

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (4)
- Recertification Assessment (Choose an item.)
- Extension of Scope

<b>Client Company name (Parent Company): Genting Plantations Berhad</b>
Client company Address: 10th Floor, Wisma Genting Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
Certification Unit: <b>Genting Oil Mills (Sabah) Sdn. Bhd - Genting Tanjung Oil Mill</b>
Location of Certification Unit: Mile 97, Sandakan-Lahad Datu Road Tenegang, Jalan Jeroco 90200 Kinabatangan Sabah, Malaysia
Date of Final Report: 9/7/2021

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**Section 1: Scope of the Certification Assessment**

1. Company Details			
<b>Parent Company</b>	Genting Plantations Berhad		
<b>RSPO Membership Number</b>	1-0086-06-000-00	<b>Membership Approval Date</b>	14/11/2006
<b>Address</b>	10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Genting Oil Mills (Sabah) Sdn. Bhd - Genting Tanjung Oil Mill		
<b>Location / Address</b>	Mile 97, Sandakan-Lahad Datu Road, Tenegang, Jalan Jeroco 90200 Kinabatangan, Sabah, Malaysia		
<b>Website</b>	<a href="http://www.gentingplantations.com">http://www.gentingplantations.com</a>		
<b>Management Representative</b>	Mr. Arunan Kandasamy (Senior Vice President – Plantation Division) Mr. Choo Huan Boon (Senior Vice President - Processing (Malaysia) & Downstream Manuf, Processing)	<b>E-mail</b>	<a href="mailto:arunan.kandasamy@genting.com">arunan.kandasamy@genting.com</a> <a href="mailto:huanboon.choo@genting.com">huanboon.choo@genting.com</a>
<b>Telephone</b>	03 2333 6510 (Head Office) 011-26855931 (GTOM Mill Manager)	<b>Facsimile</b>	03 2333 6575

2. Certification Information			
<b>Certificate Number</b>	<b>RSPO 652320</b>	<b>Date of First Certification</b>	11/01/2017
		<b>Certificate Start Date</b>	11/01/2017
		<b>Certificate Expiry Date</b>	10/01/2022
<b>Scope of Certification</b>	Palm oil and Palm Kernel Production		
<b>Visit Objectives</b>	To conduct an annual surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organisation's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.		
<b>Assessment Cycle</b>	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.)		

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	<input checked="" type="checkbox"/> Annual Surveillance Assessment (RA Choose an item. ; ASA 4) <input type="checkbox"/> Scope Extension
<b>Applicable Standards</b>	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> <i>Malaysia</i> National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019
<b>Supply Chain Module</b>	<input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
ISCC-PLUS-CERT-60183796	ISCC	ASG Cert	12/01/2020
MSPO 680512	MSPO Part 4	BSI Services (M) Sdn Bhd	08/08/2023
MSPO 692777	MSPO Part 3	BSI Services (M) Sdn Bhd	08/08/2023
MSPO 716640	MSPO SCCS	BSI Services (M) Sdn Bhd	06/10/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Genting Tanjung Oil Mill	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road 90200 Kinabatangan, Sabah, Malaysia	5° 25' 22.80" N	118° 16' 23.90" E
Genting Tanjung Estate (GTJE)	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road 90200 Kinabatangan, Sabah, Malaysia	5° 26' 33.41" N	118° 10' 10.23" E
Genting Tenegang Estate (GTGE)	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road 90200 Kinabatangan, Sabah, Malaysia	5° 20' 46.02" N	118° 13' 32.20" E
Genting Landworthy Estate (GLWE)	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road 90200 Kinabatangan, Sabah, Malaysia	5° 25' 13.40" N	118° 18' 24.60" E
Genting Layang Estate (GLYE)	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road 90200 Kinabatangan, Sabah, Malaysia	5° 25' 21.90" N	118° 14' 3.35" E
Genting Bahagia Estate (GBGE)	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road 90200 Kinabatangan, Sabah, Malaysia	5° 21' 49.50" N	118° 16' 33.70" E

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<b>5. Description of Supply Base</b>					
<b>Estate</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Genting Tanjung Estate	3,973.66	234.96	257.65	4466.27	89
Genting Tenegang Estate	3,420.28	29.75	202.51	3652.54	94
Genting Landworthy Estate	3,695.66	9.87	333.47	4039.00	92
Genting Layang Estate	1,817.80	179.92	79.69	2077.41	88
Genting Bahagia Estate	4,029.42	44.54	353.08	4427.04	91
<b>Total</b>	<b>16,936.82</b>	<b>499.04</b>	<b>1,226.40</b>	<b>18,662.26</b>	

*\*Planted reduced due resurvey during replanting*

<b>6. Plantings &amp; Cycle</b>							
<b>Estate</b>	<b>Age (Years)</b>					<b>Mature**</b>	<b>Immature</b>
	<b>0 - 3</b>	<b>4 - 10</b>	<b>11 - 20</b>	<b>21 - 25</b>	<b>26 - 30</b>		
Genting Tanjung Estate	1,049.06	272.90	198.28	0	2,453.42	2,924.60	1,049.06
Genting Tenegang Estate	994.56	423.44	265.08	0	1,737.20	2,425.72	994.56
Genting Landworthy Estate	618.41	0	0	182.38	2,894.87	3,077.25	618.41
Genting Layang Estate	88.80	180.95	979.83	568.22	0	1,729.00	88.80
Genting Bahagia Estate	1,394.67	0	0	0	2,634.75	2,634.75	1,394.67
<b>Total (ha)</b>	<b>4,145.50</b>	<b>877.29</b>	<b>1,443.19</b>	<b>750.60</b>	<b>9,720.24</b>	<b>12,791.32</b>	<b>4,145.50</b>

**Note:**  
\*\*Only Mature area is considered as production area

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<b>7. Certified Tonnage of FFB (Own Certified Scope)</b>				
Estate	Tonnage / year			
	Estimated (Jan – Dec 2020)	Actual (Nov 19 - Feb 21)		Forecast (Jan 21 – Dec 21)
		<i>Previous license period (Nov - Dec 19)</i>	<i>Current license period (Jan 20 – Feb 21)</i>	
Genting Tanjung Estate	65,552.00	9,942.69	63,238.53	48,050.00
Genting Tenegang Estate	50,999.00	9,417.57	60,146.87	48,690.00
Genting Landworthy Estate	73,658.00	12,571.82	71,375.41	60,670.00
Genting Layang Estate	39,436.00	6,405.91	40,214.92	40,130.00
Genting Bahagia Estate	71,657.00	9,510.74	62,751.61	53,440.00
<b>Total</b>	<b>301,302</b>	<b>345,576.07</b>		<b>250,980</b>

<b>8. Certified Tonnage of FFB (from other certified unit(s))</b>				
Estate	Tonnage / year			
	Estimated (Jan – Dec 2020)	Actual (Nov 19 - Feb 21)		Forecast (Jan 21 – Dec 21)
		<i>Previous license period (Nov - Dec 19)</i>	<i>Current license period (Jan 20 – Feb 21)</i>	
	N/A			N/A
N/A				
<b>Total</b>				

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
Independent FFB Supplier	Tonnage / year			
	Estimated (Jan – Dec 2020)	Actual (Nov 19 - Feb 21)		Forecast (Jan 21 – Dec 21)
		<i>Previous license period (Nov - Dec 19)</i>	<i>Current license period (Jan 20 – Feb 21)</i>	
Nil				
3 <sup>rd</sup> party FFB supplier	N/A	11,879.75	70,884.38	N/A
<b>Total</b>	N/A	82,764.13		N/A

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10. Certified Tonnage					
Mill Capacity: 60 MT/hr  SCC Model: MB	Estimated (Jan – Dec 20)		Actual (Nov 19 - Feb 21)		Forecast (Jan 21 – Dec 21)
	FFB		FFB		FFB
	301,302.00 Extension of volume (20,000)		<i>Previous license period (Nov - Dec 19)</i>	<i>Current license period (Jan 20 – Feb 21)</i>	250,980.00
			47,848.73	297,727.34	
	<b>321,302</b>		<b>345,576.07</b>		
	<b>CPO (OER: 21.18 %)</b>		<b>CPO (OER: 20.07 %)</b>		<b>CPO (OER: 21 %)</b>
	63,815.76 Extension of volume (12,100)		9,848.855	59,507.59	52,705.80
	<b>75,915.76</b>		<b>69,356.45</b>		
	<b>PK (KER: 5.3 %)</b>		<b>PK (KER: 4.89 %)</b>		<b>PK (KER: 5.17 %)</b>
	15,969.01 Extension of volume (6,900)		2,232.90	14,664.92	15,975.67
<b>22,869.01</b>		<b>16,897.82</b>			

11. Actual Sold Volume (CPO)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	1,286.05	49,497.42	0	578.55	51,362.02
Previous License period					
<b>CPO (MT)</b>	1,513.65	7,871.58	0	379.62	9,764.85
	2,799.70	57,369.00	0	958.17	61,126.87

12. Actual Sold Volume (PK)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>PK (MT)</b>	12,808.26	0	0	1,523.16	14,331.42
Previous License period					



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<b>PK (MT)</b>	1,874.71	0	0	279.62	2,154.33
	14,682.97	0	0	1,802.78	16,485.75

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

## Section 2: Assessment Process

### Certification Body:

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

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

Due to the COVID-19 Pandemic, RSPO has allowed onsite assessment to be postponed up to 6 months from the license expiry. The postponement follows the regular 3 months license extension and additional 3 months precondition extension. In order to allow the onsite to be postponed for additional 3 months from the regular extension, a certificate holder shall undergo a successful remote audit. The remote audit is not an audit replacement but it is part of the annual on-site audit. The remote audits mandays is 30% of the total contracture mandays.

**Total No. of Mandays for remote audit:** 3 man days

**Total No. of Mandays remaining for onsite audit:** 6 man days

The remote audit was conducted on **18<sup>th</sup> November 2020**. The audit programme is included in section 2.3 below. Prior to the remote audit, Information Security Measures was agreed with Client on **16<sup>th</sup> November 2020**.

The audit approach is to assess documentation conformance of the mill and supply base as an RSPO Certification Unit. The documentation assessed are as per the indicators determined by the RSPO Secretariat announcement on Coronavirus Outbreak – RSPO P&C On-site & Remote Audits dated 24<sup>th</sup> March 2020.

The onsite audit was carried out on **23-24<sup>th</sup> March 2021** to complete the remaining mandays.

Due to the COVID-19 pandemic, the Critical NC close out off-site assessment was conducted on **27<sup>th</sup> May 2021**. The audit programs are included in 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 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 2018 for the Production of Sustainable Palm Oil (**RSPO P&C MYNI 2019**) 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.

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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**

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Initial)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Genting Tanjung POM	√	√	√	√	√
Genting Tanjung Estate	√	-	√	-	-
Genting Tenegang Estate	√	-	-	√	-
Genting Landworthy Estate	-	-	√	-	√
Genting Layang Estate	-	√	-	√	-
Genting Bahagia Estate	-	√	-	-	√

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**Tentative Date of Next Visit: November 22, 2021 - November 24, 2021**

**Total No. of Mandays:** 9 man days

**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Mohamed Zainal (remote onsite) and Hidhir Abidin and	Team Leader	He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers and stakeholders consultation.
Vijay Pakirisamy (remote onsite) and Kanna and	Team Member	He holds a bachelor's degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010. He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad. Throughout his 10 year tenure in the oil palm industry, he has been part of the operations team that implements standards within the estate such as RSPO, MSPO, ISCC and FINWATCH. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, endorsed RSPO P&C Lead Auditor Course in October 2019 and endorsed MSPO Lead Auditor Course in November 2019. During this assessment, he assessed on the aspects of Occupational, Health & Safety and estate best practises. He is fluent in Bahasa Malaysia and English languages.
Hu Ning Sing (Onsite)	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 assessed on the aspects Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare,

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		smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue and RSPO supply chain requirements. She is fluent in Bahasa Malaysia and English languages.
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**Accompanying Persons:** *Not applicable*

Name	Role

**2.3 Assessment Plan**

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

PRELIMINARY AGENDA					
Date	Time	Subjects	MH	HNS	VK
Monday 22/3/2021	PM	Audit travel to Sandakan via AK5194 (ETA 1800). Check in at Pavilion Hotel, Labuk.	√	√	√
Tuesday 23/3/2021  <b>Genting Tanjung POM &amp; Genting Bahagia Estate</b>	0630	Audit Team travelling to Genting Tenegang Complex			
	9.00 – 12.30	Opening Meeting: <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).</li> <li>Verification on previous audit findings</li> </ul> <b>Genting Tanjung POM</b> 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.	√	√	√
	12.30 - 13.30	Lunch break	√	√	√
	13.30 - 16.30	<b>Genting Bahagia Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	16.30 – 17.00	Interim Closing briefing (end of day 1)	√	√	√

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Date	Time	Subjects	MH	HNS	VK
Wednesday 24/3/2021  <b>Landworthy Estate</b>	08.30 – 13.00	<b>Genting Landworthy Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	10.30 – 12.30	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 15.30	<b>Continue with unfinished elements</b>	√	√	√
	15.30 – 16.30	Audit team discussion	√	√	√
	16.30-17.00	Closing meeting and recommendation	√	√	√
	17.00	Audit team travel back to Sandakan	√	√	√
Thursday 25/3/2021	AM	Audit team travel back to Kuala Lumpur via AK5197 (ETD 1120)	√	√	√

**Major Nc close out verification**

PRELIMINARY AGENDA			
Time	Subjects	MH	ICT planned
08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> <li>Briefing on site verification plan</li> </ul>	√	Teleconference, Skype, Webex, Telecon, Face-time and Whatsapp
09.00 – 12.30	Genting Tanjung POM and estates - Verification on previous Major NC. Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence  Closing meeting – conclusion and recommendation	√	Teleconference, Skype, Webex, Telecon, Face-time and Whatsapp

### Section 3: Assessment Findings

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

- Genting Plantations Berhad Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- (*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	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	No. The delays are due to the following factors: 1. Some estates in Indonesia are in progress to obtain their Hak Guna Usaha (HGU). 2. PT SP,KMJ, DWK is in the process of obtaining Forest Release and Forest Exchange prior to HGU application. 3. RACP in progress for Genting Kencana Estate. 4. Standalone HCSA reports are in progress to be peer reviewed. 5.NPP in progress for PT SISM, PT SMA ( additional areas) and PT KIU	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No new acquisitions as of March 2021. Expansion of land area at PT Sepanjang Inti Surya Mulia Area 199 Ha,Area 100 Ha, Area 1300 Ha. As per comment in table below, the required assessments were being conducted and in progress.	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 in the 100% certification targets, except for adjustment of dates for planned certification.	Yes
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No	Yes
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation	No	Yes

