PF441 RSPO P&C Public Summary Report Revision 11 (Sept 2020)

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

□ Initial Assessment

⊠ Annual Surveillance Assessment (2)

Recertification Assessment (Choose an item.)

□ Extension of Scope

Client Company name (Parent Company): FGV Holdings Berhad

Client company Address:

Level 20 West, Wisma FGV Jalan Raja Laut 50350 Kuala Lumpur, Malaysia

Certification Unit:

FGV Palm Industries Sdn Bhd – Keratong 3 Palm Oil Mill

Location of Certification Unit:

Off Lebuhraya Tun Razak 26900 Bandar Tun Razak, Pahang, Malaysia

Date of Final Report: 12/03/2021

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Section 1: Scope of the Certification Assessment

1. Company Details					
Parent Company	FGV Holdings Berhad				
RSPO Membership Number	1-0225-16-000-00 Membership 27/12/2016 Approval Date				
Address	Level 20 West, Wisma FGV Jalan	Raja Laut, 503	50 Kuala L	umpur, Malaysia	
Palm Oil Mill / Group Manager / Estate (Certification Unit)	FGV Palm Industries Sdn Bhd – Keratong 3 Palm Oil Mill				
Location / Address	Off Lebuhraya Tun Razak 26900	Bandar Tun Raz	zak, Pahar	ng, Malaysia	
Website	https://www.fgvholdings.com/home/				
Management Representative	Ameer Izyanif Bin Hamzah E-mail ameer.h@fgvholdings.com				
Telephone	03-27890497	Facsimile	03-2789	0440	

2. Certification Information

Certificate Number	RSPO 693213	Date of First Certification	25/03/2019			
		Certificate Start Date	25/03/2019			
		Certificate Expiry Date	24/03/2024			
Scope of Certification	Palm Oil and Palm Kernel Produ	uction				
Visit Objectives	1) Determination of the confo with audit criteria.	, , , , , , , , , , , , , , , , , , , ,				
		the management system to ensu- regulatory and contractual requ	-			
Assessment Cycle	Initial Assessment					
	□ Recertification Assessment (Choose an item.)				
	☑ Annual Surveillance Assessn	nent (RA Choose an item. ; AS	A 2)			
	□ Scope Extension					
Applicable Standards	□ RSPO P&C 2018 for the Prod	uction of Sustainable Palm Oil				
	⊠ Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil					
	Group Certification 2016					
	RSPO Independent Smallholders Standard 2019					
Supply Chain Module	□ Identity Preserved ⊠ Mass B	alance				

3. Other Certifications						
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date			
MSPO 693214	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	05/12/2023			
MSPO 693216	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3	BSI Services Malaysia Sdn Bhd	05/12/2023			

4. Location(s) of Mill & Supply Bases						
Name GPS Coordinat						
(Mill / Supply Base)	Location	Latitude	Longitude			
FGVPISB Keratong 3 Palm Oil Mill	Kilang Sawit Keratong 3,Off Lebuhraya Tun Razak, 26900 Bandar Tun Razak, Pahang, Malaysia	2° 55′ 44.05″ N	102° 56′ 04.08″ E			
FGVPM Keratong 11 Estate	Ladang Felda Keratong 11 26900 Bandar Tun Razak, Pahang, Malaysia	2° 53′ 08.00″ N	103° 01′ 05.00″ E			

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
FGVPM Keratong 11	984.24	-	212.16	1,196.40	82.27
Total	984.24	-	212.16	1,196.40	82.27

6. Plantings & Cycle							
Fatata	Age (Years)				N	. .	
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Mature	Immature
FGVPM Keratong 11	156.29	130.99	129.50	567.46	-	827.95	156.29
Total (ha)	156.29	130.99	129.50	567.46	-	827.95	156.29



7. Certified Tonnage of FFB (Own Certified Scope)					
	Tonnage / year				
Estate	Estimated		Actual (Dec 2019 – Nov 2020)		
Little	(Mar 2020 – Feb 2021)	Previous license period (Dec 2019 – Feb 2020)	<i>Current license period</i> (Mar 2020 – Nov 2020)	(Mar 2021 – Feb 2022)	
FGVPM Keratong 11	14,320.00	1,839.37	8,234.14	10,192.00	
Total	14,320.00		10,073.51	10,192.00	

8. Certified Tonnage of FFB (from other certified unit(s))						
	Tonnage / year					
Estate	Estimated	Actual (Dec 2019 – Nov 2020)		Forecast		
Listate	(Mar 2020 – Feb 2021)	Previous license period (Dec 2019 – Feb 2020)	Current license period (Mar 2020 – Nov 2020)	(Mar 2021 – Feb 2022)		
Nil	N/A			N/A		
Total						

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)						
		Tonnage / year				
Independent FFB	Estimated	Act - Dec 2019)	Forecast			
Supplier	(Mar 2020 – Feb 2021)	Previous license period (Dec 2019 – Feb 2020)	<i>Current license period</i> (Mar 2020 – Nov 2020)	(Mar 2021 – Feb 2022)		
FELDA & FTP	NA	32,663.68	137,624.34	NA		
Private Supplier	NA	2,693.24	66,837.44	NA		
Total	NA		239,818.70	NA		

10. Certified Tonnage						
	Estimated	Act - Dec 2019)	Forecast			
	(Mar 2020 – Feb 2021)	Previous license period (Dec 2019 – Feb 2020)	<i>Current license period</i> (Mar 2020 – Nov 2020)	(Mar 2021 – Feb 2022)		
Mill Capacity:	FFB	FF	В	FFB		
40 MT/hr	14,320.00	1,839.37	8,234.14	10,192.00		
	CPO (OER: 21%)	CPO (OER	: 19.96%)	CPO (OER: 21.00%)		
	3,007.20	319.70	1,690.61	2,140.32		
	PK (KER: 5.15%)	PK (KER:	4.98%)	PK (KER: 5.20%)		
	737.48	75.92	426.04	529.98		

11. Actual Sold Volume (CPO)						
Current License period (Mar 2020 – Nov 2020)						
	DCDO Cartificad	Other Schemes Certified				
	RSPO Certified	ISCC	Others	Conventional	Total	
CPO (MT)	-	-	-	1,690.61	1,690.61	
Previous License period (Dec 2019 – Feb 2020)						
CPO (MT)	-	-	-	319.70	319.70	

12. Actual Sold Volume (PK)							
Current License period (Mar 2020 – Nov 2020)							
	DCDO Contified	Other Schen	nes Certified	Conventional	Tatal		
	RSPO Certified	ISCC	Others	Conventional	Total		
PK (MT)	333.33	-	-	92.71	426.04		
Previous License period (Dec 2019 – Feb 2020)							
PK (MT)	-	-	-	75.92	75.92		

13. Independent Smallholders Certification Claims					
	Credit	Physical Volume (MT)			
IS-CSPO	-	-			
IS-CSPKO	-	-			
IS-CSPKE	-	-			



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 (<u>Nicholas.Cheong@bsigroup.com</u>) Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 84,000 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.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 30/11/2020 to 03/12/2020. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The Critical NC close out assessment was conducted remotely on 22/02/2021. The audit programs are included in Section 2.3.

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 Malaysia National Interpretation 2019 for the Production of Sustainable Palm Oil was used to guide the assessment 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 (and smallholders) of its supply base.

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of



workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

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

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

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

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

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

Assessment Program

Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 4)	Year 5 (ASA 5)
FGVPISB Keratong 3 Palm Oil Mill	~	\checkmark	\checkmark	\checkmark	~
FGVPM Keratong 11	✓	\checkmark	\checkmark	\checkmark	\checkmark

Tentative Date of Next Visit: December 1, 2021 - September 3, 2014

Total No. of Mandays: 9.0



2.2 **BSI Assessment Team:**

Team Member Names	Role	Qualifications (Short description of the team members)
Valence Shem (VSH)	Team Leader	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, MSPO 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, MSPO Awareness Training in 2014 and ISO 45000 Lead Auditor Course in 2019. During this assessment, he covers the aspects on legal, mill best practices, good agriculture practice, occupational safety and health. Able to communicate in Bahasa Malaysia and English.
Hu Ning Shing (HNS)	Team Member	She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she covers the aspects on legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English.
Mohamad Razin Bin Bakal (MRB)	Team Member	Holding a degree in Accountancy from University Putra Malaysia, Serdang, Malaysia and possessing 17 years of working experience in numerous fields in Malaysia (West Malaysia, Sarawak, Sabah), Africa and Indonesia. Total of 3 years' experience in finance & administrative sector and 14 years in the oil palm plantation sector. In plantation, he had been exposed and personally experience in managing all the oil palm process inaugurating from the initial and planning stage, land clearing from jungle to OP, replanting, planting of oil palm seedling, nursery, immature, mature, harvesting, and felling. Aside from estate operation, he also involved in MSPO and RSPO assessment since November 2018. Attended and certified the Lead Auditor Course MSPO 2530:2013 (P&C & SCCS), ISO 14001:2015, ISO 9001:2015 with SIRIM STS and RSPO 2018 (PnC & SCCS) with Checkmark training. During this assessment, he covers the aspects on legal, environmental, wastes management and HCV. Able to communicate in Bahasa Malaysia and English.

Accompanying Persons:

Name	Role
-	-

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2.3 Assessment Plan

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

Date	Time	Subjects	VSH	HNS	MRB
	0830-0900	 Opening meeting: Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation) 	~	~	~
	0900-1300	Keratong 3 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.	✓	~	~
Monday 30/11/2020	1000-1300	Stakeholder consultations: Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.	-	~	-
	1300-1400	Lunch break			
	1400-1630	Keratong 3 POM Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	✓	~	~
	1630-1700	Interim closing briefing			
	0900-1230	Keratong 3 POM Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	✓	~	~
	1230-1300	Interim closing briefing			
Tuocdov	1300-1400	Lunch break			
Tuesday 01/12/2020	1400-1630	Keratong 11 Estate 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			
Wednesday 02/12/2020	0900-1300	Keratong 11 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	Keratong 11 Estate 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			
Thursday 03/12/2020	0900-1200	Keratong 3 POM <u>RSPO Supply Chain</u> Site visit: Incoming of FFB and outgoing of CSPO & CSPK – weighbridge, ramp, storage area, loading bays, etc. Documentation review: RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	✓	-	-
	1200-1230	Audit team discussion & preparation for closing meeting	\checkmark	\checkmark	~
	1230-1300	Closing meeting			

Remote Critical NC close out assessment plan:

Date	Time	Subjects	VSH	ICT
	0900-0915	Opening briefing by the audit team leader	~	
Monday	0915-1030	Keratong 3 POM Verification of effective implementation of corrective actions for NCR 1992765-202010-M2	✓	Microsoft
22/2/2021	1030-1045	Break		Teams
	1045-1230	Keratong 11 Estate Verification of effective implementation of corrective actions for NCR 1992765-202010-M1	✓	

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- $\boxtimes\;$ FGV Holdings Berhad Multiple Management Units / Time Bound Plan
- \square RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- $\hfill\square$ RSPO Group Certification Standard 2016
- \boxtimes Malaysia National Interpretation 2019 for RSPO P&C 2018
- □ Independent Smallholder Standard 2019

3.2 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	Yes, the plan include all current subsidiaries, estates and mills. As per time bound plan FY 2020.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	33 complexes have been certified from 2017-2019 : POM Selancar 2B, Aring, Keratong 9, Lepar Utara 6, Maokil, Bukit Sagu, Krau Kemasul, Selendang, Lepar Hilir, Kechau B, Palong Timur, Besout, Chini 3, Triang, Neram, Jerangau Baru, Chalok, Adela, Kota Gelanggi, Tenggaroh, Keratong 2, Nitar, Chiku, Belitong, Bukit Kepayang, Kerteh, Kulai, Serting Hilir, Waha, Penggeli, Keratong 3 & Jengka 21. Remaining 33 mills have undergone internal audit and 1 mill (KKS Serting) has completed external audit waiting for certification. As per the Complaints Panel (CP) decision on 13/01/2020, all new certification under FGV is suspended.	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. There are no new acquisition.	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, changes to the time-bound plan since the last audit.	Yes
Have there been any isolated lapses in implementation of the plan? If yes a Minor non- compliance shall be raised	There are no lapses in implementation of the plan.	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 Major non- compliance shall be raised	There were	Yes			
Un-Certified Units or Holding					
 No replacement after dates defined in NIs Criterion 7.3: Primary forest. Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	7 LUCA sub no concept one issue r clearance ir	mitted to note or co eported n Kalimar	RSPO and al ompensation oy Chain Re	^F primary forest area. There were I of them have been passed with plan required. However, there is search Reaction regarding HCV ready brief this issue to RSPO n.	Yes
Any new plantings since	New plantin	gs since J	anuary 1 st 20	010 involved the following areas:	Yes
January 1 st 2010 shall comply	Area	ha	Status	Reference	
with the RSPO New Plantings Procedure.	FGVPM Tembangau 05 Estate FGVPM Chegar Perah 02 Estate FGVPM Selendang 03 Estate FGVPM Bukit Sagu 08 Estate Tawai 01	45.84 59.84 97.14 61.54 2,740.11	HCVRN Closed – no go HCVRN Closed – Proceed with land clearing. Did not go NPP as this is certified area	https://hcvnetwork.org/reports/hcv- chegar-perah-02-estate-bukit-sagu- 08-estate-tembangau-05-estate- selendang-03-estate-malaysia/	
	Tawai 01 Estate Tawai 02 Estate	2,740.11	published on 20 January – not proceed	ladang-tawai-1-and-ladang-tawai-2- fgvp-malaysia/	
			with NPP. The area will be planted with other crop		
	Asian Plantation Limited (APL)	25,325.0	HCVRN Closed – proceed with planting subjected to HCSA report for Grand Performance	https://hcvnetwork.org/reports/felda- global-venture-miri-division-sarawak- state-malaysia/	

		,1
	No issue in the uncertified area (Tawai 01, Tawai 02 & APL) since the new planting was cancelled for Tawai 01 & Tawai 02 and not proceed yet for APL.	
	For current certified area which involved estate within Bukit Sagu Palm Oil Mill Complex i.e. FGVPM Bukit Sagu 08 Estate, no NPP required since Scenario 5 of NPP (new plantings within an RSPO- certified management unit) applies.	
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.	Based on RSPO RACP tracker updated 1 November 2019, no any land conflicts issue reported within FGV Holdings Berhad except for the parent company of FGV i.e. Felda with a total of 7 Mangement Unit with potential liability and all 7 LUCAs been submitted and completed its review.	Yes
Any Labor disputes are being	Synopsis	Yes
resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	On the 26th of July 2015, WSJ ran an article by Syed Zain Al – Mahmood alleging that Felda has breached labour conditions in its plantations. The allegations mainly say that forced labour is being used and the workers are not paid minimum wages. Further, it is alleged that their health and working conditions is are neglected and also that their employers withheld their passports.	
	<u>Remarks</u>	
	29 July 2015 - 12 NGOs urged the RSPO to conduct a transparent investigation into Wall Street Journal's findings of forced labour, human trafficking, and other human and labour rights violations especially on RSPO member FELDA's plantations.	
	The Complaints Panel in its meeting on August 2015, decided that the member, Felda, be investigated on the issues raised by the WSJ article. The RSPO Secretariat will conduct an independent assessment to investigate the report on labour condition on all RSPO members. Malaysia would be the first country, where the assessment would be done.	
	RSPO release the following statement on its website:	
	http://www.rspo.org/news-andevents/news/3rd-update- rsporesponse-to-thereport-titled-palmoil-migrant-workers-tell- ofabuseson-malaysian-plantations-published-by-thewall-street- journal-on-	
	26 th July-2015 7 March 2016 - RSPO Complaints Panel reviewed the independent assessment reports and decided to suspend Pasoh palm oil mill owned by Felda until full clearance is given based on the re-audits.	
	10 March 2016 - FGV had a meeting with RSPO regarding the ASI report and suspension decision by RSPO.	

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18 March 2016 - FGV sent complaint acknowledgment letter to RSPO. FGV will submit 12 month time bound action plan addressing all the issues relating to ASI report.	
6 May 2016 - FGV withdraws its RSPO Principles and Criteria certificates.	
4 July 2016 - FGV submits the action plan to RSPO.	
22 August 2016 - Secretariat has reviewed the action plan and sent the action plan back to the company for further clarification.	
20 October 2016 - Secretariat to wait for the updated action plan from the company.	
19 December 2016 - Secretariat to appoint an independent expert to verify action plan and set a time bound plan.	
22 March 2017 - Secretariat continues searching for an independent expert to review the action plan.	
31 May 2017 - Secretariat shares the action plan with the Complaints Panel and continues monitoring the case.	
5 October 2017 - FGV updated the Action Plan and upload to FGV website on the same day. A copy also sent to RSPO for their acknowledgement. Meeting with RSPO secretariat on 11 January 2017 at RSPO Bangsar, RSPO Compensation Panel would like to review the WSJ action plan and as suggested by RSPO CP a group of labour experts (lawyer and NUPW union org with 1 CP member as observer) will be engaged to verity the FGV and FELDA WSJ Action Plan. It were expected to have one operation unit for both FELDA and FGV in this verification exercise on the ground especially involving the policy and implementation. The verification is expected to be in this coming March 2018 and RSPO CP will share the scope and plan for the verification assessment once it is ready.	
25 July 2017 (CP Meeting) -Secretariat to proceed with the review of the Action Plan	
24 August 2017 (CP Meeting). 1) CP to wait for the report of the Review of FGV Action Plan; 2) Secretariat to work with the Technical department to develop a formula for identifying the number of units for verification; 3) Secretariat to start identifying a team of experts for the verification exercise.	
26 September 2017 (CP Meeting) -Secretariat to follow up with FGV on the 2 reports.	
23 October 2017 (CP Meeting) - Secretariat to send CP's response to the Company.	
21 November 2017 (CP Meeting) -Verification exercise to be carried out once the schedule is confirmed with the verification team.	
21 December 2017 (CP Meeting) - Verification exercise to be carried out in March.	

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	24 January 2018 (CP Meeting) -TOR for the verification exercise to be drafted. Further details, please refer to:	
Anno Langlinger anno 19	https://rspo.org/members/5855 There is 1 issue happen in FGVPM Palong Timur 04 (Now FGVPM	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Palong Timur 05) and the details is elaborated below: 1. FGVPM PALONG TIMUR 04 (NOW FGVPM PALONG TIMUR 05): Claims on 19.06.2012 with value of summon RM61,968.60 and summon status is Court Appeal.	103
	Auditor Verification: During partial audit, 1 issue with DOE in FPISB Selancar 2A POM is sighted. Summon no : SJ 53-4/2016 ; Date 14.04.2016 in Mahkamah Seksyen Kuantan.	
	Fixed for Trial on 01.03.2017, 02.03.2017 and 03.03.2017.	
	All process still in progress and CB will verify this issue in next audit or during audit in this mill.	
Did the company conduct internal audit against the	Yes, there have positive assurance statement from internal certification unit.	Yes
uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes, at the current status only 34 complexes already have internal audit in year 2018/2019. Seen the internal audit done by Sustainability Compliance and Certification Department(SCCD).	
Have there been any stakeholder (including NGO) consultation conducted?	Stakeholder comments are recorded in Stakeholder report 2018. No negative comment from stakeholder. Suggestion and recommendation from stakeholders were taking into consideration.	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.	FGVPISB Keratong 3 POM received FFB from smallholder and independent outgrower. No scheme smallholder under FGVPISB Keratong 3 POM.	NA	

3.4 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During this Assessment there were two (2) Critical; five (5) Minor nonconformities and 5 Opportunity For Improvement raised. The FGV Palm Industries Sdn Bhd – Keratong 3 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 Critical 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			
NCR Ref #	1992765-202010-M1	Clause & Category (Critical / Minor)	3.6.1 (Critical)
Date Issued	03/12/2020	Due Date	03/03/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	22/02/2021
Statement of Nonconformity:	The safe operating procedu	re was not adequately impler	mented.
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	 Ref.: <i>Garispanduan Keselamatan & Kesihatan Pekerjaan</i> (Occupational Safety & Health Guidelines) SOP No. FGVPM/L3/GPK-017, effective from 1/2/2020, <i>Jentera Mengangkut Bahan & Hasil Petanian</i> (Transportation of Materials and Agriculture Crop). There is no evidence that the "<i>Borang Pemeriksaan Kenderaan Ladang</i>" (Farm Tractors Inspection Form) for tractors transporting FFB has been utilized by Keratong 11 Estate as required by the SOP No. FGVPM/L3/GPK-017. 		
Corrections:	 Conduct SOP training to all estate operating machinery driver workers. Issue a letter of instruction to conduct daily inspections on the operating machine and all relevant staff before commencing work using 'Bprang Pemeriksaan Kenderaan Ladang'. Issue a letter of appointment for a local machinery driver who is responsible for carrying out the inspection of mini kubota machinery and record using 'Borang Pemeriksaan Kenderaan Ladang'. Provide a specific log book for each estate operating machinery that records daily inspection activities, periodic maintenance, work activities performed, oil consumption. The logbook of estate operation machinery is checked by the estate 		
	management every month as a method of monitoring SOP compliance.		
Root Cause Analysis:	SOPs are not implemented consistently by project management as there is no enforcement monitoring mechanism and corrective action is implemented immediately to ensure SOPs are complied with by the responsible staff.		

Corrective Actions:	 Officers in charge at the estate management level was given continuous SOP information and training to enhance good understanding. Update the annual training programs by including training programs for all SOPs as well as comprehension assessments to increase understanding of SOP compliance implementation.
	3. Provide a letter of responsibility to the local machinery driver to carry out inspection of the mini kubota machinery and record.
Assessment Conclusion:	 The following evidences were verified: 1) Training records on SOP to machinery drivers dated 24/12/2020 2) Samples of "<i>Borang Pemeriksaan Kenderaan Ladang</i>" (Plantation Vehicles Inspection Form) that had been utilised 3) Copy of the logbook content that shows the "daily inspection records" 4) Samples of the logbook were checked by the estate management 5) Updated annual training programmes for 2021 6) Copy of the letter from the management to the local machinery drivers dated 30/12/2020, instructing the drivers to carry out machinery inspection on regular basis The evidence of correction and corrective actions were found to be adequate to close the major NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment.

Non-conformity			
NCR Ref #	1992765-202010-M2	Clause & Category (Critical / Minor)	3.8.6 (Critical)
Date Issued	03/12/2020	Due Date	03/03/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	22/02/2021
Statement of Nonconformity:	The handling of non-conformities raised from the internal audit was not in accordance to established procedure.		
Requirement Reference:	Internal Audit		
	The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;		
	• Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.		
	effectively implements and maintains the standard requirements within its organisation.		
	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 mill shall maintain the internal audit records and reports.		
Objective Evidence:	Ref.: FGV's Internal Audit Procedure [FGV/ML-1A/L2-Pr11, rev. 0, 1/6/2016], Clause 6.7.2, which reads: " <i>Pihak projek yang diaudit perlu menunjukkan bukti penutupan ketidakpatuhan dalam bentuk dokumentasi dan bukti gambar selewat-lewatnya dua minggu selepas audit dalaman</i> " (The audited project site		

has to show the close-out evidence of non-conformity reports in form of documents and pictures not later than two weeks after the internal audit). The internal audit for RSPO SCCS for Keratong 3 POM was conducted on 17-18/8/2020 by FGV's Sustainability & Environmental Department (SED), Mr. Mohd Yusuf Salbani. He had raised 3 non-conformity reports as a result of the audit. However, there is no evidence that the non-conformity reports have been addressed according to FGV's internal audit procedure.
 Implement sending Email communication with the officer in charge of FVGT and a copy of the SCCS internal audit report is provided for reference and action. Implement the closing action of SCCS internal audit issues as recommended.
The issues stated in the SCCS internal audit report require action from the FGV Traiding Department (FGVT) HQ to make any verification and changes in the RSPO IT system (RSPO palm trace system) which can only be done and controlled by the officer in charge.
There was no communication between the management of the Keratong 3 POM and the officer in charge of the FGV Trading Department (FGVT) in ensuring that the issues found in the internal audit could be taken appropriate action and the SCCS internal audit findings were not included in the separate RSPO P&C internal audit action plan for review.
 The issue of non-compliance findings from SCCS internal audit is included in the RSPO P&C internal audit findings report so that monitoring coordination can be implemented.
 Provide retraining to the relevant SCCS RSPO officers in POM, Internal Audit Procedure [FGV / ML-1A / L2-Pr11, rev. 0, 1/6/2016] so that the officer concerned is more sensitive and complies with the procedures used.
 Reminder letter to the traceability officer appointed for failing to take action and make a reference to ensure that all SCCS internal audit issues are implemented as recommended.
 The following evidences were verified: 1) Copy of the email communication between the mill and FGV Trading Department 2) Copy of the email communication between the mill and the internal auditor that shows the corrective actions and evidence have been accepted/closed by the internal auditor 3) RSPO P&C internal audit findings report that shows the issue of non-compliance findings from SCCS internal audit has been included 4) Retraining record on Internal Audit Procedure [FGV / ML-1A / L2-Pr11, rev. 0, 1/6/2016], dated 7/1/2021 5) A copy of the reminder letter to the traceability officer dated 28/12/2020 The evidence of correction and corrective actions were found to be adequate to close the major NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment.

