PF824 MSPO Public Summary Report Revision 0 (Aug 2017)

MALAYSIAN SUSTAINABLE PALM OIL

ANNUAL SURVEILLANCE ASSESSMENT 1 Public Summary Report

FGV Holdings Berhad

Head Office: Plantation Sustainability Department, Level 20 (W), Wisma FGV, Jalan Raja Laut, 50350 Kuala Lumpur, Malaysia

> Certification Unit: Belitong Palm Oil Mill and Supply Base

Location of Certification Unit: Kilang Kelapa Sawit Belitong, KM 28, Jalan Kluang/Kota Tinggi 86000 Kluang, Johor, Malaysia

Report prepared by: Valence Shem (Lead Auditor)

Report Number: 9673530

Assessment Conducted by:

BSI Services Malaysia Sdn Bhd, Suite 29.01 Level 29 The Gardens North Tower Mid Valley City Lingkaran Syed Putra 59200 Kuala Lumpur Tel: +603-9212 9638, Fax: +603-9212 9639 www.bsigroup.com

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Section 1: Executive Summary

1.1 Organizational Information and Contact Person						
MPOB License	Mill: 618297015000 & 61838500300	00				
	FGVPM Bukit Tongkat B: Estate 558	895002000				
	FGVASSB Ulu Belitong: Estate 5035	40902000				
Company Name	FGV Holdings Berhad					
Address	Plantation Sustainability Departmen 50350 Kuala Lumpur, Malaysia	t, Level 20 (W), Wisma FGV, Jalan Raja Laut			
Group name if applicable:	NA					
Subsidiary of (if applicable)	FGV Plantations (Malaysia) Sdn Bhd	- Kilang Kelap	a Sawit Belitong			
Contact Person Name	Mr Ameer Izyanif Bin Hamzah					
Website	www.feldaglobal.com E-mail ameer.h@fgvholdings.com					
Telephone	+603-2789 1338	Facsimile	+603-2789 0001			

1.2 Certification Information						
Certificate Number	Mill: MSPO 693232					
	Estate: MSPO 693234					
Issue Date	21/05/2019		Expiry date	20/05/2024		
Scope of Certification	on Mill: Production of Susta	inable Pal	m Oil and Palm Oil F	Products		
	Estate: Production of Su	istainable	Oil Palm Fruits			
Stage 1 Date		04-05/0	6/2018			
Stage 2 / Initial Ass	sessment Visit Date (IAV)	16-18/10/2018				
Continuous Assessr	nent Visit Date (CAV) 1	12-15/11/2019				
Continuous Assessr	nent Visit Date (CAV) 2	-				
Continuous Assessr	nent Visit Date (CAV) 3	-				
Continuous Assess	ment Visit Date (CAV) 4	-				
Other Certificat	Other Certifications					
Certificate Number	Standard(s)		Certificate Is	sued by	Expiry Date	
RSPO 693230	RSPO P&C MYNI 2014		BSI Services Malay Bhd	vsia Sdn.	06/02/2024	

1.3 Location of Certification Unit						
Name of the Certification	Site Address	GPS Reference	of the site office			
Unit		Latitude	Longitude			
Belitong Palm Oil Mill	Kilang Sawit Belitong, KM 28, Jalan Kluang/Kota Tinggi, 86007 Kluang, Johor	1° 56′ 18″ N	103° 29′ 55″ E			
FGVPM Bukit Tongkat B Estate	Ladang Fgvpm Bukit Tongkat B, 86000 Kluang, Johor	1° 56′ 29″ N	103° 30′ 14″ E			
FASSB Ulu Belitong Estate	Stesen FASSB Ulu Belitong, 86000 Kluang, Johor	1° 56′ 22″ N	103° 28′ 39″ E			

1.4 Plantings & Cycle							
Estato		Age (Years) - ha				Mature	Immature
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
FGVPM Bukit Tongkat B Estate	0	212.98	733.54	124.14	0	1,070.66	0
FASSB Ulu Belitong Estate	0	79.17	45.11	0	0	124.28	0
Total (ha)	0	292.15	778.65	124.14	0	1,194.94	0

1.5 FFB Production (Actual) and Projected (tonnage)							
Producer Group	EstimatedActual productionProjected production(May 2019-Apr 2020)(May 2019-Apr 2020)(May 2020-Apr 2021)						
FGVPM Bukit Tongkat B Estate	14,603.19	6,121.08	16,413.53				
FASSB Ulu Belitong Estate	2,991.01	1,165.92	3,602.97				
Total	17,594.20	7,287.00	20,016.50				

1.6 Certified Tonnage

	Estimated (mt) (May 2019-Apr 2020)	Actual (mt) (May 2019-Apr 2020)	Forecast (mt) (May 2020-Apr 2021)
Mill Capacity:	FFB	FFB	FFB
50 MT/hr	17,594.20	7,287.00	20,016.50
CCC Madalı	CPO (OER: 20.09%)	CPO (OER: 20.01%)	CPO (OER: 20.70%)
SCC Model: MB	3,535.29	1,566.25	4,143.42
	PK (KER: 5.66%)	PK (KER: 5.42%)	PK (KER: 5.75%)
	994.12	423.98	1,150.95

1.7 Description of Supply Base							
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Plante d		
FGVPM Bukit Tongkat Estate	1,070.66	0	171.86	1,242.52	86		
FASSB Ulu Belitong Estate	124.28	3	6.14	133.42	95		
Total (ha)	1,194.94	3	178.00	1,375.94	87		

1.8 Details of Certification Assessment Scope and Certification Recommendation:

BSI Services Malaysia Sdn Bhd has conducted the Annual Surveillance I Assessment of FGV Plantations (Malaysia) Sdn Bhd - Belitong Palm Oil Mill and Supply Base which is located in Kluang, Johor comprising Belitong Palm Oil Mill, FGVPM Bukit Tongkat B Estate, FASSB Ulu Belitong 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 12-15/11/2019.

Based on the assessment result, FGV Plantations (Malaysia) Sdn Bhd - Belitong Palm Oil Mill and Supply Base 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 to be continued.

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd, Suite 29.01 Level 29 The Gardens North Tower Mid Valley City Lingkaran Syed Putra 59200 Kuala Lumpur Tel: +603-9212 9638, Fax: +603-9212 9639 Azrul WanAzizan: <u>Azrul.WanAzizan@bsigroup.com</u> www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 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 on 12-15/11/2019. The audit programme is included as Appendix A. The approach to the audit was to treat the Belitong Palm Oil Mill and Supply Base as an 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.

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 $(\sqrt{y}) \times (z)$; where z is the risk factor (may defers from 1.0, 1.5 or 2.0 depending on risk), 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 assessment are detailed in Section 4.2.

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.

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

1. Assessment Program						
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 3)	
Belitong Palm Oil Mill	✓	\checkmark	~	~	\checkmark	
FGVPM Bukit Tongkat B Estate	~	✓	~	~	~	
FASSB Ulu Belitong Estate	✓	\checkmark	✓	~	~	

Tentative Date of Next Visit: October 12, 2020 – October 14, 2020

Total No. of Mandays: 6.0

BSI Assessment Team:

Valence Shem - Lead Auditor

He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of Legal, social aspects, employees welfare and stakeholders consultations & communications and the supply chain element. Able to communicate in Bahasa Malaysia and English.

Ismadi Ismail - Team Member

He holds Diploma in Planting Industry Management from MARA Institute of Technology, Kuantan Pahang. 24 years of working experiences with various plantation companies and skills in Best Agriculture Practices (GAP) for plantation. Fully trained in CoP, MSPO and OSHAS. Qualified as Lead Auditor/Auditor for MSPO and CoP. Involved in MSPO assessment since 2017. Completed and certified MSPO Auditor course in 2017 held by SGS (M) Sdn Bhd and ISO 9001:2015 lead auditor course by TOMC. During this assessment, he assessed on the aspects of Legal, best practices, traceability, occupational safety, biodiversity and environment. Able to communicate 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 Annual Surveillance Assessment 1, there were four (4) Major and one (1) minor non-conformities raised. The Belitong Palm Oil Mill and Supply Base submitted their Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity were 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.

Summary of Total Number of Nonconformity						
Nonconformity						
NCR Ref #	1849591-201906-M1	Clause & Category	MSPO Part 3, 4.3.1.1			
	1049591-201900-141	(Major / Minor)	Major			
Date Issued	14/11/2019	Due Date	12/2/2020			
Closed (Yes / No)	Yes	Date of nonconformity Closure	12/2/2020			
Statement of Nonconformity:	Evidence of compliance with	n relevant legal requirement	ts shall be available.			
Requirement Reference:	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.					
Objective Evidence:	In Bukit Tongkat B Estate, it was found that a worker [employee ID: FW06010020] received his pay for month January 2019 and June 2019 under minimum wage (RM1,100/month or RM42.31/day) i.e. RM668.42/25 working days or RM26.74/day and RM834.54/20 working days or RM41.28/day, respectively. Warning letters were given to the worker due to low productivity on 3, 11 and 16 January 2019. However, there is no evidence that the management has identified the root cause of his low productivity and further action taken for					
Corrections:	both months in order to comply with Minimum Wage Order 2018.The management failed to provide adequate planning and work during the low production period.					
Root Cause Analysis:	Management expand the job scope and gave extra work to the related workers in order comply with minimum wages act.					
Corrective Actions:	Provides annual training provides annual training provides personnel.	ograms for related job scop	be to the specific workers/			

Assessment Conclusion:	 Evidence submitted: January 2020 payslip of the affected worker that shows the minimum wage was fulfilled "Program Kerja" (work programme) for 2020 that shows the scope of job for workers can be expanded when necessary The corrective action evidence found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment.
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Nonconformity					
NCR Ref #	1040E01 20100C M2	Clause & Category	MSPO Part 3, 4.4.4.2		
	1849591-201906-M2	(Major / Minor)	Major		
Date Issued	14/11/2019	Due Date	12/2/2020		
Closed (Yes / No)	Yes	Date of nonconformity Closure	12/2/2020		
Statement of Nonconformity:	No evidence re-designation finding.	of work being conducted a	as per Medical Surveillance		
Requirement Reference:	The occupational safety and health plan shall cover the following: 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 Labelling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.				
Objective Evidence:	At Bukit Tongkat Estate, I dated 16th February 2019 01950478 was found unfit creatinine level. However, to the pay-slip as at July and A	e), two manuring workers, for work due to abnormal heir work assignment still re	FW 066010022 and FW chest x -ray and elevated		
Corrections:	The unfit workers have bee use of chemicals and fertiliz		s that does not involve the		
Root Cause Analysis:	Management weaknesses Surveillance.		•		
Corrective Actions:	Appoint person incharge for management to ensure the OSH Requirement & regular monitoring every 6 months by Person in charge & Regional SHO. One of PIC's task is to inform the management of any "unfit worker" when identified.				
Assessment Conclusion:	 Evidence submitted: Copies of letter from the Estate Manager to the unfit workers dated 12/11/2019 to notify them that their works have been changed to the works that do not involve chemical. The letters were acknowledged by the workers through signatures. The corrective action evidence found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment. 				

Nonconformity			
NCR Ref #	1849591-201906-M3	Clause & Category	MSPO Part 3, 4.5.3.2
NCK KEI #		(Major / Minor)	Major
Date Issued	14/11/2019	Due Date	12/2/2020
Closed	Yes	Date of nonconformity	12/2/2020

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(Yes / No)	Closure					
Statement of Nonconformity:	Scheduled waste has exceeded the 180 days validity period.					
Requirement Reference:	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					
		ngkat B Estate alr nental Quality Act			eriod as stipula	ated in the
	"Environmental Quality (Scheduled Wastes) Regulations 2005; PU(A) 294/2005; Regulation 9-Storage of Scheduled Wastes; No.5 – Any person may store schedule wastes generated by him for 180 days or less after its generation provided that:					
Objective Evidence:	 The quantity of scheduled wastes accumulated on site shall not exceed 20 metric tons; and" As evidence; 					
			Date	Date	Difference	
		SW 409	Generated 28/2/2019, 0.001 Mt	Disposed	Days 258	-
Corrections:	Due to low volume of schedule waste generated, estate decided to dispose waste at the KS Belitong.			ose waste		
Root Cause Analysis:	Management weaknesses in monitoring and managing wastes of scheduled waste materials either from the project or contractors.			scheduled		
Corrective Actions:	Management to ensure all schedule waste item and Used PPE produced handled according to the waste management plan by regular monitoring every 6 months by regional SHO and thru periodic OSHA meeting.					
Assessment Conclusion:	 Evidence submitted: A copy of inventory records (5th Schedule) that shows the scheduled wastes kept are not exceeding 180 days and sent to the centralised collection centres as decided by the top management in FGV The corrective action evidence found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment. 					

Nonconformity	Nonconformity			
NCR Ref #	1040501 201006 M4	Clause & Category	MSPO Part 4, 4.3.1.1	
	1849591-201906-M4	(Major / Minor)	Major	
Date Issued	14/11/2019	Due Date	12/2/2020	
Closed (Yes / No)	Yes	Date of nonconformity Closure	12/2/2020	
Statement of Nonconformity:	Evidence of legal compliance was not adequately demonstrated.			
Requirement Reference:	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.			
Objective Evidence:	 Audiometry Test was conducted on 16th October 2018 to 35 employees. Two workers namely, En Asmadi bin Amat (71XXXX-XX-5081) and En. Parizan bin Abd Kadir (77XXXX-XX-6807) was under Standard Threshold Shift. No 			

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	evidence, re-test being conducted within three months from the date of the last audiometric test [ref.: Factories And Machinery Act 1967 [Act 139] P.U. (A) 1/1989 Factories And Machinery (Noise Exposure) Regulations 1989, Regulation 23]	
	2) In Belitong POM, there was a female worker (Worker ID: 1210638) has worked overtime on 30/06/2019 from 2215 to 0045 (2.5 hours) which is after 10 p.m. However Belitong POM didn't have the permit from the Labour Department for female working after 10 p.m.	
	 3) The workers housing weekly inspection was not conducted on weekly basis. Based on the inspection report, the dates of the inspection are as follows: Last: 11/11/2019 	
	- 2nd last: 24/9/2019	
	- 3rd last: mid-Aug 2019	
Corrections:	 Mill to apply the permit mentioned. Mill to conduct retest for 2019 audiometric test to the specific workers Asmadi and Parizan. Mill to appoint several workers that in charge to do housing inspection every week 	
Root Cause Analysis:	Management weaknesses regarding to the Legal Requirement.	
Corrective Actions:	 Appoint person incharge for management to ensure the Legal & OSH Requirement. Do regular monitoring every 6 month by Person in charge. Letter of appointment to workers as Person in Charge for housing inspection. 	
Assessment Conclusion:	 Evidence submitted: A copy of OHD report on audiograme test dated 12/10/2019 for 70 mill employees which includes the two concerned employees. The results showed no hearing impairment detected. A letter dated 26/12/2019 from the mill manager to the female employees to notify them that working after 10.00 p.m. is no longer allowed. A letter dated 30/12/2019 from the mill manager to two employees to notify them to conduct the weekly housing inspection which includes the inspection program. The corrective action evidence found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment. 	