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of the plan? If yes a <b>Major</b> non-compliance shall be raised		
<b>Un-Certified Units or Holdings</b> <i>(any non-compliance against the below shall be raised as Major Non-compliance)</i>		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	<p><u>Indonesia</u></p> <ol style="list-style-type: none"> <li>1. PT SP,KMJ, DWK is in the process of obtaining Forest Release and Forest Exchange prior to HGU application.</li> <li>2. Standalone HCSA reports are in progress to be peer reviewed.</li> <li>3.NPP in progress for PT SISM, PT SMA ( additional areas) and PT KIU</li> </ol> <p><u>Malaysia</u></p> <ol style="list-style-type: none"> <li>1. RACP in progress for Genting Kencana Estate.</li> </ol>	Yes
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	<p>Yes. NPP documents are publicly available at the RSPO website.</p> <p>Registered HCSA reports Completed Peer Review Reports are published at:</p> <p><a href="http://highcarbonstock.org/registered-hcsa-assessments/">http://highcarbonstock.org/registered-hcsa-assessments/</a></p> <p>Completed Peer Reviewed HCV reports:</p> <p>PT Agro Abadi Cemerlang:  <a href="https://hcvnetwork.org/find-a-report/?acs-action=advanced-search">https://hcvnetwork.org/find-a-report/?acs-action=advanced-search</a></p> <p>PT Kharisma Inti Usaha:  <a href="https://hcvnetwork.org/find-a-report/?acs-action=advanced-search">https://hcvnetwork.org/find-a-report/?acs-action=advanced-search</a></p> <p>PT Sawit Mitra Abadi:  <a href="https://hcvnetwork.org/find-a-report/?acs-action=advanced-search">https://hcvnetwork.org/find-a-report/?acs-action=advanced-search</a></p> <p>PT Palma Agro Lestari Jaya:  <a href="https://hcvnetwork.org/find-a-report/?acs-action=advanced-search">https://hcvnetwork.org/find-a-report/?acs-action=advanced-search</a></p> <p>PT United Agro Indonesia:  <a href="https://hcvnetwork.org/find-a-report/?acs-action=advanced-search">https://hcvnetwork.org/find-a-report/?acs-action=advanced-search</a></p>	Yes
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p><i>Note:</i>  <i>The RSPO RaCP tracker shall be checked to</i></p>	<p>No reported outstanding land conflict. Refer <a href="https://askrspo.force.com/Complaint/s/casetracker">https://askrspo.force.com/Complaint/s/casetracker</a></p> <p>If there is such case, a mutually agreed process has been established</p> <p><u>Indonesian Operating Units</u></p> <p>SOP - CPD – 02-00.00</p>	Yes



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<p><i>confirm for any land conflicts/Liabilities <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>. The progress on the Liabilities shall be verified and reported. Please refer to BSI-RSPO Secretariat approval.</i></p>	<p><i>Mekanisme Penyelesaian Sengketa Lahan Malaysian Operating Unit SMP-GPB-18 Negotiation, Compensation and Handling Procedures</i></p> <p>Based on <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a> for <i>Genting Plantations Berhad</i>;</p> <p>4 management units with potential liabilities all 4 MUs have submitted the LUCA to RSPO.</p>	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 6.3.</p>	<p>No reported outstanding and reported labour disputes. If there is such case, a mutually agreed process has been established</p> <p><u>Indonesian Operating Unit</u> SOP - HRD-04-00.00 Penyelesaian Keluh Kesah</p> <p><u>Malaysian Operating Unit</u> SMP-GPB-19 Complaints and Grievances</p>	<p>Yes</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>Based on the following: <a href="https://askrspo.force.com/Complaint/s/casetracker">https://askrspo.force.com/Complaint/s/casetracker</a> No any legal non-compliance occur.</p>	<p>Yes</p>
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>Positive assurance has been made for both Indonesia and Malaysia operation.</p> <p>Positive assurance statement was made by Sustainability Manager – Sabah dated 15/2/2 for namely 3 uncertified estates (Genting Kenchana, Genting Permai and Genting Indah Estate)</p> <p>Positive assurance statement was made by Senior Sustainability Manager dated 15/2/2 for namely the uncertified estates (PT. Palma Agro Lestari Jaya, PT. Surya Agro Palma, PT. Agro Abadi Cemerlang, PT. Citra Sawit Cemerlang, PT. Globalindo Agung Lestari, PT. United Agro Indonesia, PT. Kharisma Inti Usaha, PT. Dwie Warna Karya, )</p>	<p>Yes</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>No stakeholder comments or complaints received.</p>	<p>Yes</p>

**3.3 Progress of scheme smallholders and/or outgrowers (Not applicable )**

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance

<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	<p>Not applicable</p>	
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### 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 **2 (onsite) 1 (remote)** Critical; **3** (onsite) Minor nonconformities and **0** Opportunity For Improvement raised. The **Genting Tanjung Palm Oil Mill and supply base** Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the 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			
<b>NCR Ref #</b>	1988112-202011-M1	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	2.3.1 (Critical)
<b>Date Issued</b>	18/11/20	<b>Due Date</b>	15/2/21
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/1/21
<b>Statement of Nonconformity:</b>	Evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder was not available for FFB Suppliers.		
<b>Requirement Reference:</b>	For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul>		
<b>Objective Evidence:</b>	A list of all directly sourced FFB is available. It has the information about names of the suppliers, MPOB License number, geo-location and address. So far there were 13 suppliers registered from outside the certification scope. However, the evidence to show the status of the third party FFB suppliers land ownership for example Land Application (LA), letter from Land & Survey Department, Surat Tuai Rumah/ Ketua Kampung, letter from Jabatan Kemajuan Orang Asli (JAKOA) (for Peninsular), Temporary Occupation Lease (TOL), Provisional Lease or Alienated Land was not available for verification.		
<b>Corrections:</b>	Mill will send memo to all the FFB supplier requesting them to submit their copy of		

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	land title, LA/PT and other related documents for mill filling.  Sustainability Department will make sure all document on ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder for all the FFB Supplier to Genting Tanjung Oil Mill will be available and filled in the mill office. This matter will be further verified during routine visit and in the next RSPO internal audit.
<b>Root Cause Analysis:</b>	The clause requirement on requesting supporting document on ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder was not stated in the Mill Procedure, PM-MKT-04 - Supplier Evaluation, Selection & Monitoring (Direct Material), hence, Genting Tanjung Oil Mill haven't request it from all the FFB supplier (3 <sup>rd</sup> party direct FFB supplier).
<b>Corrective Actions:</b>	The Mill procedure in managing new and existing supplier, PM-MKT-04 - Supplier Evaluation, Selection & Monitoring (Direct Material) will be amended to include in the clause requirement on evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder
<b>Assessment Conclusion:</b>	NC close out verification: SOP for PM-MKT-04 - Supplier Evaluation, Selection & Monitoring (Direct Material), dated 2 <sup>nd</sup> January 2021 rev:1 has been revised to include clause requirement on evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder. Related evidences for legality was obtained by Genting Tanjung POM for Ace Foremost and Winking Plantation Sdn Bhd. The evidences submitted were found to be suffice and effective to close the NC on 18/1/21. Continuous implementation will be further verified in the next surveillance assessment

Non-conformity			
<b>NCR Ref #</b>	2036809-202103-M1	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	7.10.3 (Critical)
<b>Date Issued</b>	24/3/21	<b>Due Date</b>	22/6/21
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	4/6/21
<b>Statement of Nonconformity:</b>	Implementation and monitoring of significant pollutants were not effectively managed.		
<b>Requirement Reference:</b>	Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored		
<b>Objective Evidence:</b>	<p>Observed during field visit at block 8 (Landworthy Estate);</p> <ul style="list-style-type: none"> <li>i) Oil/lubricant containers were placed directly on the ground which lead to soil contamination. No proper waste storage area sighted.</li> <li>ii) Environmental mitigation at skid tank was not made available to reduce risk of pollution. Soil contamination was observed at nozzle/pump area.</li> <li>iii) Secondary containment was not available for the drum filled with diesel and placed directly on the ground.</li> <li>iv) Temporary workshop shed was built near to field drain. Workshop activities carried out at the area contaminating the ground soil where there was no concrete slab to mitigate pollution.</li> </ul>		

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<b>Corrections:</b>	<p>Estate will re-brief and conduct training to the contractor management and workers on company’s Environment Policy and Procedures including Procedure of Scheduled Waste Management.</p> <p>All scheduled waste i.e contaminated soil, used lubricant containers and used lubricant oil will be stored in the estate’s scheduled waste store and recorded. The skid tank will be removed out from the estate and the area will be cleared from pollutions. The contractors will get diesel fuel through estate’s skid tank. Dedicated tray will be provide to drums that used to store and distributed diesel. The temporary workshop will not be allowed and it will be cleared. All mechanical job must be done in estate workshop</p>
<b>Root Cause Analysis:</b>	All the pollution sighted at contractor’s machinery parking area. The contractor failed to demonstrate compliance to the agreement signed with the estate, indicates that value of work of the contractor must include compliances to company’s Environment Policy and Procedures including Procedure of Scheduled Waste Management.
<b>Corrective Actions:</b>	Estate team will be monitoring the contactor activities including conducting monthly workplace inspection to avoid any recurrent polluting activities. Any new appointed contractor will be brief and provided with training on company’s Environment Policy and Management Procedures. This matter will also be monitored by sustainability department in monthly basis and in the next RSPO internal audit.
<b>Assessment Conclusion:</b>	<p>Remote Major NC close out verification:</p> <ul style="list-style-type: none"> <li>i) Briefing to the respective contractor (Generasi Beringin Sdn Bhd) was done on 31/3/2021. Records of training was verified which has covered on Genting Plantations Berhad's environmental management procedures and policies.</li> <li>ii) Contaminated soils was cleared together with other type of waste generated onsite.</li> <li>iii) Skid tank was removed from temporary site. All diesel issuance will be through estate's skid tank.</li> <li>iv) Secondary containment/tray and ERP kit provided to the contractor for distribution of diesel.</li> <li>v) No more temporary workshop placed at field area for the contractor. Only temporary shelter allowed for rest area.</li> <li>vi) Monthly inspection was carried out by OSH committee on 8/5/21 to monitor contractor activities in the estate.</li> <li>v) Monitoring on the contractor activities in the estate was discussed in the meeting Sustainability Management Team. The latest meeting minute dated 26/3/21 was verified.</li> </ul> <p>Implemented corrective action found to be adequate to close the NC effectively on 4/6/21. Continuous implementation will be further verified in the next assessment</p>

Non-conformity			
<b>NCR Ref #</b>	2036809-202103-M2	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	3.6.2 (Critical)
<b>Date Issued</b>	18/11/20	<b>Due Date</b>	22/6/21
<b>Closed</b>	Yes	<b>Date of nonconformity Closure</b>	4/6/21

<b>(Yes / No)</b>			
<b>Statement of Nonconformity:</b>	The Existing Control Measures stated in the HIRARC was not effectively implemented		
<b>Requirement Reference:</b>	The effectiveness of the H&S plan to address health and safety risks to people is monitored		
<b>Objective Evidence:</b>	<p>a) HIRARC for Shovel &amp; Tractor Driver; Record Number: SP-MGR-01-F01-0; Rev: 06; Activiti: Beroperasi dalam Kawasan Kilang; Kawalan Sedia Ada: Topi Keselamatan. It was noticed during the site visit to the ramp at the mil that the Shovel Driver was not wearing appropriate PPE (Safety Helmet).</p> <p>b) HIRAC for FFB Grading: SP-MGR-01-F01-0; Rev: 05; Activiti: FFB Grading; Mengred Buah &amp; Pungut/Sapu LF; Kawalan Sedia Ada: PPE – Kasut Keselamatan. It was noticed during the site visit to the ramp at the mill that he FFB Grader was not wearing appropriate PPE (Safety Shoe) as the worker was wearing Wellington Boots.</p>		
<b>Corrections:</b>	The work station PIC will be re-brief on monitoring of PPE usage by the mill PIC on OSH. The workers will be provided with PPE, Safety helmet and Safety Shoe and will be re-brief and re-training on the HIRARC for Shovel & Tractor driver and for FFB Grading including the PPE requirement by the mill PIC on OSH and monitored by SHO.		
<b>Root Cause Analysis:</b>	The implementation of daily monitoring of PPE usage by the work station PIC is not effective.		
<b>Corrective Actions:</b>	Briefing and training on monitoring of PPE usage by the PIC of each work station will be done once in 6 month and recorded. It is also will be included in Mill OSH training program for 2021. This matter will be further monitor by SHO on monthly basis.		
<b>Assessment Conclusion:</b>	<p>Remote Major NC close out verification:</p> <p>i) Briefing on PPE usage for FFB grading was carried out on 12/04/21. All relevant employees including APs were trained on the importance and PPE compliance while doing work at FFB grading area.</p> <p>ii) PPE issuance records were verified for the FFB grading and shovel drivers. Latest issuance for boots was recorded on 26/4/21.</p> <p>iv) HIRARC for shovel and tractor driver was last reviewed on 5/4/21 and has included control measures such as PPE and administrative control in the register.</p> <p>v) SHO report dated 19/4/21 was verified and no PPE non-compliance issue reported by SHO.</p> <p>Implemented corrective action found to be adequate to close the NC effectively on 4/6/21. Continuous implementation will be further verified in the next assessment.</p>		

Non-conformity			
<b>NCR Ref #</b>	2036809-202103-N1	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	3.3.2 (Minor)
<b>Date Issued</b>	24/3/21	<b>Due Date</b>	Next annual surveillance assessment