Non-conformity			
NCR Ref #	1992765-202010-N1	Clause & Category (Critical / Minor)	2.1.2 (Minor)
Date Issued	03/12/2020	Due Date	Next assessment visit
Closed (Yes / No)	No	Date of nonconformity Closure	Open
Statement of Nonconformity:	The mechanism to ensure License Compliance Schedu	compliance with one of the	e conditions in the DOE
Requirement Reference:	A documented system for e a means to track changes to	nsuring legal compliance is ir othe laws and regulations.	n place. This system has
Objective Evidence:	Ref.: <i>Jadual Permatuhan</i> (Compliance Schedule), No. Lesen 005103 issued by Department of Environment, Pahang State– JP/KKS/2020/2021/005103 - <i>Pengurusan Buangan Pepejal Kelapa Sawit</i> (Oil Palm Solid Wastes Management), Clause No. 22. Based on the feedback from Sustainability In charge, the POM Management has		
	the intention to apply for the " <i>Lesen Pelanggaran</i> " (Contravene License) with regards to non-compliance with the location of the EFB storage. However, during the audit assessment, there is no application has been made to the Department of Environment thus far.		
Corrections:	1. Issue reminder letters to responsible staff to ensure legal compliance is taken seriously immediately and involves KPI performance appraisals being assessed.		
	2. POM management prepares EFB management action plans for short term, long term and emergency are available.		
	3. Perform cleaning work and transfer of EFB waste piles to designated drainage areas refer to EFB storage location plan Compliance schedule.		
	4. Appoint a work contract to send the excess EFB to the estate as a action to reduce the EFB stacks are laid in unauthorized areas.		e estate as a action to
Root Cause Analysis:	No firm follow-up action was taken by the POM management to enforce the existing legal compliance mechanism implemented by the responsible officer.		
Corrective Actions:	1. Existing legal compliance mechanisms such as from internal audit reports, work area checklists are taken into account by updating daily actions during the morning meeting on legal compliance issues.		
	Head of the responsible sta	the POM management by taki ff who failed to comply with t action that will affect the eva	the legal requirements
Assessment Conclusion:	The correction and corrective action were accepted. The evidence of effective implementation of the corrective action shall be verified in the next assessment visit.		



Non-conformity			
NCR Ref #	1992765-202010-N2	Clause & Category (Critical / Minor)	2.2.2 (Minor)
Date Issued	03/12/2020	Due Date	Next assessment visit
Closed (Yes / No)	No	Date of nonconformity Closure	Open
Statement of Nonconformity:	Due diligence was not avail	able.	
Requirement Reference:	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.		
Objective Evidence:	At Keratong 11 Estate, a contractor was appointed by the management to transport FFB from ramp to mill has signed an agreement (Contract No.: 5300002395). The contractor has appointed a sub-contractor to be the lorry driver. However, there was no written consent between the main contractor and FGVPMSB sighted. This does not comply with Terma dan <i>Syarat bagi Pesanan Belian</i> (PB)/ <i>Perintah Kerja</i> (PK) [Terms and Conditions for Purchasing/Work Order] 1/2013, Clause 12 – <i>Tugasan dan Perlantikan Sub-kontraktor</i> [Tasks and Appointment of Sub-contractor] and Document Contract, Clause 13 – Assignment of Sub-Contracting.		
Corrections:	 Provide joint agreement documents between FGVPM management and main contractors for the appointment of sub-contractors; 1. Letter of notification of application for appointment of sub-contractor by the main contractor to the regional procurement unit for consideration of permission stating the reason for the need. 2. Letter of decision for permission on the application for appointment of sub-contractors by the main contractor from the FGVPM Procurement unit of the province stating the conditions to be complied with. 3. Procurement department issues a letter of notification to all contractors to comply with the terms in the work contract, among them need to inform and obtain the consent of any sub-contractor appointment. 4. Procurement department provides clear information to projects related to contractor requirements to comply with the terms of the Terms and Conditions for Purchase / Work Order] 1/2013, Clause 12 - Assignment and Appointment of Sub-contractors [Duties and Appointment of Sub-contractors] and Contract 		
Root Cause Analysis:	SOPs are not implemented consistently by project management as there is no enforcement monitoring mechanism and corrective action is implemented immediately to ensure SOPs are complied with by the responsible staff.		
Corrective Actions:	1. There is a SOP enforcement monitoring mechanism for estate management from the regional procurement department officers who are implemented regularly through internal audits and project visits.		

	2. Officers in charge at the estate management level and contractors are given continuous SOP information and training to enhance good understanding.
Assessment Conclusion:	The correction and corrective action were accepted. The evidence of effective implementation of the corrective action shall be verified in the next assessment visit.

Non-conformity			
NCR Ref #	1992765-202010-N3	Clause & Categor (Critical / Minor)	y 3.3.2 (Minor)
Date Issued	03/12/2020	Due Date	Next assessment visit
Closed (Yes / No)	No	Date of nonconfo Closure	rmity Open
Statement of Nonconformity:	The mechanism to cl satisfactorily demonstra		entation of procedure was not
Requirement Reference:	A mechanism to check	consistent implementatior	n of procedures is in place.
Objective Evidence:	 The following lapses were found at Keratong 11 Estate: 1) As per the <i>Penyerahan & Penyimpanan Passport TKA semasa dalam</i> <i>Perkhidmatan</i> [Submission & Retention of Foreign Labour Passport while Inservice] (Doc. No.: FGV/FGVPM-JTK/OP/021, Rev. 0 dated 01/09/2019, Clause 6.5.6, the person responsible has to conduct inspection on the passport that kept in the locker provided by the company on monthly basis and record of inspection must be documented. However, there was no record of inspection was carried out. 2) Reviewed of the pay slips and <i>Kad Kerja</i> (Workday Card), it was found that the workers did not receive RM1,200 as per company's guidance (Ref. No.: (01) HREO/WW/01/1/2020) dated 05/03/2020 issued by Human Resource Department (Plantations) in FGV Holdings. 		
	Month	Employee No.	Wages
		FW04830553	RM1,169.92
	August 2020	FW04830551	RM1,165.80
		FW04830555	RM1,169.86
		FW04830553	RM1,188.44
	September 2020	FW04830468	RM1,190.94
		FW04830513	RM1,196.48
		FW04830555	RM1,186.54
	October 2020	FW04830468	RM1,190.94
		FW04830553	RM1,185.74

	 3) Based on the "<i>Rekod Pengurusan Alat Perlindungan Dirl</i>" (Records of PPE Management) [FGV/FGVPM/GP/F (PK-25)/1.4, the following lapses were found: i) No records of PPE issuance for two workers namely Ali Ramesh (FFB loader) and Riki Martin (sprayer) ii) No records of safety shoes being issued to two sprayers namely Iman Miah and Shankar Peddola iii) There was no signature put by any workers in the records despite blank spaces were provided for them
Corrections:	 <u>Issue 1</u> 1. Re-implement the monitoring record of employee passport storage boxes every month by the Foreign Worker Affairs Officer (HEP). 2. Estate management especially HEP officers are trained and have good knowledge related to SOP management of foreign workers. 3. Regional JTK officers conduct periodic SOP compliance inspections as a enforcement mechanism to estate management. <u>Issue 2</u> 1. Provide a record format for monitoring employees who do not reach the
	 minimum wage every month reviewed by estate management and action every month. 2. A reminder letter is given to the staff supervising the employment of employees so that monitoring of employee employment is done every week . 3. Conduct investigations by JTK regional officer for employees who do not achieve the minimum wage whether the problem of low productivity is due to poor monitoring of officers or employees' failure to comply with the prescribed work discipline. 4. Consultation discussions and mutual agreement are implemented to the group
	of employees who do not reach the minimum wage monitored every month of development. 5. Provide regular training related to the minimum wage payment method to all employees as it improves the understanding of salary calculation and productivity methods. <u>Issue 3</u>
	 Complete PPE management records provided by the responsible officer. PPE submission records are provided according to the form format in the SOP. Conduct briefings to employees on the need for new PPE supply and free replacement, ensure that the PPE acceptance record is completed signed by the employee and the PPE provided complies with the established PPE specifications.
Root Cause Analysis:	SOPs are not implemented consistently by project management as there is no enforcement monitoring mechanism and corrective action is implemented immediately to ensure SOPs are complied with by the responsible staff.
Corrective Actions:	Issue 1

Assessment Conclusion:	The correction and corrective action were accepted. The evidence of effective implementation of the corrective action shall be verified in the next assessment visit.
	Issue 3 1. Review of PPE management records by estate management on a monthly basis
	2. Estate management conducts ongoing discussions with foreign workers to improve the discipline and understanding of workers to achieve the set minimum wage.
	<u>Issue 2</u> 1. Estate management monitors the employment of workers on a weekly basis so that immediate corrections can be implemented for workers with low productivity and not achieving a minimum wage.
	2. Officers in charge at the estate management level and contractors are given continuous SOP information and training to enhance good understanding.
	1. There is a SOP enforcement monitoring mechanism for estate management from the regional procurement department and regional Labor Department (JTK) officers who are implemented regularly through internal audits and project visits.

Non-conformity			
NCR Ref #	1992765-202010-N4	Clause & Category (Critical / Minor)	3.4.2 (Minor)
Date Issued	03/12/2020	Due Date	Next assessment visit
Closed (Yes / No)	No	Date of nonconformity Closure	Open
Statement of Nonconformity:	The social management plan has not been comprehensively completed.		
Requirement Reference:	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.		
Objective Evidence:	 Some of the impacts' changes in Keratong 11 Estate were not identified in the management plan: 1) Delaying in the MyEG service provider on payment which caused the FOMEMA result of workers expired. 2) Deduction of water was made since October 2019 for total RM10 after the Regional Control Unit's visit on 07/10/2019. 3) Monitoring of the recruitment fee by the sub-agent in source of country. 		
Corrections:	1. Conduct SIA evaluation for review with the involvement of all stakeholders involved and changes in the impact on stakeholders are assessed .		

	3. Provide the latest SIA procedures that have been approved by management to be implemented.
	4. Provide training on SIA assessment procedures to responsible staff to improve skills to identify the impact of SIA on projects.
	5. Submit a social impact assessment (SIA) report using the latest SIA procedure format.
Root Cause Analysis:	The latest SIA procedures are still in the management approval process where any changes in the impact on stakeholders from the project management decision have been identified in the latest SOP.
	The revision of the existing SIA plan review could not be carried out by the estate management due to lack of skills in conducting a comprehensive social impact assessment and responsible sustainability officers could not enter the project area due to covid 19 (CMCO) infectious disease control directive factor effective from March 2020 among the causes of such effects are not identified in the project.
Corrective Actions:	Responsible officers at the estate level can implement and identify new impact changes to provide a more complete management action mitigation plan.
Assessment Conclusion:	The correction and corrective action were accepted. The evidence of effective implementation of the corrective action shall be verified in the next assessment visit.

Non-conformity			
NCR Ref #	1992765-202010-N5	Clause & Category (Critical / Minor)	7.3.3 (Minor)
Date Issued	03/12/2020	Due Date	Next assessment visit
Closed (Yes / No)	No	Date of nonconformity Closure	Open
Statement of Nonconformity:	The management for scheduled wastes and non-scheduled wastes was not implemented and effectively monitored.		
Requirement Reference:	The unit of certification does not use open fire for waste disposal.		
Objective Evidence:	During the site visit to the staff housing complex at Block H and Class F14, the auditors found the followings lapses: 1) Disposal of domestic wastes using fire		
	 Empty lubricant containers, empty chemical container, empty paint container, empty mineral water bottles and spillage of engine oil was seen at the residential area. 		
Corrections:	1. Issue a reminder letter to staff who fail to comply with the level of cleanliness and waste management practices set by management.		
	2. Prepare the schedule of the gotong royong program every month with the involvement of the entire staff housing staff in continuously improving cleanliness.		

Root Cause Analysis:	The management of domestic waste and scheduled waste in staff housing areas is less effective because the waste management is managed by employees and families who do not get information and continuing education for awareness of the need to manage the waste more responsibly. There are employees who deliberately do not comply with the instructions of the POM management for the ban on open burning because no serious and firm action will be taken will be imposed.
Corrective Actions:	 Conduct campaigns and provide education on domestic waste management and scheduled waste by all family members living in staff housing. Install several warning signs of Open Burning Prohibition and Scheduled Waste Disposal in the staff housing area provided.
Assessment Conclusion:	The correction and corrective action were accepted. The evidence of effective implementation of the corrective action shall be verified in the next assessment visit.

Opportunity for Improvements		
OFI #	Description	
1992765-202010-I1	Indicator 3.4.3	
	The existing of " <i>Pengenalpastian Aspek dan Penilaian Impek</i> " (Identification of Environmental Aspect and Evaluation of Impact) for FGVPMSB Keratong 11 Estate is acceptable and well maintained. Nevertheless, it can be improved through regular review of the aspect and impact activities for each station / area.	
1992765-202010-12	Indicator 3.6.1	
	The HIRADC can be further improved by re-evaluating the potential effect/consequence for road accidents and carrying/transporting sharp tools (e.g. harvesting sickle). At the point of assessment, the identified potential effect/consequence was only injury and not fatal.	
1992765-202010-I3	Indicator 6.1.4	
	<i>Borang Pemeriksaan Kesihatan Pekerja Ladang Tempatan</i> (Health Inspection for Local Workers Form) could be improved as there was a criterion for female to inform if she is pregnant prior the employment.	
1992765-202010-I4	Indicator 6.2.4	
	The line site inspection in Keratong 3 POM could be further improved to ensure the actual issue is recorded in the checklist.	
1992765-202010-15	Indicator 6.7.1	
	The method of maintaining the minutes of meeting of the OSH committee at Keratong3 POM can be further improved by ensuring the past 7 years minutes are still in place.	

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Positive Findings	
PF #	Description
PF 1	Good cooperation from the management team in the assessment activity.
PF 2	Retrieval of relevant documents was efficient.
PF 3	Employees have a good understanding the intention of sustainability standard.

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1860788-201911-M1	Clause & Category (Major / Minor)	Indicator 2.1.1 Major
Date Issued	04/12/2020	Due Date	04/03/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	28/02/2020
Statement of Nonconformity:	The evidence of compliance with some legal [ref.: Jadual Pematuhan (License No.: 004369, validity 1/7/2019-30/6/2020)] was not adequately demonstrated such as: <u>Condition No. 26:</u> Any leachate generated from the EFB collection centre must be channelled to the effluent treatment system <u>Condition No. 27:</u> Open burning activity of EFB or any mill wastes is not allowed.		
Requirement Reference:	The unit of certification complies with applicable legal requirements.		
Objective Evidence:	 The EFB leachate from the stockyard located in Keratong 3 Estate area nearby the mill was not channeled to the effluent treatment plant as required in item 26 of the Jadual Pematuhan (Compliance Schedule) During the site visit, fire breakout was presence at many patches in the EFB stock piles which is not in line with item 27 of the Compliance Schedule 		
Corrections:	 Build a reservoir to collect leachate flow and pump the leachate water back into the effluent pool. Prepare an emergency response plan for fire at the EFB collection site 		
Root Cause Analysis:	 There is no effective EFB management plan in the palm mill to deal with leachate issues at the EFB collection site. There is no emergency action plan to address the EFB fire issue at the EFB collection site. 		
Corrective Actions:	 For long term plan, the by-products (EFB) will be shredded and sold to the fiber shredder contractor in order reduce the quantity of EFB stock in mill. Establish a fire prevention emergency response team at the mill to monitor the level of security at the existing EFB collection site. 		

Assessment Conclusion:	<u>Major NC onsite verification:</u> As per site verification, the EFB dumping area already establish drainage system direct into effluent pond dated 28 Feb 2020. Management also already appoint person for firefighting as per letter (01)4028/Ktg3/840A dated 1 Jan 2020. Training also have been given to ERP team verified as per record 3 Jan 2020. Management also already approach another solution for EFB such as shredded and sold to other party, this evidence verified as per latest buyer record dated 28 Feb 2020 by Classic Palm oil Mill Sdn Bhd, thus Major NCR was close accordingly.
ASA0_2 Verification	During site visit to POM, the management able to demostrate to auditor, the EFB leachate is managing according to "Jadual Pematuhan". POM has established Emergency Rescue Plan (ERP) to combat with emergency occur in the POM. Thus, the NCR remains closed.

Non-conformity			
NCR Ref #	1860788-201911-M2	Clause & Category (Major / Minor)	Indicator 2.3.1 Major
Date Issued	04/12/2020	Due Date	04/03/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	28/02/2020
Statement of Nonconformity:	The required information from the mill's direct sourced FFB has yet to be obtained.		
Requirement Reference:	 For all directly sourced FFB, the mill requires: Information on geo-location of FFB origins Evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder One or more supporting documents for claims Valid MPOB license 		
Objective Evidence:	 The required information from smallholders through Felda and Felda Technoplant has yet to be obtained by Keratong POM, i.e.: Information on geo-location of FFB origins Evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder One or more supporting documents for claims Valid MPOB license 		
Corrections:	To complete the information of smallholders submitting FFB directly to mill including: - name of supplier, name / estate owner, management telephone number, MPOB license, estate / farm area, coordinates, grant number (for external suppliers) / shared farm lot map lot list by lot (for FELDA and FTPSB) and MPOB license expiration date		

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Root Cause Analysis:	The mill is still in progress for completing information on external suppliers including smallholders from the FELDA and FTPSB which sent the FFB to Keratong 3 POM	
Corrective Actions:	Weighbridge clerk will first check the details of the new FFB supplier such as; geo- location, grant / land ownership information, MPOB license and other supporting documents to be completed before registering the new supplier in mill weighing system.	
Assessment Conclusion:	<u>Major NC onsite verification:</u> Top management (Head of FFB Purchasing Department) has established the plan to ensure all mills must collect data regarding to MPOB license, estate / farm area, coordinates, grant number (for external suppliers) / shared farm lot map lot list by lot (for FELDA and FTPSB) and MPOB license expiration date as per evidence. Latest letter as been issued to all mill (01)FGVTSB/FFBPD/HQ/TRACE dated 8 Jan 2020. Management has taken action and in progress to complete the data, as per sampling the data already available on site. The corrective actions found to be adequate to close the NCR. Nonetheless, the continuous effective implementation shall be carried out in the next assessment.	
ASA0_2 Verification	 POM Management managed to obtain the information from the direct source FFB as such : Source of FFB Address of plantation/dealer MPOB license and Validity Coordinate and size of plantation Ownership status Total crop estimation a year dispatch to POM All this information will be reviewed from time to time and update if there is any change in the information or if there is any new direct source FFB to POM. Thus, the NCR remains closed. 	

Non-conformity			
NCR Ref #	1860788-201911-M3	Indicator 4.1.1	
	1000700 201911 115	(Major / Minor) Major	Major
Date Issued	04/12/2020	Due Date	04/03/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	28/02/2020
Statement of Nonconformity:	The stakeholder minute of meeting is not available.		
Requirement Reference:	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, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.		

Objective Evidence:	Policies were communicated to all Keratong POM & Keratong 11 Estate stakeholder's on 17/10/2019. The stakeholder includes contractors, school representatives, neighbor villagers, etc. However, the minute meeting on stakeholder meeting conducted is not available. Hence, a critical non-conformity is raised.	
Corrections:	Obtain stakeholder consultation minutes of meetings that have been approved and submitted to the project.	
Root Cause Analysis:	The stakeholder consultation program was conducted but the minutes of the meeting were still in the process of approval from the higher authorities.	
Corrective Actions:	The FGVH Department of Sustainability will check the minutes of the stakeholder consultation meeting at the project by including it into internal audit checklist which will be conducted annually	
Assessment Conclusion:	<u>Major NC onsite verification:</u> Stakeholder meeting was conducted on 17 Oct 2019. The record was retrieved and available during on site verification. The Internal audit checklist was updated and included the element on minute of stakeholder. Thus Major NC was close accordingly.	
ASA0_2 Verification	Briefing of the policy was conducted on 17/10/2019 to all the external stakeholders such as FFB suppliers, local communities and government authorities. Besides, briefing to the workers was conducted on 01/09/2020 in Keratong 3 POM and 14/02/2020 in Keratong 11 Estate. All the records of briefing were available.	

Non-conformity			
NCR Ref #	1860788-201911-M4	Clause & Category (Major / Minor)	Indicator 3.6.2 Major
Date Issued	04/12/2020	Due Date	04/03/2020
Closed (Yes / No)	Yes Date of nonconformity 28/02/2020		28/02/2020
Statement of Nonconformity:	The effectiveness of the H&S plan to address health and safety risk was not monitored and implemented.		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	 At Keratong 3 POM the effectiveness of the HIRADC was sampled at the workshop where it was sighted that the Mechanical Apprentice was cutting a metal piece using an oxy without using the appropriate PPE (Shield & Gloves) as stated in the HIRADC. The management has failed to ensure that the provided PPE is used by the employees. The HIRADC also does not state the necessity of training to be provided to the employees that handle the equipment's onsite. The HIRADC only states the need for PPE but does not specify the type of PPE that is required for the particular jobs scope 		

Corrections:	 Provide a letter of warning / warning to employees who fail to comply with the application of PPE. Appoint the responsible officer to check the compliance of the PPE application at the mill's premises. Update the HIRADC documentation by include the training element and PPE implementation as part of the risk control measures. Provide PPE matrix to the type of Welding work in the mill. 		
Root Cause Analysis:	 No officer is responsible for regularly reviewing compliance with PPE. The HIRADC documentation provided has not been updated for the current year. The PPE matrix is not included with the HIRADC documentation 		
Corrective Actions:	 Conduct periodic checks on compliance of PPEs by appointed staffs. HIRADC document review is carried out at least once a year by management and verified. Regular reviews of the PPE matrix are conducted. 		
Assessment Conclusion:	<u>Major NC onsite verification:</u> The HIRARC was updated on 22 Jan 2020. The PPE matrix is included in the HIRARC document. The HIRARC was review during OSH periodic meeting and the latest evidence record was on 22 Feb 2020. The workplace inspection was done by the mill staff to ensure the PPE at each workplace is adequate and ensure workers followed the recommendation. Thus major NC was close accordingly.		
ASA0_2 Verification	Based on site verification at welding operation at the mill, it was found that the operator was able to demonstrate the use of appropriate PPE. Checking on the usage of appropriate PPE at all the operation was also satisfactorily carried out by the appointed officer and recorded in the workplace inspection report. The HIRARC was also reviewed from time to time. There was no recurrence of non-conformity and thus the NCR remains closed.		

Non-conformity			
NCR Ref #	# 1860788-201911-M5		Indicator 7.5.1 Major
Date Issued	04/12/2020	04/03/2020	
Closed (Yes / No)	Yes Date of nonconformity Closure 24		28/02/2020
Statement of Nonconformity:	Keratong 11 Estate does not have a suitable terrain map.		
Requirement Reference:	Maps identifying marginal and fragile soils, including steep terrain, are available.		
Objective Evidence:	Keratong 11 Estate has a terrain map. However, the map does not show the steepness of the terrain in the estate.		
Corrections:	To obtain slope map from the headquarters.		

Root Cause Analysis:	The estate did not get the latest slope map from the headquarters and miss place during audit because no person incharge to control the document.		
Corrective Actions:	Slope maps are displayed for public reference. To appoint person to update the document as per RSPO requirement.		
Assessment Conclusion:	Major NC onsite verification: The slope map establish by Unit Komputer (GPS/GIS) from FELDA Agricultural Services Sdn Bhd was available and management has appointed person incharge as per letter (20)483/10-01-02. Thus Major NC was close accordingly.		
ASA0_2 Verification	The slope map was made available for verification at the estate's office. It was well maintained by the person in-charge. Thus, the NCR remains closed.		

