

**RSPO PRINCIPLE AND CRITERIA –  
RECERTIFICATION ASSESSMENT (RC)  
Public Summary Report**

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

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### Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0086-06-000-00	<b>Membership Approval Date</b>	14/11/2006
<b>Parent Company Name</b>	Genting Plantations Berhad		
<b>Address</b>	10th Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia		
<b>Subsidiary (Certification Unit Name)</b>	Genting Oil Mill Sdn Bhd - Genting Ayer Item Oil Mill		
<b>Address</b>	Batu 54, Jalan Johor 86100 Air Hitam, Johor, Malaysia		
<b>Contact Name</b>	Mr. Arunan Kandasamy		
<b>Website</b>	www.gentingplantations.com	<b>E-mail</b>	arunan.kandasamy@genting.com
<b>Telephone</b>	03-2333 6401	<b>Facsimile</b>	N/A

2. Certification Information			
<b>Certificate Number</b>	RSPO 653474	<b>Date of First Certification</b>	26/03/2015
		<b>Certificate Start Date</b>	26/03/2020
		<b>Certificate Expiry Date</b>	25/03/2025
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production		
<b>Applicable Standards</b>	RSPO Principles & Criteria for Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019; with Supply Chain Identity Preserved Module		

3. Other Certifications			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
MSPO 682363	MS 2530:2013 Part 4: General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	28/06/2023
MSPO 696629	MS 2530:2013 Part 3: General Principles for Palm Oil Plantations and Organised Smallholders		28/06/2023
MSPO 716638	MSPO Supply Chain Certification Standard (Segregation Module)		23/10/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Genting Ayer Item Palm Oil Mill	Ayer Item, Johor, Malaysia	1° 51' 24.2" N	103° 12' 36.0" E
Genting Kulai Besar Estate	Kulai, Johor, Malaysia	1° 36' 55.34" N	103° 36' 39.54" E
Genting Sri Gading Estate	Batu Pahat, Johor, Malaysia	1° 50' 21.49" N	103° 1' 6.02" E
Genting Sungei Rayat Estate	Batu Pahat, Johor, Malaysia	1° 54' 14.19" N	103° 00' 38.40" E
Genting Tanah Merah Estate	Tangkak, Johor, Malaysia	2° 16' 53.94" N	102° 33' 37.17" E
Genting Tebong Estate	Tebong, Melaka, Malaysia	2° 27' 20.05" N	102° 21' 38.44" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Kulai Besar Estate	2,031.52	35.06	775.48	2,842.06	71.48
Genting Sri Gading Estate	3,227.80	29.93	454.79	3,712.52	86.9
Genting Sungei Rayat Estate	2,308.20	0.18	70.60	2,378.98	97.0
Genting Tanah Merah Estate	2,049.45	46.60	146.00	2,242.05	91.4
Genting Tebong Estate	2,872.40	45.29	92.04	3,009.73	95.4
Total	12,485.22	157.06	1,543.05	14,185.33	88.0
Remarks:					
Genting Tanah Merah estate – extension scope to add Sepang division with total 441.19 ha					
Genting Tebong estate – extension scope to add Cheng division with total 792.47 ha					

6. Plantings & Cycle							
Estate	Age (Years) (Ha)					Mature** (Ha)	Immature (Ha)
	0 – 3	4 – 10	11 – 20	21 – 25	26 – 30		
Genting Kulai Besar Estate	408.49	185.08	395.37	211.54	831.04	1623.03	408.49
Genting Sri Gading Estate	581.14	430.87	614.86	575.87	1025.06	2646.66	581.14

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Genting Sungei Rayat Estate	342.38	173.24	861.54	547.98	383.06	1965.82	342.38
Genting Tanah Merah Estate	345.97	219.20	235.08	601.70	647.5	1703.48	345.97
Genting Tebong Estate	414.90	376.36	38.24	652.98	1389.92	2457.5	414.90
<b>Total</b>	2,092.88	1,384.75	2145.09	2585.92	4276.58	10392.34	2092.88

<b>7. Certified Tonnage of FFB (Own Certified Scope)</b>			
Estate	Metric Tonne/ year		
	Estimated (March 2019-Feb 2020)	Actual (March 2019 – Jan 2020)	Forecast (March 2020 – Feb 2021)
Genting Kulai Besar Estate (GKBE)	36,630.00	32,281.62	38,540.00
Genting Sri Gading Estate (GSGE)	61,700.00	47,941.27	57,560.00
Genting Sungei Rayat Estate (GSRE)	48,190.00	38,903.28	50,491.00
Genting Tanah Merah Estate (GTME)	29,830.00	24,084.20	26,765.00
Genting Tebong Estate (GTBE)	29,980.00	14,666.97	29,223.00
<b>Total</b>	206,330.00	157,877.34	202,579.00

<b>8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *</b>			
Estate	Tonnage / year		
	Estimated (mt)	Actual (mt)	Forecast (mt)
N/A	N/A	N/A	N/A
<b>Total</b>			

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b>			
Independent FFB Supplier	Tonnage / year		
	Estimated (mt)	Actual (mt)	Forecast (mt)
N/A			
<b>Total</b>			

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<b>10. Certified Tonnage</b>			
	<b>Estimated (March 2019-Feb 2020)</b>	<b>Actual (March 2019 – Jan 2020)</b>	<b>Forecast (March 2020 – Feb 2021)</b>
	<b>FFB</b>	<b>FFB</b>	<b>FFB</b>
<b>Mill Capacity: 60 MT/hr</b>	206,330 mt	157,877.34 mt	202,579 mt
<b>SCC Model: IP</b>	<b>CPO (OER: 21.15 %)</b>	<b>CPO (OER: 20.71 %)</b>	<b>CPO (OER: 21.03 %)</b>
	43,638.80 mt	32,691.78 mt	42,602.36 mt
	<b>PK (KER: 5.15 %)</b>	<b>PK (KER: 5.10 %)</b>	<b>PK (KER: 5.35 %)</b>
	10,626 mt	8,073.03 mt	10,837.98 mt

<b>11. Actual Sold Volume (CPO)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSB</b>		
<b>CPO (MT)</b>	23,867.56	8,693.31	N/A	0	32,560.87

<b>12. Actual Sold Volume (PK)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSB</b>		
<b>PK (MT)</b>	7,858.49	0	N/A	205.85	8,064.34

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

## Section 2: Assessment Process

### Certification Body:

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

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site recertification assessment was conducted from 17/02/2020 - 21/02/2020. The audit programme is included as 2.3 Assessment Plan. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out off-site assessment was conducted on 23/4/2020. This Justification is according to off-site verification due to Movement Control Order (MCO) dated 18 March until 9 June 2020 cause by N-Covid virus issue.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria's 2018 and RSPO Supply Chain Certification Standard 2017 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 approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

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

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each



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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. Prior to on-site assessment, a global stakeholder consultation has been conducted through notification dated on 27 December 2019 via website as following:

<https://www.bsigroup.com/globalassets/localfiles/en-my/rspo/Public%20Notification/2019/rspo-public-notification-recertification-genting-ayer-item-oil-mill-english.pdf>

Emails also sent to selected stakeholders among NGOs, local authorities and interested parties. No feedbacks or comments received from the global stakeholder consultation and email consultation except for on-site consultation as reported under section 3.5 of this report.

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

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

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

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification)</b>	<b>Year 2 (ASA1)</b>	<b>Year 3 (ASA2)</b>	<b>Year 4 (ASA3)</b>	<b>Year 5 (ASA4)</b>
Genting Ayer Item Oil Mill	✓	✓	✓	✓	✓
Genting Kulai Besar Estate	-	✓	-	✓	-
Genting Sri Gading Estate	✓	-	-	✓	-
Genting Sungei Rayat Estate	-	✓	-	-	✓
Genting Tanah Merah Estate	✓	-	✓	-	✓
Genting Tebong Estate	✓	-	✓	-	-

**Tentative Date of Next Visit:** January 5, 2021 - January 7, 2021

**Total No. of Mandays:** 15 mandays

**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Muhamad Naqiuddin Mazeli	Trainee Lead Auditor	He graduated with Bachelor of Science Horticulture at University Putra Malaysia. He started his career in 2009 as Researcher at Sime Darby Research Seed Centre and manage for Quality control for seed production for paddy, chilli and corn with collaboration with Malaysian Agricultural Research and Development Institute (MARDI) for 4 years. During the period, he was also involved with Nestle project on Red Rice production. He later joins the Sime Darby Plantation Berhad Sustainability Team in 2013 as Sustainability Executive. Joining the sustainability team, he managed, implemented and monitored the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training and internal audits related to RSPO, MSPO and other certifications where applicable to the operations within Sime Darby Plantation. He is a trained Safety Officer and he managed the Occupation Safety and Health of Northern Region Sime Darby Plantation Berhad operations. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health and workers consultation.
Valence Shem	Team Member	He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. Able to communicate in Bahasa Malaysia and English.
Rahayu Zulkifli	Team Member	Rahayu graduated with a Law Degree from John Moores University, Liverpool, United Kingdom in 1988. She was a practising lawyer before she joined several public listed companies as Head of Legal Department. In 2003 she joined an environmental NGO as a turtle conservationist, and in 2014 joined RSPO as Dispute Settlement Facility Manager. Rahayu is now a freelance auditor specializing in social aspects of the RSPO and MSPO standards, with audit experiences in Malaysia, Indonesia and Ghana. Rahayu successfully attended the RSPO-endorsed Lead Auditor course in 2014, ISO 14001 Lead Auditor course in 2016, the MSPO Awareness Training in 2016, and RSPO-endorsed Lead Auditor Refresher course in 2018. Additionally, Rahayu also assists in HCV assessments (in particular HCV 5 & 6), as well as carry out Social Impact Assessments. Rahayu is also a trained and certified Mediator. During this assessment, she assessed

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		on the aspects of legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English.
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**Accompanying Persons:**

No.	Name	Role
	Nil	

**2.3 Assessment Plan**

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	MN	VS	RZ
Monday, 17/2/2020	0730 - 0830	Travel from Office to Genting Sepang estate	√	√	√
	0830-0930	Genting Sepang estate: Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).</li> </ul>	√	√	√
	0930-1230	Genting Sepang estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, , etc. Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records.	√	√	√
	1230–1400	Lunch and travelling to Cheng estate	√	√	√

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	1400–1730	Genting Cheng estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, , etc. Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records.	√	√	√
	1730–1800	Interim Closing Briefing and travelling to Caspari Hotel (Tampin)	√	√	√
Tuesday 18/2/2020	0830–1300	Genting Tebong estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, , etc.	√	√	√
	1300 - 1400	Lunch Break	√	√	√
	1400-1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/ workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630-1700	Interim Closing Briefing and travelling to Ophir Hotel (Tangkak)	√	√	√
Wednesday 19/2/2020	0830–1300	Genting Tanah Merah estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, , etc.	√	√	√

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Date	Time	Subjects	MN	VS	RZ
		Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)			√
	1300 - 1400	Lunch Break	√	√	√
	1400-1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records	√	√	√
	1630-1700	Interim Closing Meeting and travelling to Maple Hotel (Batu Pahat)	√	√	√
Thursday 20/2/2020	0830–1300	Genting Seri Gading estate  Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, , etc.	√	√	√
	1300 - 1400	Lunch Break	√	√	√
	1400-1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records	√	√	√
	1630-1700	Interim Closing Meeting	√	√	√
Friday 21/2/2020	0830–1300	Genting Ayer Item POM  Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	√	√	√
	1300 - 1400	Lunch Break	√	√	√
	1400-1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records and Supply Chain requirement.	√	√	√

Date	Time	Subjects	MN	VS	RZ
	1630-1700	Closing Meeting Preparation	√	√	√
	1700-1730	Closing Meeting	√	√	√

### Section 3: Assessment Findings

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

- Genting Plantations Berhad Management Units / Time Bound Plan
- RSPO P&C 2018 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C National Interpretation MYNI 2019

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

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	Yes, All subsidiaries, estates, mills and refinery except those estates (landholdings) planned to be developed into property development ( West Malaysia)	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	The first oil mill and its supply bases were certified in 2015. As per Feb 2020, the mill and estate was certified as per TBP.	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No new acquisition as of February 2020.	Yes
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No. The group's target for 100% certification of own estates and mills remains at 2023. The group is in progress to obtain HGU for the remaining concessions.	Yes
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No lapses however re-scheduling of the certification dates has been made.	Yes
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	None	Yes

Un-Certified Units or Holdings																				
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> <li>Primary forest.</li> <li>Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	<p><u>Sabah</u></p> <p>1. Genting Kencana Estate – LUCA passed, Concept Note for Remediation and Compensation submitted to Panel. Concept Note under revision and to be re-submitted to the Panel in 1Q 2020.</p> <p><u>Indonesia</u></p> <p>1. PT SISM – LUCA passed. Concept Note and Remediation Plan submitted and approved by Panel.</p> <p>2. PT GAL – LUCA under review by RSPO.</p>	Yes																		
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	NPP for PT PALJ, PT AAC, PT UAI, PT SMA, PT KIU are in progress.	Yes																		
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>. The progress on the Liabilities shall be verified and reported.</p>	<p>No new complaint. Latest was on 2016, Based on the following: <a href="http://www.rspo.org/members/complaints/statusof-complaints/view/38">http://www.rspo.org/members/complaints/statusof-complaints/view/38</a> Complaints officially closed on 31 October 2016. From the update, RaCP status as per below:-</p> <table border="1"> <thead> <tr> <th>Unit</th> <th>RaCP status</th> <th>LUCA report status</th> </tr> </thead> <tbody> <tr> <td>PT Globalindo Agung Lestari</td> <td>Ongoing</td> <td>In progress (Clarification process)</td> </tr> <tr> <td>PT Sepanjang Inti Surya Mulia</td> <td>Completed</td> <td>Completed</td> </tr> <tr> <td>PT Agro Abadi Cemerlang</td> <td>Completed</td> <td>Completed</td> </tr> <tr> <td>Genting Jambongan Estate (GJBE)</td> <td>Ongoing</td> <td>Completed</td> </tr> <tr> <td>Genting Kencana Estate (GKCE)</td> <td>Ongoing</td> <td>Completed</td> </tr> </tbody> </table>	Unit	RaCP status	LUCA report status	PT Globalindo Agung Lestari	Ongoing	In progress (Clarification process)	PT Sepanjang Inti Surya Mulia	Completed	Completed	PT Agro Abadi Cemerlang	Completed	Completed	Genting Jambongan Estate (GJBE)	Ongoing	Completed	Genting Kencana Estate (GKCE)	Ongoing	Completed	Yes
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PT Agro Abadi Cemerlang	Completed	Completed																		
Genting Jambongan Estate (GJBE)	Ongoing	Completed																		
Genting Kencana Estate (GKCE)	Ongoing	Completed																		
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No any labour disputes occur.	Yes																		
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Based on the following: <a href="https://askrspo.force.com/Complaint/s/casetracker">https://askrspo.force.com/Complaint/s/casetracker</a> No any legal non-compliance occur.	Yes																		
Did the company conduct internal audit against the uncertified management units requirement?	Yes, The Internal audit was conducted for uncertified units on periodical basis by Sustainability Team.	Yes																		

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If yes, a positive assurance statement shall be available.	Internal audit report indicated the positive assurance has been produced.	
Have there been any stakeholder (including NGO) consultation conducted?	To-date, no comments received from stakeholders on the TBP.	Yes

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

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?  OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	No smallholder scheme. Not applicable	Complied

**3.4 Details of findings**

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

During the Recertification Assessment there were three (3) Major & two (2) Minor nonconformities raised. The Genting Ayer Item Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
<b>NCR Ref #</b>	1886372-202002-M1	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI 2019 Indicator 6.1.2 (C) (Major)
<b>Date Issued</b>	20/02/2020	<b>Due Date</b>	20/05/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	23/04/2020
<b>Statement of Nonconformity:</b>	Payment of recruitment fee by foreign workers.		
<b>Requirement Reference:</b>	Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.		



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<p><b>Objective Evidence:</b></p>	<p>As acknowledged and confirmed by the harvesting contractor Arumugam s/o Adekan, the following sampled workers from Kelemak Division, Cheng Estate have been making monthly cash payments to the said Arumugam s/o Adekan to reimburse him for costs incurred:</p> <table border="1" data-bbox="502 517 1347 1458"> <thead> <tr> <th>Worker No</th> <th>Date of payment</th> <th>Amount paid (RM)</th> </tr> </thead> <tbody> <tr> <td rowspan="4">C00465</td> <td>6 Nov 2019</td> <td>200.00</td> </tr> <tr> <td>18 Nov 2019</td> <td>120.00</td> </tr> <tr> <td>7 Dec 2019</td> <td>300.00</td> </tr> <tr> <td>8 Jan 2020</td> <td>200.00</td> </tr> <tr> <td rowspan="4">C00467</td> <td>7 Oct 2020</td> <td>200.00</td> </tr> <tr> <td>8 Nov 2019</td> <td>200.00</td> </tr> <tr> <td>7 Dec 2019</td> <td>180.00</td> </tr> <tr> <td>11 Jan 2020</td> <td>300.00</td> </tr> <tr> <td rowspan="4">C00468</td> <td>8 Feb 2020</td> <td>100.00</td> </tr> <tr> <td>9 Oct 2019</td> <td>200.00</td> </tr> <tr> <td>8 Nov 2019</td> <td>200.00</td> </tr> <tr> <td>7 Nov 2019</td> <td>100.00</td> </tr> <tr> <td rowspan="4">C00457</td> <td>11 Jan 2020</td> <td>100.00</td> </tr> <tr> <td>8 Feb 2020</td> <td>100.00</td> </tr> <tr> <td>7 Oct 2019</td> <td>200.00</td> </tr> <tr> <td>8 Nov 2019</td> <td>50.00</td> </tr> <tr> <td></td> <td>7 Dec 2019</td> <td>100.00</td> </tr> <tr> <td></td> <td>8 Jan 2020</td> <td>100.00</td> </tr> </tbody> </table>	Worker No	Date of payment	Amount paid (RM)	C00465	6 Nov 2019	200.00	18 Nov 2019	120.00	7 Dec 2019	300.00	8 Jan 2020	200.00	C00467	7 Oct 2020	200.00	8 Nov 2019	200.00	7 Dec 2019	180.00	11 Jan 2020	300.00	C00468	8 Feb 2020	100.00	9 Oct 2019	200.00	8 Nov 2019	200.00	7 Nov 2019	100.00	C00457	11 Jan 2020	100.00	8 Feb 2020	100.00	7 Oct 2019	200.00	8 Nov 2019	50.00		7 Dec 2019	100.00		8 Jan 2020	100.00
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<p><b>Corrections:</b></p>	<p>The workers misunderstood the term "RECRUITMENT COST". Actually the payment that the contractor reimbursed was for the followings:</p> <ul style="list-style-type: none"> <li>- purchase of motorcycle</li> <li>- money lending to their family before entering to Malaysia, and some personal cash loans</li> </ul>																																													
<p><b>Root Cause Analysis:</b></p>	<p>Immediately stop the reimbursement from the workers.</p>																																													
<p><b>Corrective Actions:</b></p>	<p>To stop engage contractors in order to prevent such issues in future.</p>																																													
<p><b>Assessment Conclusion:</b></p>	<p><u>Major NC off-site verification:</u>  As per document review as per below:-</p> <ol style="list-style-type: none"> <li>1. Memo to the contractors.</li> <li>2. Social management plan</li> <li>3. Continuous action plan</li> </ol> <p>Evidence shown consistency of implementation of the corrective action and verified effective to address the issue. Hence, Major NC was closed on 23/4/2020 since evidence provided sufficient for off-site verification.</p>																																													

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Non-conformity																																																														
<b>NCR Ref #</b>	1886372-202002-M2	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI 2019 Indicator 6.2.2 (C) (Major)																																																											
<b>Date Issued</b>	20/02/2020	<b>Due Date</b>	20/05/2020																																																											
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	23/04/2020																																																											
<b>Statement of Nonconformity:</b>	Workers' salary deductions for electricity and water were made without complying with the condition imposed by the Labour Office.																																																													
<b>Requirement Reference:</b>	Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.																																																													
<b>Objective Evidence:</b>	<p>Written approvals to deduct workers' wages for water and electricity were received from the Labour Office as follows: a. 12 May 2015 for Tebong Estate b. 21 Dec 2015 for Tanah Merah Estate c. 29 December 1987 and 31 Dec 2014 for Sri Gading Estate The approvals were given subject to written application from the workers. However, the following deductions were made without evidence of the workers' written applications:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Estate</th> <th>Workers' No</th> <th>Month/Year</th> <th>Water (RM)</th> <th>Electricity (RM)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Tebong</td> <td>02809</td> <td>Jan 2020</td> <td>-</td> <td>13.01</td> </tr> <tr> <td>02873</td> <td>Jan 2020</td> <td>-</td> <td>8.73</td> </tr> <tr> <td>03640</td> <td>Jan 2020</td> <td>-</td> <td>8.59</td> </tr> <tr> <td rowspan="7">Tanah Merah</td> <td rowspan="2">03128</td> <td>Dec 2019</td> <td>9.06</td> <td>6.25</td> </tr> <tr> <td>02884</td> <td>April 2019</td> <td>9.94</td> <td>12.22</td> </tr> <tr> <td></td> <td>Dec 2019</td> <td>8.81</td> <td>9.14</td> </tr> <tr> <td rowspan="2">02963</td> <td>April 2019</td> <td>8.40</td> <td>14.50</td> </tr> <tr> <td>Dec 2019</td> <td>6.40</td> <td>14.17</td> </tr> <tr> <td>02986</td> <td>Dec 2019</td> <td>-</td> <td>16.43</td> </tr> <tr> <td>02979</td> <td>Dec 2019</td> <td>4.80</td> <td>9.88</td> </tr> <tr> <td>03143</td> <td>Dec 2019</td> <td>-</td> <td>10.47</td> </tr> <tr> <td rowspan="2">Sri Gading</td> <td rowspan="2">03612</td> <td>May 2019</td> <td>2.86</td> <td>14.12</td> </tr> <tr> <td>Dec 2019</td> <td>2.86</td> <td>15.04</td> </tr> </tbody> </table>				Estate	Workers' No	Month/Year	Water (RM)	Electricity (RM)	Tebong	02809	Jan 2020	-	13.01	02873	Jan 2020	-	8.73	03640	Jan 2020	-	8.59	Tanah Merah	03128	Dec 2019	9.06	6.25	02884	April 2019	9.94	12.22		Dec 2019	8.81	9.14	02963	April 2019	8.40	14.50	Dec 2019	6.40	14.17	02986	Dec 2019	-	16.43	02979	Dec 2019	4.80	9.88	03143	Dec 2019	-	10.47	Sri Gading	03612	May 2019	2.86	14.12	Dec 2019	2.86	15.04
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		Jan 2020	2.86	16.79
	03578	Dec 2019	2.86	0.87
		Jan 2020	2.86	0.22
	03766	May 2019	2.86	14.12
		Dec 2019	2.86	10.03
		Jan 2020	2.86	10.03
	C00188	May 2019	1.64	3.44
		Dec 2019	3.29	12.97
		Jan 2020	3.29	14.84
	02561	May 2019	11.42	111.62
		Dec 2019	11.42	74.12
		Jan 2020	11.42	89.82
<b>Corrections:</b>	<p>Management misunderstood that the following clause in the employment agreement (which had been explained during the Induction Training) had covered the requirement for the workers consent letter for any deductions on water and electricity:</p> <p><i>Clause 21 - Pemotongan Gaji: PEKERJA bersetuju untuk dipotong gajinya mengikut persetujuan yang dilakukan bersama pihak PEKERJA dan MAJIKAN sesuai dengan Akta Kerja 1955 dan Perundangan Malaysia.</i></p>			
<b>Root Cause Analysis:</b>	<p>Immediately get written approval from all workers concerned for deductions made from their date of employment, until end of employment.</p>			
<b>Corrective Actions:</b>	<p>Standard workers consent letter (using the workers mother tongue language) will be attached together with the employment agreement, which will be briefed during the Induction Training before signed by the workers.</p>			
<b>Assessment Conclusion:</b>	<p><u>Major NC off-site verification:</u>            As per document review as per below:-</p> <ol style="list-style-type: none"> <li>1. Record of Signed concerned letter for existing workers – GSGE, GTME &amp; GTBE</li> <li>2. Record of Standard workers consent letter for new workers (to be attached with the employment agreement)</li> </ol> <p>Evidence shown consistency of implementation of the corrective action and verified effective to address the issue. Hence, Major NC was closed on 23/4/2020 since evidence provided sufficient for off-site verification.</p> <p>This Justification is according to off-site verification due to Movement Control Order (MCO) dated 18 March until 14 April 2020 cause by N-Covid virus issue.</p>			