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<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"																
<b>Statement of Nonconformity:</b>	There was no mechanism to check consistent implementation of procedures																		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures is in place.																		
<b>Objective Evidence:</b>	<p>i) Genting Plantations Berhad has established Procedures for Social Management (Doc. No.: SMP-GPB-32, Rev. 0 dated 18/01/2018). Under Clause 6.8.2, the workers committee meetings shall be conducted at least quarterly or whenever necessary. However, document reviewed in GTOM, GBHE and GLWE found that the workers committee meeting was conducted once a year. For e.g.:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Estate</th> <th>2018</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td>GTOM</td> <td>14/08/2018</td> <td>14/09/2019</td> <td>04/09/2020</td> </tr> <tr> <td>GBGE</td> <td>26/11/2018</td> <td>24/07/2019</td> <td>17/10/2020</td> </tr> <tr> <td>GLWE</td> <td>19/10/2018</td> <td>27/09/2019</td> <td>04/02/2021</td> </tr> </tbody> </table> <p>ii) Labels must be available for all containers where chemicals are being stored. This is especially for the chemicals which have been transferred from its original packaging and there is potential for it to be kept overnight. An example is diesel containers for use at the genset and workshop. Pesticide mixtures and oils for use by the workshop team are also of no exception. If the contents are used within normal work shift, containers are to be relabel with the chemical name or the trade names written on the original label. If the contents are not used within normal work shift, then the containers shall carry the same labels to that of the original packaging. The requirements is in accordance to OSHA1994 USECHH Regulations 2000 Part VI sub-Regulation 21. During the site visit to the mill workshop, it was noticed that there were several mineral water bottles being used to store lubricants. The container used was not relabeled to identify the actual content</p>			Estate	2018	2019	2020	GTOM	14/08/2018	14/09/2019	04/09/2020	GBGE	26/11/2018	24/07/2019	17/10/2020	GLWE	19/10/2018	27/09/2019	04/02/2021
Estate	2018	2019	2020																
GTOM	14/08/2018	14/09/2019	04/09/2020																
GBGE	26/11/2018	24/07/2019	17/10/2020																
GLWE	19/10/2018	27/09/2019	04/02/2021																
<b>Corrections:</b>	<p>i) Estate and mill to prepare committee meeting schedule for the year 2021 and the schedule to be verified by Mill Manager, Estate Senior Manager and Estate Manager. The Sustainability Department will conduct checking on the schedule compliance during monthly follow up visit. ii) Mill In-charge will conduct briefing and training on labelling of reused container with accordance to OSHA1994 USECHH Regulations 2000 Part VI sub-Regulation 21 to all the mill workshop workers.</p>																		
<b>Root Cause Analysis:</b>	<p>i) Frequency of meeting for the Workers Committee (JCC) was not following the procedure requirements due to the PIC was unaware of the SOP requirements ii) The workshop workers is unaware of the Labelling of reused container because there is no training or briefing provided to them on the SOP requirement.</p>																		
<b>Corrective Actions:</b>	<p>i) Estate and Mill to schedule its Workers Committee (JCC) meeting to be the same date with OSH Committee meeting. OSH committee meeting was conducted at least once in three month as per OSHA 1994 requirements. ii) Briefing and Training on labelling of reused container will be included in the mill annual training program 2021 and to be conducted once in 6 month. Sustainability</p>																		

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	department will monitor this implementation in monthly visit and in the next RSPO internal audit.
<b>Assessment Conclusion:</b>	The corrective action is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Non-conformity			
<b>NCR Ref #</b>	2036809-202103-N2	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	6.5.3 (Minor)
<b>Date Issued</b>	24/3/21	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	No evidence of assessment of the needs of new mothers with consultation was sighted.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	There was one new mother just delivered on December 2020 in Genting Tanjung Oil Mill and one new mother delivered on September 2020 in Genting Landworthy Estate. However, no evidence of assessment of the needs of the new mothers with consultation was sighted. This has confirmed through interview with both new mothers.		
<b>Corrections:</b>	SD to conduct training/briefing to the estate and mill PIC regarding this requirement as well as to provide the documented assessment on the new mother needs. Estate and Mill plan to conduct the assessment of new mother's needs on April 2021.		
<b>Root Cause Analysis:</b>	This is new requirements as per RSPO P&C 2019 and estate/mill PIC is unaware of the requirements.		
<b>Corrective Actions:</b>	Sustainability Department will conduct proper training in future on any new certification standard requirements		
<b>Assessment Conclusion:</b>	The corrective action is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.		

Non-conformity			
<b>NCR Ref #</b>	2036809-202103-N3	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	7.2.8 (Minor)
<b>Date Issued</b>	24/3/21	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"

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<b>Statement of Nonconformity:</b>	Handling and Traceability of Empty Chemical Containers was not justified in the estate.
<b>Requirement Reference:</b>	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.
<b>Objective Evidence:</b>	Empty Chemical Containers are stored in the Scheduled Waste store temporarily before transferred to the premix area where it is triple rinsed, punctured and stored to be disposed as Recyclable Waste to the Licensed Waste Manager. Since 04/01/2020, the estate has issued a total of 198 units of empty chemical containers to date. The Empty Chemical Gallon Record shows only 77 units in the empty chemical containers inventory. The physical stock verified in the scheduled waste store and premix area was a total of 87 units. The balance empty chemical containers were not traceable. There were no records of storage or disposal of 4 liters chemical containers since the last disposal on 04/01/2020. The issuance records shown that there was a total of 78 containers used since the last disposal on 04/01/2020. There were no evidence that the chemical containers were handled responsibly.
<b>Corrections:</b>	1. The balance empty chemical containers will be trace back, triple rinse if needed, punctured, recorded and kept in the empty chemical container store. 2. The 78 of 4 liters empty chemical containers will also be trace back, triple rinse, punctured, recorded and kept in the empty chemical store. 3. The storekeeper will update all empty chemical container record and tally with physical stock available in the store and will be verified by assistant manager in-charge. Storekeeper also will be re-brief on the company procedure SOP-PD-01 by the assistant manager.
<b>Root Cause Analysis:</b>	There is lack of monitoring done by the estate management on the compliances of company procedure SOP-PD-01, Prosedur Stor dan Langkah – Langkah Pengendalian Bahan Kimia
<b>Corrective Actions:</b>	Monitoring on monthly basis will be done by Estate Assistant Manager In-charge of Estate Store through the Empty Chemical container Bin card or Log book. Sustainability Department will monitor this during follow up visit and in the next RSPO internal audit.
<b>Assessment Conclusion:</b>	The corrective action is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Good cooperation to the audit team during remote and onsite assessment.



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

Non-conformity			
<b>NCR Ref #</b>	1847887-201911-M1	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	4.7.2 (Major)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	14/1/2020
<b>Statement of Nonconformity:</b>	The hazard identification, risk rating and risk control review measures details in certain HIRARC operations was not adequately addressed.		
<b>Requirement Reference:</b>	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.		
<b>Objective Evidence:</b>	<p>Genting Tenegang Estate:            There was an (MC&gt;4 days) JKPP 6 incident dated 21/7/19 on the (Harvesting - cutting of palm fronds. However, the HIRARC for the related activity was not reviewed.</p> <p>Genting Layang Estate:            a) 1 accident case reported with MC 2 days on 10/9/19. The accident investigation been conducted and HIRARC for the related accident activity - Bodily injury due to Grass Cutting Knife been reviewed on 1/11/19. However, the HIRARC review was not fully addressed as the review on Likelihood rating as not adequately reviewed as per the risk rating matrix.            Note: Currently rated: (Likelihood x severity) – (1x2) – 1 is very unlikely.            b) HIRARC for Landfill operation was not available.            c) Modification works been carried out for the Diesel skid tank operation on the working at height. However, the HIRARC for Diesel operation did not capture on the working at height activity.</p>		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>SHO will review the OSH Manual on HIRARC, OM-GPB-07, on how and when to review or update the HIRARC and a flow chart that simplified this procedure will be produce by SHO to improve the effectiveness of this procedure.</li> <li>SHO will conduct training of requirement in OSH Manual, OM-GPB-01 to the estate management so that accident/incident/new activities/operations and First Aid cases by operating units will be reported soonest to SHO.</li> <li>SHO will issue official email or memo to ensure consistent reporting by OU on any accident; incident; new activities/operations and First Aid cases so that SHO can coordinate to do HIRARC review with the OU.</li> <li>Training and briefing on Accident Reporting and HIRARC by SHO will be implemented yearly and included in GTGE and GLYE OSH Training Plan 2020 as a monitoring plan will be further checked during the next RSPO Internal Audit in the estate.</li> </ol>		
<b>Assessment Conclusion:</b>	ASA4 verification: Based on remote audit for the mill and estate, the HIRARC was effectively		

	implemented. The HIRARC has been reviewed on a yearly basis. Where accidents have occurred, the management have once again reviewed the HIRARC for the particular job scope and amended the severity and likelihood matrix accordingly. Thus, the NCR remains closed
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Non-conformity			
<b>NCR Ref #</b>	1847887-201911-M2	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	6.8.2 (major)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	14/1/2020
<b>Statement of Nonconformity:</b>	Evidence provided that employees among migrant women workers have been discriminated against		
<b>Requirement Reference:</b>	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against.		
<b>Objective Evidence:</b>	The Agreement template Sabah OUs; Revised on 1/1/2018; for Para 16.1 Cuti Bersalin specifying "Pekerja wanita tempatan layak menerima cuti bersalin dengan elaun bersalin selama tidak kurang 60 hari (termasuk hari-hari rehat atau cuti umum yang jatuh dalam tempoh itu) setelah memenuhi syarat dan kelayakan mengikut Ordinan Buruh Sabah 2005" shown that there's discrimination against migrant women workers for the entitlement of maternity leave.		
<b>Corrective Actions:</b>	New revised workers agreement will be use for all new recruited workers for the company in Sabah. This matter will be further monitor during the next RSPO Internal Audit.		
<b>Assessment Conclusion:</b>	ASA4 verification: Verified new agreement and addendum contract for the new recruited workers. No recurrence of issue noted and the major NC is remained closed.		

Non-conformity			
<b>NCR Ref #</b>	1847887-201911-N1	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	4.7.5 (Minor)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/11/20
<b>Statement of Nonconformity:</b>	First aid case investigation process was not adequately addressed according to internal procedure requirements		
<b>Requirement Reference:</b>	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed		
<b>Objective Evidence:</b>	Genting Tenegang Estate: There were (MC<4) 4 first aid cases (minor cut due to sharpening the sickle) in		

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	<p>June 2019. However, no Accident Investigation Report was conducted as per internal procedure "Carta 1- Pemberitahuan mengenai Kemalangan dan Penyiasatan di Tempat Kerja" requirement.</p> <p>Genting Layang Estate: Chemical Storekeeper first aid kit: - Monthly first aid kit inspection record e.g. sampled for July-19 was available with details of refilled of first aid items for used up first aid items. However, the first aid case usage record was not recorded for the used up first aid items.</p> <p>Genting Tanjung POM: Admin Office First Aid Kit - First Aid cases dated 4/7/19, 17/7/19, 14/8/19, 21/8/19, 24/8/19 and 28/10/19 were recorded in the sampled First Aid Log Book at Admin Office. However, the review of first aid injury cases was not investigated and reviewed accordingly in the OSH Meeting dated 20/9/19 as per internal procedure NADOPOD (SP-MGR-06) requirement.</p>
<b>Corrective Actions:</b>	<p>GTGE: Briefing and Training on OSH Manual will be an annual program conducted by the SHO for all estate HA. This will be included in GTGE OSH Training Plan for 2020. This will be further checked during next RSPO Internal Audit.</p> <p>GLYE: A monthly First Aid Kit Inspection schedule will be produced by HA as a monitoring plan. The estate HA will monitor all the First Aid kit through the Monthly first aid kit inspection. The inspection record will be including worker's name and item issued for each month as well as refill record for each of the first aid kit. All report will be review and sign by Assistant Manager in charge and will be approve by the Estate Manager. This will be further checked during next RSPO Internal Audit.</p> <p>GTOM: All accident report including First Aid cases will be investigate and review in all OSH Meeting and will be a permanent in the list of agenda for all OSH Meeting in near future. This will be further checked during next RSPO Internal Audit.</p> <p>SHO will issue official email or memo to ensure consistent reporting by OU on any accident; incident; new activities/operations and First Aid cases</p>
<b>Assessment Conclusion:</b>	<p>ASA4 verification: During the ASA 4 Remote Audit, the Mill and Estate showed compliance towards addressing first aid cases in accordance with the internal procedures requirements. All mill and estate's HA has been continuously trained on OSH related SOPs such as First Aid, ERP and HIRARC to name a few. Monthly first aid monitoring records were available for verification. The records of first aid kit items usage was also sighted to be updated. The OSH Meeting Minutes was sighted to include accident investigation in the agenda as well. Hence, the minor NC is closed on 18/11/20.</p>

Non-conformity			
<b>NCR Ref #</b>	1847887-201911-N2	<b>Clause &amp; Category</b>	5.3.3 (Minor)

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		<b>(Critical (Major) / Minor)</b>	
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/11/20
<b>Statement of Nonconformity:</b>	The waste management and disposal plan to avoid or reduce pollution was not adequately documented and implemented.		
<b>Requirement Reference:</b>	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.		
<b>Objective Evidence:</b>	Genting Layang Estate: The waste management and disposal plan was not adequately documented and implemented for type of waste generated from demolished buildings (Old Labour Quarters - LQ1) debris which was found within housing compound area of GLYE in front of LQ2.		
<b>Corrective Actions:</b>	Training on EIA and its implementation and training for waste management plan will be conducted to the estate management. This training will be included in the estate Annual Training Plan for 2020 as monitoring plan and will be further checked during the next RSPO internal audit. Training and briefing of waste management and disposal plan for contractor will be done in case of any contractor engaged for any demolition work in the estate.		
<b>Assessment Conclusion:</b>	ASA 4 remote verification: Training related to waste management and EIA was given to the workers and contractor. For example, at Genting Landworthy Estate, scheduled waste and domestic waste training was carried out on 18/6/20 and 13/7/20. No recurrence of issue observed thus the previous minor NC is closed on 18/11/20.		

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1369435M1	Major	2.1.1	23/08/2016	Closed out on 01/09/2016
1369435M1	Major	4.7.2	23/08/2016	Closed out on 01/09/2016
1559908-201709-M1	Major	6.5.1	24/11/2017	Closed out on 19/1/2018
1559908-201709-M2	Major	6.5.2	24/11/2017	Closed out on 19/1/2018
1559908-201709-N1	Minor	5.3.3	24/11/2017	Closed out on 16/11/2018
1707465-201808-M1	Major	6.2.1	16/11/2018	Closed out on 15/02/2019
1707465-201808-M2	Major	6.7.1	16/11/2018	Closed out on 15/02/2019

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1707465-201808-N1	Minor	4.7.3	16/11/2018	Closed out on 12/11/2019
1707465-201808-N2	Minor	4.1.2	16/11/2018	Closed out on 12/11/2019
1707465-201808-N3	Minor	2.1.3	16/11/2018	Closed out on 12/11/2019
1707465-201808-N4	Minor	6.8.3	16/11/2018	Closed out on 12/11/2019
1847887-201911-M1	Major	4.7.2	14/11/2019	Closed out on 14/01/2020
1847887-201911-M2	Major	6.8.2	14/11/2019	Closed out on 14/01/2020
1847887-201911-N1	Minor	4.7.5	14/11/2019	Closed out on 18/11/2020
1847887-201911-N2	Minor	5.3.3	14/11/2019	Closed out on 18/11/2020
1988112-202011-M1	Critical	2.3.1	18/11/2020	Closed out on 18/01/2021
2036809-202103-M1	Critical	7.10.3	24/03/2021	Closed out on 4/06/2021
2036809-202103-M2	Critical	3.6.2	24/03/2021	Closed out on 4/06/2021
2036809-202103-N1	Minor	3.3.2	24/03/2021	"Open"
2036809-202103-N2	Minor	6.5.3	24/03/2021	"Open"
2036809-202103-N3	Minor	7.2.8	24/03/2021	"Open"

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

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss *Genting Tanjung Palm Oil Mill and supply base* 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.