Non-conformity			
NCR Ref #	1860788-201911-N1	Clause & Category (Major / Minor)	Indicator 2.2.3 Minor
Date Issued	04/12/2020	Due Date	03/12/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	03/12/2020
Statement of Nonconformity:	Clauses disallowing child, for agreement.	rced and trafficked labour	were not included in contract
Requirement Reference:	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.		
Objective Evidence:	 Based on the followings sampled contractors, it was found that clauses disallowing child, forced and trafficked labour were not included in contract agreement: Keratong POM: Syarikat Perniagaan Haji Yusof Mohd Isha bin Hassan Sebertak Auto Trading Keratong 11 Estate: Perniagaan Maju Bera MFM Afdhal Ent 		
Corrections:	Obtain new contractual agreement terms with statement of prohibition on use of child labor, forced labor and human trafficking from regional procurement of FGVPM and FGVPISB.		
Root Cause Analysis:	The terms of the contract agreement provided still apply the terms of the old agreement.		
Corrective Actions:	The estate and mill management should check the terms of the contract agreement at each renewal and extension of the contract before the contract is signed.		
Assessment Conclusion:	Corrective action plan accepted. Evidence of its effectiveness to be verified in next assessment.		

the next assessment.	ASA0_2 Verification	The contractors have signed on the Supplier Code of Conduct (SCOC) where the clauses as below was sighted: 1) Clause 3.1 - Compliance with Labour Laws ad Prohibition of Forced Labour 2) Clause 3.2 - Prohibition of Child Labour Sampled the SCOC for contractors as below: Tinta Bumi Enterprise Sebertak Auto Trading MFM Afdhal Enterprise Mohamad Usha bin Hassan Perniagaan Maju Bera Perniagaan Maju Bera Based on the corrective action evidence, the minor NCR is successfully closed. Continuous effective implementation of the corrective action shall be verified in the payt assessment
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Opport	Opportunity for Improvement			
OFI#	Description			
OFI 1	1860788-201911-I1			
	Indicator 2.3.2			
	Details: The effort to obtained information from the indirect FFB sources can be further enhanced by establishing an implementation plan.			
	ASA0 2 Verification: POM Management managed to obtain the information from the direct source FFB as such : 1. Source of FFB 2. Address of plantation/dealer 3. MPOB license and Validity 4. Coordinate and size of plantation 5. Ownership status 6. Total crop estimation a year dispatch to POM			
	All this information will be reviewed from time to time and update if there is any change in the information or if there is any new direct source FFB to POM			
OFI 2	1860788-201911-I2			
	Indicator 5.1.2			
	<u>Details:</u>			
	Based on interview, the effectiveness of explanation about FFB pricing to the smallholders can be further improved especially with regards to deduction of OER award and the derivation of <i>kadar perahan digred</i> (kpg) (extraction grade rate) between category "A" and "B".			
	ASA0 2 Verification:			



	 Sighted the minute meeting for "Jawatankuasa Permaufakatan, Productivity dan Kualiti (JPPK)" which was conducted on 8th November 2020 with a total of attendance of 15 participants representing FGVPISB Keratong 3 POM, FGVPMSB Estates, Felda Technoplant and FFB Dealers. The venue of the meeting is at the FGVPMSB Keratong 4 estate and the agenda of the meeting as follows : 1) Discussion about FFB Quality 2) Performance of FFB Production and OER achievement 3) FFB Price briefing 4) Issue at POM such as Mill breakdown 5) Q & A
OFI 3	1860788-201911-I3
	Indicator 6.7.1
	<u>Details:</u>
	The management can further improve the Meetings of Safety & Health by discussing newly raised issues (<i>isu-isu berbangkit</i>) as it is not mentioned in the Minutes of meeting.
	ASA0_2 Verification:
	Based on verification of OSH committee minutes of meeting, the "newly raised issues" was recorded under Agenda (viii) – <i>Hal-hal berbangkit</i> (Any other matters) for the mill and Agenda (xvi) – <i>Hal-hal lain KKP</i> (Any other matters) for the estate.

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1627502-201804-M1	Major	6.1.3	24/05/2018	Closed out on 19/09/2018
1627502-201804-M2	Major	2.1.1	24/05/2018	Closed out on 19/09/2018
1627502-201804-M3	Major	4.6.11	24/05/2018	Closed out on 19/09/2018
1627502-201804-M4	Major	4.7.1	24/05/2018	Closed out on 19/09/2018
1627502-201804-N1	Minor	6.2.3	24/05/2018	Closed out on 05/12/2019
1627502-201804-N2	Minor	6.6.2	24/05/2018	Closed out on 05/12/2019
1627502-201804-N3	Minor	6.10.3	24/05/2018	Closed out on 05/12/2019
1627502-201804-N4	Minor	4.5.2	24/05/2018	Closed out on 05/12/2019
1627502-201804-N5	Minor	5.1.2	24/05/2018	Closed out on 05/12/2019
1627502-201804-N6	Minor	5.1.3	24/05/2018	Closed out on 05/12/2019
1627502-201804-N7	Minor	5.3.3	24/05/2018	Closed out on 05/12/2019
1627502-201804-N8	Minor	2.1.4	24/05/2018	Closed out on 05/12/2019
1627502-201804-N9	Minor	4.7.5	24/05/2018	Closed out on 05/12/2019
RSPO P&C MYNI 2019	·	•		·
1860788-201911-M1	Critical	2.1.1	05/12/2019	Closed out on 28/02/2020

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1860788-201911-M2	Critical	2.3.1	05/12/2019	Closed out on 28/02/2020
1860788-201911-M3	Critical	4.1.1	05/12/2019	Closed out on 28/02/2020
1860788-201911-M4	Critical	3.6.2	05/12/2019	Closed out on 28/02/2020
1860788-201911-M5	Critical	7.5.1	05/12/2019	Closed out on 28/02/2020
1860788-201911-N1	Minor	2.2.2	05/12/2019	Closed out on 03/12/2020
1992765-202010-M1	Critical	3.6.1	03/12/2020	Closed out on 22/02/2021
1992765-202010-M1	Critical	3.8.6	03/12/2020	Closed out on 22/02/2021
1992765-202010-N1	Minor	2.1.2	03/12/2020	Open
1992765-202010-N2	Minor	2.2.2	03/12/2020	Open
1992765-202010-N3	Minor	3.3.2	03/12/2020	Open
1992765-202010-N4	Minor	3.4.2	03/12/2020	Open
1992765-202010-N5	Minor	7.3.3	03/12/2020	Open

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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 FGV Palm Industries Sdn Bhd – Keratong 3 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	
Internal Stakeholders	Union/Contractors/Communities
Foreign and local workers	Smallholders and settlers
Gender committee representatives	Neighbouring estates
	School representatives
	Contractors
Government Departments	NGO
Nil	Nil

Stakeho	Iders comment
1	Feedbacks: Smallholder & Settler – He has good relationship with the management where the management has actively
	invited them to participate/ attend any celebration organized by Keratong 11 Estate. He also has sought advice from the management related on the operational process such as chemical usage. He understands the procedure of complaint and grievance. No land dispute reported as the boundaries were cleared.
	Management Responses:
	The management will ensure good relationship is maintain with the smallholders.
	Audit Team Findings:
	No further issue.
2	Feedbacks:
	Neighbouring Estate (Ladang DSK) – He informed that there is no land disputed reported as the boundary was demarcated. They are using the same road access with Keratong 11 Estate and they shared the cost of maintaining the road. He has been invited to attend the stakeholder meeting organized by FGV and understand the process of complaint and grievances.

	Management Responses:			
	The management will ensure good relationship with the neighbour plantation.			
	Audit Team Findings:			
	No other issue.			
3	Feedbacks:			
	Schools' Representatives – They have attended stakeholder meetings organized by the company and briefed on the company's policies and procedures such as complaint and grievances. Attendance of the students were satisfactory, and they did not receive any report on the children working in the plantations. Management of the mill and estate has actively supported the school's events.			
	Management Responses:			
	The management will continually provide assistant and support whenever they request.			
	Audit Team Findings: No other issue.			
4	Feedbacks:			
	Workers (different nationalities) – They informed that they were paid according to the Minimum Wage Order 2020. Overtime was voluntarily basis and they were treated equally. Housing was provided, and subsidized water and electricity was given by the company. However, some of the workers informed that they have paid 70,000 India Rupee to the agent for visa, medical and transportation cost from airport in home country to Malaysia.			
	Management Responses:			
	Refer to Indicator 6.6.2.			
	Audit Team Findings:			
	Refer to Indicator 6.6.2.			
5	Feedbacks:			
	Gender Committee Representatives – They informed that no case of sexual harassment and violence report. WhatsApp group chat for the mill's female workers was established to act as a channel if there are any issues reported by the female workers. Besides, the management has consulted the needs of new mother and fulfilled the needs accordingly.			
	Management Responses:			
	The management will continue to monitor if there is any case of sexual harassment and violence reported.			
	Audit Team Findings:			
	No other issue.			
6	Feedbacks:			
	Contractor – The contractor informed that the payment was made promptly. There was no issue to work with FGV. Company's policies and procedures was briefed to him and his workers.			
	Management Responses:			
	The management will continue to monitor to ensure the payment is make according to the payment term.			
	Audit Team Findings: No other issue.			



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	
NA						
Note: The land is legally owned by the Federal Land Development Authority (FELDA) and being leased to FGV. There is no previous land owner.						
Previous land owner / user comment – Not applicable						

Previou	Previous land owner / user comment – Not applicable		
	Feedbacks:		
Management Responses:			
	Audit Team Findings:		

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 FGV Palm Industries Sdn Bhd – Keratong 3 Palm Oil Mill has complied with the RSPO Principles and Criteria Malaysia National Interpretation 2019 for Sustainable Palm Oil 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 FGV Palm Industries Sdn Bhd – Keratong 3 Palm Oil Mill is continued.

Report prepared by	Acceptance of Assessment Conclusion
Name:	Name:
Valence Shem	Ahmad Shahrir Bin Ismail
Company Name:	Company Name:
BSI Services Malaysia Sdn Bhd	FGV Holdings Berhad
Title:	Title:
Lead Auditor	Senior Manager
Signature:	Signature: (I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)
Date: 26/02/2021	Date: 03.03.2021



Appendix A: Summary of Findings

Criterio	on / Indicator	Assessment Findings	Compliance		
Princip	Principle 1: Behave ethically and transparently				
	on 1.1 : The unit of certification provides adequate informatio iate languages and forms to allow for effective participation in	n to relevant stakeholders on environmental, social and legal issues relevant to F decision making.	RSPO Criteria, in		
1.1.1	 (C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance - 	Under the procedure known as Engagement, Consultation and Communication, Document No. FGV/ML-1A/L2-Pr12 effective on 1st June 2016, has specified the publicly available documents.	Complied		
		Documents publicly available also mentioned as per Memo issued by the respective operating units dated 01 st November 2018 (FGVPISB Keratong 3 Palm Oil Mill) and 13 th January 2020 (FGVPMSB Keratong 11 Estate) about "Penyediaan Rujukan Dokumen Umum Di Pejabat" signed by the Palm Oil Mill Manager and Estate Manager. The memo was addressed to internal and external stakeholders surrounding estates and Palm Oil Mill. Documents that are publicly available as listed in the memo as follows;			
		 Company policies including Human rights and etc Safety and Health Plan Environment and Social Management Plan. Social Impact Assessment Management Plan Pollution Prevention Management Plan Record of complaints and grievances. Complaint and grievances procedure Negotiation procedures FPIC Procedure HCV report. Continuous improvement plans 			

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Criterio	n / Indicator	Assessment Findings	Compliance
		 External summary audit report – RSPO / MSPO Program to mitigate negative SIA impact Program to improve smallholder livelihood Etc. 	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Communication was sighted mostly in Bahasa Malaysia and English. This is specified in FGV/ML-1A/L2-Pr12 issue #1 date 1 st June 2016 title 'Engagement, Consultation and Communication. There is evidence that the FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 Estate provide adequate information on social and/or legal issues to relevant stakeholders in the appropriate language (Bahasa Melayu and English).	Complied
		Sighted the evidence of communication used by the FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 Estate using appropriate languages as the medium of communication with internal and external stakeholder as sample follows;	
		i. A memo issued by the respective operating units dated 01 st November 2018 (FGVPISB Keratong 3 Palm Oil Mill) and 13 th January 2020 (FGVPMSB Keratong 11 Estate) concerning "Penyediaan Rujukan Dokumen Umum Di Pejabat". The memo was addressed to internal and external stakeholders surrounding FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 Estate.	
		ii. The company's policies and procedures have been explained to relevant stakeholders on a few occasions during the briefing to the Internal and External stakeholder meeting which was conducted on 10 th January 2020 and 12 th March 2020 for FGVPISB Keratong 3 Palm Oil Mill and 14 th	

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Criterion / Indicator		Assessment Findings	Compliance
		 February 2020 for FGVPMSB Keratong 11 Estate. Among the policies and procedures explained during this meeting such as: Group sustainability policy (Human rights, No open burning, Child Labour, Women rights). Procedure (complaint & grievance) Communication procedure Etc. 	
1.1.3	 (C) Records of requests for information and responses are maintained. - Critical (Major) compliance - 	Keratong 3 POM and Keratong 11 Estate has implemented <i>Rekod Permohanan</i> <i>dan Maklumbalas</i> to record any requests from stakeholders. The general requests were from the authorities such as MPOB, Department of Health and Department of Statistic. The management has responded to all the requests accordingly.	Complied
1.1.4	 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. Critical (Major) compliance - 	FGV has established SOP for information request from relevant stakeholders and documented in <i>Komunikasi, Penglibatan dan Rundingan</i> ' with Doc. No.: FGV/ML-1A/L2-Pr12 dated 01/06/2016. The objective of the SOP is to establish an effective system for communication between company and stakeholder. The stakeholders (suppliers and settlers) have been briefed on the procedure during meeting on 18/11/2020 and the workers were briefed on 19/09/2020. Records of meeting minutes and attendance list were sighted. Assistant Admin Executive of Keratong 3 POM has been appointed as Communication and Social Officer and appointment letter dated 02/01/2020 was available.	Complied
		Assistant Manager of Keratong 11 Estate has been appointed as Communication and Social Officer and appointment letter dated 10/01/2020 was sighted.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.	Keratong 3 POM (last reviewed on 01/10/2020) and Keratong 11 Estate (last reviewed on 15/09/2020) has developed Internal and External Stakeholder List.	Complied

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n / Indicator	Assessment Findings	Compliance
- Minor compliance -	Details of the stakeholders such as address, contact person and contact numbers are available in the stakeholder list. Stakeholders comprise of government authorities, suppliers, contractors, NGOs, local communities, schools and external FFB suppliers.	
1.2: The unit of certification commits to ethical conduct in a	Il business operations and transactions.	
A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	FGV Group Sustainability Policy (GSP) (Policy No.: FGV/SED/POL/001 dated 29/5/2019) in English and Bahasa Malaysia. The policy has detailing the responsibility and compliance to the policy and FGV's commitment to sustainability. Besides, Code of Business Conduct and Ethics (CoBCE) for Employees (Policy No.: FGV/GHR/POL/039, Rev. 4 dated 01/01/2020) was established which incorporated various aspect of committing to a code of ethical conduct and integrity. Supplier Code of Conduct was available in the company's website (Doc. Version: 01/05/2020) which outlined the business ethics& integrity for all the suppliers with FGV Holdings Berhad. The policies are accessible by the stakeholders via www.fgvholdings.com/sustainability/. Besides, the GSP was publicly displayed at the notice board of Keratong 3 POM. Briefing of the CoBCE was conducted on 01/08/2020 in Keratong 3 POM and 14/02/2020 in Keratong 11 Estate and seen the record of attendance of the briefing.	Complied
A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	 Implementation and monitoring of the compliance of the policy was conducted through agreement and the Supplier Code of Conduct (SCOC). Sampled the SCOC for contractors as below: 1. Tinta Bumi Enterprise 2. Sebertak Auto Trading 3. MFM Afdhal Enterprise 4. Mohamad Usha bin Hassan 	Complied
	 Minor compliance - 1.2: The unit of certification commits to ethical conduct in a A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. Minor compliance - 	- Minor compliance - Details of the stakeholders such as address, contact person and contact numbers are available in the stakeholder list. Stakeholders comprise of government authorities, suppliers, contractors, NGOs, local communities, schools and external FFB suppliers. • 1.2: The unit of certification commits to ethical conduct in all business operations and transactions. FGV Group Sustainability Policy (GSP) (Policy No.: FGV/SED/POL/001 dated 29/5/2019) in English and Bahasa Malaysia. The policy has detailing the responsibility and compliance to the policy and FGV's commitment to sustainability. Besides, Code of Business Conduct and Ethics (CoBCE) for Employees (Policy No.: FGV/GHR/POL/039, Rev. 4 dated 01/01/2020) was established which incorporated various aspect of committing to a code of ethical conduct and integrity. Supplier Code of Conduct was available in the company's website (Doc. Version: 01/05/2020) which outlined the business ethics& integrity for all the suppliers with FGV Holdings Berhad. The policies are accessible by the stakeholders via www.fgvholdings.com/sustainability. Besides, the GSP was publicly displayed at the notice board of Keratong 3 POM. Briefing of the coBCE was conducted on 01/08/2020 in Keratong 3 POM and 14/02/2020 in Keratong 11 Estate and seen the record of attendance of the policy was conducted through agreement and the Supplier Code of Conduct (SCOC). Sampled the SCOC for contractors as below: • Minor compliance - 1. Tinta Bumi Enterprise

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Criteri	on / Indicator			Assessment Findings	Compliance
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.					
2.1.1	(C) The Unit of Certification requirements - Critical (Major) compliance -	o complies w	ith legal	 FGVPISB Keratong 3 POM continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. FGVPISB Keratong 3 POM has obtained and renewed license and permits as required by the law. Sample of license checked at FGVPISB Keratong 3 POM and FGVPM Keratong 11 Estate are as follows: i) Certificate of fitness for sterilizer 2100mm OD x 27480mm SL, PMT-PH/20/31351, valid until 24/5/2021 ii) Certificate of fitness for sterilizer 2100mm OD x 27480mm SL, PMT-PH/20/31352, valid until 24/5/2021 iii) Certificate of fitness for sterilizer 2100mm OD x 27480mm SL, PMT-PH/20/31352, valid until 24/5/2021 iii) Certificate of fitness for overhead travelling crane, PMA-PH/20 31342, valid until 24/5/2021 iv) Certificate of fitness for steam receiver, PMT-PH/20 31349, valid until 24/5/2021 v) Certificate of fitness for boiler, PMD-PH/20 31388, valid until 24/5/2021 vi) DOE license no.: 618371015000 valid until 30/06/2021 vii) DOE license No. 005103, validity period 1/07/2020 -30/6/2021, method of discharge: water ways viii) Temporary Declaration Slip for Authorised Entrant and Standby Person – Refresher (AESP-R), exam code 09-01/04/AESPRE/ALAF/2020/03, expires on 2/12/2020 ix) Authorised Gas Tester, #HQ/19/AGTES/01/03160, validity 8/1/2019 to 3/1/2022 – the competent person has been transferred to other FGV's mill and Keratong 3 has a plan to groom a new competent person x) MPOB License #500194604000, valid until 31/3/2021 	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
		 xi) Keratong 3 POM is in the process of application for exceed overtime limit of 104 hours which received by Labour Office, Pekan, Pahang on 21/10/2020. Currently, the application is under review by Jabatan Tenaga Kerja Negeri Pahang. Correspondence of the application and reviewing process is sighted. Besides, FGV Holdings Berhad has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia for deduction of wages not more than 50% monthly from the workers. Approval letter with Ref. No.: (6) BHG PU/9/129 dated 10/04/2012 was sighed. Seen the consent letter signed by the workers on the deduction of wages. 	
	FC	FGVPM Keratong 11	
		i) Permit to store diesel, #C000676, validity 2/7/2020 to 1/7/2021	
		ii) MPOB License, #558962002000, validity 27/10/2020 to 28/2/2021, 1,178.31 Ha	
		 iii) FGV Plantations (Malaysia) Sdn Bhd has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia to make deduction of wages after deducting of the subsidize from the management as below: 	
		Water bill/ month (subsidized RM 4)	
		Electricity bill/ month (subsidized RM 6)	
		Medical fee/ year (subsidized RM 200)	
		The approval letter with Ref. No.: (22) dlm BHG. PU/9/129 Jld 23 dated 26/04/2016 was sighted.	
2.1.2	A documented system for ensuring legal compliance is in	FGVPISB Keratong 3 POM	Non-
	place. This system has a means to track changes to the laws and regulations.Minor compliance -	List of applicable legal and other requirements was made available in "Register of Legal and other Requirements" [doc. No.: FGV/FGVPISB/IV/IMS/15/2.1] which was last updated on 1/11/2020. Among the information in the register was the relevant requirements excerpts from laws, responsible personnel and	compliance

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Criterio	n / Indicator	Assessment Findings	Compliance		
		compliance status. The compliance status was updated regularly through an evaluation exercise. With regards to tracking changes to the laws and regulations, the mill is guided by Legal and Other Requirements procedure [doc. No.: FPI/L2/QOSHE-2.0, rev. 3, dated 29/11/2016]. Based on the procedure, generally the tracking of changes is under the responsibility of HQ level. Based on the feedback from Sustainability In charge, the POM Management has the intention to apply for the " <i>Lesen Pelanggaran</i> " (Contravene License) with regards to non-compliance with the location of the EFB storage. However, there is no application has been made to the Department of Environment thus far.			
		<u>FGVPM Keratong 11 Estate</u> At Keratong 11 Estate a summary of compliance FY2020 incorporating all the legal requirements are sighted during onsite. Latest requirements such as <i>Akta</i> <i>Pencegahan dan Pengawalan Penyakit Berjangkit 1988</i> , was registered in the list.			
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	FGVPISB Keratong 3 POM is using wire mesh fencing to demarcate its legal boundaries and the fencing was visibly maintained. At FGVPM Keratong 11, physical boundary demarcation such as trenches and red/white 2" PVC pipe poles is being practiced on site. Apart from that, the former electrical fencing was also still in place along the boundary. Observed at Block 13 boundary with Lesung Forest Reserve [2°54'17" N 103°1'15" E] and Block 4 boundary marking Far East Estate [2°54'17" N 103°1'15" E]. The visibility of trenches can be further improved since some places are covered by overgrown vegetation.	Complied		
Criterio	Criterion 2.2: 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.	FGVPISB Keratong 3 Palm Oil Mill & FGVPMSB Keratong 11 Estate	Complied		

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Criterio	on / Indicator	Assessment Findings	Compliance
	- Minor compliance -	A list of contractors is available which consists of various activities such as EFB Transport from Palm Oil Mill to Field, FFB Transport from Estate to Palm Oil Mill, construction works, mechanical works, spare parts supplier, to name a few. The name of the list is "Nama Syarikat (Pembekal & Pemborong) ada Urusniaga dengan Kilang Keratong 3 Tahun 2020 under FGVPISB Keratong 3 Palm Oil Mill and List of Internal and External stakeholder year 2020 under FGVPMSB Keratong 11 Estate. The list is prepared to include information such as supplier names, contact	
		number, email address, contact person and business address.	
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 -	 <u>FGVPISB Keratong 3 Palm Oil Mill</u> Sampled contracts taken for audit verification is namely Tinta Bumi Enterprise and Mr. Mohd Fozi bin Zainun. The scope of works for the contractor as follows; 1. Tinta Bumi Enterprise – To provide manpower, materials, 	Non- compliance
		equipment, transportation and all related requirements to carry out grass cutting and spraying in the housing complex of Keratong Palm Oil Mill 3	
		2. Mr. Mohd Fozi bin Zainun – "Menarik pasir di dalam Daelim Boiler"	
		Sighted evidence of payment issue by FGVPISB Keratong 3 Palm Oil Mill to Tinta Bumi Enterprise through payment voucher amounted RM 2,350.00 dated 20 th October 2020. Palm Oil Mill account has received the tax invoice from the	

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Criterion / Indicator	Assessment Findings	Compliance
	contractor on 3^{rd} October 2020 for Invoice No. : 0806 0805 0807 0804. The agreed term is within 30 days.	
	The contract has been executed by the contractor itself without engaging with any local or foreign labour.	
	FGVPMSB Keratong 11 Estate	
	Sampled contracts taken for audit verification is namely Perniagaan Maju Bera.	
	The scope of works for the contractor as follows; 1. Perniagaan Maju Bera – To provide lorry driver, loaders and all necessary thing to carry out the work of transporting FFB from the fields to the ramp and ramp to the Palm Oil Mill	
	Sighted evidence of payment issue by FGVPMSB Keratong 11 Estate to Perniagaan Maju Bera through payment voucher amounted RM 26,803.14 dated 10^{th} September 2020. The Estate account has received the tax invoice from the contractor on 31^{st} August 2020 for Invoice No. : K11-1104. The agreed term is within 30 days	
	Perniagaan Maju Bera company has legally employed 2 workers to assist them in the operation. The details of workers as follows :	
	No Name Nationality IC / The Passport No validity of IC / Passport	

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Criterio	on / Indicator	Asses	smen	t Findings					Compliance
			1	Mohd Zaki Yamani bin Saleh	Malaysia	xxxxxx – xx - 5403	Valid		
			2	Supratman	Indonesia	AU xxx350	Valid		
		identif	fication	by the auditor fo documents such as ments are valid.					
		Kerato	ong 11	Estate:					
		has si appoir conse with 1 Clause Clause	igned nted su nt betw Ferma e 12 – e 13 –	or appointed by the the agreement (Co ub-contractor to be ween the contracto dan Syarat bagi Pe Tugasan dan Perla Assignment of Sub-	ontract No.: the lorry driv or and FGVPM esanan Belian antikan Sub-k -Contracting.	5300002395). ver. However, tl ISB sighted. Th (PB)/ Perintah ontraktor and	The contract here was no v is has not co Kerja (PK) 1 Document Co	or has written mplied /2013, ntract,	
2.2.3	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. - Minor compliance -	Condu was s	ict and igned Oil Mil	valid contract agree I Purchase Order T by both parties - I and FGVPMSB Ke	erms and Co Contractor ar	nditions (PB) a nd Company (F	nd Work orde GVPISB Kera	er (PK) tong 3	Complied
		- Bu: - Sat - Iab	siness fety, H our sta	Code of Conduct - S Ethics & Integrity ealth and Environm andards (labour law cation & Document	ient is, Child labou		ır)		

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Criterion / Indicator	Assessment Findings	Compliance
	- Sustainability	
	ii. Purchase Order Terms and Conditions (PB) and Work order (PK)	
	- Definition	
	- Issuance and confirmation of PB and/or PK	
	- Delivery and/or execution	
	- Checking upon arrival	
	- Copy right and risk	
	- Acknowledgment	
	- Price and payment	
	 Representations and guarantees Intellectual property rights Indemnity and liabilities Insurance 	
	 Assignment and appointment of sub-contractors Termination of PB and/or PK 	
	 Confidentiality Materials provided Dangerous goods, environmental protection, obligation to declare Compliance with anti-corruption laws, prevention of breach of trust, prevention of money laundering charges and other criminal laws. 	

