

#### MALAYSIAN SUSTAINABLE PALM OIL 2<sup>nd</sup> SURVEILLANCE ASSESSMENT Public Summary Report

#### **Genting Plantations Berhad**

Client company Address: 10th Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia

Certification Unit:
Genting SDC Sdn Bhd
Genting Tanjung Palm Oil Mill
& Plantations including Genting Tanjung, Genting Tenegang, Genting
Landworthy, Genting Layang & Genting Bahagia Estate

Location of Certification Unit: Mile 97, Sandakan-Lahad Datu Road, Tenegang, Jalan Jeroco, 90200 Kinabatangan, Sabah, Malaysia

Report prepared by: Muhammad Fadzli b. Masran (Lead Auditor)

**Report Number: 9673576** 

#### **Assessment Conducted by:**

BSI Services Malaysia, Suite 29.01 Level 29, The Gardens North Tower, Mid Valley City, Lingkaran Syed Putra, 59200 Kuala Lumpur Tel +60392129638 Fax +60392129639 www.bsigroup.com



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#### **Section 1: Executive Summary**

| 1.1 Organizational Information and Contact Person |   |               |                                  |  |
|---|---|---------------|----------------------------------|--|
| MPOB License                                      | Mill: Genting Tanjung Oil Mill: 500137  | 7704000       |                                  |  |
|   | Estate: Genting Tanjung Estate: 5022  | 249802000     |                                  |  |
|   | Estate: Genting Tenegang Estate: 50-  | 4760102000    |                                  |  |
|   | Estate: Genting Landworthy Estate: 5  | 0382710200    | 0                                |  |
|   | Estate: Genting Layang Estate: 50475  | 59802000      |                                  |  |
|   | Estate: Genting Bahagia Estate: 5022  | 49802000      |                                  |  |
| Company Name                                      | Genting Plantations Berhad  |               |                                  |  |
| Address   | 10th Floor, Wisma Genting, Jalan Sul  | tan Ismail 50 | 250 Kuala Lumpur, Malaysia.      |  |
|   | Genting Tanjung Oil Mill, Mile 97, Sandakan-Lahad Datu Road, Tenegang, Jalan Jeroco 90200 Kinabatangan, Sabah, Malaysia |               |                                  |  |
| Group name if applicable:                         | -   |               |                                  |  |
| Subsidiary of (if applicable)                     | Genting SDC Sdn Bhd   |               |                                  |  |
| Contact Person Name                               | Mr. Arunan Kandasamy (Senior Vice F   | President – P | lantation Division)              |  |
| Website   | http://www.gentingplantations.com<br>/  | E-mail        | arunan.kandasamy@genting.<br>com |  |
| Telephone   | 03 2333 6510 (Head Office)  | Facsimile     | 03 2333 6575                     |  |
|   | 089 567 091 (Genting Tanjung Oil Mill)  |               |                                  |  |

| 1.2 Certification Information      |                       |  |                    |            |  |
|------------------------------------|-----------------------|--|--------------------|------------|--|
| Certificate Number                 | Mill: MSPO 680512     |  |                    |            |  |
|                                    | Plantations: MSPO     | 692777   |                    |            |  |
| Issue Date                         | 09.08.2018            |  | Expiry date        | 08.08.2023 |  |
| Scope of Certification             | Mill: Production of S | Sustainable Pal                                | m Oil and Palm Oil | Products   |  |
|                                    | Estate: Production    | of Sustainable                                 | Oil Palm Fruits    |            |  |
| Stage 1 Date                       |                       | N/A (The certification unit is RSPO certified) |                    |            |  |
| Stage 2 / Initial Assessm<br>(IAV) | 20-21 and 24          | /11/2017                                       |                    |            |  |
| Continuous Assessment              | Visit Date (CAV) 1    | 21-24/11/201                                   | 18                 |            |  |
| Continuous Assessment              | 11-14/11/201          | 19   |                    |            |  |
| Continuous Assessment              | N/A                   |  |                    |            |  |
| Continuous Assessment              | N/A                   |  |                    |            |  |



| Other Certifications         |                  |                                   |             |  |  |
|------------------------------|------------------|-----------------------------------|-------------|--|--|
| Certificate<br>Number        | Standard(s)      | Certificate Issued by             | Expiry Date |  |  |
| EU-ISCC-CERT-<br>DE-60183796 | ISCC             | ASG CERT                          | 12/01/2019  |  |  |
| SR 0595                      | MS 1722:2011     | SIRIM QAS International Sdn. Bhd. | 24/02/2020  |  |  |
| SR 0594                      | OHSAS 18001:2007 | SIRIM QAS International Sdn. Bhd. | 24/02/2020  |  |  |
| EMS 00561                    | ISO 14001:2015   | SIRIM QAS International Sdn. Bhd. | 09/04/2020  |  |  |
| RSPO 652320                  | RSPO             | BSI Services (M) Sdn.<br>Bhd.     | 10/01/2022  |  |  |

| 1.3 Location of Certification Unit                               |   |                  |                    |  |  |  |
|--|---|------------------|--------------------|--|--|--|
| Name of the Certification Unit                                   | Site Address  | GPS Reference    | of the site office |  |  |  |
| (Palm Oil Mill/ Estate/ Smallholder/<br>Independent Smallholder) |   | Longitude        | Latitude           |  |  |  |
| Genting Tanjung Oil Mill   | Mile 97, Sandakan-Lahad Datu<br>Road, Tenegang, Jalan Jeroco,<br>90200 Kinabatangan, Sabah,<br>Malaysia | 118° 16′ 23.9″ E | 5° 25′ 22.8″ N     |  |  |  |
| Genting Tanjung Estate   | Mile 97, Sandakan-Lahad Datu<br>Road, Tenegang, Jalan Jeroco,<br>90200 Kinabatangan, Sabah,<br>Malaysia | 118° 16′ 23.9″ E | 5° 25′ 22.8″ N     |  |  |  |
| Genting Tenegang Estate  | Mile 97, Sandakan-Lahad Datu<br>Road, Tenegang, Jalan Jeroco,<br>90200 Kinabatangan, Sabah,<br>Malaysia | 118° 13′ 32.2″ E | 5° 20′ 46.02″ N    |  |  |  |
| Genting Landworthy Estate  | Mile 97, Sandakan-Lahad Datu<br>Road, Tenegang, Jalan Jeroco,<br>90200 Kinabatangan, Sabah,<br>Malaysia | 118° 18′ 24.6″ E | 5° 25′ 13.4″ N     |  |  |  |
| Genting Layang Estate  | Mile 97, Sandakan-Lahad Datu<br>Road, Tenegang, Jalan Jeroco,<br>90200 Kinabatangan, Sabah,<br>Malaysia | 118° 14′ 3.35″ E | 5° 25′ 21.9″ N     |  |  |  |
| Genting Bahagia Estate   | Mile 97, Sandakan-Lahad Datu<br>Road, Tenegang, Jalan Jeroco,<br>90200 Kinabatangan, Sabah,<br>Malaysia | 118° 16′ 33.7″ E | 5° 21′ 49.5″ N     |  |  |  |



| 1.4 Plantings & Cycle           |         |        |                  |         |         |
|---------------------------------|---------|--------|------------------|---------|---------|
| Estate                          |         |        | Age (Years) - ha | 1       |         |
| Estate                          | 0 - 3   | 4 - 10 | 11 - 20          | 21 - 25 | 26 - 30 |
| Genting Tanjung<br>(3973.66)    | 1049.06 | 272.90 | 198.28           | 0       | 2453.42 |
| Genting Tenegang<br>(3434.89)   | 779.50  | 0      | 600.92           | 0       | 2054.47 |
| Genting Landworthy<br>(3706.61) | 0       | 0      | 0                | 3706.61 | 0       |
| Genting Layang<br>(1817.8)      | 0       | 267.08 | 1366.86          | 183.86  | 0       |
| Genting Bahagia<br>(4029.42)    | 669.38  | 0      | 0                | 0       | 3360.04 |
| Total                           | 2497.94 | 539.98 | 2166.06          | 3890.47 | 7867.93 |

| 1.5 FFB Production (Actual) and Projected (tonnage) |   |  |   |  |  |  |
|---|---|--|---|--|--|--|
| Producer Group                                      | Projected from last<br>audit<br>(Nov 2018 – Oct 2019) | Actual production<br>(Nov 2018 – Oct 2019) | Projected production for<br>next 12 months<br>(Nov 2019 – Oct 2020) |  |  |  |
| Genting Tanjung<br>Estate                           | 69,024.00   | 64,685.87                                  | 65,552.00   |  |  |  |
| Genting Bahagia<br>Estate                           | 68,767.00   | 73,366.43                                  | 61,657.00   |  |  |  |
| Genting<br>Landworthy Estate                        | 82,515.00   | 79,992.62                                  | 73,658.00   |  |  |  |
| Genting Layang<br>Estate                            | 35,236.00   | 38,110.56                                  | 39,436.00   |  |  |  |
| Genting Tenegang<br>Estate                          | 59,088.00   | 59,328.45                                  | 50,999.00   |  |  |  |
| Total   | 314,630.00  | 315,483.93*                                | 291,302.00  |  |  |  |

<sup>\*</sup>High productions due to high crops

| 1.6 Certified CPO / PK Tonnage  |                   |                   |                   |  |  |
|---|-------------------|-------------------|-------------------|--|--|
| Estimated   Actual   Forecast   (Nov 2018 – Oct 2019)   (Nov 2018 – Oct 2019)   (Nov 2019 – Oct 2020) |                   |                   |                   |  |  |
|   | CPO (OER: 21.06%) | CPO (OER: 20.63%) | CPO (OER: 21.18%) |  |  |
| 60 MT/hr  | 66,261.08mt       | 65,084.33mt       | 61,697.76mt       |  |  |
|   | PK (KER: 5.37%)   | PK (KER: 5.05%)   | PK (KER: 5.30%)   |  |  |



| 16,895.63mt | 15,931.94mt | 15,439.01mt |
|-------------|-------------|-------------|
|             |             |             |

| 1.7 Certified Area |   |             |                                   |                    |                 |  |  |
|--------------------|---|-------------|-----------------------------------|--------------------|-----------------|--|--|
| Estate             | Total Planted<br>(Mature +<br>Immature)<br>(ha) | HCV<br>(ha) | Infrastructure<br>& Other<br>(ha) | Total Area<br>(ha) | % of<br>Planted |  |  |
| Genting Tanjung    | 3,973.66  | 234.96      | 257.65                            | 4,466.27           | 89              |  |  |
| Genting Tenegang   | 3,434.89  | 29.75       | 187.9                             | 3,652.54           | 94              |  |  |
| Genting Landworthy | 3,706.61  | 9.87        | 322.52                            | 4,039.00           | 92              |  |  |
| Genting Layang     | 1,817.80  | 179.92      | 79.69                             | 2,077.41           | 88              |  |  |
| Genting Bahagia    | 4,029.42  | 44.54       | 353.08                            | 4,427.04           | 91              |  |  |
| TOTAL              | 16,962.38                                       | 499.04      | 1,200.84                          | 18,662.26          | 91              |  |  |

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

BSI Services Malaysia Sdn Bhd has conducted the 2<sup>nd</sup> Annual Surveillance (ASA2) Certification Assessment of Genting Tanjung Palm Oil Mill and Supply Base, located in Lahad Datu, Sabah comprising One (1) Palm Oil Mill and Five (5) Estates 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 - Part 2\_EDITED VERSION (100114).

The onsite assessment was conducted on  $11 - \frac{14}{11}/2019$ 

Based on the assessment result, Genting Tanjung 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 MSPO Guidance - Part 2\_EDITED VERSION (100114) and recommended for certification.



#### **Section 2: Assessment Process**

#### **Certification Body:**

BSI Services Malaysia Sdn Bhd, Suite 29.01 Level 29 The Gardens North Tower, Lingkaran Syed Putra, Mid Valley City, 59200 Kuala Lumpur Tel +60392129638 Fax +60392129639 Nicholas Cheong: Nicholas.Cheong@bsigroup.com

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

#### **Assessment Methodology, Programme, Site Visits**

This on-site assessment was conducted from 11 - 14/11/2019. The audit programme is included as Appendix A. The approach to the audit was to treat the Genting Tanjung Palm Oil Mill and Supply Base as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, 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 Part 3: General principles for oil palm plantations and organized smallholder and MS 2530-4:2013 Part 4: General principles for palm oil mills 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  $S = r\sqrt{n}$  where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement.

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.

All the previous nonconformities are remains closed. The assessment findings for the initial 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.

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

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

| 1. Assessment Program                               |                           |                   |                   |                   |                   |
|---|---------------------------|-------------------|-------------------|-------------------|-------------------|
| Name<br>(Mill / Plantation /<br>Group smallholders) | Year 1<br>(Certification) | Year 2<br>(ASA 1) | Year 3<br>(ASA 2) | Year 4<br>(ASA 3) | Year 5<br>(ASA 4) |
| Genting Tanjung Palm<br>Oil Mill                    | Х                         | X                 | X                 | X                 | X                 |
| Genting Tanjung Estate                              |                           | Χ                 |                   | Х                 | Х                 |
| Genting Tenegang Estate                             |                           | Χ                 | Х                 |                   | Х                 |
| Genting Layang Estate                               | X                         |                   | Х                 | Х                 |                   |
| Genting Bahagia Estate                              | X                         |                   | Х                 |                   | X                 |
| Genting Landworthy<br>Estate                        | Х                         | Х                 |                   | Х                 |                   |

Tentative Date of Next Visit: November 9, 2020 - November 12, 2020

**Total No. of Mandays: 8 Mandays** 

**BSI Assessment Team:** 

#### Muhammad Fadzli Masran - Lead Assessor

He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. Fluent in Bahasa Malaysia and English Language. During this assessment, he assessed on the aspects of mill and estate best practices, waste management, HCV, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.

#### **Mohamad Razin Bakal - Team Member**

Graduate in Degree of Accountancy with University Putra Malaysia. Having 17 years of working experience in various field in Malaysia, Africa and Indonesia. Have enough knowledge and experiences in oil palm estate operation inclusive of estate administrative, budget preparation, jungle clearing, new planting, nursery establishment and management, harvesting, field upkeep and maintenance, safety and health, vehicle running and skills in Good Agricultural Practices





(GAP) including Integrated Pest Management (IPM). Involved in MSPO auditing since 2018. Qualified as Lead Auditor/Auditor for MSPO 2530:2013, ISO 14001:2015 and ISO 9001:2015 from Sirim Berhad. Member of BSI MSPO audit team. Able to speak and understand Bahasa Malaysia and English. During this assessment, he assessed on the aspects of Mill best practices, Estate best practices, workers welfare, stakeholder consultation, social, long-term economic viability.

**Accompanying Persons: NA** 



#### **Section 3: Assessment Findings**

#### 3.1 Details of audit results

This assessment has be 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

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

The nonconformity is listed below.

During the Certification Assessment there were one (1) Major & two (2) Minor nonconformities raised. The Genting Tanjung Palm Oil Mill and Supply Base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

| Major Nonconformities:      |   |                             |  |  |  |
|-----------------------------|---|-----------------------------|--|--|--|
| Ref                         | Area/Process  | Clause                      |  |  |  |
| 1842984-201911-M1           | Palm Oil Mill   | 4.5.3.2 - Part 4            |  |  |  |
| Requirements:               | A waste management plan to avoid or reduce implemented. The waste management plan should a) Identifying and monitoring sources of waste a   | uld include measures for:   |  |  |  |
| Statement of Nonconformity: | Waste management plan was not effectively imp   | plemented                   |  |  |  |
| Objective Evidence:         | During the site visit to workshop (Spare part store) on 14th November 2019, it was found that,  1. Used oil spillage on the floor  2. Used oil storage is not as per Waste Management Plan established documented in Identification, Segregation and Storage of waste dated 26/10/2019. |                             |  |  |  |
| Corrections:                | Corrections:  1. All spillage will be cleaned up immediately and all drums that stored the use of will be transferred immediately to the Scheduled Waste store. Strictly no use oil will be stored in the Lubricant Store, but must be immediately stored in the Schedule Waste Store.  |                             |  |  |  |
|                             | 2. Conduct training to the PIC Store and Works as per documented procedure in the Identification, Segregation and Storage of W  | Mill Waste Management Plan, |  |  |  |
| Root cause analysis:        | The training and briefing on waste management effective because the worker did not immediately  |                             |  |  |  |



|                        | transferring the used oil into the drum and the drum that store the used oil is also did not transfer immediately to the Schedule Waste Store.   |  |  |
|------------------------|--|--|--|
| Corrective Actions:    | Renovation to the Lubricant store will commence to improve the store floor condition for better spillage management.   |  |  |
|                        | Training for PIC Store and Workshop on Waste Management Plan will be conducted every 6 month and will be included in the Mill OSH Training Plan for 2020 as a monitoring plan and will be further check during the next MSPO Internal Audit. |  |  |
| Assessment Conclusion: | Evidence submitted:  |  |  |
|                        | <ol> <li>Picture of cleaned use oil spillage in the lubricant store and used oil drum stored in the schedule waste store.</li> <li>Training record for the PIC store and workshop on waste management plan.</li> </ol>                       |  |  |
|                        | 3. The Mill OSH Training Plan for 2020.  |  |  |
|                        | Major NC closed on 13/12/2019  |  |  |
|                        | The effectiveness of the CAP implementation will be verified in the next surveillance assessment.  |  |  |

| Minor Nonconformities:  |   |   |  |  |
|---|---|---|--|--|
| Ref   | Area/Process Clause   |   |  |  |
| 1842984-201911-N1   | Plantations 4.4.4.2 - Part 3  |   |  |  |
| Requirements:   | · · · · · · · · · · · · · · · · · · ·   | The occupational safety and health plan shall cover the following: b) The risks of all operations shall be assessed and documented. |  |  |
| Statement of Nonconformity:   | The OSH plan was not effectively implemented.  i. HIRARC was not reviewed for accident cases occurred.  ii. First aid case investigation process was not adequately addressed according to internal procedure requirements.   |   |  |  |
| Objective Evidence:   | GTGE No HIRARC review for 4 accident cases (minor accident) occur in the month of June and 1 case (major accident) occur in July 2019.  GBGE  |   |  |  |
|   | No HIRARC review for 2 accident cases (minor accident) occur in the month of March and August 2019. No investigation conducted for 4 accident cases (minor accident) in GTGE and 2 accident cases (minor accident) in GBGE.   |   |  |  |
| Corrections:  | SHO will conduct a briefing and training to GTGE and GBGE management regarding Guideline for HIRARC and conduct HIRARC review based on all accident reported by the estate for 2019.  SHO will conduct a briefing and training session to GTGE's HA and GBGE's HA regarding the company's OSH Manual procedure.                       |   |  |  |
| Investigation to all the accident cases will be conducted and report through A, Accident Investigation Report as per company's OSH Manual procedu |   |   |  |  |
| Root cause analysis:  | No HIRARC review has been done after each accident reported. This is because of inadequate knowledge and guidance on how to execute the HIRARC review, among the estate management.  The HA did not conduct the accident investigation because of their knowledge on the company's OSH Manual procedure OM-GPB-01 - Pemberitahuan Dan |   |  |  |



|                        | Penyiasatan Kemalangan Di Tempat Kerja requirement is still inadequate because no briefing or training regarding OSH Manual done to the HA.  |  |
|------------------------|--|--|
| Corrective Actions:    | SHO will produce a flow chart of procedure on how and when to review or update the HIRARC. Training and briefing on HIRARC by SHO will be implemented yearly and included in estate OSH Training Plan for 2020.                                      |  |
|                        | Briefing and Training on OSH Manual will be an annual program conducted by the SHO for all estate HA. This will be included in estate OSH Training Plan for 2020 as a monitoring plan and will be further check during the next MSPO Internal Audit. |  |
| Assessment Conclusion: | Evidence submitted:  |  |
|                        | 1.Training and briefing record done by SHO to the estate management on Guideline for HIRARC for GTGE   |  |
|                        | 2.Training and briefing record done by SHO to the estate management on Guideline for HIRARC for GBGE   |  |
|                        | 3.Reviewed HIRARC for related occupational accident for GTGE.  |  |
|                        | 4.Reviewed HIRARC for related occupational accident for GBGE.  |  |
|                        | 5.Training and Briefing record on OSH Manual to GTGE HA.   |  |
|                        | 6.Training and Briefing record on OSH Manual to GBGE HA.   |  |
|                        | 7.Borang A Accident Investigation Report for 4 minor accident cases for GTGE   |  |
|                        | 8.Borang A Accident Investigation Report for 2 minor accident cases for GBGE   |  |
|                        | 9. Flow chart of procedure on how and when to review or update the HIRARC.   |  |
|                        | 10.GTGE OSH Training Plan 2020   |  |
|                        | 11.GBGE OSH Training Plan 2020   |  |
|                        | The effectiveness of the CAP implementation will be verified in the next surveillance assessment.  |  |

| Minor Nonconformities:      |  |  |  |
|-----------------------------|--|--|--|
| Ref                         | Area/Process Clause  |  |  |
| 1842984-201911-N2           | Plantations 4.5.3.2 - Part 3   |  |  |
| Requirements:               | A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:  a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products |  |  |
| Statement of Nonconformity: | Waste management plan was not effectively implemented  |  |  |
| Objective Evidence:         | GBGE Sighted during site visit sighted the evidence of recycle waste such as paper boxes and plastic water bottle was disposed in the landfill even though the estate management has established designated place for 3R collection center. Thus, the management plan was not effectively implemented.   |  |  |



| Corrections:           | GBGE will re-conduct the training for all the workers regarding segregation of the recycle waste from domestic waste and also briefing on how to use the 3R collecting centre that already provided.  All recycle that is in the current landfill will be segregate and placed in the recycle centre.                                       |  |
|------------------------|---|--|
| Root cause analysis:   | The training on Recycle Waste Management done to all the estate workers was not effective because still some workers did not segregate the recycle waste from the domestic waste.   |  |
| Corrective Actions:    | Training program for Recycle waste management will be revised from once a year to 2 time a year which is will be conducted every 6 months. The training will be included in the Annual Training Plan for 2020 as a monitoring plan and will be further check during the next MSPO Internal Audit.   |  |
| Assessment Conclusion: | Evidence submitted:  1. Training and Briefing record for the Recycle waste management and how to use the 3R collecting centre.  2. Photo of the current landfill that cleared from Recycle Waste.  3. GBGE Annual Training Plan for 2020  The effectiveness of the CAP implementation will be verified in the next surveillance assessment. |  |

| Notarratha Paritina Communita |
|-------------------------------|
| Noteworthy Positive Comments  |
| notement in control comments  |
|                               |
|                               |