<b>List of Stakeholders contacted</b>	
<b>Internal/External Stakeholders</b> Field/estate workers Mill workers Gender committee	<b>Union/Contractors</b> FFB supplier Contractor
<b>Government Departments</b> Humana teacher	<b>NGO</b> -

Creche attendant	
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Stakeholders comment	
<b>1</b>	<p><b>Feedbacks:</b>                      FFB Suppliers – They informed that they have signed on the <i>Polisi Perolehan Tandan Buah Sawit (TBS)</i> [External Fresh Fruit Bunch (FFB) Procurement Policy Agreement] and understood the terms in the policy. Pricing mechanism was explained to them during that time. There was no delay in payment at this moment. They understood the complaint procedure. The relationship between them and the management is good.</p> <p><b>Management Responses:</b>                      The management will continue to maintain good relationship with the suppliers.</p> <p><b>Audit Team Findings:</b>                      No further issue.</p>
<b>2</b>	<p><b>Feedbacks:</b>                      Workers’ Representatives (Male &amp; Female) – They informed that they were elected by the workers during election. There was no issue on wages and work condition from the workers. All the workers paid as per the Minimum Wage Order 2020. They also informed that all the complaints are resolved in timely manner. They were being treated equally without discrimination of gender and nationalities.</p> <p><b>Management Responses:</b>                      The management will ensure compliance of the legal requirements and treat all the workers equally.</p> <p><b>Audit Team Findings:</b>                      No other issue.</p>
<b>3</b>	<p><b>Feedbacks:</b>                      HUMANA Teacher &amp; Creche Attendants – They informed that no child has followed their parents to the field to work. Those meet the minimum age of schooling were attended classes in HUMANA and those below the age were stayed at creche during the working hours of parents.</p> <p><b>Management Responses:</b>                      The management is strictly prohibited the employment of child labour in the estate.</p> <p><b>Audit Team Findings:</b>                      No further issue.</p>

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
Not applicable as all estates has the 2 cycle of planting.					


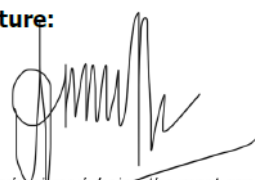
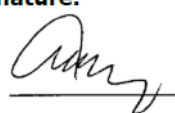

Previous land owner / user comment	
1	Feedback: N/A
	Management Response:
	Audit Team Findings:

**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.

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

Formal Signing-off of Assessment Conclusion and Recommendation		
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is deemed that the management system continues to achieve its intended outcomes. It is concluded that Genting Oil Mills (Sabah) Sdn. Bhd - Genting Tanjung Oil Mill certification unit can recommend for continued certification.</p>		
Report prepared by	Acceptance of Assessment Conclusion	Acceptance of Assessment Conclusion
<b>Name: Mohamed Hidhir Zainal Abidin</b>	<b>Name: Arunan Kandasamy</b>	<b>Name: Choo Huan Boon</b>
<b>Company Name: BSI Services (M) Sdn Bhd</b>	<b>Company Name: Genting Plantations Berhad</b>	<b>Company Name: Genting Oil Mills (Sabah) Sdn. Bhd</b>
<b>Title: Lead Auditor</b>	<b>Title: SVP – Plantation (Malaysia)</b>	<b>Title: SVP - Processing (Malaysia) &amp; Downstream Manufacturing</b>
<p><b>Signature:</b></p> 	<p><b>Signature:</b></p>  <i>(I the undersigned, being the most senior relevant management representative of the operation seeking of holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i>	<p><b>Signature:</b></p>  <i>(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.)</i>
<b>Date: 3<sup>rd</sup> July 2021</b>	<b>Date:</b>	<b>Date: 7th July 2021</b>



**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1</b>			
The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Publicly available documents sighted available which reported in respective criterions in this checklist. Policies also made publicly available that was Established as Sustainability Management Group Policies as following:</p> <ul style="list-style-type: none"> <li>• Sustainability Policy; Rev. 00; Date: 3/8/2009</li> <li>• Occupational Safety &amp; Health Policy Date: 01/7/2018</li> <li>• Environmental Policy; Rev. 00; Date: 5/10/2009</li> <li>• People Policy; Rev. 00; Date: 3/8/2009</li> <li>• Sexual Harassment Policy; Rev. 00; Date: 3/8/2009</li> <li>• Zero Burning Policy; Rev. 00; Date: 10/8/2011</li> <li>• Food Safety Policy; Rev. 00; Date: 2/2/2010</li> <li>• Whistleblower Policy; Rev. 00; Date: 4/4/2013</li> <li>• MSPO Policy; Rev. 00; Date: 18/3/2014</li> <li>• Policy on Ethical Conduct and Integrity; Rev. 00; Date: 22/6/2015</li> <li>• Social Policy (Incorporating Special Labour and Human Rights requirements); Date: 14/09/2020</li> </ul> <p>All policies were available in dual language (BM &amp; English) and signed Genting Plantations Berhad President &amp; COO.</p>	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	All the related information was in Bahasa Malaysia and English. The stakeholders could access to the documents upon request from the	Complied

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	<p>- Minor compliance -</p>	<p>operating units or access through company's website: <a href="https://www.gentingplantations.com/sustainability/">https://www.gentingplantations.com/sustainability/</a>. The stakeholders have been given a memo on the list of publicly available documents and acknowledged on the memo after received. Interviewed with FFB suppliers confirmed that they aware of the information that could be access by them and informed that the management has briefed to them.</p>	
<p>1.1.3</p>	<p><b>(C)</b> Records of requests for information and responses are maintained.          - Critical (Major) compliance -</p>	<p><u>Genting Tanjung Mill:</u>          Sustainability Management Procedure for Consultation and Communication; SMP-GPB- 17; Rev. 02; Date: 23/02/2018. Consultation &amp; communication done through meetings, dialogs, engagement to both internal &amp; external stakeholders and recorded in Genting Plantations Complaints/Grievance Record Book – Mill: GTOM. Sighted latest complaints received by external stakeholder (DOSH Sandakan branch) (ref. #058).</p> <p><u>Genting Bahagia Estate:</u>          Sustainability Management Procedure for Consultation and Communication; SMP-GPB-17; Rev. 02; Date: 23/02/2018 and Sustainability Management Procedure Manual for Complaints &amp; Grievances, Doc No: SMP-GPB-19, Rev: 03, Dated 21/03/2018 is available for complaint and grievances process available during the audit. Consultation &amp; communication and complaint/grievance process were implemented through meetings, dialogs, engagement to both internal &amp; external stakeholders and recorded in Genting Plantations Complaints/Grievance Record Book – Estate: GBGE. Sighted latest complaints received by internal stakeholder (ref. #031; dated 08/10/2020) on request to repair damage pipe at (Jiniti Pineh's house). No any external complaints/grievances received from external stakeholder.</p>	<p>Complied</p>

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		<p><u>Genting Landworthy Estate:</u>  Sustainability Management Procedure for Consultation and Communication; SMP-GPB-17; Rev. 02; Date: 23/02/2018 and Sustainability Management Procedure Manual for Complaints &amp; Grievances, Doc No: SMP-GPB-19, Rev: 03, Dated 21/03/2018 is available for complaint and grievances process available during the audit. Consultation &amp; communication and complaint/grievance process were implemented through meetings, dialogs, engagement to both internal &amp; external stakeholders and recorded in Genting Plantations Complaints/Grievance Record Book – Estate: GLWE. Sighted latest complaints received by internal stakeholder (ref. #043; dated 16/03/2020) on HUMANA housing complex don't have clean water. No any external complaints/grievances received from external stakeholder.</p> <p>Other than that, the Sustainability Management Procedure Manual (Doc No: SMP-GPB-25 Rev 00, dated 14/08/2014) for information request is kept inside the enquiry register book.</p>	
1.1.4	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.  - Critical (Major) compliance -</p>	<p>The process implemented based on Sustainability Management Procedure for Consultation and Communication; SMP-GPB-17; Rev. 02; Date: 23/02/2018. Consultation &amp; communication done through meetings, dialogs, and engagement to both internal &amp; external stakeholders. Any complaints or grievances recorded in Genting Plantations Complaints/Grievance Record Book.</p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.  - Minor compliance -</p>	<p>GTOM &amp; GLWE &amp; GBGE:  Genting Oil Mills (Sabah) Sdn. Bhd : List of stakeholders updated on 28/08/2020 (Genting Tanjung Oil Mill), 26/10/2020 (Genting Bahagia Estate) and 01/06/2020 (Genting Landworthy Estate).</p>	Complied

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		<p>This year 2020 external stakeholder meeting was planned to be held in December 2020 due to COVID 19 outbreak. The internal stakeholder meetings were conducted as below:</p> <ol style="list-style-type: none"> <li>1. GTOM: 17/11/2020 attended by 12 people.</li> <li>2. GLWE &amp; GBGE: 31/10/2020 attended by 26 representatives.</li> </ol> <p>Meetings attended by contractors, school teacher, suppliers, worker’s representative and canteen owners.</p>	
<p><b>Criterion 1.2</b> The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
<p>1.2.1</p>	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -</p>	<p>The Ethical Conduct and Integrity Policy signed by President &amp; COO dated 22/06/2015 and it was communicated to the stakeholders including contractors and third party during the stakeholder meeting on 28/07/2020 (GJBE). Other than that, contractors &amp; labour agent have signed the Addendum to Contract Agreement Contract No: GJBE/Compost/20/06/06 and Code of Business Conduct for Third Parties as below:</p> <ol style="list-style-type: none"> <li>1. GJBE: Syarikat Raihan Jaya dated 11/06/2020.</li> <li>2. GJOM: Hai Heng Enterprise Sdn Bhd daed 01/05/2019.</li> <li>3. GJOM: Magtron Electrical Engineering Sdn Bhd dated 25/09/2018.</li> </ol>	<p>Complied</p>
<p>1.2.2</p>	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -</p>	<p>Anti-Bribery &amp; Corruption Policy as well as Code of Business Conduct for Third Parties established were signed by both contractor &amp; internal employees. It is also been checked in the internal audit by Sustainability Team. Sampled sighted as in clause 1.2.1.</p>	<p>Complied</p>

<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1</b>			
There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p><b>(C)</b> The Unit of Certification complies with legal requirements                      - Critical (Major) compliance -</p>	<p>Genting Tanjung Oil Mill and supply base continues to comply with legal requirements associated with the operating units. Compliance to each applicable law and regulation is monitored by the management of each operating units and the sustainability team. License and Permits were available for verification as sampled:</p> <p><u>Genting Tanjung Oil Mill</u></p> <ol style="list-style-type: none"> <li>1. MPOB License; License Number: 500137704000; License Valid from 01.12.2019 till 30.11.2020</li> <li>2. DOE License; License Number: 003584; Valid from 01.07.2020 till 30.06.2021</li> <li>3. Air Compressor License; License Number: PMT 89280; Valid till 06.01.2021</li> </ol> <p><u>Genting Bahagia Estate</u></p> <ol style="list-style-type: none"> <li>1. MPOB License (FFB); License Number: 502249802000; Valid from 01.09.2020 till 31.08.2021</li> <li>2. MPOB License (Nursery); License Number: 608695011000; Valid from 01.03.2020 till 28.02.2021</li> <li>3. License for Storage of Controlled Items; Reference Number: S002496; Diesel (45 000 Litres) &amp; Petrol (200 Litres); Valid from 17.05.2020 till 16.05.2021</li> </ol>	Complied

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		<p>4. License for Hiring Non-Residential Workers (Sabah); License Number: JTK.H.KBN.600-4/1/01261/0376; Valid from 14.05.2020 till 13.05.2021</p> <p>5. Air Compressor License; Registration Number: PMT-SB/19 28710; Valid until 03.02.2021.</p> <p>6. Energy Commissions License; License Number: 2020/01717; Valid from 21.07.2020 till 20.07.2021</p> <p><u>Genting Landworthy Estate</u></p> <p>1. Air Compressor License; License Number: PMT-SB/19 29802; License Valid till 01.03.2021</p> <p>2. MPOB License (FFB); License Number: 503827102000; License Valid from 01.02.2020 till 31.01.2021</p> <p>3. MPOB License (Nursery); License Number: 618699011000; License valid from 01.09.2020 till 31.08.2021</p> <p>4. Worker Salary Deduction Permit; Serial Number: 600-1/2/13/9 (11/KBN/2020-0181); Valid from 29 June 2020 till 28 June 2022.</p> <p>5. Trading License; License ID: KBTG/2016/623; Valid till 31.12.2020</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Documented system including Legal Requirements Register (Doc: SMP-GPB-22; revision 08 dated March 2020) is available.</p> <p>The content of the register as below:</p> <ol style="list-style-type: none"> <li>List of local legal requirements applicable to plantation and mill operations in Malaysia and East Malaysia.</li> <li>List of international standards/requirements applicable to plantation operation in Malaysia:</li> </ol>	Complied

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		<ul style="list-style-type: none"> <li>a) Part 1: Environment</li> <li>b) Part 2: Safety and Health</li> <li>c) Part 3: Social</li> <li>d) Part 4: Best Practices and other requirements</li> <li>e) Part 5: International Standards/Requirement</li> </ul> <p>Genting Tanjung Oil Mill and the visited estates have maintained a legal Requirement Register which consist of all updated and legal requirements that are applicable to their operations and available for verification.</p>	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Genting Tanjung Oil Mill is separated through fencing around the vicinity. The effluent ponds are located at a distant from the processing area as larger space is required. The mill is located within Genting Tanjung Estate, belonging to the same parent company and of same certification unit.</p> <p>The estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers the estate visited confirmed that they were clearly marked and maintained. Besides that, the estates have also erected fences, security trenches, drains and boundary roads as demarcation of the boundary with the neighbouring area.</p>	Complied
<b>Criterion 2.2:</b>			
All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>Genting Tanjung Oil Mill and its supply base maintain list of all contracted parties. The list was available in the stakeholder list provided for verification.</p>	Complied