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Criterio	n / Indicator	Assessment Findings	Compliance
		The FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 Estate has established and spelled the labour standard and, Child labour in their "Supplier Code of Conduct - SCOS" version May 2020. The contractors have been brief about the content and sign the Supplier Code of Conduct - SCOS before the commencement of any works.	
		Interviews with workers and staff confirmed that there are no children employed and used by the contractor in the FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 Estate in their daily operations.	
Criterio	n 2.3: All FFB supplies from outside the unit of certification a	re from legal sources.	
2.3.1	 (C) For all directly sourced FFB, the mill requires: Information on geo-location of FFB origins Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license 	Sighted list of direct sourced FFB supply to FGVPISB Keratong 3 Palm Oil Mill. The Palm Oil Mill management managed to obtain the required information from the directly sourced FFB supplier. The information contains details such as;	Complied
		1. Source of FFB	
		2. Address of plantation/dealer	
		3. MPOB license and Validity	
	- Critical (Major) compliance -	4. Coordinate and size of plantation	
		5. Ownership status	
		6. Total crop estimation a year despatch to Palm Oil Mill	
		List of directly source FFB supplier to the Palm Oil Mill as follows;	
		 Organized Smallholders. Felda Keratong 3 	

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Criterio	on / Indicator	Assessment Findings	Compliance		
		 Felda Technoplant Keratong 3 Felda Keratong 4 Felda Technoplant Keratong 4 Felda Keratong 5 Felda Technoplant Keratong 5 Felda Keratong 7 Felda Keratong 7 Felda Technoplant Keratong 7 Felda Keratong 11 2. Dealers Bakti Mas Sdn. Bhd. Seng Hingland Eng Huat Latex Concentrate Sdn. Bhd. Eratudiza Binti Ghazi 			
2.3.2	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. - Minor compliance -	 There were 4 suppliers identified as a dealer by the certification unit. The dealer namely as follows; Bakti Mas Sdn. Bhd. Seng Hingland Eng Huat Latex Concentrate Sdn. Bhd. Eratudiza Binti Ghazi 	Complied		
Princip	le 3: Optimise productivity, efficiency, positive impacts	and resilience			
Criterio	Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.				
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	FGVPISB Keratong 3 POM has documented an annual business plan in the form of annual budget and the projection for 5 years (until 2025) prepared as guidance for future planning. The business plan contains the information about	Complied		

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Criteri	on / Indicator	Assessment	Findings		Compliance	
	- Critical (Major) compliance -	Estimated Sluc	ge Oil Price.	O Price, Estimated PK Price, Estimated Shell Price,		
		of an annual t future plannin	budget and the	as documented an annual business plan in the form a projection for 3 years prepared as a guidance for ass plan contains Projected Crop, Maintenance & as and Financial Cost.		
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.					
	- Minor compliance -	Year	На			
		2020	0			
		2021	222.17			
		2022	245.03			
		2023	100.26			
		2024	0			
		2025	0			
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -				Complied	
		Based on the minutes of meeting, the following agendas were adequately recorded:				
	Internal Audit Report					
			nmental aspec	t		
		• SIA ad	tion plan			

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Criterion / Indicator	Assessment Findings	Compliance
	 Production Follow up action from previous management review Safety & Health Continual improvement manual Other business FGVPM Keratong 11 Estate's Management Review is done annually and was last conducted on 24/8/2020. It was chaired by the Estate Manager, and attended by 12 key personnel which includes AMs, staffs, office clerks, etc. Based on the minutes of meeting, the following agendas were adequately recorded: Internal Audit Report Customer satisfactory Production Environmental aspect SIA action plan Replanting Changes that could affect the management 	
Criterion 3.2 : The unit of Certification regularly monitors and reviews that allow demonstrable Continuous improvement in key operations.	s their economic, social and environmental performance and develops and implementation of the second s	ents action plans
 3.2.1 (C) 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. Critical (Major) compliance - 	FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 Estate Action plan for continual improvement has been implemented, based on a consideration of the main social and environmental impacts and opportunities	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].	The RSPO metrics template has yet to be finalized nonetheless, other forms of reports are submitted to the RSPO Secretariat last dated 12 th July 2019 titled UPDATES ON FGV HOLDINGS BERHAD'S SUSTAINABILITY INITIATIVES addressing the following issues:	Complied
	PROCEDURAL NOTE:		
	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, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required. - Minor Compliance -	 Grower Operational profile Operations and certification progress Palm Oil and Certified palm oil production Time-bound plan Concession map GHG footprint Support for oil palm smallholders Actions for the next reporting period Challenges Revised Group Sustainability Policy Supplier Code of Conduct Guidelines and Procedures for the Responsible Recruitment for Foreign Workers. Second Quarterly Progress Report to RSPO Petition by Grant & Eisenhower ESG Institute Independent Advisory Panel 	
Criterio	n 3.3: Operating procedures are Appropriately documented, c	onsistently implemented and monitored.	

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Criteri	on / Indicator	Ass	essment Findings				Compliance
3.3.1	 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance - 	PON FPI/ mill	1 were available and n L3/1-01 to FPI/L3/16-	naintained in a file. Th 01] in total which cove	OPs) for FGVPISB Ken here were 141 SOPs [c ered the entire operation tablished on 2/1/2001	doc. No.: on of the	Complied
			the estate, " <i>Manual La</i> Jual) is in place.	<i>dang Sawit Lestari</i> " (O	il Palm Plantation Sust	ainability	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	ope ens	rations annually. There ure compliance again	were other audits by	mist) inspect and repo group internal audit an nd procedure with re- velfare requirements.	d SED to	Non- compliance
		Nonetheless, the following lapses were found at Keratong 11 Estate:					
			Perkhidmatan (Do 01/09/2019, Claus inspection on the company on mont documented. How out in Keratong 11 2. Reviewed of the p that the workers d (Ref. No.: (01)HRI Human Resource I Month	c. No.: FGV/FGVPM-JT e 6.5.6, the person resp passport that kept in the hly basis and record of ever, there was no rec Estate. ay slips and <i>Kad Kerja</i> lid not receive RM 1200 EO/WW/01/1/2020) da Department (Plantation Employee No.	in Keratong 11 Estate 0 as per company's gu 1ted 05/03/2020 issued ns) in FGV Holdings. Wages	ed lict the carried found idance	
			August 2020	FW04830553	RM 1,169.92		
				FW04830551	RM 1,165.80		

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Criteri	on / Indicator	Ass	essment Findings			Compliance
				FW04830555	RM 1,169.86	
			September 2020	FW04830553	RM 1,188.44	
				FW04830468	RM 1,190.94	
				FW04830513	RM 1,196.48	
			October 2020	FW04830555	RM 1,186.54	
				FW04830468	RM 1,190.94	
				FW04830553	RM 1,185.74	
			found: iv) No records of PF loader) and Riki v) No records of sa Miah and Shanka	PE issuance for two w Martin (sprayer) fety shoes being issu ar Peddola	/1.4, the following lapses were workers namely Ali Ramesh (FFB ued to two sprayers namely Iman	
				nature put by any w re provided for them	vorkers in the records despite	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	reco pra visit	ommendations for ir ctices. Mill advisor, C	nprovements are gi Operation Technical (mill and plantation advisors and iven to maintain the sustainable Officer, Regional General Manager plementations of procedures are	complica

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Criterio	n / Indicator	Assessment Findings	Compliance
	n 3.4: A comprehensive Social and Environmental Impact Ass ment and monitoring plan is implemented and regularly update	essment (SEIA) is undertaken prior to new plantings or operations, and a social an ed in ongoing operations.	d environmental
3.4.1	 (C) 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. Critical (Major) compliance - 	There was no new planting reported in Keratong 11 Estate. SIA was conducted on 20/08/2019 for Keratong 3 POM and 21/08/2019 for Keratong 11 Estate by the Sustainability Compliance and Certification Department. The methodology of the assessment was through sampling of stakeholders to be interviewed. Stakeholders were consulted during the stakeholder meeting as well. Positive and negative impacts were identified and incorporated into the Management Plan 2019/ 2020 dated 20/08/2019 and 21/08/2019.	Complied
3.4.2	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. - Minor Compliance -	 Social Management Plan 2019/ 2020 was developed in Keratong 3 POM and last reviewed on 28/11/2020 and 21/09/2020 in Keratong 11 Estate. The impact/ issue raised during stakeholder consultation were recorded in the management plan. For e.g.: Impact: There was no pricing displayed in the canteen. Actions to be taken: Meeting with the canteen. Status: Meeting was conducted on 10/01/2020 and the pricing was displayed accordingly as verified through site visit to the canteen. Impact: The tractor driver of contractor does not have driving license. Actions to be taken: Meeting with the contractor and prepared the respective document accordingly. Status: Driving license of the tractor license was sighted with Class B2, D and E. Meeting with the contractor was conducted on 14/10/2019 and seen the meeting minutes where the issue of driving license was discussed. However, some of the impacts' changes in Keratong 11 Estate were not identified in the management plan: 	Complied

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Criterion / Indicator Assessment Findings Compliance 1. Delaying in the MyEG service provider on payment which caused the FOMEMA result of workers expired. 2. Deduction of water was made since October 2019 for total RM 10 after the Regional Control Unit's visit on 07/10/2019. 3. Monitoring of the recruitment fee by the sub-agent in source of country. (C) The social and environmental management and The management plan and monitoring plan are reviewed on 28/11/2020 and 3.4.3 OFI monitoring plan is implemented, reviewed and updated 21/09/2020 and actions were taken accordingly. The management plan has been regularly in a participatory way. distributed to the settlers and FFB suppliers during the Jawatankuasa Permaufakatan, Proactiviti dan Kualiti (JPPK) meeting on 27/08/2020. All the - Critical (Major) compliance attendees had no comment on the management plan. The existing of "Pengenalpastian Aspek dan Penilaian Impek" (Identification of Environmental Aspect and Evaluation of Impact) for FGVPMSB Keratong 11 Estate is acceptable and well maintained. Nevertheless, it can be improved through regular review of the aspect and impact activities for each station / area. Criterion 3.5: A system for managing human resources is in place. 3.5.1 Employment procedures for recruitment, selection, hiring, FGV has developed Garis Panduan Pengambilan & Perlantikan Pekerja Am G7 Complied promotion, retirement and termination are documented and (Doc No.: 2020/1, Rev. 3 dated 01/05/2020) for the mill of FGV Palm Industries made available to the workers and their representatives Sdn Bhd. The procedure has explained the process of recruitment of General where applicable. workers in the mill. Besides, policy for performance management, termination of employment (dated 04/12/2019) and Compensation Policy (dated 01/01/2020) - Minor Compliance was developed to explain the process of promotion, retirement and termination of employment. In addition, Collective Agreement valid from 01/01/2019 to 31/12/2021 has describe the criteria of promotion, retirement and termination. Jabatan Tenaga Kerja FGV has developed a list of Policy and Procedure with the name Senarai Utama Polisi dan SOP Jabatan Tenaga Kerja (JYK). 'Proses

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Criterio	on / Indicator	Assessment Findings	Compliance
		<i>Socialisasi & Temuduga'</i> with Doc. No.: FGV/FGVPM-JTK/SOP/003 dated 01/09/2019 for recruitment of foreign workers is part of the procedure. Besides, FGV Group has established Guidelines and Procedures for Responsible Recruitment of Foreign Workers dated 27/6/2019 which available in company's website, <u>https://www.fgvholdings.com/wp-content/uploads/2020/02/FGV-Group-Guideline-and-Procedures-For-Responsible-Recruitment-of-Foreign-Workers-Final.pdf</u> . The procedure is to set a guideline and adopt the principles in Group Sustainability Policy including non-discrimination, respect for human rights and labour rights. The procedure has outlined the whole process starting from recruitment, hiring, employment and post-employment.	
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Interviewed with the Assistant Admin Executive in Keratong 3 POM confirmed that they displayed notice of jab vacancy in the notice board outside the office, mosque and community halls nearby the mill to inform the local communities on the job vacancy. Seen the sample of advertisement for General Workers where terms and conditions were clearly stated in the advertisement such as the age must be 18 years old and above and the qualification of education must be minimum completed Form 3. Benefits such as wages and other allowances were stated in the advertisement. The last recruitment in the mill was on October and records of recruitment such as Application for Employment form, copy of identification card, certificates of educations, offer letter and medical report were available.	Complied
		FGV has signed agreement with the approved agents for India and Indonesia and outlined all the terms and conditions in the agreement. In the agreement, the agents agreed not to collect any fees from workers during the recruitment process. The cost of the recruitment process was detailed out in the agreement. Besides, the candidates were briefed on the "Communication Pack" during the pre-employment process. The contents of communication pack are such as working terms and conditions and cost to be borne by the company and employees. Seen the presentation slides that presented to the candidates in	

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Criteri	on / Indicator	Assessment Finding	S		Compliance
			ewed with the workers confir tation slides during the pre-em		
Criteri	on 3.6: An occupational health and safety (H&S) plan is docum	ented, effectively comm	unicated and implemented.		
3.6.1	 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance - FGVPISB Keratong 3 POM had assessed and identified significant hazards and determining control (HIRADC) records, as well as CHRA reports were verified during the assessment. For example, CHRA for FGVPISB Keratong 3 POM was last conducted on 24/6-8/7/2020 by registered assessor [#HQ/08/ASS/00/85, validity 3/4/2019 to 2/4/2022]. CHRA report reference no.: HQ/08/ASS/00/85-2020-0003. Work units were sampled, assessed, and related recommendation report were evaluated. Example of recommendation as per below: 				
		Work Unit	Recommendation	Status	
		WWTP/Boilerman	To supply and use organic vapour mask R95	In the process of ordering	
		Laboratory personnel	To conduct the effectiveness inspection by hygiene technician once every 12 months for the fume hood unit	2020 [ref.:	
		Electrical maintenance personnel	To conduct area monitoring and personal monitoring for iron oxide by competent hygiene technician as a baseline	24/10/2020 – verified through confirmation	

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Criterion / Indicator	Assessment Finding	js		Compliance
			dated 26/10/2020 as final report is still pending	
	Oil store clerk	To conduct training on understanding of CLASS Regulations 2013 (SDS understanding).		
	risks and determine identification, risk asse as CHRA reports wer further improved by accidents and carryine point of assessment, t and not fatal (OFI). CHRA for FGVPM Ker	Estate had assessed and identified appropriate risk control essment and determining contro re verified during the assessm re-evaluating the potential eff g/transporting sharp tools (e.g. the identified potential effect/co	measures. The hazard (HIRADC) records, as well ent. The HIRADC can be ect/consequence for road harvesting sickle). At the nsequence was only injury essed on 13/2/2018 by a	
	11/11/2020 due to n ester, chlorophacinon	JKKP HIE 127/171-(8). The C ew pesticides were in use suc e, cypermethrin, and sodium of and related recommendation indation as per below:	h as triclopyr butoxyethyl chlorate. Work units were	
	Work Unit	Recommendation	Status	
	Pesticide Applicator	Medical Surveillance should be done at least once a year.	Last conducted on 12-13/11/2020	

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Criterio	n / Indicator	Assessment Findin	gs		Compliance
		Fertilizer Applicator	To use N95 mask when applying fine dusty form of fertilizer		
		Kenderaan Ladang"	d that There is no evidence that (Farm Tractors Inspection Form ed by Keratong 11 Estate as) for tractors transporting	
3.6.2	(C) The effectiveness of the H&S plan to address health and	Keratong 3 POM			Complied
	safety risks to people is monitored. - Critical (Major) compliance -	•	as been established which sorted	into 5 components i.e.	
		i) OHS Training	programme (which involve intern	al personnel only)	
		, , ,	programme (which involve third		
		iv) License and certi	ficate of fitness renewal		
			v certificate renewal [e.g. first a sor (AGTES) and Authorised End		
			of the year 2020 plan was foun nick-up due to movement contro		
		Keratong 11 Estate			
		surveillance, PPE tra	has been established which ining, fire breakout training, RS and harvesting) and first aid trai	SPO training, SOP training	
Criterio	n 3.7: All staff, workers, Scheme Smallholders, out-growers, a	ind contract workers a	re appropriately trained.		

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Criterion / Indicator		Assessment F	indings	Compliance
3.7.1	(C) 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 RSPO P&C, in a form they understand, and which includes assessments of training. - Critical (Major) compliance -	training prograi	FGVPISB Keratong 3 POM and Keratong 11 Estate has established an annual training programme for the FY 2020 that covers all aspects including policies, best practices, OSH, environment other trainings related to third party.	
3.7.2 Records of training are maintained.- Minor Compliance -		were verified o	s for employees available and maintained at the office. Records n a sampling basis that covers all aspect of training and RSPC nt. Samples of training record as follows:	Complica
		Date	Training	
		22/1/2020	OHS committee training	
		22/1/2020	Awareness training on OHS and its related legal requirements	
		17/2/2020	Training on chemical handling	
		17/2/2020	Hearing conservation training	
		19/2/2020	OSH campaign training	
		22/1/2020	PPE usage training	
		14/2/2020	Fire drill	
		14/2/2020	First aider training	
		17/8/2020	Training on RSPO & MSPO SCCS	
		24/10/2020	Briefing on <i>Kadar Perahan Gred (KPG)</i> (Grade Extraction Rate) awarded to third party FFB suppliers	
		Keratong 11 Es		
		Date	Training	

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Criterio	on / Indicator	Assessment F	indings	Compliance
		2/10/2020	Management and use of PPE	
		29/9/2020	Briefing on OHS policy	
		21/9/2020	Briefing on scheduled wastes	
		15/9/2020	Training on manuring	
		15/5/2020	Training on chemical spraying	
		5/3/2020	Training od manual weeding and sharpening tools	
		28/2/2020	FFB quality campaign program	
		30/1/2020	Harvesting training	
3.7.3	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. - Minor Compliance -	17/8/2020 to 8	ong 3 POM has last conducted the RSPO SCCS training on personnel which comprises of assistant manager, supervisor, rk, laboratory operator, operation staff and auxiliary police.	Complied
	on 3.8 : Supply chain requirement for mills			
(note: A	Il supply chain requirements are considered as Critical (C) . Ho	wever it will not o	contribute to suspension if there is more than 5 non-compliance v	within a principle)
3.8.1	Identity Preserved Module	Not applicable.		Complied
	A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.			
	Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.			