Nonconformity			
NCR Ref #	1849591-201906-N1	Clause & Category	MSPO Part 3, 4.5.3.5
NCK KEI #		(Major / Minor)	Minor
Date Issued	14/11/2019	Due Date	Next surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	Open
Statement of Nonconformity:	Domestic wastes was not effectively managed.		
Requirement Reference:	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.		

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Objective Evidence:	During site visit at Bukit Tongkat B workers housing, it was found out that domestic wastes were disposed behind Block Seri Alamanda & Dahlia. The drain behind the toilet of Dahlia was also full of wastes.		
Corrections:	To conduct domestic waste cleaning programme/ communal work at residential areas that has been identified.		
Root Cause Analysis:	Weekly inspection for line site inspection by management not all covered. No monitoring on domestic waste management and no awareness on domestic waste for workers		
Corrective Actions:	 Provide a complete checklist that covered surroundings and in the residential building Management to conduct awareness on domestic waste management to workers every year 		
Assessment Conclusion:	The correction and corrective action plan are accepted. Verification of evidence of effective implementation shall be carried out in the next surveillance assessment.		

	Noteworthy Positive Comments
1.	Positive comments from all stakeholders interviewed
2.	All personnel were cooperative during the assessment process

3.3 Status of Nonconformities Previously Identified and OFI

Nonconformity	Nonconformity				
NCR Ref #	160607E 201904 NI	Clause & Category	MSPO Part 3, 4.4.4.2		
	1696075-201804-N1	(Major / Minor)	Minor		
Date Issued	18/10/2018	Due Date	14/11/2019		
Closed (Yes / No)	Yes Date of nonconformity Closure		14/11/2019		
Statement of Nonconformity:	The appointed employees to be the first-aiders were not trained.				
Requirement Reference:	The occupational safety and health plan shall cover the following: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				
Objective Evidence:	There were 2 employees at FASSB Ulu Belitong Estate appointed as first-aiders. However, there is no evidence that they have been trained on first aid.				
Corrections:	 FASSB estate management Ulu Belitong submits a letter of notification to the central management for review of the first aider training needs to the involved personnel who need to be implemented immediately. Feedback of confirmation the first aider training date to be performed by the central FASSB management. 				
Root Cause Analysis:	1. Implementation of first aider training needs to staff for each FASSB farm is coordinated at a centralized level where estate management has listed the name of the officer (En Abd Jalil & En Hafiz) to undergo the training in 2018 programme.				

	 The FASSB central management coordinating program has not yet informed the plantation for the validation of the training date to be implemented in 2018 although the meeting on the requirements was discussed at the central management level. The officer who was previously trained as a first aider was En Mohd Lazim Judin who had been transferred to another unit and no substitute trainees were trained during that period.
Corrective Actions:	 Copy of letter to FASSB center management related to first aid training needs. Feedback (letter / email) regarding the confirmation of the first aider training date to be implemented. Letter of call attending the first aider course. Copy of first aider certificates for staff who have undergone training
Assessment Conclusion:	 Verified corrections and corrective actions: Evidence, Certificate of Attendance of En. Muhammad Afif bin Ayob the 1st Aider for Ulu Belitong Estate dated 21st and 22nd February 2019. The evidences submitted found adequate and effectively implemented. Thus, the Minor NC was effectively closed.

3.4 Issues Raised by Stakeholders

IS #	Description			
1	Issues:			
	FELDA Bukit Tongkat Villagers/Surrounding Communities			
	There are elephants at the PM00H sighted by the settlers. The block has been left abandoned due to			
	steep terrain and lead to the elephant encroachment at the settler's oil palm block. The installation of			
	Empangan Sembrong also become the reason why the elephants entered to the nearest villagers			
	(Kampung Sri Timur). There is no land conflict/dispute occurred.			
	Management Responses:			
	Information noted.			
	Audit Team Findings:			
	No further issue.			
2	Issues:			
	Contractors & Suppliers			
	The payment and sales contracts are available and they were happy on the timeliness payment been			
	made by FGV.			
	Management Responses:			
	Information noted.			
	Audit Team Findings:			
_	No further issue.			
3	Issues:			
	Sekolah Kebangsaan LKTP			
	This is the first time school representative has come to Bukit Tongkat B office because they are nearer			
	to FASSB Ulu Belitong Estate. So far they receive good cooperation and relationship with FGV			
	management. The CSR programme mainly come from FELDA.			
	Management Responses:			

	Information noted.
	Audit Team Findings:
	No further issue.
4	Issues:
	Foreign Workers & Locals Representatives
	There were wild boars roaming at the centralized waste bin in the housing area. No issue on salary and overtime paid.
	Management Responses:
	Information noted.
	Audit Team Findings:
	No further issue.
5	Issues:
	Gender Committee
	No sexual harassment cases reported so far. Activities were conducted regularly and recorded in the
	meeting minutes.
	Management Responses:
	Information noted.
	Audit Team Findings:
	No further issue.

3.5 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1696075-201804-N1	Minor	18/10/2018	Closed on 14/11/2019
1849591-201906-M1	Major	14/11/2019	Closed on 12/2/2020
1849591-201906-M2	Major	14/11/2019	Closed on 12/2/2020
1849591-201906-M3	Major	14/11/2019	Closed on 12/2/2020
1849591-201906-M4	Major	14/11/2019	Closed on 12/2/2020
1849591-201906-N1	Minor	14/11/2019	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

Criterio	n / Indicator	Assessment Findings	Compliance	
4.1 Principle 1: Management commitment & responsibility				
Criterion	4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	FGVhaveestablishedtheGroupSustainabilityPolicy[FGV/SED/POL/001, rev. 3, dated 29thMay 2019 signed by Chairman,BoardofDirectorsYBHGDatukWiraAzharAbdulHamid.Thepurpose of the policy is to established the objectives and guidelinesforFGV and itsGroup ofCompanies with regards to sustainabilitymatters.The policy covering the following aspects: -1.Social Responsibility2.Profitability and Use of Resources3.Environmental Stewardship4.Value Chain5.Transparency and Reporting	Complied	
4.1.1.2	The policy shall also emphasize commitment to continua improvement. - Major compliance -	Sighted under Group Sustainability Policy stated EGV Group is	Complied	



Criterio	on / Indicator	Assessment Findings	Compliance
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Internal audit was conducted on 17 th -18 th September 2019 at Bukit Tongkat B Estate and 19 th – 20 th September 2019 at Ulu Belitong Estate by two internal auditors, Muhammad Zulfadzli Sufian Suri and Abd Rahman Awang.	Complied
4.1.2.2	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. - Major compliance -	FGV have established an Internal Audit Procedure, Doc No: FGV/ML- 1A/L2-Pr11, issue 1, version 0 dated 01.06.2016 as a reference for audit process. The audit findings were documented under Internal Audit Summary and total findings at Bukit Tongkat B Estate was 56% @ 29 criteria Non-conformities and Ulu Belitong Estate at 45% @ 27 criteria Non- conformities.	Complied
		The response and action taken by Estate Manager for all the findings raised by the Internal Audit was on 30 th September 2019 (Bukit Tongkat B Estate) and 30 th October 2019 (Ulu Belitong Estate) within the deadline. All details are well documented by Estate Management.	
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	The internal audit report was documented and made available for management review. As evidence, all findings from internal audit was responded by both estates' management within the timeframe stipulated in the Audit Procedure.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
Criterio	n 4.1.3 — Management Review		
4.1.3.1	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.	Management review was conducted on 2 nd October 2019 at Bukit Tongkat B Estate and 10 th October 2019 at Ulu Belitong Estate. The meeting being chaired by the respective Estate Manager.	Complied
	- Major compliance -	Other than internal audit matter, 7 more agendas were discussed and as follows:	
		 Customer satisfactory Production Environment Social Replanting Management Review Continuous Improvement 	
Criterio	n 4.1.4 – Continual Improvement		
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -	FGV have established procedure on Continuous Improvement Doc No: FGV/ML-1A/L2-Pr7, issue 1, version 0 dated 01.06.2016 with an objective to provide action plan in implementing the Continuous Improvement Plan covering Social, Best Practices and Environmental.	Complied
		The Continuous Improvement Plan for Bukit Tongkat B Estate are as follows: -	
		1. Reduce usage of Pesticides by increase barn -owl boxes and	

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Criterion / Indicator		Assessment Findings	Compliance
		planting of Beneficial Plants, <i>Turnera subulata, Cassia</i> Cobanensis and Antigonen leptosus	
		Reduce erosion by planting of cover crops and frond stacking.	
		3. Control of landfill area	
		4. Disposal of Empty chemical containers.	
		5. EFB application in the field	
		6. Reuse of empty chemical containers for spraying activities	
		7. House beautification campaign	
		As for Ulu Belitong Estate the Continuous Improvement Plan as below: -	
		1. EFB application in the field	
		2. To control on rat attack	
		3. To improve on infrastructure - Sundry shop, Night Market, Internet Centre, Guard Post	
		4. To use recycle paper for printing at office.	
4.1.4.2	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.	Any new technology and/or innovation equipment is subject to approval by HQ No new technology adopted by the estate for field operation so far.	Complied
	- Major compliance -		



Criterio	on / Indicator	Assessment Findings	Compliance
4.1.4.3	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.	Training will be provided to respective personnel that involved with any new technology and/or innovation equipment.	Complied
	- Major compliance -		
4.2 Prin	ciple 2: Transparency		
Criterion	4.2.1 – Transparency of information and documents relevant	to MSPO requirements	
4.2.1.1	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.	Bukit Tongkat B Estate and Ulu Belitong Estate has issued a memo to the stakeholders such as settlers, contractors, suppliers and government authorities regarding the request of documents such as land title, OSH plan, social and environment assessment plan, complaint and grievance procedure, company policies and HCV management plan.	Complied
	- Major compliance -	FGV has conducted a combined stakeholder meeting on 24/5/2018 for PSD, Felda Segamat Region, FTPSB Segamat Region, FGVPM Segamat Region and FPISB Kluang Region. During the meeting, the management has explained the requirements of sustainable palm oil certification to all the stakeholders. Besides, briefing of policies and management procedures of sustainability was carried out during the meeting as well.	
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative	There is no restriction for the public to access the type of documents listed in the RSPO P&C standard at FGV. The means of communication have been spelt out in their " <i>Komunikasi, Penglibatan</i>	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
	environmental or social outcomes. - Major compliance -	dan Rundingan" procedure [doc. no.: ML-1A/L2-Pr12(0) dated /6/2016]. The application of the procedure has also been briefed to he stakeholders during stakeholders meeting. Among the means of communication were through morning muster between the nanagement and the employees, notice boards, suggestion box, vorkers' representative, etc. Communication process with external takeholders, medias and contractors was also spelt out in the procedure. List of documents which are publicly available was stated in the procedure according to the RSPO P&C standard requirement. Documents such as meeting minutes, OSH plan, HCV report, policies, SEIA, etc. were publicly available upon request. Apart from that, the Group Sustainability Policy can be accessed via the internet link, http://www.feldaglobal.com/sustainability/sustainability- governance/sustainability-policies/	
Criterior	4.2.2 – Transparent method of communication and consult	ation	
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	FGV has developed " <i>Komunikasi, Penglibatan dan Rundingan</i> " procedure [doc. no.: ML-1A/L2-Pr12(0) dated 1/6/2016] where the objective of the procedure is to provide an effective communication system with the stakeholders. The types of communication are such as with the internal workers, media, external stakeholders, contractors and suppliers. The time frame to be responded to external communication is within 2 weeks from the date of receipt of request and within 1 week from the date of investigation completed if it is requiring any investigation.	Complied
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.	Supervisor of Bukit Tongkat B Estate and Ulu Belitong Estate has been appointed as Communication Officer for social issue in the estate. Appointment letters were available for verification [Ref.: Bukit	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
	- Minor compliance -	Tongkat B Estate: Mr. Khairuddin Bin Abd Halim, Kerani HEP dated 19/3/2019 (Bil: 3601/12-1-3 Pt.2) and Ulu Belitong Estate: Mohd Fauzi Isahak, Penyelia Ladang dated 12/3/2019 ((11)820630001-2019/01/01))].	
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	Bukit Tongkat B and Ulu Belitong Estate management has developed stakeholder list which includes government authorities, local communities, settlers, neighbouring plantations, contractors and suppliers. The lists were last updated on 10/10/2018 (BTB) and 1/1/2019 (UB)	Complied
1		A combined stakeholder meeting for Segamat and Kluang region was conducted on 24/5/2018 with participation of relevant stakeholders such as local authorities, local communities, neighbouring plantations and contractors. Input of the stakeholders was incorporated into the meeting minutes by conducted the questionnaire with the stakeholders.	
Criterio	n 4.2.3 – Traceability	· · · · · · · · · · · · · · · · · · ·	
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).	FGV have established Standard Operating Procedures on traceability trough Manual Ladang Sawit Lestari, 8.0 Mengangkut BTS ke Kilang [MLSL (Ed.3) – Sec.4 (8.0), 1 st September 2017.	Complied
	- Major compliance -	The objective is to provide guideline on delivery of FFB to the mill within 24 hours. Among the documents & records to be adhere were:	
		 Nota Penghantaran BTS Slip Akuan Penerimaan (weighbridge ticket) Slip Grading Sijil Mutu BTS 	