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Non-conformity			
<b>NCR Ref #</b>	1886372-202002-M3	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI 2019 Indicator 7.8.2 (C) (Major)
<b>Date Issued</b>	20/02/2020	<b>Due Date</b>	20/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	23/04/2020
<b>Statement of Nonconformity:</b>	Riparian zone was not satisfactorily maintained according to the company's procedure [Riparian Buffer Zone Management, doc. No. SMP-GPB-14, rev. 1, dated 14/8/2014].		
<b>Requirement Reference:</b>	Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).		
<b>Objective Evidence:</b>	Based on site visit at field no. 96 at See Kee Division, Tebong Estate, traces of herbicides application within the riparian zone was seen.		
<b>Corrections:</b>	The workers still followed the old markers which is not valid, after the drain was desilted by the government. The desilting had caused the width of the drain changed to more wider.		
<b>Root Cause Analysis:</b>	The new buffer zone marking was done, and the staff in-charge and the workers were briefed on the Riparian Zone Management.		
<b>Corrective Actions:</b>	To monitor the width of the 'new' drain after every future desilting by the government.		
<b>Assessment Conclusion:</b>	<p><u>Major NC off-site verification:</u>            As per document review as per below:-</p> <ol style="list-style-type: none"> <li>1. Record of Training record – riparian buffer zone management.</li> <li>2. Picture of buffer zone</li> </ol> <p>Evidence shown consistency of implementation of the corrective action and verified effective to address the issue. Hence, Major NC was closed on 23/4/2020 since evidence provided sufficient for off-site verification.            This Justification is according to off-site verification due to Movement Control Order (MCO) dated 18 March until 14 April 2020 cause by N-Covid virus issue.</p>		

Non-conformity			
<b>NCR Ref #</b>	1886372-202002-N1	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI 2019 Indicator 6.7.4 (Minor)
<b>Date Issued</b>	20/02/2020	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Found some workers inadequately covered by accident insurance.		
<b>Requirement Reference:</b>	All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.		

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<b>Objective Evidence:</b>	Sighted accident record JKPP 6 for Dedi Alpan (Socso id: 201900647671) dated 28 June 2019. The LTI for this cases shows 20 days however found the payment voucher (E1202870/2019) from SOCSO only cover 15 day.  The salary from date 1 July 2019 until 5 July was not covered by the employer or SOCSO.		
<b>Corrections:</b>	To pay the 5 days salary (for period 1st – 5th Jul 2019) in the February 2020 salary.		
<b>Root Cause Analysis:</b>	The salary was not paid because the Medical Certificate (MC) issued by the Hospital was only for period 29th June to 5th July 2019.		
<b>Corrective Actions:</b>	To ensure any hospitalise Sick Leave due to accident during working hours to be paid or covered under SOCSO in line with the reported Loss Time Injury (LTI).		
<b>Assessment Conclusion:</b>	Corrective action plan accepted. Evidence of its effectiveness to be verified in next assessment.		
<b>Non-conformity</b>			
<b>NCR Ref #</b>	1886372-202002-N2	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI 2019 Indicator 7.4.1(Minor)
<b>Date Issued</b>	20/02/2020	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	“Open”
<b>Statement of Nonconformity:</b>	The fertilizer applied at the field was not in accordance to agronomist recommendation.		
<b>Requirement Reference:</b>	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimize yield and minimize environmental impacts.		
<b>Objective Evidence:</b>	At Sri Gading Estate, the agronomist has recommended to apply 14.45 mt of ammonium chloride (AC) fertilizers at field no. P00C in year 2019. However, based on the records from the Lintramax system and store bin card, the amount applied was only 10.80 mt.		
<b>Corrections:</b>	To obtain written advise/approval from the Agronomist on the recommendation for applications at flood/water logging areas, and safe keep it for future reference and audit purpose.		
<b>Root Cause Analysis:</b>	The field OP 00C is a flood/water logged area. Therefore, the fertilizer was not applied as per the Agronomist recommendation		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>To ensure appropriate remarks (ie reason for shortage of application) are written at the manuring costing book and manuring programme for those fields affected by flood/water log issue – as recommended by the Agronomist.</li> <li>To ensure the written approval by the Agronomist kept properly for audit purpose.</li> </ol>		
<b>Assessment Conclusion:</b>	Corrective action plan accepted. Evidence of its effectiveness to be verified in next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Good Cooperation with certification unit and good hospitality

**3.4.1 Status of Nonconformities Previously Identified and Observations**

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1740419-201902-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.1.3 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	24/4/2019
<b>Statement of Nonconformity:</b>	Plans for avoidance or mitigation of impacts related to absconded workers issues were not adequate.		
<b>Requirement Reference:</b>	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.		
<b>Objective Evidence:</b>	GSRE & GTBE: Records of workers in 2018 shown a total of 22 & 25 absconded foreign workers in GSRE and GTBE respectively. External stakeholders consulted in GTBE complaining that few of those absconded workers even left big amounts of unpaid groceries debts. These absconded foreign workers issue might potentially lead to local and national social issues.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Ensure workers aware on the implication of blacklisted by the authorities should they not return after taken leave.</li> <li>- Schedule for consultations session and advice. And follow-up session to ensure workers feel that they are taken care and their problems are solved.</li> <li>- To train immediate mandore/supervisor to act as eyes and ears of management in detecting workers' intent to move before it happens and notify management in advance to take preventive actions.</li> <li>- To brief workers on implication of indiscipline towards their performance and future impact.</li> <li>- Immediately deport unfit workers upon documentations.</li> </ul>		
<b>Assessment Conclusion:</b>	Recertification verification: As per verification of record such as records of briefing to workers, records of consultation session, records of briefing to mandores & supervisors and records of unfit workers deported immediately upon receiving medical report was		

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	updated and recorded accordingly. This confirmed that no recurrence of issue. Hence, Major NC remained closed.
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Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1740419-201902-M2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.1.1 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	24/4/2019
<b>Statement of Nonconformity:</b>	a) The total tonnage of the approved limit was not complied with. b) The requirement of chemicals containers labelling was not in accordance to OSH CLASS Regulation 2013.		
<b>Requirement Reference:</b>	Evidence of compliance with relevant legal requirements shall be available.		
<b>Objective Evidence:</b>	a) GAIOM - The total FFB processed in the entire year 2018, (1/2/18 – 31/1/19) is 196358.23 mt exceeding 4358.23 mt equivalent to 2.27 % of the approved quantity of 192000 mt. b) GSRE – there was no labelling made at the chemical containers storing the balance chemicals at the pre-mixing area.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Monthly monitoring to ensure received crop does not exceed the approved limit.</li> <li>- Storekeeper and Assistant Manager in charge to ensure all premix chemical used must have correct labelling through daily inspection at the balance chemical store.</li> <li>- Re-training of storekeeper on chemical handling, mixing and labelling to be conducted by chemical supplier</li> </ul>		
<b>Assessment Conclusion:</b>	Recertification verification: As site verification on FFB processing record was less than MPOB license approved quantity. On site visit at spraying activities and chemical mixing area the chemical container was labeled. This confirmed that no recurrence of issue. Hence, Major NC remained closed.		

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1740419-201902-N1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.6.10 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20/02/2020
<b>Statement of Nonconformity:</b>	Disposal of waste material according to procedures not fully demonstrated being understood by workers.		
<b>Requirement Reference:</b>	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated.		
<b>Objective Evidence:</b>	GAIOM: Seen domestic waste not properly dumped in bins and scattered on the ground in front of Block E workers quarters. Found also 2 pieces of fluorescent lamps (SW) in the domestic bin in front of Block A workers quarters. Recycle bins in front of office not being although recyclable waste found inside non-recycle bin.		

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<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- To train all the workers and residents on domestic &amp; recyclable waste management and continuously follow up.</li> <li>- Amend mill's Scheduled Waste procedure to include the electronic waste (SW110).</li> <li>- To train all the workers and management personnel on the electronic waste management.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Recertification verification:          Based on site visit at workers quarters, there was no more domestic wastes nor scheduled wastes indiscriminately dumped. Among the documents verified were:          1) training records on wastes management dated 24/6/2019 and 16/8/2019          2) consignment notes to show that electronic wastes have been disposed through authorized collector          3) Scheduled Wastes procedure to show that the handling of electronic wastes had been included</p> <p>The corrective actions found to be adequate to close the NCR. Nonetheless, the continuous effective implementation shall be carried out in the next assessment.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	<b>1740419-201902-N2</b>	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.1.3 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20/02/2020
<b>Statement of Nonconformity:</b>	The requirement of A4 Electrical Charginan Competent Person (at Mill) was not addressed as per Electricity Supply Act 1990.		
<b>Requirement Reference:</b>	A mechanism for ensuring compliance shall be implemented		
<b>Objective Evidence:</b>	GAIOM: Found that no A4 Charginan was made available at Ayer Item Palm Oil Mill.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- To ensure the mill's wireman complete the full competency course until obtain competency for A4.</li> <li>- To approach relevant channel and media for future replacement especially on competent person ie to join any career carnival organized by Jabatan Tenaga Kerja, online advertising ie Job Street etc.</li> </ul>		
<b>Assessment Conclusion:</b>	<p>Recertification verification:          As per verification, the management already approach relevant channel and media for future replacement especially on competent person such as JobMalaysia 2.0 on 29 Sept 2019 and also in Jobstreet. The management also sent the employee to exam and course to get A4 charge men, the process in progress. The corrective actions found to be adequate to close the NCR. Nonetheless, the continuous effective implementation shall be carried out in the next assessment.</p>		

Opportunity for Improvement	
OFI#	Description
<b>OFI 1</b>	NIL



### 3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1740419-201902-M1	Major	6.1.3	15/02/2019	Closed out on 24/04/2019
1740419-201902-M2	Major	2.1.1	15/02/2019	Closed out on 24/04/2019
1740419-201902-N1	Minor	4.6.10	15/02/2019	Closed out on 20/02/2020
1740419-201902-N2	Minor	2.1.3	15/02/2019	Closed out on 20/02/2020
1886372-202002-M1	Major (C)	6.1.2	20/02/2020	Closed out on 23/04/2020
1886372-202002-M2	Major (C)	6.2.2	20/02/2020	Closed out on 23/04/2020
1886372-202002-M3	Major (C)	7.8.2	20/02/2020	Closed out on 23/04/2020
1886372-202002-N1	Minor	6.7.4	20/02/2020	"Open"
1886372-202002-N2	Minor	7.4.1	20/02/2020	"Open"

### 3.5 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Genting Ayer Item Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

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

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

List of Stakeholders contacted	
<b>Internal Stakeholders</b> Field workers Mill workers NUPW representative Gender committee	<b>Union/Contractors/Local Communities</b> Groceries shop representative EFB transporter contractor HUP The Hardware S/B Penternak Parit Kasih Batu Pahat Kg Paya Mas representative Ong Sian Lim (Smallholder) Kg Hilir Cawangan Awam Representative

<b>Government Departments</b> Nil	<b>NGO</b> Nil
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Stakeholders comment	
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<b>1</b>	<p><b>Issues:</b> Some contractors informed that they don't fully understand the detailed terms and conditions of the contracts entered into with the estates because the contracts were prepared in English; a language which they are not proficient in. What is important is that the contract price is clearly stated. The contractors indicated their preference for a contract in Bahasa Malaysia. But due to the long-standing business relationship, there has been no issues.</p> <p><b>Management Responses:</b> Management noted the comments given by contractors. The Management will explore the possibility of preparing a Bahasa Malaysia version of the contract, so that the contractors fully understand the detailed terms and conditions.</p> <p><b>Audit Team Findings:</b> Contractors were not briefed of all the terms of the contracts. Only the following issues were briefed in detail:</p> <ul style="list-style-type: none"> <li>- Job scope</li> <li>- Duration of the contract</li> <li>- Payment terms</li> </ul>
<b>2</b>	<p><b>Issues:</b> Village Head of Kg Paya Mas informed that although the village has been around earlier than the establishment of Tanah Merah Estate, there has been no cases of land encroachment, or land disputes. Several of the villagers are employed at the Tanah Merah Estate Villagers and estate community live in harmony.</p> <p><b>Management Responses:</b> Noted the stakeholder's comments.</p> <p><b>Audit Team Findings:</b> No further issue.</p>
<b>3</b>	<p><b>Issues:</b> Neighbouring smallholder at Tanah Merah Estate confirmed that boundary markings are clearly demarcated, and there are no overplanting or encroachments. Receive stakeholder meeting invitations, but most of the time cannot attend due to other matters. No issue with the estate.</p> <p><b>Management Responses:</b> Noted the stakeholder's comments.</p> <p><b>Audit Team Findings:</b> No further issues.</p>
<b>4</b>	<p><b>Issues:</b> Sekolah Agama Sri Maju Jaya is located within the Genting Ayer Item Mill premises. The pupils are mostly employees' children, as well as those from nearby communities. The Mill has been very supportive in providing looking into requests made by a hut where pupils can use while waiting for the bus. The Mill also provides security services to the school. The teacher had also attended stakeholder meetings where briefings on company code of ethics, company policies, complaint procedure, were given. Hope that this good relationship will continue.</p> <p><b>Management Response:</b> Noted the stakeholder's comments.</p> <p><b>Audit Team Findings:</b> No further issues.</p>
	<p><b>Issues:</b></p>

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5	All other contractors and suppliers confirmed that contract are fair, and that payments are received in less than one month from date of invoice. Estates and Mill do call for stakeholder meetings and brief about RSPO, MSPO, safety, company ethics, no bribery, child policy, and importance about complying with the laws. They know who to lodge complaints to, if any. So far, there are no issues. Sometimes there are minor discrepancies in payment, but this seldom happens, and even so, are settled amicably.
	<b>Management Responses:</b> Noted the comments given by stakeholder.
	<b>Audit Team Findings:</b> No further issues.
6	<b>Issues:</b> Sundry shop and canteen sell daily and food items to the workers who live at the linesite. Workers pay either by cash or on credit at the same price. Previously there were cases of workers leaving without paying their debts, but this has stopped. So far there are no issues.
	<b>Management Responses:</b> Noted comments from stakeholders. Briefings have been done to workers on the need to settle their debts with the estate sundry shops before going back to their home countries.
	<b>Audit Team Findings:</b> Verified during the audit that briefings were given to the workers on the legal implications of not paying debts before leaving. Workers are required to settle all outstanding sums before going home.
7	<b>Issues:</b> Women & Children Committees informed that they have meetings every 3 to 4 months to find out if any members have any issue related to sexual harassment or abuse, and if there is, how to make complaints. The meetings are also used to create awareness on sexual harassment, reproductive rights, domestic violence. So far there is no report on sexual harassment or domestic violence received. Female workers who have given birth before also confirmed that estate/mill management allow them time off during office hours to breastfeed, and a private room is provided. members discuss issues such as WoW (Gender Committee) representative from the Mill informed that there are about 70 ++ members comprising employees and employees' wives. They have a meeting once every 3 months Further dissemination of information is also done via WhatsApp group, and face-to-face meetings.
	<b>Management Responses:</b> Noted comments from stakeholders.
	<b>Audit Team Findings:</b> Meeting minutes if Women and Children committee were reviewed during the audit. No further issues.
8	<b>Issues:</b> Cow owners confirmed that there are no issues with the estates. The cows are allowed to graze in the estates, provided they do not go to where the young palms are.
	<b>Management Response:</b> Confirmed what the car owners say. No further issues.
	<b>Audit Team Findings:</b> There is no evidence of any conflict between the car owners and the estates. No further issues.

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Genting Sri Gading Estate	37 years	3047.60 ha	Yes	No	Yes, compliance verified. Agreement with the previous owner Ko Rubber Plantations (PTE) LTD

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Genting Tanah Merah Estate	37 years	152.8295 ha	Yes	No	Yes, compliance verified. Agreement with the previous owner Ko Rubber Plantations (PTE) LTD
Genting Tebong Estate	37 years	225.2061 ha	Yes	No	Yes, compliance verified. Agreement with the previous owner Ko Rubber Plantations (PTE) LTD
Genting Ayer Item Oil Mill	37 years	446.3676 ha	Yes	No	Yes, compliance verified. Agreement with the previous owner Ko Rubber Plantations (PTE) LTD


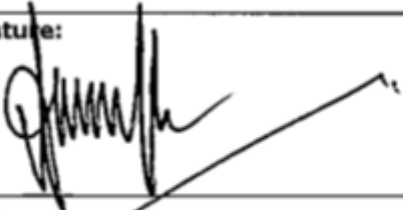
Previous land owner / user comment	
	<b>Feedbacks:</b> The previous land owner cannot be reached and tracked. KO RUBBER PLANTATIONS (PTE.) LIMITED (the "Company") The Company is a PRIVATE COMPANY LIMITED BY SHARES and it's current entity status is Cancelled.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No other issue

**3.6 Impartiality and conflict of interest**

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

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

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Genting Ayer Item Oil Mill Certification Unit has complied with the RSPO P&C MY-NI 2019 and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Genting Ayer Item Oil Mill is approved and continued.

