. Telephone numbers of the nearest police station, Fire Brigade, Immigration Department and Hospital were also included.</p> <p>The following drills was organised in the mill in 2017</p> <table border="1" data-bbox="1086 837 1787 1093"> <thead> <tr> <th></th> <th>ERP/Drill</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Fire &amp; Evacuation</td> <td>10/8/17</td> </tr> <tr> <td>2</td> <td>Oil / Chemical Spillages</td> <td>12/7/17</td> </tr> <tr> <td>3</td> <td>Effluent Overflow</td> <td>26/7/17</td> </tr> <tr> <td>4</td> <td>Accident / Emergencies</td> <td>23/11/17</td> </tr> </tbody> </table> <p>The emergency preparedness checklist for "<i>Sistem Pengesanan Kebakaran Dan Pengosongan Kilang</i>" is available and sighted.</p> <p>This is part of the form recorded during the fire drill exercise</p> <p>i) Both estates trained their assigned employees for First Aid mainly those involved in the field operations held on 28/11/17 &amp;</p>		ERP/Drill	Date	1	Fire & Evacuation	10/8/17	2	Oil / Chemical Spillages	12/7/17	3	Effluent Overflow	26/7/17	4	Accident / Emergencies	23/11/17	
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		<p>20/6/17. Training program on the first Aider was organised on Group basis. The First Aid Kit (box) equipped with approved 16 items were available and replenished on a weekly basis. Distribution of the First Aid Kit for both the estates are made at the following places/personnel;</p> <ul style="list-style-type: none"> <li>- Office / AP Post /</li> <li>- Chemical Store / Fertiliser Store /</li> <li>- Workshop /</li> <li>- Field staff / Mandores.</li> </ul> <p>The boxes kept by the mandores were sighted during the field visit. Both estates had regular monthly briefing to the First Aid Kit holders on the management of the content and usage. The sessions were briefed by the HA/Executives</p> <p>j) Records of all accidents are kept in the <i>Laporan Statistik Kemalangan Bulanan</i>. The duration of storage is at minimum of 10 years. Accident incidences if any are reviewed during safety meetings. Accidents incidences in details from 2011 to 2017 were sighted. During the audit records from 2014 to 2017 was extracted and summarised below;</p> <table border="1" data-bbox="1086 1054 1823 1386"> <thead> <tr> <th>Type of cases</th> <th>2014</th> <th>2015</th> <th>2016</th> <th>2017</th> </tr> </thead> <tbody> <tr> <td>Minor Cases (&lt;4 days MC)</td> <td>1</td> <td>2</td> <td>3</td> <td>0</td> </tr> <tr> <td>Major Cases (&gt;4 days MC)</td> <td>2</td> <td>0</td> <td>0</td> <td>3</td> </tr> <tr> <td>Fatal Cases</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Total Cases</td> <td>3</td> <td>2</td> <td>5</td> <td>3</td> </tr> <tr> <td>Tot Lost Time Accident Cases</td> <td>3</td> <td>2</td> <td>3</td> <td>3</td> </tr> </tbody> </table>	Type of cases	2014	2015	2016	2017	Minor Cases (<4 days MC)	1	2	3	0	Major Cases (>4 days MC)	2	0	0	3	Fatal Cases	0	0	0	0	Total Cases	3	2	5	3	Tot Lost Time Accident Cases	3	2	3	3	
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		<table border="1"> <tr> <td>Total Lost Man days</td> <td>56</td> <td>5</td> <td>137</td> <td>110</td> </tr> <tr> <td>Total Lost Time Injuries-Hours</td> <td>448</td> <td>40</td> <td>1096</td> <td>880</td> </tr> </table> <p>The lowest accident recorded in 2015 at LTI of 40. Accident analysis are made in details i.e. graph / statistics to facilitate the trending and corrective / preventive measures to be taken. The HIRARC was reviewed accordingly. Submission of JKKP 6 to DOSH where required was complied under the legislative requirement.</p>	Total Lost Man days	56	5	137	110	Total Lost Time Injuries-Hours	448	40	1096	880	
Total Lost Man days	56	5	137	110									
Total Lost Time Injuries-Hours	448	40	1096	880									
<b>Criterion 4.4.5: Employment conditions</b>													
<b>4.4.5.1</b>	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has developed a Social Policy dated 22/6/2015 which was signed by top management with incorporating the Labour and Human Rights requirements. The company will respect and support the Universal Declaration of Human Rights. The policy was communicated to employee accordingly.</p>	Complied										
<b>4.4.5.2</b>	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantationd Berhad has developed People Policy dated 3/8/2009 where the company prohibit any form of violence, harassment or discrimination against race, religion, national origin, disability, pregnancy, age and gender. Inspection of a sample of pay slip and interviewed with the workers found that no any issues related to discrimination was reported.</p>	Complied										
<b>4.4.5.3</b>	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements.</p>	<p>There was contract agreement for staff and workers as well as contract workers. Pay and conditions are documented and are above the Minimum Wage Order 2016. Sampled of employment</p>	Complied										

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	<p>The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Sampled of payslip for February 2017, July 2017, September 2017, November 2017 and December 2017 as below:</p> <ul style="list-style-type: none"> <li>i. Employee No.: 00320 (GAIOM)</li> <li>ii. Employee No.: 00302 (GAIOM)</li> <li>iii. Employee No.: 02708 (GAIOM)</li> <li>iv. Employee No.: 2907F (GAIOM)</li> <li>v. Employee No.: 2916F (GAIOM)</li> </ul>	
<p><b>4.4.5.4</b></p>	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p><b>- Minor compliance -</b></p>	<p>Sampled the payslip for contract worker found the contractors were paid according to Minimum Wage Order 2016.</p> <p>Employment contracts for the contract workers were sighted and acknowledged by the workers prior to work.</p> <p>Interviews of contractors and the contractors' workers indicated that they understand the terms and conditions stated in the contract and according to the Minimum Wage Order 2016.</p>	<p>Complied</p>
<p><b>4.4.5.5</b></p>	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p><b>- Major compliance -</b></p>	<p>Genting Tanah Merah Estate and Genting Sri Gading Estate has recorded all the employees' details in the LintraMax system such as name, registration no., salary, date of birth, date joined, position. Sampled of Registration forms as below:</p> <ul style="list-style-type: none"> <li>i. Employee No.: 00320 (GAIOM)</li> <li>ii. Employee No.: 00302 (GAIOM)</li> <li>iii. Employee No.: 02708 (GAIOM)</li> <li>iv. Employee No.: 2907F (GAIOM)</li> </ul>	<p>Complied</p>

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		v. Employee No.: 2916F (GAIOM)	
<b>4.4.5.6</b>	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.  - Major compliance -	All the employees that working in the mill consisted of local and foreign workers. There are direct employment and contract workers. All of them have signed on the offer date prior to work. Duration of contract, position offered, wages, annual leave and was stated in the employment letter. Sampled of employment contracts/ extension contracts as below: i. Employee No.: 00320 (GAIOM) ii. Employee No.: 00302 (GAIOM) iii. Employee No.: 02708 (GAIOM) iv. Employee No.: 2907F (GAIOM) v. Employee No.: 2916F (GAIOM)	Complied
<b>4.4.5.7</b>	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.  - Major compliance -	GAIOM has recorded the overtime that carried out by workers in the Checkroll Book. All the overtime was paid according to the Checkroll Book and total overtime was shown in the payslip.	Complied
<b>4.4.5.8</b>	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.  - Major compliance -	Interview with workers and document reviewed on the check roll logbook as well as payslip shown that the overtime payments are in accordance to law and workers are not forced to work overtimes.	Complied
<b>4.4.5.9</b>	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.  - Major compliance -	Sampled of the payslip for December 2017 for the overtime payment as below: v. Employee No.: 00320 (GAIOM) vi. Employee No.: 00302 (GAIOM) vii. Employee No.: 02708 (GAIOM)	Complied



		viii. Employee No.: 2907F (GAIOM) ix. Employee No.: 2916F (GAIOM)	
<b>4.4.5.10</b>	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.  <b>- Minor compliance -</b>	Interviews of local and foreign workers indicated satisfaction with the standard of housing and facilities. Besides, medical facilities such as clinic was provided to all the workers without any charges. Interviewed with the workers confirmed that the management has made contribution to them during festive season. On-job training was provided as well.	Complied
<b>4.4.5.11</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.  <b>- Major compliance -</b>	All the residents in the company have access to facilities established by the company such as clinic, sports field, places of worship. Electricity and water are supplied by government with charges. The basic amenities and facilities were comply with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446)	Complied
<b>4.4.5.12</b>	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.  <b>- Major compliance -</b>	Genting Plantations Berhad has developed Sexual Harassment Policy dated 3/8/2009 where the company strive for a harassment-free environment and avoid behaviour that may create an atmosphere of hostility and intimidation of any kind at workplace. Interviewed with the internal and external stakeholders confirmed that was no sexual harassment case reported so far.	Complied
<b>4.4.5.13</b>	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.  <b>- Major compliance -</b>	Genting Plantations Berhad has developed People Policy dated 3/8/2009 where the company will respect the rights, freedom of association and equal opportunities of workers. Workers' Committee was established in GAIOM to discuss all the issues related to workers' welfare. The committee was formed by workers from different nationalities such as Indonesia, India, Bangladesh.	Complied