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Criterio	on / Indicator	Assessment Findings	Compliance
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd 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.	Keratong 3 Palm Oil Mill receives and process both FFB supplied from Keratong 11 Estate (own supply base) and other third parties. Since the last assessment, it did not receive any certified FFB from any third parties. Roughly, the FFB received from its own supply base is less than 5% from the total FFB received.	Complied
3.8.3	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&C certification 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 estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report (see Table 10).	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Registration of transaction is done through the utilisation of RSPO Palmtrace. Verification of the RSPO Palmtrace showed that the mill has met all the registration and reporting requirements.	Complied
3.8.5	 Documented procedures The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	Procedure namely SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, Issue 3, rev. 3 was established which covered general chain of custody, RSPO SCC Committee, Sustainability Compliance & Certification (SCCD), FGVHB, organization chart responsibility, RSPO SCC Supply Chain Verification, claim, RSPO Supply Chain Model, Handling Non-conformance material & document, supply chain verification-FFB delivery plantation to mill, etc. It was stated in the SOP that the Mill Manager is the chairman of RSPO SCC Committee whom need to ensure the RSPO SCC system is being implemented. The job descriptions were identified in the procedure accordingly.	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
	 b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) 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 mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 		
3.8.6	 Internal Audit i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. ii) 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 mill shall maintain the internal audit records and reports. 	Procedure namely SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 was established which covered the internal audit under Sustainability & Environmental Department (SED), FGVH responsibility. The internal audit will be plan annually before CB audit. The internal audit procedure is cross-referred to SOP: FGV/ML-1A-L2-Pr11 issue 1 dated 01.06.2016. The internal audit for RSPO SCCS for Keratong 3 POM was conducted on 17-18/8/2020 by FGV's Sustainability & Environmental Department (SED), Mr. Mohd Yusuf Salbani. He had raised 3 non-conformity reports as a result of the audit. However, there is no evidence that the non-conformity reports have been addressed according to FGV's internal audit procedure. Thus, a non-conformity report was assigned due to this lapse. Management review was conducted on 2/10/2020 where the internal audit outcome was one of the topics being discussed.	Non- compliance
3.8.7	Purchasing and Goods In	The accompanying documents of incoming FFB from own estate are estate's weighing bridge tickets which has the info about name of estate, RSPO certificate	Complied

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Criterion / Indicator	Assessment Findings	Compliance
 i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate's ticket number is recorded in the mill's ticket number. There has been no projected overproduction. Nonetheless, based on interview with the staff, the facility is aware of this requirement. Addressed under "SOP for Mill RSPO SCC" [RSPO SCC, issue: 3 rev: 5, dated 1/9/2019, section "Notis Amaran/Handling Non-conformance Material & Document" which reads if the FFB supplied found to be not certified after being processed, the CPO or PK shall be downgraded to non-certified.	
 3.8.8 Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The 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): a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; 	Minimum information for RSPO certified products is made available in a few documents such as weighbridge ticket, gate-pass, certificate of analysis, etc. <u>Palm Kernel</u> Sampled Contract: RSPG2526W Buyer: name and address were stated in sales contract (<i>but not disclosed in this</i> <i>report</i>) Seller: FPI-Keratong 3 - stated in sales contract Delivery order: Cargo weight: Commodity: RSPO-certified 100% Certificate number: RSPO 693213 Unique identification number – shipping instruction/confirmation (once certified) Shipping announcements were made by FGV marketing department located at Kuala Lumpur headquarter. The list of announcements made can be accessed in the RSPO PalmTrace.	Complied

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Criteri	on / Indicator	Assessment Findings	Compliance
	h) Any related transport documentation;		
	i) A unique identification number.		
3.8.9	Outsourcing Activities	Not applicable as no outsourcing activity.	Not Applicable
	 i) The mill shall not outsource its milling activities. In cases where the mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification 		
	ii) The mill shall ensure the following:		
	a) The mill has legal ownership of all input material to be included in outsourced processes		
	b) The mill 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 mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.		
	c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.		
1	d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations,		



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Criterion / Indicator		Assessment Findings	Compliance
	systems, and all information, when this is announced in advance.		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Not applicable as no outsourcing activity.	Not Applicable
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Not applicable as no outsourcing activity.	Not Applicable
3.8.12	 Record keeping i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. 	FGVPISB Keratong Palm Oil Mill has maintained the accurate, complete, up-to- date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements. Procedure namely Mill RSPO SCC (Mass Balance), SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 has defined at least 2 years of retention time for all records and report. Mass balance recording is done through utilization of "Lembaran Mass Balance" (Mass Balance Sheet). Computerized system in place with the delivery deducted accordingly. Based on verification of Mass Balance Sheet, it was found that the certified CPO and PK were always delivered from positive stock.	Not Applicable

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Criterio	n / Indicator	Assessment Findings	Compliance
	 b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product 		
	ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.		
3.8.13	Extraction Rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Complied
3.8.15	Processing For Identity Preserved Module, the mill 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 products, including during transport and storage to strive for 100% separation.	NA	Not Applicable
3.8.16	 Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are 	Shipping announcements by the mill were represented by FGV marketing department located at Kuala Lumpur headquarters. The list of announcements made can be accessed in the RSPO PalmTrace.	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
	 sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform. 		
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	There had been no claim made using RSPO logo & trademark by Keratong POM. Nonetheless, should there be any claim made, the facility's procedure namely SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, Issue 3, rev. 3, will be implemented to comply with this requirement.	Complied
Genera	I corporate communications		
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Keratong 3 POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.).	Complied
4.2	 In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the 	Not applicable as no off-product claim made by Keratong 3 POM as to date.	Not Applicable

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Criteri	on / Indicator	Assessment Findings	Compliance
	text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by Keratong 3 POM as to date.	Not Applicable
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as no off-product claim made by Keratong 3 POM as to date.	Not Applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Keratong 3 POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	Complied
Busine	ss to business communications		
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the shipping documents (i.e. weighbridge tickets, delivery order), the name of product/commodity with SCC model (e.g. PK MB) and RSPO certificate number; RSPO 693213.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the	Keratong 3 POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable

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Criteri	on / Indicator	Assessment Findings	Compliance
	 requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified 		
Busine	they should follow the requirements outlined in section 5.2.		
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	NA as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	NA as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	NA as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	Not Applicable

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Criter	ion / Indicator	Assessment Findings	Compliance
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	NA as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	NA as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	NA as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	NA as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO- accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified	NA as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	Not Applicable



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Criterion / Indicator	Assessment Findings	Compliance
members. The guidance document for audits is available on <u>www.rspo.org</u> .		
MODULE B – MASS BALANCE SPECIFIC RULES		
Minimum Mass Balance content		
95% or above of the oil palm content must be RSPO MB-certified.	Oil palm claimed for MB certified contain of 100% CPO or PK MB-certified.	Complied
Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Oil palm claimed for MB certified contain of 100% CPO or PK MB-certified.	Complied
Labelling and trademark (MB)		
 Members are allowed to use the RSPO label in one of the following ways: Surrounded by the text: 'Certified sustainable palm oil'. The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. 	As at to date, no RSPO trademark used by Keratong 3 POM.	Not Applicable

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Criterion / Indicator	Assessment Findings	Compliance
• The RSPO label can also include the statement: `[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.		
• Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).		
• In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document.		
Messaging (MB)		•
 Messaging ALLOWED in storytelling in product-related communications includes: [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm 	As at to date, no RSPO trademark used by Keratong 3 POM.	Not Applicable
 oil or palm kernel oil produced by RSPO certified mills and plantations. In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed. 		

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Criteri	on / Indicator	Assessment Findings	Compliance
	 Messaging NOT ALLOWED in storytelling in product-related communications: Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 		
Princip	le 4: Respect community and human rights and deliver	benefits	
Criteri	on 4.1: The unit of Certification respects human rights, which i	ncludes respecting the rights of Human Rights Defenders.	
4.1.1	(C) 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. - Critical (Major) compliance -	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 29/05/2019 where the company recognizes its responsibility to respect and uphold international principles, standards and practices as encapsulated in the Universal Declaration of Human Rights (UDHR), United Nations Guiding Principles on Business and Human Rights (UNGP), United Nations Sustainable Development Goals (UNSDGs) and other applicable treaties, subject to the laws and regulations of the countries and territories in which FGV Group operates. Briefing of the policy was conducted on 17/10/2019 to all the external stakeholders such as FFB suppliers, local communities and government authorities. Besides, briefing to the workers was conducted on 01/09/2020 in Keratong 3 POM and 14/02/2020 in Keratong 11 Estate.	Complied
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	FGV prohibits any form of harassment in their operation as per the policy above. Interviewed with the workers confirmed that no harassment by the management.	Complied
Criteri	on 4.2: 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	(C) 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	FGV has established SOP for " <i>Menangani Aduan dan Rugutan"</i> with Doc. No.: FGV/ML-1A/L2-Pr13 dated 01/04/2019. The procedure is to provide a system for the internal and external stakeholders to lodge complaint and grievances to the management.	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
	requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	The complaints will be solved in 14 days (first stage), 14 days (second stage). The complaint has to be resolved within 2 months from the date of discussion in third stage. Besides, whistleblowing e-form was available in <u>https://www.fgvholdings.com/whistleblowing/</u> for the stakeholders to report a grievance.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Refer to Indicator 4.2.1, the procedures were briefed to the external stakeholders on 17/10/2019 and internal workers on 18/09/2020. Seen the training records. Besides, a memo of channel to lodge grievances and complaints was issued on January 2020 and displayed. Interviewed with the stakeholders confirmed that they are understand on the process of complaint and grievances.	Complied
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 -	 Keratong 3 POM and Keratong 11 Estate has implemented Grievance & Complaint Book and Request Form for Housing Defect (<i>Borang RK 3</i>) to allow the workers to lodge complaint on the housing defect. Sampled the complaint as below: House No.: F-8 dated 04/01/2020 Issue: Water pipe was broken. Action Taken: The management has instructed the contractor to repair on 10/01/2020 and the complainant has acknowledged on the request form after action has been taken. Invoice from the contractor with INV# 0775 dated 05/06/2020 was sighted for the repair work done on House F-8. 	Complied
		 House No.: F-9 dated 05/12/2019 Issue: Mosquitoes netting broken and leakage of roof. Action Taken: The management has instructed the contractor to repair on 10/12/2019 and the complainant has acknowledged on the request form after action has been taken. Invoice from the contractor with INV# 	

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Criterio	n / Indicator	Assessment Findings	Compliance
		 0775 dated 05/06/2020 was sighted for the repair work done on House F-9. 3. Issue: Worker complained the bad road condition on 01/10/2020. Action Taken: The management has arranged for road maintenance and completed on 31/10/2020. Seen the photo evident and found that the road was repaired accordingly. The complainant acknowledged on the complaint form after the complaint has been resolved. 	
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 -	As per SOP for Complaint & Grievance (Doc no: FGV/ML-1A/L2-Pr13 issue 01, revision 02 dated 01.04.2019, under clause 7.1.4 (4th stages) 7.1.4.1 if there is no agreement after complaint lodges to the headquarters, the complaint can be escalated to <i>Jabatan Perhubungan Perusahaan, Kementerian Sumber Manusia</i> or <i>Panel Aduan Persijilan Kelestarian</i> (RSPO or MSPO) as a solution.	Complied
Criterio	n 4.3: The unit of Certification contributes to local sustainable	e 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. - Minor compliance -	Keratong 3 POM and Keratong 11 Estate has made contribution to the local communities such as provide transportation upon request. Besides, interviewed with the school's representative confirmed that the management actively participated the school activities such as the management allows the workers (parents) to attend the meeting organized by the school. Keratong 11 Estate has actively engaged with the stakeholders by inviting them to participate any social activities such as festival celebration. This has verified by interview the smallholder neighbouring the estate. Besides, the mill has provided job opportunity to the local communities where the workforce in the mill is 100% from local communities.	Complied

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Criterie	on / Indicator	Assessment Findings	Compliance
Criterie	on 4.4: 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 con	sent.
4.4.1	 (C) 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. Critical (Major) compliance - 	There is no customary right in Keratong POM as the land is belong to FGV Palm Industries Sdn Bhd. This has verified through the land title # 3693, Lot No.: PT 8122 for the usage of palm oil factory. Keratong 11 Estate was leased to FGV for Oil Palm Plantation activities from FELDA. Tenancy Agreement dated 06/01/2012 and 21/01/2012 which commenced on 01/01/2012 between FELDA and FGV and the agreement will further renew every 3 years up to total 99 years was sighted for Keratong 11 Estate. Seen the land titles as below:	Complied
		 Land title# 3649, Lot No.: PT 8142, 628.7 ha Land title# 3648, Lot No.: PT 8141, 567.7 ha 	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no customary right in Keratong POM and Keratong 11 Estate as the land is belong to FGV Palm Industries Sdn Bhd and FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	Complied
4.4.2a	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. - Minor compliance -	There is no customary right in Keratong POM and Keratong 11 Estate as the land is belong to FGV Palm Industries Sdn Bhd and FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
4.4.2b	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. - Minor compliance -	There is no customary right in Keratong POM and Keratong 11 Estate as the land is belong to FGV Palm Industries Sdn Bhd and FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	Complied
4.4.2c	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. - Minor compliance -	There is no customary right in Keratong POM and Keratong 11 Estate as the land is belong to FGV Palm Industries Sdn Bhd and FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	Complied
4.4.3	 (C) 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). Critical (Major) compliance - 	There is no customary right in Keratong POM and Keratong 11 Estate as the land is belong to FGV Palm Industries Sdn Bhd and FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	There is no customary right in Keratong POM and Keratong 11 Estate as the land is belong to FGV Palm Industries Sdn Bhd and FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	Complied
4.4.5	(C) 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. - Critical (Major) compliance -	There is no customary right in Keratong POM and Keratong 11 Estate as the land is belong to FGV Palm Industries Sdn Bhd and FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles	Complied

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Criteri	on / Indicator	Assessment Findings	Compliance
		and interviewed with stakeholder confirmed that there is no any land dispute reported.	
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There is no customary right in Keratong POM and Keratong 11 Estate as the land is belong to FGV Palm Industries Sdn Bhd and FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	Complied
		d where it can be demonstrated that there are legal, customary or user rights, wit d other stakeholders to express their views through their own representative institu	
4.5.1	 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance - 	There was no new planting in Keratong 11 Estate. There was no acquisition of new land sighted.	Complied
4.5.2	(C) 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.	There was no new planting in Keratong 11 Estate. There was no acquisition of new land sighted.	Complied
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.	There was no new planting in Keratong 11 Estate. There was no acquisition of new land sighted.	Complied



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Criteri	on / Indicator	Assessment Findings	Compliance
	Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -		
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 -		Complied
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 -	There was no new planting in Keratong 11 Estate. There was no acquisition of new land sighted.	Complied
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. - Minor compliance -	There was no new planting in Keratong 11 Estate. There was no acquisition of new land sighted.	Complied
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 -	There was no new planting in Keratong 11 Estate. There was no acquisition of new land sighted.	Complied



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Criteri	on / Indicator	Assessment Findings	Compliance
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.- Critical (Major) compliance -	There was no new planting in Keratong 11 Estate. There was no acquisition of new land sighted.	Complied
	on 4.6: Any negotiations Concerning compensation for loss of less, local communities and other stakeholders to express their view	egal, customary or user rights are dealt with through a documented system that ena ws through their own representative institutions.	ables indigenous
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	FGV has developed procedure on " <i>Pengenalpastian dan penyelesaian pertikaian tanah</i> " with Doc. No. ML-1A/L1-Pr10(0) dated 01/06/2016. The objective of the procedure is to handle and monitor issue raised from local communities on customary or user rights. Procedure on the compensation to the people entitled and monitoring of boundary stone was detailing in the procedure. Compensation will be paid according to basic cost/ acre and market land price.	Complied
4.6.2	(C) 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. - Critical (Major) compliance -	Refer to Indicator 4.6.1.	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 -	No issues related to loss of legal customary rights with indigenous peoples, local communities, settlers and other stakeholders reported during the time of audit through interviewed with the settler and smallholder. Boundary stone and trenches were available to demarcate the boundary of land between the neighbouring stakeholders.	Complied
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.	No issues related to loss of legal customary rights with indigenous peoples, local communities, settlers and other stakeholders reported during the time of audit through interviewed with the settler and smallholder. Boundary stone and	Complied

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Criteri	on / Indicator	Assessment Findings	Compliance
	- Minor compliance -	trenches were available to demarcate the boundary of land between the neighbouring stakeholders.	
	on 4.7: Where it can be demonstrated that local peoples ha shment of rights, subject to their FPIC and negotiated agreeme	ve legal, customary or user rights, they are compensated for any agreed land ents.	acquisitions and
4.7.1	 (C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance - 	FGV has developed procedure on " <i>Pengenalpastian dan penyelesaian pertikaian tanah</i> " with Doc. No. ML-1A/L1-Pr10(0) dated 01/06/2016. The objective of the procedure is to handle and monitor issue raised from local communities on customary or user rights. Procedure on the compensation to the people entitled and monitoring of boundary stone was detailing in the procedure. Compensation will be paid according to basic cost/ acre and market land price.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal 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. - Critical (Major) compliance -	Refer to Indicator 4.7.1.	Complied
4.7.3	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. - Minor compliance -	There is no customary right land in Keratong 11 Estate. Therefore, the clause is not applicable.	Not Applicable
Criterio rights.	on 4.8: The right to use the land is demonstrated and is not least	gitimately contested by local people who can demonstrate that they have legal, cu	stomary, or user
4.8.1	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,	There is no customary right land in Keratong 11 Estate. Therefore, the clause is not applicable.	Not Applicable

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Criterion / Indicator		Assessment Findings	Compliance
av co of	stomary, or user rights at the time of acquisition is ailable and provided to parties to a dispute, and that any mpensation was accepted following a documented process FPIC. 4 inor compliance -		
cei res im ca: ad co	C) Land conflict is not present in the area of the unit of rtification. Where land conflict exists, acceptable conflict solution processes (see Criteria 4.2 and 4.6) are plemented and accepted by the parties involved. In the se of newly acquired plantations, the unit of certification ldresses any unresolved conflict through appropriate nflict resolution mechanisms. Critical (Major) compliance -	There is no customary right land in Keratong 11 Estate. Therefore, the clause is not applicable.	Not Applicable
or to de wil 4.4	here there is evidence of acquisition through dispossession forced abandonment of customary and user rights prior the current operations and there remain parties with monstrable customary and land use rights, these claims Il be settled using the relevant requirements (Indicators 4.2, 4.4.3 and 4.4.4) Minor compliance -	There is no customary right land in Keratong 11 Estate. Therefore, the clause is not applicable.	Not Applicable
dis inv co	r any conflict or dispute over the land, the extent of the sputed area is mapped out in a participatory way with volvement of affected parties (including neighbouring mmunities where applicable). Anor compliance -	There is no customary right land in Keratong 11 Estate. Therefore, the clause is not applicable.	Not Applicable

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Criterio	on / Indicator	Assessment Findings	Compliance
Criterio	on 5.1: The unit of certification deals fairly and transparently w	vith 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 -	<u>FGVPISB Keratong 3 Palm Oil Mill</u> FGV Trading Sdn. Bhd. (FGVTSB) under FFB Purchased Department has established Data Bank online to determine FFB pricing. FFB pricing is based on Malaysian Palm Oil Board (MPOB) published prices updated regularly (daily basis) and displayed at the FGVPISB Keratong 3 Palm Oil Mill weighbridge.	Complied
		FGVPISB Keratong 3 Palm Oil Mill maintains records of FFB prices, including the payment. Sighted the FFB price from January to November 2020 maintained at the office as well as the payment made to the respective smallholder.	
5.1.2	 (C) 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). - Critical (Major) compliance - 	FGVPISB Keratong 3 Palm Oil Mill An explanation is made normally through a meeting. Sighted the minute meeting for "Jawatankuasa Permaufakatan, Productivity dan Kualiti (JPPK)" which was conducted on 8 th November 2020 with a total attendance of 15 participants representing FGVPISB Keratong 3 Palm Oil Mill, FGVPMSB Estates, Felda Technoplant and FFB Dealers. The venue of the meeting is at the FGVPMSB Keratong 4 estate and the agenda of the meeting as follows :	Complied
		1. Discussion about FFB Quality	
		2. Performance of FFB Production and OER achievement	
		3. FFB Price briefing	
		4. Issue at Palm Oil Mill such as breakdown	
		5. Q & A	
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.	FGVPISB Keratong 3 Palm Oil Mill The Palm Oil Mill Management has provided FFB pricing daily based on MPOB pricing. Smallholders are then paid based on the OER for their crop.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
- Critical (Major) compliance -		
	Sighted Memo from FGV Trading Sdn. Bhd. dated 11 th March 2020 Memo : (44) FGVTSB/FFBPD/HQ/01 regards of " maklumat tawaran harga belian BTS". FGV Trading Sdn. Bhd. has offered 3 types of the price which categorize into Price A, Price B and Price C.	
	Price A – Price determine based on the Actual Price announced by	
	MPOB. The price offered to organized smallholder under	
	Felda Scheme, FGV Estates and Felda Technoplant	
	Price B – Price determine based on the Actual Price announced by	
	MPOB. The price offered to independent smallholder and	
	FFB dealer which no specific sale agreement has been	
	establised between both parties (Buyer (Palm Oil Mill) and	
	FFB supplier)	
	Price C – Price determine based on the monthly price agreed by	
	both parties (Buyer (Palm Oil Mill) and FFB supplier). The	
	price is offered to a third party that has a specific sale	
	agreement and agreed on FFB volume supply to FGVPISB	

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Criterion / Indicator Assessment Findings Compliance Keratong 3 Palm Oil Mill. FGVPISB Keratong 3 Palm Oil Mill (C) Evidence is available that all parties, including women 5.1.4 Complied FFB Purchased Department is responsible to determine the FFB Price between and independent representative organisations assisting FGV Trading Sdn. Bhd. (FGVTSB) and Smallholders. Once both parties have smallholders where requested, are involved in decisionagreed with the term and conditions, a contract agreement will be issued to the making processes and understand the contracts. These respective smallholder. include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and Sighted the minute meeting for "Jawatankuasa Permaufakatan, Productivity dan or other support mechanisms where applicable. Kualiti (JPPK)" which was conducted on 8th November 2020 with a total of - Critical (Major) compliance attendance of 15 participants representing FGVPISB Keratong 3 Palm Oil Mill, FGVPMSB Estates, Felda Technoplant and FFB Dealers. The venue of the meeting is at the FGVPMSB Keratong 4 Estate and the agenda of the meeting as follows 1. Discussion about FFB Quality 2. Performance of FFB Production and OER achievement 3. FFB Price briefing 4. Issue at Palm Oil Mill such as breakdown 5. Q & A FGVPISB Keratong 3 Palm Oil Mill Contracts are fair, legal and transparent and have an agreed Complied 5.1.5 All the contract agreements are available and kept in FGV Trading Sdn. Bhd. timeframe. (FGVTSB) in HQ. Requests for official documents through the Palm Oil Mill office - Minor compliance will have to go through the Palm Oil Mill Assistant Manager in charge, who will forward the request to Palm Oil Mill Manager for approval. FFB suppliers other than the management of Felda Technoplant are free whether or not to sell their crop to FGVPISB Keratong 3 Palm Oil Mill. Thus no contract

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Criterio	n / Indicator	Assessment Findings	Compliance
		agreement necessary. Nonetheless, the suppliers have to be registered in the Palm Oil Mill's database which has information about names and MPOB license to name a few. The FFB price is displayed at the point of entry of the weighbridge.	
		Sighted the Contract Agreement between FGVPISB Keratong 3 Palm Oil Mill with FFB dealer. Term and condition outline in the agreement are :	
		 Agreement term Price formulation based on 1% KPG Extraction rate Price per ton of FFB Special terms Palm Oil Mill Acknowledgement Specification of FFB Termination terms Payment Terms Acknowledgement On top of the term and conditions stated in the contract agreement, the attachment of annex (Supply Code of Conduct and Purchase Order Terms and 	
		Conditions (PB) and Work order (PK)) was briefed and signed by both parties; (Buyer (Palm Oil Mill) and FFB supplier). Based on the Payment term between FGVPISB Keratong 3 Palm Oil Mill with FFB Supplier, the agreed timeframe for payment is within 30 days.	
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	<u>FGVPISB Keratong 3 Palm Oil Mill</u> Review on payment records found that all payment was made promptly. The payment process and approval was made at the FGV Trading Sdn. Bhd. (FGVTSB) and Finance Department at HQ Level. Palm Oil Mill Management will	Complied

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Criteri	on / Indicator	Assessment Findings	Compliance
	- Critical (Major) compliance -	prepare the monthly performance summary of FFB delivered to FGVPISB Keratong 3 Palm Oil Mill for every FFB supplier and forward to HQ for approval. Final payment will issue to the respective FFB supplier.	
		Sighted the weight bridge ticket, weekly summary of FFB, payment instruction report, interface reports payment data by supplier, SSC auto-debit request–External FFB Providers and SAP report. All these document is necessary for the chief clerk to prepare as a payment procedure before proceed with final payment to FFB supplier	
		Sighted evidence of payment to FFB supplier as below;	
		1. Supplier FFB: Bakti Mas Bina Sdn. Bhd. FFB Delivery period as at 18 th October 2020 Total Tonnage: 141.93 Payment: Payment has been made on 21 st October 2020 amounted RM 83,517.50	
		 2. Eng Huat Latex Concentrate Sdn. Bhd. FFB Delivery period as of 13th October 2020 Total Tonnage: 169.47 MT Payment : Payment has been made on 20th October 2020 amounted to RM 98,757.60 	
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 - 	FGVPISB Keratong 3 Palm Oil Mill Based on record, the latest weighing equipment calibration dated 26 th October 2020. The calibration was conducted by Metrology Corporation Malaysia Sdn. Bhd.	Complied
		Sighted the determination of weights and measurement for 2 units of weight bridge at FGVPISB Keratong 3 Palm Oil Mill as follows;	

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Criterie	on / Indicator	Assessment Findings	Compliance
5.1.8	The unit of certification supports Independent Smallholders	 Borang D (Timbang dan Sukat) Siri Number: B1586807 No. Penentuan : CKU-ATK-021750 Capacity : 70 MT Valid : 3rd December 2019 – 3rd December 2020 Borang D (Timbang dan Sukat) Siri Number : B844688378 No. Penentuan : C1-ATK 00265 Capacity : 50 MT Valid: 26th October 2020 – 26th October 2021 FGVPISB Keratong 3 Palm Oil Mill 	Complied
	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 Palm Oil Mill certification unit does not deal with the organized smallholders directly but rather with the management agencies such as Felda Technoplant and Felda. FFB suppliers other than the management of Felda and Felda Technoplant are free whether or not to sell their crop to FGVPISB Keratong 3 Palm Oil Mill. Thus no contract agreement necessary.	
		As per an interview with Palm Oil Mill Manager, Independent Smallholder is certified under MSPO Part 2 category – General Principles for Independent smallholder (ISH). At the moment Malaysia Palm Oil Board (MPOB) is the government agency that is responsible to support the ISH with certification.	
5.1.9	 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance - 	<u>FGVPISB Keratong 3 Palm Oil Mill</u> FGV Palm Industries Sdn. Bhd (FGVPISB) has established The mechanism for Request and Respond, Consultation & Meeting and Complaint & Grievances, dated 1 st April 2019. Document No: FGV/ML-1A/L2-Pr13. Sighted the process flow for the compliant procedure which stated the time frame to close and respond.	Complied