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Criterio	on / Indicator	Assessment Findings	Compliance
4.2.3.2	The management shall conduct regular inspections on	5. Label di lori mengangkut BTS ke kilang. The Management team on harvesting holds the responsibility on	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	regular inspection of traceability system. Periodical inspections also being conducted through Regional Controller, Internal Audit and Agronomist visit.	Complied
		The effectiveness of the monitoring will evidence in the internal audit and visit report findings.	
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system.	En Ahmad Bustamam bin Mohd Nor as the person incharge of traceability at Bukit Tongkart B Estate vide letter dated 19 th March 2019 approved by Mr Hadi Helmi bin Che Hassan, Estate Manager.	Complied
	- Minor compliance -	As for Ulu Belitong Estate, En Abdul Jalil Kassim as the person incharge of traceability vide letter dated 4 th February 2019 approved by Mr Din Ibrahim, Estate Manager	
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained.	FFB being sell to Ulu Belitong POM and being monitored by Head Quarters @ Wilayah Office. Sighted records of sales, delivery, or transportation of FFB being maintained at the Estate.	Complied
	- Major compliance -		
4.3 Prin	ciple 3: Compliance to legal requirements		
Criterio	n 4.3.1 — Regulatory requirements		
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.	The estates are committed to comply with all the applicable legal requirements. Among the evidence of compliance sighted were: - FGV Plantations (Malaysia) Sdn Bhd and Felda Holding Sdn Bhd	Non-conformity
	- Major compliance -	has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia for deduction of wages for water, electricity, medical	

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Criterio	n / Indicator	Assessment Findings	Compliance
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	fees that exceeded limit and other advance. Seen the approval permit with Ref. No.: (22)dlm BHG. PU/9/129 Jld 23 dated 26/4/2016 and Serial No.: PP3/34/0351 dated 15/9/2000 Nonetheless, in Bukit Tongkat B Estate, it was found that a worker [employee ID: FW06010020] received his pay for month January 2019 and June 2019 under minimum wage (RM1,100/month or RM42.31/day) i.e. RM668.42/25 working days or RM26.74/day and RM834.54/20 working days or RM41.28/day, respectively. Warning letters were given to the worker due to low productivity on 3, 11 and 16 January 2019. However, there is no evidence that the management has identified the root cause of his low productivity and further action taken for both months in order to comply with Minimum Wage Order 2018. Thus, a non-conformity report was assigned due to this lapse. The applicable laws identified were listed in Daftar Perundangan dan Lain-lain Keperluan (Register of Legal and Other Requirements, [ML- 1A/L5-AP1 Pind 0] The sample of Act and Legal at Bukit Tongkat B Estate last updated on 26/4/2019 as listed herein: 1. OSHA 1994 2. FMA 1967 3. Pesticide Act 1974 4. Electrical Supply (Amendment) Act 2015 5. Fire Services Act	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		6. Environmental Quality Act	
		7. Local Government Act	
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.	The mechanism of tracking changes and update are guided by procedure on Pematuhan Undang – Undang dan Keperluan Lain, Doc No: FGV/ML-1A/L2-Pr6, issue 1, version 0 dated 01.06.2016.	Complied
	- Major compliance -		
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.	FGV have centralised system for tracking any changes in the law as per "Panduan: Sistem Pengesanan Perubahan Undang-undang" dated 23/6.2017, Version:04. Any changes in the relevant regulations is through Plantation and Sustainability Department and the	Complied
	- Minor compliance -	Manager, who are sole responsible. En Mohd Fauzi bin Isahak of Ulu Belitong Estate as the person incharge of traceability vide letter dated 25 th July 2019 approved by Mr Din Ibrahim, Estate Manager	
Criterio	n 4.3.2 – Lands use rights		
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	Bukit Tongkat B Estate holds total 12 land titles (under FELDA) which they leased from FELDA for approximately 848.88 Ha for 99 years. For Ulu Belitong estate, the total hectarage is 138.49 ha. The rental agreement was signed between Federal Land Development Authority and Felda Agricultural Services Sdn Bhd dated 7 Feb 2017 which expired on 31/12/2017. As per letter (18)820101013/khidmat korporat/External dated 14/6/2019, new rental agreement has been established for Ulu Belitong estate with new total hectarage 157.12 Ha.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance		
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	Bukit Tongkat B Estate holds total 12 land titles (under FELDA) which they leased from FELDA for approximately 848.88 Ha for 99 years. For Ulu Belitong estate, the total hectarage is 138.49 ha. The rental agreement was signed between Federal Land Development Authority and Felda Agricultural Services Sdn Bhd dated 7 Feb 2017 which expired on 31/12/2017. As per letter (18)820101013/khidmat korporat/External dated 14/6/2019, new rental agreement has been established for Ulu Belitong estate with new total hectarage 157.12 Ha.	Complied		
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Bukit Tongkat B Estate, legal perimeter boundary was clearly demarcated with trenches, electrical fencing and pegs painted with red & white colour along the boundary and at Ulu Belitong Estate, the perimeter boundary is demarcated with the fencing. During site verification, the legal boundary of both Estates was visibly maintained.	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 Bukit Tongkat B Estate and Ulu Belitung Estate at the time of audit. The lands are leased by Felda from Johor government to FGVPM and FASSB. This can be evident through verification of the agreement dated 15/11/1978 and approval letter from Felda to FASSB dated 18/1/2018. Surrounding the estate are oil palm plantation owned by settlers. There was no encroachment of land by the Bukit Tongkat B Estate and Ulu Belitung Estate.	Complied		
Criterio	Criterion 4.3.3 – Customary rights				
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood		Complied		



Criterion / Indicator		Assessment Findings	Compliance
	and are not being threatened or reduced. - Major compliance -	existing land is not encumbered by any customary land rights.	
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	The lands are legally leased by state government and leased by FELDA to FGVPM and Felda Agricultural Services Sdn Bhd. The existing land is not encumbered by any customary land rights.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	Complied
4.4 Prin	ciple 4: Social responsibility, health, safety and emplo	oyment condition	
Criterio	n 4.4.1: Social Impact Assessment (SIA)		
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	The SIA with was carried out on 23/1/2018 and 24/1/2018 for the Mill and Bkt Tongkat B Estate and Ulu Belitong Estate, respectively. Records of consultation such as attendance lists and inputs received from stakeholders are being documented. Those who attended include workers (foreign and local), contractors, etc. Records of meetings are documented in the SIA report itself.	Complied
Criterio	n 4.4.2: Complaints and grievances		
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented.	FGV has developed procedure of "Menangani Aduan dan Rungutan" (Doc. No.: FGV/ML-1A/L2-Pr13, issue 1, rev. 0, dated 1/6/2016). The	Complied
	- Major compliance -	objectives of the procedure are to provide a channel for the internal stakeholders and external stakeholders to lodge any complains to the management. Mechanism to handle the complains was clearly	

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Criterion / Indicator		Assessment Findings	Compliance
		described in the procedure. The scope of the procedure covered the complaints related to management, housing complex, settlers and other welfare issues. There are 5 stages of process for internal complaint. The time frame for investigation of the issue should be done within 14 working days.	
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. - Major compliance -	Bukit Tongkat B Estate and Ulu Belitong Estate has implemented Complaint and Response Form/ Book to record complaints or requests from the stakeholders. All the issues recorded were about defects of housing facilities. Based on the records of complaints lodged, the actions taken by the management were appropriate and timely manner.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	The complaint record book was available in the office area where the stakeholders can easily access to lodge their complaint.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	Interview with internal and external stakeholder during stakeholder consultation found that they were aware of the complaint procedure and were briefed by the management during stakeholder meeting.	Complied
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.	The managements have implemented the complaint form since March 2017. The records of complaint were well maintained ever since.	Complied
	- Major compliance -		



Criterion / Indicator		Assessment Findings	Compliance
Criterio	n 4.4.3: Commitment to contribute to local sustainable deve	lopment	
4.4.3.1	Growers should contribute to local development in consultation with the local communities Minor compliance -	 Among the contributions given by the estates are: Repair and cleaning of Pondok Polis Ulu Belitong [letter ref.: (59)3310/1-4-6-pt2, dated 18/12/2018] Permission to provide grazing area in BTB field for cattle farming for a settler [ref.: letter dated 28/2/2019] 	Complied
Criterio	n 4.4.4: Employees safety and health		
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	FGV Holdings Berhad has established Safety and Health Policy signed by the Group CEO, Dato' Haris Fadzilah Hassan on 8 th May 2019. All Policies are displayed prominently on notice boards being communicated to the employees through trainings and briefings.	Complied
4.4.4.2	 The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices 	 FGV Holdings Berhad has established Safety and Health Policy signed by the Group CEO, Dato' Haris Fadzilah Hassan on 8th May 2019. All Policies are displayed prominently on notice boards being communicated to the employees through trainings and briefings. Risk assessment was conducted through HIRARC based on the severity and the likelihood. HIRARC is consist of hazard identification (type of work activity, hazard & effect), Risk analysis (Existing risk control, likelihood, severity & risk) & Risk Control (Recommended control measures & PIC appointed are Staff or Executive). HIRARC sighted for the followings work operation at both Estates: - Menuai & Mengumpul BTS Mencantas Pelepah 	Non-conformance

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Criterion / Indicator	Assessment Findings	Compliance
 observed and applied 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). 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. f) The management shall appoint responsible person(s) of trust 	 Merumput Mengumpan Tikus Pergerakan Dalam Ladang Penggunaan computer & kebersihan pejabat Mengawal Serangan Gajah Penggunaan motosikal Menyelengara Jalan Pertanian Tractor , Mini tractor Pembajaan Kawalan Musuh dan Penyakit Etc Evidence, HIRARC being reviewed on 7 th November 2019 at Bukit Tongkat B Estate. The Estate has a comprehensive annual training plan for the Staffs and Workers and this was sighted in the training records file for each staffs and workers. Sample training plan and conducted as follows: -	
 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. h) Accident and emergency procedures shall exist and 	NOTOPICMONTH PROGRAMMESTATUSBukit Tongkat B Estate1Penerangan Manual Keselamatan29/8/20197/10/20192KeselamatanMenunggang Motosikal13/11/201924/6/2019	
instructions shall be clearly understood by all employees.	3 Amalan Keselamatan 18/2/2019	

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Criterion / Indicator		Assessmer	nt Findings		Compliance
Criterion / Indicator 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. j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. - Major compliance -	4 5 6 7 Ulu 1 2 3 4 5 6 7	Assessmertempat kerjaFirst AidLatihan PenuaianLatihan MembajaLatihan MCVBelitong EstateKeselamatan Menunggang MotosikalAktiviti MenuaiAktiviti MenuaiAktiviti MenuaiAktiviti MeracunLarangan TerbukaPenerangan First AidMemadam Kebakaran & Evakuasi	At Findings 26/8/2019 22/8/2019 15/10/2019 15/10/2019 12/7/2019 September May July June February July	5/7/2019 7/10/2019 26/9/2019 30/4/2019 30/10/2019 30/10/2019 28/2/2019 28/2/2019 26/9/2019 14/5/2019 16/7/2019 12/6/2019 22/2/2019 12/7/2019	Compliance
	dan Pe by 6 p record Estate	Penerangan GSP es training conducted at Ulu enyelengaraan Kenderaan da participants. Trainings record s, training materials and pho has provided appropriate ions. PPE Issuance and repla	ted 24 th Septeml d was completed tographs. e PPE for all	ber 2019 attended d with attendance workers in their	

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Criterion / Indicator	Assessment Findings	Compliance
	a. Staff/AP	
	b. Harvesters	
	c. Field Workers	
	d. General Workers	
	During field visit, sighted the workers have been trained with safety and the workers wear the PPE required by his/her works.	
	All workers involved in the operations have been adequately trained in safe working practice.	
	Sighted, Standard Operating Procedure for handling of used chemicals being established by Plantation Sustainability & Quality Management Department, Felda Global Ventures Plantations (M) Sdn Bhd under Document Number FGVPM/L3/PK-04 – Prosedur Kerja Selamat, Pengendalian Bahan Kimia dated 1st April 2014.	
	At Bukit Tongkat B Estate, CHRA report dated 4th October 2015 reported by Mr. Ihsan Sharif, JKKP HIE 127/171-2(85) by Ihsan Sharif Resources.	
	A total of 13 workers have undergone medical surveillance on 15 th December 2108 covering sprayers (3), Manurer (8), Field Supervisor (1) and driver (1). They were tested on Physical examination, Blood, Urine, Cholinesterase and Chest X-ray.	
	Based on medical surveillance (HQ/11/DOC/00/235) dated 16th February 2019 at BTB Estate, two manuring workers, FW 066010022 and FW 01950478 was found unfit for work due to abnormal chest x	

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Criterion / Indicator	Assessment Findings	Compliance
	-ray and elevated creatinine level.	
	However, their work assignment still remain status quo based on the pay-slip as at July and August 2019. Thus a non-conformity report was assigned sue to this lapse.	
	Person incharge of OSH is the respective Estate Manager appointed, Pengurus Besar Wilayah Mersing. Both Estates has conducted OSH Meeting on quarterly basis.	
	No accidents being recorded in 2018. Sighted the emergency procedure for the Estate. Emergency response plan available in local language (Malay and English). The ERP has been explained to all workers and staffs during training which has been conducted.	
	Emergency response plan include the emergency contact number, and also have Guidelines on Accident, Emergency Procedures and Exit routes as well as assembly point in file and pasted on notice board.	
	The first aider for the Bukit Tongkat B Estate is Mr. Muhammad Faiq bin Abdullah (IC No : 84XXXX-XX-6333) and Mr. Khairuddin bin Abd Halim (IC No : 83XXXX-XX-5397). In Ulu Belitong Estate, En Muhammad Afif bin Ayob (IC No : 87XXXX-XX-6655) the 1 st Aider. Evidence, all of them have attended the training on Basic Occupational First Aid and CPR.	
	All workplace being provided with 1^{st} Aid Kit under the custody of the mandora / field staff.	