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<p><b>4.4.5.14</b></p>	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantation Berhad has developed People Policy dated 3/8/2009 where the company do not employ illegal workers nor exploit under aged children to work in their operation units. Document verified the List Name of Workers found that GAIOM has not recruited a children and young workers.</p>	<p>Complied</p>																											
<p><b>Criterion 4.4.6: Training and competency</b></p>																														
<p><b>4.4.6.1</b></p>	<p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p><b>- Major compliance -</b></p>	<p>Genting Ayer Item Mill has organised trainings for its employees. There were also sessions held with presence of contractors and neighboring community. Records of training among others are shown below;</p> <table border="1" data-bbox="1084 836 1827 1378"> <thead> <tr> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>19/2/17</td> <td>Environmental Control Procedure</td> <td>16</td> </tr> <tr> <td>28/11/17</td> <td>CPR /AED</td> <td>14</td> </tr> <tr> <td>24/10/17</td> <td>Store Operating Procedure</td> <td>7</td> </tr> <tr> <td>22/10/17</td> <td>Latihan Pengosongan Kilang</td> <td>Entire mill</td> </tr> <tr> <td>1/10/17</td> <td>SOP- Working At Height</td> <td>25</td> </tr> <tr> <td>22/9/17</td> <td>Corrective &amp; Preventive Actions</td> <td>8</td> </tr> <tr> <td>18/9/17</td> <td>IP/ISCC – Briefing</td> <td>7</td> </tr> <tr> <td>4-5/9/17</td> <td>AESP – Competent Training</td> <td>4</td> </tr> </tbody> </table>	Date	Subject	Attendees	19/2/17	Environmental Control Procedure	16	28/11/17	CPR /AED	14	24/10/17	Store Operating Procedure	7	22/10/17	Latihan Pengosongan Kilang	Entire mill	1/10/17	SOP- Working At Height	25	22/9/17	Corrective & Preventive Actions	8	18/9/17	IP/ISCC – Briefing	7	4-5/9/17	AESP – Competent Training	4	<p>Complied</p>
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<b>4.4.6.2</b>	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.	This requirement has been established and sighted. It is adequate to address the requirement of the employees' training needs. Similar method for identifying the training needs are used in both estates and the mill. The details of the training needs include categories of job descriptions, sections, and	Complied																																																

	- <b>Major compliance</b> -	employees group. Included in this program are subjects related to environment e.g. environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training, field activities, equipment handling, vehicles maintenance.	
4.4.6.3	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.  - <b>Minor compliance</b> -	Training details are planned and summarized in the Annual Training Program 2018. This is in compliance and detailed in 4.4.6.1 above. Training program are made on annual basis. In addition it is subject to review during the financial year should need arises.	Complied
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.  - <b>Major compliance</b> -	The Group Environmental Policy had been established and implemented for all Mills and Estates. The policy was signed by the President / Chief Operating Officer of Genting Plantations Bhd dated 21 Dec 2009 and displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented along with other Policies through the OSH activities by the on-site Safety Officers and monitored by OSH/Sustainability Unit from Head Office. Included in the Policy among others are the following commitment; a) Commitment and protection of the environment according to the applicable laws.	Complied

		<p>b) Establishment of environmental management plan developed from results of aspect and impact analysis, mitigation, monitoring plans and records of implementation with timelines.</p> <p>c) Continual improvement program</p> <p>d) Awareness through training / briefing program &amp; session to all employees and stakeholders.</p> <p>During interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the basic objectives and intention of the Policy.</p>																	
<p><b>4.5.1.2</b></p>	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations</p> <p><b>- Major compliance -</b></p>	<p>The mill has identified the environmental objectives for implementation in 2018 among others as stated below;</p> <table border="1" data-bbox="1088 815 1865 1050"> <thead> <tr> <th colspan="2">Environmental Objectives</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>To reduce diesel consumption for gen-sets to a level of 100,000 litres /year</td> </tr> <tr> <td>2</td> <td>To reduce BOD3 level at the final discharge from 280 ppm</td> </tr> <tr> <td>3</td> <td>To reduce black smoke emission not exceeding 20%</td> </tr> <tr> <td>4</td> <td>To normalise usage of water for every 1 tonne of FFB processed equal or lesser than 1.5 m3 per year</td> </tr> </tbody> </table> <p>The aspects and impacts of all operations has been identified and formalised among others as described in the following environment improvement and management plan. It is being reviewed on yearly basis.</p> <table border="1" data-bbox="1088 1214 1843 1345"> <thead> <tr> <th>Source</th> <th>Negative Impacts</th> </tr> </thead> <tbody> <tr> <td colspan="2"><i>Water</i></td> </tr> <tr> <td>Consumption of water for mill operation/residence</td> <td>Water wastage</td> </tr> </tbody> </table>	Environmental Objectives		1	To reduce diesel consumption for gen-sets to a level of 100,000 litres /year	2	To reduce BOD3 level at the final discharge from 280 ppm	3	To reduce black smoke emission not exceeding 20%	4	To normalise usage of water for every 1 tonne of FFB processed equal or lesser than 1.5 m3 per year	Source	Negative Impacts	<i>Water</i>		Consumption of water for mill operation/residence	Water wastage	<p>Minor Nonconformance</p>
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<p><b>4.5.1.3</b></p>	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>The improvement and mitigation plan as initiated are given in the following table.</p> <table border="1"> <thead> <tr> <th data-bbox="1093 1318 1473 1353">Negative Impact</th> <th data-bbox="1473 1318 1868 1353">Improvement/Mitigation Plan</th> </tr> </thead> </table>	Negative Impact	Improvement/Mitigation Plan	<p>Complied</p>														
Negative Impact	Improvement/Mitigation Plan																		

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		Water wastage	Optimise usage & reduce wastage		
		Loss of habitat, food resources & breeding	Isolate the treated & contaminated water from discharge to monsoon drain		
		Poor water quality for consumption	To ensure the water usage used as necessary to prevent depletion of clean water sources.		
		Mill waste by product bunch ash/boiler ash.	To expedite evacuation of bunch ash and boiler ash by estate		
		Mill effluent / POME	To reduce BOD level at final discharge <280 ppm. To prevent overflowing during pumping into flatbeds		
		Flooding due to exposure surface for soil erosion by construction	To ensure the surface exposed being covered & well maintained		
		Hearing impairment to employees	To control noise generated from mil operation through audiometric monitoring		
		Emission of methane from POME	To carry out CDM project to tarp the methane gas To effectively manage the GEO Tube application		
		All action are to be monitored on the indicated frequency shown in the plan.			