<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> Muhamad Naquiddin Mazeli	<b>Name:</b> Arunan Kandasamy
<b>Company Name:</b> BSI Services Malaysia Sdn Bhd	<b>Company Name:</b> Genting Plantations Berhad
<b>Title:</b> Lead Auditor	<b>Title:</b> SVP Plantation (Malaysia)
<b>Signature:</b> 	<b>Signature:</b> 
<b>Date:</b> 7 May 2020	<b>Date:</b> 8 May 2020

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1</b>			
The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Major compliance -</p>	<p>All documents required by this indicator are made publicly available to all stakeholders. Genting Plantations Berhad require them to fill in the Enquiry Register Book in order to access the documents. The Corporate Department will ensure that the requested documents made available do not impinge on confidentiality and will not cause detrimental sustainability or negative social outcomes.</p> <p>Sustainability Report and Annual Report are published annually and made publicly available at website: <a href="http://www.gentingplantations.com">www.gentingplantations.com</a>.</p> <p>In addition to the website, the policies were also seen displayed at various locations at the operating units including the main notice boards of the estates and mill offices notice boards for employees and visitors to view.</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>The information was available in 2 language English and Malay. This document was accessible to stakeholder upon requested.</p>	Complied
1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.</p> <p>- Major compliance -</p>	<p>The record of request was available under complaint and grivances record book, latest record sighted 13 Feb 2020 referred letter SJKTLB/GSE.2020(1). The response record was on 14 Feb 2020 by Management. Effectively implemented. (Ref. No 042)</p>	Complied

1.1.4	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Major compliance -</p>	<p>Consultation and communication procedure are documented, SMP-GPB-17 dated 23 Feb 2018 title : Procedure for consultation and communication. The procedure communicated on 26 Nov 2019 during stakeholder meeting.</p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>Stakeholder list was available for all estate and mill and updated. This stakeholder was include interested party, authorities, smallholder, villagers, and others.</p>	Complied
<p><b>Criterion 1.2</b>  The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>The Genting Ayer Item POM and supply base subscribe to Genting Plantations' Ethical Conduct and Integrity Policy dated 22 June 2015 which was signed by the President &amp; Chief Operating Officer of Genting Plantations. The Policy states that all employees of the Group are expected to adhere to the following values:</p> <ul style="list-style-type: none"> <li>- respect for refrain from all forms of corruption, bribery and fraudulent use of funds and resources;</li> <li>- fair conduct of business;</li> <li>- full, fair and accurate disclosure of relevant facts in all reports and documents dealing with applicable rules and regulations;</li> <li>- respect for and protect confidential and privileged information to which they have access to in their course of business.</li> </ul> <p>The has recently been amended (First Revision 28 January 2020) and is now in the final stages of approval. When finalised, the Code would contain a provision that states that the Policy is to be read in conjunction with Genting Plantations Whistleblower Policy.</p>	Complied

		<p>There is evidence that briefing on the Ethical Conduct and Integrity Policy, such as prohibition against corruption and bribery has been given to workers, contractors and suppliers. is being implemented in the sampled business operations and transactions. This is based on review of training module and interviews conducted with workers at the Mill and Estates audited who confirmed their understanding and compliance with the Policy.</p> <p>Commitment to Genting Plantations' Ethical Conduct and Integrity Policy is available in all contracts, as sighted under Schedule X1 of the contract with CPO transporters.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>The system that has been put in place to monitor compliance and implementation of the Group's Ethical Conduct and Integrity Policy include:</p> <ul style="list-style-type: none"> <li>- Conducting annual internal audits. Sighted records of internal audits conducted at Genting Sepang Bute Division (on 23 &amp; 24 Jan 2020), at Genting Cheng Division (30 &amp; 31 Jan 2020), Tebong Estate (30 &amp; 31 Jan 2020), Genting Tanah Merah Estate (23 &amp; 24 Jan 2020), Sri Gading Estate (20 &amp; 21 Jan 2020) and Genting Ayer Item Palm Oil Mill (20 &amp; 21 Jan 2020).</li> <li>- Centralizing at the Headquarters in Kuala Lumpur all tender processes, rate of contract approvals and payments to ensure minimal interface and handling of cash at estate/mill levels. This was confirmed by contractors interviewed during the audit.</li> </ul> <p>Trainings given to all employees during Policy training and induction training for newly-arrived workers. Policy trainings and induction trainings for newly-arrived workers were conducted at Genting Ayer Item Palm Oil Mill (on 8 Feb 2019, 29 May 2019, and 11 Jan 2020 respectively).</p>	Complied



<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1</b>			
There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Major compliance -	<p>Genting Ayer Item CU continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating unit and SD sustainability team. The CU had obtained and renewed their license and permits as required by the law. The following were sampled</p> <p>List of compliance:-</p> <p>Tebong &amp; Cheng estate</p> <ul style="list-style-type: none"> <li>- MPOB license 501803202000 valid until 30 Nov 2020.</li> <li>- Diesel for 10000 Liter license refer SK(M)382/2003(D) valid until 30 July 2020</li> <li>- Weighbridge calibration by Metrology Corporation as per 2.1K Q004903 valid until 1 Oct 2020</li> <li>- Air Compressor MK PMT 3442 va</li> <li>- License from JTK for Salary deduction (electricity ) as per JTK/M/(PMT)10401/2015/0016(NN) dated 12 Mei 2005</li> <li>- JPS approval (BKSAM 0601) license no. 293/118(1)/10.2019valid until 30 September 2020</li> </ul> <p>Tanah Merah &amp; Sepang estate</p> <ul style="list-style-type: none"> <li>- MPOB license 611773002000 valid until 31 May 2020</li> <li>- Weighbridge (B1230484) already been calibrate by Metrology Corporation dated 11 Sept 2019</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- Diesel license (MR/PD/SK-0439) from KPDNKK valid until 10 Oct 2020</li> <li>- Air compressor JH PMT 17439 valid until 16 March 2020</li> <li>- License for salary deduction for advance as per letter PP2/34/0105 dated 8 Jan 2007.</li> </ul> <p>Another sampling in Sri Gading estate:-</p> <ul style="list-style-type: none"> <li>- MPOB license 524435102000 valid until 31 Oct 2020.</li> <li>- KPDNKK for diesel license as per letter J000266 valid until 17 July 2020.</li> <li>- Weighbridge calibration was done by Metrology Corporation dated 3 Sept 2019 (2.1K Q009891).</li> <li>- Air compressor JH PMT 17731 valid until 25 Sept 2020.</li> <li>- License for salary deduction as per license from JTK (HQ/A/P/KP.4/90) dated 29 December 1987.</li> <li>- For competent person for Scheduled waste was available CePSWaM/01714 dated 20 Feb 2018.</li> </ul> <p>Genting Ayer Item POM</p> <ul style="list-style-type: none"> <li>- PMT47883 (PMT-JH/19 87201) valid until 17 Nov 2020</li> <li>- Weighbridge calibration by metrology Corporation Malaysia Sdn Bhd dated 4/4/2019 (B1448132)</li> <li>- JH PMD 965 (PMD-JH/19 79857) valid until 10 July 2020</li> <li>- MPOB license 500056704000 valid until 31 Jan 2021</li> <li>- Audiometric test been conducted on 30 May 2019 by Poliklinik Intan (JKKP HIE 127/12/4/1-34/11) with total 81 person was involve. Retest been done 28 August 2019 for 7 STS cases.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Hygiene Tech monitoring dated 5 Sept 2019 by Maju Perkasa Sdn Bhd jkkp hq18/jhii/00/00013. The existing lev was functioning.</li> <li>- Certified Environmental Professional in the Treatment of Palm Oil Mill Effluent – Pond Processes (CEPPOME)</li> <li>- Certified Environmental Professional in Scheduled Waste Management (CePSWaM) – pending for the DOE to issue certificate (ref.: email from DOE dated 12/2/2020)</li> <li>- DOE License, No. 003866, licensee: Genting Oil Mill Sdn Bhd., validity 1/7/2019 to 30/6/2020</li> </ul>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>The system to track changes in law is implemented through the head office Sustainability Team. They are responsible for tracking and ensuring that all legal requirements applicable to Operating Units have been identified and for evaluating their potential impact on the company’s operations.</p> <p>Means of tracking and identifying include the respective authority website visits and direct communication with those agencies.</p> <p>Among the laws covered in the list were EQA, Employment Act, OSHA, FMA to name a few. The amendment/update of the list is done by Systems, Methods, Insurance and Risk Management Department (based in KL).</p> <p>The legal and other requirement sampling in Cheng estate (Tebong estate Div) already review dated February 2020 Doc no SMP-GPB-22. The list of compliance already add up Minimum Wages 2020 and also OSHA (Noise Exposure 2019). Verification with workers payslip showed all comply with the regulation.</p>	Complied
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained sampling in field 95C the boundaries between Genting Tanah Merah estate and Ah Hong orchard was clearly demarcated and visibly maintained using trench as their boundary.</p>	Complied

<b>Criterion 2.2:</b>			
All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	List of contracted parties are available and duly maintained. Details of the contracted parties are maintained in the stakeholders list, as well as a separate list which contains name of contractors, date of agreement, contract reference numbers and contract expiry dates.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	There is evidence that all contracts entered into between the Estates and Mill with FFB, EFB and CPO transporters contain a provision on meeting applicable legal requirements. These legal requirements include Environment Quality Act 1974 (Schedules Wastes) Regulation 2005, Occupational Safety And Health Act 1994, Factory and Machinery Act 1967, Workers' Minimum Standard of Housing and Amenities Act 1990, payment of minimum wages and no employment of forced labour and workers below 18 years.  Reviewed during the audit were the contracts signed between Genting Plantations (WM) Sdn Bhd with: <ul style="list-style-type: none"> <li>- Maniam s/o Marimuthi (transporter and harvesting contractor for Cheng Division) dated 1 Jan 2020;</li> <li>- Ong Shek Enterprise (transporter for Genting Sepang Estate Bute Division dated 1 Jan 2020;</li> <li>- Lau Kian Hong (EFB and FFB transporter for Tanah Merah Estate) dated 1 Jan 2020;</li> <li>- Apex Uniparts Sdn Bhd (spare parts supplier for Genting Ayer ItemPalm Oil Mill) dated 1 Jan 2020;</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- S Tivam Setia Sdn Bhd (FFB transporter for Tanah Merah Estate) dated 1 Jan 2020.</li> </ul> <p>Evidence of legal due diligence was also demonstrated by the certification unit where the proprietors' photocopy ICs, registration with the Companies Commission of Malaysia, valid bank account details were verified. Sampled during the audit were business registrations for:</p> <ul style="list-style-type: none"> <li>- Lau Kian Hong (Certificate Registration No. MA0108015-U registered on 1 April 2018 valid until 7 May 2028);</li> <li>- VKDP Maju Enterprise No Pendaftaran MA 0212332-A registered on 14 August 2019 and valid until 13 August 2020; and</li> <li>- Sinar Zamri SSM Registration Form registered from 4 July 2017 valid until 3 July 2022.</li> </ul> <p>-</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul>	<p>Evidence is available that all contracts contain clauses disallowing child and forced labour. This is contained under clause 2D(i) and 2D(ii) of the agreement where the Contractors shall ensure no minors (below 18 years old) are employed. Verified during the audit were contracts dated 1 Jan 2020 signed between the following parties:</p> <ul style="list-style-type: none"> <li>- Genting Sri Gading Estate and Ng Cheng Huat.</li> <li>- Genting Sri Gading Estate and Lau Lam Piow.</li> <li>- Genting Tebong Estate and Arumugam Adekan.</li> <li>- Genting Tanah Merah Estate and Lau Kian Hong.</li> <li>- Genting Ayer Item Palm Oil Mill and S. Tivam Setia Sdn Bhd</li> </ul>	Complied

**Criterion 2.3:**

All FFB supplies from outside the unit of certification are from legal sources.

2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> <p>- Major compliance -</p>	<p>The Genting Ayer ItemPalm Oil Mill is an Identity Preserved Mill. The Certificate Number RSPO 653474 valid from 6 May 2012 through to 25 March 2020 was duly verified during the audit. The Mill processes only FFB from its own estates namely Sri Gading Estate, Tanah Merah Estate and Tebong Estate. All these estates have clear origins, evidence of ownership status and valid MPOB licences.</p>	Complied								
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>The Genting Ayer ItemPalm Oil Mill is an Identity Preserved Mill (Certificate Number RSPO 653474) and therefore does not source FFB indirectly through collection centres, agents or other intermediaries. Therefore, this Indicator is not applicable.</p>	Not applicable								
<p><b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b></p>											
<p><b>Criterion 3.1</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>											
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Major compliance -</p>	<p>Business plan is documented in a form of annual budget which has the information about crop projection, CPO &amp; PK projection and operation cost. For the estates, the average production cost per mt FFB is around RM200/mt. Whereas for the mill the average production cost per mt FFB processed is around RM55/mt. The expenses of the operating units are reported monthly to GPB HQ through "Plantation Report" as a monitoring mechanism.</p>	Complied								
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>Annual replanting programme was available at each visited estates which included the 5 years projection. The programme are as follows:</p> <table border="1" data-bbox="954 1305 1767 1396"> <tr> <td data-bbox="954 1305 1070 1353">Year</td> <td colspan="3" data-bbox="1070 1305 1767 1353">Ha</td> </tr> <tr> <td data-bbox="954 1353 1070 1396"></td> <td data-bbox="1070 1353 1301 1396">GTBE</td> <td data-bbox="1301 1353 1532 1396">GTME</td> <td data-bbox="1532 1353 1767 1396">GSGE</td> </tr> </table>	Year	Ha				GTBE	GTME	GSGE	Complied
Year	Ha										
	GTBE	GTME	GSGE								

		<table border="1"> <tr> <td>2020</td> <td>128</td> <td>26.19</td> <td>264.63</td> </tr> <tr> <td>2021</td> <td>264</td> <td>135.63</td> <td>116.91</td> </tr> <tr> <td>2022</td> <td>30</td> <td>111.82</td> <td>253.91</td> </tr> <tr> <td>2023</td> <td>103</td> <td>81.67</td> <td>0</td> </tr> <tr> <td>2024</td> <td>0</td> <td>86.46</td> <td>0</td> </tr> <tr> <td>2025</td> <td>0</td> <td>0</td> <td>0</td> </tr> </table>	2020	128	26.19	264.63	2021	264	135.63	116.91	2022	30	111.82	253.91	2023	103	81.67	0	2024	0	86.46	0	2025	0	0	0	
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3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Management review was last conducted on 6/2/2020 at Genting Ayer Item Oil Mill attended by 15 key personnel from the operating units. Based on the minutes of meeting, among the agenda discussed were:</p> <ul style="list-style-type: none"> <li>• Minutes/actions of previous meeting</li> <li>• RSPO &amp; MSPO audit schedule and certification status</li> <li>• Changes and improvement on sustainability management system</li> <li>• Results of internal audits</li> <li>• Complaints and grievances</li> <li>• Enquiry register</li> <li>• Stakeholder meeting/minutes</li> <li>• Greenhouse gasses</li> <li>• Resource and training requirements</li> <li>• Sustainability policies</li> <li>• Review of effectiveness in achieving quality, environmental, social, safety and health objectives</li> <li>• Compliance with legal requirements</li> <li>• Supply chain and traceability</li> <li>• Preventive and corrective actions</li> <li>• Recommendations for improvement</li> </ul>	Complied																								

<p><b>Criterion 3.2</b>          The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
<p>3.2.1</p>	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.          - Major Compliance -</p>	<p>Among the continuous improvement plan verified against budget at GAIOM certification unit are:</p> <ul style="list-style-type: none"> <li>• Minimise use of certain pesticides such as paraquat or metamidophos – paraquat was last used in April 2019</li> <li>• To minimise environmental impact on availability of ground water by minimise soil erosion and maintain riparian reserve</li> <li>• Waste reduction by recycling activity</li> <li>• Improving the machinery efficiency therefore fossil fuel usage is optimised</li> <li>• To improve the understanding of complaint procedure amongst stakeholders through stakeholders meeting</li> <li>• Maximising yield of crop</li> </ul>	<p>Complied</p>
<p>3.2.2</p>	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b>          The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.          Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG,</p>	<p>RSPO PalmGHG Calculator is used by the certification unit as a reporting method of its continuous improvement progress. Latest record was available under ACOP 2019 report.</p>	<p>Complied</p>



	<p>Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>		
<p><b>Criterion 3.3</b>          Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
<p>3.3.1</p>	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Major Compliance -</p>	<p>The GAIOM has documented and maintained its own operational procedure covering all work stations from FFB Reception to CPO Dispatch and its supporting functions such as Laboratory, Workshop and Weighbridge. It is a three tier documentation level: Procedure Manual, System Procedure, Standard Operating Manual, Safe Operating Procedure and Environmental Control Procedure.</p> <p>On the estates front three sets of manual had been developed and used daily in their operations, namely:</p> <ul style="list-style-type: none"> <li>- Sustainability Management Procedure Manual enumerating 32 topics, latest update on 11/02/2019.</li> <li>- OSH Manual covers accident notification, PPE, health and safety programme, Emergency Response Plan, safety signage, OSH committee, HIRARC, and</li> <li>- Oil Palm Manual consisting of SOP describing activities at estate, example:</li> </ul> <p>OPM 1: Land clearing, preparation, planting and legume covers establishment            OPM 2: Oil palm nursery practices            OPM 3: Planting density and planting technique            OPM 4: Soil conservation and terracing            OPM 5: Pest and disease            OPM 6: Weeding-weed management            OPM 7: Manuring of oil palm            OPM11: Harvesting            OPM 13: Managing difficult soils</p>	<p>Complied</p>

3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>The mechanism to check consistent implementation for all activities carried out in the estate was through internal audit. Verified the internal audit report at mill and estate visited as follows:</p> <ul style="list-style-type: none"> <li>• Genting Tebong Estate on 30-31/1/2020</li> <li>• Genting Tanah Merah Estate on 23-24/1/2020</li> <li>• Genting Sri Gading Estate on 20/1/2020</li> <li>• Genting Ayer Item Oil Mill on 13-14/1/2020</li> </ul> <p>Additionally, Assistant Managers and Mill/Field Supervisors of the respective Operating Unit during their mill or field rounds do ensure Safe Work Practices and Standard Operating Procedures are followed.</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>All records related to Internal Audit, Mill Inspector and Estate Inspector visit was maintained and available at mill and estate offices.</p>	Complied
<p><b>Criterion 3.4</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Major Compliance -</p>	<p>There are no new plantings or new operations within the Genting Ayer Item Palm Oil Mill supply base. Nevertheless, each unit has its own Social and Environmental Impact Assessments done which have been prepared by internally by the Sustainability Department. The assessments were done as follows:</p> <ol style="list-style-type: none"> <li>a. Genting Cheng Estate: from 6<sup>th</sup> to 8<sup>th</sup> March 2019 report dated 21 March 2019.</li> <li>b. Genting Sepang Estate: from 4<sup>th</sup> – 5<sup>th</sup> March 2019 report dated 13<sup>th</sup> March 2019</li> <li>c. Genting Sri Gading Estate, Genting Tanah Merah Estate and Genting Tebong Estate: report dated 28<sup>th</sup> January 2020.</li> </ol>	Complied

		<p>The Environmental Aspect and Impact Assessment was dated 2 Jan 2020.</p>	
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>The reports for all Estates and Mill are separated into Social Impact Assessments and Environmental Aspect and Impact Assessment, and comprise management and monitoring plans. Based on the records of stakeholders consulted (workers, contractors, estate grocery shops, nearby schools, representatives from nearby temples and suraus, villagers, smallholders, nearby residential communities and government agencies), there is evidence that these exercises were undertaken with the participation of the affected stakeholders. Interviews conducted with the stakeholders also confirmed that they were able to express their views freely.</p> <p>Among the issues considered in preparing the SEIA included positive and negative impacts of the mill and estate operations on its stakeholders, impacts on peoples' amenities, food security of the Orang Asli, employment opportunities for the local communities, land ownership, user access and boundaries with the neighbouring communities. Other considerations include impacts of spraying, POME, decanter cake and EFB application near residential areas including village houses, waste management, sanitation, storage of scrap iron, landfill, domestic, internal and external transportation of FFB, water management, etc.</p> <p>There is evidence from the reports that the management and monitoring plans have been conducted with the participation of affected parties which included Tok Batin of Kg Air Tawas, temple heads, village heads, and workers.</p>	<p>Complied</p>

3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Major Compliance -</p>	<p>The social and environmental management and monitoring plans were carried out in 2019 and 2020, and therefore is not due for any updates as yet. The management and monitoring plans were carried out as follows:</p> <ul style="list-style-type: none"> <li>a. Genting Cheng Estate: from 6th to 8th March 2019;</li> <li>b. Genting Sepang Estate: from 4th – 5th March 2019;</li> <li>c. Genting Sri Gading Estate, Genting Tanah Merah Estate and Genting Tebong Estate: report dated 28th January 2020</li> </ul> <p>The Environmental Aspect and Impact Assessment was dated 2 Jan 2020.</p>	Complied
<p><b>Criterion 3.5</b>  A system for managing human resources is in place.</p>			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>The employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination are documented in the following documents:</p> <ul style="list-style-type: none"> <li>- Foreign Workers' Employment Payment and Recoverable (GEN-13 Rev 01). Although Rev 01 has not been finalized and is awaiting formal approval, as of the date of this audit, this document is already being implemented. This was confirmed via documentation review and interviews with management and workers on issues of recruitment, selection and hiring.</li> <li>- On issues related to promotion, retirement and/or termination, this is provided for in the employment contracts (for foreign workers) and letter of appointment (for local workers), and these are made available to the workers.</li> </ul>	Complied

<p>3.5.2</p>	<p>Employment procedures are implemented, and records are maintained. - Minor Compliance -</p>	<p>There is evidence that the employment procedures for recruitment, selection, hiring, promotion, retirement and/termination are implemented and records are maintained. Sighted during the audit were documentations related to selection, hiring of the following workers:</p> <p>Sri Gading Estate: Workers IC No. 521218-01-6100, Worker Passport No. M9831617.</p> <p>Genting Ayer Item Palm Oil Mill: Workers Passport No. AU226572, BA0873743)</p> <p>Genting Sepang Bute Division: Workers Passport No.AT476074, C3500589.</p> <p>Genting Tebong Estate Kelemak Division: Worker No. C000465, C000468, 07378</p> <p>Additionally, record is also maintained of promotions. Sampled during the audit was a letter dated 9 Oct 2019 sent by an Assistant Manager to the Senior Manager of Sri Genting Estate proposing an increase in wages and job responsibilities of Worker Passport No. M8221254. (Wage increase from RM42.31 to RM44.81 with additional patrolling allowance of RM100 per month, and overtime rate at RM8.40 per hour).</p>	<p>Complied</p>
<p><b>Criterion 3.6</b></p>			

An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Major Compliance -</p>	<p>All operations have been risk assessed as per SOP for HIRARC (OMGPB- 07, Rev:0, Date:1/1/2010) and documented to address the identified issues. The end product, individual Risk register had been established at the POM and estates visited.</p> <p>HIRARC established at the mill were not limited to the following:</p> <ul style="list-style-type: none"> <li>- Maintenance and servicing – pump, press, lightning arrester</li> <li>- Welding and cutting job, electrical works</li> <li>- Sterilizer – operation, cages handling, capstan line</li> <li>- FFB processing from stripping, oil extraction to storage and CPO dispatch and treatment of by-products/waste</li> <li>- Boiler house – ash removal from hopper chute, maintenance. Furnace cleaning, clinkers raking activities, determining control and PPE standards</li> <li>- Engine room operation</li> <li>- Oil and effluent water sampling and analysis</li> </ul> <p>Whereas at the estates, examples include activities or areas such as:</p> <ul style="list-style-type: none"> <li>- Chemical spraying;</li> <li>- Harvesting;</li> <li>- Pruning;</li> <li>- Manuring;</li> <li>- Weeding;</li> <li>- Rat baiting and bag worm treatment;</li> <li>- FFB loading, collection and transporting;</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- Transporting of workers;</li> <li>- Workshop operations;</li> <li>- Chemical, fertilizer and lubrication store;</li> <li>- Genset operation and maintenance;</li> <li>- Road maintenance.</li> </ul> <p>For every hazard recognized in the Risk Register their corresponding actions have been documented and implemented to address the identified issues.</p> <p>For chemical risk, sampling Chemical Health Risk Assessment report ( JKKP HIE 127/171-2(154)-2017/011 was available dated June 2017 prepared by QMSPRO Sdn Bhd. All chemical been registered under Chemical register and latest update was Jan 2020, no new chemical.</p>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Major Compliance -</p>	<p>OSH Plan dated Jan 2020 was sighted, latest management plan already include the plan and strategies for Agrochemical implementation, Harvesting operation and others. Management already include in the budget pertaining to OSH management such as OSHA training, poster and campaign, Service of fire extinguisher, PPE and medical examination with total RM 38488.00.</p> <p>The effectiveness of the H&amp;S plan was verified such as Medical surveillance programme as per implementation of medical surveillance, Genting Tebong send 25 person including 13 workers that work for pesticide, 10 workers for fertiliser activity and last 2 workers for Diesel operator dated 21 June 2019. This was followed as per Chemical Health Risk Assessment report ( JKKP HIE 127/171-2(154)-2017/011 was available dated June 2017 prepared by QMSPRO Sdn Bhd. From the result all workers was fit to work with chemical. Another plan was to send JKKP report example JKKP 8 for Cheng estate, Sighted JKKP8/46382/2020 dated 10 Jan 2020. As per implementation of Safety and Health plan, the chemical register (MK/12/04/875) already been updated 2 Jan 2020.</p>	Complied