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

| Major Nonconformities:      |  |                  |  |
|-----------------------------|--|------------------|--|
| Ref                         | Area/Process   | Clause           |  |
| 1706956-201810-M1           | Plantations  | 4.3.1.1 - Part 3 |  |
| Requirements:               | All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.   |                  |  |
| Statement of Nonconformity: | Some of the compliance to legal requirements was not clearly demonstrated.   |                  |  |
| Objective Evidence:         | 1) Medical surveillance already been sent to Klinik Elopura Sdn Bhd. Inspection by Dr Shaji A/L Pratap Gopal (HQ/12/DOC/00/259) with total 48 Sprayer, 2 Mandore, 3 workshop, 2 Storekeeper, and 1 Genset operator. However, found Tanjung Estate did not send manuring operators for Biological Monitoring to OHD as per recommendation in CHRA Report (dated 2014).  2) Found Chemical Exposure Monitoring was not conducted by Tanjung, Landworthy and Tenegang estates for Manuring (crystalline silica, Quartz) as per recommendation by CHRA report (dated 2014).  3) At Tanjung Estate, it was found that chemicals kencis, Muhiron, Farmtrobin 250 in chemical register (30 August 2018) were not included in CHRA report [dated September 2014 done by Noormahani Harun and Zarul Akmar (JKKP HIE 127/171-2(154)/JKKP IH 127/171-2(236)]. |                  |  |



|                        | 4) It was found that Landworthy and Tenegang estates did not notify the DOE regarding the utilization of generator sets as per Clean Air Regulation 2014 Section 5 (Obligation to notify) (1) An owner or occupier of a premises shall not, without giving prior written notification to the director general carry out any work on any premises that may result in source of emission.  |
|------------------------|--|
| Corrections:           | <ol> <li>All the manuring workers to be sent for medical check up by OHD (by 18th Jan 2019).</li> <li>To conduct Chemical Exposure Monitoring through appointed consultant (by 18th Jan 2019).</li> </ol>  |
|                        | <ul><li>3. The new chemicals to be included in the next CHRA assessment in Mac 2019.</li><li>4. To notify DOE on the utilization of the generator sets.</li></ul>  |
| Root cause analysis:   | <ol> <li>Miscommunication &amp; misunderstanding on the requirement of medical surveillance for Manuring workers that the exercise can be conducted by the estate HA (Hospital Assistant).</li> <li>Failure to check and follow up on the recommendation in CHRA - to conduct Chemical Exposure Monitoring.</li> </ol>   |
|                        | 3. The chemicals were initially intended for trial purpose in early 2018. Therefore, management decided to include it in the next CHRA which is due in 1-year period (Mac 2019).  4. Inadequate knowledge on the requirement in Clean Air Regulation 2014.   |
| Corrective Actions:    | 1. Workers will be sent for medical surveillance as per recommendation in CHRA report. This to be followed up and verified by OSH officer.  2. Recommendations set out in CHRA report will be complied accordingly. This to be followed up and verified by OSH officer.  3. To conduct Supplementary CHRA whenever new chemicals are approved (by GPRC) for wide application, as stated in the OSH Procedure OM-GPB-10.  |
|                        | GM to send memo to Estate Managers to inform OSH officer immediately whenever new chemicals are approved. Then OSH officer shall arrange for the supplementary CHRA conducted soonest possible.  4. LRR (Legal Requirement Register) will be updated and complied.   |
|                        | All above legal compliances will be checked during periodic OSH and Sustainability Internal Audit and follow up visit.   |
| Assessment Conclusion: | Evidence submitted: 1) List of 37 manuring workers from Genting Tanjung Estate whom have been sent to a private clinic for medical surveillance and a sample of medical report. The check-up was conducted on 16/1/2019. 2) An appointment letter from Genting Plantations' Vice President-Plantation (Sabah Region 2) dated 5/3/2019 [ref.: GPOS/VPGM/019/2K19] to a company to conduct the chemical exposure monitoring (CEM) for three estates. The CEM is expected to be conducted on 25/3/2019. 3) A letter of confirmation dated 14/1/2019 from an awarded consultant to conduct the CHRA. Based on the letter, the assessment is expected to commence on 25/3/2019 and report is expected to be ready in July 2019. |
|                        | 4) An appointment letter from Genting Landworthy Estate's Sr. Estate Manager dated 19/3/2019 [ref.: GLWE/VMS/19/071] to a company to prepare all the prerequisites of notification to DOE with regards to possession of 2 units of generator   |
|                        | set. The evidence submitted was found to be sufficient. Nonetheless, the   |



|                          | effectiveness of implementation of corrective action plan shall be verified in the next assessment. Thus, the major NCR is closed on 25/3/2019.   |
|--------------------------|---|
| Assessment Verification: | Verified the training records during the assessment:  2. Sighted Summary of Occupational Medical Surveillance Check up dated on 28 <sup>th</sup> February 2019 for following estate workers:  i.Sprayer – 43 persons  ii.Storekeeper – 2 persons  iii.Genset Operator – 1 person  iv.Workshop – 2 persons  v.Manuring – 36 persons  3. Sighted Initial Chemical Exposure monitoring Report for Genting Tenegang Estate, Monitoring Report (Ref No: HQ18/JHI/00016 – 2019/012) conducted by Chemclass Sdn. Bhd. Dated on 23 <sup>rd</sup> June – 31 <sup>st</sup> July 2019  Sighted Initial Chemical Exposure monitoring Report for Genting Landworthy Estate, Monitoring Report (Ref No: HQ18/JHI/00016 – 2019/011) conducted by Chemclass Sdn. Bhd. Dated on 23 <sup>rd</sup> June – 31 <sup>st</sup> July 2019  Sighted Initial Chemical Exposure monitoring Report for Genting Tanjung Estate, Monitoring Report (Ref No: HQ18/JHI/00016 – 2019/010) conducted by Chemclass Sdn. Bhd. Dated on 23 <sup>rd</sup> June – 31 <sup>st</sup> July 2019 |
|                          | <ol> <li>Supplementary CHRA assessment has been conduct on March 2019 for the new chemical. Management of Genting Tanjung Estate still waiting to get result from the appointed consultant.</li> <li>Sighted letter from Department of Environment (DOE) to Pengarah Urusan Landworty Sdn. Bhd dated on 17 July 2019 Regarding of "PERAKUAN PEMBERITAHUAN BERTULIS DI BAWAH PERATURAN 5, PERATURAN – PERATURAN KUALITI ALAM SEKELILING (UDARA BERSIH) 2014. PEMBERITAHUAN MENGENAI PEMASANGAN BARU DUA (2) UNIT JANAKUASA BAGI GENTING LANDWORTH ESTATE (DIV 16) DI KM 31, OFF JALAN JEROCO KM 20, KINABATANGAN, SABAH.</li> <li>For Genting Tenegang estate, the budget to compliance with DOE Requriement has been approved by the Genting Plantation Berhad top management. The estate management in the process to call up the respective team to provide layout and</li> </ol>   |

| Major Nonconformities:      |  |                                  |
|-----------------------------|--|----------------------------------|
| Ref                         | Area/Process Clause  |                                  |
| 1706956-201810-M2           | Plantations 4.4.5.3 - Part 3   |                                  |
| Requirements:               | 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. |                                  |
| Statement of Nonconformity: | The rate/day paid to some workers for public h<br>Wages Order 2016.  | noliday did not meet the Minimum |
| Objective Evidence:         | Based on pay slips for the month of May, Jul<br>Tenegang estates, the payment for public hol   |                                  |



|                          | _   | 2016 for some workers i.e. checkers and drivers. They were paid RM18/day respectively, instead of RM35.38/day.         |  |
|--------------------------|---|--|--|
| Corrections:             | - All the affected workers to be topped up in their next salary - Nov 2018.   |  |  |
| CONTROL CONTROL          | - GENPIT to amend the system to pay according to the minimum wage for PH, SL & AL.  |  |  |
| Root cause analysis:     | The driver, checkers and mandores 'base rate' for normal days are set lower than RM 35.38 due to their commissions per mt FFB.  |  |  |
|                          |   | formula was wrongly applied for PH too.  |  |
| Corrective Actions:      | 1. Sustainability Dept to follow up and ensure GENPIT change the logic of PH, SL  |  |  |
|                          | & AL to be based on 'at least' minimum wage. While waiting for the changes  |  |  |
|                          | by GENPIT, OU   | Is to ensure PH, SL & AL are to be paid (manually) based on  |  |
|                          | the current mir   | nimum wage. This to be verified by Sustainability Dept every   |  |
|                          | month.  |  |  |
|                          |   | inability Internal Audit on workers' pay and conditions.   |  |
| Assessment Conclusion:   | Evidence submitted:  1) An approval notification from Genting Plantations' Vice President-Plantation (Sabah Region 2) to Genting Tanjung and Genting Tenegang estate to reimburse the underpaid wages for the affected workers. The payslips showing the reimbursement have been made were also submitted to the audit team.  2) A screenshot of Lintramax system to show that the wage for public holiday has been corrected by the person in-charge.  The evidence submitted was found to be sufficient. Nonetheless, the effectiveness of implementation of corrective action plan shall be verified in the next assessment. Thus, the major NCR is closed on 25/3/2019. |  |  |
| Assessment Verification: |   | ining records during the audit assessment:   |  |
|                          | Sighted momo from Genting Tenegang estate for top up the shortage of wages from January – November 2018 with total worker as follow;  |  |  |
|                          | MONTH   | NO OF WORKES   |  |
|                          | January   | 39   |  |
| February                 |   | 47   |  |
|                          | March   | 71   |  |
|                          | June  | 23   |  |
|                          | August  | 24   |  |
|                          | September   | 23   |  |
|                          | October   | 29   |  |
|                          | November  | 20   |  |
|                          | Total   | 276  |  |
|                          | Sighted the Pay   | yslip for following workers :  |  |
|                          |   | - Underpaid Holiday for month Janaury 2018 RM 18.38 (top up) to<br>m wages of RM 35.38. Orginal rate paid was RM 17.00 |  |



| 2. ID E10222 – Underpaid Holiday for month February 2018 RM 17.38 (top up) to get miminum wages of RM 35.38. Orignal rate paid was RM 18.00 |
|---|
| 3. ID E11208 – Underpaid Holiday for month March 2018 RM 5.38 (top up) to get   |
| miminum wages of RM 35.38. Orignal rate paid was RM 30.00   |

| Major Nonconformities:      |   |   |  |  |  |  |  |  |
|-----------------------------|---|---|--|--|--|--|--|--|
| Ref                         | Area/Process  | Clause  |  |  |  |  |  |  |
| 1706956-201810-M3           | Palm Oil Mill   | 4.3.1.1 - Part 4  |  |  |  |  |  |  |
| Requirements:               | All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.  |   |  |  |  |  |  |  |
| Statement of Nonconformity: | Some of the compliance to legal requirements was not clearly demonstrated.  |   |  |  |  |  |  |  |
| Objective Evidence:         | 1) It was found that 2 sampled employees (E00 overtime more than the permitted limit (08/KBN/2018-068)] i.e. 120 hours/month, for the 2018.   | [ref.: permit #600-1/2/13/78  |  |  |  |  |  |  |
|                             | 2) Found Tanjung Oil Mill operation not dispose s<br>Scheduled waste Reg 2005 example burn contam<br>kit) as fire starter for Boiler.   |   |  |  |  |  |  |  |
| Corrections:                | 1) - To ensure OT do not exceed 104 hours/month by monitoring their OT on weekly basis.     - To obtain workers consent letter and acknowledgement before work exceeding 104 hours.     2) Immediately collect all contaminated shredded empty bunch from all Spill   |   |  |  |  |  |  |  |
| Root cause analysis:        | Kit and include it in the monthly inventory eSWIS.  (1) - Over time (OT) exceeded 120 hours due to longer working hours caused by boiler overhaul (in August 2018), peak crop (in October 2018) and overhead electrical problems (in July 2018).  (2) - Inadequate understanding on the detail of the legal requirement Sch. Waste Regulation.  - Handling of contaminated spill kit waste not covered in Sch. Waste procedure. |   |  |  |  |  |  |  |
| Corrective Actions:         | <ul> <li>(1) - Weekly monitoring of OT to ensure total where to include "Permit Kerja Lebih Masa" into Morwe do not miss out the monitoring and action tall (2) - Amend Sch. Waste procedure to include SW408.</li> <li>- Training on the amended Sch. Waste procedure To check all the effectiveness during the Sustaina months.</li> </ul>  | nole month not exceed 120 hours. nitoring and Measurement so that ken if not comply.  the contaminated spill kit waste e and SW Regulation. |  |  |  |  |  |  |
| Assessment Conclusion:      | Evidence submitted: 1) Genting Tanjung POM's "Overtime Monitoring overtime work done by workers are monitored permitted amount. A letter from the Sr. Mill Mananot to do overtime work more than the regulated  | I and ensured not exceeding the ager to the workers notifying them  |  |  |  |  |  |  |



|                          | 2) eSwis Inventory Record (5th Schedule) showing that SW408 has been included in the inventory on 27/11/2018 and training records dated 27/11/2018 on handling of SW408.  |
|--------------------------|---|
|                          | The evidence submitted was found to be sufficient. Nonetheless, the effectiveness of implementation of corrective action plan shall be verified in the next assessment. Thus, the major NCR is closed on 25/3/2019.   |
| Assessment Verification: | Verified the training records during the assessment:  |
|                          | <ol> <li>Overtime Monitoring Record maintained by Genting Tanjung Oil Mill (GTOM).         The prepared on weekly basic by the Mill Management to monitor the Overtime Time (OT) perform by worker is not exceeding the hour allow by Jabatan Tenaga Kerja (JTK)     </li> <li>Sighted eSwis Inventory Record (5th Schedule) and Schedule Waste Inventory for month of November 2018 which included SW 408. The balance recorded in the inventory record is 0.0030MT</li> </ol> |

#### 3.4 Issues Raised by Stakeholders

| IS# | Description  |
|-----|--|
| 1   | Issues:  |
|     | FFB Supplier: They informed that they were signed on the contract agreement prior the services and understood the terms and conditions. Payment was made promptly according to the agreement. They maintained a good relationship with the management. |
|     | Management Responses:  |
|     | The management will continue to maintain good relationship with the contractors and make payment promptly.   |
|     | Audit Team Findings:   |
|     | Verified the records of payment found that the management was made payment according to terms stated in the agreement.   |

#### 3.5 Summary of the Nonconformities and Status

| CAR Ref.          | CLASS | ISSUED     | STATUS            |
|-------------------|-------|------------|-------------------|
| 1706956-201810-M1 | Major | 20/11/2019 | Closed 25/3/2019  |
| 1706956-201810-M2 | Major | 20/11/2019 | Closed 25/3/2019  |
| 1706956-201810-M3 | Major | 20/11/2019 | Closed 25/3/2019  |
| 1842984-201911-M1 | Major | 14/11/2019 | Closed 13/12/2019 |
| 1842984-201911-N1 | Minor | 14/11/2019 | Open              |
| 1842984-201911-N2 | Minor | 14/11/2019 | Open              |



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

#### MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder

| Criterio  | n / Indicator   | Assessment Findings   | Compliance |  |  |  |  |  |
|-----------|---|---|------------|--|--|--|--|--|
| 4.1 Princ | 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 -   | Genting Plantation Berhad has established MSPO Policy, dated 03 <sup>rd</sup> August 2009. The Policy has signed by the Mr. Yong Chee Kong, President & Chief Operating Officer dated on 03 <sup>rd</sup> August 2009.  | Complied   |  |  |  |  |  |
|           |   | The policy was communicated by displayed at the strategic location, induction & training, memo and meeting in all estates.  |            |  |  |  |  |  |
| 4.1.1.2   | The policy shall also emphasize commitment to continual improvement.  | emphasize on the commitment to continual improvement with the   | Complied   |  |  |  |  |  |
|           | - Major compliance -  | objective of improving the estate operation cover in Safety, Social and environment.  |            |  |  |  |  |  |
| 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 - | Genting Plantation Berhad has established Sustainability Management Procedure Manual. Sighted SOP No: SMP-GPB-03 titled "Sustainable Internal Audit" dated 25-05-2018. Issue Date: 25 May 2018. The objective SOP is to Plan and Implement internal audit to determine conformance to the applicable sustainability standard's requirement of MSPO and to identify opportunities for further improvement. | Complied   |  |  |  |  |  |



| Criterio | n / Indicator   | Assessment Findings  | Compliance |
|----------|---|--|------------|
|          |   | According to clause 6.0 - Procedure Details, all operating units are to be audited at a frequency of not less than once a year and frequent of the audits is based on the performance of the respective OU's during the past audit.  |            |
|          |   | Annual Sustainable Internal Audit was carried out from 18 <sup>th</sup> to 19 <sup>th</sup> September 2019 at Genting Tenegang Estate (GTGE), 25 <sup>th</sup> October 2019 at Genting Bahagia Estate (GBGE) (GBGE) and 22 <sup>nd</sup> October 2019 at Genting Layang Estate (GLYE).   |            |
|          |   | The strong and week points have been address for following scope covering;   |            |
|          |   | A. Documentation in estate   |            |
|          |   | B. Interview Session with internal stakeholder   |            |
|          |   | C. Site Visit at estate  |            |
| 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 - | Internal audit procedure SOP No: SMP-GPB-03 titled "Sustainable Internal Audit" dated 25-05-2018. Issue Date: 25 May 2018 was established and effectively implemented. The procedure was reviewed by the management to include the competency and responsibility requirement for MSPO internal auditor.  | Complied   |
|          | Tage: compitation   | The internal audit covers effectively as required by the standard such as, documentation, interview session with internal stakeholder and site visit. Aside, also seen email correspondence between the estates and sustainability team in closing the findings with objective evidences. Sample of finding and corrective actions taken by the estates management as tabulated below; |            |



| Criterion / Indicator |  | Assessment Findings   |                      | Compliance |
|-----------------------|--|---|----------------------|------------|
|                       | A. Finding for Genting Tenegang Estate as per tabulated below; |   |                      |            |
|                       | No   | Non Compliance  | Status               |            |
|                       |  | 4.4.2 – Major  No Accident and emergency Procedure established for the contractor workshop in Div 12  - No Spillage Management - No first aid kit - No Safety Signages - No Storages management for | Closed on 04.11.2019 |            |
|                       |  | all the equipment  5.3.1 – Major  Site visit to the landfill area Div. 9 sighted that domestic and recycle waste found not segregated.  | Closed on 04.11.2019 |            |
|                       |  | 5.6.2 – Major<br>HCV Management Plan not updated to<br>2019   | Closed on 04.11.2019 |            |
|                       |  | 5.1.3 – Minor   | Closed on 04.11.2019 |            |



| Criterion / Indicator |        | Assessment Findings   | ;                       | Compliance |
|-----------------------|--------|---|-------------------------|------------|
|                       |        | Environmental Management & Improvement plan. Record is sighted and updated as at 28.08.2019. Estate to review back point no. 8 regarding the peat soil as estate has declare no peat soil |                         |            |
|                       |        | 5.6.2 – Minor  Training on HCV and Rpiarian Buffer zone. Training report sighted done on 06.07.2019 and 09.07.2019 but not cover all chemical handler from all div. No workers for div 9  | Closed on 04.11.2019    |            |
|                       |        | 5.3.3 – Minor Rubbish collection schedule sighted. Recycle waste sold receipt sighted 12.09.2019. No inventory done by the estate for recycle waste                                       | Closed on 04.11.2019    |            |
|                       | B. Fir | nding for Genting Bahagia Estate (GBGE)   | as per tabulated below; |            |
|                       | No     | Non Compliance  | Status                  |            |
|                       |        | 4.4.2 – Major   | Closed on 30.10.2019    |            |



| Criterio  | on / Indicator  | Assessment Findings  | Compliance |
|-----------|---|--|------------|
|           |   | Flashback arrestor is not available for both Acetyl and Oxygen Tank in the Workshop  |            |
|           |   | 4.7.5 – Major  The air compressor SB/PMT?10350, pressure gauge is damage and need to be replace  Closed on 30.10.2019  |            |
|           |   | Based on documentation check, all estates managed to close all finding raised by the Internal Audit within the agreeable time frame.   |            |
| 4.1.2.3   | Report shall be made available to the management for their review.  - Major compliance -  | Annual Sustainable Internal Audit was carried out from 18 <sup>th</sup> to 19 <sup>th</sup> September 2019 at Genting Tenegang Estate (GTGE), 25 <sup>th</sup> October 2019 at Genting Bahagia Estate (GBGE) and 22 <sup>nd</sup> October 2019 at Genting Layang Estate (GLYE). The outcome from the Internal Audit assessment is available and has been discussed in the RSPO and MSPO 3 <sup>rd</sup> Management Review Meeting Minute dated on 31 <sup>st</sup> October 2019  |            |
| Criterion | <b>1 4.1.3</b> – 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 - | Annual Sustainable Internal Audit was carried out from 18 <sup>th</sup> to 19 <sup>th</sup> September 2019 at Genting Tenegang Estate (GTGE), 25 <sup>th</sup> October 2019 at Genting Bahagia Estate (GBGE) and 22 <sup>nd</sup> October 2019 at Genting Layang Estate (GLYE). The outcome from the Internal Audit assessment is available and has been discussed in the RSPO and MSPO 3 <sup>rd</sup> Management Review Meeting Minute dated on 31 <sup>st</sup> October 2019. | ,          |



| Criterion / Indicator                   |   |   | Assessment Findings                               |                |  |
|---|---|---|---|----------------|--|
| Criterion 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. | deration of the main social and environmental impact and of the main social and environmental impact. The plan for respective |   |                |  |
|   | - Major compliance -  | Estate  | e : Genting Tenagang Estate (GTGE)                |                |  |
|   |   | No  | Continues Improvement Plan Activity               | Time<br>Target |  |
|   |   | 1   | Minimize use of certain pesticides                | To review      |  |
|   |   | 2   | Environmental Impacts                             | annually       |  |
|   |   | 3   | Waste Reduction                                   |                |  |
|   |   | 4   | Pollution and greenhouse gas (GHG) emissions      |                |  |
|   |   | 5   | Social impacts                                    |                |  |
|   |   | 6   | Encourage optimizing the yield of the supply base |                |  |
|   |   | 7   | Worker personal file                              |                |  |
|   |   | 8   | Estate Inputs                                     |                |  |
|   |   | 9   | Water consumption and water quality               |                |  |
|   |   | 10  | Health and Safety performances                    |                |  |
|   |   | 11  | Best Practices - Mechanization                    |                |  |
| 1                                       |   | 12  | HCV   |                |  |

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| Criterion / Indicator |  | Assessment Findings  |                | Compliance |
|-----------------------|--|--|----------------|------------|
|                       | Estate : Genting Bahagia Estate (GBGE) |  |                |            |
|                       | No                                     | Continues Improvement Plan Activity  | Time<br>Target |            |
|                       | 1                                      | Minimize use of certain pesticides - monthly                                   | To review      |            |
|                       | 2                                      | Environmental Impacts – monthly / twice a month                                | annually       |            |
|                       | 3                                      | Waste Reduction – Annually   |                |            |
|                       | 4                                      | Pollution and greenhouse gas (GHG) emissions - Annually                        |                |            |
|                       | 5                                      | Social impacts - Annually  |                |            |
|                       | 6                                      | Encourage optimizing the yield of the supply base – 3 year once for replanting |                |            |
|                       | 7                                      | Worker personal file – Annually  |                |            |
|                       | 8                                      | Estate Inputs - Annually   |                |            |
|                       | 9                                      | Water consumption and water quality - monthly                                  |                |            |
|                       | 10                                     | Health and Safety performances – Annually                                      |                |            |
|                       | 11                                     | Best Practices – Mechanization – on going process                              |                |            |
|                       | 12                                     | HCV  |                |            |
|                       |  |  |                |            |



| Criterion / Indicator |   | Assessment Findings                     |  | Compliance   |          |
|-----------------------|---|---|--|--|----------|
| 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.  - Major compliance - | No  1 2 3 4 5 All e Sighte The r i. ii. | Continues Improvement Plan Activity  Upgrading labour quarters  New Labour quarters  Refurbishment Surau  Refurbishment Creche  Landscaping Creche  states have established the system improvered the evidence of implementation for sampled enew improvement practice for Genting Tenagang  Change from "Paraquat" to other alternative Glyphosate and Basta  Minimize over spraying and establish ground on the improvement condition of tractors i.e leak pollution and improve safety as well as productive in the interval of the continuous content of the c | state as below; Estate (GTGE); e chemicals i.e over state (GBGE); ing to prevent | Complied |
| 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  | imple                                   | states have carried out training and briefing amentation and improvement practice in the esta<br>ers for their awareness. Sighted record of atter  | te to staffs and   | Complied |

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| Criterion / Indicator |  | Assessment Findings  | Compliance |
|-----------------------|--|--|------------|
|                       | established Major compliance -   | materials and photographs of the training in the respective estate for reference.  |            |
| 4.2 Princ             | ciple 2: Transparency  |  |            |
| Criterion 4           | 4.2.1 – Transparency of information and documents relevant to MSF  | PO 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.  - Major compliance - | Genting Plantation Berhad has established Sustainability Management Procedure Manual. Sighted SOP No: SMP-GPB-25 titled "Procedures on Requests and Responses". Issue Date: 14 August 2014. The objective SOP is to define management responsibility to respond constructively and promptly to the information requested by the stakeholder with sufficient objective evidence.  Internal and External stakeholders may express their request verbally or by writing through any of the following channels  i. During any meeting  ii. Phone  iii. Walk in to office | Complied   |
|                       |  | iv. Letter v. Email vi. Website  |            |
|                       |  | vii. Fax All estates have maintained records of requests and responses, Land Titles rights, Safety and Health Plan, Plan and Impact Assessments  |            |

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| Criterion / Indicator |  | Assessment Findings  | Compliance |
|-----------------------|--|--|------------|
|                       |  | relating to Environmental and Social Impact, Plan for Pollution<br>Prevention , Records of Complaints and Grievances, Plan for<br>Continuous Improvement. All the documents are make available upon<br>request.  |            |
| 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 environmental or social outcomes.  - Major compliance - | The management documents which are publicly available are mentioned in Indicator 4.2.1.1. Any request of information shall be recorded in GSE's "Enquiry Register Book" (ref.: Clause 3.1.2 of the above procedure). Verification of the book showed that there has been no request made of the above mentioned subjects ever since the last assessment. | Complied   |
|                       |  | Documents listed as Publicly available are   |            |
|                       |  | 1. Company Annual Report   |            |
|                       |  | 2. Group Policies  |            |
|                       |  | 3. Reports related to environment  |            |
|                       |  | 4. MSPO external audit report  |            |
|                       |  | 5. Pollution prevention plan   |            |
|                       |  | 6. Continuous Improvement Plan   |            |
|                       |  | 7. Complaints and Grievances book and its procedure  |            |
|                       |  | 8. Negotiation and Compensation procedure  |            |
|                       |  | 9. Sexual harassment procedure   |            |
|                       |  | Documents listed as Confidential   |            |
|                       |  | 1. Estate / Mill maps and land titles  |            |

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| Criterion / Indicator |   | Assessment Findings  | Compliance |  |
|-----------------------|---|--|------------|--|
| Criterion             | 2. Any reports or information related to HCV 3. Any reports or information related to SOCIAL 4. MSPO Internal Audit All these documents were sighted in the estate office. Requests for official documents through the estate office will have to go through the Head of Sustainability Department or Head of Department for releasing any confidential or sensitive information.  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 -  | Genting Plantation Berhad has established Sustainability Management Procedure Manual. Sighted SOP No: SMP-GPB-17 titled "Procedures for Consultation and Communication". Issue Date: 23 February 2018. The objective SOP is for the effective internal and external communication of sustainability requirements and responding to communication from local communities and other affected or interested parties | Complied   |  |
|                       |   | The procedure outline the process of communication on the social policies, lodging grievances and monitoring implementation. The Standard Operating Procedure (SOP) has clearly identified mechanism for consultation and communication with the relevant stakeholders.  |            |  |
| 4.2.2.2               | A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.  - Minor compliance -   | Person in charge for consultation and communication agenda with the relevant stakeholders is available. Sighted the appointment letter for   | Complied   |  |