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<p><b>4.5.1.4</b></p>	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p><b>- Minor compliance -</b></p>	<p>This is available and compiled and incorporated in the details as provided in 4.5.1.3 above.</p>	<p>Complied</p>
<p><b>4.5.1.5</b></p>	<p>An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives.</p> <p><b>- Major compliance -</b></p>	<p>A training program is available in the Mill Training Plan updated on yearly basis and revised as per the management requirement. Included in this plan is the internal and external program. Subjects among others identified related to environment are;</p> <ul style="list-style-type: none"> <li>a) EPMC – Role &amp; Function of environmental performance monitoring</li> <li>b) Departmental policy &amp; objectives 2018</li> <li>c) ERT POME overflow/pipe leaking</li> <li>d) SW Management</li> <li>e) GHG</li> </ul>	<p>Complied</p>
<p><b>4.5.1.6</b></p>	<p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p><b>- Major compliance -</b></p>	<p>Trainings relating to environmental are held by the mill. Sighted training sessions in relation to briefings on environmental subjects i.e. EPMC, air pollution, water pollution &amp; SW management, domestic waste held on 07/1/17, 10/5/17, 12/7/17,13/7/17 and 26/7/17. Environmental issues are also discussed during the EPMC meetings &amp; also touched during the ESH meetings. In addition employees were briefed during the weekly muster.</p>	<p>Complied</p>
<p><b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b></p>			
<p><b>4.5.2.1</b></p>	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period</p>	<p>Monthly and annual records on energy consumption for non-renewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Sighted tabulation of data maintained by the mill.</p> <ul style="list-style-type: none"> <li>- Diesel l/mt FFB and diesel l/mt CPO ratio from 2012–2017</li> </ul>	<p>Complied</p>



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**- Major compliance -**

	Year	Diesel /mt FFB	Diesel /mt CPO
1	2012	0.32	1.65
2	2013	0.16	0.83
3	2014	0.11	0.78
4	2015	0.27	1.30
5	2016	0.49	2.42
6	2017	0.26	1.32

Performance of /mt FFB above vary from lowest 0.11 to highest 0.49 over a span of 5 years. There were variation in baseline figures between the mills in the Group attributed by factors i.e. mill throughput, design, machine line up and technology input, no of diesel engine. The Mill had management plan dated 11/8/2018 to improve the efficiency of diesel usage and to optimize renewable energy details of which are shown below;

	Specific Concerns		Management Plan objectives & targets
1	Diesel usage	Continuous running engine by tractors/lorries	Drivers to OFF engine where parking is >3 min.
		Diesel consumption by gen-set during unstable operations /insufficient fiber supply to boiler	Maintain operations 3 presses for stable fiber supply to boiler. To carry out preventive maintenance to prevent high b/down hrs. To make scheduled boiler inspection.

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		2	GHG Emission (diesel)	Optimum diesel consumption by diesel gen set & mill vehicles	Operating diesel gen set only during non-processing hours. Regular checking on vehicle condition & maintenance upon diesel leaking.	
		3	Internal mill vehicle	FFB cages push in & out	To use winch for FFB cages push in & out from sterilizer & unloading ramp.	
		4	Diesel usage/year	To maintain and reduce diesel consumption	To consume diesel not > 100,000 litres/year Change diesel gen set to TNB during non-processing hours.	
<p><b>4.5.2.2</b></p>	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p><b>- Major compliance -</b></p>	<p>The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel used by contractors, including all transport and machinery operations are available in the mill annual budget. This was sighted in the 2018 annual estimate..</p>				<p>Complied</p>
<p><b>4.5.2.3</b></p>	<p>The use of renewable energy should be applied where possible.</p> <p><b>- Minor compliance -</b></p>	<p>The fibre and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fibre are delivered to estates for multi purposes or sold to outside buyers. EFB is used in the estates for mulching. The quantum of fibre and shell produced from the mill processing is calculated based on the mass ratio i.e. shell and fibre approx. at 7% and 6 % of the FFB respectively.</p>				<p>Complied</p>

		<p>The ratio of fibre/shell utilized in the boiler is recorded as follows;</p> <table border="1" data-bbox="1106 459 1711 726"> <thead> <tr> <th></th> <th>Year</th> <th>Diesel /mt FFB</th> <th>Diesel /mt CPO</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2012</td> <td>0.178</td> <td>0.911</td> </tr> <tr> <td>2</td> <td>2013</td> <td>0.190</td> <td>0.957</td> </tr> <tr> <td>3</td> <td>2014</td> <td>0.170</td> <td>0.818</td> </tr> <tr> <td>4</td> <td>2015</td> <td>0.179</td> <td>0.884</td> </tr> <tr> <td>5</td> <td>2016</td> <td>0.195</td> <td>0.961</td> </tr> <tr> <td>6</td> <td>2017</td> <td>0.191</td> <td>0.967</td> </tr> </tbody> </table>		Year	Diesel /mt FFB	Diesel /mt CPO	1	2012	0.178	0.911	2	2013	0.190	0.957	3	2014	0.170	0.818	4	2015	0.179	0.884	5	2016	0.195	0.961	6	2017	0.191	0.967	
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<p><b>4.5.3.1</b></p>	<p>All waste products and sources of pollution shall be identified and documented. <b>- Major compliance -</b></p>	<p>All waste and pollution are identified and documented in the Waste Management. The compilation for 2018 was guided by the Sustainability Department applicable to both estates and mills. Details of waste generated and the source arising from the mill operations/activities among others are shown below;</p> <table border="1" data-bbox="1084 992 1861 1388"> <thead> <tr> <th>Type of waste</th> <th>Location/Source</th> </tr> </thead> <tbody> <tr> <td>Domestic waste -rubbish</td> <td>Line sites, office, workshop, store,</td> </tr> <tr> <td>Industrial Waste -Scrap metal</td> <td>Workshop operations</td> </tr> <tr> <td>Recyclable Waste -Plastic, glass, paper</td> <td>Line site, office, residential complex</td> </tr> <tr> <td>Scheduled Waste 404 Clinical waste</td> <td>clinic</td> </tr> <tr> <td>Scheduled Waste rags, plastics, filters,</td> <td>Mill processing activities Workshop</td> </tr> <tr> <td>Scheduled Waste</td> <td>Workshop</td> </tr> </tbody> </table>	Type of waste	Location/Source	Domestic waste -rubbish	Line sites, office, workshop, store,	Industrial Waste -Scrap metal	Workshop operations	Recyclable Waste -Plastic, glass, paper	Line site, office, residential complex	Scheduled Waste 404 Clinical waste	clinic	Scheduled Waste rags, plastics, filters,	Mill processing activities Workshop	Scheduled Waste	Workshop	<p>Complied</p>														
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<p><b>4.5.3.2</b></p>	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p><b>- Major compliance -</b></p>	<p>The waste management plan for 2018 was compiled on 15/12/17 and has been implemented. Details as follows;</p> <table border="1"> <thead> <tr> <th data-bbox="1077 756 1317 793">Type of waste</th> <th data-bbox="1317 756 1870 793">Action to be taken</th> </tr> </thead> <tbody> <tr> <td data-bbox="1077 793 1317 888">Domestic waste -rubbish</td> <td data-bbox="1317 793 1870 888">Collection/disposal 3x/week to the estate designated landfill. Method used is sandwich method filled up with soil 1-2 ft 1x/week</td> </tr> <tr> <td data-bbox="1077 888 1317 957">Industrial Waste -Scrap metal</td> <td data-bbox="1317 888 1870 957">Inventory maintained, tender at zone level for sale to licensed contractors</td> </tr> <tr> <td data-bbox="1077 957 1317 1085">Recyclable Waste -Plastic, glass, paper</td> <td data-bbox="1317 957 1870 1085">Storage and later for sale to licensed buyers every quarterly.</td> </tr> <tr> <td data-bbox="1077 1085 1317 1212">Scheduled Waste 404 Clinical waste</td> <td data-bbox="1317 1085 1870 1212">Inventory maintained. Storage in sharp bin in clinic. Disposal through VMO clinic.</td> </tr> <tr> <td data-bbox="1077 1212 1317 1347">Scheduled Waste rags, plastics, filters,</td> <td data-bbox="1317 1212 1870 1347">Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor.</td> </tr> </tbody> </table>	Type of waste	Action to be taken	Domestic waste -rubbish	Collection/disposal 3x/week to the estate designated landfill. Method used is sandwich method filled up with soil 1-2 ft 1x/week	Industrial Waste -Scrap metal	Inventory maintained, tender at zone level for sale to licensed contractors	Recyclable Waste -Plastic, glass, paper	Storage and later for sale to licensed buyers every quarterly.	Scheduled Waste 404 Clinical waste	Inventory maintained. Storage in sharp bin in clinic. Disposal through VMO clinic.	Scheduled Waste rags, plastics, filters,	Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor.	<p>Complied</p>
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		Scheduled Waste Spent lubricant & hydraulic oil	Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor	
		Scheduled Waste Disposed containers, bags, equipment contaminated with chemicals (Boiler Treatment),	Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by authorized vendor..	
		Biomass Waste Fiber /Shell	Reuse as fuel in the boiler combustion	
4.5.3.3	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p><b>- Major compliance -</b></p>	<p>The above initiative and management plan is also a common practice within the industry elsewhere.</p> <p>The procedures for handling used chemicals classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by Head Office personnel and implemented in all estates and mills for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows;</p> <ul style="list-style-type: none"> <li>a) Management of class 1 chemical containers</li> <li>b) Management of class 2 (and higher) chemical containers.</li> <li>c) Management of fertilizer bags</li> </ul> <p>These documents were established on 13/8/2009 (OSH Manual) and 01/8/2013 (Sustainability Manual) and remained effective for practice in all estates and mills.</p>	<p>complied</p>	