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Criteri	on / Indicator	Assessment Findings	Compliance
		So far no complaint from organized smallholder under Felda, Felda Technoplant and other FFB suppliers at the moment.	
Criteri	on 5.2: The unit of certification supports improved livelihoods of	of smallholders and their inclusion in sustainable palm oil value chains.	
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 -	FGVPISB Keratong 3 Palm Oil Mill Addressed in the Smallholder Living Standard Improvement Plan Among the action plans established were: • To provide job opportunity • To continue to purchase the FFB from the smallholders • To contribute in term of supplying EFB and POME as fertilizer • Commitment to sustainable business • To be open in term of discussing and handling issues and grievances	Complied
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 -	FGVPISB Keratong 3 Palm Oil Mill Based on the Smallholder Living Standard Improvement Plan, one of the plans is a commitment to sustainable business which covers the initiative to assist the smallholders in conforming to the RSPO & MSPO standard and complying with the legal requirements. Program of GAP (Good Agriculture Practice) for livelihood is a program to promote sustainability amongst the smallholder to promote better livelihood.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	FGVPISB Keratong 3 Palm Oil Mill Based on the Smallholder Living Standard Improvement Plan, one of the plans is a commitment to sustainable business which covers the initiative to assist the smallholders in conforming to the RSPO & MSPO standard and complying with the legal requirements.	Complied

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Criterie	on / Indicator	Assessment Findings	Compliance
5.2.4	 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance - 	<u>FGVPISB Keratong 3 Palm Oil Mill</u> The Felda settlers are having an agreement with other Felda's management agencies, for example, Felda Technoplant. Therefore, the settlers are considered as scheme smallholders to those agencies but not to FGV. Thus, this indicator does not apply to this certification unit since the settlers are out of their scope.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	<u>FGVPISB Keratong 3 Palm Oil Mill</u> Sighted the minute meeting for "Jawatankuasa Permaufakatan, Productivity dan Kualiti (JPPK)" which was conducted on 8 th November 2020 with a total of attendance of 15 participants representing FGVPISB Keratong 3 Palm Oil Mill, FGVPMSB Estates, Felda Technoplant and FFB Dealers. The venue of the meeting is at the FGVPMSB Keratong 4 estate and the agenda of the meeting as follows:	Complied
		1. Discussion about FFB Quality	
		2. Performance of FFB Production and OER achievement	
		3. FFB Price briefing	
		4. Issue at Palm Oil Mill such as breakdown	
		5. Q & A	
Princip	le 6: Respect workers' rights and conditions		
Criterie	on 6.1: Any form of discrimination is prohibited.		
6.1.1	(C) 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. - Critical (Major) compliance -	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 29/05/2019 where all employees and workers shall receive equal treatment based on their relevant merits and competency regardless of gender, race, nationality, religion, age, physical condition, and marital status, reproductive rights of women, union membership/ affiliation/ employment status, or political affiliation. Briefing of the policy was conducted on 17/10/2019 to all the external stakeholders such as FFB suppliers, local communities and	Complied

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Criteri	on / Indicator	Assessment Findings	Compliance
		government authorities. Besides, briefing to the workers was conducted on 01/09/2020 in Keratong 3 POM and 14/02/2020 in Keratong 11 Estate.	
6.1.2	 (C) 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. Critical (Major) compliance - 	Interview and verified through salary slips shows that there is no discrimination in terms of salary payment especially for similar work scope. FGV has committed that no recruitment fee imposed to foreign workers. Please refer to indicator 6.6.1 for more detail assessment.	Complied
6.1.3	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. - Minor compliance -	Employment procedure was established, and details refer to indicator 3.5.1 and 3.5.2. Besides, Collective Agreement (valid from 01/01/2019 to 31/12/2021) has clearly mentioned the criteria of promotion based on the capability, qualification and performance of interview of the candidates.	Complied
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	There is no female worker works in mill process and estate operation. Female workers mainly work in the office of mill and estate. No pregnancy test been conducted for job selection. Pregnant worker will still be offered to continue work in office or light work. This is confirmed through the interview session with Gender Committee member.	Complied
		<i>Borang Pemeriksaan Kesihatan Pekerja Ladang Tempatan</i> (Health Inspection for Local Workers Form) could be improved as there was a criterion for female to inform if she is pregnant prior the employment. (OFI)	
a	 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance - 	Gender Committee was established in Keratong 3 POM and Keratong 11 Estate to discuss the issues raised by female workers and raise awareness. Meeting and activities were conducted by the committee.	Complied
		The last meeting was conducted on 29/02/2020 in Keratong 3 POM and 14/02/2020 in Keratong 11 Estate. Meeting minutes was sighted. Procedure of	

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Criterion / Indicator Assessment Findings Compliance Handling Complaint and Grievances related to sexual harassment and function of the Gender Committee was briefed during the meeting. Rights of the pregnant women and breast-feeding mother was respected and taken care where the female workers will be not assigned for chemical handling job. No issue related to sexual harassment and violence was reported during the meeting. Interviewed with the female workers confirmed that no case of sexual harassment and violence reported. They have a WhatsApp group act as a channel for the committee to report if there is any case. The female workers employed in FGV are mainly local Malaysian. Female workers 6.1.6 There is evidence of equal pay for the same work scope. Complied employed are generally office clerk and caretaker for the housing. Reviewed - Minor compliance payslips in both Keratong 3 POM and Keratong 11 Estate which consists of male and female workers found that their salary is the same for the same job scope. They were paid according to the Minimum Wage Order 2020 without any discrimination. Criterion 6.2: 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). (C) Applicable labour laws, union and/or other collective FGV Palm Industries Sdn Bhd has sign the Collective Agreement with *Kesatuan* Complied 6.2.1 agreements and documentation of pay and conditions are Pekerja-pekerja FGV Palm Industries Sdn Bhd Semenanjung which valid from available to the workers in national languages (English or 01/01/2019 to 31/12/2021 (Keratong 3 POM) and FGV Plantations (Malaysia) Bahasa Malaysia) and explained to them in language they Sdn Bhd has signed Collective Agreement Kesaturan Pekerja-pekerja FGV understand. Plantations (Malaysia) Sdn Bhd Semenanjung which valid from 01/01/2019 to 31/12/2021. Details such as promotion, notice period, resignation, annual leave - Critical (Major) compliance and overtime were outlined in the agreement. Sample of workers agreement are reviewed, and the agreements are signed in Bahasa Malaysia as all the workers in mill are local Malaysian. Interview with workers confirmed that they have signed the agreement and the content of agreement and Collective Agreement was briefed to them. All the workers have given a copy of the Collective Agreement.

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Criterion / Indicator Assessment Findings Compliance The foreign workers have been briefed and signed the agreement in their home country in the local language during the pre-employment process and prior to Malaysia. This has verified with the workers confirmed that the terms and conditions were briefed during the pre-employment process and when they signed the contract. 6.2.2 (C) Employment contracts and related documents detailing Sample of workers agreement are reviewed, and the agreements are signed in Complied payments and conditions of employment (e.g. regular their local language (i.e. Hindi, Bahasa Malaysia/Indonesia). working hours, deductions, overtime, sick leave, holiday Please refer to indicator 6.6.1 for more details. 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. - Critical (Major) compliance -30 samples for workers in various operations including harvester, field workers (C) There is evidence of legal compliance for regular working Complied 6.2.3 and general workers were verified. Overtime count was appropriate, and hours, deductions, overtime, sickness, holiday entitlement, deduction was deducted fairly following the agreement and approval from the maternity leave, reasons for dismissal, period of notice and Department of Human Resource. There was two dismissal of workers since last other legal labour requirements. assessment who were unfit to work due to health condition. Therefore, the - Critical (Major) compliance management has decided to send them back to the home country. Seen the records of termination of contract and interviewed with the one of the workers who will back on 11/12/2020 confirmed that the flight ticket was purchased by the company without any payment from him. There was no penalty of termination by the company as informed. 6.2.4 (C) The unit of certification provides adequate housing, All workers are provided with housing facilities that furnish with sanitation OFI sanitation facilities, water supplies, medical, educational and facilities, water supplies, electricity and amenities such praying house. Water and electricity are connected to the national supply and grid. Water usage is welfare amenities to national standards or above, where no

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Criteri	on / Indicator	Assessment Findings	Compliance
	such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed	subsidized by the company and these conditions are stated in the collective agreement. Interview with workers confirms that there is no issue related to the payment of water and electricity. Budget has been allocated to upgrade/ repair the housing defect.	
	detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.	As the estates are located township, any medical attention needed will be referred to government clinic or Panel Clinic.	
	- Critical (Major) compliance -	Line site inspection was conducted once every two weeks by the staff using the Housing Checklist for Keratong 3 POM. The last inspection was conducted on 22/11/2020 and verified by the Assistant Manager. All the areas such as main road, drainage, septic tank and others were inspected. The line site inspection in Keratong POM could be further improved to ensure the actual issue is recorded in the checklist.	
		Keratong 11 Estate has carried out line site inspection to ensure the cleanliness and safety of the houses by person in charge. The housing complex was in clean and good condition as verified during site visit.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	Location of mill and estate was inside the vicinity of FGV Settlers village and access to town is available by public transport. Groceries shops and restaurants are sighted, and the workers are easily access to adequate, sufficient and affordable food.	Complied
6.2.6	A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.	FGV Keratong 3 Complex has established the prevailing wage calculation to include all the in-kind benefits provided to the workers. Sampled the prevailing wages for benefit of Housing – RM 250 for local workers and RM 200 for foreign	Complied
	PROCEDURAL NOTE:	workers. The prevailing wages is more than the Minimum Wage Order 2020.	
	STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE		
	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 endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living		

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Criterion / Indicator	Assessment Findings	Compliance
Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam 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). <i>Where a GLWC living wage standard (benchmark), or one that fulfils 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>		
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.		
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 (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).		
Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of		

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Criterion / Indicator		Assessment Findings	Compliance
	 a DLW with specific targets, and a phased implementation process including: Updated assessment on prevailing wages and in-kind benefits There is annual progress on the implementation of living wages 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 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. Minor compliance - 		
		There are no casual workers hire in Keratong 3 POM and Keratong 11 Estate. All the employees are permanent employee. Sorters in POM and FFB Lorry Driver in Keratong 11 Estate was carried out by contractors where the workers are permanent.	
	personnel.		5 5
6.3.1	 (C) 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. Critical (Major) compliance - 	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 29/05/2019 where FGV commits to respect employees' and workers' right to freedom of movement, fair working hours, freedom of association and right to decent living condition. FGV respect the rights of all its employees and workers to join and form association, and to bargain collectively. Briefing to the workers was conducted on 01/09/2020 in Keratong 3 POM and 14/02/2020 in Keratong 11 Estate.	Complied

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Criterion / Indicator Compliance **Assessment Findings** FGV Palm Industries Sdn Bhd has made a collective agreement with the Kesatuan 6.3.2 Minutes of meetings between the unit of certification with Complied Pekerja-pekerja FGV Palm Industries Sdn Bhd Semenanjung which valid from trade unions or workers representatives, who are freely 01/01/2019 to 31/12/2021. Therefore, Workers' Association was established to elected, are documented in national languages (English act as a channel for the workers to express their issues related to work. The last and/or Bahasa Malaysia) and made available upon request. meeting was conducted on 15/07/2020 and meeting minutes was sighted. - Minor compliance -Interviewed with the Chairman of the Workers' Association confirmed that there was only minor issue raised such as increment of salary and bonus pay-out if there is any as recorded in the meeting minutes. Keratong 11 Estate has established Workers' Welfare Association to discuss issue of the workers. The last meeting was conducted on 30/10/2020 where the meeting was attended by representatives from different nationalities. There was no issue reported by the workers' representatives. Management has informed the issue of concern during the meeting. Interviewed with the Chairman of Workers' Association in Keratong 3 POM Complied 6.3.3 Management does not interfere with the formation or confirmed that the election was carried out by the workers without any operation of registered unions/ labour organisations or interference from the management. associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -Criterion 6.4: Children are not employed or exploited. FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 A formal policy for the protection of children, including Complied 6.4.1 dated 29/05/2019 where the company commits to eliminate any form of child prohibition of child labour and remediation is in place, and labour and this has stated in the Supplier Code of Conduct which signed by every included into service contracts and supplier agreements. suppliers and contractors that engaged by the company. - Minor compliance -As per the company policy (refer to SCOC), the minimum age for employment Complied (C) There is evidence that minimum age requirements are 6.4.2 of workers is above 18 years old. For recruitment of foreign workers, the main met. Personnel files show that all workers are above the criteria must be within 18 – 45 years old. Before interview for local worker, they

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Criterio	on / Indicator	Assessment Findings	Compliance
	national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -	are required to submit copy of certificate of education and identification card for age verification. Reviewed the master list of employees found that no child labour was employed.	
6.4.3	 (C) Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance - 	Verification on the passport details, identity card details and worker list confirmed there is no young person employed or found during this assessment.	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 -	The management has communicated the Group Sustainability Policy and Supplier Code of Conduct (SCOC) to the third party, FFB suppliers and local communities during stakeholder meetings and before providing services to the company.	Complied
Criterio	6.5: There is no harassment or abuse in the workplace, and	reproductive rights are protected.	
6.5.1	 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance - 	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 29/05/2019 where the company does not tolerate any form of sexual harassment violence and abuse. Briefing to the workers was conducted on 01/09/2020 in Keratong 3 POM and 14/02/2020 in Keratong 11 Estate.	Complied
6.5.2	 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance - 	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 29/05/2019 where all employees and workers shall receive equal treatment based on their relevant merits and competency regardless of gender, race, nationality, religion, age, physical condition, and marital status, reproductive rights of women, union membership/ affiliation/ employment status, or political affiliation. Briefing to the workers was conducted on 01/09/2020 in Keratong 3 POM and 14/02/2020 in Keratong 11 Estate.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.5.3	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. - Minor compliance -	Keratong 3 POM:There was an assessment conducted to identify new mother in the mill (inclusive wife of the worker). The assessment was conducted on 04/09/2020 and 01/11/2020 and questionnaire was done to identify their needs as a new mother. The management has developed the action plan for the needs of the new mother 	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	FGV has established ' <i>Prosedur Menangani Aduan Melalui Jawatankuasa Wanita'</i> with Doc. No.: ML-1A/L2-PR10(1) dated Jan 2020. The objective of the procedure is to establish a mechanism to handle any issues related to gender for all the employees and housewives living in the compound. Channel of complaint lodge has outlined in the procedure such as verbal and written. The appointed committee need to forward the complaint to Regional Gender Committee within 1 week from the date of complain received. If the case is unresolved, the committee will forward the case to <i>Talian Nur (Kementerian Pembangunan Wanita, Keluarga & Masyarakat)</i> through 15999/ SUHAKAM/ <i>Jabatan Tenaga Kerja Semenanjung Malaysia.</i> The management will protect the identity of the complainant if they wish not to reveal.	Complied
Criterio	on 6.6: No forms of forced or trafficked labour are used.	·	
6.6.1	 (C) All workers have entered into employment voluntarily and the following are prohibited: Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees. 	Sample of employment contracts for checkroll foreign workers has clearly stated the passport is responsible to keep and protect their own passport; FGV will bare all recruitment fees such as medical, transportation from airport to Malaysia, visa as stated in the Communications Pack which will briefed to the candidates during pre-employment process in home country and agreement with the agent in source country; Workers have signed agreement in home country where the	Complied

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Criterion / Indicator Compliance **Assessment Findings** Contract substitution terms and conditions are identical without any contract substitution; overtime is based on request of workers and as per FGV's policy, developed Overtime Policy Involuntary overtime (Policy No.: FGV/GHC/POL/006, Rev. 4 dated 01/01/2020) to comply with the Lack of freedom of workers to resign Employment Act 1955; there is no debt and wages withholding through Penalty for termination of employment interviewed with the workers; and workers can terminate the contract with 30 days of notice period without any penalty of termination. • Debt bondage • Withholding of wages - Critical (Major) compliance -The foreign workers in Keratong 11 Estate has acknowledged on a form where they kept the passport by themselves using the locker prepared by the management. They have been given with the key of the locker where they can access to the passport without any restriction. They need to submit the passport at least 4 months prior the expiry of the permit as per stated in the employment contract. Interviewed with the workers confirmed that they have kept the passport at the locker. There was one worker that arrived on 17/12/2019 was found unfit to work due to health condition. Therefore, the management has decided to send him back to the home country. Seen the records of termination of contract and interviewed with the worker confirmed that the flight ticket was purchased by the company without any payment from him. His flight was on 11/12/2020. (C) Where temporary or migrant workers are employed, a FGV Group has developed Guidelines and Procedures for Responsible 6.6.2 Complied specific labour policy and/or procedures are established and Recruitment of Foreign Workers dated 27/6/2019. The guidelines are adopted implemented. the principles embedded in the Group Sustainability Policy including nondiscrimination, respect for human rights and labour rights as well as health and - Critical (Major) compliance safety. Workers will be signed on the contract of employment and that is nontransferable to other workers and cannot be substituted. The appointed recruitment agent in the source country shall bear all the costs during recruitment process. Workers will undergo orientation program and briefed on

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Criterion / Indicator	Assessment Findings	Compliance
	their rights, terms and conditions in the contract of employment and relevant labour and immigration laws. All necessities and accommodation will be provided to the workers in accordance with the legal requirements and standards to ensure decent living conditions for workers. Interviewed with the new workers employed confirmed that they were treated equally, signed agreement in home country where the terms and conditions are identical without any contract substitution, provide decent living conditions and induction training during their arrival in One-Stop Centre.	
	However, some of the workers informed that they have paid 70,000 India Rupee to the agent for visa, medical and transportation cost from airport in home country to Malaysia. As explained by the representative of JTK from FGV, they have signed agreement with the approved agents for India and Indonesia and outlined all the terms and conditions in the agreement. In the agreement, the agents agreed not to collect any fees from workers during the recruitment process. The cost of the recruitment process was detailed out in the agreement. Besides, the candidates were briefed on the "Communication Pack" during the pre-employment process. The contents of communication pack are such as working terms and conditions and cost to be borne by the company and employees. Seen the presentation slides that presented to the candidates in home country and this has confirmed with the workers. Besides, the company	
	has taken initiative to carry out Foreign Labour Recruitment Verification Audit to ensure the compliance of the agents. The representatives from Sustainability Compliance & Certification Enforcement – Group Sustainability Division have conducted the audit on $5 - 7/11/2019$ to the agents in Indonesia. Findings were raised, and action plan was developed accordingly. FGV has planned to conduct the audit in India. However, due to outbreak of Covid-19 pandemic and travel restriction, the plan has been postponed. In additional, FGV has conducted briefing on the Communication Packs and the company's policies to agents engaged by FGV on $10 - 12/10/2020$ (Agents of India) and $16/10/2020$ (Agents of Indonesia). Furthermore, FGV will implementing Employee Declaration Form	

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Criteri	on / Indicator	Assessment Findings		Compliance
		where the workers have to fill in the Malaysia and this have to be signed by		
Criteri	on 6.7: The unit of certification ensures that the working enviro	onment under its control is safe and with	nout undue risk to health.	
6.7.1	 6.7.1 (C) The responsible person(s) for H&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. Critical (Major) compliance - 	Keratong 3 has appointed En. Azlie Sl Health and Safety at the unit on 15/7/ The last four meetings were conducted		OFI
		Meeting	Date conducted	
		OSH Committee Meeting 03/2020	28/9/2020	
		OSH Committee Meeting 02/2020	29/6/2020	
		OSH Committee Meeting 01/2020	17/2/2020	
		OSH Committee Meeting 04/2019	9/12/2020	
		Among the agenda discussed were: <i>i) Perkara berbangkit dari mesyuara</i> . <i>ii) Laporan prestasi keselamatan dari</i> . <i>iii) Laporan audit QOSHE</i> <i>iv) Laporan pemantauan alam sekitar</i> <i>v) Laporan program keselamatan dari</i> . <i>vi) Laporan keselamatan/kejadian me</i> <i>vii) Rungutan dari pihak yang berkepe</i> <i>viii) Hal-hal berkaitan</i> <i>ix) Pemeriksaan stesen</i>	n kesihatan pekerjaan n kesihatan pekerjaan prbahaya	

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Criterion / Indicator	Assessment Findings		Compliance		
		The method of maintaining the minutes of meeting of the OSH committee at Keratong3 POM can be further improved by ensuring the past 7 years minutes are still in place.			
	Keratong 11 Estate has appointed En. I the Health and Safety at the unit on 03				
	The last four meetings were conducted as follows: Meeting Date conducted				
	Meeting				
	OSH Committee Meeting 03/2020	2/9/2020			
	OSH Committee Meeting 02/2020	3/6/2020			
	OSH Committee Meeting 01/2020	20/2/2020			
	OSH Committee Meeting 04/2019	18/11/2020			
	Among the agenda discussed were:				
	i) Perkara berbangkit dari mesyuarat	lepas			
	ii) Laporan kemalangan				
	iii) Laporan keracunan/penyakit peker	<i>jaan</i>			
	iv) Laporan kejadian berbahaya v) Laporan bencana alam/perusahaal	2			
	vi) Laporan kejadian alam sekitar	1			
	vii) Laporan siasatan insiden				
	viii) Latihan keselamatan dan kesihatai				
	ix) Pemeriksaan tempat kerja/kenalpa				
	x) Tindakan penambahbaikan laporai				

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Criterion / Indicator	Assessment Findings	Compliance
	xi) Program pemantauan penggunaan PPE	
	xii) Program pemeriksaan jentera pertanian	1
	xiii) Program keselamatan motosikal	1
	xiv) OSH System (MS1722/OHSAS 18001)	1
	xv) Laporan hygiene	1
	xvi) Hal-hal lain KKP	l
	The previous 7 years minutes of meeting were also well maintained. Verified minutes #01-04/2014 and #01-04/2015.	