Criterion / Indicator		Assessment Findings	Compliance	
		Estate has submitted JKKP 8 (I & II)/(IV) on annually basis to the DOSH. LTA calculation based on local interpretation from DOSH. At Bukit Tongkat B Estate, JKKP 8 was submitted on 15th January 2019.		
Criterio	Criterion 4.4.5: Employment conditions			
4.4.5.1	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. - Major compliance -	FGV/SED/POL/001 dated 29/5/2019 where the company respects for	Complied	
4.4.5.2	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.	FGV has established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 29/5/2019 where the company ensures all employees and workers shall receive equal treatment based on their relevant merits and competency regardless of gender, race, nationality, religion, age, physical condition, and marital status, reproductive rights of women, union membership/affiliation/ employment status, or political affiliation.	Complied	



Criterion / Indicator		Assessment Findings	Compliance
4.4.5.3	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. - Major compliance -	FGV Plantations (M) Sdn Bhd has established an employment contract for its foreign workers. Pay and conditions are documented and are above the Minimum Wage Order 2018. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Sampled of the pay slips confirmed that the workers were paid in accordance with Minimum Wage Order 2018.	Complied
4.4.5.4	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. - Minor compliance -	The contractors' workers signed on the employment contract where basic salary, annual leave and public holiday entitlement, termination of service and etc. was clearly outlined in the contract. Sampled of pay slips for contractors' workers in Bukit Tongkat B Estate Estate for July 2019 that have achieved Minimum Wage Order 2018 as below: i. IC No.: 87XXXX-XX-5511 ii. IC No.: 94XXXX-XX-6863 iii. IC No.: 92XXXX-XX-5931 iv. IC No.: 92XXXX-XX-5185 v. IC No.: 92XXXX-XX-5751 vi. IC No.: 86XXXX-XX-6335	Complied
4.4.5.5	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 Major compliance -	All the recruited workers are registered in the e-RML/ HRMS system where personal details such as name, nationality, date of employed, job description, wage rate, date of birth, gender and entitlement of public holiday was stated in the Labour Registration Form. Samples of the Labour Registration Form verified are as follows: i) Employee No: FW06010045 (BTB) ii) Employee No: LW01950087 (BTB) iii) Employee No: LW06010020 (BTB)	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.6	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. - Major compliance -	 iv) Employee No: LW06010118 (BTB) v) Employee No: FW06010020 (BTB) vi) Employee No: PI001919027 (UB) viii) Employee No.: PB001919029 (UB) ix) Employee No.: PB001919021 (UB) x) Employee No.: PB001919025 (UB) xi) Employee No.: PB001919020 (UB) Employment contracts were acknowledged and a copy is kept by the workers. This was verified through interview. The terms and conditions were clearly stated in the employment contract such as salary, termination of employment and probation period. Samples of employment contracts verified are as follows: i) Employee No: FW06010045 (BTB) ii) Employee No: LW06010020 (BTB) iv) Employee No: LW06010118 (BTB) v) Employee No: FW06010020 (BTB) vi) Employee No: P1001919027 (UB) viii Employee No: P8001919022 (UB) xii Employee No: P8001919025 (UB) xii Employee No: P8001919020 (UB) 	Complied
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.	The estates have implemented the Pocket Check roll system where the attendance and overtime can be verified through the system of individual workers. Samples of check-roll records are as follows:	Complied
		i) Employee No: FW06010045 (BTB)	

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.8	- Major compliance - 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.	 ii) Employee No: LW01950087 (BTB) iii) Employee No: LW06010020 (BTB) iv) Employee No: LW06010118 (BTB) v) Employee No: FW06010020 (BTB) vi) Employee No.: PI001919027 (UB) vii) Employee No.: PI001919029 (UB) viii) Employee No.: PB001919022 (UB) ix) Employee No.: PB001919021 (UB) x) Employee No.: PB001919025 (UB) xi) Employee No.: PB001919020 (UB) The working hour and break time have been clearly stated in the employment contract. Besides, the attendance record was available and able to trace through Pocket Check-roll system record. 	Complied
4.4.5.9	 Major compliance - Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. Major compliance - 	Documented payslip was distributed to individual workers on the day of payment. Wages and overtime were paid according to the Pocket Checkroll Record". Total hours of overtime and daily attendance has recorded in the time sheet. Samples of payslips for the months of Jan, Jun and Oct 2019 verified are as follows:	Complied
		 i) Employee No: FW06010045 (BTB) ii) Employee No: LW01950087 (BTB) iii) Employee No: LW06010020 (BTB) iv) Employee No: LW06010118 (BTB) v) Employee No: FW06010020 (BTB) vi) Employee No.: PI001919027 (UB) 	

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Criterio	n / Indicator	Assessment Findings	Compliance
		 vii) Employee No.: PI001919029 (UB) viii) Employee No.: PB001919022 (UB) ix) Employee No.: PB001919021 (UB) x) Employee No.: PB001919025 (UB) xi) Employee No.: PB001919020 (UB) All of them above have achieved the Minimum Wage Order 2018. Hours of overtime were also stated in the payslips. 	
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. - Minor compliance -	The management has provided facilities such as mosque, kindergarten and community hall to the workers and dependents. Government clinic was available in the complex. The workers will be granted bonus once a year based on performance of the workers. Incentive was given to the workers as well.	Complied
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 -	The workers housing in the estate is provided with basic facilities such as government clinic, football field, mosque, sundry shops and other amenities such as electricity and water supply from government. Line site inspection was carried out in Bukit Tongkat B Estate on weekly basis and inspection records were available for verification. Water and electricity has been subsidized by the company for RM 4 and RM 6 respectively.	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.	FGV has established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 29/5/2019 where FGV Group respects the rights of women as enshrined in Convention on the Elimination of All	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -	Forms of Discrimination against Women (CEDAW). FGV has also established procedure "Menangani Aduan Melalui Jawatankuasa Wanita" with Doc. No.: ML-1A/L2-Pr14(0) dated 1/6/2016 where Gender Committee has established to handle any sexual harassment, misconduct, discrimination and violence issue happen in the company. Process of report and handle of complaint has detailed in the procedure. The method of report of complain can be done via verbally and written to the Gender Committee Representative or call to the hotline. Interviewed with the female workers found that no sexual harassment or violence case reported so far.	
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 -	 FGV has established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 29/5/2019 where the company respects the rights of all its employees and workers to join and form associations, and to bargain collectively. The minutes of meetings between the mill management and the committee members of Felda Palm Industries Workers' Union are available. The meetings were held on 18-20 Sept 2019 (Persidangan Perwakilan Tiga Tahunan Kali Ke 15 Sesi 2019-2022) for Belitong POM and 23 May 2019 (Minit Mesyuarat Jawatankuasa Kerja Bil 73) and Minit Mesyuarat Kebajikan TKL Stesen Penyelidikan Ulu Belitong Bil (01)/2019 on 02nd April 2019. Among the issues discussed were request from different complexes such as: Penggeli POM: Includes the compassionate leave for grandchildren's death. Chini 3 POM: Increment and salary for old workers and service and menu in fasting season to be further improved. Bukit Tongkat B POM: to request that Yang Dipertua will 	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
4.4.5.14	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. - Major compliance -	 escalate any information with regards of union's journey to the members. 4. Ulu Belitong POM: Only information shared during the meeting, no complaint from workers. FGV has established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 29/5/2019 where the company is committed to ensure that its operations are free from any form of exploitation and to eliminate any form of forced and bonded labour, human trafficking and slavery, and child labour in all its operations. Besides, the company has developed "<i>Mengelak Penggajian Buruh Kanak-kanak</i>" procedure with Doc. No.: ML-1A/L2-Pr18(0) dated 1/6/2016 to provide a clear guideline to comply with the employment of children and young person. The company does not allow any individual below 18 years old to be employed. No employees below the age of 18 were sighted through verified the master list of employees and interviewed with the workers. 	Complied
Criterion	4.4.6: Training and competency		
4.4.6.1	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. - Major compliance -	FGV have established procedure on Kemampuan, Kesedaran dan Latihan Doc No: FGV/ML-1A/L2-Pr5, issue 1, version 0 dated 01.06.2016 with an objective to identify any new training needs annually based on evaluation on the competency level of existing and new personnel measured against their respective scope of work. The training plan for 2019 was sighted as follow: - NO TOPIC MONTH STATUS PROGRAMME	Complied
		PROGRAMME Bukit Tongkat B Estate	

Criterio	n / Indicator		Assessmer	Compliance		
		1	Penerangan Polisi & Manual Keselamatan	29/8/2019	7/10/2019	
		2	Keselamatan Menunggang Motosikal	13/11/2019	24/6/2019	
		3	Amalan Keselamatan tempat kerja	18/2/2019	5/7/2019	
		4	First Aid	26/8/2019	7/10/2019	
		5	Latihan Penuaian	22/8/2019	26/9/2019	
		6	Latihan Membaja	15/10/2019	30/4/2019	
		7	Latihan HCV	12/7/2019	30/10/2019	
		Ulu E	Belitong Estate			
		1	Keselamatan Menunggang Motosikal	Monthly	30/1/2019 28/2/2019	
		2	Aktiviti Menuai	September	26/9/2019	
		3	Aktiviti Membaja	Мау	14/5/2019	
		4	Aktiviti Meracun	July	16/7/2019	
		5	Larangan Pembakaran Terbuka	June	12/6/2019	
		6	Penerangan First Aid	February	22/2/2019	
		7	Memadam Kebakaran & Evakuasi	July	12/7/2019	
		8	Penerangan GSP	October	15/10/2019	
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the		training plan is created bas s involved in the operations.		Complied	

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Criterio	on / Indicator	Assessment Findings	Compliance
	training programmes in order to provide the specific skill and competency required to all employees based on their job description.	Sighted the Training Need Analysis of all workers which are based on their competencies and job description under document 'Analisa Keperluan Latihan Petugas dan Pekerja"	
	- Major compliance -		
implemented to ensure that all employees are well an trained in their job function and responsibility, in sta		The Estate has a comprehensive annual training plan for its staffs and workers and this was sighted in the training records file for each staffs and workers	Complied
	accordance to the documented training procedure Minor compliance -	Trainings conducted were recorded in the various trainings record and completed with attendance records, training materials and photographs of the training.	
4.5 Prin	ciple 5: Environment, natural resources, biodiversity	and ecosystem services	
Criterio	n 4.5.1: Environmental Management Plan		
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	FGV have established the Group Sustainability Policy [FGV/SED/POL/001, rev. 3, 29 th May 2019 signed by Chairman, Board of Directors YBHG Datuk Wira Azhar Abdul Hamid. The purpose of the policy is to established the objectives and guidelines for FGV and its Group of Companies with regards to sustainability matters. The policy covering the followings: -	Complied
		 Social Responsibility Profitability and Use of Resources Environmental Stewardship Value Chain Transparency and Reporting 	



Criterion / Indicator Assessment Findings Compliance Environmental Aspects and Impacts Analysis being established 4.5.1.2 The environmental management plan shall cover the Complied under Pengenalpastian Aspek dan Penilaian Impak, No Borang: following: FGV/ FGVPM/IV/IMS/15/1.6 Pind 1 dated 3rd January 2018. The a) An environmental policy and objectives; EAIA covering 44 activities for instance: b) The aspects and impacts analysis of all operations. 1. Spraying 2. Pre-mix at Store - Major compliance -3. Storage of Chemical 4. FFB evacuation to mill 5. Manuring 6. Landfill 7. ETC Sighted the Pengenalpastian Aspek dan Penilaian Impak for the year 4.5.1.3 An environmental improvement plan to mitigate the negative Complied 2019 developed to mitigate the negative impacts and to promote the impacts and to promote the positive ones, shall be developed, positive one and effectively implemented and monitored. Sample effectively implemented and monitored. taken as follows: - Major compliance -

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Criterio	on / Indicator		Assessment Findings					
		Activiti Penggunaan kenderaan mengangkut baja	Aspek Asap Hitam	Impak Pencemaran udara	Management Control Mengikut Prosedur Kerja Selamat - Jentera			
		Mengeluar dan memindah tong premix	Tumpah air premix	Pencemaran tanah dan air	SOP kerja premix			
		Penggunaan kenderaan mengangkut baja	diesel	Pencemaran air dan tanah	Pantau pengunaan diesel			
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Sighted the pr documented in Tongkat B Estat	Complied					
		1. Reduce planting Cobane						
		2. Reduce stacking		planting of cove	r crops and frond			
		 Control Disposa 						



Criterio	n / Indicator	Assessment Findings	Compliance
		5. Reuse of empty chemical containers for spraying activities	
4.5.1.5 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	All Estates have established training program for environmental management and improvement plan. Sighted the Environmental Training Programme for the year 2019 as below: -	Complied	
	objectives.	1. Bukit Tongkat B Estate	
- Major compliance -	a. Buffer Zone training on 30th November 2019 attended by 73 participants.		
		2. Ulu Belitong Estate	
		a. Penerangan Polisi Keselamatan, Kesihatan dan Alam Sekitar on 27 th September 2019 attended by 16 participants.	
		b. Penerangan Larangan Terbuka on 12 th June 2019 attended by 16 participants.	
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are	Regular two-way communication being conducted through environmental committee meeting, training and daily muster call.	Complied
	discussed.	Bukit Tongkat B Estate has conducted environmental meeting on 7 th October 2019 attended by 16 personnel	
		As for Ulu Belitong Estate, Group Sustainability Policy briefing was conducted on 17 th October 2019 attended by 16 participants.	
Criterior	4.5.2: Efficiency of energy use and use of renewable energy	JY	



Criterio	n / Indicator			Compliance			
4.5.2.1	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	Estates were l	kept and de energy and	ocumented. I the consu	It is monitore mption is mor	consumption of the ed to optimize use hitor on a monthly ws: -	Complied
	energy including fossil fuel, electricity and energy efficiency in the operations over the base period.		Todate Diesel	Todate FFB	Fuel Efficiency	Baseline value (2-yr average)	
	- Major compliance -		Liter	Mt	Lite	r/Mt FFB	
		Bukit Tongkat B	15,434	12,020	1.28	1.39	
4.5.2.2	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.	operations, ind efficiency of t	cluding fos their opera ansport and	sil fuel, and tions inclus d machinery	electricity to	le energy for their determine energy se by contractors, vas available in the	Complied
	- Major compliance -	Sample taken at Ulu Belitong Estate on estimate of diesel consumption as listed herein:					
		Estimate diesel: 4,200 liters					
		Estimate FFB: 3,551 Mt					
		Liters / Mt	FFB: 1.18				