<p><b>4.5.3.4</b></p>	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p><b>- Major compliance -</b></p>	<p>Under the operational control procedure established as given in 4.5.3.3 above the guideline and practice for handling empty pesticides containers are as follows;</p> <ul style="list-style-type: none"> <li>a) All class 2 and above containers are tripled rinsed and holes punctured at the bottom only if the waste generator is to dispose as non-scheduled waste.</li> <li>b) Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process.</li> </ul> <p>These guidelines are based on Department Of Agriculture ref 91/120/038/014 dated 7/11/2002. During the site visit this has been adhered mainly containers are tripled rinsed and holes punctured at the container base.</p>	<p>Complied</p>											
<p><b>4.5.3.5</b></p>	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p><b>- Minor compliance -</b></p>	<p>Both the estates/mill disposed their domestic waste to the designated landfill located in the host estate. All domestic waste are collected 3x /week by the estate management and filled with soil 1-2 ft (sandwich method) once a week.</p>	<p>Complied</p>											
<p><b>4.5.4.1</b></p>	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.</p> <p><b>- Major compliance -</b></p>	<p>This is available in the Mill Pollution Prevention Plan 2018. This document was prepared and approved on 12/12/2017. Among others the mill has identified activities producing pollution in the following in the 2018 plan.</p> <table border="1" data-bbox="1086 1193 1845 1394"> <thead> <tr> <th></th> <th>Pollution Source</th> <th>Specific Concern</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1</td> <td rowspan="2">FFB Receiving</td> <td>Air Pollution</td> </tr> <tr> <td>Noise Pollution</td> </tr> <tr> <td rowspan="2">2</td> <td rowspan="2">Vehicle parking area</td> <td>Water &amp; soil pollution due to leakages from vehicles</td> </tr> <tr> <td>Generation of scheduled waste</td> </tr> </tbody> </table>		Pollution Source	Specific Concern	1	FFB Receiving	Air Pollution	Noise Pollution	2	Vehicle parking area	Water & soil pollution due to leakages from vehicles	Generation of scheduled waste	<p>Complied</p>
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<p><b>4.5.4.2</b></p>	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p><b>- Major compliance -</b></p>	<p>The action plan/mitigation measures taken to reduce the identified pollutants are described in the following;</p> <table border="1"> <thead> <tr> <th data-bbox="1077 762 1144 794"></th> <th data-bbox="1144 762 1368 794">Pollution Source</th> <th data-bbox="1368 762 1877 794">Action Plan/Mitigation Measures</th> </tr> </thead> <tbody> <tr> <td data-bbox="1077 794 1144 1023">1</td> <td data-bbox="1144 794 1368 1023">FFB Receiving</td> <td data-bbox="1368 794 1877 1023">                     Regular servicing maintenance of vehicles/machinery                      Engine OFF while awaiting entrance to the ramp                      Ensure major traffic areas are away from residential complex, signage on speed limit,                 </td> </tr> <tr> <td data-bbox="1077 1023 1144 1187">2</td> <td data-bbox="1144 1023 1368 1187">Vehicle parking area</td> <td data-bbox="1368 1023 1877 1187">                     Tray provided for the drivers to be used underneath their vehicle during stationary.                      Used gloves &amp; contaminated fibre to treat as scheduled waste.                 </td> </tr> <tr> <td data-bbox="1077 1187 1144 1345">3</td> <td data-bbox="1144 1187 1368 1345">FFB sterilisation</td> <td data-bbox="1368 1187 1877 1345">                     Install &amp; maintain oil trap at monsoon drains if steriliser condensate is leaking.                      Discharge steriliser condensate into sludge pit for recovery purposes                 </td> </tr> </tbody> </table>		Pollution Source	Action Plan/Mitigation Measures	1	FFB Receiving	Regular servicing maintenance of vehicles/machinery Engine OFF while awaiting entrance to the ramp Ensure major traffic areas are away from residential complex, signage on speed limit,	2	Vehicle parking area	Tray provided for the drivers to be used underneath their vehicle during stationary. Used gloves & contaminated fibre to treat as scheduled waste.	3	FFB sterilisation	Install & maintain oil trap at monsoon drains if steriliser condensate is leaking. Discharge steriliser condensate into sludge pit for recovery purposes	<p>Complied</p>						
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				<p>Used glove &amp; contaminated fibre to treat as scheduled waste.</p>			
<p><b>4.5.4.3</b></p>	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p><b>- Major compliance -</b></p>	<p>4</p>	<p>CPO Clarification</p>	<p>Install &amp; maintain high level siren at sludge tank, hot water tank &amp; CPO tank            Channel all spillages to sludge pit for recovery purposes.            Recover oil from sludge pit to oil room for reprocessed.            Regular service &amp; maintenance of machinery            Containment via bunds for machinery/gearbox</p>	<p>Complied</p>		
				<p>5</p>	<p>Nut cracking &amp; CPK Production</p>	<p>Install cover plate at particular machine e.g. cracker mixture.            Reduce the frequency of floor washing</p>	
				<p>The treated mill effluent discharge is regularly monitored as prescribed in the "Jadual Pematuhan" license issued to the mill. The limit for the Biochemical Oxygen Demand (BOD) discharge is 500 mg/l for land application. The mill had an extra innovative with the installation of <i>GEO TUBE</i> along the treatment process line. This installation is purposed to reduce the solid content of the effluent thus reducing the frequency to disludging the treatment ponds. Regular monitoring is made on monthly basis and quarterly. In addition daily site checking on the effluent ponds are made by the supervisory personnel and effluent attendants. Reports for the effluent parameters are submitted using "<i>Borang Penyata Suku Tahun</i>" to DOE for compliance. Sighted the effluent results in the laboratory at random and all parameters are in compliance to the DOE requirement.</p>			



		Date		BOD Level mg/l	
		1	3/10/17	165	
		2	7/11/17	108	
		3	5/12/17	116	

<b>Criterion 4.5.5: Natural water resources</b>																		
<b>4.5.5.1</b>	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> <li>a) Assessment of water usage and sources.</li> <li>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</li> <li>c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> </ul> <p><b>- Major compliance -</b></p>	<p>The Water Management Plan for the mill has been established. with latest review on 15/12/2017. The plan emphasized on the following areas.</p> <ul style="list-style-type: none"> <li>e) Water source</li> <li>f) Efficient use of water</li> <li>g) Renewability of water source</li> <li>h) Avoidance of surface and ground water contamination</li> </ul> <p>Details of the action plan and monitoring among others are tabled as follows;</p>			Complied													
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			Optimize usage & reduce wastage	Recycle coolant water from engine room back to water system. Reduce floor washing by sweeping.
			Education/training	Promote water conservation/awareness among employees
	3	Renewability water source	Rain water capture at catchment	Monitoring of pond level and daily rainfall.
			Rain water harvest	Collection through gutter and usage for floor cleaning.
	4	Avoidance of surface/ground water contamination	Contamination of surface and ground water through run-off soil, nutrients or chemicals, disposal of POME	Inspection of bund/secondary compartment for CPO, chemical storage area including SW store & machinery. Proper arrangement of EFB to estate. Land irrigation application for POME discharge Educate ERPT during event of spillages.
			Outgoing water into main natural waterways be monitored at	To monitor water quality To monitor BOD of POME

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			frequency that reflects the estates/mills current activities which may have negative impact.	<p>To maintain good condition of sewage system.</p> <p>To ensure landfill &gt;400 m from river/water source to prevent contamination.</p> <p>Maintenance of flatbed/furrow for proper flow.</p>	
			Drainage system	Free flow drains & scheduled maintenance	
			Water pollution control	To monitor the water quality for drinking water upstream/downstream water, boundary water, mill discharge water.	
	5	Others	Aim to ensure plantations activities do not cause adverse impacts to water source of local communities, employees and their families.	<p>To monitor water quality through analysis of hulu/hilir, boundary &amp; outlet.</p> <p>Monitoring of chemical consumption used for water treatment plant. rainfall,</p> <p>Monitoring of chemical consumption used for water treatment plant. rainfall</p>	

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Sighted the water analysis of sample taken at hulu/hilir (*item 5 others*) which is in conformance to advocate indication of being non-polluted. Details as shown below.