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Criterio	n / Indicator	Assessment Findings	Compliance
6.7.2	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. - Minor compliance -	FGVPISB Keratong 3 POM Procedure for Emergency Response Plan (ERP) was established and defined in procedure <i>Prosedur Kerja Selamat – Pertolongan Cemas</i> (Doc. Number – FPI-PK-035). The following emergency response plans were available addressing the following incidents: • CPO leakage/spillage • Diesel leakage/spillage • Fire breakout at the mill • Collapse of building/roofing • Industrial accident Latest fire evacuation drill was done on 14/2/2020. Firefighting system inspection carried on quarterly basis. The inspection includes fire extinguisher inspection, fire hydrant and hose reel. Accident and emergency procedures have been communicated to employees. Workers trained in First Aid were present in the mill operation. Records of accidents are kept and reviewed in the OSH Meeting every 3 months as verified through the meeting minutes. FGVPM Keratong 11 Estate The Emergency Response Plan for Minor Accidents, Fire, Spillage and Poisoning was established in the FGV Emergency Response Procedure (<i>Menghadapi Kecemasan</i>) – FGV/ML-1A/L2-Pr15. The estate also has a list of personals to contact in case of any emergency.	Complied
6.7.3	(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the		Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
	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. - Critical (Major) compliance -	boots, safety helmets, ear plugs, face shield, leather gloves and straw hats. In addition, the operators have also been given training regarding the usage, safety and health issue by the Mill Manager with knowledge on Safe Operating Procedure. Sanitation facilities are available for those handling chemicals in the form of a shower room. Records of PPE issuance were well maintained in a file which has the information about names & signatures of recipients, types of job, dates of issuance and types of PPE issued. The last training on PPE usage was conducted on 22/1/2020.	
		Operators for Keratong 11 Estate have been provided with proper Personal Protective Equipment. Observed during site visit, the PPE provided to the operators such as safety boots, safety helmets, gloves, aprons, respiratory masks, etc. The operators have also been trained on the PPE usage, safety and health issues by the management. Sanitation facilities were also available onsite for operators handling chemicals in terms of shower room and PPE store.	
6.7.4	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 -	Medical care is provided to all the employees. All workers are covered under SOCSO scheme as stated in their contract agreement. Payment of SOCSO is done at HQ level. The contributions of SOCSO by both employer and employee (local) can be seen in the employees' pay slips.	Complied
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Records on Lost Time Accident (LTA) metrics displayed at the operating units through Safety Statistic Billboard. The display has the information about number of days without incident, incident category, number of incidents, and date of updating.	Complied



Criterion / Indicator Assessment Findings Compliance Principle 7: Protect, conserve and enhance ecosystems and the environment **Criterion 7.1:** Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques. (C) IPM plans are implemented and monitored to ensure An IPM plan is implemented and available in the "Pelan Pengurusan Kawalan Complied 7.1.1 effective pest control. Serangan Makhluk Perosak Tanaman Bersepadu (IPM)" for the year 2020. - Critical (Major) compliance -There are no species under the Global Invasive Database and CABI.org within Not Applicable Species referenced in the Global Invasive Species Database 7.1.2 the estate and mill premises. and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -There was no evidence that fire was used for pest control. 7.1.3 There is no use of fire for pest control unless in exceptional Complied circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment. (C) Justification of all pesticides used is demonstrated. Pesticide used are justified and recorded in the Chemical Register in accordance 7.2.1 Complied Selective products and application methods that are specific to USECHH Regulation 5. The register was last updated on 22/10/2020. to the target pest, weed or disease are prioritised. - Critical (Major) compliance -Records of pesticides use were documented in "Rekod Racun 5 tahun & 7.2.2 (C) Records of pesticides use (including active ingredients Complied Pengiraan a.i/hektar & a.i/tan BTS". Among the information available in the used and their LD50, area treated, amount of active records was active ingredients (a,i,), treated area size, number of applications, ingredients applied per ha and number of applications) are a.i./Ha, and a.i./mt FFB. provided. - Critical (Major) compliance -

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Criterio	on / Indicator	Assessment Findings	Compliance
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -	At the point of assessment, paraquat was no longer in use. The elimination is in- line with the estate's IPM plan.	Complied
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	The management encourage establishing biological control as per IPM plan. No prophylactic type of pesticide used in the estate. The implementation in the field is consistent with the MLSL.	Complied
7.2.5	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.	Paraquat was eliminated. Alternatives such as Glyphosate and glufosinate ammonium were used with the elimination of Paraquat. Based on the latest chemical register only class III & IV chemical used at FGVPM Keratong 11 Estate.	Complied
	The due diligence refers to:a) Judgment of the threat and verify why this is a major threat		
	b) Why there is no other alternative which can be usedc) Which process was applied to verify why there is no other less hazardous alternative		
	 d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. - Minor compliance - 		
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always	Pesticides were handled, used or applied by trained workers applied in accordance to the product label. Appropriate safety and application equipment	Complied

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Criterie	on / Indicator	Assessment Findings	Compliance
	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. - Critical (Major) compliance -	were provided and used. Samples of chemical safety data sheet (SDS) were checked during site visit. All precautions attached to the products (SDS, notice board etc) were properly observed, applied, and understood by workers based on the interview.	
7.2.7	 (C) Storage of all pesticides is in accordance with recognised best practices. - Critical (Major) compliance - 	The estate continues to ensure all new and requiring balance of remaining solution to be kept under lock and key. During the visit, it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.	Complied
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	Pesticide containers are reused as premixed chemical containers and the excess are disposed through recycle wastes vendors after triple-rinsed procedure has been undergone.	Complied
7.2.9	 (C) 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. Critical (Major) compliance - 	Aerial spraying of pesticides is not practiced by the estate.	Not Applicable
7.2.10	 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance - 	FGVPM Keratong 11 Estate Medical surveillance was last done on 12-13/11/2019 for employees involved in pesticides handling such as spraying operators, field supervisors and store clerk by an OHD [DOSH Reg. No. JKKP HQ/08/DOC/00/545]. Based on the medical surveillance report [ref. no.: 111/OHD/2020], all the employees had passed the tests and declared fit.	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
7.2.11	(C) 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. - Critical (Major) compliance -	There was no evidence that persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions were undertaking work with pesticides.	Complied
Criterio	7.3: Waste is reduced, recycled, reused and disposed of in a	an environmentally and socially responsible manner.	
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance -	FGV Palm Industries Sdn. Bhd (FGVPISB) and FGV Plantation (Malaysia) Sdn. Bhd. (FGVPMSB) has established SOP Waste Management, No Documents ML- 1A/L2-Pr19(0) dated 1 st June 2019	Complied
		<u>FGVPISB Keratong 3 Palm Oil Mill</u> The Palm Oil Mill have prepared The Waste Management Plan (WMP) for 2020. The WMP has been incorporated in "Pengenalpastian Sumber & Jenis Bahan Buangan"	
		Sample of Waste Management Plan (WMP) for FGVPISB Keratong 3 Palm Oil Mill as per outline below;	
		A. Source of waste: Palm Oil Mill Operation	
		B. Type of schedule waste: Spend oil / Oil filter	
		C. Impact: Contamination to water, air and soil	

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Criterion / Indicator	Assessment Findings	Compliance
	D. Waste Management Plan (3R): Collect and dispose to authorize contractor	
	FGVPMSB Keratong <u>11 Estate</u> The estate has prepared The Waste Management Plan (WMP) for 2020. The WMP has been incorporated in "Pengenalpastian Sumber & Jenis Bahan Buangan".	
	Sample of Waste Management Plan (WMP) for FGVPMSB Keratong 11 Estate as per outline below;	
	A. Source: Estate operation	
	B. Type of schedule waste: Empty pesticide container	
	C. Impact: Water, Air and Land Pollution	
	D. Schedule waste plan (3R):	
	Reused to fill water (Spraying Use)Collected, tripe rinse and sold to registered Contractors.	

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Criterion / Indicator		Assessment Findings					Compliance
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	Bhd.		P Labelling, Hand) and FGV Plantation ling, Storage, Transfer ed 1 st June 2019.		Complied
		The copera	make labelling,				
		(M) S waste by th Waste	dn. Bhd dated 30th is centrally in the pl e Department of E	October 2019 for antation sector of invironment, Puti	onment, Putrajaya to I Application for collecti f FGV. The request has rajaya for "To establis onditions subject to	on of scheduled been approved h a Centralised	
		to ha	• •		l act as a "Generator" Department of Environ		
		Sighte		dule waste for F	GVPISB Keratong 3 P	alm Oil Mill as	
		No	Type of schedule waste	Month Disposed	Quantity Disposed		
		1	SW 305	Oct 2020	0.64		
		2	SW 410	Oct 2020	0.22		

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Criterio	on / Indicator	Asse	ssment Findings				Compliance
Criterio	>n / Indicator	Sighte No 1 2 3 Prope during as fol	ed record of schedule Type of schedule waste SW 305 SW 306 SW 409 er disposal of waste g muster ground brie lows;	Month Deliver to Centralize SW center 26.11.2020 26.11.2020 26.11.2020 material, according fing for Internal sta	Quantity Disposed - MT 0.028 0.014 0.071 to procedures h akeholder during	as been briefed	Compliance
		27 th N	lovember 2020 – Brie was sess worl Ven uly 2020 – Briefing or and non-s attended	te and non-scheduk ion was attended b kers ue: Muster call area	e waste material. y 46 Palm Oil Mill at Palm Oil Mill scheduled waste erial. The session		
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -		Holding Berhad has e onmental impacts. Th				Non- compliance

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Criterio	on / Indicator	Assessment Findings	Compliance
		FGVPMSB Keratong 11 Estate There is no issue of burning of wastes observed in the FGVPMSB Keratong 11 Estate and the company has encouraged the workforce not to do any open burning or use fire for waste disposal. FGVPISB Keratong 3 Palm Oil Mill Non-compliance (Minor) The management for scheduled wastes and non-scheduled wastes was not implemented and effectively monitored. During the site visit to the staff housing complex at Block H and Class F14, the auditors found the followings lapses: 1) Disposal of domestic wastes using fire 2) Empty lubricant containers, empty chemical container, empty paint container, empty mineral water bottles and spillage of engine oil was seen at the residential area.	
Criterio	7.4: Practices maintain soil fertility at, or where possible imp	prove soil fertility to, a level that ensures optimal and sustained yield.	
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	Management of soil fertility is guided by FGV's " <i>Manual Ladang Sawit Lestarl</i> " (Oil Palm Plantation Sustainability Manual), Third Edition (2017), Section V: Manuring. It covers the applications of fertiliser for various stages of palm age and techniques. Recommendation of type of fertilisers and dosage is given by the agronomy unit through analysis of foliar and soil.	Complied
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.	Leaf and soil analysis were done on 29/7/2020 [ref.: FRF20210451 and FRS20210443] to monitor the changes in soil fertility and plant health as well as to generate the Manuring Recommendation 2021.	Complied



Criterion / Indicator Assessment Findings Compliance - Minor compliance -Application of EFB was in place as part of the nutrient recycling strategy. Records Complied 7.4.3 A nutrient recycling strategy is in place, which includes the of mulching was recorded in "Buku Rekod Tandan Kosong" (EFB Record Book) recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent where information such as quantity of EFB and Field number is available. (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -Straight, compound and mix fertilizer are used at the estate. Progress of fertiliser Complied 7.4.4 Records of fertiliser inputs are maintained. application is recorded in "Buku Rekod Kerja Penaburan Baja" (Manuring Records - Minor compliance -Book). Based on sampled records, the progress of manuring was in line with the programme. Criterion 7.5: Practices minimise and control erosion and degradation of soils. 7.5.1 (C) Maps identifying marginal and fragile soils, including Maps indicating the types of soil and steep terrain were available for verification. Complied steep terrain, are available. The maps were produced by FGVPMSB's Land Management Unit, Corporate Department. Among the major soils identified to be present in the estate are - Critical (Major) compliance -Renggam series, Bungor lateritic, Local alluvium, and colluvium to name a few. Based on terrain maps, there are a few scattered patches of area identified to be more than 25-degree slope. There is no replanting done by the estate since the last assessment. Replanting 7.5.2 No replanting on steep slopes (above 25 degrees) unless Not Applicable is planned to be carried out in 2021. 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. Minor compliance -No New planting within the estate since 15 Nov 2019. 7.5.3 There is no new planting of oil palm on steep terrain. Not Applicable - Minor compliance -



Criterion / Indicator Assessment Findings Compliance Criterion 7.6: 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. Soil maps were available at FGVPM Keratong 11 Estate. Based on the maps, (C) To demonstrate the long-term suitability of land for palm Complied 7.6.1 100% of the soil at the estate is of mineral type. There is no soil categorized as oil cultivation, soil maps or soil surveys identifying marginal fragile or marginal. and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -Not applicable as there are no marginal or fragile soils within the estate as Not Applicable Extensive planting on marginal and fragile soils, is avoided, 7.6.2 indicated in the soil map. or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -Not applicable as there are no marginal or fragile soils within the estate as 7.6.3 Soil surveys and topographic information guide the planning Not Applicable indicated in the soil map. of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly. Not applicable as there is no planting on peat soil within the estate. Not Applicable 7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -Not applicable as there is no planting on peat soil within the estate. Areas of peat within the managed areas are inventoried, Not Applicable 7.7.2 documented and reported (effective from 15 November 2018) to RSPO Secretariat. **PROCEDURAL NOTE:**



Criterio	on / Indicator	Assessment Findings	Compliance
	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). - Minor compliance -		
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.- Critical (Major) compliance -	Not applicable as there is no planting on peat soil within the estate.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place.- Critical (Major) compliance -	Not applicable as there is no planting on peat soil within the estate.	Not Applicable
7.7.5	(C) 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. This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. - Critical (Major) compliance -	Not applicable as there is no planting on peat soil within the estate.	Not Applicable



Criteri	on / Indicator	Assessment Findings	Compliance
7.7.6	 (C) 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. Critical (Major) compliance - 	Not applicable as there is no planting on peat soil within the estate.	Not Applicable
7.7.7	(C) 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.	Not applicable as there is no planting on peat soil within the estate.	Not Applicable
Criteri	on 7.8: Practices maintain the quality and availability of surface	e and groundwater.	
7.8.1	 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: a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water. Minor compliance - 	FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 Estate has established SOP Water Management Plan. Sighted Water Management Plan established by FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 Estate for the year 2020. The plan consists of the management of quality and availability of water which inclusive of identifying the source of water used, the efficiency of water usage, identifying of renewable water source and impact to the water catchment area and stakeholders as well as an action plan of water shortage in employee's housing area. Implementation can be seen with the availability of records on the monitoring of water usage, monitoring of rainfall and water shortage contingency plan.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	The management plan and implementation as below;	
	The management plan and implementation as below,	
	FGVPISB Keratong 3 Palm Oil Mill	
	Source of water: Palm Oil Mill Effluent	
	Location: Palm Oil Mill	
	Impact: Water pollution caused by Effluent release to the river	
	Root Cause:	
	i. Effluent pool operation does not follow SOP	
	ii. Quality of effluent released over the permissible limit	
	iii. Effluent pond broke	
	Action Plan:	
	i. Ensuring effluent pool operation according to SOP	
	ii. Pool sample analysis and weekly effluent release	
	iii. Close monitoring of effluent pond	
	Source of water: Government water (PAIP)	
	Location: Residental and office area	
	Impact: Interception of water supply	
	Root Cause:	
	i. Maintenance work by a government agency caused the pipe to	
	leak	
	ii. The dry season causes the interruption of water supply	
	Action Plan:	
	i. Report breakage of water supply to nearby Water Department	
	ii. Provide sufficient water storage tanks	
	iii. Request from the Water Department to send water supply	

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Criterio	on / Indicator	Assessment Findings	Compliance
		trucks to the residential area	
		Sighted result from the water sampling from the final discharge to Keratong river. The frequency of sampling is on weekly basis. The criteria for the test were pH, BOD, COD, TS, SS, OG, AN and TN.	
		<u>FGVPMSB Keratong 11 Estate</u> Source of water: Field Drain/reservoir Impact: Flood/shortage of water in the dry season / affects the frond arrange caused by the drifted by water Root Cause: Shallow river, destructions of water flowing	
		 Action Plan : i. carry out the desalting of drains in the estate and remove all the rubbish ii. Installation of a culvert iii. Frond arrangement away from the drain iv. Construct the iron bridge 	
		7.8.1a – Domestic consumption for FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 Estate supplied from Pengurusan Air Pahang (PAIP)	
		7.8.1b – FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 Estate has established good piping infrastructure to ensure all workers received adequate treated and clean water from the water treatment plan.	
7.8.2	(C) 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	FGVPMSB Keratong 11 Estate FGV Plantation (Malaysia) Sdn. Bhd. has established SOP Identification of slope and river reserve areas dated 1 st June 2016.	Complied

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Criteri	on / Indicator	Asses	sment	: Findings				Compliance
	 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. Critical (Major) compliance - 	approp FGVPM manag compa	Sighted action was taken by the FGVPMSB Keratong 11 Estate to restore with an appropriate riparian zone with proper signage along the waterway at the FGVPMSB Keratong 11 Estate based on the RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). According to company standards, the marking of riparian is with blue and white color paint. It was confirmed during the site visit field.					
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -	The Pa tertiary of disc BOD3, of Envi Sighted Lab refe Date ref	FGVPISB Keratong 3 Palm Oil Mill The Palm Oil Mill applies the biological system with an anaerobic lagoon and tertiary plant (membrane plant) in series for its treatment of effluent. The quality of discharged effluent was analyzed every week and the parameters are pH, BOD3, COD, TS, SS, OG, AN and TN. Based on the quarterly report to the Department of Environment, generally, the Palm Oil Mill has complied with the regulated limit. Sighted latest Palm Oil Mill effluent analysis dated 17 th November 2020 as below; Lab reference : 9042/2020 Date received: 17 th November 2020 Date report release : 23 rd November 2020					
		Kesuit :	No 1 2 3 4 5	Analysis pH BOD COD TS SS	Result 8.24 65 545 2608 290	Parameter as per Department of Environment 1974 (Act 127) 5 – 9 100 max N/A N/A 400 max		

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Criteri	on / Indicator	Assessment Findings							Compliance
		6	;	OG	2		5 max		
		7	,	AN	44	1	150 max		
		8	;	TN	57	2	200 max		
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Result at th with Jadua – 30 th June FGVPISB Water for river was Keratong a flowmet	he final al Pema e 2021. Kerato r FFB 3 Paln ter and of usad h ry h h	discharge atuhan issu ong <u>3 Palm</u> processing ping into n Oil Mill f d recordec	is accordii ed by Dep a Oil Mill g was sc a water or FFB p l in "Sun IT FFB fo sage 00 00 00 00 00 00 00 00 00 00 00 00 00	ng to Akta Kualiti partment of Envi purced from Ke r holding ponc processing. The nmary of Consu	200 max i Alam Sekitar 1974 ironmental, valid from eratong River. We d plant and used consumption Water/Me as per tabulated be Usage water MT per FFB 1.40 1.46 1.27 0.96 0.92 0.9	om 1 st July 2020 Vater from the d by FGVPISB s measured by T FFB".	Complied

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Criterio	on / Indicator	Assessment	t Finding	IS				Compliance
		date water co	date water consumption was recorded to be 0.99 Liter/MT FFB.					
Criterio	on 7.9: Efficiency of fossil fuel use and the use of renewable en	nergy is optimi	ised					
Criterio 7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	The FGVPISE consistently information a FGVPISE Kern Monthly reco documented. Record for Di M Jan Fet M J J M G G G G G G G G G G G G G G G G	B Kerator monitored about effice ratong 3 P ords of e . It is mo	d their fossil fuel cient consumptio r <u>alm Oil Mill</u> mergy consumpt	consumption a n. ion for non-ren nize the use of	Diesel per FFB 0.44 0.68 0.33 0.35 0.35 0.37 0.22 0.39 0.35 0.36	get and	Complied
						uture improvement.	To-	
			onsumptio	on was recorded	to be 0.36 Liter/			

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Criterion / Indicator	Asses	Assessment Findings							
		Sighted the action plan prepared by FGVPISB Keratong 3 Palm Oil Mill for improving the efficiency of use of fossil fuel as below;							
	No	Non-renewable Energy		Action Pla	an				
	1	Diesel	diesel i		consumption of Mill compared to				
			Using t the ger		ce diesel fuel for				
			Conduc	ct training for res	ponsible officers				
	Month docum	<u>FGVPMSB Keratong 11 Estate</u> Monthly records of energy consumption for non-renewable was kept and documented. It is monitored to optimize the use of non-renewable energy. Record for Diesel consumption for 2020 as tabulated below;							
	M	onth Diesel	Usage	FFB Achievement	Diesel per FFB				
	Jar	nuary 3,38	31.00	457.26	7.39				
	Feb	oruary 2,86	53.00	554.34	5.16				
	M	arch 2,84	6.00	559.84	5.08				

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Criterion / Indicator	Assess	sment Findings					Compliance
	A	pril 2,40	5.00	824.46	2.92		
	Μ	1ay 2,28	2.00	894.71	2.55		
	Ju	une 3,16	8.00	1,065.94	2.97		
	J	uly 3,10	6.00	1,141.72	2.72		
	A	Nug 3,50	0.00	1,154.22	3.03		
	S	ept 3,12	7.00	1,059.08	2.95		
	C	Oct 3,41	7.00	987.88	3.46		
	N	lov 2,92	0.00	860.78	3.39		
	D	Dec		-			
	Gran	d Total 33,02	15.00	9,560.23	3.45		
	Data is being compiled for comparison and control for future improvement. To- date diesel consumption was recorded to be 3.45 Liter/MT FFB.Sighted the action plan prepared by FGVPMSB Keratong 11 Estate for improving the efficiency of use of fossil fuel as below;NoNon-renewable Energy						
	1	Diesel	consum Field to	, reduce and ption during FFE o Palm Oil M on of farm veh	3 delivery from 1ill and daily		

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Criterion / Indicator			Assessment Findings				
Criterio	n 7.10: Plans to reduce pollution and emissions, including g	reenhou	use gases (GHG), a	Switch off the engine while waiting for the turn while transporting / sending fruit from the Palm Oil Mill to the factory Using solar power to replace diesel fuel for generator sets Conduct training for responsible officers are developed, implemented and monitored and new	developments are		
	 (C) 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. Critical (Major) compliance - 	Monito which record Identi been o and d polluta conve and c each o the ca	eenhouse gases (GHG), are developed, implemented and monitored and new de Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator which is submitted to the RSPO Secretariat. Based on the verification of various records, the data in the RSPO PalmGHG Calculator was correct. Identification of significant pollutants and greenhouse gas (GHG) emissions has been done e.g. POME, diesel/fuel and fertilizer. Their usage has been recorded and documented at each of the operating units. Identification of significant pollutants and greenhouse gas (GHG) emissions has been done e.g. Land conversion, Emissions from Fertilizer, Emissions from peat, Fuel Consumption, and crop sequestration. Their usage has been recorded and documented at each of the operating units. Approved GHG calculator, Palm GHG was used for the calculation during the implementation period. Summary Emission record year 2019 for FGVPMSB Keratong 11 Estate and				

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Criterion / Indicator	Assessment Findings	Compliance
	1. CPO – 0.82 tCOe2 / tProduct	
	2. PK – 0.82 tCOe2 / tProduct	
	3. Electricity – 0.01 tCOe2 / FFB	
	4. Land Conversion – 0.38 tCOe2 / FFB	
	5. CO2 Emissions from Fertiliser – 0.02 tCOe2 / FFB	
	6. N2O Emissions from Fertiliser – 0.02 tCOe2 / FFB	
	7. Fuel Consumption – 0.01 tCOe2 / FFB	
	FGVPMSB and FGVPISB has established a Reduction plan for pollution and monitoring effect of Green House Gases (GHG) for the year 2020.	
	FGVPISB Keratong 3 Palm Oil Mill	
	Management Plan to reduce and monitoring of GHG for FGVPISB Keratong 3	
	Palm Oil Mill as below;	
	1. Diesel consumption	
	- Monitor and record the consumption of diesel in the Palm Oil	
	Mill compared to the previous year and must be below	
	1liter/mt	
	2. Discharge of effluent	
	- The BOD monitoring Effluent release out of from Palm Oil Mill	
	(land irrigation) does not exceed the limit set by the	
	Department of Environment (not exceeding 100ppm)	
	3. Penggunaan Air	

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Criterion / Indicator	Assessment Findings	Compliance
	- Monitoring of water at Palm Oil Mill is under 1.2 MT/FFB	
	process	
	4. Pelepasan asap hitam boiler- Controlling the release stage of black smoke from boilers under	
	2 Riggleman charts every day on average	
	<u>FGVPMSB Keratong 11 Estate</u> Management Plan to reduce and monitoring of GHG for FGVPMSB Keratong 11 Estate as below;	
	 Penggunaa Diesel Monitor, reduce and record diesel consumption during FFB 	
	delivery from the estate to Palm Oil Mill and daily movement	
	vehicle in the Palm Oil Mill Conduct training for responsible	
	officers	
	2. Usage of Chemical during spraying- Monitor and reduce the consumption of chemical in the estate	
	activity (herbicide, pesticide)	
	- Training programs for staff, workers and stakeholders	
	3. Usage of Chemical during fertilizer application	

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Criterion / Indicator	Assessment Findings	Compliance
	- Increasing the use of organic materials or compost as a	
	fertilizer material	
	- Plan to a reduction of the use of fertilizer kg/palm/year	
	 4. Domestic waste Monitor domestic waste intake from residential areas to	
	- Domestic waste is allowed to dispose of at the landfill. Bo	ottle
	paper, glass, iron and aluminium can be treat as a recycle	
	waste items.	
	- Monitor the condition of the landfill so that landfill	
	management runs well. No open burning is allow	
	5. Increase awareness of recycling- Reducing the use of paper in the officials	
	- Maintain the record of waste materials delivery to the rec	cycled
	centers (Cans, Plastics, Iron, Paper, Aluminium)	
	- To conduct training for staff and the community surround	ding
	about recycling.	
7.10.2 (C) Starting 2014, the carbon s development area and major potent		unit. Not Applicable



Criterion / Indicator Assessment Findings Compliance 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). - Critical (Major) compliance -7.10.3 (C) Other significant pollutants are identified and plans to Refer to indicator 7.10.1 Complied reduce or minimise them implemented and monitored. - Critical (Major) compliance -**Criterion 7.11:** Fire is not used for preparing land and is prevented in the managed area FGVPMSB Keratong 11 Estate (C) Land for new planting or replanting is not prepared by Complied 7.11.1 Open burning concerning new planting, re-planting or other development is not burning. allowed and this was communicated to the employees and stakeholders. - Critical (Major) compliance -No controlled burning being sought by the FGVPMSB Keratong 11 Estate. During the replanting process, the old palm to be felled, chipped and shredded and the remains will be pulverized and left in the field for self-decomposed. Based on the site visit at the immature areas PR18D – Block 1 and Block 2 no evidence of open burning carry out during replanting at the FGVPMSB Keratong 11 Estate. FGV Holding Berhad has established Environmental Stewardship on managing 7.11.2 The unit of certification establishes fire prevention and Complied environmental impacts. The Policy was signed by the Chairman, dated 29th May control measures for the areas directly managed by the unit 2019. of certification. - Minor compliance -

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Criterio	n / Indicator	Assessment Findings	Compliance
		 The element covered under the environmental policy are: i. Efficient use of natural resources ii. Managing Environmental Impacts iii. No Deforestation and planting on peat iv. High Biodiversity Value (HBV) & High Conservation Value (HCV) 	
		 v. Use of Agrochemical vi. No open burning / Use of fire vii. Water Management viii. Waste Management ix. Addressing climate change 	
		Apart from having a zero-burning policy at the corporate level, contractors who are engaged to carry out the preparation of land for replanting are also required not to use fire throughout the task through an enforceable contract agreement.	
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	<u>FGVPMSB Keratong 11 Estate</u> Adjacent stakeholders were approached through a stakeholder consultation meeting and given information about the zero burning policy.	Complied
		Sighted Memo issue from FGVPMSB Keratong 11 Estate to surrounding estate stakeholder about Information on control plans and preventing fire to stakeholders dated 23rd October 2020 – The memo addresses the issue about the restriction of open burning by any individual, estates or agencies at residential area, estate area and Palm Oil Mill area.	
	n 7.12: Land clearing does not cause deforestation or damag rest. HCVs and HCS forests in the managed area are identified	e any area required to protect or enhance High Conservation Values (HCVs) or Hig and protected or enhanced.	gh Carbon Stock
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance	Not applicable since there is no land clearing after November 2005.	Not Applicable

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Criterio	on / Indicator	Assessment Findings	Compliance
	 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. Critical (Major) compliance - 		
7.12.2	 (C) HCVs, HCS forests and other conservation areas are identified as follows: a) 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. b) 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. 	<u>FGVPISB Keratong 3 Palm Oil Mill</u> Sighted In-House High Conservation Value (HCV) Assessment carried out for FGVPISB Keratong 3 Palm Oil Mill on 9 th May 2019 by In-House HCV Assessor i.e. Mr. Amir Hamzah bin Dollah @ Abdullah (Leader) HCV 1 – 2, Mr. Barath Munasamy (Members) HCV 5 – and Mr. Yaslam bin Mohammad Salleh (members) HCV 3 - 4. Based on the assessment report, there was no HCV identified in the FGVPISB Keratong 3 Palm Oil Mill. "Kajian Identifikasi HCV Penyelidikan" FGVPISB Keratong 3 Palm Oil Mill. The study covers the HCV 1-6 allotted area of concern and the mapping /GIS specialist input.	Complied
	 PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance - 	 HCV 1 – There are no significant concentrations of HCV 1 species (RTE or endemic), or which contains habitat critical to the survival of these species in the area of interest. HCV 2 - The Palm Oil Mill had developed with oil palm and there was no large landscape ecosystem (more than 50,000ha) HCV 3 – There is no RTE ecosystem and habitat in the Palm Oil Mill. HCV 4 - There are no rivers in the Palm Oil Mill or any area which serves as basic ecosystem services in critical situations. HCV 5 – There was no natural sites or resources in the Palm Oil Mill that local communities are dependent on. 	