Criterion / Indicator					Compliance			
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -		At the moment, there is no renewable energy been practiced at all Estates					
Criterio	n 4.5.3: Waste management and disposal							
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Penger Type o used F fibre,	All waste and pollution are identified and documented in the Pengenalpastian Bahan Buangan, Plantations – RSPO L1/K5.3/5.3.1. Type of wastes identified as fertilizer bags, plastic, glass, iron, paper, used PPE, tyre, HDPE containers, organic wastes, POME, EFB, shell, fibre, used oil, used oil filter. Sample taken at Felda Belitong B as follows: -					
		No	Buangan Terpakai	Impak / Kesan Pencemaran	Pelan T Guna Semula	indakan Kitar Semula		
		1	Beg Baja	Tanah	Diguna semula di mana sesuai	Dikumpul dan dijual di tempat kitar semula		
		2	Kertas	Pengurangan Sumber Semulajadi	Diguna semula kertas terpakai.	Dikumpul dan dijual di tempat kitar semula		
		3	Tong racun	Air dan Tanah	Guna semula untuk mengisi	Dikumpul dan dijual kepada		

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Criterio	on / Indicator		Assessment Findings				Compliance
			(HDPE)		air racun.	kontraktor	
		4	Tayar	Air, udara dan tanah		Guna untuk kerja keceriaan	
4.5.3.2	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:	No MI	d under Man 1A/L2-Pr19 rusan Sisa Pe	Non-conformity			
	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	Pusat	Belitong Est Penyelidikan ing to appoin				
	- Major compliance -		ce, all the w lidity period.				
		days v	kit Tongkat E validity perioc ted in the En				
		294/20 person	onmental Qua 005; Regulati 1 may store s ter its genera				
		1. not ex	The quanti ceed 20 metr		l wastes accumul	ated on site shall	



Criterio	n / Indicator			Assessment Fin	dings		Compliance
		As evide	ence;	Date Generated 28/2/2019, 0.0001	Date Disposed	Difference Days	
		Thus, a r	SW 409 non-conform	Mt nity report was assign	ned due to t	258 this lapse.	
4.5.3.3	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.	chemical Managen Bhd und	Sighted, Standard Operating Procedure for handling of used chemicals being established by Plantation Sustainability & Quality Management Department, Felda Global Ventures Plantations (M) Sdn Bhd under Document Number FGVPM/L3/PK-04 – Prosedur Kerja Selamat, Pengendalian Bahan Kimia dated 1 st April 2014.				
	- Major compliance -	registere	Seen, Chemical Hazardous To Health of Bukit Tongkat B Estate registered 7 chemicals and the data prepared by the Assistant Manager dated 25 th September 2019.				
4.5.3.4	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	Empty Chemical Containers were sold to recycle vendors and the record being documented in Borang Pemulangan, Kitar Semula dan Bilasan 3 kali Bekas Racun Perosak. The empty chemical containers being triple rinsed and sold to recycle vendor.					
	manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.	Recycle		Belitong Estate, 50 dated 21 st Augus g RM25.00.			
	- Major compliance -						



Criterio	n / Indicator	Assessment Findings	Compliance
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses Minor compliance -	Domestic waste from both Estate being disposed to landfill in the Estate. The designated is far from residential and waterways. Nonetheless, during site visit at Bukit Tongkat B workers housing, it was found out that domestic wastes were disposed behind Block Seri Alamanda & Dahlia. The drain behind the toilet of Dahlia was also full of wastes. Thus, a non-conformity report was assigned sue to this lapse.	Non-conformity
Criterior	4.5.4: Reduction of pollution and emission		
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	The polluting activities has been assessed during Environmental Aspect and Impact Assessment. The EAIA assessment findings including list of polluting sources are recorded in document titled Pengenalpastian Aspek dan Penilaian Impak, No Borang: FGV/ FGVPM/IV/IMS/15/1.6 Pind 1	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The action plan to reduce the polluting activities has been assessed during Environmental Aspect and Impact Assessment. The EAIA assessment findings including list of polluting sources, risk and mitigation plan have been documented in the Pengenalpastian Aspek dan Penilaian Impak,	Complied
Criterior	4.5.5: Natural water resources	·	
4.5.5.1	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:	Both Estates have drawn -up Water Management Plan. The plan focusing on water shortage, fire incidence and flood. In the plan stated the root cause, mitigation plan and Person In Charge for each plan.	Complied



terion / Indicator	Assessment Findings	Compliance
 a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities. 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.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones 	Each estate having a river passing through the estate, namely Sungai Penggeli at Bukit Tongkat Estate and Sungai Belitong at Ulu Belitong Estate. Monitoring of incoming and outgoing water was conducted. Sample taken at Bukit Tongkat B Estate and the water sample analysis being conducted on 17 th October 2019. The result as follows:	
at or before planting or replanting, along all natural waterways within the estate.e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.	Hulu Sungai InHulu Sungai OutHulu Sungai InHulu Sungai OutHulu Sungai Out9467946894699470	
 f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. Major compliance - 	Ph 7.6 6.6 6.4 6.4 BOD 7.0 4.0 3.0 11.0 COD 78 12 12 137 Total Solid 640 83 83 293 Suspended Solids 618 2 4 14	



Criterio	Criterion / Indicator			Assessment Findings					Compliance
			Oil & Grease	3	6	3	4		
			Ammoniacal Nitrogen	Nd(<5)	Nd(<5)	Nd(<5)	Nd(<5)		
			Total Nitrogen	2	3	3	3		
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.		No construction of bunds, weirs and dams across at Sungai Penggeli at Bukit Tongkat B Estate and Sungai Belitong at Ulu Belitong Estate.				Complied		
	- Minor compliance -								
4.5.5.3	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).	All estates did the road side drains in terrace area to store water. During site visit to estate, sighted in terrace area the implementation of road side drains. The road side drain well maintained by estate					ation	Complied	
	- Minor compliance -	management.							
Criterio	1 4.5.6: Status of rare, threatened, or endangered species a	nd hi	gh biodiversity	value					
4.5.6.1	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:	Laporan Biodiversiti Ladang FGVPM Bukit Tongkat B was last updated on 24 th January 2018 by Muhd Zulfadzli B Sufian Suri. Based on the report, the estate is located next to Kluang Forest Reserve and 16.45 hectare being identified as non-plantable steep areas at PM00H.				Complied			
	a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.	Bas ider	Based on the HCV Assessment report, there are RTE species identified in the plantation due to the reason that the estate is located adjacent to forest reserve.						
	b) Conservation status (<i>e.g.</i> The International Union on		ropriate measu			ıp electric	fencing at	the	
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Criterio	on / Indicator	Assessment Findings	Compliance
	Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.	estate's boundary to prevent encroachment of elephant, was applied at Bukit Tongkat B	
	- Major compliance -		
4.5.6.2	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:	Signage were installed within estate and boundary nearby to ensure no any illegal hunting activities occurred within estate field area. Awareness were given from time to time to all workers and to external stakeholders to discourage such activities and to prohibit	Complied
	 a) Ensuring that any legal requirements relating to the protection of the species are met. 	trespassing to conserved areas.	
	 b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. 		
	- Major compliance -		
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.	Management plan was established with implementation of monitoring records using a log book entitled "Kehadiran Haiwan Liar di Ladang"	Complied
	- Major compliance -	The report has information about name of animal, number of animal, location and observed by who.	
Criterio	n 4.5.7: Zero burning practices		
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in	Addressed in " <i>Polisi Larangan Pembakaran Terbuka</i> " [ML-1A/L1-Po14(0), pind. 0, 1/6/2014] signed by President & CEO FGV (Mohhammed Emir Mavani Abdullah). There were no use of fire	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
	specific situations, as identified in regional best practice. - Major compliance -	observed for waste disposal and for preparing land for oil palm cultivation or replanting	
4.5.7.2	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.	N/A. Details in 4.5.7.1 above	Complied
	- Major compliance -		
4.5.7.3	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.	N/A. Details in 4.5.7.1 above	Complied
	- Major compliance -		
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.	There was no use of fire observed for land preparation at the newly replanted field. The oil palm trunks were felled, chipped and windrowed.	Complied
	- Minor compliance -		
4.6 Prin	ciple 6: Best Practices		
Criterio	n 4.6.1: Site Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	The estate has implemented Good Agriculture Practice (GAP) as seen from fields visit, documents and interviewing the Estate personnel. The Standard Operating Procedures being adhered by the Estates as	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
4.6.1.2	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. - Major compliance -	 below: - 1. Manual Ladang Sawit Lestari Edisi 111 Seksyen 1 : Pengurusan Tapak Semaian Sawit Seksyen 2 : Pembangunan Tanam Semula Seksyen 3 : Sawit Pra matang Seksyen 4 : Sawit Matang Seksyen 5 : Pembajaan Sawit 2. Manual Keselamatan Kesihatan, Pekerjaan dan Alam Sekitar, FASSB dated 2nd January 2006 3. Manual Prosedur Pensijilan Minyak Sawit Mapan dated 1st June 2016 Sighted under Manual Prosedur Pensijilan Minyak Sawit Mapan, Doc No ML-1A/L2-Pr8(0), Revision: 0 Effective date: 01/06/2016 on Pengenalpastian Kawasan Cerun dan Rizab Sungai. The procedure stated the management strategy on slopes above a certain limit. Stated under clause 3.1.2- "memastikan Kawasan Rezab Sungai / Zon Penimbal dan Kawasan curam melebihi 25 darjah tidak diganggu semasa program pembangunan dan penanaman baru" During site visit at both Estates, observed there is no terracing above 25 Degrees. 	Complied
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	All estates have a visual reference system to identify each field or block. Each field has the signboard with block number, year of planting, progeny & hectare only.	Complied



Criterio	on / Indicator	Asse	ssment Fir	ndings		Compliance
Criterio	n 4.6.2: Economic and financial viability plan					
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	All estates had documented includes the projected FF projected for three years fro As evidence in Ulu Belitong	B, OER, PK om 2019-202	and etc p		Complied
		FY	2019	2020	2021	
		FFB (Mt / Ha)	27.64	28.74	29.89	
		FFB Price Per Mt (RM)	500.00	500.00	500.00	
		Ex-Estate Cost (RM/Mt)	127.83	122.18	118.36	
		Nett Profit (RM / Mt)	372.17	377.82	381.64	
4.6.2.2	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.	No replanting programme in next 5 years at Ulu Belitong and Bukit Tongkat B Estate.				Complied
	- Major compliance -					



Criterio	on / Indicator	Assessment Findings	Compliance	
4.6.2.3	 The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production : cost per tonne of FFB d) Price forecast e) Financial indicators : cost benefit, discounted cash flow, return on investment - Major compliance - 	Both estates have an annual operating budget for the calendar year 2019 and 3-years' projections (2019 - 2021) for expenditure, production and profit & loss.	Complied	
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	The estates performance is monitor through the monthly progress report. Details on the actual vs budget i.e. FFB production, Ex -estate cost and revenue & profit account are shown therein.	Complied	
Criterio	n 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Contract was signed by both parties through " <i>Surat Perintah Kerja</i> ". The terms and conditions were available as well as the Pricing mechanisms for the products and other services.	Complied	



Criterio	on / Indicator	Assessment Findings	Compliance	
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	 Sampled of contract agreement that signed by the contractors as below: Bukit Tongkat B Estate: Zaidan Joyoo Enterprise (Contract No: 5300003788) dated 24 Dec 2018 valid from 01.01.2019 – 31.12.2019 for transporting FFB to Belitong Mill and Ulu Penggeli Mill for 3000 MT x RM36.50 and RM47.00. FASSB Ulu Belitong Estate: Bukit Tongkat Enterprise SPK no: 820105001-18/820231101-12-208 dated 31 Dec 2018 valid until 31 Dec 2019 for transporting FFB from LadangSawit Pkt 1 2 & 3 Stesen FASSB Ulu Belitong Kluang to Kilang Sawit Ulu Belitong. Perniagaan Ama Bersatu SPK no: 820105001-19/820231502-3-44 dated 21 March 2019 valid until 31 Dec 2019 for transporting EFB from Kilang Sawit Ulung Belitong ke Ladang Sawit Pkt. 1,2 & 3 FGVAS Ulu Belitong. All the payments were made in timely manner. 	Complied	
Criterio	n 4.6.4: Contractor			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	The payment was made according to the rate agreed in the contract agreement before every 7 th of the month after received the total tonnage figure from mill during month end. There were also clear contract agreements for contractors providing services such as FFB transport, etc.	Complied	
		Interview with the contractors confirmed that the payment was made		



Criterio	on / Indicator	Assessment Findings	Compliance
		promptly by Belitong POM and Bukit Tongkat B Estate.	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor Major compliance -	The contractors have signed on the contract prior to provide services. Seen the contract agreement and details as refer to Indicator 4.6.3.2.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	FGV has agreed for BSI auditors to verify the assessment through a physical inspection if required.	Complied
4.6.4.4	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.	The estate management will have obtained the month end report for the FFB sent by contractors from mill and payment will be made according to the tonnage and agreed rate in the signed contract. Seen the payment voucher as below:	Complied
	- Major compliance -	 Voucher no: 350021543, dated 06/11/2019 for FFB prices Voucher no: 350021547, dated 06/11/2019 for FFB prices 	

Not applicable since there is no new planting at all the estates under FGV Belitong certification unit.



B) MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill

Criterio	n / Indicator	Assessment Findings	Compliance
4.1 Princ	ciple 1: Management commitment & responsibility		
Criterion	4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy		
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	 FGV have established the Group Sustainability Policy [FGV/SED/POL/001, rev. 3, dated 29th May 2019 signed by Chairman, Board of Directors YBHG Datuk Wira Azhar Abdul Hamid. The purpose of the policy is to established the objectives and guidelines for FGV and its Group of Companies with regards to sustainability matters. The policy covering the following aspects: - 1. Social Responsibility 2. Profitability and Use of Resources 3. Environmental Stewardship 4. Value Chain 5. Transparency and Reporting 	Complied
		Sighted, briefing on Group Sustainability Policy being conducted on 18 th October 2019 to all internal stakeholders covering 78 personnel.	
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	Sighted under Group Sustainability Policy stated FGV Group is committed to continuously improve its products and services by adopting the best possible approaches to enhance productivity and profitability by optimising resources and operational efficiencies, while minimising negative impacts on people, social and environmental.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
Criterion	4.1.2 – Internal Audit		
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Internal audit was conducted on 19 th September 2019 by two internal auditors, Muhammad Shafiq Ariffin and Yaslam Salleh for Ulu Belitong Mill.	Complied
4.1.2.2	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. - Major compliance -	FGV have established an Internal Audit Procedure, Doc No: FPI/L2/QOHSE-19.0, issue 2 dated 2 nd January 2008, revision on 8 th June 2018 version 5 as a reference for audit process. The audit findings were documented under Internal Audit Summary and total findings at Ulu Belitong Mill was 27% Non-conformities @ 15 criteria All details are well documented by Mill Management.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The internal audit report was documented and made available for management review. As evidence, all findings from internal audit was responded by Mill Management within the acceptable timeframe.	Complied
Criterion	4.1.3 – Management Review		
4.1.3.1	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. - Major compliance -	 Management review was conducted on 21st October 2019 chaired by the Mill Manager, En Amran bin Shariff and attended by 16 personnel. Other than internal audit matter, 7 more agendas were discussed and as follows: Customer satisfactory Production 	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	 Environment Social Replanting Management Review Continuous Improvement 	



Criterior	/ Indicator		Assessm	nent Findings	Compliance
Criterion	4.1.4 – Continual Improvement				
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.		· · ·	the mill being strategized under five gramme are as sample follows:-	Complied
	- Major compliance -		Category	Programme	
		1	Peningkatan hasil dan produktiviti	Meningkatkan OER	
		2	Mengawal Kesan social	Meningkatkan kemudahan telekomunikasi di Pusat Internet Desa	
		3	Mengurangkan kesan kepada alam sekitar	 Perlepasan asap hitam Takat pengeluaran akhir effluent 	
		4	Mengurangkan bahan buangan dengan memaksimumkan kitar semula	 Guna semula kertas terpakai di pejabat Penggunaan tandan kosong di ladang 	
		5	Mengawal kesan pembebasan kesan rumah hijau	Kempen Mesra Alam dan Larangan Pembakaran Terbuka	
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.	app		nnovation equipment is subject to ology adopted by the Mill for Milling	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -		
4.2 Princ	iple 2: Transparency		
Criterion 4	1.2.1 – Transparency of information and documents relevant to MS	PO requirements	
4.2.1.1	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. - Major compliance -	FGV has developed " <i>Komunikasi, Penglibatan dan Rundingan</i> " procedure (Doc. No. FGV/ML-1A/L2-Pr12, Issue 1 dated 1/6/2016) where the procedure has stated the information that provided to the stakeholders such as policies, social impact assessment and environment aspects. FGV has conducted a combined stakeholder meeting on 24/5/2018 for PSD, Felda Segamat Region, FTPSB Segamat Region, FGVPM Segamat Region and FPISB Kluang Region. During the meeting, the management has explained the requirements of sustainable palm oil certification to all the stakeholders. Besides, briefing of policies and management procedures of sustainability was carried out during the meeting as well.	Complied
4.2.1.2	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. - Major compliance -	There is no restriction for the public to access the type of documents listed in the RSPO P&C standard at FGV. The means of communication have been spelt out in their " <i>Komunikasi, Penglibatan dan Rundingan</i> " procedure [doc. no.: ML-1A/L2-Pr12(0) dated 1/6/2016]. The application of the procedure has also been briefed to the stakeholders during stakeholders meeting. Among the means of communication were through morning muster between the management and the employees, notice boards, suggestion box, workers' representative, etc. Communication process with external	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
		stakeholders, medias and contractors was also spelt out in the procedure. List of documents which are publicly available was stated in the procedure according to the RSPO P&C standard requirement. Documents such as meeting minutes, OSH plan, HCV report, policies, SEIA, etc. were publicly available upon request. Apart from that, the Group Sustainability Policy can be accessed via the internet link, http://www.feldaglobal.com/sustainability/sustainability-governance/sustainability-policies/	
Criterion	4.2.2 – Transparent method of communication and consultation		
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	FGV has developed " <i>Komunikasi, Penglibatan dan Rundingan</i> " procedure [doc. no.: ML-1A/L2-Pr12(0) dated 1/6/2016] where the objective of the procedure is to provide an effective communication system with the stakeholders. The types of communication are such as with the internal workers, media, external stakeholders, contractors and suppliers. The time frame to be responded to external communication is within 2 weeks from the date of receipt of request and within 1 week from the date of investigation completed if it is requiring any investigation.	Complied
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	The Assistant Mill Manager has been appointed as officer that responsible for communication and negotiation for the mill. An appointment letter dated 17/9/2019 issued by the Mill Manager was available for verification.	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to	The mill management has developed stakeholder list which included government authorities, local communities, settlers, neighbouring	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
	input from stakeholders shall be properly maintained Major compliance -	plantations, contractors and suppliers. A combined stakeholder meeting for Segamat and Kluang region was conducted on 24/5/2018 with participation of relevant stakeholders such as local authorities, local communities, neighbouring plantations and contractors. Input of the stakeholders was incorporated into the meeting minutes by conducted the questionnaire with the stakeholders.	
Criterion	4.2.3 – Traceability		
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance -	 FELDA Palm Industries Sdn Bhd has established Standard Operating Procedure: Manual Operasi, dated 23rd October 2017 and Prosedur, Sistem Pengurusan Kualiti, Keselamatan, Kesihatan Pekerjaan dan Alam Sekitar dated 8th June 2018. The mill is receiving FFBs from own estates and outsourcing suppliers. The Manual Operasi and Prosedur, Sistem Pengurusan Kualiti, Keselamatan, Kesihatan Pekerjaan dan Alam Sekitar has outlined the traceability process flow as below: - a. Raw Material Reception: Security Guard House & Weighbridge Station b. Production & Storage: Production Unit and Storage Tanks c. Sales & Despatch: Products to Customer(s) 	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system.	The Management team holds the responsibility on regular inspection of traceability system. Periodical inspections also being conducted through Regional Controller, Internal Audit and Mill Advisor visit.	Complied
		The effectiveness of the monitoring will evidence in the internal audit and visit report findings.	
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system.	Pn Ain Nur Fatimah bt Zuraimi as the person incharge of traceability vide letter dated 17th September 2019 approved by Mr Amran Shariff, Mill Manager	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.	Purchases and sales will base on demand and has agreeable documentation with the supplier. As evidence, records of sales, delivery, or transportation of FFB being well maintained at the Mill.	Complied
4.3 Princ	ciple 3: Compliance to legal requirements		
Criterion	4.3.1 – Regulatory requirements		
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	 Belitong POM continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and CDD team. FGV Betlitong POM management unit had obtained and renewed license and permits as required by the law. Sample of license Belitong POM DOE License no. 001845, Compliance Schedule ref# S(B) A91/110/616/091, validity period 1/7/2019 -30/6/2020 Akta Bekalan Elektrik 1990 – Electrical installation license no: 	Non-conformity

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 Certified Environmental professional in the treatment of POM-Pond Processes (CEPPOME; No: 16001) Certified Environmental professional in Scheduled Waste Management - (CePSWaM/170429) Certificate of Fitness for Lifting Equipment, Unfired Pressure Vessel (UPV) approval from Jabatan Tenaga Semenanjung Malaysia for deduction of salary for items such as sport club fee, scheme insurance and housing loan, electricity and water. Seen the permits with Serial No.: PP3/34/1013 dated 16/1/2005 and Serial No.: PP3/34/0351 dated 15/9/2000. FGV Plantations (Malaysia) Sdn Bhd and Felda Holding Sdn Bhd has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia for deduction of wages for water, electricity, medical fees that exceeded limit and other advance. Seen the approval permit With Ref. No.: (22)dlm BHG. PU/9/129 JId 23 dated 26/4/2016 and Serial No.: PP3/34/0351 dated 15/9/2000 Permit Had Kerja Lebin Masa [ref.: BHG.PU/9/134 JId 18(17), dated 23/1/2019, limit = 130 hr/month Nonetheless, some evidence of compliance for some legal requirements was not adequately demonstrated as follows: i) the Audiometry Test was conducted on 16th October 2018 to 35 employees. 2 workers namely, En Asmadi bin Amat (711104-01-5081) and En. Parizan bin Abd Kadir (770618-01-6807) was under Standard Threshold Shift. However, no evidence, re-test being conducted as per Regulation 23. 	Criterion / Indicator	Assessment Findings	Compliance
II) there was a female worker (Worker ID: 1210638) has worked		 Pond Processes (CEPPOME; No: 16001) Certified Environmental professional in Scheduled Waste Management - (CePSWaM/170429) Certificate of Fitness for Lifting Equipment, Unfired Pressure Vessel (UPV) approval from <i>Jabatan Tenaga Semenanjung Malaysia</i> for deduction of salary for items such as sport club fee, scheme insurance and housing loan, electricity and water. Seen the permits with Serial No.: PP3/34/1013 dated 16/1/2005 and Serial No.: PP3/34/0351 dated 15/9/2000. FGV Plantations (Malaysia) Sdn Bhd and Felda Holding Sdn Bhd has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia for deduction of wages for water, electricity, medical fees that exceeded limit and other advance. Seen the approval permit with Ref. No.: (22)dlm BHG. PU/9/129 Jld 23 dated 26/4/2016 and Serial No.: PP3/34/0351 dated 15/9/2000 Permit Had Kerja Lebih Masa [ref.: BHG.PU/9/134 Jld 18(17), dated 23/1/2019, limit = 130 hr/month Nonetheless, some evidence of compliance for some legal requirements was not adequately demonstrated as follows: i) the Audiometry Test was conducted on 16th October 2018 to 35 employees. 2 workers namely, En Asmadi bin Amat (711104-01- 5081) and En. Parizan bin Abd Kadir (770618-01-6807) was under Standard Threshold Shift. However, no evidence, re-test 	

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Criterio	n / Indicator	Assessment Findings	Compliance
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -	 after 10 p.m. However Belitong POM didn't have the permit from the Labour Department for female working after 10 p.m. iii) the workers housing weekly inspection was not conducted on weekly basis. Based on the inspection report, the dates of the inspection are as follows: Last: 11/11/2019 2nd last: 24/9/2019 3rd last: mid-Aug 2019 Thus, a non-conformity report was assigned due to this lapse. The applicable laws identified were listed in Daftar Perundangan dan Lain-lain Keperluan (Register of Legal and Other Requirements,- The sample of Act and Legal as listed herein: OSHA 1994 FMA 1967 Pesticide Act 1974 Electrical Supply (Amendment) Act 2015 Fire Services Act Environmental Quality Act Local Government Act 	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.	The mechanism of tracking changes and update are guided by procedure on Pematuhan Undang – Undang dan Keperluan Lain, Doc No: FGV/ML-1A/L2-Pr6, issue 1, version 0 dated 01.06.2016.	Complied
	- Major compliance -		



Criterio	n / Indicator	Assessment Findings	Compliance
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.	En Mohd Shahariezal bin Zainudin as the person in-charge of legal requirement vide letter dated 5 th June 2018 approved by Mr Yusrizam Shah bin Abdullah, Mill Manager	Complied
	- Minor compliance -		
Criterio	n 4.3.2 — Lands use rights		
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	The mill holds 1 land title (under FELDA Ulu Belitong Scheme) which they leased from FELDA for approximately 13.51 hectares for a period of 30 years from 1/1/1994 and expire on 31/12/2023. Copy of land title was available for verification.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.	This can be seen through an agreement between FELDA and FELDA Palm Industries Sdn Bhd. FELDA Palm Industries Sdn Bhd has legally changed its name to FGV Palm Industries Sdn Bhd [ref.: Certificate of Incorporation on Change of Name of Company, dated 11/12/2018]. Copy of land title was available for verification.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable Major compliance -	The mill has its perimeter fencing which meant to demarcate its boundary.	Complied
4.3.2.4	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).	There is no land dispute in the Belitong POM at the time of audit. The lands are belonging to FELDA – Ulu Belitong Scheme by verified through the agreement. The surrounding is owned by settlers. There was no encroachment of land by the Belitong POM.	Complied



Criterior	n / Indicator	Assessment Findings	Compliance
	- Minor compliance -		
Criterion	4.3.3 – Customary rights		
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 -	The mill land is legally owned by FELDA and leased to FGV Palm Industries Sdn Bhd. The existing land is not encumbered by any customary land rights.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	The mill land is legally owned by FELDA and leased to FGV Palm Industries Sdn Bhd. The existing land is not encumbered by any customary land rights.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	The mill land is legally owned by FELDA and leased to FGV Palm Industries Sdn Bhd. The existing land is not encumbered by any customary land rights.	Complied
4.4 Princi	iple 4: Social responsibility, health, safety and employmen	t condition	
Criterion	4.4.1: Social Impact Assessment (SIA)		
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 -	The SIA with was carried out on 23/1/2018 and 24/1/2018 for the Mill and Bkt Tongkat B Estate and Ulu Belitong Estate, respectively. Records of consultation such as attendance lists and inputs received from stakeholders are being documented. Those who attended include workers (foreign and local), contractors, etc. Records of meetings are documented in the SIA report itself.	Complied
Criterion	4.4.2: Complaints and grievances		



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	FGV has developed procedure of "Menangani Aduan dan Rungutan" (Doc. No.: FGV/ML-1A/L2-Pr13, issue 1, rev. 0, dated 1/6/2016). The objectives of the procedure are to provide a channel for the internal stakeholders and external stakeholders to lodge any complains to the management. Mechanism to handle the complains was clearly described in the procedure. The scope of the procedure covered the complaints related to management, housing complex, settlers and other welfare issues. There are 5 stages of process for internal complaint. The time frame for investigation of the issue should be done within 14 working days.	Complied
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	Belitong POM has implemented Complaint and Response Form/ Book to record complaints or requests from the stakeholders. All the issues recorded were about defects of housing facilities. Based on the records of complaints lodged, the actions taken by the management were appropriate and timely manner.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	The complaint record book was available in the office area where the stakeholders can easily access to lodge their complaint.	Complied
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -	Interview with internal and external stakeholder during stakeholder consultation found that they were aware of the complaint procedure and were briefed by the management during stakeholder meeting.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.	The management has implemented the complaint record book since September 2014. The records of complaint were available from September 2014 up to date.	Complied
	- Major compliance -		
Criterion	4.4.3: Commitment to contribute to local sustainable developmen	t	
4.4.3.1	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. - Minor compliance -	The management has made contribution to the local communities such as given hampers for the school's events, contributed black soils to the school for tree planting, supplied EFB to the other estates. Seen the request letters from the stakeholders and acknowledgement by the stakeholders upon receipt of the contribution.	Complied
Criterion	4.4.4: Employees safety and health		
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and	FGV Holdings Berhad has established Safety and Health Policy signed by the Group CEO, Dato' Haris Fadzilah Hassan on 8 th May 2019.	Complied
	Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.	Furthermore, FELDA Palm Industries Sdn Bhd also established policy on Dasar Kualiti, Keselamatan, Kesihatan Pekerjaan dan Alam Sekitar	Complied
	- Major compliance -	dated 20 th November 2017 signed by Chief Executive Officer, En Mohamad Saodi bin Husin.	
		The policy and plan were communicated to the employees through various methods such as trainings, briefings and display on notice boards.	