<b>Criterion 3.7</b>															
All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.															
3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Major Compliance -</p>	<p>No scheme small holder in Genting Air item and supply base. All employees and contractors were provided training related to their job skills, RSPO requirements, Occupational Health &amp; Safety and Environmental matters. Their training program includes productivity and best management practice subjects by growers and miller. Specific to estates the examples include felling of oil palm trees, nursery, replanting, harvesting and upkeep of fields to evacuation of FFB to mill. Likewise, at the mill it covers from FFB receipt, grading, processing to Crude Palm Oil, storage and dispatch of CPO, nut kernel and the management of by-products, wastes and waste streams.</p>	Complied												
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Records of evaluation to check the understanding of participants was also sighted. The training program specified the target group of employees to be trained for the identified subjects.</p> <p>Some of the trainings verified were:</p> <table border="1" data-bbox="952 1018 1727 1380"> <thead> <tr> <th>Trainings</th> <th>Date of training</th> </tr> </thead> <tbody> <tr> <td colspan="2" style="text-align: center;">Genting Ayer item Mill</td> </tr> <tr> <td>Sohelp training</td> <td>27 Sept 2019</td> </tr> <tr> <td>Occupational Ergonomic &amp; ERA at workplace</td> <td>20 August 2019</td> </tr> <tr> <td>Accident and Insurance claim training</td> <td>30 April 2019</td> </tr> <tr> <td>First aid training</td> <td>2 April 2019</td> </tr> </tbody> </table>	Trainings	Date of training	Genting Ayer item Mill		Sohelp training	27 Sept 2019	Occupational Ergonomic & ERA at workplace	20 August 2019	Accident and Insurance claim training	30 April 2019	First aid training	2 April 2019	Complied
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		Tebong estate		
		HIRARC & Functions of SHC Training	29 March 2019	
		Spraying and PPE Training	28 March 2019	
		Manuring Training	28 March 2019	
		Policy Training	19 March 2019	
		Harvester Training	18 March 2019	
		Scheduled waste Management training	15 March 2019	
		Sepang & Tanah Merah		
		Group Policies training	14 May 2019	
		Recycle waste training	14 March 2019	
		Water sampling analysis training	28 March 2019	
		Safety under TNB rentis training	26 April 2019	
		First aid training	25 March 2019	
		JKKP committee training	26 June 2019	
		Chemical safety training	18 Sept 2019	
		Manuring (Vicon spreader) training	8 March 2019	
		Emergency response Training	2 Feb 2020	
		Fire fighting and fire drill training	22 April 2019	

		<table border="1"> <tr> <td>Driving competency and maintenance training</td> <td>27 Sept 2019</td> </tr> <tr> <td>Harvesting training</td> <td>28 Jan 2019</td> </tr> <tr> <td>Environmental Aspect and impact training</td> <td>12 March 2019</td> </tr> <tr> <td colspan="2" style="text-align: center;">Sri Gading estate</td> </tr> <tr> <td>Scheduled waste Training (sri gading)</td> <td>5 Feb 2020</td> </tr> <tr> <td>First aid training</td> <td>20 March 2019</td> </tr> <tr> <td>Policy Training</td> <td>1 April 2020</td> </tr> <tr> <td>Oil Yield Project training</td> <td>18 July 2019</td> </tr> <tr> <td>Harvesting training</td> <td>26 Jan 2019</td> </tr> <tr> <td>Buffer zone and HCV training</td> <td>30 Jan 2020</td> </tr> <tr> <td>Training on store, chemical handling</td> <td>31 Jan 2020</td> </tr> </table>	Driving competency and maintenance training	27 Sept 2019	Harvesting training	28 Jan 2019	Environmental Aspect and impact training	12 March 2019	Sri Gading estate		Scheduled waste Training (sri gading)	5 Feb 2020	First aid training	20 March 2019	Policy Training	1 April 2020	Oil Yield Project training	18 July 2019	Harvesting training	26 Jan 2019	Buffer zone and HCV training	30 Jan 2020	Training on store, chemical handling	31 Jan 2020	
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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Personnel involved in the RSPO SCCS implementation is based on the critical control point within the facility. Relevant personnel to supply chain implementation as identified are i.e. weighbridge operators, security guards, lab personnel, office clerks and executives. The last training for RSPO SCCS was conducted on 1/8/2019 and attended by 10 persons.</p>	Complied																						
<b>Criterion 3.8</b>																									

Supply chain requirement for mills ( <b>note: all supply chain requirements are considered as critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle</b> )			
3.8.1	<p>Definition Identity Preserved Mill D.1:</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, then only Module E is applicable.</p>	<p>Genting Ayer Item oil Mill Model: Identity Preserved.</p> <p>The management has established the SOP for Supply Chain and Traceability (Mill), SMP-GPB-23, Revision:03, Dated 29/9/2019 which covered unique running batch number, supply chain model (IP), training, persons responsible, registration and reporting requirements, handling of noncertified product, RSPO stamps (IP), authorization, delivery/goods received. This Mill only process FFB from Genting Tanah Merah estate, Tebong estate, Sungei Rakyat estate, Sri Gading estate and Kulai Besar estat. No small holder was send to Genting Ayer Item POM.</p> <p>The mill has only received all the certified FFB from its certified estates which belong to Genting Plantations Berhad. SOP for RSPO Supply Chain – Module D – CPO Mills: Identity Preserved (IP) was available for verification. It was developed to implement the IP supply chain system at the POM. The procedure has covered the incoming FFB, outgoing CPO &amp; PK at RSPO certified mills that operate IP supply chain system. During the period of Feb 2019 to Jan 2020, GAIOM has received and processed 230,486.89 mt of FFB from Genting’s own certified plantations.</p>	Complied
3.8.2	<p>Definition Mass Balance Mill E.1</p> <p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3<sup>rd</sup> party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB</p>	N/A	Not applicable
3.8.3	<p>Explanation (Volume and product integrity) – D.2, E.2</p>	<p>The forecast tonnage of CPO and PK product that could potentially be produced as per detail below:</p>	Complied

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	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report. The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).</p>	<p>FFB: 202,579.00Mt CPO: 42,604Mt PK: 10,836</p> <p>Genting Plantations Bhd held RSPO membership number: 1- 0086-06-000-00 since 14 November 2006. Company has registered in palmTrace system as follows: Members ID – Genting Ayer Item Oil Mill : RSPO_PO1000002439 Licence valid until 25/3/2020 Member category : Oil Mill</p>	
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<p>3.8.4</p>	<p>Documented procedures – 5.3.1, D.3, E.3</p> <p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>Complete and up-to-date procedures covering the implementation of all the elements of the supply chain model requirements.</p> <ul style="list-style-type: none"> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>• Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation’s procedures for the implementation of this standard.</li> <li>• The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</li> </ul>	<p>GPB has developed procedures to implement the elements of the applicable supply chain model as follows:</p> <ul style="list-style-type: none"> <li>• Sustainability Management Procedure Manual Title: Traceability (Estate); Doc. # SMP-GPB-09; Rev. 02; Issue date: 14/8/2014</li> <li>• Sustainability Management Procedure Manual Title: Supply Chain and Traceability (Mill); Doc. # SMP-GPB-23; Rev. 06; Issue date: 18/1/2018.</li> </ul> <p>The RSPO Chairman has the overall responsibility and authority over the implementation of the procedure, requirements and compliances with all the applicable RSPO Supply Chain Certification Standard. The procedure also specified the RSPO Chairman shall have the overall responsibility for the implementation of the procedure with assignment of relevant personnel from various departments to assist in the implementation. Sighted the Letter of Appointment as Person In-Charge for Supply Chain dated 1 September 2017. The appointment letter from the SVP-Group Processing dated 1/9/2017 mentioned that Mill Manager as the management representative for RSPO at Genting Ayer Item Oil Mill.</p>	<p>Complied</p>
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<p>3.8.5</p>	<p>Internal Audit – 5.3.2</p> <p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <p>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <hr/> <p>Effectively implements and maintains the standard requirements within its organisation.</p> <hr/> <p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</p>	<p>Written procedure available as Procedure Manual Title: Internal Audit; Doc. # PM-IA-01; Rev. 00; Issue date: 2/1/2018 and Sustainability Management Procedure Manual Title: Sustainability Internal Audit; Doc. # SMP-GPB-03; Rev. 02; Issue date: 21/3/2018. Internal audit conducted on 13-14 Jan 2020 by Sustainability Manager (P. Sivaji Raja) as per RSPO &amp; MSPO Internal Audit Report dated 3 Feb 2020.</p> <p>Based on Sustainability Management Procedure Manual; Doc. # SMP-GPB-06; Rev. 00; Issue date: 1/8/2013 and Procedure Manual Title: Management Review; Doc. # PM-MR-01; Rev. 00; Issue date: 2/1/2018 to conduct review at least once a year. Management review meeting was conducted on 6 Feb 2020 as per minutes of meeting 3rd RSPO &amp; MSPO Management Review Minutes (Southern Region) Genting Plantations Berhad. Agenda included the following (Chapter 13. Supply Chain and Traceability):</p> <ul style="list-style-type: none"> <li>- Results of internal audit – no findings</li> <li>- Customer feedback – no complaints</li> <li>- Preventive and corrective – no issues</li> <li>- Follow up – no issues</li> <li>- No changes</li> <li>- Recommendation – to use new agreement for contractual</li> </ul>	<p>Complied</p>
<p>3.8.6</p>	<p>Purchasing Goods In – 5.4, D.4.1/ D.4.2, E.4.1/E.4.2</p> <p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <hr/> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <hr/> <p>The site shall have a mechanism in place for handling non- conforming oil palm products and/or documents.</p>	<p>The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit. Genting Ayer Item POM has system to verify at the weighbridge. Genting Ayer Item POM only received FFB from own estate. Sighted sampled as following:</p> <ol style="list-style-type: none"> <li>1. Genting Sri Gading Estate Despatch Note: FFB1900168W Weighbridge Ticket: FFB19004278W Date: 18/5/2019 Field: P96B Tonnage: 15.74 mt</li> </ol>	<p>Complied</p>

		<p>Transporter: HIAP SOON                  2. Genting Tanah Merah Estate                  Despatch Note:FFB20000105W                  Weighbridge Ticket:FFB20000699W                  Date: 30/1/2020                  Field:P02A – P94D                  Tonnage:25.31MT                  Transporter:KARUPIAH                  3. Genting Tebong Estate                  Despatch Note: FFBR19002402W                  Weighbridge Ticket: FFB19006688W                  Date: 31/7/2019                  Field: P94A2-TBRP                  Tonnage:19.86MT                  Transporter:S THIVAN SDN BHD                  No overproduction as per data verification in mill as per detail below:-                  As per certificate                      Actual                  206,330 FFB      174,638.31 FFB                  43,635 CPO      36,158.83 CPO                  10,622 PK      8912.41 PK</p> <p>Mechanism in place for handling nonconforming oil palm products and/or documents was describe in the procedure available. No non-conforming products recorded since last audit.</p>	
3.8.7	<p>Outsourcing Activities – 5.5                  In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent</p>	<p>Outsourcing only applicable for CPO despatch based on the delivered contract with buyers. No outsourcing for PK despatch that have ex-mill contracts with buyers. Sighted the contract agreement as following:                  - CPO Transport Agreement between Genting Oil Mill Sdn. Bhd. And Makmur Transport Sdn. Bhd. Dated 1 March 2018</p>	Complied

	<p>third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organisation (not the tank farm manager).</p>	<p>- CPO Transport Agreement between Genting Oil Mill Sdn. Bhd. And Teo Tuan Kwee Sdn. Bhd. Dated 1 March 2018</p> <p>Both contracts have been included with addendum of CPO Transport Agreement Addendum on RSPO, MSPO, ISCC &amp; OSHA 1994 as per memorandum dated 30/1/2019 from SVP Processing &amp; Downstream Manufacturing.</p>	
	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <ul style="list-style-type: none"> <li>a) The site has legal ownership of all input material to be included in outsourced processes;</li> <li>b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any</li> </ul>	<p>The outsource activity only cover for transportation, there are 2 company involved:-</p> <ul style="list-style-type: none"> <li>1. Makmur Transport Sdn. Bhd.</li> <li>2. Teo Tuan Kwee Sdn. Bhd</li> </ul> <p>Both company have agreement with the Genting Ayer Item POM management. Under the contract both party agreed to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	<p>Complied</p>



	and all information, when this is announced in advance.		
	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	The management have kept the record name and contact detail of the contractor that involved in physical handling of RSPO product per below: 1. Makmur Transport Sdn. Bhd. 2. Teo Tuan Kwee Sdn. Bhd	Complied
	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	No new contractor used for the processing or physical handling of RSPO certified oil palm products in Genting Ayer Item POM.	Complied
3.8.8	Record keeping – 5.9 The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	GAIOM has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	Complied
	Retention times for all records and reports shall be a minimum of two(2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	All relevant records related to supply chain available since at least past 2 years. Current records shown positive stock was reported as of the record dated 31/1/2020 for CPO = 253.996 mt.	Complied
	The organisation shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	Up-to-date records available including the following: - Genting Ayer Item Oil Mill Daily Production - Factory Crop Intake and Production Statement (monthly basis) - Stock and Despatch Statement ( monthly basis ) for CPO - Stock and Despatch Statement ( monthly basis ) for PK - Annual Summary of Monthly Statement	Complied

		<ul style="list-style-type: none"> <li>- Certified CPO sales contract</li> <li>- Certified PK sales contract</li> <li>- Despatch records</li> <li>- Identity Preserved (IP) Worksheet – Monthly Input; ISCC, RSPO and MSPO Sustainable Products – Monthly Movement Summary Report (CPO); Appendix X (Version 5, GAIOM: 18/8/2018)</li> <li>- Identity Preserved (IP) Worksheet – Monthly Input; ISCC, RSPO and MSPO Sustainable Products – Monthly Movement Summary Report (PK); Appendix X (Version 5, GAIOM: 18/8/2018)</li> </ul> <p>The estimated volume of oil palm and palm kernel product was available as per below. The volume of purchase and claimed also available in the mill record for review.</p> <p>The forecast volume for 2020:</p> <p>CSPO = 42,604 mt</p> <p>CSPK = 10,836 mt</p>	
	<p>D.5.1 – The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>Or</p> <p>E.5.1 –</p> <p>a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and/or three-monthly basis.</p> <p>b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting</p>	<p>All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. Computerized system in place. No PKO and Palm kernel expeller at Genting Ayer Item Palm Oil mill. Daily records are prepared at the entry point at the weighbridge.</p> <p>Daily summary and monthly summary documented for all the FFB received. Computerized system in place with the delivery deducted accordingly.</p> <p>The Mill aware that only positive stock can be delivered as only positive stock is allowed in system. No short selling.</p>	<p>Complied</p>

	<p>system according to conversion ratios stated by RSPO.</p> <p>c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.)</p>		
3.8.9	<p>Conversion Factors – 5.10</p> <p>Where applicable, a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organisations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org)</p>	<p>The conversion rate in Genting Ayer Item POM was only from FFB into crude palm oil(CPO) and palm kernel (PK). The latest for FFB to CPO was 21.15 % and for FFB to Palm Kernal was 5.15%.</p>	Complied
	<p>Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The conversion was updated during monthly meeting held by management. The latest for FFB to CPO was 21.15 % and for FFB to Palm Kernal was 5.15%.</p>	Complied
3.8.10	<p>Processing – D.6</p> <p>The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation.</p>	<p>The management has established the SOP for Supply Chain and Traceability (Mill), SMP-GPB-23, Revision:03, Dated 29/9/2019 which covered documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation.</p>	Complied
3.8.11	<p>Sales and goods out – 5.6</p>	<p>All of the information can be seen in various documents such as weighbridge tickets, delivery order, goods received notes, lab analysis report, transporters' collection order and sales contracts to name a few. For FFB delivery, the information is available in estates' weighbridge ticket and mill's weighbridge</p>	Complied

	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment / delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number.</li> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> <li>• For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments.</li> </ul>	<p>tickets. All of the CPO &amp; PK were delivered via tanker to local refineries mostly located in Pasir Gudang.</p> <p>Sale contract for CPO on Dec 2019 was available as per detail below:-</p> <p>Contract no: SMW/1119/A01CPO  Buyer: MewahXXXXX Industri Sdn Bhd  Total CPO: 400Mt  Contract dated: 9 Oct 2019</p> <p>Despatch ticket # CPOSG19000533W; Date: 4/12/2019;  Tanker # JTE8731/T/NA2064; Nett weight: 39.27mt; Cert. # RSPO 653474; e-trace # TR-8a01de11-7b73;G.R.N No# R0596147</p> <p>Despatch ticket # CPOSG1900532W; Date: 4/12/2019;  Tanker # BFA4509T/JA376; Nett weight: 41.34mt; Cert. # RSPO 653474; e-trace # TR-8a01de11-7b73;G.R.N No# R0596146</p> <p>Despatch ticket # CPOSG19000531W; Date: 4/12/2019;  Tanker # NCN3912; Nett weight: 40.32mt; Cert. # RSPO 653474; e-trace # TR-8a01de11-7b73;G.R.N No# R0596139</p> <p>Despatch ticket # CPOSG1900530W; Date: 4/12/2019;  Tanker # JGE4785; Nett weight: 35.75mt; Cert. # RSPO 653474; e-trace # TR-8a01de11-7b73;G.R.N No# R0596071</p> <p>Despatch ticket # CPOSG1900529W; Date: 4/12/2019;</p>	
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3.8.12	<p>Registration of Transactions – 5.7  Supply chain actors who:</p> <ul style="list-style-type: none"> <li>• Are mills, traders, crushers and refineries; and</li> <li>• Take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	<p>The actor is a palm oil mill and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. Based on the downloaded transactions register from the certification unit’s Palmtrace, the company was able to demonstrate that it has been registering its transactions in the Palmtrace accordingly.</p>	Complied
	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:  Shipping Announcement/Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure2 and 3, refer Annex 1) shall be registered as a Shipping Announcement/Announcement in the RSPO IT Platform.</p>	<p>Based on the announcement summary, all the registrations were found to be in order.</p>	Complied

	<p>time to do Shipping Announcement/Announcement is based on members' own standard operating procedures.</p> <p>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</p> <p>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</p> <p>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements/Announcements.</p>		
3.8.13	<p>Claims – 5.11</p> <p>The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied
<p><b>Principle 4: Respect community and human rights and deliver benefits</b></p>			
<p><b>Criterion 4.1</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			

4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Major compliance -</p>	<p>Genting Plantations Berhad has a Social Policy dated 22 June 2015 signed by its President and Chief Operating Officer. This Policy contains a statement that it respects and supports the Universal Declaration of Human Rights. Amendments to this Social Policy is in the final stages and awaiting formal approval. This revised Policy contains additional provisions on zero-tolerance against any threats, intimidation and reprisal against Human Rights Defenders who submit a complaint in good faith. The Social Policy 2015 was briefed to workers during Policy trainings, and during external stakeholder meetings.</p> <p>Sampling was done at Genting Sri Gading Estate where the Policy trainings to respect human rights were held on 5 Feb 2020 to internal stakeholders comprising assistant managers, senior assistant manager, checkers, staff, health assistant. Workers were briefed of this Policy on 1 April 2019. For local communities, contractors and suppliers, the Policy was briefed on 10 July 2019 and 18 December 2019 during stakeholder consultations.</p> <p>At Genting Tanah Merah Estate, Policy awareness training was given on 29 and 30 Aug 2019, and at Sepang Bute Division on 14 May 2019.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Based on documents, field observations and interviews conducted with workers (local and foreign, harvesters, general workers, mill workers, security personnel including auxiliary police), contractors and suppliers, and local communities from Kg Baru, Kg Hilir, Kg Paya Mas, Kg Maju Jaya that there is no evidence that the Ayer Item Palm Oil Mill and its supply base have instigated any violence or use any form of harassment in their operations.</p>	Complied
<b>Criterion 4.2</b>			

There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Major compliance -</p>	<p>On matters pertaining to dispute resolution, all units within the Genting Ayer Itemill supply base subscribes to the Genting Plantations Berhad's Sustainability Management Procedure Manual Title: Complaints and Grievances. The updated Procedure Doc No SMP-GPB-19 Rev 04 Date of Issue: Feb 2020 is in the final stages of being finalized. Once finalized, it will include provisions allowing parties to a grievance or dispute to have access to independent legal and technical advice and third-party mediator.</p> <p>Social Policy is being updated also which will include zero tolerance policy against any threats, intimidation and reprisal against HRD who submit a complaint in good faith.</p> <p>Evidence is also available that a dispute pertaining to overplanting of 0.081 ha at Genting Sepang Estate Bute Division on a Muslim cemetery at Kg Chinchang was resolved in an effective and timely manner. The issue was brought to the attention of Bute Division during an external stakeholder meeting on 15 March 2019. Via a letter dated 15 March 2019, the matter was resolved where it was agreed by both parties that the boundary has been demarcated and that the palms would be allowed to stand to provide shelter to the local communities.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The procedure that has been put in place to ensure that the complaints and grievance procedure is understood include displaying the procedure on all main notice boards, detailing out the procedure in a flowchart, and for illiterate parties, verbal briefing was given. For newly-arrived workers especially, who do not understand either Bahasa or English, the help of a</p>	Complied



		translator from among the workers are sought. This was confirmed during audit interview by the workers as well as by the appointed translator.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	There is evidence that parties are informed of the progress of their grievances. Sighted was the grievance by the Head Village of Kg Chinchin, Kg Lembah Paya and Kg Rampai who claimed during a stakeholder meeting on 15 March 2019 that field No. OP2008 at Bute Division had encroached onto the village's cemetery area. Immediate decision by both parties to allow the palms to remain within the cemetery area was made and a letter dated the same date (15 March 2019) was prepared and signed between Genting Sepang Estate and the Village Head, Hamid bin Dollah.  Additionally, complaints of house defects and rectification works were recorded and counter-signed by the house occupant.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	The updated Complaints and Grievances Procedure Doc No SMP-GPB-19 Rev 04 Date of Issue: Feb 2020 is in the final stages of being finalized and pending final approval. Once finalized, it will include provisions allowing parties to a grievance or dispute to have access to independent legal and technical advice and third-party mediator.	Complied
<b>Criterion 4.3</b>			
The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated.	There is evidence that contributions to community development have been made based on consultations with the local community. These include: a. Providing job opportunities to local communities. At Genting Ayer Item Palm Oil Mill, approximately half of its workforce is from within the local	Complied