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Criterion / Indicator	Assessment Findings	Compliance
	6. HCV 6 - There are no custom ceremonies or rituals, which require a cultural, religious, or sacred site, being practiced by locals.	
	<u>FGVPMSB Keratong 11 Estate</u> Sighted In-House High Conservation Value (HCV) Assessment carried out for FGVPMSB Keratong 11 Estate updated on 27 th December 2017 by In-House HCV Assessor i.e. Mr. Amir Hamzah bin Dollah @ Abdullah (Leader). Based on the assessment report, there was no HCV identified in the FGVPMSB Keratong 11 Estate.	
	Kajian Identifikasi HCV FGVPMSB Keratong 11 Estate. The study covers the HCV 1-6 allotted area of concern and the mapping /GIS specialist input.	
	 HCV 1 – There is no significant concentrations of HCV 1 species (RTE or endemic), or which contains habitat critical to the survival of these species in the area of interest. HCV 2 - The estate had developed with oil palm and there was no large landscape ecosystem (more than 50,000ha) HCV 3 – There is no RTE ecosystem and habitat in the estate. HCV 4 - There are no rivers in the estate or any area which serves as basic ecosystem services in critical situations. HCV 5 – There was no natural sites or resources in the estate that local communities are dependent on. HCV 6 - There are no custom ceremonies or rituals, which require a cultural, religious, or sacred site, being practiced by locals. 	
	Based on the report mentioned in Indicator 7.12.2, there is no HCV or RTE presence at FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 Estate.	

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Criterio	on / Indicator	Assessment Findings	Compliance
		Nonetheless, since the FGVPMSB Keratong 11 Estate is located next to FR Lesong, there is a potential for the encroachment of wildlife. The management plan is still addressed in "Pelan Pengurusan biodiversity Ladang FGVPMSB Keratong 11 Estate (2017-2022)".	
7.12.3	Indicator is not applicable in Malaysia context	NA	Not Applicable
7.12.4	 (C) 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). Critical (Major) compliance - 	FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 EstateBased on the report mentioned in Indicator 7.12.2, there is no HCV or RTEpresence at FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 Estate.Nonetheless, since the FGVPMSB Keratong 11 Estate is located next to FRLesong, there is a potential for the encroachment of wildlife. The managementplan is still addressed in "Pelan Pengurusan biodiversity Ladang FGVPMSBKeratong 11 Estate (2017-2022)". The FGVPMSB Keratong 11 Estate hasidentified hotspot No. 1, No.2, No.3 and No. 4 existing in the surrounding estate.Monitoring of the presence of wildlife is carried out by the staff from time to time.Description of hotspot found as follows "Hotspot No. 1 – Boundary areaHotspot No. 2 – Buffer zone / WaterwayHotspot No. 3 – ForestHotspot No. 4 – Unproductive area	Complied
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.	<u>FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 Estate</u> Based on the report mentioned in Indicator 7.12.2, there is no HCV or RTE presence at FGVPMSB Keratong 11 Estate and FGVPISB Keratong 3 Palm Oil Mill.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	- Minor compliance -		
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 -	<u>FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 Estate</u> Based on the report mentioned in Indicator 7.12.2, there is no HCV or RTE presence at FGVPMSB Keratong 11 Estate and FGVPISB Keratong 3 Palm Oil Mill. Nonetheless, employees are educated through morning briefing and signage about the restriction of hunting wildlife.	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 -	FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 Estate Based on the report mentioned in Indicator 7.12.2, there is no HCV or RTE presence at FGVPISB Keratong 3 Palm Oil Mill and FGVPMSB Keratong 11 Estate. Nonetheless, since the FGVPMSB Keratong 11 Estate is located next to FR Lesong, there is a potential for the encroachment of wildlife. The management plan is still addressed in "Pelan Pengurusan biodiversity Ladang FGVPMSB Keratong 11 Estate (2017-2022)".	Complied
7.12.8	(C) 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. - Critical (Major) compliance -	Not applicable since there is no land clearing after November 2005.	Not Applicable



Appendix B: Approved Time Bound Plan

Supply Bases (estates, plantations, associations))
Palm Oil Mill	FFB Supplier	Certification Year	Certification Standard	Status
KS SELANCAR 2B	FGVPM Selancar 06	2017	MYNI 2014	Certified
NS SELANCAR ZD	FGVPM Selancar 08	2017	MYNI 2014	Certineu
	FGVPM Selancar 09	2017	MYNI 2014	
	FGVPM Aring 02	2017	MYNI 2014	
	FGVPM Aring 15	2017	MYNI 2014	
	FGVPM Aring 03	2017	MYNI 2014	
	FGVPM Aring 04	2017	MYNI 2014	
KS ARING A	FGVPM Aring 05	2017	MYNI 2014	Certified
	FGVPM Aring 06	2017	MYNI 2014	
	FGVPM Aring 08	2017	MYNI 2014	
	FGVPM Aring 10	2017	MYNI 2014	
	FGVPM Aring 11	2017	MYNI 2014	
	FGVPM Selendang 3	2018	MYNI 2014	
	FGVPM Selendang 4	2018	MYNI 2014	Certified
KS SELENDANG	FGVPM Selendang 5	2018	MYNI 2014	
	FGVPM Berabong 1	2018	MYNI 2014	
	FGVPM Bukit Sagu 04	2017	MYNI 2014	
	FGVPM Bukit Sagu 6	2017	MYNI 2014	
KS BUKIT SAGU	FGVPM Bukit Sagu 07	2017	MYNI 2014	Certified
	FGVPM Bukit Sagu 08	2017	MYNI 2014	
	FGVPM Bera Selatan 05	2017	MYNI 2014	
	FGVPM Bera Selatan 07	2017	MYNI 2014	
KS KERATONG 9	FGVPM Merchong	2017	MYNI 2014	Certified
	FGVPM Keratong Timur	2017	MYNI 2014	
	FASSB Merchong	2017	MYNI 2014	
	FGVPM Lepar Utara 07	2017	MYNI 2014	
	FGVPM Lepar Utara 08	2017	MYNI 2014	
KS LEPAR UTARA 6	FGVPM Lepar Utara 09	2017	MYNI 2014	Certified
	FGVPM Lepar Utara 11	2017	MYNI 2014	
	FGVPM Moakil 06	2018	MYNI 2014	
ks moakil	FGVPM Moakil 07	2018	MYNI 2014	Certified
	FGVPM Mengkarak 1	2018	MYNI 2014	
ks kemasul	FGVPM Mengkarak 2	2018	MYNI 2014	Certified
	FVGPM Krau 2	2018	MYNI 2014	<u> </u>
ks krau	FVGPM Krau 4	2018	MYNI 2014	Certified
	FGVPM Lepar Hilir 05	2010	MYNI 2014	
ks lepar hilir	FGVPM Lepar Hilir 06	2017	MYNI 2014 MYNI 2014	Certified

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	FGVPM Lepar Hilir 08	2017	MYNI 2014	
	FGVPM Triang 2	2017	MYNI 2014	
KS TRIANG	FGVPM Triang Selatan 1	2017	MYNI 2014	Certified
	FGVPM Triang 4	2017	MYNI 2014	
	FGVPM Kechau 06	2017	MYNI 2014	
	FGVPM Kechau 08	2017	MYNI 2014	
	FGVPM Kechau 09	2017	MYNI 2014	
	FGVPM Kechau 10	2017	MYNI 2014	
	FGVPM Kechau 02	2017	MYNI 2014	
KS KECHAU B	FGVPM Kechau 03	2017	MYNI 2014	Certified
	FGVPM Kechau 07	2017	MYNI 2014	
	FGVPM Kechau 11	2017	MYNI 2014	
	FGVPM Chegar Perah 2	2017	MYNI 2014	
	FGVPM Telang 01	2017	MYNI 2014	
	FASSB Telang	2017	MYNI 2014	
	FGVPM Palong Timur 4/5	2018	MYNI 2014	
KS PALONG TIMUR	FGVPM Palong Timur 06	2018	MYNI 2014	Certified
	FGVPM Besout 06	2018	MYNI 2014	
BESOUT	FGVPM Besout 07	2018	MYNI 2014	Certified
KS NERAM	FGVPM Cherul 03	2018	MYNI 2014	Certified
	FGVPM Terapai 1	2018	MYNI 2014	Contified
KS CHINI 3	FGVPM Chini Timur 4	2018	MYNI 2014	Certified
KS CHIKU	FGVPM Ciku 4	2018	MYNI 2014	Certified
KS CHIKU	FGVPM Ciku 8	2018	MYNI 2014	Certified
KS KERATONG 2	FGVP Bera Selatan 03	2018	MYNI 2014	Certified
	FGVPM Palong 17	2018	MYNI 2014	Re-
KS SERTING	FGVPM Palong 18	2018	MYNI 2014	Certified
KJ JEKTING	FGVPM Palong 21	2018	MYNI 2014	(External
	FGVPM Serting Hilir 8	2018	MYNI 2014	Audit)
KS KERATONG 3	FGVPM Keratong 11	2018	MYNI 2014	Certified
KS KERTEH	FASSB Kerteh	2018	MYNI 2014	Contified
N3 NERTER	FGVPM Semaring 01	2018	MYNI 2014	Certified
KS KOTA GELANGGI	FASSB PPPTR	2018	MYNI 2014	Certified
KS KUTA GELANGGI	FASSB K.GELANGGI 5/6	2018	MYNI 2014	Certified
KS JENGKA 21	FASSB Jengka 24/25	2018	MYNI 2014	Certified
KS PENGGELI	FGVPM Inas Selatan	2018	MYNI 2014	Certified
	FASSB Ulu Belitong	2018	MYNI 2014	Contified
KS BELITONG	FGVPM Bukit Tongkat B	2018	MYNI 2014	Certified
KS KULAI	FASSB Bkt Besar/Taib Andak	2018	MYNI 2014	Certified
KS ADELA	FGVPM Kledang 2	2018	MYNI 2014	Certified
	FGVPM Tembangau 03	2018	MYNI 2014	
KS SERTING HILIR	FGVPM Tembangau 05	2018	MYNI 2014	
	FGVPM Tembangau 06	2018	MYNI 2014	Certified
	FGVPM Tembangau 07	2018	MYNI 2014	
	FGVPM Tembangau 08	2018	MYNI 2014	

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	FGVPM Tembangau 09	2018	MYNI 2014	
	FGVPM Serting Hilir 9	2018	MYNI 2014	
	FASSB Serting Hilir	2018	MYNI 2014	
KS BUKIT KEPAYANG	FGVPM Terapai 3	2018	MYNI 2014	Certified
	FGVPM Rantau abang 1	2018	MYNI 2014	
KS JERANGAU BARU	FGVPM Rantau abang 2	2021	MYNI 2014	Certified
	FGVPM Chador 1	2018	MYNI 2014	
	FGVPM Tenggaroh 9	2018	MYNI 2014	
KS TENGGAROH	FGVPM Tenggaroh 11	2018	MYNI 2014	Certified
-	FGVPM Tenggaroh 13	2018	MYNI 2014	
KS NITAR	FGVPM Nitar Timur	2018	MYNI 2014	Certified
KS CHALOK	FGVPM Setiu 1	2018	MYNI 2014	Certified
KS WA HA	FGVPM BUKIT APING	2018	MYNI 2014	Certified
	SELATAN			Certified
ks kalabakan	FGVPM Kalabakan Utara 01	TBC	MYNI 2014	External
	FGVPM Kalabakan Selatan	TBC	MYNI 2014	Audit
	FGVPM Sahabat 23	TBC	MYNI 2014	
	FGVPM Sahabat 24	TBC	MYNI 2014	-
	FGVPM Sahabat 26	TBC	MYNI 2014	-
	FGVPM Sahabat 28	TBC	MYNI 2014	External Audit
KS HAMPARAN BADAI	FGVPM Sahabat 31	TBC	MYNI 2014	
	FGVPM Sahabat 33	TBC	MYNI 2014	
	FGVPM Sahabat 34	TBC	MYNI 2014	
	FGVPM Sahabat 25	TBC	MYNI 2014	
	FGVPM Sahabat 22	TBC	MYNI 2014	
	FASSB Tambisan	TBC	MYNI 2014	
KS UMAS	FGVPM Umas 05	TBC	MYNI 2014	External
	FGVPM Umas 06	TBC	MYNI 2014	Audit
	Pontian Fico	TBC	MYNI 2014	-
	Pontian Subok	TBC	MYNI 2014	-
	Pontian Orico	TBC	MYNI 2014	
KS PONTIAN FICO	Pontian Pendirosa	TBC	MYNI 2014	External
	Pontian Kuril	TBC	MYNI 2014	Audit
	Pontian Hillco	TBC	MYNI 2014	-
	Pontian Korosah	TBC	MYNI 2014	-
	Blossom Plantation Sdn. Bhd	TBC	MYNI 2014	
KS TEMENTI	FGVPM Bera Selatan 1	TBC TBC	MYNI 2014	External Audit
	FGVPM Bera Selatan 4		MYNI 2014	Auuit
	FGVPM Sampadi 01	TBC	MYNI 2014	
	FGVPM Sampadi 03	TBC	MYNI 2014	Internal
ks sampadi	FGVPM Sampadi 04	TBC	MYNI 2014	Audit
	FGVPM Sampadi 05	TBC	MYNI 2014	-
	FGVPM Sampadi 06	TBC	MYNI 2014	
KS KEMBARA SAKTI	FGVPM Sahabat 30	TBC	MYNI 2014	Internal
	FGVPM Sahabat 35	TBC	MYNI 2014	Audit

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FGVPM Sahabat 41 TBC MYNI 2014 FGVPM Sahabat 42 TBC MYNI 2014 FGVPM Sahabat 43 TBC MYNI 2014 FGVPM Sahabat 50 TBC MYNI 2014 FGVPM Sahabat 50 TBC MYNI 2014 FGVPM Sahabat 51 TBC MYNI 2014 FGVPM Sahabat 52 TBC MYNI 2014 FGVPM Sahabat 53 TBC MYNI 2014 FGVPM Sahabat 54 TBC MYNI 2014 FGVPM Sahabat 53 TBC MYNI 2014 FGVPM Sahabat 54 TBC MYNI 2014 FGVPM Sahabat 66 TBC MYNI 2014 FGVPM Sahabat 48 TBC MYNI 2014 FGVPM Sahabat 36 TBC MYNI 2014 FGVPM Sahabat 36 TBC MYNI 2014 FGVPM Sahabat 39 TBC MYNI 2014 FGVPM Sahabat 39 TBC MYNI 2014 FGVPM Sahabat 11 TBC MYNI 2014 FGVPM Sahabat 12 TBC MYNI 2014 FGVPM Sahabat 11 TBC MYNI 2014 FGV	l	FGVPM Sahabat 40	ТВС	MYNI 2014	
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Processing Sri Mosta 1 2021 Group Cert Audit					Internal
	Processing	•		•	Audit
				,	1
Sri Mosta 3 2021 Group Cert					
Cepat Ringgit A 2021 Group Cert					
Cepat Ringgit B 2021 Group Cert					

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	Cepat Ringgit D	2021	Group Cert	
	Karamuak	2021	Group Cert	
	Sg Milian	2021	Group Cert	
	Sg Imbak	2021	Group Cert	
	Kuamut	2021	Group Cert	
PT CITRA NIAGA PERKASA	ТВА	2021	INA-NIWG	Internal Audit
PT TEMILIA AGRO ABADI	ТВА	2021	INA-NIWG	Internal Audit
FGV estate without mills	ТВА	2021	MYNI 2014	Internal Audit
Estate under RaCP	ТВА	2021	MYNI 2018	Internal Audit

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2019 for FGVPISB Keratong 3 Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. 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 data 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 FGVPISB Keratong 3 Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
СРО	0.82
РК	0.82

Extraction	%
OER	20.86
KER	5.18

Production	t/yr
FFB Process	260,930.00
CPO Produced	54,436.22
PKO Produced	13,503.48

Land Use		На
OP Planted Area		984.24
OP Planted on peat		0
Conservation (forested)		0
Conservation (non-forested)		0
	Total	984.24

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO₂e	tCO₂ e / FFB	tCO₂e	tCO2 e / FFB	tCO₂e	tCO₂ e / FFB	tCO2e	tCO₂ e / FFB
Emission								
Land Conversion	4116.38	0.38	-	-	-	-	4116.38	0.38
CO ₂ Emission from fertilizer	270.24	0.02	-	-	-	-	270.24	0.02
NO ₂ Emission from peat	0	0	-	-	-	-	0	0
NO ₂ Emission from fertilizer	228.90	0.02	-	-	-	-	228.90	0.02
Fuel Consumption	128.48	0.01	-	-	-	-	128.48	0.01
Peat Oxidation	0	0	-	-	-	-	0	0
Sink	Sink							
Crop Sequestration	-3901.78	-0.36	-	-	-	-		

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Conservation Sequestration	0	0	-	-	-	-		
Total	842.22	0.08	-	-	72519.69	-	73361.91	0.43

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0	0
Fuel Consumption	269.42	0
Grid Electricity Utilization	2788.58	0.01
Credit		
Export of Grid Electricity	0	0
Sales of PKS	-20,421.30	-0.08
Sales of EFB	0	0
Total	-17,336.29	-0.07

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO2e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

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

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

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Appendix D: Supply Chain Declaration

	A. Monthly Records of Certified and Uncertified FFB Received since the last audit (Dec 2019 - Nov 2020)					
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)		
1	Dec-19	827.77	15,846.08	16,673.85		
2	Jan-20	457.26	8,970.13	9,427.39		
3	Feb-20	315.02	10,559.94	10,874.96		
4	Mar-20	559.84	18,363.08	18,922.92		
5	Apr-20	824.46	22,398.52	23,222.98		
6	May-20	894.71	19,185.06	20,079.77		
7	Jun-20	1,065.94	22,449.33	23,515.27		
8	Jul-20	1,141.72	23,561.96	24,703.68		
9	Aug-20	1,154.22	25,778.54	26,932.76		
10	Sep-20	983.91	25,659.58	26,643.49		
11	Oct-20	987.88	27,803.41	28,791.29		
12	Nov-20	860.78	19,243.07	20,103.85		
	Total	10,073.51	239,818.70	249,892.21		

B. M	B. Monthly Records of Certified CPO & PK since the last audit (Dec 2019 - Nov 2020)				
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)		
1	Dec-19	166.35	37.86		
2	Jan-20	95.16	22.94		
3	Feb-20	58.19	15.12		
4	Mar-20	123.34	32.72		
5	Apr-20	164.17	57.68		
6	May-20	179.05	40.68		
7	Jun-20	213.01	54.00		
8	Jul-20	223.11	54.03		
9	Aug-20	232.90	54.06		
10	Sep-20	200.51	47.81		
11	Oct-20	216.92	54.24		
12	Nov-20	137.60	30.82		



Total	2,010.31	501.96

C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any) (Dec 2019 - Nov 2020)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Undisclosed buyer 1	-	-	333.33
		·	Total	333.33

	D. Records of CPO & PK Sold under other schemes since the last audit (if any) (Dec 2019 - Nov 2020)			
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	Nil			

E. Records of CPO & PK Sold as conventional since the last audit (if any) (Dec 2019 - Nov 2020)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
	Undisclosed buyer 2	2,010.31	168.63
	Total	2,010.31	168.63

	F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any) (Dec 2019 - Nov 2020)		
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil		



Appendix E: Location Map of Certification Unit and Supply bases

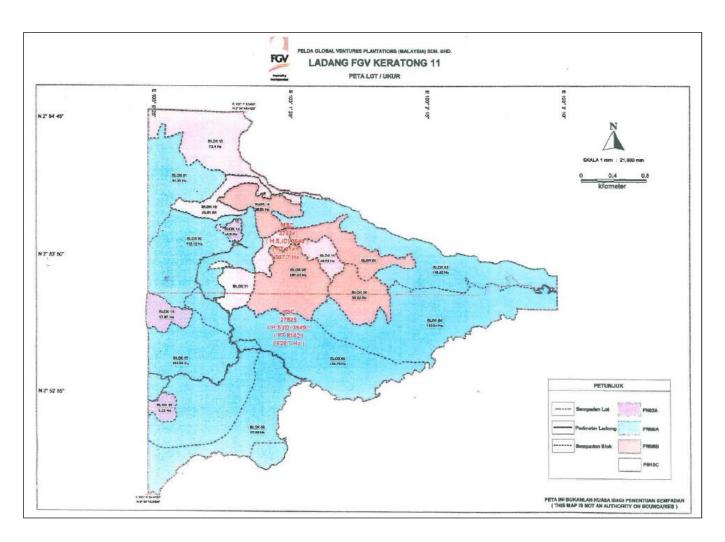
FGVPISB Keratong 3 Palm Oil Mill





Appendix F: Estate Field Map

FGVPM Keratong 11 Estate Field Map





Appendix G: List of Smallholder Sampled

Not applicable as no smallholders included in the certification.

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Appendix H: List of Abbreviations

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