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<p>2.2.2</p>	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>The Memorandum Of Agreement (MOA) was available for verification for all contracted parties with the mill and estates. The MOA contains specific clause on meeting applicable legal requirements. Verified the sampled MOA as follows:</p> <p><u>Genting Tanjung Oil Mill</u></p> <ol style="list-style-type: none"> <li>1. Contractor: Chong Shu Min Trading Sdn Bhd; Agreement Number: GTOM CPO-CSM2018; Agreement Date: 16.05.2019</li> <li>2. Contractor: Landasan Kembar Sdn Bhd; Agreement Number: GTOM CPO-lk2018; Agreement Date: 01.01.2018</li> </ol> <p><u>Genting Bahagia Estate</u></p> <ol style="list-style-type: none"> <li>1. Contractor: Wong Tet Ming; Agreement Number: GBGE/20/01/01; Agreement Date: 01.01.2020; Expiry Date: 31.12.2020</li> <li>2. Contractor: Seng Vui Contractor; Agreement Number: GBGE/20/01/11; Agreement Date: 01.01.2020; Expiry Date: 31.12.2020</li> </ol> <p><u>Genting Landworthy Estate</u></p> <ol style="list-style-type: none"> <li>1. Contractor: Chong Nyuk Fah (FFB Transporter); Agreement Number: GLWE/20/01/04; Agreement Date: 01.01.2020; Expiry Date: 31.12.2020</li> </ol>	<p>Complied</p>
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		<p>2. Contractor: Adnan Khair Transport (FFB Transporter); Agreement Number: GLWE/20/01/03; Agreement Date: 01.01.2020; Expiry Date: 31.12.2020</p> <p>3. Besides that, the Genting Plantations Code of Business Conduct for Third Parties was available which includes the requirement for all 3<sup>rd</sup> parties to comply with all applicable legal requirements.</p>	
<p>2.2.3</p>	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>The Memorandum of Agreement (MOA) was available for verification for all contracted parties with the mill and estates. The MOA contains specific clause on meeting applicable legal requirements. Verified the sampled MOA as follows:</p> <p><u>Genting Tanjung Oil Mill</u></p> <p>1. Contractor: Chong Shu Min Trading Sdn Bhd; Agreement Number: GTOM CPO-CSM2018; Agreement Date: 16.05.2019</p> <p>2. Contractor: Landasan Kembar Sdn Bhd; Agreement Number: GTOM CPO-Ik2018; Agreement Date: 01.01.2018</p> <p><u>Genting Bahagia Estate</u></p> <p>1. Contractor: Wong Tet Ming; Agreement Number: GBGE/20/01/01; Agreement Date: 01.01.2020; Expiry Date: 31.12.2020</p> <p>2. Contractor: Seng Vui Contractor; Agreement Number: GBGE/20/01/11; Agreement Date: 01.01.2020; Expiry Date: 31.12.2020</p>	<p>Complied</p>

		<p><u>Genting Landworthy Estate</u></p> <ol style="list-style-type: none"> <li>Contractor: Chong Nyuk Fah (FFB Transporter); Agreement Number: GLWE/20/01/04; Agreement Date: 01.01.2020; Expiry Date: 31.12.2020</li> <li>Contractor: Adnan Khiar Transport (FFB Transporter); Agreement Number: GLWE/20/01/03; Agreement Date: 01.01.2020; Expiry Date: 31.12.2020</li> </ol>	
<p><b>Criterion 2.3:</b>  All FFB supplies from outside the unit of certification are from legal sources.</p>			
<p>2.3.1</p>	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>For all directly sourced FFB, it can be divided to FFB from Own Certification Scope and from Outside Certification Scope (Outgrowers &amp; Smallholders)</p> <ol style="list-style-type: none"> <li>Detail evidence for FFB sourced from Own Certification Scope is available in the summary report and under indicator 2.1.1 and 4.4.1.</li> <li>There are 13 FFB Suppliers (Non-Certified) from outside the certification scope. Weighbridge Tickets Tonnage is used as supporting document for claims in the mill. Sampled the following FFB Suppliers for conformity towards the indicator. <ol style="list-style-type: none"> <li>FFB Supplier: Ace Foremost; MPOB License: 503622702000; GPS Location: 5° 26' 09.6" N, 118° 16' 20.4" E</li> <li>FFB Supplier: Malbumi Estates Sdn. Bhd.; MPOB License: 502782102000; GPS Location: 5° 34' 25.08" N, 118° 21' 13.39" E</li> </ol> </li> </ol>	<p>Major Non compliance</p>

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		<p>c) FFB Suppliers: Tentu Murni Sdn Bhd; MPOB License: 509332802000; GPS Location: 5° 24' 46.24" N, 118° 14' 9.82" E</p> <p>d) FFB Suppliers: Syarikat Yu Kwang Development Sdn Bhd; MPOB License: 502054102000; GPS Location: 5° 32' 40.52" N, 118° 11' 24.39" E</p> <p>e) FFB Suppliers: Winking Plantation Sdn Bhd; MPOB License: 51316002000; GPS Location: 5.447501, 118.263348</p> <p>f) FFB Suppliers: Tenera Eco Plantation Sdn Bhd; MPOB License: 562985002000; GPS Location: 5.4523, 118.2492</p> <p>However, the evidence to show the status of the third party FFB suppliers land ownership such as Land Application (LA); letter from Land &amp; Survey Department; Surat Tuai Rumah/ Ketua Kampung; letter from Jabatan Kemajuan Orang Asli (JAKOA) (for Peninsular); Temporary Occupation Lease (TOL); Provisional Lease; Alienated Land was not available for verification. Hence a major non-conformity was raised.</p>	
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>The mill are in the midst of collecting all information as stated in indicator 2.3.1 for the indirectly sourced FFB.</p>	Complied
<p><b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b></p>			
<p><b>Criterion 3.1</b></p> <p>There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p>	<p><u>Genting Tanjung Oil Mill</u>  Genting Tanjung Oil Mill have established a management plan with 5-year projection plan (2021 to 2025). The palm oil mill budget</p>	Complied

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	- Critical (Major) compliance -	includes the projected FFB processed, CPO and PK production, OER and KER, production cost, training, insurance, environment conservation. <u>Genting Bahagia &amp; Genting Landworthy Estates</u> Estate have the management plan for FY20/21 with 5-year projection plan for (2021 to 2025) which includes on Replanting Area, Replanting Expenditure, Plant machinery, Road & Bridges and Capital Expenditures amongst others.																						
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	The replanting programs for the estates are compiled as follows. The program is reviewable on an annual basis which is subject to amendment. All figures in hectares otherwise stated. <table border="1" style="width: 100%; text-align: center;"> <thead> <tr> <th>Estate</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>GBGE</td> <td>285.32</td> <td>526.48</td> <td>548.12</td> <td>562.79</td> <td>534.48</td> <td>431.34</td> </tr> <tr> <td>GLWE</td> <td>433.44</td> <td>442.27</td> <td>441.99</td> <td>741.29</td> <td>737.91</td> <td>713.79</td> </tr> </tbody> </table>	Estate	2020	2021	2022	2023	2024	2025	GBGE	285.32	526.48	548.12	562.79	534.48	431.34	GLWE	433.44	442.27	441.99	741.29	737.91	713.79	Complied
Estate	2020	2021	2022	2023	2024	2025																		
GBGE	285.32	526.48	548.12	562.79	534.48	431.34																		
GLWE	433.44	442.27	441.99	741.29	737.91	713.79																		
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 -	Management review was conducted in the estate to address the internal audit findings among others. The management review meeting minutes was available for verification. The meeting was conducted simultaneously for the whole certification unit at the mill on 17.11.2020 chaired by the VP-Plantation.	Complied																					
<b>Criterion 3.2</b>																								
The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.																								
3.2.1	<b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -	The continuous improvement plan and the action plan to implement the plans were available for verification during the assessment.	Complied																					

		<p><u>Genting Tanjung Oil Mill</u></p> <ol style="list-style-type: none"> <li>1. Environmental Improvement Plans           <ul style="list-style-type: none"> <li>• Environmental Impacts - To improve on environmental aspects and impacts risk assessment and risk control. To receive and act on any environmental complaints through:               <ul style="list-style-type: none"> <li>○ Internal and External Communication</li> <li>○ Complaint Book.</li> </ul> </li> <li>• Waste Reduction - Maximizing recycling and minimizing waste or by-products generation.</li> <li>• Pollution &amp; Greenhouse Gas (GHG) Emissions – Pollution prevention/mitigation plan drawn up based on identified waste and pollutants. Improve condition of tractors to prevent pollution and increase safety as well as productivity.</li> </ul> </li> <li>2. Social Improvement Plans           <ul style="list-style-type: none"> <li>• To improve interior and exterior of workers quarters</li> <li>• The SIA stakeholder meeting minutes and complaint book guide will be the official guide for any execution.</li> <li>• Water Consumption and Water Quality – Clean water is scares resource. Consumption record and conformity to certain safety standard is essential.</li> </ul> </li> </ol> <p><u>Genting Bahagia Estate &amp; Genting Landworthy Estate</u></p> <ol style="list-style-type: none"> <li>1. Environmental Improvement Plans           <ul style="list-style-type: none"> <li>• Minimize use of certain pesticides - Use of alternative pesticides that are safe and less toxic. Change from Paraquat to other alternative chemicals i.e. Glyphosate, Glufosinate and, Monosodium. Briefing to staffs and executives on minimizing</li> </ul> </li> </ol>	
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		<p>pesticides and continue monitoring, avoid wastage and leakage, etc. Planting cover crops at immature fields. Strive to establish covers before planting. Increase Beneficial Plant areas. Implement Cattle Grazing at suitable areas for reducing pesticides use which in changing spraying technique from circle and path spraying to circle spraying only. Commence manual uprooting/slashing for selective weed control.</p> <ul style="list-style-type: none"> <li>• Environmental Impacts - To improve on environmental aspects and impacts risk assessment and risk control. Minimize soil erosion. Conserve HCV areas and Buffer Zones. To receive and act on any environmental complaints through:             <ul style="list-style-type: none"> <li>- Internal and External Communication</li> <li>- Complaint Book.</li> </ul> </li> <li>• Waste Reduction - Maximizing recycling and minimizing waste or by-products generation.</li> <li>• Pollution &amp; Greenhouse Gas (GHG) Emissions – Pollution prevention/mitigation plan drawn up based on identified waste and pollutants. Improve condition of tractors to prevent pollution and increase safety as well as productivity.</li> </ul> <p>2. Social Improvement Plans</p> <ul style="list-style-type: none"> <li>• To repair and maintain workers quarters – Shifting workers from wooden quarters to cement quarters continuously to adapt them to safety and health.</li> <li>• Water Consumption and Water Quality – Clean water is scares resource. Consumption record and conformity to certain safety standard is essential.</li> </ul> <p>Health &amp; Safety – To instil good Health and Safety culture in the community</p>	
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3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b></p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>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.</p> <p>- Minor Compliance -</p>	<p>The RSPO metrics template has not been issued by RSPO for reporting.</p> <p>The Annual Communication of Progress (ACOP) for 2019 was submitted to RSPO and The ACOP report for 2019 is available at the RSPO website. Link as below: -</p> <p><a href="https://document.rspo.org/Genting_Plantations_Berhad_ACOP2019.pdf">https://document.rspo.org/Genting Plantations Berhad ACOP2019.pdf</a></p>	Complied
<p><b>Criterion 3.3</b> Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>The estates and mills are guided by the following manuals:</p> <ol style="list-style-type: none"> <li>1. Genting Plantations Oil Palm Manual (OPM) issued on 09.11.1999 updated June 2013. <ul style="list-style-type: none"> <li>• Land Preparation, Nursery, Planting, Soil Conservation</li> <li>• Pest &amp; Disease, Weeding, Fertiliser Application, Harvesting</li> <li>• Managing difficult soils, Crop forecast</li> </ul> </li> <li>2. Genting Oil Mill – Safe Operating Procedure Nov 2011. <ul style="list-style-type: none"> <li>• Crane, Empty bunch hopper, Oil room, Press &amp; Digester</li> <li>• Kernel Plant, Boiler Station, Engine, Effluent Pond</li> <li>• Workshop Operations, Decanter, Dispatches</li> </ul> </li> <li>3. Sustainability Management Procedure Manual 1/8/13 revised in 07.02.2019.</li> <li>4. Environmental Control Procedure dated 15.11.2011.</li> </ol>	Complied

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		<ol style="list-style-type: none"> <li>5. OSH Manual dated 01.01.2010.</li> <li>6. System Procedure 01.08.2017</li> <li>7. Environmental Control Procedure – 01.09.2018</li> <li>8. Standard Operating Procedure Genting Sabah Estates; Rev 3 Date: Oct 2013.</li> <li>9. Covid 19 Prevention SOP; Doc Number: GENP/SOP18/03; Doc Date: 19.03.2020</li> </ol>																	
<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place..          - Minor Compliance -</p>	<p>Genting Plantations Berhad has established Procedures for Social Management (Doc. No.: SMP-GPB-32, Rev. 0 dated 18/01/2018). Under Clause 6.8.2, the workers committee meetings shall be conducted at least quarterly or whenever necessary. However, there is no mechanism to ensure the implementation of this procedure where during document reviewed in GTOM, GBHE and GLWE found that the workers committee meeting was conducted once a year. For eg:</p> <table border="1" data-bbox="1153 865 1928 1062"> <thead> <tr> <th>Estate</th> <th>2018</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td>GTOM</td> <td>14/08/2018</td> <td>14/09/2019</td> <td>04/09/2020</td> </tr> <tr> <td>GBGE</td> <td>26/11/2018</td> <td>24/07/2019</td> <td>17/10/2020</td> </tr> <tr> <td>GLWE</td> <td>19/10/2018</td> <td>27/09/2019</td> <td>04/02/2021</td> </tr> </tbody> </table> <p>Genting Plantations Sdn. Bhd. System Procedure; Doc No: Sp-MGR-08; Revision: 01; Issue Date: 1<sup>st</sup> August 2017.</p> <p><i>Labels must be available for all containers where chemicals are being stored. This is especially for the chemicals which have been transferred from its original packaging and there is potential for it to be kept overnight. If the contents are used within normal work shift, containers are to be relabel with the chemical name or the</i></p>	Estate	2018	2019	2020	GTOM	14/08/2018	14/09/2019	04/09/2020	GBGE	26/11/2018	24/07/2019	17/10/2020	GLWE	19/10/2018	27/09/2019	04/02/2021	<p>Minor non Compliance</p>
Estate	2018	2019	2020																
GTOM	14/08/2018	14/09/2019	04/09/2020																
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GLWE	19/10/2018	27/09/2019	04/02/2021																



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		<p><i>trade names written on the original label. If the contents are not used within normal work shift, then the containers shall carry the same labels to that of the original packaging.</i></p> <p>The requirements are in accordance to OSHA1994 USECHH Regulations 2000 Part VI sub-Regulation 21.</p> <p>During the site visit to the mill workshop, it was noticed that there were several mineral water bottles being used to store lubricants. The container used was not relabelled to identify the actual content. Hence a minor nonconformity was raised.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>The monitoring of the SOP implementation was implemented through all levels of the supervisory personnel with records maintained and verified.</p> <p>Among others the records are:</p> <ul style="list-style-type: none"> <li>• Daily production/work records for the core activities at the estates and mill</li> <li>• Field Costing Book</li> <li>• Monthly Chemical Consumption Record</li> <li>• Mature/immature field work program</li> <li>• Fertilizer application Records</li> <li>• Herbicide Work Program</li> <li>• Rat Baiting Census Records</li> </ul> <p>Harvesting Standard Checklist</p>	Complied
<p><b>Criterion 3.4</b></p> <p>A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected</p>	<p>The Social Impact Assessment established by Sustainability Department for each operating unit titled "Social Impact</p>	Complied