	<p>- Minor compliance -</p>	<p>community. At Genting Tanah Merah Estate, job opportunities were provided for 4 Orang Asli from Kg Air Tawas (Orang Asli village) are working at Tanah Merah Estate as general workers and driver.</p> <p>b. Mutual understanding with the surrounding Hindu populations where they are allowed to enter the estate premises (Sepang Estate, Cheng Estate, Tebong Estate. Sighted during the audit was a letter dated 10 June 2019 from a local community, C. Kartik a/l Chandran requesting that the estate gate be opened to allow worshippers to attend ceremony at the Sri Muniswarar temple from 6 to 7 July 2019.</p> <p>c. Tebong estate sponsors water and electricity SRJK(T) Tebong.</p> <p>d. Sri Gading pays for estate water and electricity of the SRJK(T), use of estate football field, use of estate road for cross country training</p> <p>e. At the Genting Ayer Item Palm Oil Mill, the Sekolah Agama Sri Maju wrote to the Mill Manager on 4 Aug 2019 requesting for a 10'x10' shelter to be used by pupils of Sekolah Agama Sri Maju. The teacher confirmed that the shelter has been erected and this is supported by a pictorial evidence.</p>	
<p><b>Criterion 4.4</b></p>			
<p>Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Major compliance -</p>	<p>Evidence of legal ownership over the estate land is available in the form of land titles. Sampled during the audit are the following registered land titles:</p> <p>Tebong estate:</p> <ul style="list-style-type: none"> <li>• No Hakmilik 11865 No Lot 1173 (30.1 ha) owned by Genting Plantartions (WM) Sdn Bhd registered on 21 Feb 1992.</li> <li>• No Hakmilik 11866 No Lot 1176, (22.17 ha), owned by Genting Plantartions (WM) Sdn Bhd registered on 21 Feb 1992.</li> <li>• No Hakmilik 11867 No Lot 1177, (65.96.17 ha) owned by Genting Plantations (WM) Sdn Bhd registered on 21 Feb 1992.</li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>No Hakmilik 9073 No Lot 1, (253.362 ekar) pertanian, registered on 6 October 1989.</li> </ul> <p>Tanah Merah Estate:</p> <ul style="list-style-type: none"> <li>No Hakmilik 24960 No Lot 6608 (3.0377 ha) with no specific conditions registered on 2 June 1975. Land ownership was issued to Asiatic Plantations (WM) Sdn Bhd on 25 April 1959</li> <li>No Hakmilik 81740 No Lot 3849 (126.9195 ha) with no specific conditions registered on 1 March 2006. Land ownership was issued to Asiatic Plantations (WM) Sdn Bhd on 21 Jan 1941</li> <li>No Hakmilik 81750 No Lot 3854 (295.724 ha) with no specific conditions registered on 19 Dec 2003 to Asiatic Plantations (WM) Sdn Bhd</li> </ul> <p>Genting Ayer Item Palm Oil Mill (comprising 36.90ha located within the land title of Sing Mah Estate):</p> <p>No Hakmilik 96424 No Lot 227 &amp; 228 (446.3676 ha) with the condition that it be planted with oil palm, registered on 10 April 2009 and land title issued to Sing Mah Estate.</p>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	The land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities from Kg Baru, Kg Hilir, Kg Paya Mas, Kg Maju Jaya that there is no evidence of any legal, customary or user rights of other users on any of the estates within Ayer Item Palm Oil Mill and its supply base. Therefore, no agreement-making process and negotiated agreements detailing FPIC process is necessary and available.	Not applicable

4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>The land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities from Kg Baru, Kg Hilir, Kg Paya Mas, Kg Maju Jaya that there is no evidence of any legal, customary or user rights of other users on any of the estates within Ayer Item Palm Oil Mill and its supply base.</p> <p>Therefore, no agreement-making process and negotiated agreements detailing FPIC process is necessary and available.</p>	Not applicable
4.4.2b	<p>Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p> <p>- Minor compliance -</p>	<p>The land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities from Kg Baru, Kg Hilir, Kg Paya Mas, Kg Maju Jaya that there is no evidence of any legal, customary or user rights of other users on any of the estates within Ayer Item Palm Oil Mill and its supply base.</p> <p>Therefore, no agreement-making process and negotiated agreements detailing FPIC process is necessary and available.</p>	Not applicable
4.4.2c	<p>Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	<p>The land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities from Kg Baru, Kg Hilir, Kg Paya Mas, Kg Maju Jaya that there is no evidence of any legal, customary or user rights of other users on any of the estates within Ayer Item Palm Oil Mill and its supply base.</p>	Not applicable

		Therefore, no maps of an appropriate scale showing extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties is necessary and available.	
4.4.3	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Major compliance -</p>	The land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities from Kg Baru, Kg Hilir, Kg Paya Mas, Kg Maju Jaya that there is no evidence of any legal, customary or user rights of other users on any of the estates within Ayer Item Palm Oil Mill and its supply base. The map show the boundary and verified as per site verification.	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>The land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities from Kg Baru, Kg Hilir, Kg Paya Mas, Kg Maju Jaya that there is no evidence of any legal, customary or user rights of other users on any of the estates within Ayer Item Palm Oil Mill and its supply base.</p> <p>Therefore, no evidence of communities are represented through institutions or representatives of their own choosing, including by legal counsel is necessary and available.</p>	Not applicable
4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p>	The land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities from Kg Baru, Kg Hilir, Kg Paya Mas, Kg Maju Jaya that there is no evidence of any legal, customary or user rights of	Not applicable

	- Major compliance -	other users on any of the estates within Ayer Item Palm Oil Mill and its supply base.  Therefore, no evidence of implementation of agreements negotiated through FPIC has been annually reviewed in consultation with affected parties is necessary and available.	
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No customary land within mill and estate of Genting Ayer Item complex. Hence, this requirement is not applicable (N/A).	Not applicable
<b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Major compliance -	NA as no new plantings are established on local peoples' land by Genting Ayer Item certification unit.	Not applicable
4.5.2	<b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	NA as no new plantings are established on local peoples' land by Genting Ayer Item certification unit.	Not applicable

	- Major compliance -		
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -	NA as no new plantings are established on local peoples' land by Genting Ayer Item certification unit.	Not applicable
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	NA as no new plantings are established on local peoples' land by Genting Ayer Item certification unit.	Not applicable
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	NA as no new plantings are established on local peoples' land by Genting Ayer Item certification unit.	Not applicable
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	NA as no new plantings are established on local peoples' land by Genting Ayer Item certification unit.	Not applicable

	- Minor compliance -		
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	NA as no new plantings are established on local peoples' land by Genting Ayer Item certification unit.	Not applicable
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Major compliance -	There is no new lands are not acquired for plantations and mills after 15 November 2018.	Not applicable
<b>Criterion 4.6</b> Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Major compliance -	The procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation is in place. This is evident from document entitled Procedure on Conflict Resolution and Handling of Negotiations and Compensations Document No. SMP-GPB-18; Rev. No. 03, issued on 29 Dec 2017.	Complied
4.6.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Major compliance -	The procedure for calculating and identifying legal, customary or user rights, and for distributing fair and gender-equal compensation is in place as evident under document entitled Conflict Resolution and Handling of Negotiations and Compensations Document No. SMP-GPB-18; Rev. No. 03, issued on 29 Dec 2017. As of the date of this audit, there has been no evidence of any compensation paid to any party. Therefore, its implementation, evaluation and corrective actions taken could not be verified.	Complied



4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	The Genting Ayer ItemPalm Oil Mill is an Identity Preserved Mill. The Certificate Number RSPO 653474 valid from 6 May 2012 through to 25 March 2020 was duly verified during the audit. The Mill processes only FFB from its own estates namely Sri Gading Estate, Tanah Merah Estate and Tebong Estate and do not have any dealings with smallholders and therefore this Indicator is not applicable.	Not applicable
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	There has been no evidence of negotiated agreements, compensation and payments made and therefore the efficacy of the procedure could not be verified during this audit.	Not applicable
<b>Criterion 4.7</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place. - Major compliance -	The procedure for identifying people entitled to compensation is in place as evidenced by the document entitled Conflict Resolution and Handling of Negotiations and Compensations Within GENP Estates; Doc. No. SMP-GPB-18; Rev. No. 03 issued on 29 December 2017.	Complied
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Major compliance -	The procedure for calculating and identifying legal, customary or user rights, and for distributing fair and gender-equal compensation is in place as evident under document entitled Conflict Resolution and Handling of Negotiations and Compensations Document No. SMP-GPB-18; Rev. No. 03, issued on 29 Dec 2017. This document is available for review by stakeholders.	Complied

4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>As of the date of this audit, there is no evidence of any communities who have lost access and rights to land for plantation expansion of any of the units within the Genting Ayer Item Mill and its supply base. Therefore, this Indicator is not applicable.</p>	Not applicable
<p><b>Criterion 4.8</b></p>			
<p>The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>As of the date of this audit, a dispute arose at Genting Sepang Estate in relation to area OP2008 (0.081 ha) which the local community of Kg Chinchang claimed to have encroached onto the local Muslim cemetery. The local community had initially wanted the estate to return the area with palms standing. By letter dated 15 March 2019 from Genting Sepang to Village Head Kg Chinchang, it was agreed that the boundary has been demarcated and that the palms are not felled so they could provide shelter to those visiting the cemetery. The letter was acknowledged by the Village Head of Kg Chincang, Hamid bin Dollah.</p>	Complied
4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Major compliance -</p>	<p>A dispute arose at Genting Sepang Estate in relation to area OP2008 (0.081 ha) which the local community of Kg Chinchang claimed to have encroached onto the local Muslim cemetery. The local community had initially wanted the estate to return the area with palms standing. This was brought up during stakeholder meeting on 15 March 2019. The conflict was resolved by letter dated 15 March 2019 from Genting Sepang to Village Head Kg Chinchang, it was agreed that the boundary has been demarcated and that the palms are not felled so they could provide shelter to those visiting the cemetery. The letter was acknowledged by the Village Head of Kg Chincang, Hamid bin Dollah.</p>	Complied

4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	As of the date of this audit, there is no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations of any of the units within Genting Ayer Item Palm Oil Mill and its supply base.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	On the issue of dispute at Genting Sepang Estate in relation to area OP2008 (0.081 ha) which the local community of Kg Chinchang claimed to have encroached onto the local Muslim cemetery, the extent of the disputed area is mapped out participatorily as evidenced by letter dated 15 March 2019 signed between Genting Sepang Estate and Village Head of Kg Chinchang, Hamid bin Dollah.	Complied
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1</b>			
The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	The Genting Ayer ItemPalm Oil Mill is an Identity Preserved Mill as evidenced by Certificate No. RSPO 653474 which is valid from 6 May 2012 through to 25 March 2020. The Mill processes only FFB from its own estates namely Sri Gading Estate, Tanah Merah Estate and Tebong Estate and therefore this Indicator is not applicable however the current price was publicly available at weighbridge area	Complied
5.1.2	<b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Major compliance -	The Genting Ayer ItemPalm Oil Mill is an Identity Preserved Mill as evidenced by Certificate No. RSPO 653474 which is valid from 6 May 2012 through to 25 March 2020. The Mill processes only FFB from its own estates namely Sri Gading Estate, Tanah Merah Estate and Tebong Estate and therefore this Indicator is not applicable.	Complied

5.1.3	<p><b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Major compliance -</p>	<p>The Genting Ayer ItemPalm Oil Mill is an Identity Preserved Mill as evidenced by Certificate No. RSPO 653474 which is valid from 6 May 2012 through to 25 March 2020. The Mill processes only FFB from its own estates namely Sri Gading Estate, Tanah Merah Estate and Tebong Estate and therefore this Indicator is not applicable.</p>	Complied
5.1.4	<p><b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Major compliance -</p>	<p>The Genting Ayer ItemPalm Oil Mill is an Identity Preserved Mill as evidenced by Certificate No. RSPO 653474 which is valid from 6 May 2012 through to 25 March 2020. The Mill processes only FFB from its own estates namely Sri Gading Estate, Tanah Merah Estate and Tebong Estate and therefore this Indicator is not applicable.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Based on review of contracts with FFB, EFP and CPO transporters, suppliers and harvesting contractors, there is evidence that the contracts are fair, legal, transparent and have an agreed timeframe. The contracts is of a fixed duration of 1 year from 1 Jan 2020. Among others, the contracts contain clear provisions related to type of work, value and payment methods, obligations and undertakings of both parties, mutual termination clause and governing law. Interviews held with the contractors and suppliers (Ong Shek Enterprise, Maniam s/o Marimuthi, Lau Kian Hong, Apex Uniparts Sdn Bhd).</p>	Complied
5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p>	<p>Based on interviews conducted with contractors and FFB and CPO transporters, all of them confirmed that payments are made within 2 to 4 weeks of invoice. Latest payment records for January 2020 were verified</p>	Complied

	- Major compliance -	during the audit. For FFB and CPO transporters, the weightbridge tickets state the price of FFB/CPO per tonne, weight, and total amount paid. Sampled was the receiving note issued to FFB contractor at Tebong Estate dated 18 Jan 2020. It contains ticket number, date, time, weight of FFB.	
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Weighing equipment at the Estates and Mill are verified on an annual basis. Sampled during the audit was the Perakuan Penentuan Timbang dan Sukat for the Genting Ayer Item Mill (Serial No. 1448132 and 1448135) dated 4 April 2019.	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	The Genting Ayer Item Palm Oil Mill is an Identity Preserved Mill as evidenced by Certificate No. RSPO 653474 which is valid from 6 May 2012 through to 25 March 2020. It has no dealings with any smallholders.	Complied
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Major compliance -	The Genting Ayer Item Palm Oil Mill is an Identity Preserved Mill as evidenced by Certificate No. RSPO 653474 which is valid from 6 May 2012 through to 25 March 2020. It has no specific grievance mechanism for smallholders, but smallholders would be able to use Genting's general grievance mechanism which is open to all its stakeholders which is Genting Plantations Berhad's Sustainability Management Procedure Manual Title: Complaints and Grievances. The updated Procedure Doc No SMP-GPB-19 Rev 04 Date of Issue: Feb 2020.	Complied
<p><b>Criterion 5.2</b>  The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			

5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Not applicable since there is no Scheme Smallholders supplying to the mill.	Not applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	Not applicable since there is no Scheme Smallholders supplying to the mill.	Not applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Not applicable since there is no Scheme Smallholders supplying to the mill.	Not applicable
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Major compliance -	Not applicable since there is no Scheme Smallholders supplying to the mill.	Not applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Not applicable since there is no Scheme Smallholders supplying to the mill.	Not applicable
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b>			

Any form of discrimination is prohibited.																					
6.1.1	<p><b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Major compliance -</p>	<p>The Genting Ayer Item Palm Oil Mill and its supply base subscribe to Genting Plantations Berhad’s Social Policy signed by President/Chief Operating Officer dated 22 June 2015 and People Policy dated 3 August 2009 which states the Group’s commitment to not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.</p> <p>The People Policy dated 3 August 2009 also states that no one shall be denied their rights to equal opportunities. These Policies are publicly displayed at all main notice boards within the premises.</p>	Complied																		
6.1.2	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Major compliance -</p>	<p>Interviews held with local and foreign workers (men and women) confirmed that there has been no incidence of discrimination in any form (racial, gender, caste, national origin, marital status, etc). However, as acknowledged and confirmed by the harvesting contractor Arumugam s/o Adekan, the following sampled workers from Kelemak Division, Cheng Estate have been making monthly cash payments to the said Arumugam s/o Adekan to reimburse him for costs incurred:</p> <table border="1" data-bbox="952 1134 1787 1393"> <thead> <tr> <th>Worker No</th> <th>Date of payment</th> <th>Amount paid (RM)</th> </tr> </thead> <tbody> <tr> <td>C00465</td> <td>6 Nov 2019</td> <td>200.00</td> </tr> <tr> <td></td> <td>18 Nov 2019</td> <td>120.00</td> </tr> <tr> <td></td> <td>7 Dec 2019</td> <td>300.00</td> </tr> <tr> <td></td> <td>8 Jan 2020</td> <td>200.00</td> </tr> <tr> <td>C00467</td> <td>7 Oct 2020</td> <td>200.00</td> </tr> </tbody> </table>	Worker No	Date of payment	Amount paid (RM)	C00465	6 Nov 2019	200.00		18 Nov 2019	120.00		7 Dec 2019	300.00		8 Jan 2020	200.00	C00467	7 Oct 2020	200.00	Major noncompliance (C)
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6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Evidence is available that all the units within the Genting Ayer Item Palm Oil Mill and its supply base determine recruitment, selection, hiring, access to training and promotion based on skills, capabilities, qualities and medical fitness necessary for the jobs available. This was evident from the notice of job vacancy, written application submitted, interview process, medical check-up and issuance of letter of appointment of sampled workers at all the estates and Mill. Trainings are conducted either generally and to all (e.g. Policy, RSPO, safety trainings). For some job specifications, e.g. sprayers, specific training on chemical handling are also provided.</p>	Complied																																							



		This was also confirmed by sprayers, harvesters and manurers interviewed during the audit.	
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	None of the field workers at any of the estates have been pregnant in the past 5 years. Female clerical staff at the estate and mill offices also confirmed that pregnancy tests have not been conducted as a discriminatory measure. Therefore, there is no evidence that pregnancy tests have been conducted in a discriminatory manner. This was confirmed by Health Assistants and female employees interviewed.	Complied
6.1.5	<b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Major compliance -	All the Estates and Mill have their own gender committee known as Women & Children Committee. Interviews conducted with the Committee members reveal that they understand the purpose of the Committee is to raise awareness on threats of abuse and sexual harassment and complaints procedure, reproductive rights such as right to childbirth and time off during breastfeeding, right to paid maternity leave, equal pay for equal job, no chemical handling while pregnant and breastfeeding. Sampled activities carried out by the Women & Children Committees of Tebong Estate (29 Aug 2019 and 23 Jan 2020), Sri Gading Estate (26 June 2019, 26 Dec 2019) and Genting Oil Palm Mill (10 Jan 2020), include all the above.	Complied
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	There is available evidence that all workers (male/female/foreign/local) are getting the same pay for the same work scope as follows:  Male, foreign, checker (Worker No. 03578): RM47.31 per day Female, local, checker (Worker No. 02561): RM47.31 per day	Complied

		<p>General worker from Malaysia (Worker No. 03418): RM44.81 per day</p> <p>General worker from India (Worker No. 03612): RM44.81 per day.</p>	
<p><b>Criterion 6.2</b>            Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Major compliance -</p>	<p>Documentation of pay and conditions are available in employment contracts issued to all workers (local and foreigners). The employment contracts are prepared in Bahasa Malaysia and for those workers who do not understand or could not read Bahasa Malaysia, translations are provided. The following employment contracts were sampled and verified to be valid and current, duly signed and witnessed:</p> <p>Sri Gading Estate (Workers Passport No. J9664713, M8221254, M9831617),            Tebong Estate (Workers No. C00465, 03736, 03720, 03627), Tanah Merah Estate (Workers Passport No. B5359395, B4064725, AT 095632), Sepang Estate (Workers passport No. C3500589, AT476074, Employee No. 03574), Oil Palm Mill (BH0797858, AU226754, AU226572, N6995245).</p> <p>Interviews conducted with the workers confirmed that they understand the employment contracts and that it was explained to them in a language they understand by their co-workers.</p> <p>Payment of minimum wages under the Minimum Wages Order 2020 which came into force on 1 February 2020 couldn't be verified as the pay slips for Feb 2020 have not been prepared. A letter from MAPA dated 11 Feb 2020 sent to Director General, Labour Department, Peninsular Malaysia, Ketua Pengarah Tenaga Kerja Sememanjung Malaysia, Putrajaya was sighted</p>	Complied

		<p>during the audit. The letter refers to the implementation of Minimum Wages Order 2020, and sought guidance regarding the boundaries of city council and municipal council areas. The letter also states that this guidelines by the National Wages Consultative Council, the MAPA members will comply with paragraphs 6 &amp; 7 of the Minimum Wages Order 2020 i.e. minimum wages of RM1,100 or RM42.31 per day.</p> <p>-</p>	
<p>6.2.2</p>	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Major compliance -</p>	<p>The employment contracts signed between the estate/mill management contain employment and payment terms and provisions covering contract duration, age of retirement, workers' obligations, payment of levy my employer, salary payable to be based on agreement between MAPA/NUPW and in line with the Minimum Wages Order in force, working hours, rest days, overtime, working on rest day, working on public holidays, accommodation available, transport to and from place of work, payment of salary, deductions, flight tickets for foreign workers, consensual passport safekeeping by employer, mutual termination, etc.</p> <p>The pay slip is the document that give accurate information on compensation for all work performed. It contains the following information: employee name, IC/passport, gang, month of pay, work description, (normal work, overtime pay, piece-rate work, public holiday pay, company contributions such as SOCSO, EIS, KSWP, deductions such as advance, average daily rate, total income for the month, total deductions, net pay. None of the workers have family members working to help them with their work.</p> <p>Employment contracts and pay slips for May 2019, Dec 2019, and Jan 2020 were sighted for the following workers:</p>	<p>Major noncompliance (C)</p>