Parameters	INQW S limit	2/12/2016		5/12/2017	
		Hulu	Hilir	Hulu	Hilir
pH	5-9	4.7	3.7	4	4.5
COD	<100	177	170	169	175
BOD	<12	16	12	9	7
AN	<2.7	0	18	0	0
E coli	ND	ND	ND	ND	ND

The water consumption used in the mill is recorded and checked against the optimum level. Reasons for the irregularities usage were remarked accordingly.

Month	Water Usage/ mt FFB Processed	Remarks
Jan	1.46	
Feb	0.42	Flow meter chokages
Mac	1.41	
April	1.39	
May	0.85	
June	1.51	
July	1.44	
Aug	1.49	
Sept	1.20	
Oct	1.56	

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		Nov	1.46	High consumption due to frequent softener back wash mill cleaning	
		Dec	1.05		
		Av.	1.28		
<b>4.5.5.2</b>	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.  - <b>Major compliance</b> -	The mill discharged its effluent into the land application. The effluent are retained for treatment in a flow of 6 ponds with installation of GEO TUBE to reduce the solid before being land applied. The compliance requirement is provided in the DOE `Jadual Pematuhan` licensed to the mill. The final BOD is max 500 mg/l for the land application. The mill performs regular inspection of the effluent system to sustain efficiency of the designed capacity.			Complied
<b>4.6 Principle 6: Best Practices</b>					
<b>Criterion 4.6.1: Mill Management</b>					
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  - <b>Major compliance</b> -	The SOP for the estates and mill operations are available which is prepared on Group basis. There are levels/types of the documentation identified as follows; a) Quality, Environmental, Safety & Health & Sustainability Manual – 01/7/17 b) System Procedure – 01/1/2012 c) Procedure Manual – 02/1/2018 d) SOM Standard Operating Manual – 2013 e) Safe Operating Procedure – 01/1/2011 f) Environmental Control Procedure – 01/9/2018 g) Store Operating Manual – 2014 h) Jobs description - 2012  The mill operations are supervised by the staff, Engineers of the Mill. In addition there are visit from the SVP and mill management team. Also from the supporting units .i.e. OSH, Sustainability			Complied

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		Department. Compliance and performance are discussed monthly with reports submitted to the Head Office.	
<b>4.6.1.2</b>	All palm oil mills shall implement best practices.. <b>- Major compliance -</b>	The monitoring of the mill process is made through the shift supervision headed by An Engineer/Executives. All process parameters are documented and summarized in a daily report. The external monitoring is made through visits i.e. SVP and the mill management team. In addition there are audits by OSH, Sustainability and Financial Audits. This is to ensure compliance to Policies, procedures in relation mill operations, financial, OSH, welfare among others being adhered.	Complied
<b>Criterion 4.6.2: Economic and financial viability plan</b>			
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. <b>- Major compliance -</b>	The annual business plan is available as per the Group Financial Procedure. & Guidelines. Both estates and the mill had a similar format i.e. in the form of annual budget with a three year projection. (Budget year,PY2,PY3) This business plan is prepared as guidance for future planning. The budget contains palm year of planting, age categories, and FFB production. Component of operating expenditure includes Administration, processing cost of specific stations, workshop operations, effluent operations , general upkeep, transportation, buildings, labour overhead, EVIT (running accounts for engines, vehicles, implements & tractors . Inclusive in the business plan is also Capital Expenditure (CAPEX) among others replacement / upgrading of building, vehicles replacement, workers amenities. The budget for 2018 for both the estates was sighted and verified.	Complied

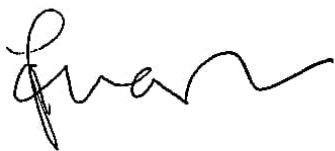

<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p><b>- Major compliance -</b></p>	<p>This is available in the guidelines LOA (limit of authority) available in the Group Financial Procedures. All tender and pricing exercises are handled by the HQ management. Projects are tendered from the approved vendors registered with HQ. Payments are processed and made by. This is made upon job verification by the both estates and HQ personnel</p>	Complied
<b>4.6.3.2</b>	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p><b>- Major compliance -</b></p>	<p>This requirement is in compliance. All contracts and purchases are documented i.e. in the form of purchase orders, invoices, and contracts for the larger transaction. All documents are signed by both vendor and estates Sample of contract sighted MS Teo Tuan Kwee Sdn Bhd dated 31.3.2016 letter of award LOA. Inclusive is clause on compliance with law 2.2 compliance to occupational safety and health act 1994 and EQA 1974. And also compliance to governing law item 7.19.</p>	Complied
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p><b>- Major compliance -</b></p>	<p>This requirement has been specified in the revised contract content under item 2.3 page 2 which reads as follows;</p> <p><i>"The contract rate or value shall include any expenses to be incurred in compliance with the requirement of RSPO, ISCC, MSPO and OSHA 1994 as set out below"</i></p> <p><i>The Contractor and his employees shall be aware of existing Company policies and procedures as follows;</i></p>	Complied

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		<p><i>OSH Policy / Sustainability Policy / Environmental Policy / People Policy / Sexual Harassment Policy / Food Safety Policy / Zero Burning Policy</i></p> <p>In addition these were emphasised and briefed during the stakeholder meeting and training sessions.</p>	
<b>4.6.4.2</b>	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p><b>- Major compliance -</b></p>	<p>This is in compliance. All estates maintain contract with the vendors as specified in the financial procedure. Requirement of the indicator has also being specified in 4.6.3.2 and 4.6.4.1 above.</p>	Complied
<b>4.6.4.3</b>	<p>The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.</p> <p><b>- Minor compliance -</b></p>	<p>This is in relation to the requirement as specified in the clause in the contract as elaborated in 4.6.4.1 above.</p>	Complied



**4.0 Assessment Conclusion and Recommendation:**

<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>	
Based on the findings during the assessment Genting Ayer Item Oil Mill and Genting Plantation (Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate) Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Genting Ayer Item Oil Mill and Genting Plantation (Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate) Certification Unit is approved.	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<b>Name:</b> Mr. Tan Cheng Huat	<b>Name:</b> Mohd Hafiz Bin Mat Hussain
<b>Company name:</b> Genting Plantations Berhad	<b>Company name:</b> BSI Services Malaysia Sdn. Bhd.
<b>Title:</b> Senior Vice President – Plantation (Malaysia)	<b>Title:</b> Lead Auditor
<b>Signature:</b> 	<b>Signature:</b> 
<b>Date:</b> 22/05/2018	<b>Date:</b> 21/05/2018

## Appendix A: Assessment Plan

Date	Time	Subjects	MH	HNS	NC	AB
Monday, 22/01/18	08:30 – 09:00	Opening Meeting at Tanah Merah Estate <ul style="list-style-type: none"> <li>• Presentation by Genting</li> <li>• Presentation by BSI Lead Auditor -introduction of team member and assessment agenda</li> <li>• Confirmation of assessment scope and finalizing audit scope</li> </ul>	√	√	√	√
Team A	09:00 – 11:00	<b>Genting Tanah Merah 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	√	√		
	10:30-11:30	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)		√		
	11:00 – 12:30	Document review (MS:2530 Part 3), P1: Management commitment and responsibility, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P7: Development of New Planting.	√			
		Document review (MS:2530 Part 3), P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition and P6 : Best practices, P7: Development of New Planting.		√		
	12:30 – 13:30	Lunch / Break	√	√		
	13:30 – 16:30	Continue with Document review and site verification if deemed necessary.	√	√		
	16:30 – 17:00	Interim closing meeting	√	√		
Team B	09:00	Travel to Genting Tebong Estate			√	√
	09:30 – 11:00	<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			√	√
	10:30-11:30	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)			√	
	11:00 – 12:30	Document review (MS:2530 Part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services.			√	
		Document review (MS:2530 Part 3), P1: Management commitment and responsibility, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices, P7: Development of New Planting.				√
	12:30 – 13:30	Lunch / Break			√	√
	13:30 – 16:30	Continue with Document review and site verification if deemed necessary.			√	√
	16:30 – 17:00	Interim closing meeting			√	√