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| Criterion / Indicator |   | Assessment Findings   | Compliance |
|-----------------------|---|---|------------|
|                       |   | the person incharge with job description endorsed by the respective estate manager as below.  |            |
|                       |   | Appointed person in Genting Tenagang Estate (GTGE) is Anriansa Abd<br>Samad, Genting Bahagia Estate (GBGE) is Denny Ng and Genting<br>Layang Estate (GLYE) is Hagman Julian   |            |
| 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 - | Sighted update list of stakeholders for all the visited estate. The list contains numerous of stakeholders which consists of government agencies, suppliers/contractors, FFB suppliers and surrounding communities.   | Complied   |
|                       | Plajor compilance   | Minutes of meetings were available for verification. Generally, among the agenda discussed were legal compliance issues, FFB pricing mechanism, harvesting standard, safety and environmental issues, sustainability standard requirements (e.g. RSPO P&C, MSPO, ISCC) and handling of complaints/grievances mechanism.                       |            |
| Criterion             | 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).  - Major compliance -    | Genting Plantation Berhad has established Sustainability Management Procedure Manual. Sighted SOP No: SMP-GPB-09 titled "Traceability (Estate)". Issue Date: 24 August 2018. The objective SOP to ensure the handling of outgoing FFB are carried out in the proper manner to ensure traceability and to meet the sustainability requirement. | Complied   |
| 4.2.3.2               | The management shall conduct regular inspections on compliance with the established traceability system.  - Major compliance -  | Inspection on compliance with the traceability procedure is regularly checked through supply chain internal audit. The internal audit report, which was carried out together with other schemes such as RSPO and ISCC, was available for verification.  | Complied   |



| Criterion / Indicator   |  | Assessment Findings  | Compliance |
|---|--|--|------------|
| The management should identify and assign suitable employees to implement and maintain the traceability system.  - Minor compliance - |  | Person in charge to implement and maintain the traceability system is available. Sighted the appointment letter for the person incharge with job description endorsed by the respective estate manager as below.  Appointed person in Genting Tenagang Estate (GTGE) is Fonita Johannes Takang, Genting Bahagia Estate (GBGE) is Darna Binti Yohan and Genting Layang Estate (GLYE) is Gloria Balitang | Complied   |
| 4.2.3.4   | Records of sales, delivery or transportation of FFB shall be maintained.  - Major compliance -   | The records and documents related to FFB traceability such as bunch chit, weighbridge tickets and daily FFB delivery records were adequately maintained both site (estate and mill).   | Complied   |
| 4.3 Princ   | ciple 3: Compliance to legal requirements  |  |            |
| Criterion   | <b>4.3.1</b> – Regulatory requirements   |  |            |
| 4.3.1.1   | All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.  - Major compliance - | The list is fully covered the requirements that related to MSPO compliance. These documents include information on laws, enforcement bodies, main requirement, environmental aspect, standard, fine, person in charge, and legal compliance checklist.   | Complied   |
|   |  | The legal compliance lists of permits/licences available for both estates and being monitored and updated periodically by person in- charge of Legal Requirements.   |            |
|   |  | Sighted permit / licenses being monitored and updated by Genting Layang Estate (GLYE) as follows;  |            |
|   |  | <ol> <li>MPOB. No Lesen: 504759802000 expires on 30.06.2020</li> <li>Diesoline Permit. No Permit: Q 00066 expires on 16.05.2020</li> </ol>   |            |

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| Criterion / Indicator | Assessment Findings  | Compliance |
|-----------------------|--|------------|
| Criterion / Indicator | <ol> <li>Assessment Findings</li> <li>Suruhanjaya Tenaga Bekalan Elektrik: No. Siri: 36774 expires on 04.07.2020</li> <li>Air Compressor Permit. No Permit: PMT – SB/1925406, expires on 04.11.2020</li> <li>ASG CERT GmbH Trentiner Ring 30,86356, expires on 12.01.2020</li> <li>MSPO Certificate: Cert No: 692777, expires on 08.08.2023</li> <li>Hospital Dressers Certificate License. Regtration No: 02907, expires on 31.12.2019</li> <li>Practice license for Dr. Edmond Fernandez (VMO). No Siri: 4676/2018, expires on 31.12.2019</li> <li>Permit Penguntukan Radas – TMB. No Penguntukan Radas 35449/0783611-001/2018, expires on 31.12.2019</li> <li>Permit Kebenaran Pemotongan gaji untuk i. Bayaran Pemprosesan Dokumen ii. Pembelian Kerbau untuk mengangkat sawit. No. Siri: 11(0996) SDK, expires on 19.06.2021</li> <li>Lesen untuk Mengaji Pekerja Bukn pemastautin. No. Lesen:</li> </ol> | Compliance |
|                       | JTK.H>KBN.600-4/1/01261/0392. Expires on 27.03.2020 12. Permit Suruhanjaya Tenaga. No. Lesen: 2019/00662, expires on: 28.04.2020 13. Lesen Berniaga. No.Pendaftaran: 162695H, expires on: 31.12.2020 14. Lesen Kedai Barang Runcit (Ariffin bin Muhammad). No. Pendaftaran: LD/2019/870, expires on 31.12.2019 15. Lagenda Bumimas (Schedule Waste Disposal Contractor). No. License: 003440, expires on 30.04.2020 16. Sadafiat Sdn. Bhd (Schedule Waste Disposal Contractor) No:003526, expires on 30.04.2020  |            |



| Criterion / Indicator |   | Assessment Findings   | Compliance  Complied |
|-----------------------|---|---|----------------------|
|                       |   | Genting Plantation Berhad has established Sustainability Management Procedure Manual. Sighted SOP No: SMP-GPB-22 titled "Legal Requirement Register (LRR)". Issue Date: 19th April 2019.  All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. The list all laws applicable to their operations in a legal requirements register is available and up todate. |                      |
| 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.                           | Tracking system available to identify changes in the relevant   | Complied             |
|                       | - Major compliance -  | On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Tracking system on any changes in the law been well implemented   |                      |
| 4.3.1.4               | The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.  - Minor compliance - | Person in charge to monitor compliance and to track and update the changes in regulatory requirements is available. Sighted the appointment letter for the person incharge with job description endorsed by the respective estate manager as below.   | Complied             |
|                       | - Minor compilance -  | Appointed person in Genting Tenagang Estate (GTGE) is Cik Roslinah Anginti, Genting Bahagia Estate (GBGE) is Pn. Darna binti Yohan and Genting Layang Estate (GLYE) is Cik Safanah Jarani.  |                      |
| Criterion             | 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.                                    | The oil palm cultivation activities for all estates visited do not diminish the land use rights of other users. The conditions stipulated in the land title was adhered to.   | Complied             |

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| Criterion / Indicator |  | Assessment Findings  |   | Compliance |
|-----------------------|--|--|---|------------|
|                       | - Major compliance -   |  |   |            |
| 4.3.2.2               | ownership or lease, history of land tenure and the actual use of the land.  - Major compliance - | Genting Plantation acquired land in directly from Sabah State Government and previous land owners. All documents regarding the legal ownership of the land are available for review. There were no issues of land disputes recorded. All land title were kept in the office and available for review.  Sighted the sample land title as follows:  GTGE |   | Complied   |
|                       |  | Grant No.<br>CL 095317463  | Hectare  4047.00 ha Remarks: 394.41 ha from the total hectare were managed by GLYE as per Internal Memo, ref. no. GPOS- VPGM/089/2K18 dated 30/11/2018 signed by the General Manager, Sabah Region. |            |
|                       |  | GBGE  Grant No.  CL 095316233  CL 095316242  CL 095316993  | Hectare 302.50 ha 304.50 ha 8094.00 ha Divide between GBGE (3820.04 ha) and GTJE (4273.87 ha)   |            |



| Criterio | n / Indicator  | Assessment Findings  |   | Compliance |
|----------|--|--|---|------------|
|          |  | GLYE   |   |            |
|          |  |  | Hectare  1683.00 ha  4047.00 ha Remarks: 3652.59 ha from the total hectare were managed by GTGE as per Internal Memo, ref. no. GPOS-VPGM/089/2K18 dated 30/11/2018 signed by the General Manager, Sabah Region.  per requirement by local authority. FY 2019 as per recorded in Sabah |            |
| 4.3.2.3  | Legal perimeter boundary markers should be clearly                 | Region – Quit Rent for Land Title:  Estates visited maintained clearly | demarcated the legal boundary with  | Complied   |
|          | demarcated and visibly maintained on the ground where practicable. |  | red ring at palm trunks and security  | 20pca.     |
|          | - Major compliance -   | GTGE   |   |            |
|          |  |  | B adjacent with Asia Oil Palm Estate, cated with red and white pole and   |            |
|          |  | GBGE   |   |            |



| Criterio | n / Indicator   | Assessment Findings  | Compliance |
|----------|---|--|------------|
|          |   | Sighted during site visit at P92/53 adjacent with Hwa Li Estate, the boundary was clearly demarcated with red and white pole and security trenches along the boundary.   |            |
|          |   | GTGE   |            |
|          |   | Sighted during site visit at P92/53 adjacent with Hwa Li Estate, the boundary was clearly demarcated with red and white pole and security trenches along the boundary.   |            |
|          |   | GLYE   |            |
|          |   | Sighted during site visit at P99/55 adjacent with Malbumi Estate and P00/2A adjacent to Tay Ah Bu Estate, noted that the boundary was clearly demarcated with red and white pole and security trenches along the boundary.   |            |
| 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 - | Land dispute was raised by the Genting Layang Estate (GLYE) Manager over the land encouragement by Tey Ah Bu Plantation.  A meeting was held with Mr. Romel (representative from Tey Ah Bu Plantation) to reconfirm the encroachment. The representative from Tey Ah Bu plantation has given full explanation about the encroachment and Genting Plantation Berhad has address their intention to take it back the area. The issue still under negotiation and pending for further decision between both top management Genting Plantation Berhad and Tey Ah Bu Plantation. At the moment Genting Plantation is allowing the Tey Ah Bu Plantation to carry out their activity as normal. | Complied   |
|          |   | A. Boundary Stone Information  |            |
|          |   | Boundary Stone Making Coordinate   |            |

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| Criterio  | n / Indicator   |                        | Assessment Findings     | 5   | Compliance |
|-----------|---|------------------------|-------------------------|---|------------|
|           |   | 479/86                 | N:5º 27" 8.37" / I      | E:118º 12" 47.0052"   |            |
|           |   | 490/86                 | N:5º26" 27.7332"        | / / E:118º 13" 8.0292"  |            |
|           |   | 398/86                 | N:5º25" 54.6528"        | / / E:118º 13" 1.848"   |            |
|           |   | B. Encroachment Detai  | ils                     |   |            |
|           |   | Block No               | На                      | Palms   |            |
|           |   | Block 2                | 1.480Ha                 | 160 palms   |            |
|           |   | Block 4                | 0.166Ha                 | 23 palms  |            |
|           |   | Block 5                | 0.640Ha                 | 50 palms  |            |
|           |   | Block 6                | 0.286Ha                 | 18 palms  |            |
|           |   | Block 12               | 0.782Ha                 | 82 palms  |            |
|           |   | Total                  | 3.354Ha                 | 333 palms   |            |
| Criterion | <b>4.3.3</b> – 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. | Genting Plantation Ber | had. There are also no  | g all the estates under<br>land disputes or claims<br>legal land titles for the | Complied   |
| 4.3.3.2   | - Major compliance -  Maps of an appropriate scale showing extent of recognized   | There is no customary  | / land in or surroundin | g all the estates under   | Complied   |
|           | customary rights land, if any, should made available.  - Minor compliance -   | Genting Plantation Ber | had. There are also no  | land disputes or claims<br>legal land titles for the                            |            |



| Criterio  | n / Indicator  | Assessment Findings  | Compliance |
|-----------|--|--|------------|
| 4.3.3.3   | Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.  - Major compliance -                         | There is no customary land in or surrounding all the estates under Genting Plantation Berhad. There are also no land disputes or claims involving these estates. The estate has proper legal land titles for the land ownership.   | Complied   |
| 4.4 Princ | ciple 4: Social responsibility, health, safety and employmen   | t condition  |            |
| Criterion | 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 - | Genting Plantation Berhad has established Sustainability Management Procedure Manual. Sighted SOP No: SMP-GPB-32 titled "Procedures for Social Management ".Issue Date: 2017. The objective SOP to describe the method and to provide guidance and standard procedures for the estate and mills for followings;  i. To promote and maintain social sustainability among workers, staff, management and stakeholders  ii. To identify and manage social risks and impacts in a manner consistent with group social policy, people policy and the applicable social requirement in the sustainability standards  iii. To facilitate implementation of the relevant social requirements and standards  Sighted latest Social Impact Assessment (SIA) for Genting Tenegang Estate (GTGE) dated on 31.10.2019 by Sustainability Department, Genting Bahagia Estate (GBGE) dated on 31.10.2018 by Sustainability Department, Genting Layang Estate (GLYE) dated on 31.10.2018  Survey was conducted with random participants from internal and external respondents. The respondents randomly choose among workers and other stakeholders in estate.  Sighted sample of Social Impact Assessment (SIA) carried out as below; | Complied   |



| Criterion / Indicator | Assessment Findings   | Compliance |
|-----------------------|---|------------|
|                       | A. Genting Tenagang Estate Summary of Issues Raised by the EXTENAL Stakeholder are  | 2.         |
|                       | Positive Impacts Negative Impacts   | 7          |
|                       | GTGE telah memberikan Nil<br>kerjasama yang baik kepada<br>Pihak Jabatan Perhutanan   |            |
|                       | Pihak Polis mengingatkan Pihak Ladang agar melaporkan nama pekerja yang lari sekurang – kurang 3 hari bagi membantu pihak polis menyediakan laporan |            |
|                       | Pihak Ladang di nasihatkan agar Nil<br>memakai alat – alat keselamatan<br>semasa bekerja di ladang  |            |
|                       | Tiada isu berkaitan Human & Nil<br>Wildlife Conflict yang berlaku di<br>ladang  |            |
|                       | Sebarang pagar elektik yang Nil<br>digunakan di ladang perlu di<br>daftarkan di Cawangan<br>Suruhanjaya Tenaga                                      |            |
|                       | Tong racun yang perlu dikitar Nil semua perlu dikumpulkan di satu tempat dan hendaklah di tebuk bagi tujuan pelupusan                               |            |
|                       | Summary of Issues Raised by the INTERNAL Stakeholder a  | re;        |
|                       | Positive Impacts Negative Impacts   |            |



| Criterion / Indicator | Assessme  | nt Findings   | Compliance |
|-----------------------|---|---|------------|
|                       | Kontractor memohon kerjasama<br>agar pihak ladang untuk | Anjing liar berkeliaran di perumahan menganggu ketenteraman pekerja, kantin dan kedai berhampiran  EXTENAL Stakeholder are;  Negative Impacts |            |



| Criterio | n / Indicator  | Assessme  | nt Findings      | Compliance |
|----------|--|---|------------------|------------|
|          |  | Tiada isu berkaitan Human & Wildlife Conflict yang berlaku di ladang  |                  |            |
|          |  | 11  | Negative Impacts |            |
|          | 4.4.2: Complaints and grievances   |   |                  |            |
| 4.4.2.1  | A system for dealing with complaints and grievances shall be established and documented.  - Major compliance - | Procedure Manual. Sighted SOP N<br>for Consultation and Communicatio<br>The objective SOP is for the<br>communication of sustainability | ·                | Complied   |

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| Criterio | n / Indicator        | Assessment Findings  | Compliance |
|----------|----------------------|--|------------|
|          |                      | Sighted Carta Alir Prosedur Konsultasi dan Komunikasi di antara Pihak<br>Pengrusan Ladang / Kilang Genting Plantation dengan Pihak<br>Berkepentingan   |            |
| 4.4.2.2  | - Major compliance - | All complaints were resolved in timely manner. Acknowledgement by signatures of the complainant were available in the complaint/grievance book form.  Sighted sample of Social Impact Assessment (SIA) carried out as below; | Complied   |
|          |                      | Sighted complaint for Genting Bahagia Estate (GBGE);  Name of Suparman Tamrin complainant  Alamat Perumahan Pekerja Genting Bahagia Estate  Date of 14.10.2019   |            |
|          |                      | complainant  Issue Lampu di dalam Surau rosak tidak menyala dan minta digantikan dengan yang baru  Tindakan Lampu telah di gantikan dengan bulb baru   |            |
|          |                      | Date action 16 <sup>th</sup> October 2019 taken  |            |
|          |                      | Sighted complaint for Genting Layang Estate (GLYE);  Name of Safanah Jarani complainant  Alamat Perumahan Pekerja Genting Layang Estate  |            |



| Criterio | n / Indicator  | Assessment Findings | Compliance |
|----------|--|---------------------|------------|
| 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 - |                     | 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 -        |                     | Complied   |



| Criterion / Indicator | Assessment Findings  | Compliance  |
|-----------------------|--|-------------|
|                       | For external stakeholders, similar briefing was condu external stakeholder meeting.  | cted during |
|                       | Sighted Internal Meeting for Genting Bahagia Estate  Date 14 <sup>th</sup> February 2019  Venue Muster ground 5 & 6  Attendance 82 person  Conducted Denny Ng Leng Checak ( Sustainable Cooby  Agenda Penerangan ttg polisi syarikat | rdinator )  |
|                       | Sighted External Meeting for estates and mill  Date 21st October 2019  Venue GTJE Club House   |             |
|                       | Attendance 76 person  Conducted Sustainability Department by   |             |
|                       | Agenda  Penerannga tindakan semasa berlaku keb Pnerangan ringkas mengenai RSPO, MSPO Penerangan Polisi Senarai Dokument Cara membuat Aduan dan kilanan Isu Keselamatan Kontractor CSR HCV  |             |



| Criterio  | n / Indicator   | Assessmer  | nt Findings  | Compliance |
|-----------|---|--|--------------|------------|
| 4.4.2.5   | Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. | Sighted all internal complaints filled, responded and the records being maintained for the last 24 months and available upon request |              | Complied   |
|           | - Major compliance -  |  |              |            |
| Criterion | 4.4.3: Commitment to contribute to local sustainable development  |  |              |            |
| 4.4.3.1   | Growers should contribute to local development in consultation with the local communities.  - Minor compliance -                |  |              | Complied   |
|           |   | B. Genting Bahagia Estate (GBGE)  Internal CSR   | External CSR |            |



| Criterion / Indicator | Assessmer  | nt Findings  | Compliance |
|-----------------------|--|--|------------|
|                       | Pengagihan Limau sempena<br>Perayaan Tahun Baru Cina -<br>RM 800           | Pemberian sumbangan program<br>Sambutan Ulang tahun SMK<br>Segama Lahad Datu yg Ke 20 –<br>RM 200.00 |            |
|                       | Samburan Hari Pekerja –<br>RM 10,000                                       | -  |            |
|                       | Program Berbuka Puasa –<br>RM 2500   | -  |            |
|                       | Program pengagihan daging<br>sempena Hari Raya Aidiladha<br>2019 – RM 7500 | -  |            |
|                       | C. Genting Layang Estate (GLYE)  Internal CSR                              | External CSR   |            |
|                       | Badminton competition prize – RM 500                                       | -  |            |
|                       | Labour Day – RM 7000   | -  |            |
|                       | Contribution of Buffolo during<br>Hari Raya Aidilfitri – RM 2500           | -  |            |
|                       | Rice incentive for high productive worker                                  | -  |            |
|                       | Buka Puasa – RM 1300   | -  |            |
|                       | Badminton competition prize –  | -  |            |



| Criterio | on / Indicator  | Assessment Findings  | Compliance |
|----------|---|--|------------|
| 4.4.4.1  | An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.  - Major compliance -  | Genting SDC has established the Safety and Health Policy signed by President & Chief Operating Officer dated 1/7/2018. In the policy stated the commitment of the group to provide and ensure safe work environment to all the workers and other party involved in the company activities.  The policy was communicated through morning briefing, training and displayed at notice board at designated place in the estate   | 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  ii. all precautions attached to products shall be properly 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). | President & Chief Operating Officer dated 1/7/2018. In the policy stated the commitment of the group to provide and ensure safe work environment to all the workers and other party involved in the company activities. The policy was communicated through morning briefing, training and displayed at notice board at designated place in the estates visited. Latest Safety and health policy training conducted on 1/11/2019 at GTE.  Genting Plantation has established SOP documented in the OSH Manual under section Hazard Identification, Risk Assessment and Risk Control. Refer document no. OM-GPB-07 dated 1/1/2010.  The estates visited The estate has conducted safety and health assessment for all operations and documented in Hazard | Minor NC   |



| Criterion / Indicator   | Assessment Findings   | Compliance |
|---|---|------------|
| 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.  | according to internal procedure requirements. No investigation conducted for 4 accident cases (minor accident) in GTGE and 2 accident cases (minor accident) in GBGE.   |            |
| f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations  | month of June and 1 case (major accident) occur in July 2019.   |            |
| and collective agreements.  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 instructions shall be clearly understood by all employees.  i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents | GLYE  Latest HIRARC was conducted on 1/11/2019 due to accident occur on 10/9/2019. Accident investigation was done on 11/9/2019.  The estate has established training program for employees exposed to pesticides used in the estate to ensure the continuous awareness to the employee. The training was conducted by the Estate Manager, Asst. Manager, and other competent person on the training subject to the supervisors and operators. Sighted the training records as follows: |            |
| should be available at each worksite.   | GTE   |            |
| <ul> <li>j) Records shall be kept of all accidents and be reviewed<br/>periodically at quarterly intervals.</li> </ul>  | i. Policy and SOP for fertilizer store, pesticides store, scheduled waste store, lubricant store and diesel tank training dated 3/8/2019  |            |
| - Major compliance -  | ii. SOP and PPE awareness for sprayers training dated 5/7/2019  |            |
|   | iii. SOP for water treatment training dated 7/6/2019  |            |



| Criterion / Indicator | Assessment Findings  | Compliance |
|-----------------------|--|------------|
|                       | iv. SOP for sprayers training dated 25/2/2019  |            |
|                       | GBGE   |            |
|                       | i. Safety, SOP and pesticides calibration training dated 18/3/2019   |            |
|                       | ii. Pesticides handling training dated 8/3/2019  |            |
|                       | iii. Safety and SOP for Insecticide handling training dated 15/2/2019  |            |
|                       | GLYE   |            |
|                       | i. Chemical store management, SOP and SDS training dated 14/5/2019   |            |
|                       | ii. SOP and PPE awareness for manurer training dated 26/4/2019   |            |
|                       | iii. Chemical calibration, chemical mixing and triple rinsed training dated 13/3/2019  |            |
|                       | The management provide appropriate PPE to the employee's base on the job type. The PPE given as per HIRARC and Standard Operating Procedure. PPE issuance was recorded in Borang Pemberian dan Penggantian PPE by individual basis. Sighted the PPE issuance records for employees as follows: |            |
|                       | GTGE   |            |
|                       | i. E 01019 (Sprayers), latest PPE issue dated 30/10/2019   |            |
|                       | ii. P 00070D (Sprayers), latest PPE issue dated 6/11/2019  |            |
|                       | iii. E 11357 (Sprayrers) Latest PPE Issue dated 6/11/2019  |            |
|                       | Additionally, the sprayers were send for medical screening once a month conducted by the HA and medical surveillance on annually basis. Sighted the latest report on medical surveillance conducted on   |            |



| Criterion / Indicator | Assessment Findings   | Compliance |
|-----------------------|---|------------|
|                       | 12/2/2019 and 19/10/2019 for 71 workers. 70 workers were found fit to work while 1 workers were found unfit to handle chemical and recommended to be removed.   |            |
|                       | GBGE  |            |
|                       | i. AU 289034 (Sprayers), latest PPE issue dated 7/11/2019   |            |
|                       | ii. AU 295864(Sprayers), latest PPE issue dated 24/10/2019  |            |
|                       | iii. AT 701024 (Sprayrers) Latest PPE Issue dated 7/11/2019   |            |
|                       | Additionally, the sprayers were send for medical screening once a month conducted by the HA and medical surveillance on annually basis. Sighted the latest report on medical surveillance conducted on 13/3/2019 for 84 workers and were found fit to work. |            |
|                       | GLYE  |            |
|                       | i. P00058 (Manurer), latest PPE issue dated 11/11/2019  |            |
|                       | ii. E00252 (Manurer), latest PPE issue dated 11/11/2019   |            |
|                       | iii. E01032 (Manurer), latest PPE Issue dated 11/11/2019  |            |
|                       | iv. E00767 (Manurer) Latest PPE Issue dated 11/11/2019  |            |
|                       | Additionally, the sprayers were send for medical screening once a month conducted by the HA and medical surveillance on annually basis. Sighted the latest report on medical surveillance conducted on 13/2/2019 for 24 workers and were found fit to work. |            |
|                       | Noted during interview with chemical applicator (manurer and sprayers) shows acceptable awareness and understanding on the importance of wearing appropriate PPE during chemical application.   |            |



| Criterion / Indicator | Assessment Findings   | Compliance |
|-----------------------|---|------------|
|                       | The management has established SOP for handling chemical and documented in the System Procedure: Chemical Management. Refer document no. SP-MGR-08 dated 1/8/2017.  |            |
|                       | Genting Plantation appointed the Estate Manager as the person responsible for workers safety and health. The estate management has established Safety and Health committee consist representatives from Employer and Employee as per appointment letter signed by the Estate Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. |            |
|                       | GTGE  |            |
|                       | Sighted the appointment letter for GTGE manager signed by the Vice President – Plantations (Sabah – Region 2) dated 25/5/2019.  |            |
|                       | GBGE  |            |
|                       | Sighted the appointment letter for GBGE manager signed by the Vice President – Plantations (Sabah – Region 2) dated 17/8/2019.  |            |
|                       | GLYE  |            |
|                       | Sighted the appointment letter for GBGE manager signed by the Vice President – Plantations (Sabah – Region 2) dated 19/9/2019 and acknowledgement by the Estate Manger dated 20/9/2018.   |            |
|                       | The management conducted OSH committee meeting on quarterly basis. In the meeting discussed issue on employees' safety, health and welfare such as accident statistic and action plan, housing inspection, work place inspection, accident at workplace report and other matters related to safety and health.  |            |