		<p>Sri Gading Estate (Workers No. 03612, 03578, 03766, 02561, C000188),</p> <p>Tebong Estate (Workers No. C00465, 02809, 02873, 03736, 03720, 03627),</p> <p>Tanah Merah Estate (Workers No. 03128, 02926, 02884, 02963, 02986, 02979, 03143, 03144),</p> <p>Sepang Estate (Workers passport No. C3500589, AT476074, Employee No. 03574),</p> <p>Oil Palm Mill (Passport Nos. BH0797858, AU226754, AU226572, N6995245).</p> <p>However, workers' salary deductions for electricity and water were made without complying with the condition imposed by the Labour Office. Written approvals to deduct workers' wages for water and electricity were received from the Labour Office as follows:</p> <ul style="list-style-type: none"> <li>a. 12 May 2015 for Tebong Estate</li> <li>b. 21 Dec 2015 for Tanah Merah Estate</li> <li>c. 29 December 1987 and 31 Dec 2014 for Sri Gading Estate</li> </ul> <p>The approvals were given subject to written application from the workers. However, the following deductions were made without evidence of the workers' written applications:</p>	
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<b>Estate</b>	<b>Workers' No</b>	<b>Month/Year</b>	<b>Water (RM)</b>	<b>Electricity (RM)</b>
Tebong	02809	Jan 2020	-	13.01
	02873	Jan 2020	-	8.73
	03640	Jan 2020	-	8.59
Tanah Merah	03128	Dec 2019	9.06	6.25
	02884	April 2019	9.94	12.22
		Dec 2019	8.81	9.14
	02963	April 2019	8.40	14.50
		Dec 2019	6.40	14.17
	02986	Dec 2019	-	16.43
	02979	Dec 2019	4.80	9.88
03143	Dec 2019	-	10.47	
Sri Gading	03612	May 2019	2.86	14.12
		Dec 2019	2.86	15.04
		Jan 2020	2.86	16.79
	03578	Dec 2019	2.86	0.87
		Jan 2020	2.86	0.22
	03766	May 2019	2.86	14.12
		Dec 2019	2.86	10.03
Jan 2020		2.86	10.03	

		<table border="1" data-bbox="954 363 1753 660"> <tr> <td rowspan="3">C00188</td> <td>May 2019</td> <td>1.64</td> <td>3.44</td> </tr> <tr> <td>Dec 2019</td> <td>3.29</td> <td>12.97</td> </tr> <tr> <td>Jan 2020</td> <td>3.29</td> <td>14.84</td> </tr> <tr> <td rowspan="3">02561</td> <td>May 2019</td> <td>11.42</td> <td>111.62</td> </tr> <tr> <td>Dec 2019</td> <td>11.42</td> <td>74.12</td> </tr> <tr> <td>Jan 2020</td> <td>11.42</td> <td>89.82</td> </tr> </table> <p>Therefore, a Major Non-Compliance was raised.</p>	C00188	May 2019	1.64	3.44	Dec 2019	3.29	12.97	Jan 2020	3.29	14.84	02561	May 2019	11.42	111.62	Dec 2019	11.42	74.12	Jan 2020	11.42	89.82	
C00188	May 2019	1.64		3.44																			
	Dec 2019	3.29		12.97																			
	Jan 2020	3.29	14.84																				
02561	May 2019	11.42	111.62																				
	Dec 2019	11.42	74.12																				
	Jan 2020	11.42	89.82																				
6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Major compliance -</p>	<p>Evidence is available that regular working hours as determined by the Employment Act and stipulated in employment contracts are being adhered to. Any work in excess of 8 hours are being compensated as overtime. This is based on punch cards reviewed and interviews with mandores and workers. Those who work piece-rated sometimes chooses to work more than 8 hours per day to achieve a higher harvest, i.e. higher than the target set my management, and although they are not paid overtime, they receive a higher income for the day as their wages are calculated based on the bunch weight of harvest.</p> <p>Overtime are being paid in accordance with the Employment Act 1955 as sighted for auxiliary police at the Genting Palm Oil Mill. Letter from Labour Office Peninsular Malaysia issued to Genting Oil Mills Sdn Bhd, Genting Ayer Itemdated 21 May 2018 (Ref BHG.PU/9/134 Jld 13 (30) in relation to application for increasing monthly overtime hours to 13 hours per month was granted under Section 60A(4)(a) Employment Act 1955. Based on records of</p>	Complied																				

		<p>punch cards, none of the sampled workers have exceeded 130 hours overtime per month.</p> <p>Pay slips also show that workers are paid for any certified medical leave. Female staff (locals) interviewed at Sri Gading Estate and Tebong Estate confirmed that pregnant employees receive 2 months paid maternity leave. Annual leave for daily rated workers are paid in December as Vacation Leave Pay. There has been no dismissals within the audit period and therefore compliance with the notice period could not be verified.</p> <p>Based on pay slips reviewed, statutory deductions are made as required under the laws for SOCSO, EPF and EIS for local workers. Reviewed during the audit were pay slips (May 2019, Dec 2019, Jan 2020) for the following workers:</p> <p>Tebong Estate: 02809, 02873, 03640.          Tanah Merah Estate: 03128, 02884, 02963, 02986, 02979, 03143          Sri Gading Estate: 03612, 03578, 03766, C00188, 02561          Genting Ayer ItemMill: Passport Nos. BH0797858, AU226754, AU226572, N6995245.</p>	
6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO</p>	<p>Evidence is available that the Genting Palm Oil Mill and its supply base provide adequate housing and facilities in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. All foreign workers are provided with accommodation as stated in their employment</p>	Complied

	<p>Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Major compliance -</p>	<p>contracts. Local workers too are offered accommodation, but those who are within the local communities prefer to live outside the estate/mill premises.</p> <p>Each house contains rooms of between 2 to 5, and each room with between 1 to 2 occupants. Each worker and staff housing area come with amenities such as badminton/takraw/volleyball court, places of worship, sundry shops, community hall and some, football field. There is evidence that linesite inspection are being carried out once a week based on linesite inspection records at Tebong Estate (31 Dec, 3 Jan, 10 Jan, 17 Jan). The Visiting Medical Officer also visits the linesite together with the Health Assistants.</p> <p>Workers are provided with water and electricity, and the bills are shared among occupants and deducted from their wages. Free medical treatment above is provided also to all workers and their dependants. A visiting medical officer comes and visits the clinics once a fortnight to see patients and supervise the work of the Health Assistant. At Tebong Estate, the visits were done on 13 Feb 2002, 23 Jan 2020, 9 Jan 2020, 26 Dec 2019 and 12 Dec 2019. And at Sri Gading Estate, VMO visits were carried out on 15 Feb 2020, 1 Feb 2020 18 Jan 2020, 7 Dec 2019, 21 Dec 2019.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>All units have its own canteen and grocery store which sells basic items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within its expiry period. Workers interviewed informed that they purchase items from these stores, but also since the estates and mill are easily accessible to the nearest town, they also go out to the towns. Workers could either pay in cash, or on credit.</p>	Complied



<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b></p> <p><b>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</b></p> <p><b>(Endorsed by the RSPO BoG on 7th November 2019)</b></p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavor to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><b><i>Where a GLWC living wage standard (benchmark), or one that fulfills the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></b></p>	<p>All sampled workers receive at least minimum wages. In addition, the certification unit also have carried out the calculation of prevailing wages and in-kind benefits. The calculation took into account housing costs, transport allowances, health care, sports facilities and food ration.</p> <p>The prevailing wage calculated for:</p> <ul style="list-style-type: none"> <li>a. Sepang, Tebong and Cheng Estates dated 27 Jan 2020 is RM1,270.27</li> <li>b. For Tanah Merah, Sri Gading and Genting Ayer ItemPalm Oil Mill dated 20 Feb 2020 is RM1,329.02.</li> </ul>	<p>Complied</p>
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	<p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><b><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage</i></b> (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW</p>		
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	<p>with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> <li>• The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>All the estates and mill employ full-time employees. Foreign workers are full-time employees but have a contractual duration which is stipulated in their employment contracts which is 2 years for Indonesians and 3 years for other nationalities. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department. There are no casual workers hired in mill and estate within operating unit. All employees are permanent employee (for locals) and contracted employee (for foreign workers).</p>	Complied

**Criterion 6.3**

The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.

6.3.1	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Major compliance -</p>	<p>Social Policy dated 22 June 2015 which was signed by the President/Chief Operating Officer respects the rights of employees and workers to join or form legal trade unions of their choice and to bargain collectively. This Policy is displayed at the main notice boards at the Estates and Mill and implementation is clearly demonstrated. Many employees are members of MAPA-NUPW.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Evidence is available that management of certification units conduct regular meetings with trade union or committee of Workers' Committee. At the Mill, a meeting was held on 16 Oct 2019 between Mill management and Worker Committee where the issues related to housing conditions, street lighting, leave for foreign workers to go for a holiday in their home countries, request for sports facilities (volleyball &amp; netball) and transport for workers' children to school were discussed.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on interviews conducted with worker representatives from Sri Gading Estate, Sepang Estate, Tebong Estate and Genting Ayer Item Palm Oil Mill, they confirmed that they were elected by workers themselves, and that the management did not interfere with the formation and operation of the Workers' Representative Committees.</p>	Complied
<p><b>Criterion 6.4</b>  Children are not employed or exploited.</p>			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The Genting Ayer Item Palm Oil and supply base subscribes to Genting Plantations Berhad's Social Policy dated 22 June 2015 and People Policy dated 3 Aug 2009 which states that the company does not employ any child labour.</p>	Complied

		All contracts entered into with third parties contain a clause which states that the contractor shall ensure no minors (below 18 years old) are employed. -	
6.4.2	<b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Major compliance -	Based on documentation review, interview of workers and field observations, evidence is available that minimum age requirements are met. This was further verified by looking at the checkroll list where records show that all workers employed are above 18 years old.	Complied
6.4.3	<b>(C)</b> Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work. - Major compliance -	Based on documentation review, interview of workers and field observations, no young persons are employed within the unit of certification.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	Communication of Genting Plantations Berhad's Social Policy dated 22 June 2015 and People Policy dated 3 Aug 2009 which states that the company does not employ any child labour was made during stakeholder meetings, during Policy briefings to workers, and during induction trainings for new workers.	Complied

		<p>The Policy was also shared during meeting with stakeholders. Sri Gading Estate had its external stakeholder meeting on 26 Dec 2019 stakeholders were briefed of the Group's Policies.</p> <p>This was confirmed by workers and stakeholders (local community, teachers, contractors, suppliers) during audit.</p>	
<p><b>Criterion 6.5</b>          There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
<p>6.5.1</p>	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.          - Major compliance -</p>	<p>Genting Plantations Berhad has developed a Sexual Harassment Policy dated 3 Aug 2009 where the company commits to a harassment-free environment and avoid behaviour that may create an atmosphere of hostility and intimidation of any kind at the workplace. The policy has been briefed to all the workers during induction training, Policy trainings, muster briefings and during Women &amp; Children Committee meetings. Policy trainings were held as follows:</p> <p>Sri Gading Estate: 5 Feb 2020, 1 April 2019;          Tanah Merah Estate: 29 &amp; 30 Aug 2019;          Sepang Estate Bute Div: 14 May 2019;          Genting Palm Oil Mill: 11 Jan 2020, 8 Dec 2019, 29 May 2019.</p> <p>Interviews held with workers (male, female, local, foreign) confirmed their understanding of this Policy.</p>	<p>Complied</p>

6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Major compliance -</p>	<p>A Social Policy dated 22 June 2015 was developed in which the Genting Plantations Berhad commits to respect and protect reproductive rights. The policy has been briefed to all the workers during induction training, Policy trainings, muster briefings and during Women &amp; Children Committee meetings. Interviews with workers and members of the Women &amp; Children Committees confirmed their understanding of the Policy and the implementation, which include time off for breastfeeding, a private room for lactating mothers to express her milk, workers are not prohibited from getting pregnant, and women who are pregnant and breastfeeding are re-assigned do work that does not deal with chemicals.</p> <p>Policy trainings were held as follows:</p> <p>Sri Gading Estate: 5 Feb 2020, 1 April 2019; Tanah Merah Estate: 29 &amp; 30 Aug 2019; Sepang Estate Bute Div: 14 May 2019; Genting Palm Oil Mill: 11 Jan 2020, 8 Dec 2019, 29 May 2019.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>As of the date of this audit, there is no new mothers within the Genting Ayer Item Palm Oil Mill and its supply base. Therefore, the implementation of this Indicator could not be independently verified.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p>	<p>The Genting Ayer Item Palm Oil Mill and its supply base subscribe to the Genting Plantations Berhad's Procedure on Prevention and Eradication of Sexual Harassment at the Workplace, Doc. No. SMP-GPB-20, Rev. 0 dated 11</p>	Complied

	<p>- Minor compliance -</p>	<p>Oct 2013. This procedure states the forms of sexual harassment such as verbal, non-verbal, visual, psychological and physical harassment.</p> <p>The procedure has been briefed to all the workers during induction training, Policy trainings, muster briefings and during Women &amp; Children Committee meetings. Interviews with workers and members of the Women &amp; Children Committees confirmed their understanding of the complaints procedure.</p>	
<p><b>Criterion 6.6</b>          No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Major compliance -</p>	<p>Based on interviews conducted with local and foreign workers, there is evidence that workers' passports are kept in locked pigeon holes with one key each kept by the worker, and one by the office. Workers have full access to their own passports and have given written confirmation of their agreement to keep their passports with the office.</p> <p>The estate and Mill do not charge their workers any form of recruitment fee. Workers indicated under Indicator 6.1.2 above, are being charged for expenses incurred by the contractor who brought them in from Indonesia, and the estate is not privy to this information.</p> <p>There is no form of contract substitution. All foreign workers interviewed confirmed that while still in their home countries, they were briefed by the recruitment agents and representatives of Genting Plantations Berhad of the types of job they would be doing in Malaysia.</p>	<p>Complied</p>



		<p>There is no evidence of involuntary overtime and all overtime work is done on a mutual basis, as confirmed by Auxiliary Policemen, guards, and mill workers interviewed.</p> <p>Based on clause 23 of the workers employment contract, workers are able to submit a one-month termination notice. There is no provision in the employment contract of penalty being imposed for termination of employment.</p> <p>Based on interviews and documentation review, there is no evidence of any form of debt bondage or withholding of wages among the workers.</p>	
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Major compliance -</p>	<p>There are migrant workers employed in the estates and mill. A special labour policy and procedures are contained in Sustainability Management Procedure Manual Doc No. SMP-GPB-32 issued on 18 January 2018. This document is entitled Procedure for Social Management which stipulates post arrival trainings/induction on employee terms and conditions, sustainability, safety and health and national laws. It also assures equality and fairness, and mentions living conditions, statutory fee payable and no contract substitution.</p> <p>This Procedure is being implemented as evidenced by records of induction trainings done on new workers for example at the Mill on 11 Jan 2020, 29 May 2019, 1 June 2019.</p>	Complied

**Criterion 6.7**  
 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.

6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Major compliance -</p>	<p>In Mill, the manager was appoint as chairman for OSH committee and assistant as secretary. OSH meeting last done on 21 Nov 2019 attend by 10 person, found 1 accident been reported for June 2019. The OSH meeting was done periodically and previously record was on 22/8/2019 and 13/5/2019.</p> <p>OSH meeting in Cheng estate was done on 19 Dec 2019, 27 Sept 2019, 27 June 2019 and 13 March 2019. Appointment letter dated 10 March 2019 available for OSH committee. In Tebong estate, the OSH meeting was done periodically basis latest record was on 15 Nov 2019. Previous record was on 23 August 2019, 23 may 2019 and 25 Feb 2019. Before meeting the management will conduct workplace inspection and latest record was on 1 Nov 2019. Any issue raised also been discuss in meeting and recorded with latest status.</p> <p>OSH meeting in Sepang estate conducted according to periodically period. Sighted record of OSH meeting was on 27 Dec 2019, 26 Sept 2019, 12 July 2019 and 26 March 2019. For Tanah Merah estate, management already appoint Manager as chairman referred appointment letter dated 10 Feb 2014.</p>	Complied				
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedure was available referred document <a href="#">FPI/L@/QOHSE-22.0</a>. One accident happen on 19 June 2019 in pressing station area, the JKPP 6 record was available dated 22 June 2019. The training was done on 1 August 2019 for kernel station and for Oil Room station was on 3 May 2019.</p> <p>The Estates has site specific Plans in the OSH Manual (OM-GPB- 04, Rev:0, Dated 1/1/10) including ERP for accident, ERP for Fire, ERP for chemical spillage, maps showing assembly areas and up to date lists of emergency contacts with training conducted to communicate the Plan. Latest fire drill was conducted as per below detail:-</p> <table border="1" data-bbox="952 1332 1792 1399"> <thead> <tr> <th>Estate</th> <th>Date Training</th> </tr> </thead> <tbody> <tr> <td>Tebong estate</td> <td>18 July 2019</td> </tr> </tbody> </table>	Estate	Date Training	Tebong estate	18 July 2019	Complied
Estate	Date Training						
Tebong estate	18 July 2019						

		Tanah Merah estate	22 April 2019		
		Seri Gading estate	18 December 2019		

<p>6.7.3</p>	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Major compliance -</p>	<p>The appropriate safety and application equipment (safety boots, safety helmets, rubber boots, cartridge masks, safety goggles, gloves and overalls) had been provided and used by all chemical operators according to CHRA recommendation. PPE is been given to workers referred record in ' Buku Penerimaan PPE'. Latest PPE issuance was dated 16 November 2019 in Mill</p> <p>The all estates that been visit this time have provide PPE to the employees relevant to the work handled by the workers. The list of PPE that were provided by the estates are as below:</p> <p>i. Harvester- Safety Helmet, Sickle Cover, Hand Glove, Wellington Boots</p> <p>ii. Sprayers- Respirator, Nitrile Glove (Chemical Resistant), Goggles, Wellington Boots, Apron.</p> <p>iii. Manuring- Apron, Wellington Boots, Dust Mask</p> <p>Evidence of issuance record was sighted during audit as per below detail:-</p> <table border="1" data-bbox="952 879 1789 1307"> <thead> <tr> <th>Date</th> <th>Type of PPE</th> <th>Type of works</th> </tr> </thead> <tbody> <tr> <td>23 Jan 2020</td> <td>Apron, Cartridge and nitrile glove</td> <td>Sprayer</td> </tr> <tr> <td>27 Nov 2019</td> <td>Apron, respiration, cartridge, nitrile glove</td> <td>Manuring</td> </tr> <tr> <td>3 Feb 2020</td> <td>Harvesting sickle cover</td> <td>Harvesting</td> </tr> <tr> <td>3 Feb 2020</td> <td>Safety helmet</td> <td>Nursery</td> </tr> <tr> <td>6 Feb 2020</td> <td>Safety Shoes</td> <td>General Workers</td> </tr> </tbody> </table>	Date	Type of PPE	Type of works	23 Jan 2020	Apron, Cartridge and nitrile glove	Sprayer	27 Nov 2019	Apron, respiration, cartridge, nitrile glove	Manuring	3 Feb 2020	Harvesting sickle cover	Harvesting	3 Feb 2020	Safety helmet	Nursery	6 Feb 2020	Safety Shoes	General Workers	<p>Complied</p>
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6 Feb 2020	Safety Shoes	General Workers																			

<p>6.7.4</p>	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law. - Minor compliance -</p>	<p>The CU continued to ensure all workers working in their premises (both mill and estates) are covered by insurance. All local worker are covered by SOCSO as required under the Employee’s Social Security Act 1969. For foreign workers also cover with SOCSO and certain still cover under Insurance and will change once the insurance are expired. Sampled payment details at as follows:</p> <p>Insurance /SOCSO</p> <table border="1" data-bbox="952 619 1789 1289"> <thead> <tr> <th>Estate</th> <th>Insurance policy/SOCSO</th> <th>Sampling id</th> </tr> </thead> <tbody> <tr> <td>Tebong</td> <td>W/19/WF01/067874/KUL-68</td> <td>W19296543KUL, W19296544KUL, W19296551KUL.</td> </tr> <tr> <td>Tanah Merah</td> <td>Borang 8A SOCSO for January 2020</td> <td>201900310511, 201900769698, 201900068417</td> </tr> <tr> <td>Sri Gading estate</td> <td>Borang 8A SOCSO for Jan 2020</td> <td>202001329339, 201900583839, 201900021872</td> </tr> <tr> <td>Ayer Item POM</td> <td>Borang 8A SOCSO for Jan 2020</td> <td>201900647674, 201900647688, 201900647683</td> </tr> </tbody> </table> <p>However sighted a cases JKPP 6 for Dedi Alpan (Socso id: 201900647671) dated 28 June 2019. The LTI shows 20 days however found the MC started</p>	Estate	Insurance policy/SOCSO	Sampling id	Tebong	W/19/WF01/067874/KUL-68	W19296543KUL, W19296544KUL, W19296551KUL.	Tanah Merah	Borang 8A SOCSO for January 2020	201900310511, 201900769698, 201900068417	Sri Gading estate	Borang 8A SOCSO for Jan 2020	202001329339, 201900583839, 201900021872	Ayer Item POM	Borang 8A SOCSO for Jan 2020	201900647674, 201900647688, 201900647683	<p>Minor noncompliance</p>
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		6 July 2019 until 20 July 2019 as per payment voucher no E1202870/2019. Found from 1 July until 5 July 2019 (5 days) was not been pay or covered by insurance/ SOCSO.									
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>Records of accidents are maintained and summarized in the relevant form and submitted to DOSH as per OSH NADOOPOD Regulations 2004. The occurrence of accidents recorded for YTD December 2019 is as shown below:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Tebong estate</td> <td>7.0</td> </tr> <tr> <td>Tanah Merah estate</td> <td>37.50</td> </tr> <tr> <td>Sri Gading estate</td> <td>3.98</td> </tr> </tbody> </table> <p>JKKP 8 Tanah Merah estate referred JKKP8/53928/2019 dated 21 Jan 2020. JKKP8/45237/2020 dated 9 Jan 2020 in Sri Gading estate</p>	Estate	LTA	Tebong estate	7.0	Tanah Merah estate	37.50	Sri Gading estate	3.98	Complied
Estate	LTA										
Tebong estate	7.0										
Tanah Merah estate	37.50										
Sri Gading estate	3.98										
<b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b>											
<b>Criterion 7.1</b>											
Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.											
7.1.1	<b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control. - Major compliance -	<p>All the three estates in the CU continued to implement Integrated Pest Management (IPM). The estates continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Oil Palm Manual OPM No 5 –Pest And Diseases The IPM program among others involved the following practices;</p> <p>a) Includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma.</p>	Complied								