Criterior	ı / Indicator	Assessment Findings	Compliance
Criterior	 A Indicator The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; 	Assessment FindingsFGV Holdings Berhad has established Safety and Health Policy signed by the Group CEO, Dato' Haris Fadzilah Hassan on 8th May 2019.Furthermore, FELDA Palm Industries Sdn Bhd also established policy on Dasar Kualiti, Keselamatan, Kesihatan Pekerjaan dan Alam Sekitar dated 20th November 2017 signed by Chief Executive Officer, En Mohamad Saodi bin Husin.Risk assessment was conducted through HIRARC based on the severity and the likelihood. HIRARC is consist of hazard identification (type of work activity, hazard & effect), Risk analysis (Existing risk control, likelihood, severity & risk) & Risk Control (Recommended control measures & PIC appointed are Staff or Executive). HIRARC	Compliance
	 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). 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. f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of 	 sighted for the followings work operation: - Main Entrance Weighbridge Office Grading Loading Ramp Sterilizer Capstan Press 	

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Criterion / Indicator		Assessmer	nt Findings		Complianc
 trust shall have knowledge and access to latest national regulations and collective agreements. 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 ant the concerns of employees and any remedial actions taken shall be recorded. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite. j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. - Major compliance - 	The Mil Worker	Kernel Plant Oil Room Boiler Etc being reviewed on 2 nd May I has a comprehensive ann s and this was sighted in nd workers. Sample training TOPIC Bekerja Di Tempat Tinggi Latihan pemasangan alat kebakaran Keselamatan Bahan Kimia semasa kerja Fire Drill First Aid Scheduled Waste	ual training plan the training rec	ords file for ea	

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Criterion / Indicator	Assessment Findings	Compliance
	Samples training conducted on Latihan Dalam Bekerja di Tempat Tinggi dated 12 th November 2019 attended by 5 participants. Trainings record was completed with attendance records, training materials and photographs.	
	Mill has provided appropriate PPE for all workers in their operations. PPE Issuance and replacement record. Sighted for: - a.Staff/AP b. General Workers	
	During field visit, sighted the workers have been trained with safety and the workers wear the PPE required by his/her works.	
	All workers involved in the operations have been adequately trained in safe working practice.	
	Sighted, Standard Operating Procedure for handling of used chemicals being established by Plantation Sustainability & Quality Management Department, Felda Global Ventures Plantations (M) Sdn Bhd under Document Number FGVPM/L3/PK-04 – Prosedur Kerja Selamat, Pengendaian Bahan Kimia dated 1st April 2014.	
	CHRA report dated 3rd May 2016 reported by Mr. Nor Mohd Razif	

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Criterion / Indicator	Assessment Findings	Compliance
	Noraini, JKKP HIE 127/171-2(286) by MZ Enviro Testing and Consulting.	
	A total of 16 workers have undergone medical surveillance on 10 th November 2108 covering mechanical (3), laboratory (5), Assistant manager (1), Boiler (4), store (1) and Electrician (2). They were tested on Physical examination, Blood, Urine, Cholinesterase and Chest X-ray. 2 workers were unfit and re-assigned to other work category.	
	Person incharge of OSH is Mr. Amran bin Shariff, The Mill Manager appointed on 15 th July 2019 by En. Abdul Malik Sekak, Ketua Zon 2.	
	Latest, OSH Meeting was conducted on 28 th August 2019 attended by 13 representatives.	
	1 major and 1 minor accident being recorded in 2018. Sighted the emergency procedure for the Mill. Emergency response plan available in local language (Malay and English). The ERP has been explained to all workers and staffs during training which has been conducted.	
	Emergency response plan include the emergency contact number, and also have Guidelines on Accident, Emergency Procedures and Exit routes as well as assembly point in file and pasted on notice	

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Criterio	n / Indicator	Assessment Findings	Compliance
Criterion	4.4.5: Employment conditions	 board. The first aider for the is Mr. Hamidun bin Ahmad (IC No: 62XXXX-XX-5443) 5 workplaces, Laboratory, workshop, operation, boiler and effluent being provided with 1st Aid Kit under the custody of the appointed personnel. Mill has submitted JKKP 8 (I & II)/(IV) on annually basis to the DOSH. LTA calculation based on local interpretation from DOSH. JKKP 8 was submitted on 24th January 2019 	
4.4.5.1	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. - Major compliance -	The company established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 29/5/2019 where the company respects for the human rights. is committed to ensure that its operations are free from any form of exploitation and to eliminate any form of forced and bonded labour, human trafficking and slavery, and child labour in all its operations.	Complied
4.4.5.2	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	FGV has established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 29/5/2019 where the company ensures all employees and workers shall receive equal treatment based on their relevant merits and competency regardless of gender, race,	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
	characteristics. - Major compliance -	nationality, religion, age, physical condition, and marital status, reproductive rights of women, union membership/affiliation / employment status, or political affiliation.	
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	FGV Plantations (M) Sdn Bhd has established an employment contract for its foreign workers. Pay and conditions are documented and are above the Minimum Wage Order 2018. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Sampled of the pay slips confirmed that the workers were paid in accordance with Minimum Wage Order 2018.	Complied
4.4.5.4	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.	There was no permanent contractor engaged by the mill. Most of the maintenance and repair works are carried out by their own technicians. Therefore, there was no issue on the wages of employees of contractors.	Complied
	- Minor compliance -		
4.4.5.5	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.	All the recruited workers will be registered in the Biodata Form where personal details such as name, nationality, date of employed, job description, wage rate, date of birth, gender and entitlement of public holiday was stated in the biodata form. Samples of the Labour Registration Form verified are as follows:	Complied
	- Major compliance -	 i) Employee ID: 1207048 ii) Employee ID: 1211630 iii) Employee ID: 1211536 iv) Employee ID: 1210838 v) Employee ID: 1210700 	



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.5.6	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 -	Offer letters were acknowledged and kept a copy by the workers verified through Interview with the workers. The terms and conditions were clearly stated in the offer letter such as salary, termination of employment and probation period. Sampled of offer letters as below: i) Employee No.: 1210070 ii) Employee No.: 1210838 iii) Employee No.: 1211630 iv) Employee No.: 1211536 v) Employee No.: 1207048	Complied
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	The working hours are recorded using punch card system where the attendance can be verified through the punch card of individual workers. The time enter, break time and exit of work were also clearly stated in the punch card. Sampled of time card as follows: i) Employee No.: 1210070 ii) Employee No.: 1210838 iii) Employee No.: 1211630 iv) Employee No.: 1211536 v) Employee No.: 1207048	Complied
4.4.5.8	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 -	Based on the records review of the Punch card of sampled workers it was found that the entry time and exit time which were clearly stated in the punch card, conformed to the terms and conditions stipulated in the collective agreement [ref.: Perjanjian Bersama antara FGV Palm Industries Sdn Bhd dengan Kesatuan Pekerja-pekerja FGV Palm Industries Sdn Bhd Semenanjung, validity 1/1/2019 to 31/12/2021. The workers have worked less than 130 hours of overtime per month.	Complied

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Criterion	/ Indicator	Assessment Findings	Compliance Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance - 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	Documented payslip was distributed to individual workers on the day of payment. Wages and overtime were paid according to the "Punch Card". Total hours of overtime and daily attendance has recorded in the time card. The following payslip were sampled for Jan 2019, Jun 2019 and Oct 2019 as below: i) Employee No.: 1210070 ii) Employee No.: 1210838 iii) Employee No.: 1211630 iv) Employee No.: 1211536 v) Employee No.: 1207048 All of their pay have achieved the Minimum Wage Order 2018. Hours of overtime were recorded in the overtime form. The management has provided facilities such as mosque, kindergarten and community hall to the workers and dependents. Government clinic was available in the complex. The workers will be granted bonus once a year based on performance of the workers.	
	improvement of social surroundings. - Minor compliance -	Incentive was also given to the workers.	
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	The mill workers housing is provided with basic facilities such as government clinic, football field, mosque, sundry shops and other amenities such as electricity and water supply from government. Line site inspection was carried out in Belitong Mill workers housing on weekly basis and inspection records were available for verification.	Complied
		Inspection frequency still not meeting the weekly requirement i.e.	
		Last: 11/11/2019	

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Criterior	/ Indicator	Assessment Findings	Compliance
		2 nd last: 24/9/2019 3 rd last: Aug 2019	
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	FGV has established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 29/5/2019 where FGV Group respects the rights of women as enshrined in Convention on the Elimination of All Forms of Discrimination against Women (CEDAW). FGV has also established procedure "Menangani Aduan Melalui Jawatankuasa Wanita" with Doc. No.: ML-1A/L2-Pr14(0) dated 1/6/2016 where Gender Committee has established to handle any sexual harassment, misconduct, discrimination and violence issue happen in the company. Process of report and handle of complaint has detailed in the procedure. The method of report of complain can be done via verbally and written to the Gender Committee Representative or call to the hotline. Gender committee and KKD committee has also been established in the mill to monitor and handle sexual harassment and violence case in the mill. The gender committee has last conducted a meeting on 7/11/2019. There has been no report with regards to sexual harassment or violence since the last assessment.	Complied
4.4.5.13	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.	FGV has established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 29/5/2019 where the company respects the rights of all its employees and workers to join and form associations, and to bargain collectively. The minutes of meetings between the mill management and the committee members of Felda Palm Industries Workers' Union are available. The meetings were held on 18-20 Sept 2019 (Persidangan Perwakilan Tiga Tahunan Kali Ke 15 Sesi 2019-	Complied

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Criterion / Indicator	Assessment Findings	Compliance
Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance - 4.4.5.14 Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. - Major compliance -	 2022) for Belitong POM and 23 May 2019 (Minit Mesyuarat Jawatankuasa Kerja Bil 73) and Minit Mesyuarat Kebajikan TKL Stesen Penyelidikan Ulu Belitong Bil (01)/2019 on 02nd April 2019. Among the issues discussed were request from different complexes such as: Penggeli POM: Includes the compassionate leave for grandchildren's death. Chini 3 POM: Increment and salary for old workers and service and menu in fasting season to be further improved. Bukit Tongkat B POM: to request that Yang Dipertua will escalate any information with regards of union's journey to the members. Ulu Belitong POM: Only information shared during the meeting, no complaint from workers. FGV has established Group Sustainability Policy with Policy No.: FGV/SED/POL/001 dated 29/5/2019 where the company is committed to ensure that its operations are free from any form of exploitation and to eliminate any form of forced and bonded labour, human trafficking and slavery, and child labour in all its operations. Besides, the company has developed "<i>Mengelak Penggajian Buruh Kanak-kanak</i>" procedure with Doc. No.: ML-1A/L2-Pr18(0) dated 1/6/2016 to provide a clear guideline to comply with the employment of children and young person. The company does not allow any individual below 18 years old to be employed. No employees below the age of 18 were sighted through verified the master list of employees and interviewed with the workers. 	Complied



Criterio	n / Indicator		Assessme	nt Findings		Compliance
4.4.6.1	 4.4.6.1 All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance - 		ave established procedure Doc No: FGV/ML-1A/L2 2016 with an objective to ly based on evaluation on the ersonnel measured against to g plan for 2019 was sighted	Pr5, issue 1, identify any no ne competency le heir respective s	version 0 dated ew training needs evel of existing and	Complied
		NO	TOPIC	MONTH PROGRAMME	STATUS	
		1	Bekerja Di Tempat Tinggi	November	12/11/2019	
		2	Latihan pemasangan alat kebakaran	Мау	24/6/2019	
		3	Keselamatan Bahan Kimia semasa kerja	Мау	21/5/209	
		4	Fire Drill	Feb	1/10/2019	
		5	First Aid	Feb	18/10/19	
		6	Scheduled Waste	August	9/8/2019	
4.4.6.2	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		training plan is created bas s involved in the operations		Needs Analysis for	Complied
	competency required to all employees based on their job description.	Sighted the Training Need Analysis of all workers which are based on their competencies and job description under document 'Analisa				
	- Major compliance -		uan Latihan Petugas dan Pe			