| Criterion / Indicator | Assessment Findings  | Compliance |
|-----------------------|--|------------|
|                       | GTGE   |            |
|                       | Sighted the latest minutes meeting conducted on 24/10/2019, 22/7/2019 and 15/4/2019  |            |
|                       | GBGE   |            |
|                       | Sighted the latest minutes meeting conducted on 27/9/2019, 22/6/2019 and 15/3/2019   |            |
|                       | GLYE   |            |
|                       | Sighted the latest minutes meeting conducted on 3/9/2019, 21/6/2019 and 22/3/2019  |            |
|                       | Noted that the meeting conducted covers all issue on safety and health in the estate.  |            |
|                       | Genting Plantations has established Standard Operating Procedure for Emergency Response Plan documented in OSH Manual under section Emergency Response Plan. Refer document no. OM-GPB-04 dated 1/1/2010. The SOP was communicated to the workers through morning briefing and training. Latest fire drill/training was conducted on 23/9/2019 for GTGE, 23, 24/9/2019 for GBGE and 8/3/2019 and 10/10/2019 for GLYE |            |
|                       | Competent first aider were present at all estates visited. For field operations, store keeper, Mandore or bunch counter for each gang were trained and appointed as the first aid handler and bring the first aid kit daily to the field. Training was conducted by competent first aider. First aid box inspection was conducted on monthly basis by HA at respective estates.                                      |            |



| Criterio  | n / Indicator   | Assessment Findings   | Compliance |
|-----------|---|---|------------|
|           |   | GTGE  |            |
|           |   | Noted during interview with the spraying gang mandore shows the knowledge of first aid kit. Sighted the First Aid training dated 22/7/2019  |            |
|           |   | GBHE  |            |
|           |   | Noted during interview with the spraying gang mandore shows the knowledge of first aid kit. Sighted the first aid training conducted on 14/3/2019 and 1/10/2019                             |            |
|           |   | GLYE  |            |
|           |   | Noted during interview with the spraying gang mandore shows the knowledge of first aid kit. Sighted the first aid training conducted on 8/3/2019  |            |
|           |   | The estate visited monitored and kept record for all accident cases and recorded in the Accident Statistic Report which submitted to the Group Safety Officer on monthly basis.             |            |
|           |   | Investigation on accident cases has been conducted and reported to be reviewed by Group Safety Officer.   |            |
|           |   | The accident occurred was reviewed on quarterly basis during OSH committee meeting.   |            |
| Criterion | <b>4.4.5:</b> Employment conditions   |   |            |
| 4.4.5.1   | The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The | Genting Plantation Berhad has established Policy of Social, dated 22.06.2015. The Policy has signed by the Mr. Yong Chee Kong, President & Chief Operating Officer dated on 22th June 2015. | Complied   |



| Criterio | n / Indicator  | Assessment Findings  | Compliance |
|----------|--|--|------------|
|          | policy shall be signed by the top management and effectively communicated to the employees.  | Communication of all the policies to workforce is through training and to External Stakeholders through the Stakeholder Meeting.   |            |
|          | - Major compliance -   | The policy was displayed at the strategic location, induction & training, memo and meeting.  |            |
| 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.  - Major compliance - | President & Chief Operating Officer dated on 22.06.2015 in order to ensure equal opportunity and treatment regardless of race, colour,   | Complied   |
|          |  | is no evidence that the management engage in or support any discriminatory practices.  |            |
|          |  | The commitment to no discrimination is also stated in the company's social policy.   |            |
| 4.4.5.3  | Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed  | Pay and conditions are documented in the Workers' Contract<br>Agreement and wage payment records / pay slip.   | Complied   |
| r        | Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.   | The salary is according to 'Guidelines on the Implementation on the Minimum Wages'. National Wages Consultative Council Act 2011 (Act 732) Malaysian minimum salary is RM1,100.00 as stated in the |            |
|          | - Major compliance -   | guidelines. Sighted Permit for Deduction of Workers Wages from Jabatan Tenaga Kerja.   |            |



| Criterion / Indicator | Assessment Findings  Interview with both Estate staff and workers and with both male and female confirmed that they understand the terms and conditions of their employment.  A. Genting Tenagang Estate (GTGE) |             |                |                            |                          |         |  |  |
|-----------------------|---|-------------|----------------|----------------------------|--------------------------|---------|--|--|
|                       |   |             |                |                            |                          |         |  |  |
|                       | No  | ID          | Nationality    | Passport<br>Expiry<br>Date | Permit<br>Expiry<br>Date | Wages   |  |  |
|                       | 1   | E 00091     | Indonesia      | 11.01.2023                 | 21.02.2020               | 2318.50 |  |  |
|                       | 2   | E 11493     | Indonesia      | 28.11.2022                 | 01.01.2020               | 2119.45 |  |  |
|                       | 3   | E 11385     | Indonesia      | 23.12.2021                 | 22.01.2020               | 1457.93 |  |  |
|                       | 4   | E 11653     | Indonesia      | 04.06.2023                 | 21.02.2020               | 2015.91 |  |  |
|                       | 5   | E 11414     | Indonesia      | 18.05.2024                 | 13.02.2020               | 3189.51 |  |  |
|                       | 6   | E 11592     | Indonesia      | 04.05.2023                 | 04.07.2020               | 2797.79 |  |  |
|                       | 7   | E 11595     | Indonesia      | 04.05.2023                 | 04.07.2020               | 2432.95 |  |  |
|                       | 8   | E 10299     | Malaysia       | -                          | -                        | 1838.17 |  |  |
|                       | B. Ge   | nting Bahag | ia Estate (GEG | GB)                        |                          |         |  |  |

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| Criterion / Indicator |       | Assessment Findings             |                 |                         |                          |         |  |  |  |
|-----------------------|-------|---------------------------------|-----------------|-------------------------|--------------------------|---------|--|--|--|
|                       | No    | ID                              | Nationalit<br>y | Passport<br>Expiry Date | Permit<br>Expiry<br>Date | Wages   |  |  |  |
|                       | 1     | E 00091                         | Indonesia       | 11.01.2023              | 21.02.2020               | 2318.50 |  |  |  |
|                       | 2     | E12159                          | Indonesia       | 12.03.2023              | 07.06.2020               | 1092.75 |  |  |  |
|                       | 3     | E12102                          | Indonesia       | 22.11.2022              | 01.01.2020               | 1447.59 |  |  |  |
|                       | 4     | E12284                          | Indonesia       | 01.04.2024              | 30.09.2020               | 1130.40 |  |  |  |
|                       | 5     | E11955                          | Indonesia       | 28.12.2021              | 22.01.2020               | 1410.11 |  |  |  |
|                       | 6     | P00014                          | Indonesia       | 24.02.2022              | 25.09.2020               | 1115.93 |  |  |  |
|                       | 7     | E12264                          | Indonesia       | 17.07.2023              | 24.01.2020               | 1158.16 |  |  |  |
|                       | 8     | E12279                          | Malaysia        | -                       | -                        | 1128.90 |  |  |  |
|                       | 9     | E12142                          | Malaysia        | -                       | -                        | 1627.41 |  |  |  |
|                       | 10    | E12155                          | Malaysia        | -                       | -                        | 2018.18 |  |  |  |
|                       | C. Ge | C. Genting Layang Estate (GLYE) |                 |                         |                          |         |  |  |  |



| Criterio | Criterion / Indicator  |  |        | Assessment Findings |                                |                          |         |  |          |  |
|----------|--|--|--------|---------------------|--------------------------------|--------------------------|---------|--|----------|--|
|          |  | No   | ID     | Nationalit<br>y     | Passport<br>Expiry Date        | Permit<br>Expiry<br>Date | Wages   |  |          |  |
|          |  | 1  | E01105 | Indonesia           | 10.11.2022                     | 25.12.2019               | 2119.51 |  |          |  |
|          |  | 2  | E00995 | Indonesia           | 02.04.2021                     | 19.05.2020               | 5140.82 |  |          |  |
|          |  | 3  | E01159 | Indonesia           | 16.05.2023                     | 02.07.2020               | 2046.60 |  |          |  |
|          |  | 4  | E00887 | Indonesia           | 27.03.2023                     | 05.02.2020               | 1296.92 |  |          |  |
|          |  | 5  | E01120 | Indonesia           | 12.09.2022                     | 25.12.2019               | 2131.38 |  |          |  |
|          |  | 6  | E00992 | Indonesia           | 03.11.2020                     | 06.03.2020               | 2422.21 |  |          |  |
|          |  | 7  | E00866 | Malaysia            | -                              | -                        | 1052.16 |  |          |  |
| 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 | The pay for employees of contractors was monitored by the management through obtaining the pay slips from the contractors for all their workers.   |        |                     |                                |                          |         |  | Complied |  |
|          | employee.  - Minor compliance -  | The salary is according to 'Guidelines on the Implementation on the Minimum Wages Order 2016'. National Wages Consultative Council Act 2011 (Act 732) Malaysian minimum salary is RM 1,100.00 as stated in the guidelines. |        |                     |                                |                          |         |  |          |  |
|          |  |  |        |                     | workers were<br>payslip for Se | •                        | •       |  |          |  |



| Criterio | n / Indicator   | Assessment Findings  | Compliance |
|----------|---|--|------------|
|          |   | were met with national minimum wage as per Minimum Wage Order (Amendment) 2018   |            |
| 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 - | Employee data base is kept and maintained in the computer system (Lyntramax). All the required information by this standard was available in the data based.  Sighted, the registration card being established for all workers. The registration card stated the offered position, wages implied, working hours, OT, allowances, rest day, working on holiday etc. | Complied   |
| 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.  | There is a Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined. Contract and agreement for workers including foreign workers and pay and conditions are documented and are above the industry minimum standard.  | Complied   |
|          | - Major compliance -  | Employment contracts were available in language that understood by<br>the workers. The contract has the details about the payments and<br>employment conditions such as period of working, working hour,<br>medical assistance, housing, holiday, annual leave, period of notice to<br>terminate the contract, etc.  |            |
|          |   | The contract agreement is signed by both employee and employer and accompanied with respective witnesses. Workers employed consisted of local, Indonesian.   |            |
| 4.4.5.7  | The management shall establish a time recording system that makes working hours and overtime transparent for both   | Working hours is 8 hours. From Saturday to Thursday. The overtime maximum is 104 hours according to Malaysian Law.   | Complied   |
|          | employees and employer.  - Major compliance -   | All estates are using check roll book to record the worker attendance at muster ground.  |            |



| Criterion / Indicator |  |                                      | Assessment Findings   |  |  |            |  |  |  |
|-----------------------|--|--------------------------------------|---|--|--|------------|--|--|--|
| 4.4.5.8               | The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.  - Major compliance - | Sighte<br>by bo<br>There             | The working hour and break time has been clearly stated in the Employment Contract.  Sighted in the Contract Agreement the rate of overtime which agreed by both parties.  There is no complaint received regarding payment or forced to work on overtime during site interview.  |  |  |            |  |  |  |
| 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 -  | deduce<br>that that t                | Salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker. Workers interviewed confirmed that they are being paid according the stipulated minimum wage and that they understand all the deductions being made.  A. Genting Tenagang Estate (GTGE)  No ID Nationality Passport Permit Wages Expiry |  |  |            |  |  |  |
|                       |  | 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8 | E 00091<br>E 11493<br>E 11385<br>E 11653<br>E 11414<br>E 11592<br>E 11595<br>E 10299  | Indonesia Indonesia Indonesia Indonesia Indonesia Indonesia Indonesia Indonesia Malaysia | 28.11.2022<br>23.12.2021<br>04.06.2023<br>18.05.2024<br>04.05.2023 | 21.02.2020 | 2318.50<br>2119.45<br>1457.93<br>2015.91<br>3189.51<br>2797.79<br>2432.95<br>1838.17 |  |  |



| Criterion / Indicator | Assessment Findings |                  |                             |                             |                          |         | Compliance |
|-----------------------|---------------------|------------------|-----------------------------|-----------------------------|--------------------------|---------|------------|
|                       | B. Ge               | nting Baha       | gia Estate ((               | GBGE)                       |                          |         |            |
|                       | No                  | ID               | Nationalit<br>y             | Passport<br>Expiry Date     | Permit<br>Expiry<br>Date | Wages   |            |
|                       | 1                   | E 00091          | Indonesia                   | 11.01.2023                  | 21.02.2020               | 2318.50 |            |
|                       | 2                   | E12159           | Indonesia                   | 12.03.2023                  | 07.06.2020               | 1092.75 |            |
|                       | 3                   | E12102           | Indonesia                   | 22.11.2022                  | 01.01.2020               | 1447.59 |            |
|                       | 4                   | E12284           | Indonesia                   | 01.04.2024                  | 30.09.2020               | 1130.40 |            |
|                       | 5                   | E11955           | Indonesia                   | 28.12.2021                  | 22.01.2020               | 1410.11 |            |
|                       | 6                   | P00014           | Indonesia                   | 24.02.2022                  | 25.09.2020               | 1115.93 |            |
|                       | 7                   | E12264           | Indonesia                   | 17.07.2023                  | 24.01.2020               | 1158.16 |            |
|                       | 8                   | E12279           | Malaysia                    | -                           | -                        | 1128.90 |            |
|                       | 9                   | E12142           | Malaysia                    | -                           | -                        | 1627.41 |            |
|                       | 10                  | E12155           | Malaysia                    | -                           | -                        | 2018.18 |            |
|                       | C. Ge               | nting Laya<br>ID | ng Estate (G<br>Nationality | LYE)  Passport  Expiry Date | Permit<br>Expiry<br>Date | Wages   |            |
|                       | 1                   | E01105           | Indonesia                   | 10.11.2022                  | 25.12.2019               | 2119.51 |            |
|                       | 2                   | E00995           | Indonesia                   | 02.04.2021                  | 19.05.2020               | 5140.82 |            |
|                       | 3                   | E01159           | Indonesia                   | 16.05.2023                  | 02.07.2020               | 2046.60 |            |
|                       | 4                   | E00887           | Indonesia                   | 27.03.2023                  | 05.02.2020               | 1296.92 |            |

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| Criterion | Criterion / Indicator   |                  |   | Asse  | ssment Find                          | ings       |         |          | Compliance |
|-----------|---|------------------|---|---|--------------------------------------|------------|---------|----------|------------|
|           |   | 5                | E01120  | Indonesia   | 12.09.2022                           | 25.12.2019 | 2131.38 |          |            |
|           |   | 6                | E00992  | Indonesia   | 03.11.2020                           | 06.03.2020 | 2422.21 |          |            |
|           |   | 7                | E00866  | Malaysia  | -                                    | -          | 1052.16 |          |            |
| 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 -  Other benefits such as motorcycle allowance and turn-out incentive were provided by the employer and verifiable in the pay slips. T establishment of estate clinic provides the medical care for the worker and their dependents. Education through HUMANA school is provided to medical and accident insurance. Since I Jan 2019 foreign worker accover under SOCSO |                  |   | pay slips. Th<br>for the worked<br>ool is provide<br>provided wit | ne<br>rs<br>ed<br>th                 | Complied   |         |          |            |
|           |   | stand            |   | using and fa  | gn workers ind<br>cilities. Electrid |            |         |          |            |
| 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.  | with t<br>(Act 4 | The workers quarters was found to be habitable and in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446). Treated potable water and electricity were provided to the housing for free of charge. |   |                                      |            | 0       | Complied |            |
|           | - Major compliance -  |                  |   |   |                                      |            |         |          |            |
| 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.   | dated            | Genting Plantation Berhad has established Sexual Harassment Policy, dated 3th August 2009. The Policy has signed by the Mr. Yong Chee Kong, President & Chief Operating Officer.  |   |                                      |            |         |          | Complied   |
|           | - Major compliance -  |                  |   |   |                                      |            |         |          |            |



| Criterion | / Indicator   | Assessment Findings  | Compliance |
|-----------|---|--|------------|
|           |   | The policy was communicated by displayed at the strategic location, induction & training, memo and meeting. Interviews of internal stakeholders confirmed awareness and understanding of the Policy.   |            |
| 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 - | No trade union at the visited estates. Local or foreign workers are given the freedom which it is an optional for them to join worker union formed in estates. Thus, their freedom are not restrict by mill management   | Complied   |
| 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 -  | Genting Plantation Berhad has established and implemented minimum age policy and no children below ages of 18 working in the estate and this was proven through checking the list of employees as well as their biodata and through estate visits  Inspection of a sample of personnel files at the estates office confirmed recruits' ages were checked against their Identity Card for Malaysian workers or their passport in the case of foreign workers. Under-age persons were not observed at any of the work locations visited. | Complied   |
| Criterion | 4.4.6: Training and competency  | possessione reconstruction are any or one reconstruction reconstruction.   |            |
| 4.4.6.1   | All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the  | The estates visited has established training program for all employee and contractors based on training need analysis conducted.   | Complied   |



| Criterion / Indicator   | Assessment Findings  | Compliance |
|---|--|------------|
| Scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.  - Major compliance - | Assessment Findings  Sighted the training records as follows: GTE  i. Company Policy briefing dated 12/10/2019  ii. Policy and SOP for fertilizer store, pesticides store, scheduled waste store, lubricant store and diesel tank training dated 3/8/2019  iii. First Aid training dated 22/7/2019  iv. Occupational Safety and Health Act 1994 training dated 4/11/2019.  v. SOP for water sampling training dated 7/6/2019  vi. SOP for workshop operator training dated 10/10/2019  vii. Road safety campaign dated 22/5/2019  GBGE  i. Safety work procedure for manurer training dated 13/2/2019  iii. SOP for genset handling training dated 11/2/2019  iv. SOP for water treatment training dated 9/2/2019  v. Riparian buffer zone management training dated 19/8/2019  GLYE | Compliance |
|   | <ul><li>i. SOP, PPE, HIRARC and Safety for vehicle/machinery handling dated 26/8/2019</li><li>ii. Scheduled Waste handling training dated 6/11/2019</li></ul>  |            |



| Criterio  | n / Indicator  | Assessment Findings   | Compliance |
|-----------|--|---|------------|
|           |  | iii. Sexual harassment at workplace training dated 20/8/2019  |            |
|           |  | iv. RSPO, Employment contract and company policy briefing dated2/10/2019  |            |
|           |  | v. ISCC, RSPO and MSPO for FFB contractors training dated 29/8/2019   |            |
| 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 competency required to all employees based on their job description. | The estate has conducted Training need analysis to identified the training required for the employee. The analysis was conducted base on job designation and type of training required.             | Complied   |
|           | - Major compliance -   |   |            |
| 4.4.6.3   | A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.                                  | The estate continuously provided the training to the workers as per plan. The training plan was reviewed on annually basis base on the training need analysis conducted.                            | Complied   |
|           | - Minor compliance -   |   |            |
| 4.5 Princ | ciple 5: Environment, natural resources, biodiversity and ed   | cosystem services   |            |
| Criterion | 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.   | Genting Plantations has established Environmental Policy signed by the Chief Operating Officer dated 5/1/2009. In the policy stated the company commitment to ensure all operation are conducted in | Complied   |
|           | - Major compliance -   | environmentally-responsible and sustainable manner.   |            |



| Criterio | n / Indicator  | Assessment Findings   | Compliance |
|----------|--|---|------------|
|          |  | The policy was communicated to the employee through training, muster briefing and displayed at several notice board in the estate.  |            |
| 4.5.1.2  | The environmental management plan shall cover the following:  a) An environmental policy and objectives;  b) The aspects and impacts analysis of all operations.  - Major compliance - | Genting Plantations has established SOP for aspects impacts analysis documented in Sustainability Management Procedure Manual under section SMP-GPB-29 dated 1/6/2018.  The estates visited has conducted the aspects and impacts analysis for all the operations and documented in the Identification of Environmental Aspect and Impact and Evaluation of Significance Form. The operation were analyzed based on the activity, type of operation, pollution generated and the impact of the activities to the environment. The estate has established Environmental Improvement and Management Plan base on the significant aspect identified during aspects and impacts analysis. | Complied   |
| 4.5.1.3  | An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.  - Major compliance -  | The estates visited has established Environmental Improvement and Management Plan base on the significant aspect identified during aspects and impacts analysis. The plan was reviewed on annually basis.  The plan stated the source of pollution identified, negative impacts, improvement/mitigation plan, data required, monitoring and action plan, person responsible and timeline.  GTGE  The estate has established Pollution Prevention Plan base on aspects and impacts analysis conducted. Latest review was conducted on 3/8/2019.  | Complied   |



| Criterion / Indicator | Assessment Findings  | Compliance |
|-----------------------|--|------------|
|                       | Sighted the implementation of the management plan as follows:  |            |
|                       | i. Sighted during site visit at the landfill area located in field P92/8, the recycle waste was segregated and stored at designated storage area before disposed to recycler. Sighted the records of disposal as per payment voucher/receipt no. 18428, 18429, 25936 and 17335 |            |
|                       | ii. The estate premix chemical at premix area. The waste water from<br>the premixing process were collected in collection sump before<br>recycled back for chemical premixing.   |            |
|                       | iii. The estate has established the monitoring service of vehicle and machineries.   |            |
|                       | GBGE   |            |
|                       | The estate has established Environmental Improvement and Management Plan base on aspects and impacts analysis conducted. Latest review was conducted on 27/5/2019.   |            |
|                       | Sighted the implementation of the management plan as follows:  |            |
|                       | i. The estate conducted daily inspection to monitor the condition of the vehicle. Sighted the inspection records for the month of October, September and August 2019.  |            |
|                       | ii. Linesite inspection was conducted on weekly basis. Sighted the inspection records dated 2/11/2019, 5/11/2019, 28/10/2019 and 20/10/2019.   |            |
|                       | GLYE   |            |



| Criterio | n / Indicator  | Assessment Findings   | Compliance |
|----------|--|---|------------|
|          |  | i. The estate conducted daily inspection to monitor the condition of the vehicle. Sighted the inspection records for vehicle no SD4839F for the month of October, September and August 2019.  |            |
|          |  | ii. The estate premix chemical at premix area. The waste water from<br>the premixing process were collected in collection sump before<br>recycled back for chemical premixing.  |            |
|          |  | iii. Linesite inspection was conducted on weekly basis. The inspection includes the house surrounding conditions, evidence of burning and others related to environmental issue. Sighted the inspection records dated 9/10/2019, 21/10/2019, 30/10/2019 and 26/11/2019. |            |
| 4.5.1.4  | A programme to promote the positive impacts should be included in the continual improvement plan.  | The program to promote positive impacts activities to the environment has been included in the Pollution Prevention Plan. Sampled of the positive impacts as follows:   | Complied   |
|          | - Minor compliance -   | i. Segregation of waste at collection point for recycling   |            |
|          |  | ii. Nutrient run-off, frond stacking T-Shape and along waterways/parallel with waterways  |            |
| 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 objectives. | The estates visited has established training program for all the employee and documented in annual training program. The training plan , Policies, Environmental Aspects and Impacts, Environmental control procedure and etc.  | Complied   |
|          | - Major compliance -   |   |            |



| Criterio  | n / Indicator  |   | Ass   | essment Findi | ngs                                   |  | Compliance |
|-----------|--|---|---|---------------|---------------------------------------|--|------------|
| 4.5.1.6   | Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.  |   | Environmental related matters were discussed during Internal stakeholder meeting. Latest meeting was conducted on 28/8/2019.  |               |                                       |  |            |
|           | - Major compliance -   | importance of   | Noted during interview with employee shows the understanding on the importance of environmental quality. The employee are also encouraged to discuss environmental issues with the management.  |               |                                       |  |            |
| 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 an appropriate timeframe. There   | The monitoring of non-renewable energy usage was conducted on monthly basis. Sighted the records of diesel consumption per FFB production FY 2017 – todate 2019 as follows: |   |               |                                       |  | Complied   |
|           | should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the   | Month   | GTGE  | GBGE          | GLYE                                  |  |            |
|           | operations over the base period.   | 2017  | 5.48  | 5.63          | 5.61                                  |  |            |
|           | - Major compliance -   | 2018  | 6.99  | 6.62          | 7.63                                  |  |            |
|           |  | As to date 2019   | 3.71  | 6.11          | 7.00                                  |  |            |
|           |  |   |   |               | an to Improve Eff<br>onducted on 20/9 |  |            |
| 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, incl<br>efficiency of the<br>including all tra  | The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets. |               |                                       |  | Complied   |



| Criterio  | n / Indicator   | Assessment Findings  | Compliance |
|-----------|---|--|------------|
|           | - Major compliance -  |  |            |
| 4.5.2.3   | The use of renewable energy should be applied where possible.  - Minor compliance -   | No renewable energy used in the estate   | Complied   |
| Criterion | 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 -   | The estate visited had identified all waste products and its source of pollution and documented in Identification, segregation and Storage of Waste. The sampled identification was group base on the pollution source as follows: | Complied   |
|           |   | i. Workshop and mechanic area – Filters, lubricants, battery, rags, gloves, tyres, oxygen and acetylene, scrap iron  |            |
|           |   | ii. Vehicle used spare part store – Hydraulic hose, cylinders, dismantled equipment  |            |
|           |   | iii. Office and weighbridge – domestic, recyclable paper, PC and printer cartridges  |            |
|           |   | iv. Diesel Tank – Scheduled Waste  |            |
|           |   | v. Chemical Store – Containers, boxes  |            |
|           |   | vi. etc  |            |
| 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: | The mill has established the waste management plan base on the waste identification conducted and reviewed on annually basis.  | Minor NC   |
|           | a) Identifying and monitoring sources of waste and pollution  | The plan stated the source of pollution, management plan, monitoring and action plan, data required and person in charge.  |            |