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Date	Time	Subjects	MH	HNS	NC	AB
Tuesday 23/01/18  Team A	07:30 – 08:30	Travel to Genting Sri Gading Estate	√	√		
	09:00 – 11:00	<b>Genting Sri Gading 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	√	√		
	10:30-11:30	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)		√		
	11:00 – 12:30	Document review (MS:2530 Part 3), P1: Management commitment and responsibility, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P7: Development of New Planting.	√			
		Document review (MS:2530 Part 3), P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition and P6 : Best practices, P7: Development of New Planting.		√		
	12:30 – 13:30	Lunch / Break	√	√		
	13:30 – 15:30	Continue with Document review and site verification if deemed necessary.	√	√		
	15:30	Travel to Genting Ayer Item Oil Mill	√	√		
Team B	07:30 – 08:30	Travel to Genting Ayer Item Oil Mill			√	√
	08:30-11:00	<b>Genting Ayer Item Oil Mill</b> Field Assessment: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.			√	√
	10:30-11:30	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)			√	
	11:00 – 12:30	Document Review (MS:2530 Part 4), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services			√	
		Document Review (MS:2530 Part 4), P1: Management commitment and responsibility, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices				√
	12:30 – 13:30	Lunch / Break			√	√
	13:30 – 16:00	Continue with Document review and site verification if deemed necessary.			√	√
	Team A and Team B	16:00	Preparation for closing meeting at Genting Ayer Item Oil Mill	√	√	√
16:30 – 17:30		Closing meeting	√	√	√	√

**Appendix B: List of Stakeholders Contacted**

**Internal Stakeholders**

Workers' Committee Representatives Gender Committee Representatives Sprayers Harvesters Mill Operators
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**External Stakeholders**

<b>Government Departments</b>	<b>NGOs and others</b>	<b>Local Communities</b>
Forestry Department Officers School Representatives	Smallholders Contractors	Village Head of Kg Rahmat

**Appendix C: Smallholder Member Details**

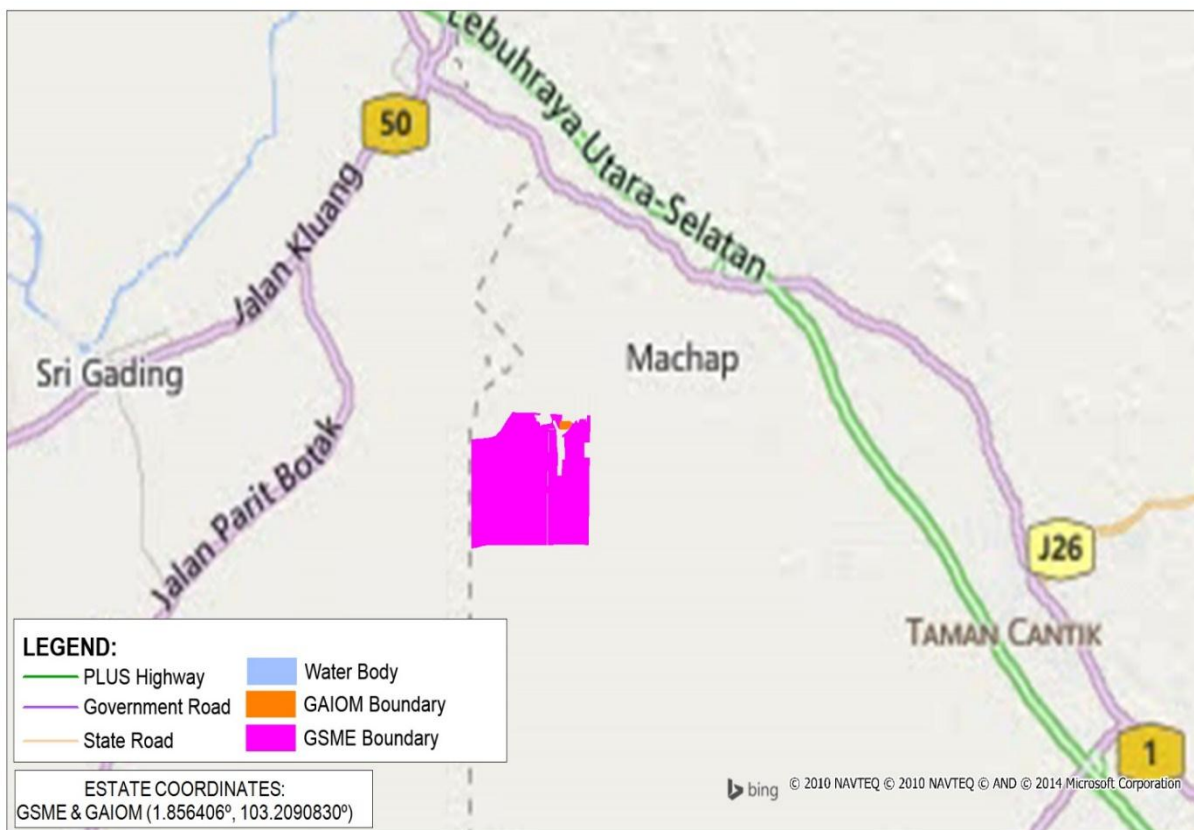
No	Name of smallholder	Year Planted	Land Area (ha)	Forecast FFB (Mt/ha/year)
1	N/A			
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
<b>TOTAL</b>				