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	<p>stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>Assessment and Human Rights Impact Assessment Report dated 31 Oct 2018’.</p> <p>POM and Estates carried out the annual review of environmental impacts in term of Environmental Impact Evaluation. The last review was conducted in 1/6/19 at POM on water quality and water availability, contamination of oil and water and air pollution. The assessment covered all area and process in the mill such as FFB reception, loading ramp &amp; marshalling yard, sterilizer, threshing, pressing, clarification station, kernel plant and etc.</p> <p>Genting Layang Estate:          List of Identification of Environmental Aspect and Impact and Evaluation of Significance available dated 16/10/19. Sampled the Environmental Aspect and Impact Identification (EAI) for activities such as Herbicides Spraying, Manuring, Harvesting/Pruning, Chemical (herbicides/fertilizer) receiving and storage, Building Construction.</p> <p>Genting Tenegang Estate:          List of Identification of Environmental Aspect and Impact and Evaluation of Significance available. Sampled the Environmental Aspect and Impact Identification (EAI) for activities such as Herbicides Spraying, Manuring, Harvesting/Pruning, Chemical (herbicides/fertilizer) receiving and storage, Building Construction, Management of Housing and Other Amenities.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>The SIA were developed with the participation of workers, villagers, contractors and etc.</p> <p>Among the groups consulted were</p> <ul style="list-style-type: none"> <li>- local workers</li> <li>- foreign workers</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- workers representative</li> <li>- old, young and middle-aged workers/residence</li> <li>- contractors &amp; suppliers (Canteen Owner, Grocery)</li> <li>- neighbor estate/smallholders (Harimaju, AceForemost, Malbumi, Wingking, Hwa Li and SK Enterprise)</li> </ul> <p>The continuous implementation of the improvements activities was checked during the field and document audit. The environmental management plan has been established to monitor the identified significant activities that give impacts on environment. A specific staff and executive have been appointed to do the monitoring to ensure the plan is effectively implemented. Refer to the Environmental improvement and management plan dated 26/6/20.</p>	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The SIEA monitoring plan were developed annually with on-going and continuous plan. The social management and monitoring plan were established dated 08/07/2020 (GTOM), 16/10/2020 (GBGE) iand 29/06/2020 (GLWE) incorporated the SIA, list of stakeholders, internal stakeholder, complaints and grievances, etc.</p>	Complied
<p><b>Criterion 3.5</b> A system for managing human resources is in place.</p>			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>Genting Plantations Berhad has established the Procedural Instruction-Foreign Workers Employment, Payment and Recoverable (Doc No: GEN-13, Rev 02, issue date 09 Nov 2020). It mentions the recruitment process, recruitment agency, recruitment fee and other costs including termination and retirement in accordance with Malaysian Employment Act.</p> <p>For local workers, the sustainability management procedure manual, doc no: SMP-GPB-32 revision 00 dated 18 Jan 2018 has includes the pay and conditions, forced labour including the voluntary termination of contract, repatriation, etc.</p>	Complied

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3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>If any emergency vacancy, the operating unit will spread the job vacancy through word of mouth or through referral. Besides, the Human Resource Department in HQ will published any job vacancy in Daily Express newspaper and Jobstreet. Recruitment of foreign workers will be handle by the HR in HQ. There was one newly recruited employee in Genting Tanjung Oil Mill on October 2020 and on March 2021 in Genting Bahagia Estate. Seen the recruitment records such as application for employment form, resume, photocopied of identification card and employment contract.</p>	Complied
<p><b>Criterion 3.6</b> An occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>			
3.6.1	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p><u>Genting Tanjung Oil Mill</u></p> <ol style="list-style-type: none"> <li>1. HIRARC was available to cover all risk that had been identified in the mill. Among the HIRARC sighted was Covid 19, Office and Weighbridge, Security, FFB Grading, Loading ramp and Sterilizer Station. The latest revision of HIRARC was on 23.06.2020</li> <li>2. CHRA Report was available, conducted by Envosha Sdn Bhd (Dosh Reg No: HK 906) on 11.05.2015. The CHRA report was available during assessment. The CHRA reassessment has been planned for the year 2020 but has been delayed due to the assessor currently reprocessing their license. The communication documents with the assessor was verified. The assessor has proposed to conduct the CHRA on 24<sup>th</sup> Nov 2020.</li> <li>3. Audiometric test was conducted for 25 mill workers on</li> </ol>	Complied

		<p>02.10.2019 by DAB OH Sdn Bhd. The results concluded that all 25 workers have normal hearing with no hearing impairment. The audiometric test for the year 2020 has been delayed due to the CMCO in Sabah. Nevertheless, the audiometric test was conducted on 11.11.2019 by DAB OH Sdn Bhd. The results are yet to be obtained by the mill management.</p> <p>4. Medical Surveillance was conducted for 4 workers exposed to welding fumes and 1 worker exposed to water treatment chemicals. The workers were sent for medical surveillance on Sept 2019 by DAB OH Sdn Bhd. The results indicated there were no toxicity present in the samples. 6 workers exposed to welding fumes and chemicals were to be sent for medical surveillance for the year 2020. The medical surveillance has been delayed due to the ongoing CMCO in Sabah. Sighted the letter dated 07.10.2020 to DAB OH Sdn Bhd requesting for the medical surveillance to be conducted for the 6 workers on the 2<sup>nd</sup> week of December 2020.</p> <p><u>Genting Bahagia Estate</u></p> <p>1. HIRARC was used to asses all possible and potential risk related to the estate operations. The HIRARC was reviewed on 25.01.2019 for all operations. Among the HIRARC sighted was Workshop – Handling Tools, Water Catchment Pond, EFB Application, Barn Owl Census and Chemical Premix in 100L Container. HIRARC for Covid 19 was also available for verification date 18.03.2020.</p>	
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		<p>2. The CHRA was conducted on 27<sup>th</sup> March 2020 with the report available for verification. The CHRA action plan was available with appropriate action to be taken, PIC and timeframe.</p> <p>3. Medical Surveillance was conducted on 14 March 2020 for a total of 31 workers exposed to chemical and fumes. All workers were declared fit to work with no traces of cholinesterase or manganese in the samples.</p> <p><u>Genting Landworthy Estate</u></p> <p>1. HIRARC was used to asses all possible and potential risk related to the estate operations. The HIRARC was reviewed on 25.01.2019 for all operations. Among the HIRARC sighted was Harvesting, manuring and Spraying. HIRARC for Covid 19 was also available for verification date 18.03.2020.</p> <p>2. CHRA Report (JKKP HQ/07/ASS/00/236-2019/153) was available for verification. The CHRA assessment was conducted on 25.03.2019 – 31.10.2019 by certified JKKP Assessor. The action plan for CHRA recommendations have been implemented. The CHRA indicated that medical surveillance was not necessary as the chemical handled by the workers were not hazardous.</p>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored. - Major Compliance -</p>	<p>The effectiveness of the H&amp;S is monitored through the checklists available in the estates and mills via the Work Site Inspection. The findings of the WSI is discussed at the quarterly OSH Meetings in the estates and mill for the attention of the management and further improvements. The estate and mills also have checklist to monitor the usage of PPE. OSH Training Programme are in place to ensure regular trainings are conducted in line with the HIRARC requirement.</p>	Major Non Compliance

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		<p>Nevertheless, during the assessment at Tanjung Oil Mill, the following were observed:</p> <p>a) HIRARC for Shovel &amp; Tractor Driver; Record Number: SP-MGR-01-F01-0; Rev: 06; Activiti: Beroperasi dalam Kawasan Kilang; Kawalan Sedia Ada: Topi Keselamatan. It was noticed during the site visit to the ramp at the mil that the Shovel Driver was not wearing appropriate PPE (Safety Helmet).</p> <p>HIRAC for FFB Grading: SP-MGR-01-F01-0; Rev:05; Activiti: FFB Grading; Mengred Buah &amp; Pungut/Sapu LF; Kawalan Sedia Ada: PPE – Kasut Keselamatan. It was noticed during the site visit to the ramp at the mill that he FFB Grader was not wearing appropriate PPE (Safety Shoe) as the worker was wearing Wellington Boots.</p>					
<p><b>Criterion 3.7</b></p>							
<p>All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>							
<p>3.7.1</p>	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>A training programme has been developed and available in the Health and Safety Training Program (KKP) 2020 and Sustainability Training Program 2020. The trainings were sighted to have included Gender Specific Training and involves staffs and workers. Covid-19 training and briefings documents were also available for the mill and estates.</p>	<p>Complied</p>				
<p>3.7.2</p>	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Records of trainings were maintained by the Mill and all estates as below: -</p> <p>Genting Tanjung Oil Mill</p> <table border="1" data-bbox="1153 1327 1930 1375"> <thead> <tr> <th data-bbox="1153 1327 1691 1375">Training</th> <th data-bbox="1691 1327 1930 1375">Date</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Training	Date			<p>Complied</p>
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		Training	Date	
		Safe and Judicious use of Pesticide Training and Calibration	18.03.2019	
		Basic Life Support & First Aid Training	09.03.2020	
		Training on Tractor Safety Operations and Preventive Maintenance	04.04.2019	
		Spraying SOP and PPE Training	27.02.2020	
		Food For Palm Refresher Training	11.03.2020	
		Harvesting Operations Training	17.02.2020	
		SOP on Tractor Handling and Maintenance	01.07.2020	
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 -	Relevant personnel to supply chain implementation as defined by the OU are the personnel that involve in supply chain implementation such as Assistant Managers, QA, clerk, lab supervisor & assistant, weighbridge operators. The latest RSPO SCCS training was carried out on 19/11/20		Complied
<b>Criterion 3.8</b> Supply chain requirement for mills ( <b>note: all supply chain requirements are considered as critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle</b> )				
3.8.1	Identity Preserved Module 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	The Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. Thus, this indicator is not applicable.		Not applicable

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	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.		
3.8.2	<p>Mass Balance Module</p> <p>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&amp;C), or against the Group Certification scheme.</p>	The Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.	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.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Company has registered their mill in the PalmTrace:- Members ID – Genting Tanjung Oil Mill: RSPO_PO1000005521 Licence valid until 10-04-2021 Member category : Oil Mill	Complied
3.8.5	<p>Documented procedures</p> <p>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:</p> <ol style="list-style-type: none"> <li>a. Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b. Complete and up to date records and reports that demonstrate</li> </ol>	Supply Chain and Traceability (Mill) Procedure Manual, Doc. No. SMP-GPB- 23, Rev.11 dated September 2020 has been established to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. Besides, procedures that are relevant were developed as below: i) Incoming Inspection (Direct Material), Doc. No. PM-PRD- 04 dated 2/1/2018	Complied

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	<p>compliance with the supply chain model requirements (including training records).</p> <p>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.</p> <p>d. The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>ii) Product Identification &amp; Traceability, Doc. No. PM-PRD-01 dated 2/1/2018</p> <p>iii) Handling, Storage, Preservation and Delivery, Doc. No. PM-LAB-03 dated 2/1/2018</p>	
<p>3.8.6</p>	<p>Internal Audit</p> <p>i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>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.</p>	<p>Internal Audit Procedure, Doc. No. PM-IA-01 dated 2/1/2018 was developed and implemented in the Oil Mill. The frequency of the internal audit is not less than once a year as per the procedure. The requirements of RSPO have been addressed in the procedure. The latest management review was carried out on 16/11/2020 and combined during RSPO P&amp;C audit.</p>	<p>Complied</p>
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii. The mill shall have a mechanism in place for handling non-conforming</p>	<p>When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill. E.g. of information available in the DO is as follows:</p> <ul style="list-style-type: none"> <li>• FFB despatch advice (059981)</li> <li>• Estate’s names (Genting Layang Estate)</li> </ul>	<p>Complied</p>

	<p>FFB and/or documents.</p>	<ul style="list-style-type: none"> <li>• Date &amp; time of delivery (11/11/20)</li> <li>• Field No. (block 20, (96)</li> <li>• Vehicle no. (SS95/9F)</li> <li>• Net weight (11.18 kg)</li> </ul> <p>In estate's consignment note, details of RPPO certificate number available for verification. RSPO cert. no. (RSPO 652320)</p>	
<p>3.8.8</p>	<p><b>Sales and Goods Out</b></p> <p>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):</p> <ol style="list-style-type: none"> <li>a. The name and address of the buyer;</li> <li>b. The name and address of the seller;</li> <li>c. The loading or shipment / delivery date;</li> <li>d. The date on which the documents were issued;</li> <li>e. RSPO certificate number;</li> <li>f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g. The quantity of the products delivered;</li> <li>h. Any related transport documentation;</li> <li>i. A unique identification number.</li> </ol>	<p>Genting Tanjung POM ensured the required information is available in document form as below:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/ delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• Crude Palm Oil (CPO) RSPO IP</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number:</li> <li>• Available in a few forms e.g. DN no., seal no.</li> </ul> <p>Sample the weighbridge ticket/dispatch note as below:  A) CSPO  Weighbridge ticket: CPOMB19000148W  Buyer: CONFIDENTIAL  Address: CONFIDENTIAL  Contract No: SSD/1219/103CPO  Shipment date: 26/11/2019  Quantity: 38,800 kg</p>	<p>Complied</p>

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		<p>Product: CPO RSPO MB  Lorry/transport/carrier: SM6378/T/S838  Supply chain cert no: RSPO 652320  Unique identification number: TR-6c1a1fd3-ef0c</p> <p>B) CSPK  Weighbridge ticket: PKMB20000485W  Buyer: CONFIDENTIAL  Address: CONFIDENTIAL  Contract No: SSD/1020/104PK  Shipment date: 12/10/2020  Quantity: 21,0120 kg  Product: Palm Kernel RSPO MB  Lorry/transport/carrier: SD8650A  Supply chain cert no: RSPO 652320  Unique identification number: TR-010b8dce-ba4f</p>	
<p>3.8.9</p>	<p><b>Outsourcing Activities</b></p> <p>i. The mill shall not outsource its milling activities. In cases where he 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</p> <p>ii. The mill shall ensure the following:</p> <p>a. The mill has legal ownership of all input material to be included in outsourced processes</p> <p>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</p>	<p>The company has outsourced the transportation for CPO and PK delivery to third parties. Transporter Agreements were sighted as below:</p> <p>a. Landasan Kember Sdn Bhd valid from 1/1/2018 to 31/12/2020 for CPO and PK.</p> <p>b. Chong Shu Min Trading valid from 1/1/2018 to 31/12/2020 for CPO and PK.</p> <p>New contract is still in the process of renewal. This will be further verified in the next audit.</p>	<p>Complied</p>