Criterio	n / Indicator	Assessment Findings	Compliance
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.	The Mil has a comprehensive annual training plan for its staffs and workers and this was sighted in the training records file for each staffs and workers	Complied
	- Minor compliance -	Trainings conducted were recorded in the various trainings record and completed with attendance records, training materials and photographs of the training.	
4.5 Princ	ciple 5: Environment, natural resources, biodiversity and ec	cosystem services	
Criterion	4.5.1: Environmental Management Plan		
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. - Major compliance -	FGV have established the Group Sustainability Policy [FGV/SED/POL/001, rev. 3, 29 th May 2019 signed by Chairman, Board of Directors YBHG Datuk Wira Azhar Abdul Hamid. The purpose of the policy is to established the objectives and guidelines for FGV and its Group of Companies with regards to sustainability matters. The policy covering the followings: -	Complied
		 Social Responsibility Profitability and Use of Resources Environmental Stewardship Value Chain Transparency and Reporting 	
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives;	Environmental Aspects and Impacts Analysis being established under Borang Pengenalan Aspek Alam Sekitar dan Penilaian Impak, No Borang: FPI/L4/QOHSE- 1.7 Pind 0 dated 21 ST January 2019.	Complied
	b) The aspects and impacts analysis of all operations	The EAIA covering 21 activities for instance: -	

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Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -	 Weighbridge Grading Loading Ramp Sterilizer Crane, threshing & press Oil Room Incinerator FFB Oil Tank Water Treatment Plant Boiler Effluent treatment plant Laboratory Diesel storage Workshop Store Oil Trap Schedule Waste Store Schedule Waste Storage Area Canteen Upon identification of the Aspect & Impact, the scoring evaluation being updated under Significant Environmental Aspects and Impacts Registrar Form, Borang: FPI/L4/QOHSE-1.8 Pind 0 for the mitigation plan.	
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.	The Significant Environmental Aspects and Impacts Registrar Form, Borang: FPI/L4/QOHSE-1.8 Pind 0 has indicate the Mill activities and mitigation measures as sample follows:-	Complied

Criterion / Indicator			Assessment Findings					
	- Major compliance -	Process	Aspect	Impact	Management Control			
		Pintu Utama	Penerimaan BTS	Air pollution	Pelan tindakan kecemasan, rujuk manual prosedur			
		Bilik Minyak	MSM Tumpah	Land Contamination	Pelan tindakan kecemasan, rujuk manual prosedur			
		Dandang	Perlepasan habuk	Air pollution	Pelan tindakan kecemasan, rujuk manual prosedur			
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan.		med to promot provement Plan		impacts sighted in	the	Complied	
	- Minor compliance -	 Perlepasan asap hitam Takat pengeluaran akhir effluent Guna semula kertas terpakai di pejabat Penggunaan tandan kosong di ladang Larangan Pembakaran Terbuka 						
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working	The Mill have established training program for environmental management and improvement plan. Sighted the Environmental Training Programme for the year 2019 as below:					Complied	
	towards achieving objectives Major compliance -	 Briefing on Group Sustainability Policy being conducted on 18th October 2019 to all internal stakeholders covering 78 personnel. 						

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Criterio	n / Indicator		As	sessment Find	lings		Compliance
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.	Committee	The mill has conducted Environment Performance Monitoring Committee (EPMC) on half yearly basis. The latest was on 9 th November 2019 attended by 9 personnel, chaired by The Mill Manager.				
Criterion	4.5.2: Efficiency of energy use and use of renewable energy						
4.5.2.1	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 - Major compliance -	of Fuel U Transporte to optimize	Jsage for tra d. Data compi e the use of nor	ng POM, the mi insportation in led (3 years) fo n-renewable end actory monitori	Terms of r comparison a ergy. Records	Litre/MT FFB and monitored	Complied
		Mth	Diesel used (Liter)	FFB Processed	Litre/Mt		
		2017	206,919	294,960	0.70		
		2018	184,790	278,170	0.66		
		2019	92,393	141,990	0.65		
		Base	line value		0.60		
4.5.2.2	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,	Diesel esti	Sighted estimate of direct usage of non-renewable energy for 2019. Diesel estimate per MT FFB for 2019 with a total of 171,119 litres versus FFB to be processed of 261,300 mt or 0.65 litres/ton FFB.				Complied

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Criterio	n / Indicator	Assessment Findings	Compliance		
	including all transport and machinery operations. - Major compliance -				
4.5.2.3	The use of renewable energy should be applied when possible.	Fibre and shell were used as a source of renewable energy for boiler operations. Biomass production by the Mill as follows: -	Complied		
	- Minor compliance -	DescriptiTotal productionLocation of useon2019 (Mt)			
		1Shell619.79Boiler2Fiber720.84Boiler & Selling Outside			
Criterior	4.5.3: Waste management and disposal				
4.5.3.1	All waste products and sources of pollution shall be identified and documented.	The Mill has identified and registered the following waste under E- Swiss: - a. SW102 – Bateri Terpakai	Complied		
	and documented. - Major compliance - A SW102 – Bateri Terpakai b. SW 110 – Lampu Terpakai c. SW 305 – Minyak Pelincir Terpakai d. SW 306 – Minyak Hidraulik Terpakai e. SW 409 – Tin Cat Terpakai f. SW 410 – Filter dan Sarung Tangan Terpakai				



Criterio	n / Indicator			Assessme	ent Findings		Compliance
4.5.3.2	 A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for: a) Identifying and monitoring sources of waste and pollution. b) Improving the officiency and recycling potential of mill by 	Kualiti below	The schedule waste was disposed by approved license contractor, Kualiti Alam Sdn Bhd dated 15 th May 2019. The details as disposal as below:-				
	b) Improving the efficiency and recycling potential of mill by- products by converting them into value-added products.	No	CN Number	SW Code	Quantity (drum)		
	- Major compliance -	1		305	1		
		2		306	2		
		3	091453	410	1		
		4	051400	110	1		
		5	-	102	1		
		6	-	409	4		
4.5.3.3	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	Standard Operating Procedure for handling of used chemicals being established by Plantation Sustainability & Quality Management Department, Felda Global Ventures Plantations (M) Sdn Bhd under Document Number FGVPM/L3/PK-04 – Prosedur Kerja Selamat, Pengendalian Bahan Kimia dated 1 st April 2014.					Complied
	- Major compliance -						
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.	by the	appointed co	ntractor, M/S	al Complex and Mill I 5 Zaha Niaga Enterpr nt Landfill at Kluang.	ise. The waste	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	- Minor compliance -	is once a week.	
Criterion	4.5.4: Reduction of pollution and emission		
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.	The assessment of polluting activities are identified and documented in the Environmental Aspect And Impact Assessment. Furthermore, the mill also adherence to Jadual Pematuhan from Department of Environmental.	Complied
	- Major compliance -		
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The assessment of polluting activities are identified and documented in the Environmental Aspect And Impact Assessment. Furthermore, the mill also adherence to Jadual Pematuhan from Department of Environmental.	Complied
4.5.4.3	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant	POME is treated through the biological system with anaerobic lagoon and tertiary plant (membrane plant) in series for its treatment of effluent and discharged through water course.	Complied
	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.	POME discharge limits and method is in accordance with DOE Jadual Pematuhan. The latest analysis conducted was on 3 rd October 2019 for River Analysis and 17 th October 2019 on Final Discharge by FGV	
	- Major compliance -	Palm Industries Sdn Bhd as follows:-	

Criterio	Criterion / Indicator		Assessment Findings				
		Parameter	Final discharge	DOE Limit			
		pН	8.9	5-9			
		COD	551				
		BOD	10	20			
		Sus. Solid	254	<50			
		Amm-N	ND (<5)				
		Tot N	21	<200			
		Oil& Grease	3	< 5			
		Total Solid	4820				
Criterion	4.5.5: Natural water resources						
4.5.5.1	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:	The Mil have drawn -up on Mill Operation and source of water, root ca each plan.	e Complied				
	a) Assessment of water usage and sources.						
	b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.	Monitoring of incoming being discharge to wate conducted was on 3 rd	S				
	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.).	October 2019 on Final I		lm Industries Sdn Bhd a			
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Criterio	n / Indicator			Assessment F	indings		Compliance
	- Major compliance -		Parameter	Hulu Sungai	Hilir Sungai	DOE Limit	
			pН	7.2	7.7	5-9	
			COD	19	90		
			BOD	5	9	20	
			Sus. Solid	13	21	<50	
			Amm-N	ND (<5)	ND (<5)		
			Tot N	3	13	<200	
			Oil& Grease	2	ND (<2)	< 5	
			Total Solid	341	711		
4.5.5.2	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.						Complied
	- Major compliance -						
4.6 Princ	iple 6: Best Practices	<u> </u>					1
Criterion	4.6.1: Mill Management						
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	Mill capacity 54 MT/Hr – Sterilization is by conventional method. The mill has implemented Good Milling Practice (GMP) as seen from visit to the mill and seen from the document and also interviewing the mill personnel.					

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Criterion	/ Indicator	Assessment Findings	Compliance
		 The Standard Operating Procedures for the mill as follows: - Manual Operasi dated 30th January 2001 Revision on 17th November 2017 version 14. Prosedur, Sistem Pengurusan Kualiti, Keselamatan, Kesihatan Pekerjaan dan Alam Sekitar dated 2nd January 2008 Revision on 8th June 2018 version 17. Manual Operasi Makmal, dated 2nd January 2002 Revision on 13th January 2017 version 13. 	
		4. Senarai Prosedur Kerja Selamat (Pengurusan Keselamatan dan Kesihatan Pekerjaan) dated 26 th October 2018 Issue No 28.	
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	The mill is certified under RSPO and MSPO. However, mill has implemented Good Milling Practice (GMP) as per their own SOP's. The mill is operating in accordance to Jadual Pematuhan – Syarat-	Complied
Criterion 4	4.6.2: Economic and financial viability plan	Syarat Lesen Premis Minyak Kelapa Sawit Mentah, Jabatan Alam Sekitar Negeri Johor and all the Standard Operating Procedures.	



Criterio	n / Indicator	Assessment Findings							Compliance
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.								Complied
	- Major compliance -	Item	Unit	2019	2020	2021	2022		
		FFB	Mt	261,300	271,950	276,650	282,170		
		OER	%	19.90	19.80	20.00	20.10		
		CPO	Mt	51,993	53,846	55,330	56,716		
		KER	%	5.55	5.60	5.80	5.80		
		PK	Mt	14,501	15,229	16,045	16,366		
Criterion	4.6.3: Transparent and fair price dealing							I	
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented.	Pricing mechanism is guided by FGV's Group Procurement Policy, March 2018.						Complied	
	- Major compliance -	Sampled of contract agreement that signed by the contractors a below:					ctors as		
		faci #33 ii) Con area	lities - 8013306 tractor: a -	- ref.: 5 28/1300994	Surat Peri 359, dated Enterprise rat Perin	ntah Kerj 1/1/2019 for waste c tah Kerja	collection in	Order)	



Criterio	n / Indicator	Assessment Findings	Compliance
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	The manner of payment of remuneration shall paid by the company to contractor 30 days as stated in the <i>Surat Perintah Kerja</i> . Seen the invoice from contractors and payment voucher from the management as below:	Complied
		i) INV# 37/19 & 38/19 dated 17/10/2019, Payment Voucher# 352107233 dated 24/10/2019	
		ii) INV# KSB 0022 dated 1/11/2019, Payment Voucher# 352109824 dated 8/11/2019	
		All the payments were made in timely manner.	
Criterion	4.6.4: Contractor		
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	The contractors have acknowledged on a letter regarding the compliance of MSPO requirements and allowed the auditors to inspect relevant documents, operations and interview the workers whenever necessary. They were also briefed by the management regarding the MSPO requirements.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor Major compliance -	The contractors have signed on the <i>Surat Perintah Kerja</i> prior to provide services. Seen the contract agreement and details as refer to Criterion 4.6.3.1. Besides, the contractor has acknowledged on the approval for the auditor to be inspected if necessary.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if	FGV has agreed for BSI auditors to verify the assessment through a physical inspection if required.	Complied
	required.		

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Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings					
Based on the findings during the assessment FGV Plantations (Malaysia) Sdn Bhd – Belitong Palm Oil Mill an Supply Base Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended					
	ly Base Certification Unit is approved and/or continued.				
Acknowledgement of Assessment Findings	Report Prepared by				
Name:	Name:				
Ahmad Shahrir Bin Ismail	Valence Shem				
Company name:	Company name:				
FGV Holdings Berhad	BSI Services Malaysia Sdn Bhd				
Title:	Title:				
Senior Manager	Lead Auditor				
Signature:	Signature:				
<u> </u>	Joseph .				
	Date: 13/05/2020				
Date: 18/5/2020					



Appendix A: Assessment Plan

Date	Time	Subjects	VSH	IIS
Tuesday 12/11/2019	0830-0900	 Opening meeting: Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation) 		
	0830-1230	Bukit Tongkat B Estate 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, Scheduled wastes management, workers housing, clinic, Landfill, etc.	✓	~
	1230-1330	Lunch break		
	1330-1630	Bukit Tongkat B Estate Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	√	~
	1630-1700	Interim closing briefing	\checkmark	✓
Wednesday 13/11/2019	0900-1230	Belitong POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	✓	~
	1000-1200	Stakeholder consultation	\checkmark	-
	1230-1330	Lunch break		
	1330-1630	Belitong POM Document Review P1 – P6 (MSPO Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	~
	1630-1700	Interim closing briefing	\checkmark	~
Thursday 14/11/2019	0900-1230	<u>Ulu Belitong Estate</u> 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, Scheduled wastes management, workers housing, clinic, Landfill, etc.	√	✓
	1230-1330	Lunch break		
	1330-1600	<u>Ulu Belitong Estate</u> Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	~
	1600-1630	Audit team discussion & preparation for closing meeting	✓	~
	1630-1700	Closing meeting	\checkmark	~

Appendix B: List of Stakeholders Contacted

Internal Stakeholders

Workers' Representative Women's Representative Harvesters Mill Operators Sprayers General workers

External Stakeholders

Government Departments	NGOs and others	Local Communities
School (SMK Belitong) Klinik Desa (Medical Officer)	Nil	Contractors/Suppliers (Hamid Eng., Zaidan Jaya Ent., Bukit Tongkat Ent.) Surrounding communities (Ladang Benih)



Appendix C: Smallholder Member Details

Not applicable.



Appendix D : Location Map of Belitong Palm Oil Mill and Supply base





Map of FGVPM Bukit Tongkat B Estate







Map of FASSB Ulu Belitong Estate

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Appendix E: List of Abbreviations Used

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