| Criterion / Indicator  | Assessment Findings  | Compliance |
|--|--|------------|
| b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products | Sighted the implementation of the waste management plan as follows: GTE  |            |
| - Major compliance -   | Waste management plan was reviewed on 3/9/2019. Sighted the implementation of the management plan as follows;  |            |
|  | i. Sighted during site visit at the landfill area located in field P92/8, the recycle waste was segregated and stored at designated storage area before disposed to recycler. Sighted the records of disposal as per payment voucher/receipt no. 18428, 18429, 25936 and 17335   |            |
|  | GBGE   |            |
|  | i. Sighted the 5 <sup>th</sup> Schedule reported to DOE through E-SWISS for the month of April, May and June 2019 and stock card for month July, August and September 2019.  |            |
|  | ii. Sighted during site visit sighted the evidence of recycle waste such as paper boxes and plastic water bottle was disposed in the landfill even though the estate management has established designated place for 3R collection centre. Thus, the management plan was not effectively implemented.  |            |
|  | GLYE   |            |
|  | i. The estate continue to promote the #R program to the workers. The estate has established designated collection center for recycle waste at the linesite area. Sighted the records of disposal as per receipt no.18437 and payment voucher dated 2/10/2019 and 11/9/2019. The estate monitor the sales of recycle items and recorded in Record Entry and Production of Recycled Materials in 2019. |            |



| Criterior | / Indicator  | Assessment Findings   | Compliance |
|-----------|--|---|------------|
|           |  | ii. The domestic waste was collected 3 times a week as per schedule established. Sighted the waste collection records for the month of October and September 2019 recoded in the Vehicle Running Expenditure books for tractor SD2164P. The domestic waste was disposed at designated landfill. During site visit, noted that only domestic waste was disposed in the landfill.   |            |
|           |  | iii. The estate maintain the inventory for the Scheduled waste generated recorded in the Stock/Bin Card. Sighted the Bin Card for SW 410, SW 305, SW 102 and empty pesticides container as at 31/10/2019. The inventory reported to DOE through E-SWISS System. Sighted the E-SWISS report for the month of November 2019.  |            |
| 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.  - Major compliance - | Genting SDC has established the SOP for handling of used chemicals and documented in System Procedure: Scheduled Waste. Refer document no. SP-MGR-09 dated 1/8/2017.  Estates visited also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected at both estate visited and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. | Complied   |
|           |  | Observed during workers interview with storekeeper shows the understanding the proper disposal for waste as all used lubricant and contaminated spill kit will be collected as Scheduled Waste and stored in designated storage area.   |            |
|           |  | All the records were found adequate as per required by EQ (Scheduled Waste) Regulations 2005.   |            |



| Criterion / Indicator | Assessment Findings  | Compliance |
|-----------------------|--|------------|
|                       | Inventory for all scheduled waste generated were recorded in stock card and reported to DOE through E-SWISS.   |            |
|                       | GTGE   |            |
|                       | Sighted the 5 <sup>th</sup> Schedule reported to DOE through E-SWISS for the month of April, May and June 2019 and stock card for month July, August and September 2019. |            |
|                       | Sighted the sampled scheduled waste disposal records:  |            |
|                       | i. 2/8/2019, SW 404, C/N no. CG1E003   |            |
|                       | ii. 26/6/2019, SW 305, C/N no. B005318   |            |
|                       | iii. 26/6/2019, SW 408, C/N no. B005317  |            |
|                       | iv. 26/6/2019, SW 409, C/N no. B005316   |            |
|                       | v. 26/6/2019, SW 410, C/N no. B005315  |            |
|                       | GBGE   |            |
|                       | Sighted the 5 <sup>th</sup> Schedule reported to DOE through E-SWISS for the month of October 2019 and stock card for month July, August and September 2019.             |            |
|                       | Sighted the sampled scheduled waste disposal records:  |            |
|                       | i. 26/6/2019, SW 305, C/N no. B005312  |            |
|                       | ii. 26/6/2019, SW 102, C/N no. B005311   |            |
|                       | iii. 26/6/2019, SW 409, C/N no. B005313  |            |
|                       | iv. 26/6/2019, SW 410, C/N no. B005314   |            |



| Criterion | n / Indicator   | Assessment Findings   | Compliance |
|-----------|---|---|------------|
| 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 manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.  - Major compliance - | GLYE  Sighted the 5 <sup>th</sup> Schedule reported to DOE through E-SWISS for the month November 2019.  Sighted the sampled scheduled waste disposal records: i. 26/6/2019, SW 305, C/N no. B005307 ii. 26/6/2019, SW 102, C/N no. B005306 iii. 26/6/2019, SW 409, C/N no. B005308 iv. 26/6/2019, SW 410, C/N no. B005309 v. 22/8/2019, SW 404, C/N no. 2019092412H7SOPG  Empty pesticides containers were triple rinse and punctured and stored at the designated store before collected by the approved contractors, G-Planter for disposal.  GTGE  Sighted the inventory of Empty Chemical Container recorded in Stock Card. Last disposal was done on 26/6/2019. As per todate, 225 pieces of empty container were in storage area.  GBGE  Sighted the inventory of Empty Chemical Container recorded in Stock Card. Last disposal was done on 26/6/2019. As per todate, 82 pieces | Compliance |
|           |   | of empty container were in storage area GLYE  |            |



| Criterio | n / Indicator  | Assessment Findings  | Compliance |  |
|----------|--|--|------------|--|
|          |  | Sighted the inventory of Empty Chemical Container recorded in Stock Card. Last disposal was done on 26/6/2019.   |            |  |
| 4.5.3.5  | Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. | Domestic waste were disposed at designated landfill located at more than 30 meters away from any nearest natural waterways.  | Complied   |  |
|          | - Minor compliance -   | GTGE   |            |  |
|          |  | The domestic waste was collected 3 times a week as per schedule established. Sighted the waste collection records for the month of October and September 2019.   |            |  |
|          |  | The domestic waste was disposed at designated landfill. During site visit, noted that only domestic waste was disposed in the landfill.  |            |  |
|          |  | GBGE   |            |  |
|          |  | The domestic waste was collected at minimum 2 times a week as per schedule established. Sighted the waste collection records for the month of August and September 2019.   |            |  |
|          |  | GLYE   |            |  |
|          |  | The domestic waste was collected 3 times a week as per schedule established. Sighted the waste collection records for the month of October and September 2019 recoded in the Vehicle Running Expenditure books for tractor SD2164P.  |            |  |
| l        |  | Noted during interview with the workers at visited estates, noted that the understanding on prohibition on burning domestic waste at the linesite area is acceptable. All domestic waste must be collected at the rubbish bin provided before collected and disposed at designated landfill. |            |  |



| Criterion / Indicator |   | Assessment Findings  | Compliance |
|-----------------------|---|--|------------|
| 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, scheduled wastes, solid wastes and effluent.  - Major compliance -                          | The estate has conducted assessment of all polluting activities during aspects and impacts analysis for all the operations and documented in the Identification of Environmental Aspect and Impact and Evaluation of Significance Form including greenhouse gas emissions, scheduled waste and solid wastes. | Complied   |
| 4.5.4.2               | An action plan to reduce identified significant pollutants and emissions shall be established and implemented.  - Major compliance -  | The estate has established management plan for all polluting activities and documented in the established Management Plan to Improve Efficiency of Diesel Usage FY 2019. The plan was reviewed on annually basis. Latest review was conducted on 20/9/2019.  | Complied   |
| Criterion             | 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: | All estates visited has established water management plan to monitor the quality and availability of natural water resources. Sighted the implementation of the management plan as follows:  | Complied   |
|                       | a. Assessment of water usage and sources of supply.   | GTGE i. The estate monitored drinking water quality by conducted water   |            |
|                       | b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that  | sampling on quarterly basis. Sighted the result of water analysis a  |            |
|                       | reflects the estate's current activities.   | b. After treatment   |            |
|                       | c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application,   | Report ref: W190921/02   |            |
|                       | maintenance of equipment to reduce leakage, collection of rainwater, etc.).   | Date of reporting: 21/9/2019   |            |



| Criterion / Indicator  |  | Assessment F   | Findings | Compliance |
|--|--|--|----------|------------|
| <ul> <li>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</li> <li>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</li> <li>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</li> <li>- Major compliance -</li> </ul> | Drinking ii. The estates visi sampling twice a a. Report ref: R19 Date of reporting Result: Conform National GBGE i. The estate monitate sampled was follows:  Month  July 19  Aug 19  Sep 19  ii. The estate monitate sampled  Aug 19  Sep 19 | ted monitored river wayear. Sighted the response of the respon |          |            |



| Criterion / Indicator |   | Assessment Find      | lings                   | Complia  | ance |
|-----------------------|---|----------------------|-------------------------|----------|------|
|                       | a. Before treatment   |                      |                         |          |      |
|                       | Report ref: W1909   | 06/02                |                         |          |      |
|                       | Date of reporting:  | 23/9/2019            |                         |          |      |
|                       | Result: Conform to respective limits of National Standard for   |                      |                         |          |      |
|                       | Drinking W  | ater Quality         |                         |          |      |
|                       | b. After treatment  |                      |                         |          |      |
|                       | Report ref: W1909   | 06/03                |                         |          |      |
|                       | Date of reporting: 23/9/2019  |                      |                         |          |      |
|                       | Result: Conform to respective limits of National Standard for   |                      |                         |          |      |
|                       | Drinking W  | ater Quality         |                         |          |      |
|                       | The estates visited n sampling twice a year   |                      |                         |          |      |
|                       | a. Report ref: CK/MO  | 411/996-1/19         |                         |          |      |
|                       | Date of reporting:  | 15/5/2019            |                         |          |      |
|                       | Result: W1-W5 we  | re conform to respec | tive limits of Class II | I of     |      |
|                       | National Water Quality Standards for Malaysia   |                      |                         |          |      |
|                       | GLYE  |                      |                         |          |      |
|                       | i. The estate monitor the rainfall data on monthly basis. Sighted the sampled rainfall data as follows: |                      |                         | nted the |      |
|                       | Month   | Rainfall (mm)        | Rain days               |          |      |

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| Criterio | Criterion / Indicator  |   | Assessme          | nt Findings  | Compliance |
|----------|--|---|-------------------|--|------------|
|          |  | Jul 19  | 422               | 12   |            |
|          |  | Aug 19  | 95                | 5  |            |
|          |  | Sep 19  | 129               | 6  |            |
|          |  | ii. The estates visited monitored river water quality by conducted water sampling twice a year. Sighted the result of water analysis as follows:  a. Report ref: JPA/PP/06/600-1/11/1/255  Date of reporting: 18/3/2019 |                   |  |            |
|          |  |   |                   |  |            |
|          |  |   |                   |  |            |
|          |  | Result: W1-W2   | were conform to   | respective limits of Class III of  |            |
|          |  | Nationa   | l Water Quality S | Standards for Malaysia   |            |
|          |  |   |                   | mical mixing area, the waste water d in collection sump and recycled for |            |
| 4.5.5.2  | No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.  | No bunds were sestates.   | sighted across m  | nain rivers and waterways in both  | 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). |   |                   | water from road-side drains being<br>road side pits was observed in both | Complied   |
|          | - Minor compliance -   |   |                   |  |            |



| ndicator   | Assessment Findings  | Compliance  |
|--|--|---|
|  | Estates visited also provided houses, stores and workshop with water container for rain harvesting. The water were for activity such as chemical mixing, washing vehicle and washing clothes.  |   |
| 6: Status of rare, threatened, or endangered species and high  | biodiversity value   |   |
| ormation shall be collated that includes both the planted area alf and relevant wider landscape-level considerations (such as allife corridors). This information should cover:  Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.  Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. | The estate has conducted HCV assessment conducted by Dr. Yap Son Kheong, S.K Yap Forestry and Landscape Advisory Services and documented in report named Inventory on HCV Sites within Genting Plantations Berhad Group of Estates – Sabah Region, July 2010. HCV identified in the estates visited reported as follows:  GTGE  HCV 4 – Riparian buffer zone for Sg. Ulu Tenegang and Sg. Lyung Pisut GBGE  i. HCV 1 – 21 ha Forest Patch (Bahagia Sanctuary)  ii. HCV 4 – Riparian buffer zone for Sg. Simpang Putih and water catchment at the Forest Patch (Bahagia Sanctuary)  GLYE  i. HCV 1, 3 and 4 – Sg. Tenegang Riparian Buffer zone (Kinabatangan | Complied  |
| rare, threatened or endangered species, or high diversity value, are present, appropriate measures for nagement planning and operations should include:  | The estates visited has conducted HCV assessment conducted by Dr. Yap Son Kheong, S.K Yap Forestry and Landscape Advisory Services and documented in report named Inventory on HCV Sites within  | Complied  |
| divers<br>nagei  | sity value, are present, appropriate measures for  | sity value, are present, appropriate measures for ment planning and operations should include:  Yap Son Kheong, S.K Yap Forestry and Landscape Advisory Services and documented in report named Inventory on HCV Sites within |



| Criterio | n / Indicator  | Assessment Findings   | Compliance |
|----------|--|---|------------|
|          | protection of the species are met.  b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.  - Major compliance - | Genting Plantations Berhad Group of Estates – Sabah Region, July 2010.  RTE species identified in the estate was stated in Appendix V inventory of Flora and Fauna at the Sabah Estates.  Estates visited communicate the information regarding the HCV, RTE and conservation area with the employee through briefing and signage erected at few area in the estate.  |            |
| 4.5.6.3  | A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.  - Major compliance -  | The estates visited has established management plan for the HCV and RTE species identified in the estates as per report established. Sighted the implementation of the management plan as follows:  GTGE  i. The estate has erected signboard on prohibition illegal hunting, catching and collecting wild species, chemical application, farming and building facilities at the buffer zone area.  GBGE  i. Sighted the signage of no illegal hunting and collecting, no unauthorized entry has been erected at the boundary between the Forest and the estate field.  ii. Patrol on the HCV area has been conducted once every 2 months by the Axillary Police. Sighted the records of patrolling dated 26/10/2019, 24/8/2019 and 22/6/2019 recorded in HCV Areas Monitoring Checklist. | Complied   |



| Criterio  | n / Indicator   | Assessment Findings   | Compliance |  |
|-----------|---|---|------------|--|
|           |   | iii. The estate continuously monitored the presence of wildlife by conducting wildlife monitoring on quarterly basis. Sighted the records of wildlife monitoring dated 18/3/2019, 26/6/2019 and 24/9/2019.  |            |  |
|           |   | GLYE  |            |  |
|           | i. The estate has established and demark the boundary between buffer zone area and estate field.  |   |            |  |
|           |   | ii. The estate continuously monitored the presence of wildlife by conducting wildlife monitoring on monthly basis. Sighted the records of wildlife monitoring recorded in Monthly Monitoring for Endangered, Rare and Threatened Species for the month of June, July and August 2019.   |            |  |
|           |   | iii. Patrol on the HCV area has been conducted once every 2 months by the Field Supervisor. Sighted the records of patrolling dated 21/10/2019, 20/8/2019 and 18/6/2019 recorded in HCV Areas Monitoring Checklist.   |            |  |
| Criterion | 1 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 specific situations, as identified in regional best practice.  - Major compliance - | Genting Plantations has established ASEAN Zero Burning Policy (1999) and the Environmental Quality (Declared Activities) (Open Burning) Order 2003 signed by the President and Chief Operating Officer dated 10/8/2011. The policy was communicated to all the employee through training, briefing and signage at several notice board in the estate. | Complied   |  |
| 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  | No controlled burning application is allowed as per Zero Burning Policy   | Complied   |  |



| Criterio  | n / Indicator   | Assessment Findings  | Compliance |
|-----------|---|--|------------|
|           | there is a significant riMFM of disease spread or continuation into the next crop.  |  |            |
|           | - 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. | No controlled burning application is allowed as per Zero Burning Policy  | 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.  - Minor compliance -                                       | Genting Plantations has established Standard Operating Procedure land preparation for replanting and documented in Oil Palm Manual. Refer document no. OPM 1: Land Clearing, Preparation, Planting and Legume Cover Establishment under section Palm to Palm Replanting. All felled palm will be shredded or chip and piled between planting rows. | Complied   |
| 4.6 Princ | iple 6: Best Practices  |  |            |
| Criterion | 4.6.1: Site Management  |  |            |
| 4.6.1.1   | Standard operating procedures shall be appropriately  | The estate operations are guided by the following manuals.   | Complied   |
|           | documented and consistently implemented and monitored.  - Major compliance -  | a) Genting Plantations Oil Palm Manual OPM issued on 9/11/99 updated June 2013.  |            |
|           |   | <ul> <li>Land preparation/nursery/planting/soil conservation/</li> </ul>   |            |
|           |   | - Pest & Disease/weeding/fertiliser application/harvesting   |            |
|           |   | - Managing difficult soils/crop forecast   |            |



| Criterion | / Indicator   | Assessment Findings   | Compliance |
|-----------|---|---|------------|
|           |   | b) Sustainability Management Procedure Manual 1/8/13 revised in 7/2/19.   |            |
|           |   | c) OSH Manual dated 1/1/2010.   |            |
|           |   | d) Environmental Control Procedure – 01/9/2018  |            |
|           |   | e) Store Operating Manual – 2014  |            |
|           |   | f) Standard Operating Procedure Malaysia Estates rev 2 (Dec 10) rev 3 (Oct 13)  |            |
|           |   | g) Jobs description - 2012  |            |
|           |   | The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections   |            |
|           |   | a) OPM No 7. Manuring of oil palm   |            |
|           |   | b) OPM no 13. Managing difficult soils  |            |
|           |   | The procedures as documented in the manuals and SOPs were disseminated to the staff/workers through morning briefings and trainings. The manuals are kept in the main office for references of employees particularly for the supervisory personnel. Field inspection and interviews with the workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs. The SOPs included the operation activities from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt. |            |
| 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 | conservation. Road side pit are made to divert water at slope areas to  | Complied   |



| Criterion / Indicator |   |  | Assessme  | ent Findings     |          | Compliance |
|-----------------------|---|--|---|------------------|----------|------------|
|                       | contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.  - Major compliance -   |  | prevent road erosion and surface damage. Terraces are constructed inclined towards the terrace wall |                  |          |            |
| 4.6.1.3               | A visual identification or reference system shall be established for each field.  - Major compliance -  | All fields are marked and identified. Information i.e. year planting (field no) and the total hectare is shown in all markers. There are both stenciled at the palm trees and also displayed in signage at the boundary/corners of every field. This is observed during the field visit. Block numbers were also identified in series. |   |                  |          | Complied   |
| Criterion             | 4.6.2: Economic and financial viability plan  | I .  |   |                  |          |            |
| 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 - | •  |   |                  | Complied |            |
| 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.      | The replanting program is available for the respective estate. Sighted the program for sampled estate below;  A. Genting Tenagang Estate (GTGE)  |   |                  |          | Complied   |
|                       | - Major compliance -  | Financial<br>Year  | Field /Clone  | Total<br>Hectare |          |            |
|                       |   | 2021   | D x P (Felda)   | 283.63           |          |            |
|                       |   | 2022   | D x P (IJM)   | 729.44           |          |            |



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| Criterio | n / Indicator  | Assessment Findings   | Compliance |
|----------|--|---|------------|
|          | e) e) Financial indicators : cost benefit, discounted cash flow, return on investment  - Major compliance -  | d) FFB Forecast (MT) – 51,100.00 e) Revenue—Prepared by Genting Plantation Office Sabah  Genting Bahagia Estate (GBGE) a) Progeny/clone – D X P ( CH, etc ) b) Yield / Ha – 22.00MT c) Cost of Production – RM 180.00/Mt d) FFB Forecast (MT) – 70,567.00 e) Revenue—Prepared by Genting Plantation Office Sabah  Genting Layang Estate (GLYE) a) Progeny/clone – D X P (GH 500) b) Yield / Ha – 20.00 MT |            |
|          |  | <ul> <li>c) Cost of Production – RM 216.82 /Mt</li> <li>d) FFB Forecast (MT) – 32,088.00</li> <li>e) Revenue – Prepared by Genting Plantation Office Sabah</li> </ul>   |            |
| 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 recorded in the monthly progress report. Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein. The management also provides variance report on the performance and reviewed on a monthly basis. The supervisory personnel maintained a daily cost for the field operations.   | Complied   |



| Criterio | n / Indicator   | Assessment Findings  | Compliance |
|----------|---|--|------------|
| 4.6.3.1  | Pricing mechanisms for the products and other services shall be documented and effectively implemented.  - Major compliance - | Pricing mechanism for product and services was normally done through opened tender for comparison of quotations for CAPEX and OPEX item. So far there has been no complaint lodge by suppliers or service providers with regards to the pricing mechanism. The pricing method has been clearly stated in the contract and contractors are explained on the term of contracts prior to the signing of contract.   | Complied   |
| 4.6.3.2  | All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.  - Major compliance -  | Sighted Contract Agreement (GTGE/MOA/19/4) for drainage and road works at Genting Tenagang Estate (GTGE): Messrs. of Formasi Mutiara Sdn. Bhd has been awarded the contract of work which effective from 1 <sup>st</sup> January 2019 – 31 <sup>st</sup> January 2019 and contract agreement was signed and agreed by both parties. Verification of Contract Progress Payment Requisition form, Enter Purchase Invoice and Enter Ledger Transaction showed that the payment to the contractor was made on timely manner as per stipulated in the contract agreement.         | Complied   |
|          |   | Sighted Contract Agreement (GBGE/FFB/19/01/04) for loading and transporting works at Genting Bahagia Estate(GBGE): Messrs. of Ikhlas Maju Contractor has been awarded the contract of work which effective from 1 <sup>st</sup> January 2019 – 31 <sup>st</sup> December 2019 and contract agreement was signed and agreed by both parties. Verification of Contract Progress Payment Requisition form, Enter Purchase Invoice and Enter Ledger Transaction showed that the payment to the contractor was made on timely manner as per stipulated in the contract agreement. |            |
|          |   | Sighted Contract Agreement (GLYE/TC/19/01) for loading and transporting works at Genting Layang Estate (GLYE): Messrs. of Anugerah Runcit Trading has been awarded the contract of work which effective from 1 <sup>st</sup> January 2019 – 31 <sup>st</sup> December 2019 and contract  |            |



| Criterio  | n / Indicator  | Assessment Findings   | Compliance |
|-----------|--|---|------------|
|           |  | agreement was signed and agreed by both parties. Verification of Contract Progress Payment Requisition form, Enter Purchase Invoice and Enter Ledger Transaction showed that the payment to the contractor was made on timely manner as per stipulated in the contract agreement. |            |
| Criterion | 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. | All the contractors aware that estate is certified under MSPO. Therefore, the contractor has been instructed by estate management to follow the MSPO standard requirement.  | Complied   |
|           | - Major compliance -   | The policies were already communicated through the tender process and once contract sign by both parties. The CONTRACTOR shall be subjected to the management system audits by auditors assigned by the management as and when deemed necessary                                   |            |
| 4.6.4.2   | The management shall provide evidence of agreed contracts with the contractor.   | All the contracts in the sample estate are kept in Agreement file for further reference.  | Complied   |
|           | - Major compliance -   | Sighted the contract agreement made between Genting Tenagang Estate (GTGE) with Messrs of Formasi Mutiara Sdn. Bhd for drainage and road works. The contract Aggrement # (GTGE/MOA/19/4) valid from 01st January 2019 – 31st January 2019.  |            |
|           |  | Sighted the contract agreement made between Genting Bahagia Estate (GBGE) with Messrs of Ikhlas Maju Contractor for loading and transporting works. The contract Aggreement # (GBGE/FFB/19/01/04) valid from 01st January 2019 – 31st December 2019                               |            |
|           |  | Sighted the contract agreement made between Genting Layang Estate (GLYE) with Messrs of Anugerah Runcit Trading for loading and   |            |



| Criterio  | n / Indicator   | Assessment Findings  | Compliance |
|-----------|---|--|------------|
|           |   | transporting works. The contract Aggrement # (GLYE/TC/19/01) valid from 01st January 2019 – 31st December 2019   |            |
| 4.6.4.3   | The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.   | Genting Plantation Berhad has no objection to allow BSI auditors to verify the assessment through physical inspection if required.   | Complied   |
|           | - Minor compliance -  |  |            |
| 4.6.4.4   | The management shall be responsible for the observance of the control points applicable to the taMFMs performed by the contractor, by checking and signing the assessment of the contractor for each taMFM and season contracted.   | Sample contract and payment record verification together with interviews of estates management found that the payments has been made as per contract. The management monitored by checking and signing the assessment of the contractor for each task before the | Complied   |
|           | - Major compliance -  | payment was made.  |            |
| 4.7 Princ | iple 7: Development of new planting   |  |            |
| Criterion | 4.7.1: High biodiversity value  |  |            |
| 4.7.1.1   | Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation.  | No development of new planting at the estates visited  | NA         |
|           | - Major compliance -  |  |            |
| 4.7.1.2   | No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more | No development of new planting at the estates visited  | NA         |



| Criterior | n / Indicator  | Assessment Findings                                   | Compliance |
|-----------|--|---|------------|
|           | requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required.  |   |            |
|           | - Major compliance -   |   |            |
| Criterion | <b>4.7.2:</b> Peat Land  |   |            |
| 4.7.2.1   | New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice.   | No development of new planting at the estates visited | NA         |
|           | - Major compliance -   |   |            |
| Criterion | <b>4.7.3</b> : Social and Environmental Impact Assessment (SEIA)   |   |            |
| 4.7.3.1   | A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations.   | No development of new planting at the estates visited | NA         |
|           | - Major compliance -   |   |            |
| 4.7.3.2   | SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. | No development of new planting at the estates visited | NA         |
|           | - Major compliance -   |   |            |



| Criterio  | n / Indicator   | Assessment Findings                                   | Compliance |
|-----------|---|---|------------|
| 4.7.3.3   | The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed.  | No development of new planting at the estates visited | NA         |
|           | - Major compliance -  |   |            |
| 4.7.3.4   | Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. | No development of new planting at the estates visited | NA         |
|           | - Minor compliance -  |   |            |
| Criterion | 4.7.4: Soil and topographic information   |   |            |
| 4.7.4.1   | Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation.  | No development of new planting at the estates visited | NA         |
|           | - Major compliance -  |   |            |
| 4.7.4.2   | Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure.  | No development of new planting at the estates visited | NA         |
|           | - Major compliance -  |   |            |
| Criterion | 4.7.5: Planting on steep terrain, marginal and fragile soils  | •   | <u>'</u>   |
| 4.7.5.1   | Extensive planting on steep terrain, marginal and fragile soils   | No development of new planting at the estates visited | NA         |



| Criterio  | n / Indicator  | Assessment Findings                                   | Compliance |
|-----------|--|---|------------|
|           | shall be avoided unless permitted by local, state and national laws.   |   |            |
|           | - Major compliance -   |   |            |
| 4.7.5.2   | Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation.  | No development of new planting at the estates visited | NA         |
|           | - Major compliance -   |   |            |
| 4.7.5.3   | Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion.   | No development of new planting at the estates visited | NA         |
|           | - Major compliance -   |   |            |
| Criterion | 4.7.6: Customary land  |   |            |
| 4.7.6.1   | No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. | No development of new planting at the estates visited | NA         |
|           | - Major compliance -   |   |            |
| 4.7.6.2   | Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites.  | No development of new planting at the estates visited | NA         |



| Criterion / Indicator |   | Assessment Findings                                   | Compliance |
|-----------------------|---|---|------------|
|                       | - Minor compliance -  |   |            |
| 4.7.6.3               | Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. | No development of new planting at the estates visited | NA         |
|                       | - Major compliance -  |   |            |
| 4.7.6.4               | The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement.   | No development of new planting at the estates visited | NA         |
|                       | - Major compliance -  |   |            |
| 4.7.6.5               | Identification and assessment of legal and recognised customary rights shall be documented.   | No development of new planting at the estates visited | NA         |
|                       | - Major compliance -  |   |            |
| 4.7.6.6               | A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented.   | No development of new planting at the estates visited | NA         |
|                       | - Major compliance -  |   |            |
| 4.7.6.7               | The process and outcome of any compensation claims shall be documented and made publicly available.   | No development of new planting at the estates visited | NA         |
|                       | - Major compliance -  |   |            |



| Criterion | n / Indicator   | Assessment Findings | Compliance |
|-----------|---|---------------------|------------|
| 4.7.6.8   | Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. |                     | NA         |
|           | - Minor compliance -  |                     |            |