**Appendix D : Location Map of GAIOM, GTBE, GSGE and GTME**

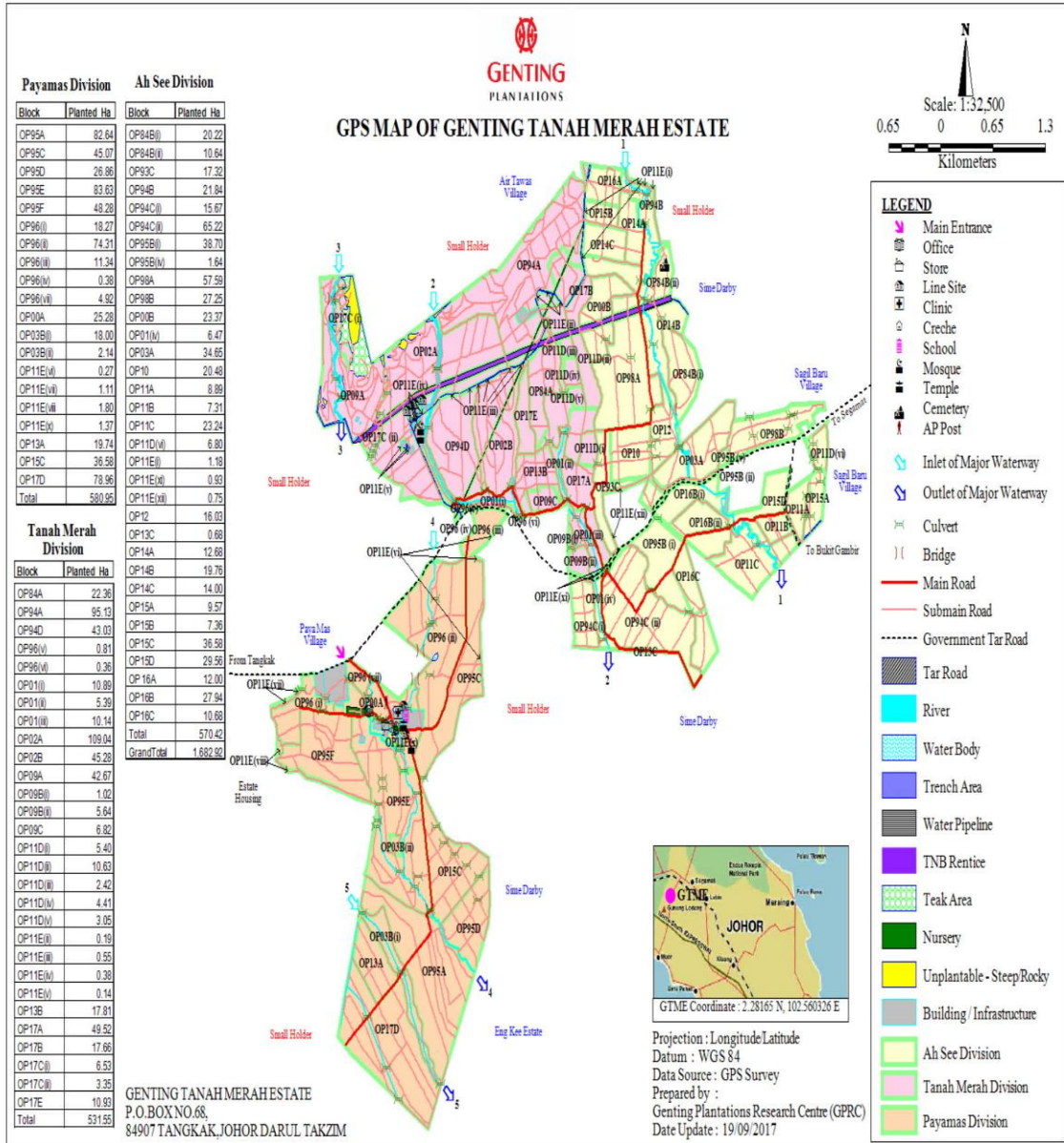


**LOCATION MAP**

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

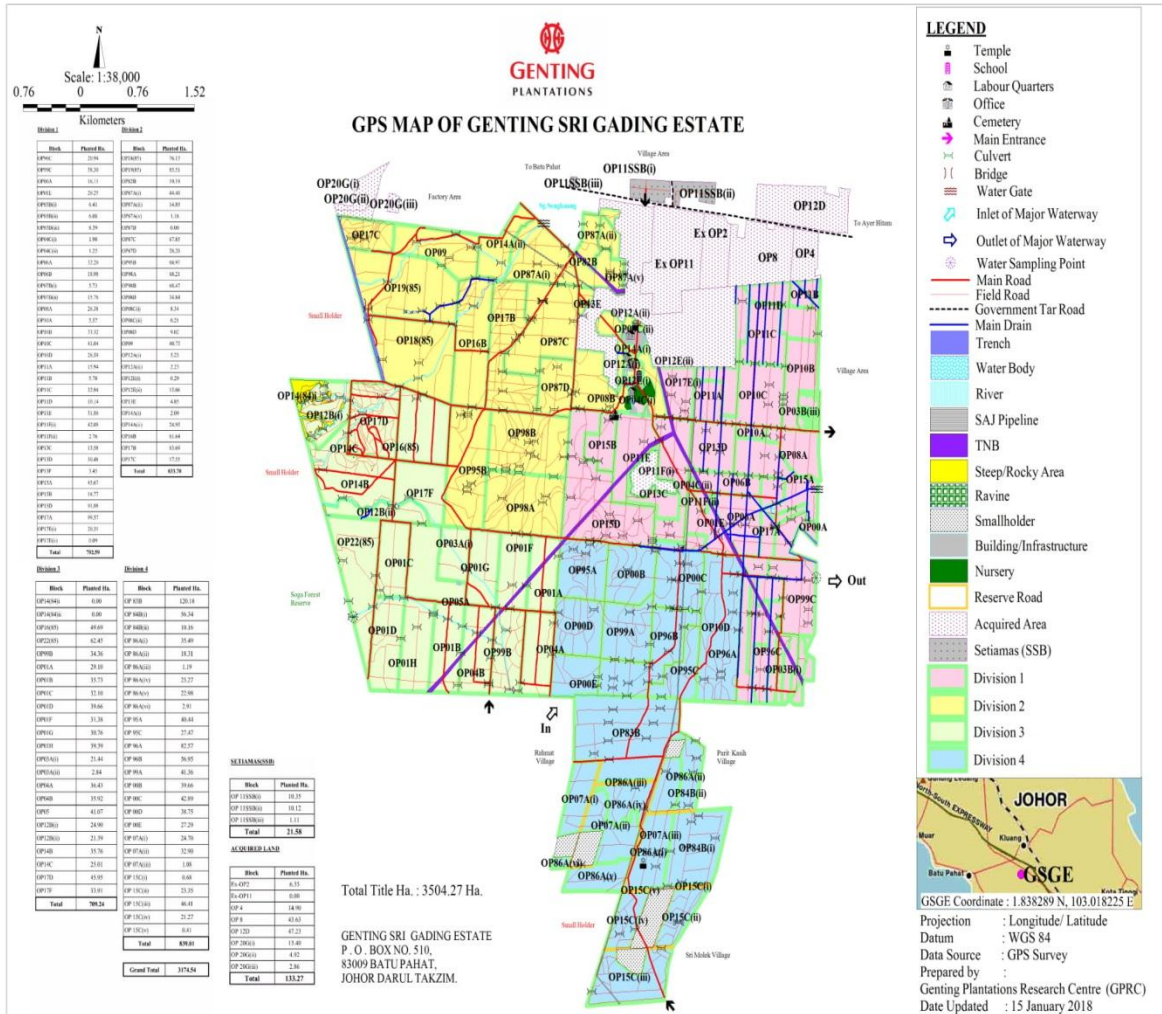


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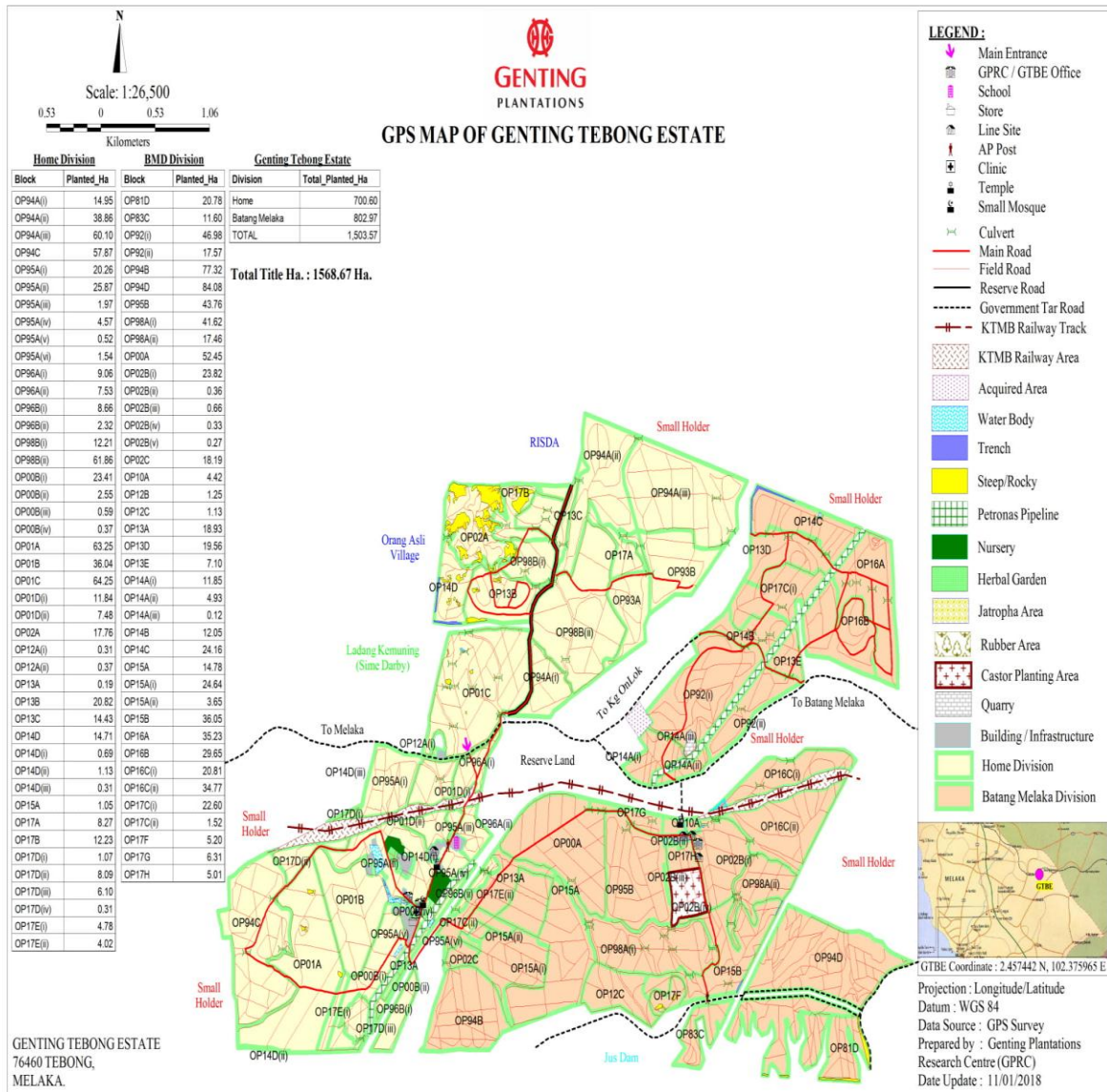