		<p>b) In order to minimize use of pesticides and bagworm control the estates had planted beneficial plants mainly Tunera subulata, cassia cobanensis and Antigonon leptopus with maps indicating areas planted.</p> <p>c) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year. Baiting was continued until bait acceptance fell below 20%. Barn Owl boxes are erected at ratio of 1: 10 ha to 1: 20 ha.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	No record of species of Global invasive database ad CABI.Org in Genting Ayer Item and Supply base.	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	The management not use fire as pest control. No record as per interview and document verification.	Complied
<p><b>Criterion 7.2</b>  Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Major compliance -</p>	Justification of pesticides applied is available in the Sustainability Management Procedure, SMP-GPB-28 dated 21/07/2015. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non- target species.	Complied

7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Major compliance -</p>	<p>Management only purchase chemicals that are registered under the Malaysian Pesticides Act 1974 (Act 149) and Regulations. Sighting of the Chemical Register dated 9/1/2018 at these estates showed that class 1B, II, III &amp; IV chemicals were used. There were no Class 1A agrochemicals used.</p> <table border="1" data-bbox="954 523 1794 719"> <thead> <tr> <th>Estate</th> <th>Ai/Ha</th> </tr> </thead> <tbody> <tr> <td>Tebong estate</td> <td>1.91</td> </tr> <tr> <td>Tanah Merah estate</td> <td>2.008</td> </tr> <tr> <td>Seri Gading estate</td> <td>1.41</td> </tr> </tbody> </table>	Estate	Ai/Ha	Tebong estate	1.91	Tanah Merah estate	2.008	Seri Gading estate	1.41	Complied
Estate	Ai/Ha										
Tebong estate	1.91										
Tanah Merah estate	2.008										
Seri Gading estate	1.41										
7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Major compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in GENP Sustainability Management Procedure Manual, SMP-GPB-28 Rev04, dated 3 July 2018. The implementation in the field is consistent with the manual.</p> <p>GENP views the use of agrochemicals in its daily operation as essential but not at the expense of its existing IPM programme. All pesticides application is carried out as per the Oil Palm Manual and SOP.</p>	Complied								
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in GENP Sustainability Management Procedure Manual, SMP-GPB-28 Rev04, dated 3 July 2018. The implementation in the field is consistent with the manual. Genting Management views the use of agrochemicals in its daily operation as essential but not at the expense of its existing IPM programme. All pesticides application is carried out as per the Oil Palm Manual and SOP.</p> <p>There is no prophylactic use of pesticides.</p>	Complied								



<p>7.2.5</p>	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat</p> <p>7.2.5b Why there is no other alternative which can be used</p> <p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative</p> <p>7.2.5d What is the process to limit the negative impacts of the application</p> <p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>	<p>In Genting Tebong estate, sighted record of using Paraquat in estate. The permission by Department of Agriculture was available letter no: MLK/PARA(GL)/18/007 dated 25 Oct 2018. Latest implementation of paraquat was on 31 Dec 2018 at field P18E with total 30 Liter covered 64.30 ha. No record of using Paraquat on previous year.</p> <p>In other estate, the highest class pesticide using was class II, no record using 1A and 1B been sighted from record and site observation.</p>	<p>Complied</p>
<p>7.2.6</p>	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Major compliance -</p>	<p>Pesticides were handled, used or applied by trained workers in accordance with the product label. The Pesticide operators were given training on the safe handling and application of the pesticides.</p> <p>All precautions attached to the products were explained to operators and noted during the interview with workers that they understood and properly observed them. Agrochemical Sprayers, Pre-Mixer and Mandore's understanding on precautions attached to the products and wearing of the required PPE were checked in the field by the auditor. They were found</p>	<p>Complied</p>

		understood during the interview and further confirmed by observing when they work.	
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Major compliance -</p>	<p>At all visited estates the storage of pesticides selected for use was in accordance with recognized best practices, namely, as per Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations.</p> <p>Their chemical stores were inspected and the following were noted.</p> <ul style="list-style-type: none"> <li>- All stores were secured under lock and key with restricted access.</li> <li>- Provision of ventilation fan.</li> <li>- Display of Safety Pictorial poster, namely the required PPE and chemical Safety hazards pictogram.</li> <li>- Pesticides were separated by class.</li> <li>- Daily balance of remaining solution after completing pre-mixing were kept in the store under lock and key.</li> <li>- Concrete cemented floor, bund wall and provision of sump pond.</li> <li>- Store keeper was trained in the handling of all pesticides.</li> <li>- SDS leaflets were available at all pesticide stores.</li> </ul> <p>Sighted the unused empty chemical containers that were triple rinsed, pierced 3 holes at the bottom and kept at Scheduled Waste Store. They are disposed via G-Planter Sdn Bhd. as non-scheduled waste. The approval of G-Planter to collect the containers was verified and found in order.</p>	Complied

7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Sighted the unused empty chemical containers that were triple rinsed, pierced 3 holes at the bottom and kept at Scheduled Waste Store. They are disposed via G-Planter Sdn Bhd. as non-scheduled waste. The approval of G-Planter to collect the containers was verified and found in order. Latest record verified during site visit, dated 29 July 2019 by Gplanter Lorry (JKA 1008). Latest record for empty container that been store was 90 pieces as per record and site verification.</p>	Complied
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Major compliance -</p>	<p>There was no aerial spraying observed at Tanah Merah estate, Sepang estate, Cheng estate, Tebong estate and Sri Gading estate.</p>	Complied
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Major compliance -</p>	<p>The annual medical surveillance for pesticide operator been done according to Chemical Hazard Risk Assessment recommendation. Last medical surveillance was done on 11 Jan 2019 by Klinik Falck Bestari (HQ/11/DOC/00/235), from the record all workers was fit to work with chemical. As per CHRA report dated June 2017 prepared by QMSPRO Sdn. Bhd. Medical surveillance will be conduct for workers that involve with chemical under organophosphate base. From the chemical register dated 15 Jan 2020, no record of chemical with organophosphate base been using in estate. The monthly check-up have been done by HA (Q1493) and verified by VMO, latest record was on early Feb 2020 with total 13 workers involve. All fit to work with chemical.</p>	Complied
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p>	<p>No work on pesticides has been undertaken by female worker. All workers handling pesticides were male as sighted in the field and records. The awareness have been given during Gender meeting dated 26 Dec 2019.</p>	Complied

	- Major compliance -		
<b>Criterion 7.3</b>			
Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Documented waste management plan was available at each visited estates. Among the types of waste identified were scheduled wastes, domestic wastes and recyclable wastes. The scheduled wastes were disposed in accordance to EQA regulations, domestic wastes were landfilled in accordance to procedure and recyclable wastes were delivered to recycle wastes vendors.</p> <p>Receipts of recyclable wastes disposal were available for verification, e.g.</p> <ul style="list-style-type: none"> <li>at Tanah Merah Estate – to Seng &amp; Kian Enterprise Sdn Bhd dated 13/2/2019, among the wastes collected were plastic, metal and carton box.</li> <li>at Sri Gading Estate – to Ekwong Enterprise dated 30/1/2020, among the wastes collected were plastic and carton box.</li> </ul> <p>With regards to scheduled wastes disposal, the visited operating units have satisfactorily maintained the regulated documents such as notification, inventory records and consignment notes through e-swiss. Among the scheduled wastes generated by the operating units were spent lubricants, electronic wastes, contaminated filters &amp; rags and clinical wastes to name a few.</p>	Complied
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Ref.: Sustainability Management Procedure Manual, SMP-GPB-12, rev. 1, dated 1/12/2014. Based on interview and site verification, it was noted that the proper disposal of wastes was understood by the workers and management.</p>	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Based on site verification and interview with employees at all the sampled operating units, there was no use of fire in wastes disposal observed. The mill however, has a permit from the DOE to incinerate its EFB [ref.: AS(B)J 31/152/000/004 Jilid 5(11), dated 29/4/2011].</p>	Complied

<b>Criterion 7.4</b>			
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>The good agriculture practices for estates and mills are guided by the following manuals:-</p> <ul style="list-style-type: none"> <li>a) Genting Plantations Oil Palm Manual OPM issued on 9/11/99</li> <li>b) Sustainability Management Procedure Manual 1/8/13 revised in 7/2/19.</li> <li>c) OSH Manual dated 1/1/2010.</li> <li>d) Environmental Control Procedure – 01/9/2018</li> <li>e) Store Operating Manual – 2014</li> <li>f) Standard Operating Procedure West Malaysia Estates 17/1/2011.</li> <li>g) Jobs description - 2012</li> </ul> <p>The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections:-</p> <ul style="list-style-type: none"> <li>a) OPM No 7. Manuring of oil palm</li> <li>b) OPM no 13. Managing difficult soils</li> </ul> <p>At Sri Gading Estate, the agronomist has recommended to apply 14.45 mt of ammonium chloride (AC) fertiliser at field no. P00C in year 2019.</p> <p>However, based on the records from the Lintramax system and store bin card, the amount applied was only 10.80 mt.</p>	<p>Minor noncompliance</p>

7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Soil sampling was done 5 years once as per GPRC Soil Sampling SOP dated 1 Dec 2017.</p> <p>Sighted Soil sampling was done on 30 Dec 2017 (test report: SR02/2018) by Genting Plantation Research Centre. The result show the soil sampling result and leaf sampling result.</p>	Complied						
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>Based on site visit at all of the sampled estates, EFB application were seen especially on the immature palms. The EFB were sourced from GAIOM or other third party mill nearby the estates.</p>	Complied						
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>The amount of fertiliser input is based on agronomist recommendations. Verification of various documents at each sampled estate such as agronomist report, annual manuring programme and store issuance records showed that the inputs of fertilisers to the field were accurate.</p>	Complied						
<p><b>Criterion 7.5</b>  Practices minimise and control erosion and degradation of soils.</p>									
7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Major compliance -</p>	<p>In Genting Tebong estate, the steep slope map record was sighted as per detail below:-</p> <p>Data source: SRTM90</p> <p>Relative vertical accuracy : 10 Meter</p> <p>GIS processed: 24 June 2013</p> <table border="1" data-bbox="954 1206 1794 1353"> <thead> <tr> <th>Slope classes (degree)</th> <th>Area (ha)</th> </tr> </thead> <tbody> <tr> <td>0 – 6</td> <td>1405.99</td> </tr> <tr> <td>6 -10</td> <td>130.21</td> </tr> </tbody> </table>	Slope classes (degree)	Area (ha)	0 – 6	1405.99	6 -10	130.21	Complied
Slope classes (degree)	Area (ha)								
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6 -10	130.21								

		<table border="1"> <tr> <td>10 -15</td> <td>27.43</td> </tr> <tr> <td>15 – 20</td> <td>5</td> </tr> <tr> <td>20 – 25</td> <td>1.82</td> </tr> <tr> <td>More than 25</td> <td>0</td> </tr> </table> <p>No peat area in Genting Tebong estate, verified as per soil analysis record test report no SR08/2014 dated 13/2/2014. The Organic matter around 0.67 – 2.68 % as per soil analysis.</p> <p>In Tanah Merah estate, Soil map referred as per GIS map dated 17 Feb 2020. Major soil classes in estate was Holyrood-Lunas 36.47 %, Lanchang 20.12% and Renggam –Jerangau 15.53%.</p>	10 -15	27.43	15 – 20	5	20 – 25	1.82	More than 25	0	
10 -15	27.43										
15 – 20	5										
20 – 25	1.82										
More than 25	0										
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Oil palm Manual under Topic Soil conservation and Terracing dated June 2013. All the three estates had also implemented prevention of soil erosion measures such as construction of moisture conservation pits (MCP) in steep slope areas. Cover crops were observed to be in place as the CU management had generally encouraged the establishment of soft growth. Visits to the site found that significant areas of the ground were covered with Nephrolepis biserrata. Most slopes had well established Mucuna bracteata. As per site verification, interview and document review no record of replanting been done above 25 degree.</p>	Complied								
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>No new planting in all estate visited.</p>	Complied								
<p><b>Criterion 7.6</b>  Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>											

7.6.1	<p><b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Major compliance -</p>	<p>No new planting is all estate been audit, however the management already conduct the soil survey to identifying marginal and fragile soil in estate. From the record no fragile soil in all estate bee visit, example soil sampling as per below detail:-</p> <table border="1" data-bbox="954 507 1789 705"> <thead> <tr> <th>Soil Type</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Sedu-Parit Botak-Linau</td> <td>38.86%</td> </tr> <tr> <td>Holyrood-Lunas</td> <td>7.86%</td> </tr> <tr> <td>Renggam-Jerangau</td> <td>53.28%</td> </tr> </tbody> </table> <p>This soil map dated 8 Jan 2018 from DOA.</p>	Soil Type	Percentage	Sedu-Parit Botak-Linau	38.86%	Holyrood-Lunas	7.86%	Renggam-Jerangau	53.28%	Complied
Soil Type	Percentage										
Sedu-Parit Botak-Linau	38.86%										
Holyrood-Lunas	7.86%										
Renggam-Jerangau	53.28%										
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>There are no extensive planting on marginal and fragile soil in all estate during audit, however management establish the standard operating procedure regarding to soil management can be referred Oil Palm Manual (OPM 13: Managing Difficult Soils). This SOP including peat soils, acid sulphate soils, Saline soils, Shallow lateritic soils, podzol or similar soils and Sandy soil.</p>	Complied								
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>All the three estates had also implemented prevention of soil erosion measures such as construction of moisture conservation pits (MCP) in steep slope areas. Cover crops were observed to be in place as the CU management had generally encouraged the establishment of soft growth. Visits to the site found that significant areas of the ground were covered with <i>Neprolepis biserrata</i>. Most slopes had well established <i>Mucuna bracteata</i>.</p> <table border="1" data-bbox="954 1278 1789 1374"> <thead> <tr> <th>Slope classes (degree)</th> <th>Area (percentage)</th> </tr> </thead> <tbody> <tr> <td>0 – 2</td> <td>47.5%</td> </tr> </tbody> </table>	Slope classes (degree)	Area (percentage)	0 – 2	47.5%	Complied				
Slope classes (degree)	Area (percentage)										
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		<table border="1"> <tr> <td>2 - 6</td> <td>47.58%</td> </tr> <tr> <td>6-12</td> <td>4.72%</td> </tr> <tr> <td>12-20</td> <td>0.10%</td> </tr> <tr> <td>More than 20</td> <td>0.10%</td> </tr> </table> <p>For soil survey was done by Genting Plantation Research Centre dated 5 March 2015 test report no: SR06/2015. The organic carbon was around 0.46% to 3.98%. This shoe no peat soil in estate</p>	2 - 6	47.58%	6-12	4.72%	12-20	0.10%	More than 20	0.10%	
2 - 6	47.58%										
6-12	4.72%										
12-20	0.10%										
More than 20	0.10%										
<b>Criterion 7.7</b>											
No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.											
7.7.1	<p><b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Major compliance -</p>	No peat soil in all estate. Not applicable	Not applicable								
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p><b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	No peat soil in all estate. Not applicable	Not applicable								
7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.</p> <p>- Major compliance -</p>	No peat soil in all estate. Not applicable	Not applicable								

7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.</p> <p>- Major compliance -</p>	No peat soil in all estate. Not applicable	Not applicable
7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Major compliance -</p>	No peat soil in all estate. Not applicable	Not applicable
7.7.6	<p><b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Major compliance -</p>	No peat soil in all estate. Not applicable	Not applicable

7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2019) and associated audit guidance.</p> <p>- Major compliance -</p>	No peat soil in all estate. Not applicable	Not applicable
<p><b>Criterion 7.8</b>  Practices maintain the quality and availability of surface and groundwater.</p>			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>7.8.1b Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	Based on documentation review, interviews with local communities and observations, there is no evidence that any of the unit of certification has restricted access to clean water or contributed to water pollution of the local communities within their surrounding mill and estates.	Complied

7.8.2	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Major compliance -</p>	<p>Management of riparian zone is guided by the GPB's Riparian Buffer Zone Management, doc. No. SMP-GPB-14, rev. 1, dated 14/8/2014. The width of riparian zone has been defined in the procedure. The allocated zones shall be demarcated and left to the nature. Application of agrochemicals such as fertilisers and herbicides is prohibited. Nonetheless, based on site visit at field no. 96 at See Kee Division, Tebong Estate, traces of herbicides application within the riparian zone was seen. Thus, a non-conformity report was assigned due to this lapse.</p>	<p>Major noncompliance (C)</p>
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The mill applies the biological system with anaerobic lagoon in series for its treatment of effluent. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&amp;G, AN and TN. Based on quarterly report to the DOE, generally the mill has complied with the regulated limit (100 ppm). Nonetheless, the mill has a contravene license from the DOE to have its BOD level less than 500 ppm [ref.: AS(B)J 31/152/000/004 Jilid 9(6) dated 15/5/2019].</p>	<p>Complied</p>
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill has been monitoring its consumption of water on daily basis. Based on the daily records, the consumption is as follows:</p> <ul style="list-style-type: none"> <li>- 2019: 1.46 mt/mt FFB</li> <li>2020 (as at January): 1.70 mt/mt FFB</li> </ul>	<p>Complied</p>
<p><b>Criterion 7.9</b> Efficiency of fossil fuel use and the use of renewable energy is optimised</p>			

7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>The mill and estates consistently monitored their fossil fuel consumption and kept records in order to get the information about efficient consumption. Among the management plans to improve efficiency generally were:</p> <ul style="list-style-type: none"> <li>- To carry out preventive maintenance of machinery in order to prevent high breakdown hours and making the machines more efficient</li> <li>- continuous education to operators who handle the machinery so that the unnecessary running hours can be minimised</li> <li>- to wisely use the generator set at the mill</li> </ul>	Complied
<p><b>Criterion 7.10</b>  Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
7.10.1	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Major compliance -</p>	<p>Identification of greenhouse gas (GHG) emissions has been done through the environmental aspect &amp; impact assessment. Among the source of GHG emissions were effluent treatment plant, diesel consumption and fertiliser consumption to name a few. The plan to reduce or minimise the GHG emission has been established and implemented. In general among the action plans were:</p> <ul style="list-style-type: none"> <li>- To optimise the usage of diesel</li> <li>- To apply more organic fertiliser such as bunch ash, EFB therefore reducing inorganic fertiliser dependency</li> </ul> <p>Apart from that, ambient air monitoring and chimney gas emission by third party were also conducted by the mill to monitor the level of CO, SO<sub>2</sub> and NO<sub>2</sub>. The following reports were verified:</p> <ul style="list-style-type: none"> <li>• EIH1912(157-158)GOMSB(AMB) dated 2/1/2020</li> <li>• EIH1912(155)/GOMSB(BOI4) dated 2/1/2020</li> <li>• EIH1912(156)/GOMSB(INC) dated 2/1/2020</li> <li>• EIH1908(006-007)GOMSB(AMB) dated 22/8/2019</li> <li>• EIH1908(008)/GOMSB(BOI4) dated 22/8/2019</li> <li>• EIH1906(031-032)GOMSB(AMB) dated 28/6/2019</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>• EIH1903(054-055)GOMSB(AMB) dated 20/3/2019</li> <li>• EIH1903(053)/GOMSB(INC) dated 20/3/2019</li> <li>• EIH1903(052)/GOMSB(BOI4) dated 20/3/2019</li> </ul> <p>Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4 which is submitted to the RSPO Secretariat. Based on verification of various records such as Lintramax system and store issuance records, the data reported in the RSPO PalmGHG Calculator was accurate.</p>	
7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Major compliance -</p>	Not applicable since no new development by the certification unit.	Not applicable
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Major compliance -</p>	Other significant pollutant identified is the smoke emission from boiler operation. The mill currently is using multi-stage dust cyclone to minimise the pollutant. Monitoring of quality is done through regular stack sampling. Verification of the stack sampling reports shows that the mill complied with the regulated limit.	Complied
<b>Criterion 7.11</b>			

Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning. - Major compliance -	As per Zero Burning Policy dated 10 August 2011, there shall be no open burning of any kind at operating unit except where deemed necessary with prior approval of the relevant parties or authorities.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	The management already establish regarding to fire prevention standard operating procedure and control the measure such as warning signs at land clearing area and scheduled for patrolling of replanting area, estate boundary area during prolong dry season and also install stop off to retain water at 50 cm to 60 cm in the field for keep the soil moisture and prevent fire outbreak occurred.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Due to fire prevention and control measure, during stakeholder meeting dated 26 Dec 2019 management inform the stakeholder regarding to zero burning policy. This meeting involve the interested parties such as smallholder, authorities, contractor, and others.	Complied
<b>Criterion 7.12</b>			
Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Major compliance -	Not applicable since there is no land clearing after November 2005.	Complied
7.12.2	<b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:	The CU had re-assessed to collate information relating to HCV. The assessment contained information of both planted area and relevant wider landscape-level, and result of HCV was obtained. There were 2 separate	Complied

	<p>7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>7.12.2b Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b> Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Major compliance -</p>	<p>reports prepared by the HCV assessors 1 each for the Southern region and Central Region (conducted in Feb-Mar 2010) covering the mill/estates audited i.e. GAPOM, GTE, GTME and GSGE. The report of assessment contained in "High Conservation Value (HCV) Final Report (Version 2.0), 02 Jan 2015" by MNS Malaysian Nature Society. The following aspects were assessed:</p> <ul style="list-style-type: none"> <li>- Area of HCV-Shared management of forest reserve and boundary areas/buffer zones</li> <li>- The presence of large mammals and birds and how they are protected from poaches.</li> <li>- IPM: use of plants to attract parasitoids to control bagworms &amp; barn owls for rats management and success</li> </ul> <p>Drainage and the conditions. Determining the presence of fishes as a bio-indicator of water health</p>	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable since there is no land clearing after November 2005.	Not applicable
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>The HCV management plan to protect and enhance HCVs and other conservation areas is developed, implemented and available for reviewed. The latest monitoring was done on Jan 2020. This management plan will be reviewed annually by management latest reviewed was on December 2019.</p>	Complied