### MS 2530-4:2013 Part 4: General principles for palm oil mills

| Criterio  | n / Indicator   | Assessment Findings  | Compliance |  |  |
|-----------|---|--|------------|--|--|
| 4.1 Princ | 4.1 Principle 1: Management commitment & responsibility   |  |            |  |  |
| Criterion | <b>4.1.1</b> – Malaysian Sustainable Palm Oil (MSPO) Policy   |  |            |  |  |
| 4.1.1.1   | Policy for the implementation of MSPO shall be established.  - Major compliance -   | Genting Plantation Berhad has established MSPO Policy, dated 03 <sup>rd</sup> August 2009. The Policy has signed by the Mr. Yong Chee Kong, President & Chief Operating Officer dated on 03 <sup>rd</sup> August 2009.   | Complied   |  |  |
|           |   | The policy was communicated by displayed at the strategic location, induction & training, memo and meeting in POM.   |            |  |  |
| 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 -           | As per indicator 4.1.1.1 the Genting Plantation Berhad MSPO policy is emphasize on the commitment to continual improvement with the objective of improving the POM operation cover in Safety, Social and environment.  | Complied   |  |  |
| 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 - | Genting Plantation Berhad has established Sustainability Management Procedure Manual. Sighted SOP No: SMP-GPB-03 titled "Sustainable Internal Audit" dated 25 May 2018. Issue Date: 25 May 2018. The objective SOP is to Plan and Implement internal audit to determine conformance to the applicable sustainability standard's requirement of MSPO and to identify opportunities for further improvement. | Complied   |  |  |
|           |   | According to clause 6.0 - Procedure Details, all operating units are to be audited at a frequency of not less than once a year and   |            |  |  |



| Criterior | ı / Indicator   | Assessment Findings  | Compliance |
|-----------|---|--|------------|
|           |   | frequent of the audits is based on the performance of the respective OU's during the past audit.   |            |
|           |   | Annual Sustainable Internal Audit was carried out from 24 <sup>th</sup> October 2019.  |            |
|           |   | The strong and week points have been address for following scope covering;   |            |
|           |   | A. Documentation in POM  |            |
|           |   | B. Interview Session with internal stakeholder   |            |
|           |   | C. Site Visit at POM   |            |
| 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 - | Genting Plantation Berhad has established Sustainability Management Procedure Manual. Sighted SOP No: SMP-GPB-03 titled "Sustainable Internal Audit" dated 25 May 2018. Issue Date: 25 May 2018. The objective SOP is to Plan and Implement internal audit to determine conformance to the applicable sustainability standard's requirement of MSPO and to identify opportunities for further improvement. | Complied   |
|           |   | The internal audit covers effectively as required by the standard such as, documentation, interview session with internal stakeholder and site visit. Aside, also seen email correspondence between the POM and sustainability team in closing the findings with objective evidences. Sample of finding and corrective actions taken by the POM management as tabulated below;                             |            |
|           |   | A. Finding for Genting Tanjung Oil Mill (GTOM) as per tabulated below;   |            |



| Criterion / Indicator |    | Assessment Finding   | IS                      | Compliance |
|-----------------------|----|--|-------------------------|------------|
|                       | No | Non Compliance   | Status                  |            |
|                       | 1  | 4.4.2 – Major  There was sighted the rear right tyre CAT 920 is poor condition and need to change immediately  | Closed on<br>06.11.2019 |            |
|                       | 2  | 4.4.2 – Major  There was sighted improper wiring inside mill. The electric equipment or welding set direct connect to ELCB not connect on proper socket/plug   | Closed on 06.11.2019    |            |
|                       | 3  | 3.1.1 Major  According with Occupational Safety and Health (Noise Exposure) Regulation 2019 – Reg 4(8) a. The empoloyer shall cause the noise risk assessment to be revied not more than 5 years form the date of the previous noise risk assessment. GTOM has been conducted Initiall noise expourse monitoring on 14.09.2019 | Closed on 06.11.2019    |            |



| Criterio  | n / Indicator   | Assessment Findings   | Compliance |
|-----------|---|---|------------|
| 4.1.2.3   | Reports shall be made available to the management for their review.  - Major compliance -   | Annual Sustainable Internal Audit was carried out 0n 24 <sup>th</sup> October 2019. The outcome from the Internal Audit assessment is available and has been discussed in the RSPO and MSPO 3 <sup>rd</sup> Management Review Meeting Minute dated on 31 <sup>st</sup> October 2019.  | 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 - | Genting Plantation Berhad has established Sustainability Management Procedure Manual. Sighted SOP No: SMP-GPB-06 titled "Management Review". Issue Date: 25 May 2018. The objective SOP is to ensure that the Operating Unit's Sustainability Management System and Performance continue to meet the MSPO requirements and needs of the company.  RSPO and MSPO 3 <sup>rd</sup> Management Review Meeting Minutes for Part 3 and Part 4 for i. Genting Tanjung Oil Mill (GTOM), ii. Genting Tangang Estate (GTCF), iii. Genting Layang Estate (GTCF), and | Complied   |
|           |   | Tenegang Estate (GTGE), iii. Genting Layang Estate (GLYE) and Genting Bahagia Estate (GBGE) have been conducted on 31.10.2019 at GPOS 2 <sup>nd</sup> Floor Meeting Room which attended by 11 person.   |            |
|           |   | Agenda of the meeting as listed below:  |            |
|           |   | Status of outstanding issues from the previous meetings      Clause incompany and different and of the Contained like.  |            |
|           |   | 2. Change, improvements or modification of the Sustainability   |            |
|           |   | Management system  2. Internal and External audit findings on Sustainability  |            |
|           |   | Internal and External audit findings on Sustainability     Management System  |            |



| Criterion / Indicator | Assessment Findings  | Compliance |
|-----------------------|--|------------|
|                       | 4. Complaints and Grievances Book                                |            |
|                       | 5. Enquiry Register Book   |            |
|                       | 6. Stakeholder Meeting Reports / Minutes                         |            |
|                       | 7. Green-house value (specific to ISCC, MSPO & RSPO)             |            |
|                       | 8. Review Continual Improvement status & its recommendations     |            |
|                       | 9. Review on Resource & Training Requirements                    |            |
|                       | 10. Review of Sustainability Policy and its objective status     |            |
|                       | 11. Review of effectiveness in achieving quality, environmental, |            |
|                       | social, safety and health objectives                             |            |
|                       | 12. Compliance status on legal and other requirements            |            |
|                       | 13. Any other matters  |            |
|                       | 14. Preventive and Corrective Actions                            |            |
|                       | 15. Recommendations for Improvements                             |            |
|                       | 16. Customer feedback  |            |
|                       | 17. Follow up actions from management review                     |            |
|                       | 18. Change that could affect the management system               |            |



| Criterio                                | n / Indicator  |                   | Assessment 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.  - Major compliance - | consic<br>plan fo | action plan for continual improvement is bar<br>leration of the main social and environmental im<br>or respective POM as below;<br>Senting Tanjung Oil Mill (GTOM) |                    | Complied   |  |
|   |  | No                | Continues Improvement Plan Activity  | Time<br>Target     |            |  |
|   |  | 1                 | Daily monitoring on Effluent pond condition as per schedule  | To review annually |            |  |
|   |  | 2                 | Weekly monitoring of BOD for each pond   |                    |            |  |
|   |  | 3                 | Continuous desludging for anaerobic pond No 1 and 2  |                    |            |  |
|   |  | 4                 | Commissioning of stabilizing pond  |                    |            |  |
|   |  | 5                 | Monitoring performance of Bio plant  |                    |            |  |
|   |  | 6                 | To maintain water piping system in good operation condition  |                    |            |  |
|   |  | 7                 | To give awareness briefing to workers  |                    |            |  |
|   |  | 8                 | Continues recycling of sterilizer condensate for water dilution  |                    |            |  |
|   |  | 9                 | To conduct quarter inspection on water piping system for housing area  |                    |            |  |



| Criterion / Indicator |    | Assessment Findings   | Compliance |
|-----------------------|----|---|------------|
|                       | 10 | Continuous re processing of EFB                                     |            |
|                       | 11 | Weekly maintenance of EFB processing station                        |            |
|                       | 12 | EFB mulching to EFB   |            |
|                       | 13 | Conduct training for all worker                                     |            |
|                       | 14 | To conduct osha meeting   |            |
|                       | 15 | To review SOP & HIRARC  |            |
|                       | 16 | TO conduct safety in house audit                                    |            |
|                       | 17 | TO modify and replace any reported unsafe workplace                 |            |
|                       | 18 | To invite SHO to give safe awareness for worker                     |            |
|                       | 19 | Conduct awareness training for all worker                           |            |
|                       | 20 | To conduct OSHA meting after accident                               |            |
|                       | 21 | To review SOP & HIRARC after accident                               |            |
|                       | 22 | TO modify and replace any reported unsafe workplace                 |            |
|                       | 23 | To invite SHO to give safe awareness for worker after accident      |            |
|                       | 24 | Discuss with employee on the ideas of 6 engineering                 |            |
|                       | 25 | Plan and control purchase material for impellent 6 engineer control |            |



| Criterio  | on / Indicator  | Assessment Findings   | Compliance |
|-----------|---|---|------------|
| 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.  - Major compliance -                    | 26 Fabricate / Implementation of 6 engineering 27 Fabricate / implantation of 6 engineer control  The new improvement practice for mill is comply with 1. New Jadual Pematuhan for Final Effluent Discharge .BOD<18mg/l 2. Target of water consumption <1.30m3 / MT FFB 3. EFB Reprocess 50% 4. Lost Time Injury (LTI) 0 day / year   | Complied   |
| 4 2 Prine | ciple 2: Transparency   | <ol> <li>0 repeated accident in 6 months period</li> <li>To eliminate hot at work place with 6 effective engineering control in a year</li> <li>Black smoke. Operate within 20%. Not &gt; 20% 5 min in 1 hour, Not &gt; 20% 15 mm in 24 hour</li> <li>POME generated per MT FFB &lt; 85% / FFB</li> </ol>   |            |
|           | 4.2.1 – Transparency of information and documents relevant to MSPO r  | equirements   |            |
| 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 - | Genting Plantation Berhad has established Sustainability Management Procedure Manual. Sighted SOP No: SMP-GPB-25 titled "Procedures on Requests and Responses". Issue Date: 14 August 2014. The objective SOP is to define management responsibility to respond constructively and promptly to the information requested by the stakeholder with sufficient objective evidence. | Complied   |



| Criterio | n / Indicator  | Assessment Findings  | Compliance |
|----------|--|--|------------|
|          |  | Internal and External stakeholders may express their request verbally or by writing through any of the following channels  |            |
|          |  | <ul> <li>i. During any meeting</li> <li>ii. Phone</li> <li>iii. Walk in to office</li> <li>iv. Letter</li> <li>v. Email</li> <li>vi. Website</li> <li>vii. Fax</li> </ul>  |            |
|          |  | Genting Tanjung Oil Mill (GTOM) have maintained records of requests and responses, Land Titles rights, Safety and Health Plan, Plan and Impact Assessments relating to Environmental and Social Impact, Plan for Pollution Prevention, Records of Complaints and Grievances, Plan for Continuous Improvement. All the documents are make available upon request. |            |
| 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 - | The management documents which are publicly available are mentioned in Indicator 4.2.1.1. Any request of information shall be recorded in GSE's "Enquiry Register Book" (ref.: Clause 3.1.2 of the above procedure). Verification of the book showed that there has been no request made of the above mentioned subjects ever since the last assessment.         | Complied   |
|          |  | Documents listed as Publicly available are   |            |
|          |  | 1. Company Annual Report   |            |
|          |  | 2. Group Policies  |            |
|          |  | 3. Reports related to environment  |            |



| Criterio  | ı / Indicator  | Assessment Findings   | Compliance |
|-----------|--|---|------------|
|           |  | 4. MSPO external audit report   |            |
|           |  | 5. Pollution prevention plan  |            |
|           |  | 6. Continuous Improvement Plan  |            |
|           |  | 7. Complaints and Grievances book and its procedure   |            |
|           |  | 8. Negotiation and Compensation procedure   |            |
|           |  | 9. Sexual harassment procedure  |            |
|           |  | Documents listed as Confidential  |            |
|           |  | 1. Estate / Mill maps and land titles   |            |
|           |  | 2. Any reports or information related to HCV  |            |
|           |  | 3. Any reports or information related to SOCIAL   |            |
|           |  | 4. MSPO Internal Audit  |            |
|           |  | All these documents were sighted in the POM office. Requests for official documents through the POM office will have to go through the Head of Sustainability Department or Head of Department for releasing any confidential or sensitive information. |            |
| Criterion | <b>4.2.2</b> – Transparent method of communication and consultation                                |   |            |
| 4.2.2.1   | Procedures shall be established for consultation and communication with the relevant stakeholders. | Genting Plantation Berhad has established Sustainability<br>Management Procedure Manual. Sighted SOP No : SMP-GPB-17  | Complied   |
|           | - Major compliance -   | titled "Procedures for Consultation and Communication". Issue Date : 23 February 2018. The objective SOP is for the effective internal and external communication of sustainability requirements and  |            |



| Criterio | n / Indicator  | Assessment Findings   | Compliance |
|----------|--|---|------------|
|          |  | responding to communication from local communities and other affected or interested parties   |            |
|          |  | The procedure outline the process of communication on the social policies, lodging grievances and monitoring implementation. The Standard Operating Procedure (SOP) has clearly identified mechanism for consultation and communication with the relevant stakeholders.   |            |
| 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 -                  | Person in charge for consultation and communication agenda with<br>the relevant stakeholders is available. Sighted the appointment<br>letter for the person incharge with job description endorsed by<br>senior mill manager as below.  Appointed person in Genting Mill is Herman Mojiun<br>(Sustainability Coordinator)             | Complied   |
| 4.2.2.3  | A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. | Sighted update list of stakeholders for all the visited POM. The list contains numerous of stakeholders which consists of government agencies, suppliers/contractors, FFB suppliers and surrounding   | Complied   |
|          | - Major compliance -   | communities.  Minutes of meetings were available for verification. Generally, among the agenda discussed were legal compliance issues, FFB pricing mechanism, harvesting standard, safety and environmental issues, sustainability standard requirements (e.g. RSPO P&C, MSPO, ISCC) and handling of complaints/grievances mechanism. |            |



| Criterio | n / Indicator   | Assessment Findings   | Compliance |
|----------|---|---|------------|
| 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 - | Genting Plantation Berhad has established Sustainability Management Procedure Manual. Sighted SOP No: SMP-GPB-23 titled "Supply Chain, Traceability and Mass Balance". Issue Date: 23 September 2019. The objective SOP to ensure that handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. To ensure appropriate controls are in place to manage various type of certified and non-certified product according to ISCC EU, MSPO and RSPO Requirements. | Complied   |
| 4.2.3.2  | The management shall conduct regular inspections on compliance with the established traceability system.  - Major compliance -  | Inspection on compliance with the traceability procedure is regularly checked through supply chain internal audit. The internal audit report, which was carried out together with other schemes such as RSPO and ISCC, was available for verification.  | Complied   |
| 4.2.3.3  | The management shall identified and assign suitable employees to implement and maintain traceability system.  - Minor compliance -  | Person in charge to implement and maintain the traceability system is available. Sighted the appointment letter for the person incharge with job description endorsed by the Genting Tanjung Oil Mill (GTOM) manager as below.  Appointed person in Genting Tanjung Oil Mill (GTOM) is Puan Zieyanah Akang.   | Complied   |
| 4.2.3.4  | Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.  - Major compliance -  | Records of storage, sales, delivery or transportation of crude palm oil and palm kernel are maintained in various forms such as:  i. Mass Balance Worksheet – Monthly Input  ii. Local Sales Delivery Advice (LSDA)  iii. Incoming FFB Records  | Complied   |



| Criterio  | n / Indicator   | Assessment Findings   | Compliance |
|-----------|---|---|------------|
|           |   | iv. Outgoing CPO Records v. Outgoing PK Records   |            |
| 4.3 Princ | iple 3: Compliance to legal requirements  |   |            |
| Criterion | <b>4.3.1</b> – Regulatory requirements  |   |            |
| 4.3.1.1   | All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.   | The list is fully covered the requirements that related to MSPO compliance. These documents include information on laws, enforcement bodies, main requirement, environmental aspect,  | Complied   |
|           | - Major compliance -  | standard, fine, person in charge, and legal compliance checklist.  The legal compliance lists of permits/licences available in POM and being monitored and updated periodically by person in- charge of Legal Requirements. |            |
|           |   | Sighted permit / licenses being monitored and updated by Genting Tanjung Oil Mill (GTOM) as at September 2019. Sample of permit / licenses as below;  |            |
|           |   | 1. DOE Licence (Jadual Pematuhan) expiry on 30.06.2020  |            |
|           |   | 2. Boiler No. 2 expiry on 15.11.2020  |            |
|           |   | 3. Softener No. 3 expiry on 04.11.2020  |            |
|           |   | 4. Air Compressor (workshop) expiry on 04.11.2020   |            |
| 4.3.1.2   | The management shall list all relevant laws related to their operations in a legal requirements register.  - Major compliance - | Genting Plantation Berhad has established Sustainability Management Procedure Manual. Sighted SOP No: SMP-GPB-22 titled "Legal Requirement Register (LRR)". Issue Date: 19th April 2019.                                    | Complied   |



| Criterio  | n / Indicator   | Assessment Findings   | Compliance |
|-----------|---|---|------------|
|           |   | All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. The list all laws applicable to their operations in a legal requirements register is available and revision on: October 2019.             |            |
| 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.  - Major compliance - | Genting Plantation Berhad has established Sustainability Management Procedure Manual. Sighted SOP No: SMP-GPB-22 titled "Legal Requirement Register (LRR)". Issue Date: 19th April 2019.  | Complied   |
|           |   | All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. The list all laws applicable to their operations in a legal requirements register is available and up todate.                             |            |
| 4.3.1.4   | The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.  - Minor compliance - | Person in charge to monitor compliance and to track and update the changes in regulatory requirements is available. Sighted the appointment letter for the person incharge with job description endorsed by the Genting Tanjung Oil Mill (GTOM) manager as below. | Complied   |
|           |   | Appointed person in Genting Tanjung Oil Mill (GTOM) is Mr. Herman Mojiun ( Senior Mill Engineer ).  |            |
| Criterion | 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 GTPOM is located within GTJE land title in lot no. PT 93090696. The POM occupies around 9.53 ha of the total area. Any issues related to land rights will be handled by the estate management.  | Complied   |



| Criterio  | n / Indicator  | Assessment Findings   | <b>Compliance</b> 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.  - Major compliance -  | The GTPOM is located within GTJE land title. The POM occupies around 9.53 ha of the total area. Any issues related to land rights will be handled by the estate management. |                            |
| 4.3.2.3   | Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.  - Major compliance -  | The mill is separated through fencing around the vicinity. The mill is located within the host estate belonging to the same parent company and of same certification unit.  | 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). | No dispute – surrounded by other plantation companies i.e. IOI Merisem, Wingking Plantation, Ace Foremost JC Chang's Hwa Li estates.  | Complied                   |
|           | - Minor compliance -   |   |                            |
| Criterion | 4.3.3 – Customary rights   | <u> </u>  |                            |
| 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.  | No land is encumbered by customary rights.  | Complied                   |
|           | - Major compliance -   |   |                            |
| 4.3.3.2   | Maps of an appropriate scale showing extent of recognized customary rights shall be made available.  | No land is encumbered by customary rights.  | Complied                   |
|           | - Minor compliance -   |   |                            |



| Criterion / Indicator |   | Assessment Findings  | Compliance |
|-----------------------|---|--|------------|
| 4.3.3.3               | Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available.  - Major compliance -                              | No land is encumbered by customary rights.   | Complied   |
| 4.4 Princ             | ciple 4: Social responsibility, health, safety and employment co  | ondition   |            |
| 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 - | Genting Plantation Berhad has established Sustainability Management Procedure Manual. Sighted SOP No: SMP-GPB-32 titled "Procedures for Social Management". Issue Date: 2017. The objective SOP to describe the method and to provide guidance and standard procedures for the POM for followings;  i. To promote and maintain social sustainability among workers, staff, management and stakeholders  ii. To identify and manage social risks and impacts in a manner consistent with group social policy, people policy and the applicable social requirement in the sustainability | Complied   |
|                       |   | standards  iii. To facilitate implementation of the relevant social requirements and standards  Sighted latest SIA for Genting Tanjung Oil Mill (GTOM) dated on 31st October 2018.  Survey was conducted with random participants from internal and external respondents. The respondents randomly choose among  |            |



| Criterion / Indicator | Assessment Findings   | Compliance |
|-----------------------|---|------------|
|                       | workers and other stakeholders in POM. Sighted SIA carried out POM as follows;  | at         |
|                       | A. Genting Tanjung Oil Mill (GTOM)  |            |
|                       | Summary of Issues Raised by the EXTENAL Stakeholder are;  |            |
|                       | Positive Impacts Negative Impacts   |            |
|                       | Pihak Polis mengingatkan Pihak Ladang agar melaporkan nama pekerja yang lari sekurang – kurang 3 hari bagi membantu pihak polis menyediakan laporan |            |
|                       | Pihak Mill di nasihatkan agar Nil<br>memakai alat – alat<br>keselamatan semasa bekerja di<br>ladang   |            |
|                       | Semua kemalangan yang Nil<br>berlaku di dalam kilang dan<br>ladang yang melibatkan<br>elektrik wajib dilaporkan<br>kepada suruhan jaya elektrik     |            |
|                       | Pekebun kecil meminta agar Nil kilang dapat menambah masa penerimaan buah terutama ketika musin buah  |            |
|                       | Summary of Issues Raised by the INTERNAL Stakeholder are; Positive Impacts Negative Impacts   |            |