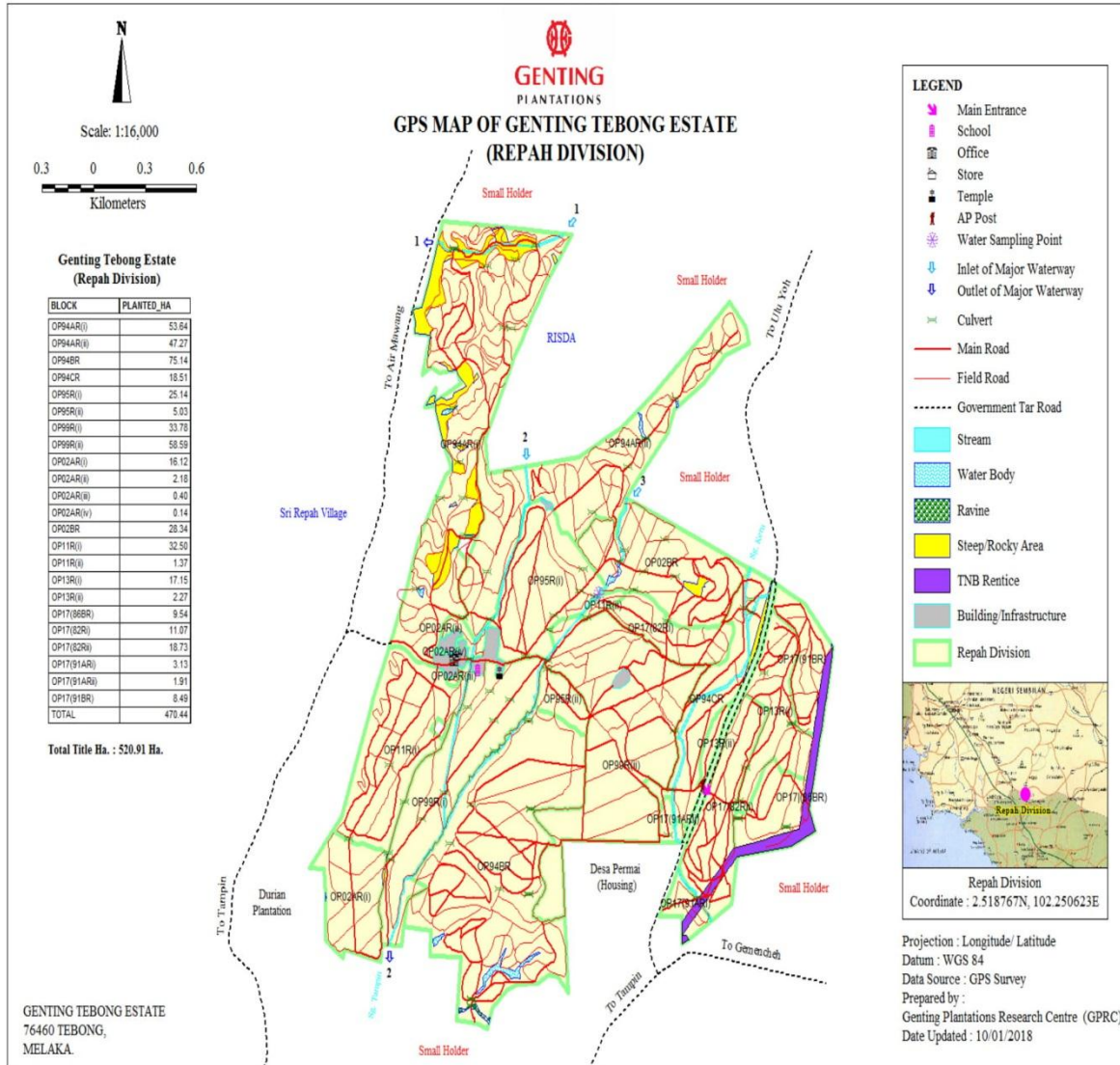
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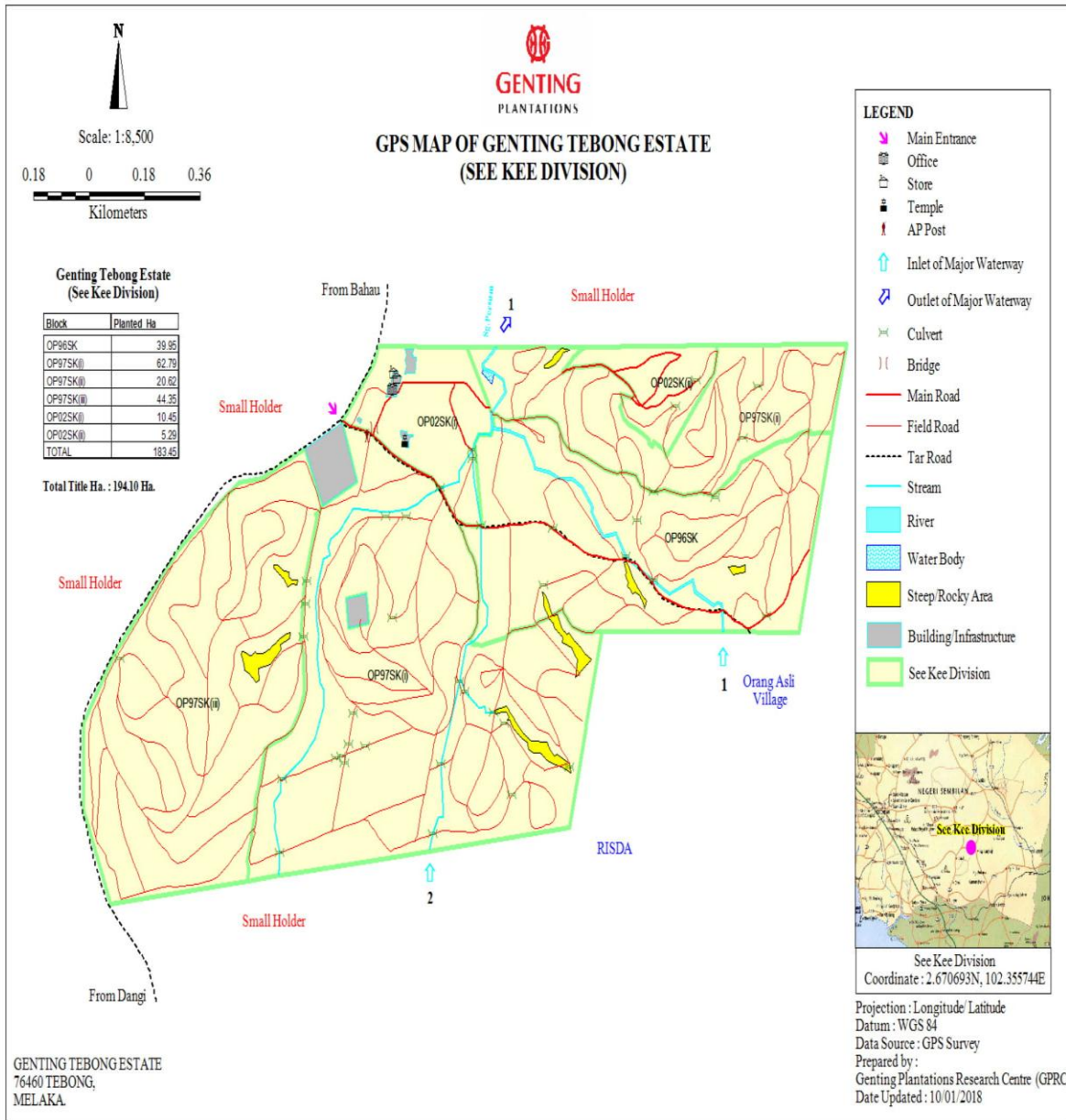


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**Appendix E: List of Abbreviations Used**

AN	Ammoniacal Nitrogen
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
GAIOM	Genting Ayer Item Oil Mill
GSGE	Genting Sri Gading Estate
GTBE	Genting Tebong Estate
GTME	Genting Tanah Merah Estate
GMP	Good Manufacturing Practice
HCV	High Conservation Value
IAV	Initial Assessment Visit
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
MSDS	Material Safety Data Sheet
MSPO	Malaysian Sustainable Palm Oil
O&G	Oil and Grease
PK	Palm Kernel
PPE	Personal Protective Equipment
RC	Re-Certification
RED	Renewable Energy Directive
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SS	Suspended Solids
TN	Total Nitrogen
TS	Total Solids
VFA	Volatile Fatty Acids