	<p>that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c. The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>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, systems, and all information, when this is announced in advance.</p>		
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.	The list of outsourced contractors was sighted, "list of stakeholders" to include the transport contractor for CPO and PK (Landasan Kembar Sdn Bhd and Chong Shu Min Trading). The independent third parties involve in Mill operation is only transportation services for CPO and PK.	Complied
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.	No new contractor used for the processing or physical handling of RSPO certified oil palm products (transportation).	
3.8.12	<p>Record keeping</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements available for verification. As spelt out in its supply chain procedure, Clause 5.4, records are to be maintained minimum of two years.</p> <p>Mass balance sheet record all receipt of RSPO certified FFB and deliveries of RSPO certified CPO and PK on three monthly basis.</p>	Complied

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	<p>iv. For Mass Balance Module, the mill:</p> <ul style="list-style-type: none"> <li>a. Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</li> <li>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.</li> <li>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).</li> </ul>		
3.8.13	<p><b>Extraction Rate</b></p> <p>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.</p>	The oil extraction rate (OER) and the kernel extraction rate (KER) for Genting Tanjung POM is determined and set their own extraction rates based upon past experience, documented and applied consistently.	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	For the last review period, OER: 20.34 % and KER: 4.82 %	Complied
3.8.15	<p><b>Processing</b></p> <p>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.</p>	Not applicable as Genting Tanjung POM is under mass balance module.	Not Applicable
3.8.16	<p><b>Registration of Transactions</b></p> <ul style="list-style-type: none"> <li>i. Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after</li> </ul>	Shipping Announcement in the RSPO IT platform carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not within three months after	Complied

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	<p>dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>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.</p>	<p>dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p>	
3.8.17	<p><b>Claims</b></p> <p>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.</p>	<p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims</p>	Complied
<b>General corporate communications</b>			
4.1	<p>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.</p>	<p>No off-product claim made by Genting Tanjung POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>a. Display its RSPO membership status</li> <li>b. Display the RSPO web address (www.rspo.org)</li> <li>c. State that the member supports the work of the RSPO</li> <li>d. State the member's history with regard to the RSPO.</li> <li>e. Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	<p>Not applicable as no off-product claim made by Genting Tanjung POM as to date.</p>	Not Applicable
4.3	<p>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.</p>	<p>Not applicable as no off-product claim made by Genting Tanjung POM as to date.</p>	Not Applicable



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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 Genting Tanjung 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 Genting Tanjung POM and verified through document and site review (notice board, business card, shipping documentation, etc.	Complied
<b>Business to business communications</b>			
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 was 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.	As per interview with weighbridge operator, she said that the weighbridge ticket will be stated the info i.e: product/commodity with SCC model (Crude Palm Oil RSPO MB) and will stamp the RSPO certificate number. Verified the documents found that the supply chain model and certificate number were stated on the ticket.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the 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.	Genting Tanjung POM was not under distributor or wholesaler category. Thus, this requirement is not applicable.	Complied

	b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
<b>Business to consumer communication</b>			
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.	Genting Tanjung POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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.	Genting Tanjung POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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.	Genting Tanjung POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Genting Tanjung POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Genting Tanjung POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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.	Genting Tanjung POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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.	Genting Tanjung POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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	Genting Tanjung POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable

	<p>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 members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a>.</p>		
<p><b>MODULE B – MASS BALANCE SPECIFIC RULES</b></p>			
<p><b>Minimum Mass Balance content</b></p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>Site only apply MB model and the conventional CPO are downgraded from MB whenever demanded.</p>	<p>Complied</p>
	<p>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.</p>	<p>Site only apply MB model and the conventional CPO are downgraded from MB whenever demanded.</p>	<p>Complied</p>
<p><b>Labelling and trademark (MB)</b></p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>• 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</li> </ul>	<p>Site only apply MB model and the conventional CPO are downgraded from MB whenever demanded.</p>	<p>Complied</p>

	<p>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.</p> <ul style="list-style-type: none"> <li>• The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>• 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).</li> <li>• 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 &amp; Claims document.</li> </ul>		
<b>Messaging (MB)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>• [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.</li> <li>• The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</li> <li>• 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.</li> </ul> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> <li>• Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</li> </ul>	<p>Site only apply MB model and the conventional CPO are downgraded from MB whenever demanded.</p>	<p>Complied</p>

<b>Principle 4: Respect community and human rights and deliver benefits</b>			
<b>Criterion 4.1</b>			
The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>The Social Policy (incorporating the labour and human rights requirements) dated 14 September 2020 signed by President &amp; Chief Operating Officer established.</p> <p>The social Policy mentions that Genting Plantation Berhad prohibit retaliation against human rights defenders who submit complaints in good faith in line with existing Whistleblower Policy which provides a grievances channel for human rights defenders to report their concerns freely and without fear or reprisal or intimidation.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Genting Plantations Berhad ensure all personnel are treated fairly and protected from any form of discrimination that would constitute a violation of their human rights. Interviewed with the workers confirmed that no harassment by the management.</p>	Complied
<b>Criterion 4.2</b>			
There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations has established Social Policy dated 14/09/2020 where they prohibit retaliation against human rights defenders who submit complaints in good faith in line with their existing Whistleblower policy which provide a grievances channel for human rights defenders to report their concerns freely and without fear of reprisal or intimidation.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Genting Plantations Berhad has the Sustainability management Procedure Manual (Doc No: SMP-GPB-18 Rev 03 dated 29/12/2017) for guidelines on the handling of land issues/boundary conflicts including related land conflicts.</p>	Complied

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		<p>For complaints and grievances, Sustainability Management Procedure Manual for Complaints &amp; Grievances, Doc No: SMP-GPB-19, Rev: 04, Dated March 2020.</p> <p>This procedure has been communicated through the external stakeholder and internal stakeholder meeting. This year 2020 external stakeholder meeting was planned to be held in December 2020 due to COVID 19 outbreak. The internal stakeholder meetings were conducted as below:</p> <ol style="list-style-type: none"> <li>1. GTOM: 17/11/2020 attended by 12 people.</li> <li>2. GLWE &amp; GBGE: 31/10/2020 attended by 26 representatives.</li> </ol> <p>Meetings attended by contractors, school teacher, suppliers, worker’s representative and canteen owners.</p> <p>Other than that, the complaint procedure also being communicated through the sustainability procedure on group policies briefing conducted as below:</p> <ol style="list-style-type: none"> <li>1. GBGE: 19/09/2020</li> <li>2. GTOM: 10/01/2020</li> </ol>	
4.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Based on the complaint &amp; grievance book, the complainants have acknowledged if the issue has been solved by management. Sighted all the complaints were solved within the timeframe of 1 month.</p> <p>Sampled seen as below:</p> <ol style="list-style-type: none"> <li>1. GTOM: No complaint received. Only comments made by Jabatan Keselamatan dan Kesihatan Sandakan on 04/02/2020 on mill operation.</li> </ol>	Complied

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		<p>2. GLWE: Complaint on water disruption at Slidoresly's house on 16/03/2020. It was solved on 17/03/2020 and acknowledged by complainant.</p> <p>3. GBGE: Complaint on broken pipe on 06/10/2020. It was solved on 08/10/2020 and acknowledged by complainant.</p>	
4.2.4	<p>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.</p> <p>- Minor compliance -</p>	<p>As per SOP Sustainability management Procedure Manual (Doc No: SMP-GPB-18 Rev 03 dated 29/12/2017) for guidelines on the handling of land issues/boundary conflicts including related land conflicts, the parties may explore the mediation process to achieve resolution in a timely and satisfactory manner if negotiations fail to find resolution.</p>	Complied
<p><b>Criterion 4.3</b>          The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Genting Tanjung Oil Mill has contributed to the local communities especially the workers such as given meat to all the workers during festival season. Besides, the mill and GLWE has organized Polio vaccination to the children at the area. This vaccination is opened for neighbouring stakeholders as well such as children of FFB supplies. Management of Genting Bahagia Estate has distributed face masks to all workers to control the spread of virus in the estate.</p>	Not applicable
<p><b>Criterion 4.4</b>          Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
4.4.1	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p>	<p>The Social Policy (incorporating the labour and human rights requirements) dated 14 September 2020 signed by President &amp; Chief Operating Officer established.</p> <p>The social Policy mentions that Genting Plantation Berhad prohibit retaliation against human rights defenders who submit complaints</p>	Complied

	- Critical (Major) compliance -	in good faith in line with existing Whistleblower Policy which provides a grievances channel for human rights defenders to report their concerns freely and without fear or reprisal or intimidation.	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	The reviewed records of land titles and maps confirmed that there is no occurrence of FPIC process since no presence of customary land at Genting Bahagia Estate and Genting Landworthy Estate. This was also verified through stakeholders' consultation. Hence, no any FPIC agreement made as of the time of on-site audit.	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 -	The reviewed records of land titles and maps confirmed that there is no occurrence of FPIC process since no presence of customary land at Genting Bahagia Estate and Genting Landworthy Estate. This was also verified through stakeholders' consultation. Hence, no any FPIC agreement made as of the time of on-site audit.	Complied
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 -	The reviewed records of land titles and maps confirmed that there is no occurrence of FPIC process since no presence of customary land at Genting Bahagia Estate and Genting Landworthy Estate. This was also verified through stakeholders' consultation. Hence, no any FPIC agreement made as of the time of on-site audit.	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 -	The reviewed records of land titles and maps confirmed that there is no occurrence of FPIC process since no presence of customary land at Genting Bahagia Estate and Genting Landworthy Estate. This was also verified through stakeholders' consultation. Hence, no any FPIC agreement made as of the time of on-site audit.	Complied
4.4.3	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping	Land title was available and reviewed by the assessor. The mill was sitting on Genting Tanjung Estate's land. The land title was belonged to Genting Plantation. Through interview with	Complied



	<p>involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>stakeholders, there is no evidence that the use of land diminishes the land use rights of other surrounding community.</p> <p>Documents showing legal ownership sighted available as following:</p> <p><u>Genting Tanjung Oil Mill</u> Title under Genting Tanjung Estate sighted as following: Title # Country Lease (CL) 095327129; 192.4ha; 1/1/1998–31/12/2096 (99 years lease); Lot/District: Lot 095327129, Kinabatangan, Sabah.</p> <p><u>Genting Landworthy Estate</u> Hold 1 land title Title # Country Lease (CL) 095316975; 4,039 ha, lease period 1/1/1985– 31/12/2083 (98 years), legal use of land (cultivation of an agricultural crop of economic value), locality: Kinabatangan (District of Kinabatangan).</p> <p><u>Genting Bahagia Estate</u> Land titles/user rights – 3 titles: i) Title # Country Lease (CL) 095316233; 302.5ha; 1/1/1987–31/12/2085 (98 years lease); Lot/District: Lot 095316233, Kinabatangan, Sabah ii) Title # Country Lease (CL) 095316242; 304.5ha; 1/1/1987–31/12/2085 (98 years lease); Lot/District: Lot 095316242, Kinabatangan, Sabah iii) Title # Country Lease (CL) 095316993; 8094ha; 1/1/1988–31/12/2086 (98 years lease); Lot/District: Lot 095316993, Kinabatangan, Sabah (Tanjung Estate 4274.57ha + Bahagia Estate 3819.43ha)</p>	
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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 -	The reviewed records of land titles and maps confirmed that there is no occurrence of FPIC process since no presence of customary land at Genting Bahagia Estate and Genting Landworthy Estate. This was also verified through stakeholders' consultation. Hence, no any FPIC agreement made as of the time of on-site audit.	Complied
4.4.5	<b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	The reviewed records of land titles and maps confirmed that there is no occurrence of FPIC process since no presence of customary land at Genting Bahagia Estate and Genting Landworthy Estate. This was also verified through stakeholders' consultation. Hence, no any FPIC agreement made as of the time of on-site audit.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	The reviewed records of land titles and maps confirmed that there is no occurrence of FPIC process since no presence of customary land at Genting Bahagia Estate and Genting Landworthy Estate. This was also verified through stakeholders' consultation. Hence, no any FPIC agreement made as of the time of on-site audit.	Complied
<p><b>Criterion 4.5:</b>          No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within Genting Bahagia Estate and Genting Landworthy Estate. The estate lands are legally owned by Genting. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.2	<b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within Genting Bahagia Estate and Genting Landworthy Estate. The estate lands are legally owned by Genting.	Complied

	<p>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.</p> <p>- Critical (Major) compliance -</p>	<p>The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within Genting Bahagia Estate and Genting Landworthy Estate. The estate lands are legally owned by Genting. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	Complied
4.5.4	<p>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.</p> <p>- Minor compliance -</p>	<p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within Genting Bahagia Estate and Genting Landworthy Estate. The estate lands are legally owned by Genting. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	Complied
4.5.5	<p>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.</p> <p>- Minor compliance -</p>	<p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within Genting Bahagia Estate and Genting Landworthy Estate. The estate lands are legally owned by Genting. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	Complied
4.5.6	<p>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.</p>	<p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within Genting Bahagia Estate and Genting</p>	Complied

	- Minor compliance -	Landworthy Estate. The estate lands are legally owned by Genting. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	
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 -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within Genting Bahagia Estate and Genting Landworthy Estate. The estate lands are legally owned by Genting. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within Genting Bahagia Estate and Genting Landworthy Estate. The estate lands are legally owned by Genting. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
<b>Criterion 4.6</b> Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Genting Plantations Berhad has developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates (Doc. No.: SMP-GPB-18, Rev. 03 dated 29/12/2017). The objective of the procedure is to provide guidelines on the handling of land issues/ boundary conflicts, including related land conflicts. Negotiation and legal proceedings may be carried out interchangeably or simultaneously. Compensations procedures were outlined in the procedure.	Complied

4.6.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>SOP as per indicator 4.6.1.</p> <p>There was no dispute that involved compensation in Genting Bahagia Estate and Genting Landworthy Estate.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>There were no scheme smallholders attached with Genting Tanjung Oil Mill certification unit.</p>	Complied
4.6.4	<p>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.</p> <p>- Minor compliance -</p>	<p>There were no scheme smallholders attached with Genting Tanjung Oil Mill certification unit.</p>	Complied
<p><b>Criterion 4.7</b>  Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates (Doc. No.: SMP-GPB-18, Rev. 03 dated 29/12/2017). The objective of the procedure is to provide guidelines on the handling of land issues/ boundary conflicts, including related land conflicts. Negotiation and legal proceedings may be carried out interchangeably or simultaneously. Compensations procedures were outlined in the procedure.</p>	Complied
4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>SOP as per indicator 4.6.1.</p>	Complied