	- Major compliance -		
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -	Not applicable since there is no land clearing after November 2005.	Not applicable
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	. The assessment contained information of both planted area and relevant wider landscape-level, and result of HCV was obtained. The report of assessment contained in "High Conservation Value (HCV) Final Report (Version 2.0), 02 Jan 2015" by MNS Malaysian Nature Society. A programme to regularly educate the workforce about the status of RTE species was available for reviewed. Latest training to educate workforce was on Nov 2019.	Complied
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	The latest monitoring was done on Jan 2020. This management plan will be reviewed annually by management latest reviewed was on December 2019.	Complied
7.12.8	<b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	Not applicable since there is no land clearing after November 2005.	Not applicable

	- Major compliance -		
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**Appendix B: Approved Time Bound Plan**

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of January 2020	Any unresolved non-compliances
1	Genting Plantations (WM) Sdn Bhd & Setiamas Sdn Bhd(100%)for estates  Genting Oil Mill Sdn Bhd (100%) for mill	Genting Sri Gading Estate,	Supply base for Genting Ayer Item Oil Mill, Johor, Malaysia	Dec,2014	Certified	None
2		Genting Sungei Rayat Estate,				
3		Genting Kulai Besar Estate,				
4		Genting Tanah Merah Estate,		Dec,2015		
5		Genting Tebong Estate,		July, 2015		
		Genting Sepang Estate		Feb, 2020		
	Genting Cheng Estate		"Extension of Scope" audit due to merger with Genting Tebong Estate			
6	Genting Plantations (WM) Sdn Bhd (100%)for estates	Genting Selama Estate, Kedah, Malaysia		July 2019	Certified	None

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of January 2020	Any unresolved non-compliances
7	Genting SDC Sdn Bhd (100%)	Genting Sabapalm Estate, Sabah, Malaysia	Supply base for Genting Sabapalm Oil Mill, Sabah, Malaysia	Aug,2015	Certified	None
8	Genting Tanjung Bahagia Sdn Bhd (100%) for estates	Genting Tanjung Estate, Sabah, Malaysia	Supply base for Genting Tanjung Oil Mill, Sabah, Malaysia	Aug,2016	Certified	None
9		Genting Tenegang Estate, Sabah, Malaysia				
10		Genting Layang Estate, Sabah, Malaysia				
11		Genting Bahagia Estate,				
12	Landworthy Sdn Bhd (84%)	Genting Landworthy Estate, Sabah, Malaysia				
13	Genting Tanjung Bahagia Sdn Bhd (100%) for estates	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah Oil Mill, Sabah, Malaysia	2020		Concept Note for RACP to be re-submitted to RSPO.
14		Genting Permai Estate, Sabah, Malaysia				
15		Genting Kencana Estate, Sabah, Malaysia				

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	Status as of January 2020	Any unresolved non-compliances	
16	Genting SDC Sdn Bhd ( 100%) for estate and mill	Genting Jambongan Estate, Sabah, Malaysia Supply base for Genting Jambongan Oil Mill, Sabah, Malaysia	Sept 2019	Certified	None	
17	Genting Plantations Bhd Wawasan Land Progress Sdn Bhd (100%)	Genting Sekong Estate, Sabah, Malaysia Supply base for Genting Trushidup Oil Mill, Sabah, Malaysia	Sept, 2017	Certified	None	
18	Asiaticom Sdn Bhd ( 100%) Sawit Sukau Usahasama Sdn Bhd(56%)	Genting Suan Lamba Estate, Sabah, Malaysia				
19	PT Sepanjang Intisurya Mulia (70%)	Mulia 1 & 2 Mulia 3 & 4 Mulia 5 & 6 SISM Plasma	Supply base for Mulia Oil Mill, Kalimantan, Indonesia	Oct, 2017	Certified	None  PT SMA (1k) – NPP submitted for 30 days public notification ( 30 April 2020)
20	PT Sawit Mitra Abadi (70%)	Abadi 1 & 2 Abadi 3 & 4 SMA Plasma				

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	Status as of January 2020	Any unresolved non-compliances	
21	Genting Plantations Berhad (100%)	Genting Mewah Estate, Sabah, Malaysia	Supply base for Genting Mewah Oil Mill, Sabah, Malaysia	Mar, 2017	Certified	None
22	Genting Plantations (WM) Sdn Bhd (100%)	Genting Bukit Sembilan Estate, Kedah, Malaysia		July, 2017	Certified	None
23	Knowledge One Investment Pte Ltd (85%)-PT Kharisma Inti Usaha (KIU)	KIU 1 KIU 2 KIU 3 KIU 4	Supply base for KIU Oil Mill	Dec, 2021		NPP in progress. HCV report being reviewed by HCVRN.  HCSA report to be reviewed by HCSA
		KIU Plasma				
24	PT Agro Abadi Cemerlang (70%)	AAC 1 & 2 AAC 3 & 4	Supply base for AAC Oil Mill*	Oct, 2021		HCSA report under review by HCSA.  NPP completed
		AAC Plasma				
25	PT Surya Agro Palma (70%)	SAP Estate 1 SAP Estate 2, 3 & 4 SAP Estate 5 & 6				In process of obtaining HGU.  HCSA report in progress.
		SAP Plasma				

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	Status as of January 2020	Any unresolved non-compliances	
26	PT Globalindo Agung Lestari (60%)	Lamunti Barat Estate Lamunti Timur Estate I & II Mengkatip Estate I & II Bakuta Estate Plasma Timur & Barat	Supply base for Globalindo Oil Mill, Kalimantan, Indonesia	Nov, 2021		In process of obtaining HGU  HCSA report in progress.
27	PT United Agro Indonesia (60%)	PT UAI 1 & 2	Supply base for UAI Oil Mill, Kalimantan, Indonesia	Oct, 2022		In process of obtaining HGU NPP for PT UAI in progress. HCSA report in progress.
		UAI Plasma				
28	PT Susantri Permai (95%)	Puroh Estate Masaha Estate Zircon Hill Estate	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia	Oct, 2023		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		SP Plasma		Oct, 2023		
29	PT Dwie Warna Karya ( 95%)	Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate	Supply bases for Golden Hill Oil Mill, Kalimantan Indonesia	Oct , 2023		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		DWK Plasma				
30	PT Kapuas Maju Jaya (95%)	Waterfall Estate I & II Muhun Estate I & II Talawang Estate I & II	Supply bases for KMJ Oil Mill,	Oct,2023		In the process of obtaining Forest Release and Forest

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of January 2020	Any unresolved non-compliances
		KMJ Plasma	Kalimantan Indonesia			Exchange prior to HGU application.
31	PT Citra Sawit Cemerlang (70%)	Cemerlang Estates	Supply base for CSC Oil Mill*	Oct,2023		In process of obtaining HGU.  HCSA report under review by HCSA.
		CSC Plasma				
32	PT Palma Agro Lestari Jaya (70%)	PALJ Estates	Supply base for PALJ Oil Mill*	Aug,2023		In process of obtaining HGU.  HCSA report under review by HCSA.  NPP completed.
		PALJ Plasma				



**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in 2019 for Genting Ayer Item Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2019 for Genting Ayer Item Palm Oil Mill and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.70
PKO	0

Extraction	%
OER	20.74
KER	5.08

Production	t/yr
FFB Process	181,126.30
CPO Produced	37572.95
PKO Produced	0

Land Use	Ha
OP Planted Area	10992.92
OP Planted on peat	338.03
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>11,330.95</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	84714.25	0.47	0.00	0.00	0.00	0.00	84714.25	0.47
CO <sub>2</sub> Emission from fertilizer	9709.87	0.05	0.00	0.00	0.00	0.00	9709.87	0.05
NO <sub>2</sub> Emission	2445.20	0.22	0.00	0.00	0.00	0.00	2445.20	0.22
Fuel Consumption	2013.9	0.01	0.00	0.00	0.00	0.00	2013.9	0.01
Peat Oxidation	17834.91	0.10	0.00	0.00	0.00	0.00	17834.91	0.10
<b>Sink</b>								
Crop Sequestration	-78589.86	-0.43	0.00	0.00	0.00	0.00	-78589.86	-0.43
Conservation Sequestration	0	0	0.00	0.00	0.00	0.00	0	0

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<b>Total</b>	<b>45317.99</b>	<b>0.25</b>	0.00	0.00	0.00	0.00	<b>45317.99</b>	<b>0.25</b>
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\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	33692.69	0.19
Fuel Consumption	430.89	0.00
Grid Electricity Utilization	0	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>34123.57</b>	<b>0.19</b>

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

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

\*This mill has no kernel crusher operation.

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

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

**Appendix D: Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	Mar-19	17,120.36	0	17,120.36
2	Apr-19	11,704.76	0	11,704.76
3	May-19	17,128.12	0	17,128.12
4	Jun-19	15,827.63	0	15,827.63
5	Jul-19	16,259.31	0	16,259.31
6	Aug-19	15,800.75	0	15,800.75
7	Sep-19	14,642.25	0	14,642.25
8	Oct-19	14,397.43	0	14,397.43
9	Nov-19	12,340.07	0	12,340.07
10	Dec-19	11,634.20	0	11,634.20
11	Jan-20	11,022.46	0	11,022.46
	<b>Total</b>	<b>157,877.34</b>	<b>0</b>	<b>157,877.34</b>

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	Mar-19	3,566.34	898.24
2	Apr-19	2,274.50	576.63
3	May-19	3,536.45	882.84
4	Jun-19	3,190.52	779.78
5	Jul-19	3,377.26	836.06
6	Aug-19	3,402.43	845.77
7	Sep-19	3,167.46	783.07
8	Oct-19	2,996.20	739.36
9	Nov-19	2,595.24	628.54
10	Dec-19	2,346.06	540.53
11	Jan-20	2,239.32	562.21
	<b>TOTAL</b>	<b>32,691.78</b>	<b>8,073.03</b>

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<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	A	RSPO_PO10000001XX	4,359.88	
2	B	RSPO_PO10000001XX	16,304.72	
3	C	RSPO_PO10000001XX	2,301.55	
4	D	RSPO_PO10000019XX	601.00	
5	E	RSPO_PO10000000XX	300.41	
6	F	RSPO_PO10000071XX		949.72
7	G	RSPO_PO10000029XX		6,908.77
			23,867.56	7,858.49

<b>D. Records of CPO &amp; PK Sold under other schemes to Buyers since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	H	ISCC	1,797.25	
2	I	ISCC	898.15	
3	J	ISCC	5,997.91	
			8,693.31	

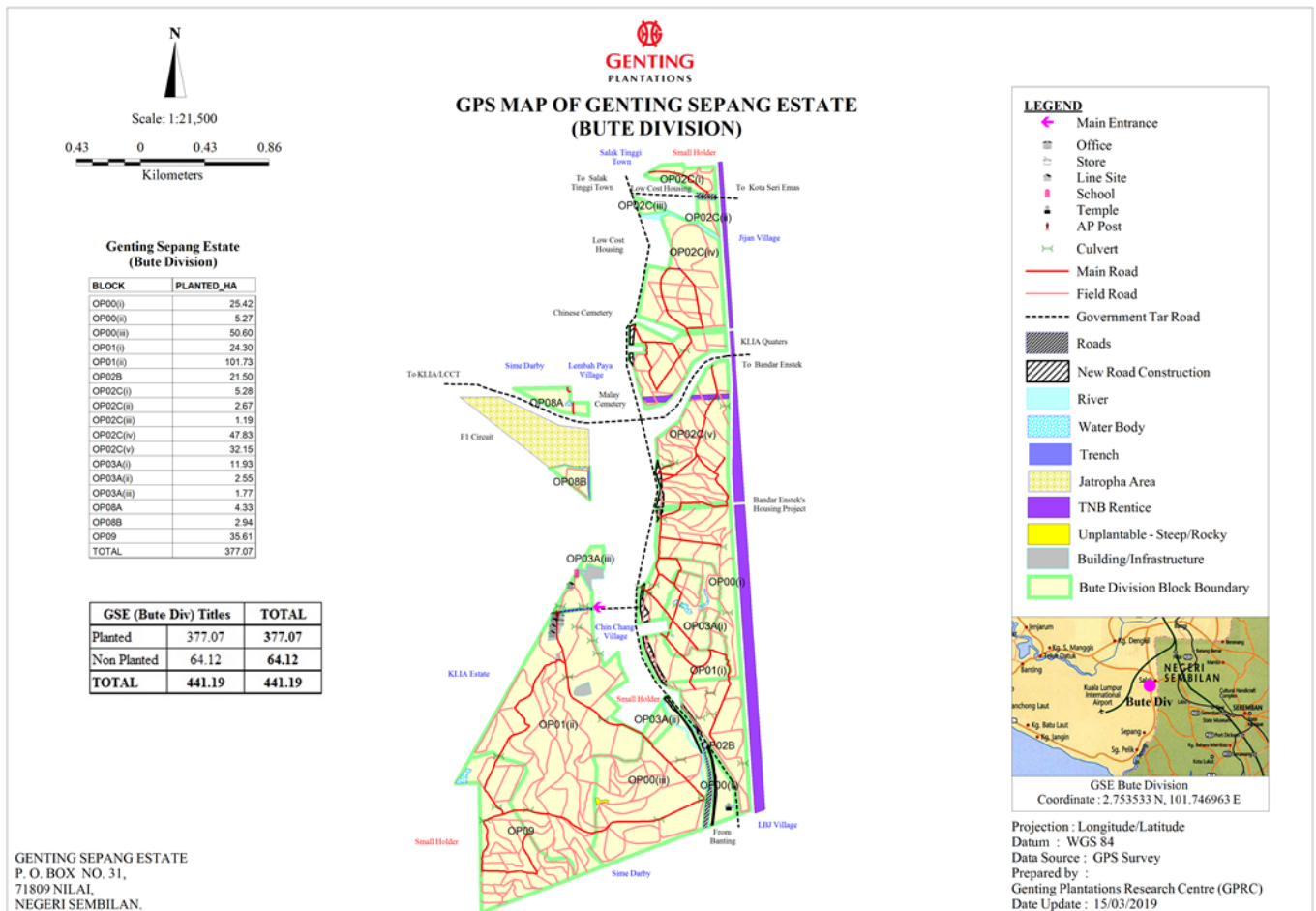
<b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (if any)</b>				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	A-D	0	205.85	

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

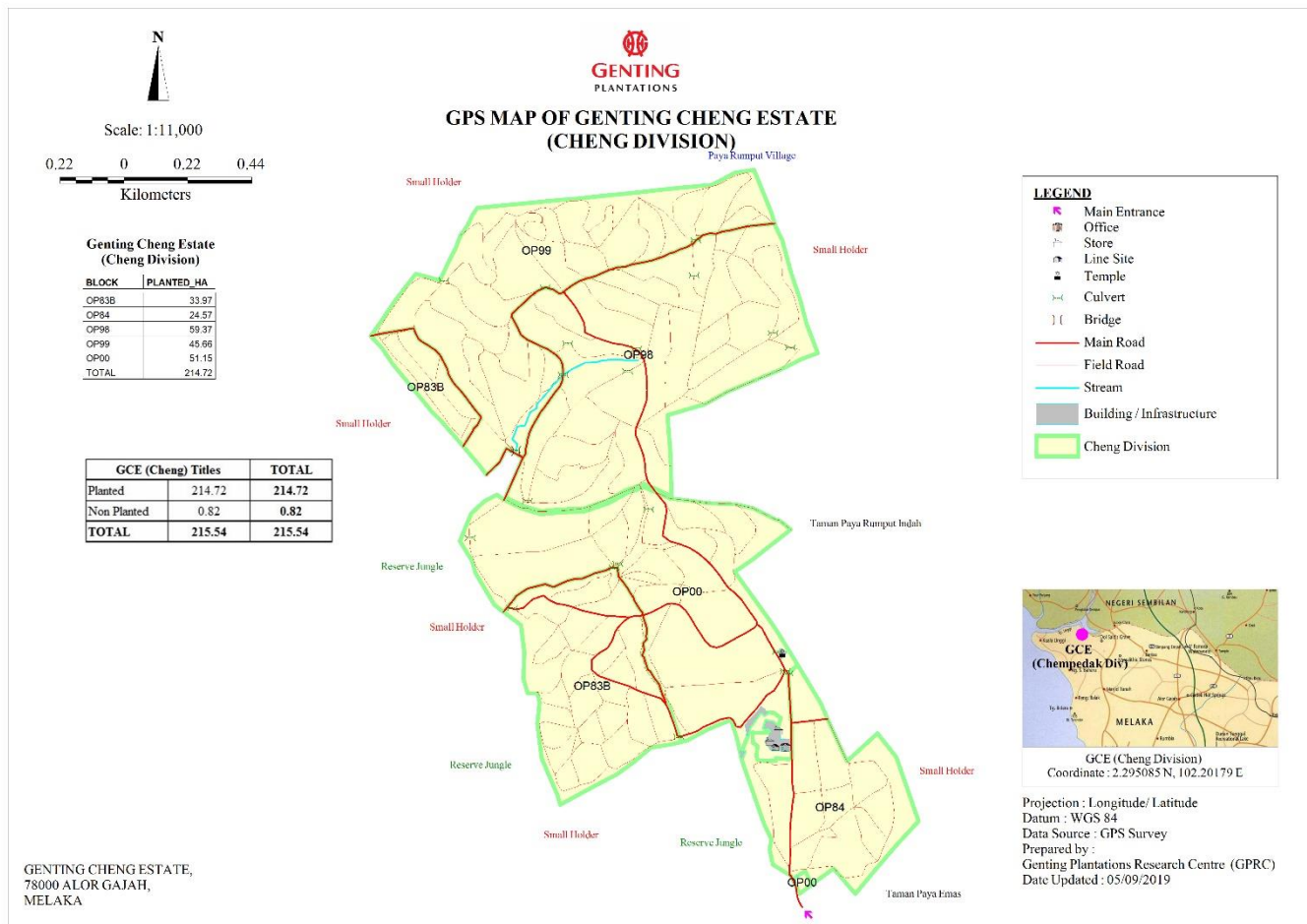
**Appendix E: Location Map of Genting Ayer Item Palm Oil Mill Certification Unit and Supply bases**



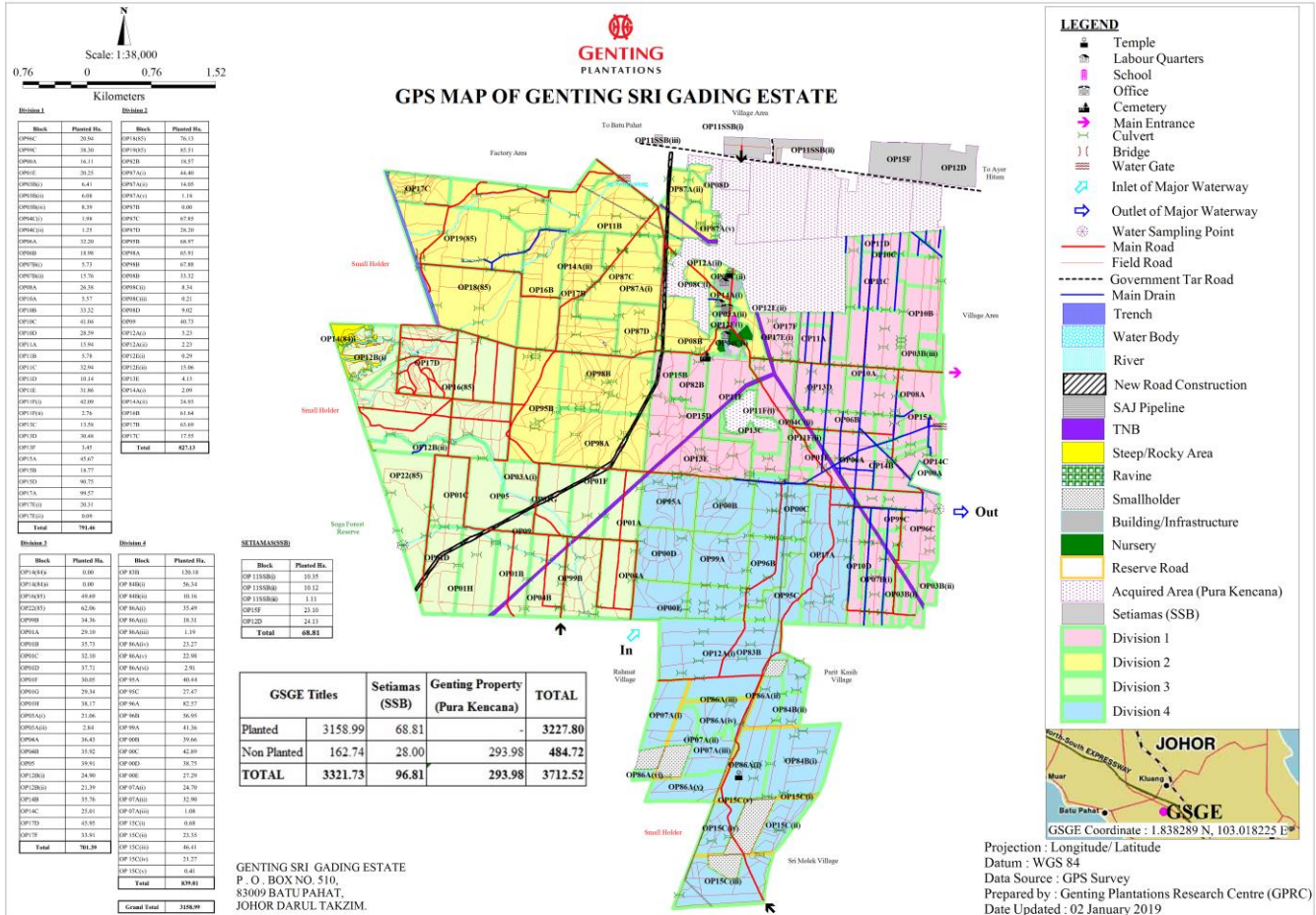
**Appendix F: Genting Tanah Merah estate (Sepang Division) Field Map**



**Appendix G: Genting Tebong estate (Cheng Division) Field Map**



Appendix H: Genting Seri Gading Estate Field Map





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

Nil

## Appendix J: List of Abbreviations

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