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| Criterio  | n / Indicator  | Assessment Findings   |  | Compliance |
|-----------|--|---|--|------------|
|           |  | Easy communication between GTOM mgmt.   | Anjing liar berkeliaran di<br>perumahan menggangu<br>ketenteraman pekerja dan<br>juga kantin   |            |
|           |  | Slip gaji kini dalm Bahasa<br>Melayu dan udah difahami oleh<br>pekerja  |  |            |
|           |  | Tiada isu social yang<br>dibangkitkan   | Nil  |            |
|           |  | Tiada isu yang dibangkitkan<br>untuk masalah perumahan<br>pekerja kilang GTOM   | Nil  |            |
| Criterion | <b>4.4.2:</b> Complaints and grievances  |   |  |            |
| 4.4.2.1   | A system for dealing with complaints and grievances shall be established and documented.  - Major compliance - | Management Procedure Manual. titled "Procedures for Consultation: 23rd February 2018. The objection and external communication of | has established Sustainability<br>Sighted SOP No : SMP-GPB-17<br>n and Communication ".Issue Date<br>we SOP is for the effective internal<br>sustainability requirements and | Complied   |
|           |  | responding to communications for affected or interested parties   | rom local communities and other  |            |
|           |  | SOP has outlined the  |  |            |
|           |  | Procedures and Responsi   | ibilities for Implementation   |            |
|           |  | consultation & communic   | cation Mechanism   |            |
|           |  | Guidance  |  |            |

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| Criterio | Criterion / Indicator   |   | Assessment Findings   | Compliance |  |
|----------|---|---|---|------------|--|
|          |   |   | Sighted Carta Alir Prosedur Konsultasi dan Komunikasi di antara<br>Pihak Pengrusan Ladang / Kilang Genting Plantation dengan Pihak<br>Berkepentingan.   |            |  |
| 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 - | by signatures of complaint/grievan Sighted complaint  Name of complainant Alamat  Date of complainant Issue  Tindakan | for Genting Tanjung Oil Mill (GTOM)  Nur Kamil Adii / Mohamad Fadzil  Jabatan Keselamatan dan Kesihatan ( JKKP )  7th October 2019  12 issue has been raised by the JKKP Officer. Sample of issue as beloe;  1. Tangki diesel perlu mengikut SOP penggunaan 2. Pastikan platform laluan pekerja selamt dan sebarang platform rosak perlu ditukar 3. Pastikan pressure gauge / calibration dan report perlu disediakan.  All comment has been identified | Complied   |  |
|          |   | Date action taken   | 2 <sup>nd</sup> November 2019   |            |  |



| Criterio | Criterion / Indicator   |   | Assessment Findings   | Compliance |
|----------|---|---|---|------------|
| 4.4.2.3  | A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.  - Minor compliance -               | Genting Tanjung Oil Mill (GTOM) maintains 'complaint form' and 'maintenance and repairing report' for receiving and responding to requests and complaints from employees. For Internal Stakeholder, all the complaint and grievances was record accordingly. No external stakeholders were recorded related on complaint and grievances. Review of the registers found there was no outstanding or unresolved grievance.  All internal employee and external stakeholders' can deliver their complaints and grievances directly to the management through |   | Complied   |
|          |   |   | plaints form at Office Drop Box. Sighted the complaint plaint box at the POM premise.               |            |
| 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 - |   |   | Complied   |
|          | Time: compilative   |   | iewed, POM regularly brief their workers about the ake complaints or suggestion to mill management. |            |
|          |   |   | stakeholders, similar briefing was conducted during eholder meeting.                                |            |
|          |   | Sighted Interr  | nal Meeting for Genting Tanjung Oil Mill (GTOM)   |            |
|          |   | Date  | 20 <sup>th</sup> August 2019  |            |
|          |   | Venue   | Bilik Mesyuarat GTOM  |            |
|          |   | Attendance  | 82 person   |            |



| Criterior | n / Indicator   |               | Assessment Findings  | Compliance |
|-----------|---|---------------|--|------------|
|           |   | Conducted by  | Denny Ng Leng Checak (Sustainable Coordinator)   |            |
|           |   | Agenda        | Penerangan Tentang polisi syarikat   |            |
|           |   | Sighted Exter | nal Meeting for estates and mill   |            |
|           |   | Date          | 21st October 2019  |            |
|           |   | Venue         | GTJE Club House  |            |
|           |   | Attendance    | -  |            |
|           |   | Conducted     | Mill Sustainability Department   |            |
|           |   | Agenda        | Penerangan tindakan semasa berlaku kebakaran Penerangan ringkas mengenai RSPO, MSPO and ISCC Penerangan Polisi Senarai Dokument Cara membuat Aduan dan kilanan Isu Keselamatan Kontractor CSR HCV ISU SOCIAL |            |
| 4.4.2.5   | Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. |               | ternal complaints filled, responded and the records ned for the last 24 months and available upon request  | Complied   |
|           | - Major compliance -  |               |  |            |



| Criterio  | n / Indicator   | Assessme  | nt Findings  | Compliance |  |
|-----------|---|---|--|------------|--|
| Criterion | Criterion 4.4.3: Commitment to contribute to local sustainable development  |   |  |            |  |
| 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. | to local development. The conti                                   | Genting Tanjung Oil Mill (GTOM) is committed and have contributed to local development. The contribution made to the internal and external stakeholders. As evidence, the management contributions as follow:- |            |  |
|           | - Minor compliance -  | Genting Tanjung Oil Mill (GTOM)                                   |  |            |  |
|           |   | Internal CSR  | External CSR   |            |  |
|           |   | Labour Day  | -  |            |  |
|           |   | Appreciation day for mill worker                                  | -  |            |  |
|           |   | Prizing for Internal sport competition                            | -  |            |  |
| 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 Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.  - Major compliance -                     | signed by President & Chief Ope<br>the policy stated the commitme | ched the Safety and Health Policy erating Officer dated 1/7/2018. In ent of the group to provide and to all the workers and other party es.  | Complied   |  |
|           | . iajo. compilarios   | The policy was communicated t and displayed at notice board at    | through morning briefing, training designated place in the mill.   |            |  |
|           |   | The mill has established OS implementation as follows:            | H Plan FY 2019. Sighted the  |            |  |



| Criterio | n / Indicator   | Assessment Findings  | Compliance |
|----------|---|--|------------|
|          |   | i. Annual medical surveillance was last carried out on 13/10/19 with DAB OH Sdn Bhd, OHD Reg. No. HQ/18/DOC/00/00201 for 5 workers exposed to Hexane. Overall medical surveillance report indicates that all 5 workers were fit to work.   |            |
|          |   | ii. Annual audiometric testing was carried out on 2/10/2019 by DAB OH Sdn Bhd, OHD Registration No. HQ/10/DOC/00/167. Seen the summary audiometric report with total 25 total worker tested with all workers having normal hearing result. |            |
| 4.4.4.2  | The occupational safety and health plan should cover the following:   |  | Complied   |
|          | a) A safety and health policy, which is communicated and implemented.   | signed by President & Chief Operating Officer dated 1/7/2018. The  |            |
|          | b) The riMFM of all operations shall be assessed and documented.  | policy was communicated through morning briefing, training and displayed at notice board at designated place in the mill.  |            |
|          | c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:                                      | Genting plantations has established SOP for safety and health risk assessment and documented in System Procedure: HIRARC. Refer document no. SP-MGR-01 dated 1/8/2017. GTPOM has conducted   |            |
|          | <ul> <li>i. All employees involved are adequately trained on safe<br/>working practices;</li> </ul>   | risk assessment for all the mill operations and support activities and documented the HIRARC reports.  |            |
|          | ii. All precautions attached to products should be properly observed and applied;   | The HIRARC was reviewed at minimum of once a year and when necessary. Review was conducted by the Mill Manager and ESH   |            |
|          | d) The management shall provide the appropriate PPE at the place  | Committee. Latest review was conducted on 1/6/2019.  |            |
|          | of work to cover all potentially hazardous operations as identified in the riMFM assessment and control such as Hazard Identification, RiMFM Assessment and RiMFM Control (HIRARC). | unsafe condition as the grinder was left on the floor which can  |            |



| Criterion / | Indicator   | Assessment Findings  | Compliance |
|-------------|---|--|------------|
| 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. | The mill has established training program for employees exposed to chemicals used at the palm oil mill to ensure the continuous awareness to the employee. The training was conducted by the Mill Manager and other competent person on the training subject to the supervisors and operators. Sighted the training records as follows:  i. Boiler Chemical Training dated 10/7/19 |            |
| f)          | The management shall appoint responsible person(s) for  | ii. Chemical Handling Training dated 11/7/19   |            |
|             | workers' safety and health. The appointed person(s) of trust<br>shall have knowledge and access to latest national regulations  | iii. Schedule Waste Training dated 24/10/19  |            |
|             | and collective agreements.  | iv. Chemical Drill Training dated 7/5/19   |            |
| 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.                | The mill send employee exposed with chemical for medical surveillance on annually basis. Latest medical surveillance was last carried out on 13/10/19 for 5 workers exposed to Hexane. Overall medical surveillance report indicates that all 5 workers were fit to work.  |            |
| h)          | Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.  | The mill provided appropriate PPE to all workers according to the job type. The PPE given as per HIRARC and Safe Operating Procedure. PPE issuance recodes was maintained and available to   |            |
| i)          | Employees trained in First Aid shall be present at all mill   | review.  |            |
|             | operations. First Aid equipment should be available at each worksite.   | Sighted the PPE issuance records for sampled employee as follows:  |            |
| j)          | Records shall be kept of all accidents and be reviewed  | i. E 00101   |            |
|             | periodically at quarterly intervals.  | ii. E 00128  |            |
| -1          | Major compliance -  | iii. E 00154   |            |
|             |   | iv. E 00214  |            |



| Criterion / Indicator | Assessment Findings  | Compliance |
|-----------------------|--|------------|
|                       | The management has established SOP for handling chemical and documented in the System Procedure: Chemical Management. Refer document no. SP-MGR-08 dated 1/8/2017.   |            |
|                       | Genting plantations appointed the Mill Manager as the person responsible for workers safety and health as per appointment letter dated 8/1/2018 signed by Vice President Processing – Sabah.   |            |
|                       | The mill management has established Safety and Health committee Mill management consist representatives from Employer and representatives from Employee as per appointment letter by the Mill Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting              |            |
|                       | The management conducted OSH committee meeting on quarterly basis. In the meeting discussed issue on employees' safety, health and welfare such as mill workplace audit report, accident review, first aid kit and firefighting equipment, ESH objective and target, grievances from external stakeholder and other matters.                       |            |
|                       | Sighted the minutes meeting for OSH committee dated 20/9/2018, 20/6/2019 and 23/3/2019.  |            |
|                       | Genting plantations has established accident and emergency procedure and documented in System Procedure: Emergency Response Procedure. Refer document no. SP-MGR-04 dated 1/8/2017. Interview with the workers shows the understanding regarding accident and emergency procedures in the mill. Sighted the training for ERP conducted as follows: |            |
|                       | a) Fire Extinguisher Training dated 16/11/19   |            |



| Criterio  | n / Indicator   | Assessment Findings   | Compliance |
|-----------|---|---|------------|
|           |   | j) Fire Drill Training dated 7/5/19   |            |
|           |   | i) Chemical Drill Training dated 7/5/19   |            |
|           |   | The management has appointed the engine driver as competent first aider. The engine driver has conducted in house training for first aider for various work station at the mill. The first aider responsible for first aid box at each workstation. Sighted the latest training records for first aider dated 26/10/2019. |            |
| u u       | Interview with workshop fitter and sterilizer attendant shows the understanding and awareness of the used and location of the first aid kit.  |   |            |
|           |   | The mill monitored and kept record for all accident cases and recorded in the Accident Statistic Report which submitted to the Group Safety Officer on monthly basis.   |            |
|           |   | The accident occurred was reviewed on quarterly basis during OSH committee meeting.   |            |
| Criterion | <b>4.4.5:</b> Employment conditions   |   |            |
| 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 | Genting Plantation Berhad has established Policy of Social, dated 22th June 2015. The Policy has signed by the Mr. Yong Chee Kong, President & Chief Operating Officer dated on 22th June 2015.   | Complied   |
| 1         | employees.  - Major compliance -  | Communication of all the policies to workforce is through training and to External Stakeholders through the Stakeholder Meeting.  |            |
| l         |   | The policy was displayed at the strategic location, induction & training, memo and meeting.   |            |

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| Criterio | n / Indicator  | Assessment Findings   | Compliance |
|----------|--|---|------------|
| 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.  - Major compliance - | Genting Plantation Berhad has established a Social Policy, signed by President & Chief Operating Officer dated on 22th June 2015 in order to ensure equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. Inspection of a sample of pay records and interviews of staff and workers in the POM did not identify any issues related to discrimination. | Complied   |
|          |  | Based on interview with employees from different backgrounds, there is no evidence that the management engage in or support any discriminatory practices.   |            |
|          |  | The commitment to no discrimination is also stated in the company's social policy.  |            |
| 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 -        | Pay and conditions are documented in the Workers' Contract Agreement and wage payment records / pay slip.  The salary is according to 'Guidelines on the Implementation on the Minimum Wages'. National Wages Consultative Council Act 2011 (Act 732) Malaysian minimum salary is RM1,100.00 as stated in the guidelines. Sighted Permit for Deduction of Workers Wages from Jabatan Tenaga Kerja.  | Complied   |
|          |  | Interview with both Genting Tanjung Oil Mill (GTOM) staff and workers and with both male and female confirmed that they understand the terms and conditions of their employment.  |            |



| Criterio | n / Indicator  |                       |  | Assess  | ment Findi                                     | ngs  |                    | Compliance |
|----------|--|-----------------------|--|---|--|--|--------------------|------------|
|          |  | No                    | ID   | Nationality                                       | Passport<br>Expiry<br>Date                     | Permit<br>Expiry<br>Date                             | Wages              |            |
|          |  | 1<br>2<br>3<br>4<br>5 | E00091<br>E00160<br>E00257<br>E00234<br>E00127 | Indonesia Philippine Indonesia Indonesia Malaysia | 20.06.2020<br>16.11.2022                       | 21.02.2020<br>28.05.2020<br>19.11.2019<br>29.07.2020 | 2009.76<br>2222.61 |            |
| 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. | mana                  |  | rough obtain                                      | contractors<br>ing the pay s                   |  |                    | Complied   |
|          | - Minor compliance -   | Minin<br>Act 2        | num Wages                                      | Order 2016<br>32) Malaysia                        | idelines on th<br>. National Wa<br>n minimum s | ages Consulta  | tive Council       |            |
|          |  | contr<br>2019         | actor work                                     | ers payment<br>vith national                      | orkers were<br>payslip for<br>minimum wa       | September a  | nd October         |            |
| 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 | (Lynt                 |  | the require                                       | nd maintaine<br>ed informatio                  |  |                    | Complied   |



| n / Indicator   | Assessment Findings  | Compliance  |
|---|--|---|
| full names, gender, date of birth, date of entry, a job description, wage and the period of employment.  - Major compliance -   | Sighted, the registration card being established for all workers. The registration card stated the offered position, wages implied, working hours, OT, allowances, rest day, working on holiday etc.   |   |
| 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 - | There is a Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined. Contract and agreement for workers including foreign workers and pay and conditions are documented and are above the industry minimum standard.  | Complied  |
|   | Employment contracts were available in language that understood<br>by the workers. The contract has the details about the payments<br>and employment conditions such as period of working, working<br>hour, medical assistance, housing, holiday, annual leave, period of<br>notice to terminate the contract, etc.  |   |
|   | The contract agreement is signed by both employee and employer and accompanied with respective witnesses. Workers employed consisted of local, Philippine and Indonesian.  |   |
| The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.  | Working hours is 8 hours. From Saturday to Thursday. The overtime maximum is 104 hours according to Malaysian Law.   | Complied  |
| - Major compliance -  |  |   |
| 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.           | The working hour and break time has been clearly stated in the Employment Contract.  | Complied  |
|   | full names, gender, date of birth, date of entry, a job description, wage and the period of employment.  - Major compliance -  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 -  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 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 | full names, gender, date of birth, date of entry, a job description, wage and the period of employment.  - Major compliance -  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 -  Major compliance -  Sighted, the registration card being established for all workers. The registration card stated the offered position, wages implied, working hours, OT, allowances, rest day, working on holiday etc.  There is a Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined. Contract and agreement for workers including foreign workers and pay and conditions are documented and are above the industry minimum standard.  Employment contracts were available in language that understood by the workers. The contract has the details about the payments and employment conditions such as period of working, working hour, medical assistance, housing, holiday, annual leave, period of notice to terminate the contract, etc.  The contract agreement is signed by both employee and employer and accompanied with respective witnesses. Workers employed consisted of local, Philippine and Indonesian.  Working hours is 8 hours. From Saturday to Thursday. The overtime maximum is 104 hours according to Malaysian Law.  Working hours and break time has been clearly stated in the Employment Contract. |

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| Criterior | n / Indicator  |  |   | Assess  | ment Findir   | ngs  |  | Compliance |
|-----------|--|--|---|---|---|--|--|------------|
|           | - Major compliance -   |  | ed in the (ed by both p   |   | reement the   | rate of over   | time which   |            |
|           |  |  | •   | laint receive<br>ng site inter  | d regarding p<br>view.  | ayment or for  | rced to work   |            |
| 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 -  | deduction de | ctions and med that num wage a  | net salary<br>they are b<br>and that the<br>Oil Mill (GTO   |   | er. Workers<br>according the<br>all the deduc                                    | interviewed<br>e stipulated<br>ctions being                | Complied   |
|           |  | 1<br>2<br>3<br>4<br>5                            | E00091<br>E00160<br>E00257<br>E00234<br>E00127  | Nationalit y Indonesia Philippine Indonesia Indonesia Malaysia  | 20.06.2020<br>16.11.2022  | Permit<br>Expiry<br>Date<br>21.02.2020<br>28.05.2020<br>19.11.2019<br>29.07.2020 | 2009.76  |            |
| 4.4.5.10  | Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.  - Minor compliance - | incen<br>slips.<br>worke<br>is pro<br>provie     | tives were partion the establicers and thein the individed for founded with managers. | provided by shment of control of | motorcycle a<br>the employer<br>linic provides<br>s. Education<br>ers dependent<br>accident insuler SOCSO | and verifiable<br>the medical<br>through HUM<br>s. All workers                   | e in the pay<br>care for the<br>IANA school<br>s have been | Complied   |



| Criterion | / Indicator  | Assessment Findings  | Compliance |
|-----------|--|--|------------|
|           |  | Interviews of local and foreign workers indicated satisfaction with<br>the standard of housing and facilities. Electricity and water are<br>provided without charges.  |            |
| 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 workers quarters was found to be habitable and in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446). Treated potable water and electricity were provided to the housing for free of charge.  | Complied   |
| 4.4.5.12  | The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.  - Major compliance -   | Genting Plantation Berhad has established Sexual Harassment Policy, dated 3th August 2009. The Policy has signed by the Mr. Yong Chee Kong, President & Chief Operating Officer.  The policy was communicated by displayed at the strategic location, induction & training, memo and meeting. Interviews of internal stakeholders confirmed awareness and understanding of the Policy. | 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. Employees exercising this right should not be discriminated against or suffer repercussions.  - Major compliance - | No trade union at the visited POM. Local or foreign workers are given the freedom which it is an optional for them to join worker union formed in the POM. Thus, their freedom are not restrict by mill management   | Complied   |
| 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 -  | Genting Plantation Berhad has established and implemented minimum age policy and no children below ages of 18 working in   | Complied   |

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| Criterio  | n / Indicator   | Assessment Findings   | Compliance |
|-----------|---|---|------------|
|           |   | the POM and this was proven through checking the list of employees as well as their biodata and through POM visits.   |            |
|           |   | Inspection of a sample of personnel files at the POM office confirmed recruits' ages were checked against their Identity Card for Malaysian workers or their passport in the case of foreign workers. Under-age persons were not observed at any of the work locations visited.                 |            |
| Criterion | <b>4.4.6:</b> Training and competency   |   |            |
| 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 - | GTPOM has established training program for all the employee and documented in ESH training plan. The training plan covers the mill operation, safety and health, policies, Environmental Aspects and Impacts, Environmental control procedure and etc. Sighted the training records as follows: | Complied   |
|           |   | i. Fire Extingusher Training dated 16/11/19   |            |
|           |   | ii. Waste Recycle Training dated 5/10/19  |            |
|           |   | iii. First Aid Training dated 26/10/19  |            |
|           |   | iv. Boiler Chemical Training dated 10/7/19  |            |
|           |   | v. Chemical Handling Training dated 11/7/19   |            |
|           |   | vi. Schedule Waste Training dated 24/10/19  |            |
|           |   | vii. Lockout Tagout & Permit to Work/HIRARC & Aspect Impact Training dated 22/7/19  |            |
|           |   | viii. Welding Technique & Use Oxy Acetylene Training dated 19/10/19   |            |



|   | ix. Vehicle Handling & precaution Training dated 23/7/19  |   |
|---|---|---|
|   | v. Fire Drill Training dated 7/F/10   |   |
|   | x. Fire Drill Training dated 7/5/19 xi. Training on All Company Policy & Sub Policy dated 2/1/19 xii. Chemical Drill Training dated 7/5/19  |   |
| Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific MFMill and competency required to all employees based on their job description. | The mill has conducted the training need analysis and documented in the ESH Training Plan. The analysis consist of proposed person to attend, employee designation, intended scope of training and rationale of training planned.   | Complied  |
| - Major compliance -  |   |   |
| 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 mill continuously provided the training to the workers as per plan. The training plan was reviewed on annually basis base on the training need analysis conducted.  | Complied  |
| - Minor compliance -  |   |   |
| ole 5: Environment, natural resources, biodiversity and ecosy   | stem services   |   |
| .5.1: Environmental Management Plan   |   |   |
| An environmental policy and management plan shall be in line with<br>the relevant country and state environmental laws shall be<br>established, effectively communicated and implemented.   | Genting Plantations has established Environmental Policy signed by the Chief Operating Officer dated 5/1/2009. In the policy stated the company commitment to ensure all operation are conducted in environmentally-responsible and sustainable manner.   | Complied  |
| t 0 6 - /t 6 1 - /t 6   | the planning and implementation of the training programmes in order to provide the specific MFMill and competency required to all employees based on their job description.  Major compliance -  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.  Minor compliance -  Me 5: Environment, natural resources, biodiversity and ecosy 1.5.1: Environmental Management Plan  An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be | Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific MFMill and competency required to all employees based on their job description.  Major compliance -  A continuous training programme shall be planned and implemented or ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.  Minor compliance -  Me 5: Environment, natural resources, biodiversity and ecosystem services  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.  Genting Plantations has established Environmental Policy signed by the Chief Operating Officer dated 5/1/2009. In the policy stated the comprisonmental policy and management plan and in their job function to attend, employee designation, intended scope of training and rationale of training plan was reviewed on annually basis base on the training need analysis conducted.  The mill has conducted the training Plan. The analysis consist of proposed person to attend, employee designation, intended scope of training and rationale of training plan was reviewed on annually basis base on the training need analysis conducted.  The mill has conducted the training Plan. The analysis consist of proposed person to attend, employee designation, intended scope of training and rationale of training plan. The mill continuously provided the training to attend, employee designation, intended scope of training and rationale of training plan. The mill plan. The mill plan in the ESH Training |



| Criterio | n / Indicator   | Assessment Findings   | Compliance |
|----------|---|---|------------|
| 4.5.1.2  | The environmental management plan shall cover the following:  a) An environmental policy and objectives;  b) The aspects and impacts analysis of all operations  - Major compliance - | The mill has conducted the environmental aspects and impacts analysis and documented in Environmental Aspects and Impacts Register. Refer document no. SP-MGR-02-F01-1.  Base on the environmental aspects and impacts analysis conducted, the mill has established Environmental Improvement and Management Plan. The plan stated the source of pollution, impacts, improvement/mitigation plan, data required, monitoring and action plan, person responsible and timeline.  Both documents was reviewed on annually basis. Latest review was | Complied   |
|          |   | conducted on 1/6/2019. No changes on the EAI due to no changes in mill operations since previous review.  |            |
| 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.  - Major compliance -             | Base on the environmental aspects and impacts analysis conducted, the mill has established Environmental, Safety and Health Management Program FY 2019. Both documents was reviewed on annually basis. Latest review was conducted on 1/6/2019.   | Complied   |
|          |   | Sighted the implementation of the management plans as follows:  |            |
|          |   | i. The mill monitored the Monthly BOD for treated effluent analysis result by independent laboratory to comply with new 'Jadual Pematuhan' for final discharge @ <18 mg/L. Sighted the monitoring records in Data Analysis 1 – DOE limits of "Jadual Pematuhan' for final discharge. Noted the results as todate October 2019 recorded are within limits between 7 mg/L to 18 mg/L  |            |
|          |   | ii. The mill has established target for water consumption FY 2019 at 1.35 m³/mt FFB processed and monitored the usage of water on   |            |



| Criterio | ı / Indicator  | Assessment Findings   | Compliance |
|----------|--|---|------------|
|          |  | monthly basis. As todate October 2019, average water consumption recorded at 1.05 m³/mt FFB processed.  |            |
|          |  | iii. The mill dispatch the mill byproducts, EFB at sister estate for disposal. The mill have set target to disposed 50% of the total EFB produce to be disposed. As todate October 2019, 89% of the EFB produced has been dispatch to sister estate for disposal. |            |
| 4.5.1.4  | A programme to promote the positive impacts should be included in the continual improvement plan.  | The program to promote positive impacts activities to the environment has been documented in the Continuous Improvement form. Sighted the records as follows:   | Complied   |
|          | - Minor compliance -   | i. Re-cemented back moving floor area to prevent fiber stuck at the cracked cemented that cause the square bar foundation to bring heavy load and damage  |            |
|          |  | ii. Replacement of ID fan chute to allow good discharge flue gas and prevent ash leaking from the torn plate and chute.   |            |
| 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 towards achieving objectives. | The mill has established training program for all the employee and documented in ESH training plan. The training plan covers, Environmental Aspects and Impacts, Environmental control procedure and etc.   | Complied   |
|          | - Major compliance -   |   |            |
| 4.5.1.6  | The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.   | The management has established Environmental Performance Monitoring Committee. The meeting was conducted on quarterly basis.  | Complied   |
|          | - Major compliance -   |   |            |



| The monitoring of non-renewable energy usage was conducted on monthly basis. Average diesel usage FY 2018 recorded at 0.67 ton/FFB processed.  Sighted the monitoring records per FFB processed FY 2019 as  | Complied   |
|---|--|
| monthly basis. Average diesel usage FY 2018 recorded at 0.67 ton/FFB processed.   | Complied   |
| follows:    Month   |  |
| The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets. | Complied   |
|   | Oct 0.56  The management plan to optimize the usage of non-renewable energy usage has been established and documented in the Management Plan to Improve Efficiency of Diesel Usage.  The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in |



| Criterio  | n / Indicator   | Assessment Findings  | Compliance |
|-----------|---|--|------------|
| 4.5.2.3   | The use of renewable energy should be applied where possible.  - Minor compliance -                   | The fibre and shell are used in the boiler for fuel recycled in the process system. Sighted the sample fibre usage as follows:    Month  | Complied   |
| Criterion | 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 - | The mill had identified all waste products and its source of pollution and documented in Identification, segregation and Storage of Waste. The identification was group base on the pollution source as follows: | Complied   |
|           |   | i. Workshop and mechanic area – Filters, lubricants, battery, rags, gloves, tyres, oxygen and acetylene, scrap iron  |            |
|           |   | ii. Vehicle used spare part store – Hydraulic hose, cylinders, dismantled equipment  |            |
|           |   | iii. Office and weighbridge – domestic, recyclable paper, PC and printer cartridges  |            |
|           |   | iv. Diesel Tank – Scheduled Waste  |            |
|           |   | v. Chemical Store – Containers, boxes  |            |
| 1         |   | vi. etc  |            |



| Criterior | / Indicator  | Assessment 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 efficiency and recycling potential of mill byproducts by converting them into value-added products.  - Major compliance - | The mill has established the waste management plan base on the waste identification conducted and reviewed on annually basis documented in waste management plan and Environmental, Safety and Health Management Program.  The plan stated the source of pollution, management plan, monitoring and action plan, data required and person in charge. Sighted the implementation of the management pplan as follows:  i. The mill monitored the generation of scheduled waste on monthly basis. The generation of scheduled waste recorded in the Inventory of Scheduled Waste Book and submitted to DOE through E-SWISS. Sighted and verified the monitoring records in the logbook and E-SWISS for the month of July, August and September 2019.  Sighted the Scheduled Waste disposal records as follows:  a. 25/6/2019, SW 305, C/N no. 2019063018YNU4C7  b. 25/6/2019, SW 409, C/N no. 2019063018FYLMXN  c. 25/6/2019,, SW 410, C/N no. 2019063018FYLMXN  d. 25/6/2019,, SW 323, C/N no. 201906301851VXMU  e. 25/6/2019,, SW 408, C/N no. 2019063018QK3NX1  ii. The mill dispatch the mill byproducts, EFB at sister estate for disposal. The mill have set target to disposed 50% of the total EFB produced has been dispatch to sister estate for disposal. | Complied   |



| Criterio  | n / Indicator  | Assessment Findings   | Compliance |
|-----------|--|---|------------|
| 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  - Major compliance - | Genting Plantations has established the SOP for handling of used chemicals and documented in System Procedure: Scheduled Waste. Refer document no. SP-MGR-09 dated 1/8/2017.  | Complied   |
| 4.5.3.4   | Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.  - Minor compliance -  | Domestic waste collection was done 3 times per week by GTJE and disposed at designated landfill.  | Complied   |
| Criterion | <b>4.5.4:</b> Reduction of pollution and emission  | <u>'</u>  |            |
| 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.  - Major compliance -   | The mill has conducted assessment of all polluting activities in the Environmental Aspect Impact and Environmental Impact Evaluation. A management plan has been established based on the significant aspect and DOE license compliance schedule and documented in documented in the Management Plan to Improve Efficiency of Diesel Usage. | Complied   |
| 4.5.4.2   | An action plan to reduce identified significant pollutants and emissions shall be established and implemented.  - Major compliance -   | Management plan has been established based on the significant aspect and DOE license compliance schedule and documented in documented in the Management Plan to Improve Efficiency of Diesel Usage. The plan latest review was conducted on 26/10/2019. Sighted the implementation of the management plan as follows:                       | Complied   |



| Criterio | n / Indicator   |   | As  | sessment Find                  | ings                                      |              | Compliance |
|----------|---|---|---|--------------------------------|---|--------------|------------|
|          |   |   | i. Stack Emission was conducted twice a year. Sighted the report for $1^{\rm st}$ half of 2019 as follows:  |                                |   |              |            |
|          |   | Report no.  | : MS/GTOM/2   | 019/Boiler No.3                | (S3)                                      |              |            |
|          |   | Date cond   | ucted: 28/05/1  | 19                             |   |              |            |
|          |   | Particulate   | Results: Verified the average Dust Emission Load (average Particulate, PM) for Boiler No.3 (S3) was within permissible limit of 400.0mg/Nm3 corrected at 12% CO2. |                                |   |              |            |
| 4.5.4.3  | Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.  - Major compliance - | Effluent generated were disposed through compost processed and were not permitted to discharge into any water course as prescribed under "Jadual Pematuhan".  Regular monitoring was done on monthly basis and every quarterly via "Borang Penyata Suku Tahun" to DOE for compliance. |   |                                |   | Complied     |            |
|          |   |   | • •   | uarter 2019 and                | l 2 <sup>nd</sup> quarter 201             | 19 report :- |            |
|          |   | 3 <sup>rd</sup> quarter   | 2019  |                                |   |              |            |
|          |   |   | Month Jul Aug   | Parameter  BOD pH S. Solid BOD | Results<br>17.00<br>8.4<br>56.00<br>15.00 |              |            |
|          |   |   |   | pH<br>S. Solid                 | 8.00<br>55.00                             |              |            |

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| Criterio  | n / Indicator  | Assessment Findings   |              |                                     |   | Compliance |
|-----------|--|---|--------------|-------------------------------------|---|------------|
|           |  |   | Sep          | BOD<br>pH                           | 16.00<br>7.60   |            |
|           |  | 2 <sup>nd</sup> quarte  | L<br>er 2019 | S. Solid                            | 23.00   |            |
|           |  |   | Month        | Parameter                           | Results   |            |
|           |  |   | Apr          | BOD                                 | 19.00   |            |
|           |  |   |              | pH                                  | 8.20  |            |
|           |  |   | May          | S. Solid<br>BOD                     | 29.00<br>19.00  |            |
|           |  |   | May          | pH                                  | 7.20  |            |
|           |  |   |              | S. Solid                            | 15.00   |            |
|           |  |   | Jun          | BOD                                 | 15.00   |            |
|           |  |   |              | pH<br>S. Solid                      | 7.60<br>35.00   |            |
| Criterion | <b>4.5.5:</b> Natural water resources  |   |              | 3. 30llu                            | 33.00   |            |
| 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: | in Water<br>Latest rev  | Managemen    | t Plan for Raw V<br>one on 26/10/20 | ment plan and documer<br>Vater and Drinking Wa<br>19. The objectives of | ater.      |
|           | a) Assessment of water usage and sources.  | Raw Water Treatment   |              |                                     |   |            |
|           | b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.                                       | i. To precipitate the flocs in the water and allow them to settle down at the bottom of the clarifier tank, |              |                                     |   |            |
|           | c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application,   | ii. To rem<br>solids.   | ove any imp  | urities such as ir                  | on content and susper   | nded       |

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| Criterion / Indicator   | As   | ssessment Find     | lings  | Compliance |
|---|--|--------------------|--|------------|
| maintenance of equipment to reduce leakage, collection of rainwater, etc.). | iii. To provide and supply<br>at all resident area     | ly clean and safe  | water for drinking purpose                     |            |
| - Major compliance -  | Drinking water plant                                   |                    |  |            |
|   | i. To provide and supply all resident area.            | y clean and safe   | water drinking purpose at                      |            |
|   | Sighted the implementat                                | ation of the mana  | agement plan as follows:                       |            |
|   | i. Drinking water analysis<br>the sampled analysis rec |                    | on quarterly basis. Sighted                    |            |
|   | i. Report no.: GentingTa                               | anjung/E/POM56     | 99   |            |
|   | Date sampled: 28/6/20                                  | 2019               |  |            |
|   | Date report: 17/7/201                                  | 19                 |  |            |
|   | Result: Conform with I                                 | National Standar   | rd for Drinking Water                          |            |
|   | i. Report no.: GentingTa                               | anjung/DW/N206     | 577  |            |
|   | Date sampled: 25/3/20                                  | 2019               |  |            |
|   | Date report: 3/4/2019                                  | 9                  |  |            |
|   | Result: Conform with I                                 | National Standa    | rd for Drinking Water                          |            |
|   | The monitor the water c water consumption mon          |                    | monthly basis. Sighted the FY 2019 as follows: |            |
|   |  | ater<br>Insumption |  |            |
|   | Jan 19 1.2   | 21                 |  |            |



| Criterio  | n / Indicator  |                | Assessment Findings                          |  |          |
|-----------|--|----------------|--|--|----------|
|           |  | Feb 19         | 0.91   |  |          |
|           |  | Mar 19         | 0.98   |  |          |
|           |  | Apr 19         | 1.01   |  |          |
|           |  | May 19         | 1.08   |  |          |
|           |  | Jun 19         | 1.11   |  |          |
|           |  | July 19        | 0.95   |  |          |
|           |  | Aug 19         | 1.06   |  |          |
|           |  | Sep 19         | 1.08   |  |          |
|           |  | Oct 19         | 1.10   |  |          |
|           |  | Tdate 2019     | 1.05   |  |          |
| 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. | were not permi |  | ugh compost processed and<br>nto any water course as | Complied |
|           | - Major compliance -   |                | ng was done on montl<br>ata Suku Tahun" to D | nly basis and every quarterly OE for compliance.     |          |
| 4.6 Princ | ciple 6: Best Practices  | 1              |  | ,  |          |
| Criterion | 4.6.1: Mill Management   |                |  |  |          |



| Criterio | n / Indicator   | Assessment Findings   | Compliance |
|----------|---|---|------------|
| 4.6.1.1  | Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  - Major compliance - | The SOP for the estates and mill operations are available which is prepared on Group basis. There are levels/types of the documentation identified as follows;  a) Quality, Environmental, Safety & Health & Sustainability Manual – 01/7/17  b) System Procedure – 01/1/2012  c) Procedure Manual – 02/1/2018  d) SOM Standard Operating Manual – 2013  e) Safe Operating Procedure – 01/1/2011  f) Environmental Control Procedure – 01/9/2018  The mill operations are supervised by the staff, Engineers of the Mill. In addition there are visit from the SVP and mill management team. Also from the supporting units .i.e. OSH, Sustainability | Complied   |
|          |   | Department. Compliance and performance are discussed monthly with reports submitted to the Head Office.   |            |
| 4.6.1.2  | All palm oil mills shall implement best practices.  - Major compliance -  | The monitoring of the mill process is made through the shift supervision headed by An Engineer/Executives. All process parameters are documented and summarized in a daily report. The external monitoring is made through visits i.e. SVP and the mill management team. In addition there are audits by OSH, Sustainability and Financial Audits. This is to ensure compliance to Policies, procedures in relation mill operations, financial, OSH, welfare among others being adhered.  | Complied   |



| n / Indicator   | Assessment Findings   | Compliance   |
|---|---|--|
| 4.6.2: Economic and financial viability plan  |   |  |
| A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.  - Major compliance - | Genting Tanjung Oil Mill (GTOM) has the management plan for FY19/20 with 3-year projection plan for (FY20/21, FY2021/22 and FY22/23) which include projection budget on Extraction Rates (%) on OER & KER, Capital Expenditure Budget on Buildings – Residential, Others, Plant & Machinery and Motor Vehicle.  | Complied   |
| 4.6.3: Transparent and fair price dealing   |   |  |
| Pricing mechanisms for the products and other services shall be documented and effectively implemented.  - Major compliance -   | Pricing mechanism for product and services was normally done through opened tender for comparison of quotations for CAPEX and OPEX item. So far there has been no complaint lodge by suppliers or service providers with regards to the pricing mechanism. The pricing method has been clearly stated in the contract and contractors are explained on the term of contracts prior to the signing of contract.  | Complied   |
| All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.  - Major compliance -  | Sighted Contract Agreement " Polisi Perolehan Tandan Buah Sawit (TBS) between Genting SDC Sdn Bhd with Pembekal Tanda Buah Sawit. Verification of Contract Progress Payment Requisition form, Enter Purchase Invoice and Enter Ledger Transaction showed that the payment to the contractor was made on timely manner as per stipulated in the contract agreement.  | Complied   |
|   | 4.6.2: Economic and financial viability plan  A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.  - Major compliance -  4.6.3: Transparent and fair price dealing  Pricing mechanisms for the products and other services shall be documented and effectively implemented.  - Major compliance -  All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. | 4.6.2: Economic and financial viability plan  A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.  - Major compliance -  Pricing mechanisms for the products and other services shall be documented and effectively implemented.  - Major compliance -  Pricing mechanisms for the products and other services shall be documented and effectively implemented.  - Major compliance -  All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.  - Major compliance -  Major compliance -  All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.  - Major compliance -  Major compliance -  All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.  - Major compliance -  Major compliance -  Major compliance -  All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.  - Major compliance -  Major compliance -  All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.  - Major compliance -  Major compliance -  All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.  - Major compliance -  Sighted Contract Agreement "Polisi Perolehan Tandan Buah Sawit (TBS) between Genting SDC Sdn Bhd with Pembekal Tanda Buah Sawit. Verification of Contract Progress Payment Requisition form, Enter Purchase Invoice and Enter Ledger Transaction showed that the payment to the contractor was made on timely manner as per |



| Criterio | n / Indicator  | Assessment Findings   | Compliance |  |
|----------|--|---|------------|--|
| 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. | All the contractors aware that POM is certified under MSPO. Therefore, the contractor has been instructed by POM management to follow the MSPO standard requirement.  | Complied   |  |
|          | - Major compliance -   | The policies were already communicated through the tender process and once contract sign by both parties. The CONTRACTOR shall be subjected to the management system audits by auditors assigned by the management as and when deemed necessary.  |            |  |
| 4.6.4.2  | The management shall provide evidence of agreed contracts with the contractor.  - Major compliance -   | Sighted Contract Agreement "Polisi Perolehan Tandan Buah Sawit (TBS) between Genting SDC Sdn Bhd with Pembekal Tanda Buah Sawit. Verification of Contract Progress Payment Requisition form, Enter Purchase Invoice and Enter Ledger Transaction showed that the payment to the contractor was made on timely manner as per stipulated in the contract agreement. | Complied   |  |
| 4.6.4.3  | The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.  - Minor compliance -                 | Genting Tanjung Oil Mill (GTOM) has no objection to allow BSI auditors to verify the assessment through physical inspection if required.  | Complied   |  |



#### **Section 4: Assessment Conclusion and Recommendation**

| Acknowledgement of Internal Res   | sponsibility and Formal Sign-off of   |
|---|---|
| Based on the findings during the assessment<br>Certification Unit complies with the MS 2530<br>plantations and organized smallholder and MS 2 | Genting Tanjung Palm Oil Mill and Supply Base 0-3:2013 Part 3: General principles for oil palm 2530-4:2013 Part 4: General principles for palm oil of Genting Tanjung Palm Oil Mill and Supply Base |
| Acknowledgement of Assessment Findings  | Report Prepared by  |
| Name:   | Name:   |
| ARUNAN KANDASAMY  | Muhammad Fadzli Masran  |
| Company name:   | Company name:   |
| GENTING PLANTATIONS BERHAD  | BSI Services Malaysia Sdn. Bhd.   |
| Title:  | Title:  |
| SR VICE PRESIDENT-PLANTATION  | Client Manager  |
| Signature:  WWW KANDASAMY  SENIOR TICE PRESIDENT  PLANTATION (MALAYSIA)   | Signature:  Date: 08/01/2020  |
| Date: qui xo xo   | Date: 06/01/2020  |



#### **Appendix A: Assessment Plan**

| Date  | Time          | Subjects  | MFM      | MRB    |
|---|---------------|---|----------|--------|
| Sunday<br>10/11/2019                                  | PM            | Audit Team Travelling to Sandakan   | V        | √      |
| Monday<br>11/11/2019<br>Genting                       | 08.30 - 09.00 | Opening Meeting:     Opening Presentation by Audit team leader.     Confirmation of assessment scope and finalize Audit plan  | <b>√</b> | √      |
| Tenegang<br>Estate                                    | 09.00 – 12.30 | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.   | V        | √      |
|   | 09.30 - 12.00 | Stakeholder interviews  |          | √      |
|   | 12.30 – 13.30 | Lunch   | √        | √      |
|   | 13.30 – 16.30 | Continue with document review Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices, P7: Development of New Planting (if any ) | √<br>√   | √<br>√ |
|   | 16.30 - 17.00 | Interim Closing briefing.   | √        | √      |
| Tuesday<br>12/11/2019<br>Genting<br>Bahagia<br>Estate | 08.30 - 12.30 | Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.   | V        | V      |
|   | 09.30 - 12.00 | Stakeholder interviews  |          |        |
|   | 12.30 – 13.30 | Lunch   | √        | √      |



|  | 13.30 – 16.30 | Continue with document review (MSPO part 4) P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition P5: Environment, natural resources, biodiversity and ecosystem services P6: Best practices  | √ | <b>√</b> |
|--|---------------|---|---|----------|
|  | 16.30 - 17.00 | Interim Closing briefing.   | V | √        |
| Wednesday<br>13/11/2019<br>Genting<br>Layang             | 09.00 – 12.30 | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.   | V | <b>√</b> |
| Estate   | 09.30 - 12.00 | Stakeholder interviews  |   | √        |
|  | 12.30 - 13.30 | Lunch   | √ | √        |
|  | 13.30 – 16.30 | Continue with document review Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices, P7: Development of New Planting (if any ) | √ | √<br>√   |
|  | 16.30 - 17.00 | Interim Closing briefing.   | V | <b>√</b> |
| Thursday<br>14/11/2019<br>Genting<br>Tanjung Oil<br>Mill | 08.30 – 12.30 | Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.   | V | V        |
|  | 09.30 - 12.00 | Stakeholder interviews  |   |          |
|  | 12.30 – 13.30 | Lunch   | √ | √        |



|                      | 13.30 – 16.30 | Continue with document review (MSPO part 4) P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition P5: Environment, natural resources, biodiversity and ecosystem services P6: Best practices | V | V |
|----------------------|---------------|--|---|---|
|                      | 16.30 – 17.00 | Preparation of audit report  | V | √ |
|                      | 17.00 – 17.30 | Closing Meeting  | V | √ |
| Friday<br>15/11/2019 | AM            | Audit Team travel back to Kuala Lumpur   | V | V |



#### **Appendix B: List of Stakeholders Contacted**

| List of Stakeholders Contacted   |   |  |  |  |  |
|--|---|--|--|--|--|
| Internal Stakeholders  | Union/Contractors/Local Communities   |  |  |  |  |
| Estate managers Mill engineer Supervisors, Staff & Clerks Mill local & foreign workers (process, workshop, etc.) Estate local & foreign workers (harvesters, sprayers, etc.) Local workers representatives Foreign workers representatives Gender committee representative Crèche minder Estate Hospital Assistant | Lansung Murni Sdn. Bhd. KM Enterprise Kedai Runcit MG Yu Leong Development Sdn. Bhd. Ace Foremost Sdn. Bhd. Lien Ley Hardware |  |  |  |  |
| Government Departments   | NGO   |  |  |  |  |
| Nil  | CLC   |  |  |  |  |



#### **Appendix C: Smallholder Member Details**

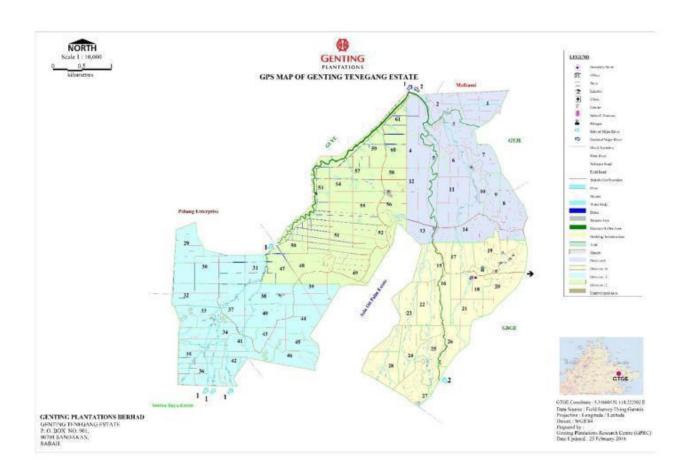
| No | Name of smallholder | Year Planted | Land Area (ha) | Forecast FFB<br>(Mt/ha/year) |
|----|---------------------|--------------|----------------|------------------------------|
| 1  | NA                  |              |                |                              |
| 2  |                  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



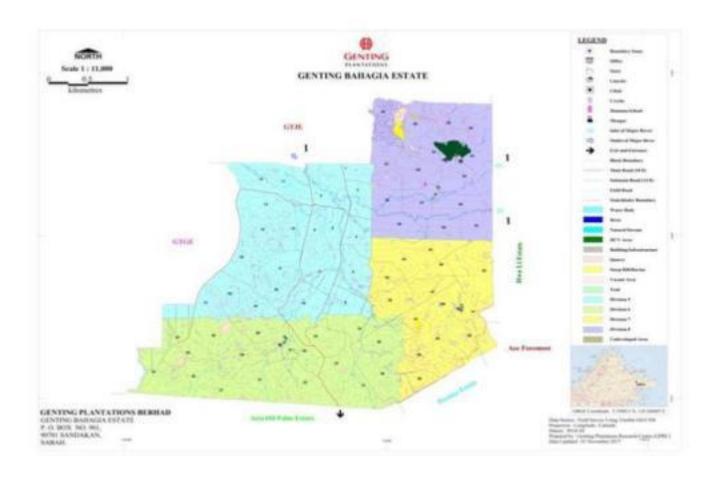
#### **Appendix F: Location and Field Map**



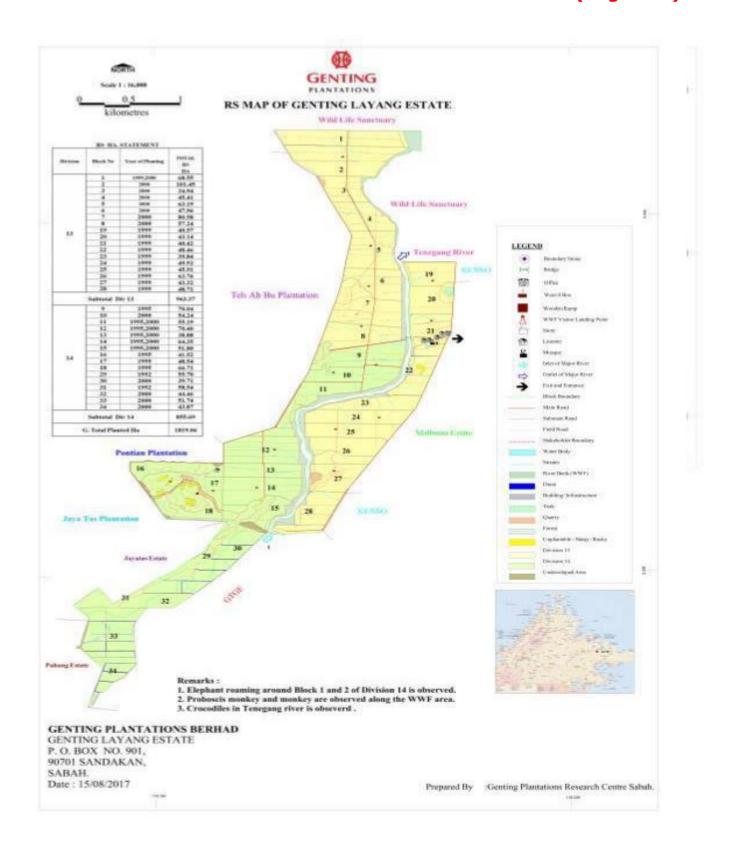














#### **Appendix G: List of Abbreviations**

BOD Biochemical Oxygen Demand

CB Certification Bodies

CHRA Chemical Health Risk Assessment COD Chemical Oxygen Demand

CPO Crude Palm Oil EFB Empty Fruit Bunch

EHS Environmental, Health and Safety
EIA Environmental Impact Assessment
EMS Environmental Management System

FFB Fresh Fruit Bunch

FPIC Free, Prior, Informed and Consent

GAP Good Agricultural Practice

GHG Greenhouse Gas

GMP Good Manufacturing Practice
GPS Global Positioning System
HCV High Conservation Value
IPM Integrated Pest Management

ISCC International Sustainable Carbon Certification

LD50 Lethal Dose for 50 sample
MSPO Malaysian Sustainable Palm Oil
MSDS Material Safety Data Sheet

MT Metric Tonnes
OER Oil Extraction Rate

OSH Occupational Safety and Health

PK Palm Kernel
PKO Palm Kernel Oil
POM Palm Oil Mill

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment

RTE Rare, Threatened or Endangered species
SEIA Social & Environmental Impact Assessment

SIA Social Impact Assessment
SOP Standard Operating Procedure