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4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>There was no community that have lost access and rights to land for plantation since there was no expansion by the company during the time of audit. However, the company has provided job opportunity to the local communities as this has verified through the master list of employee.</p>	Complied
<p><b>Criterion 4.8</b>  The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>There was no dispute that involved compensation in Genting Bahagia Estate and Genting Landworthy Estate.</p>	Complied
4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>There was no dispute that involved compensation in Genting Bahagia Estate and Genting Landworthy Estate.</p>	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	<p>There was no acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.</p>	Complied

4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	There was no dispute that involved compensation in Genting Bahagia Estate and Genting Landworthy Estate.	Complied
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	FFB pricing based on records of MPOB Press Release, MPOB Monthly FFB Reference Price - October 2020 (Mill gate); Sabah RM 27.63/1% OER. There is also estimated profitability for Outside Crop Processed for each month. Noted for Sabah Average CPO price is RM 2952.50 and PK price is RM 1,563.50 with OER (19.65%) and KER 4.75%.	Complied
5.1.2	<b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	The mill has explained the FFB pricing and pricing mechanism to the FFB suppliers prior they signed the <i>Polisi Perolehan Tandan Buah Sawit (TBS)</i> [External Fresh Fruit Bunch (FFB) Procurement Policy Agreement]. There are total 10 FFB suppliers during the audit and sampled of the policies signed by the FFB suppliers as below: <ol style="list-style-type: none"> <li>1. Winking Plantation Sdn Bhd signed on 22/08/2019</li> <li>2. Tey Ah Bu Plantations Sdn Bhd signed on 27/08/2019</li> <li>3. Tenera Eco Plantation Sdn Bhd signed in 23/08/2019</li> <li>4. Tentu Murni Sdn Bhd signed on 27/08/2019</li> </ol> Acknowledgement form from FFB suppliers to confirm that they have read and understand the External Fresh Fruit Bunch (FFB) Procurement Policy Agreement dated 21 – 27/08/2019 was sighted. Interviewed with the FFB suppliers confirmed that they have been briefed on the pricing mechanism.	Not applicable

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5.1.3	<b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Fair pricing calculated based on averaged monthly price declared by MPOB with the respective month of OER awarded to suppliers. The pricing mechanism was outlined in the External Fresh Fruit Bunch (FFB) Procurement Policy Agreement signed by the FFB suppliers.	Not applicable
5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	FFB suppliers that supplied to Genting Tanjung Oil Mill are small plantations company. They are not independent or scheme smallholders. They are not bonded by the any contract. The mill has provided assistance upon request such as supplied diesel to the suppliers and at the end of the month will credited back to the FFB suppliers. Seen the Store Requisition Issuance Note# 15727 dated 05/02/2021 for Tenera Eco Plantation Sdn Bhd for diesel and the invoice# GTOMCI00001040 dated 28/02/2021 was issued to the supplier.	Not applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Genting Oil Mills (Sabah) Sdn. Bhd has the agreement with outside FFB supplier. Sighted the agreement between Genting Oil Mills (Sabah) Sdn. Bhd and Ace Foremost Sdn Bhd dated 21/05/2018 and Anchor prospects Sdn Bhd dated 21/05/2018. Every FFB supplied is based on 100% grade quality and rejected bunches will be return to the supplier based on MPOB quality requirement.	Complied
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Payment sampled for FFB suppliers as below follow the agreement with the FFB suppliers: <ol style="list-style-type: none"><li>1. Anchor Prospects Sdn Bhd: transaction reference: 52118934100010; RM 50,832.11 dated 11/11/2020.</li><li>2. Ace Foremost Sdn Bhd; transaction reference: 521189340100009; RM 87,935.76 dated 11/11/2020.</li></ol>	Complied
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).	Genting Tanjung Oil Mill conducts yearly calibration on their weighbridge used to determine the FFB tonnage for all FFB suppliers. Latest Calibration was done on 11.02.2020; Safety Tag	Complied



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	- Minor compliance -	Number: Q001910 2.1K; Weighbridge Serial Number: 185050318; 60, 000 kg x 10 kg) by Metrology Corporation Malaysia Sdn Bhd.	
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	There is no independent smallholders engaged by the mill. Genting Oil Mill only received FFB from own supply bases and small plantations company. Thus, this indicator is not applicable.	Not applicable
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	The grievance mechanism for smallholders were using the same grievance mechanism with internal and external stakeholders as below:  <ol style="list-style-type: none"> <li>1. Genting Plantations Berhad has the Sustainability management Procedure Manual (Doc No: SMP-GPB-18 Rev 03 dated 29/12/2017) for guidelines on the handling of land issues/boundary conflicts including related land conflicts.</li> <li>2. For complaints and grievances, Sustainability Management Procedure Manual for Complaints &amp; Grievances, Doc No: SMP-GPB-19, Rev: 04, Dated March 2020.</li> </ol> This procedure has been communicated to the external stakeholder and internal stakeholder meeting. This year 2020 external stakeholder meeting was planned to be held in December 2020 due to COVID 19 outbreak. The internal stakeholder meetings (included contractors, suppliers, neighbouring estates, FFB suppliers/smallholders) were conducted as below:  <ol style="list-style-type: none"> <li>1. GTOM: 17/11/2020 attended by 12 people.</li> <li>2. GLWE &amp; GBGE: 31/10/2020 attended by 26 representatives.</li> </ol>	Complied

		However, there is no complaint raised by smallholder/FFB suppliers until today.	
<b>Criterion 5.2</b>			
The unit of certification supports improved livelihoods 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 -	No independent smallholders within Genting Tanjung Oil Mill certification unit. There are only small plantations company. Thus, this indicator is not applicable.	Not applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	No independent smallholders within Genting Tanjung Oil Mill certification unit. There are only small plantations company. Thus, this indicator is not applicable.	Not applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	No independent smallholders within Genting Tanjung Oil Mill certification unit. There are only small plantations company. Thus, this indicator is not applicable.	Not applicable
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	No independent smallholders within Genting Tanjung Oil Mill certification unit. There are only small plantations company. Thus, this indicator is not applicable.	Not applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	No independent smallholders within Genting Tanjung Oil Mill certification unit. There are only small plantations company. Thus, this indicator is not applicable.	Not applicable

<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<p><b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>A publicly available policy on equal opportunities as per People Policy; Rev. 00; Date: 3/8/2009 sighted and implemented accordingly. Based on the policy, 'we prohibit any form of violence, harassment or discrimination against race, religion, national origin, disability, pregnancy, age and gender. No one shall be denied of their rights, freedom of association and equal opportunities'.</p>	Complied
6.1.2	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>The process of recruitment, promotion and remuneration are solely based on individual qualification and performance regardless of religion, race, age, gender, nationality or physical disability. Interviewed with the workers from different nationalities and gender confirmed that no discrimination happened in the company. The management treated all equally and provide equal opportunity for promotion based on capabilities. Female workers have been promoted as mandores well. Interviewed with the female workers confirmed that they are allowed to transfer job if they found unfit or want to change new job scope. There was no recruitment fee being paid by the workers during the time of audit.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>The recruitment has been based on the skill and expertise for the job related in estate and mill. This is well explained in the Procedural Instruction: Foreign Workers Employment, Payment and Recoverable; Doc No: GEN-13, Revision 02, Issue Date 09/11/2020 too.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>Interviewed with the female workers confirmed that no pregnancy testing is conducted by the company as a measure for recruitment. They will informed to the Hospital Assistant if they are pregnant for</p>	Complied

	- Minor compliance -	job transfer. Hospital Assistant will monitor on monthly basis for female sprayers and manurer if they have pregnant.	
6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Gender committee was formed as the grievance and platform mechanism for sexual harassment, reproductive rights, etc. Meeting were conducted twice a year.</p> <p>Sighted the minute of meeting for each unit as below:</p> <ol style="list-style-type: none"> <li>1. 15/05/2020 (GLWE).</li> <li>2. 14/07/2020 (GBGE).</li> <li>3. 14/09/2020 (GTOM).</li> </ol> <p>Issues regarding activities, recommendation, grievance and complaint were discussed in the meeting. So far, no sexual harassment cases reported.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	Either female or male workers, they were paid equally based on job type and skills. Further pay slip reviewed on clause 6.2.3	Complied
<p><b>Criterion 6.2</b></p> <p>Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	The training for contract agreement were given to worker during their induction training and also prior to arrive in Malaysia. The agreement used was the same agreement signed by worker with the agent and embassy where no changes on the terms and conditions.	Complied

<p>6.2.2</p>	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members. - Critical (Major) compliance -</p>	<p>Agreement template Sabah OUs; Revised on 01/12/2019 is the latest agreement in Malay language use for employment contract to employee. Employment contract is signed by each worker detailing the working hours, rest days, levi, overtime, etc. Sampled below workers: GTOM: Employee id: E00110 Employee id: E00060 Employee id: E00069 Employee id: E00197  GBGE: Employee id: E11833 Employee id: E11943 Employee id: E12096 Employee id: E11961  GLWE: Employee id: E00160 Employee id: E02175 Employee id: E00049</p>	<p>Complied</p>
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		Employee id: E02218	
6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>No deduction been made except for advance and other lawful deduction such as EPF, SOCSO and EIS. Sighted the pay slip as below:</p> <p>Sampled below workers:</p> <p>GTOM:</p> <p>Employee id: E00110</p> <p>Employee id: E00060</p> <p>Employee id: E00069</p> <p>Employee id: E00197</p> <p>GBGE:</p> <p>Employee id: E11833</p> <p>Employee id: E11943</p> <p>Employee id: E12096</p> <p>Employee id: E11961</p> <p>GLWE:</p> <p>Employee id: E00160</p> <p>Employee id: E02175</p> <p>Employee id: E00049</p>	Complied

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6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Tanjung Oil Mill, Genting Bahagia Estate and Genting Landworthy Estate has provided free housing with free facilities such as clinic, water and electricity to all the workers. HUMANA school was established in the estate and giving opportunity to the children to access to education. GBGE’s management has developed a Housing Master Plan 2021 – 2025 to upgrade the labour quarters stage by stage. Management of GLWE has constructed 2 blocks of new labour quarters last year and site visit to the new quarter found no issue. Besides, the management has 4 years plan of CAPEX to upgrade and construct new labour quarters to replace wooden labour quarters..</p> <p>Linesite inspection was carried out by Hospital Assistant on weekly basis and the last inspection was carried out 17/03/2021 in GBGE and 12/03/2021 in GTOM using <i>Borang Pemeriksaan Kawasan Perumahan</i> checklist.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Interviewed with the workers confirmed that they are easily access to adequate, sufficient and affordable foods where sundry shops are available inside the estates.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b> <b>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</b> <b>(Endorsed by the RSPO BoG on 7th November 2019)</b></p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavor to carry out DLW country benchmarks for palm oil producing</p>	<p>The DLW was established for both mill and estates dated 13/12/2019 as below:</p> <p>Housing cost/worker/moth: RM 256.76. Grand total in kind benefits: RM 692.32. Prevailing wages: RM 1,977.88 (average take home pay/piece rated harvesters) &amp; RM 1,707.32 (minimum earned wage by check roll general workers).</p>	Complied

<p>countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><b><i>Where a GLWC living wage standard (benchmark), or one that fulfills the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></b></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><b><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The</i></b></p>		
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	<p>RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> <li>• The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>All the core works are performed by permanent and full-time employees in Genting Tanjung Oil Mill certification unit. There were contractors' workers work as FFB transporters in the estates permanently. There were no casual or temporary workers used in the company.</p>	Not applicable
<p><b>Criterion 6.3</b></p> <p>The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			

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6.3.1	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The statement published as per as per People Policy; Rev. 00; Date: 3/8/2009 sighted available in local languages recognizing freedom of association.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>There is a Workers' Welfare &amp; Housing Committee established in Genting Tanjung Oil Mill. The last meeting was conducted on 04/09/2020 with total 7 participants. The committee formed by having representatives from local workers, Bugis workers and management. Meeting minutes was sighted. There were issues raised during the meeting and previous meeting. Action plan was developed with proposed action and status of the issue. The concerns raised were closed with evidence sighted.</p> <p>Workers' Committee was established in Genting Bahagia Estate and Genting Landworthy Estate. The committee was formed by the representatives of local workers, female workers, Bugis workers and management. The last meeting was conducted on 17/10/2020 in Genting Bahagia Estate and 04/02/2021 in Genting Landworthy Estate. Meeting minutes were sighted. Concerns were raised during the meeting.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>The management did not interfere the formation of the workers' committee. All the committee representatives were elected freely by the workers. Interviewed with the workers confirmed that the election of the representatives was elected freely by the workers without any interference of management.</p>	Complied
<p><b>Criterion 6.4</b>          Children are not employed or exploited.</p>			

6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The Social Policy dated 14/09/2020 has mentioned the protection of children. The policy mentions 'We shall not use any child labour. Children's rights are respected'.</p> <p>Under agreement contracts, it is mentioned in the clause 2.6 (i) The contractor shall ensure no minors (below 18 years old) are employed. Sampled the contract agreement as below:</p> <p>GTOM: Chong Shu Min Trading Sdn Bhd dated 16/05/2019 and Landasan Kembar Sdn Bhd dated 01/01/2018.</p> <p>GLWE: Adnan Khair Transport dated 01/01/2020 &amp; Chong Nyuk Fah Transport dated 01/07/2020.</p> <p>GBGE: Wong Tet Ming Transport dated 01/01/2020 and Seng Vui Contractor dated 01/01/2020.</p>	Complied
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>Based on Workers List as of 2020 for both mill and estates, no any children being employed or exploited.</p> <p>There is also the Procedures for Social Management Doc No: SMP-GPB-32 Rev 00 dated 18/01/2018 under clause 6.8.4 child labour, young workers (under aged) and illegal workers, refer to Social Policy part 3, child labour:</p> <p>Indicators:</p> <ul style="list-style-type: none"> <li>• The company does not employ workers less than 15 years of age for full time work and 18 years of age for hazardous work.</li> <li>• If the company employs minors below the age of 18 the company has a list of job functions that can safely be performed by minors.</li> </ul>	Complied
6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Master Listing and through interviewed with the stakeholders. Visited the creche and HUMANA and interviewed with the children confirmed that they did not follow their parents to the field to work.</p>	Not applicable

6.4.4	<p>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.</p> <p>- Minor compliance -</p>	<p>The Social Policy has been briefed to all the stakeholders during stakeholder meeting on 31/10/2020. Besides, the contractor will sign on the contract agreement where child labour is prohibited under Clause 2.5 (D) (i).</p>	Not applicable
<p><b>Criterion 6.5</b></p>			
<p>There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has implemented a Sexual Harassment Policy dated 3/8/2009 signed by Chief Operating Officer. There is also 'Guidelines on Prevention and Eradication of Sexual Harassment at the Workplace, version 0 (2010) by Sustainability Department.</p> <p>This policy has been communicated through the external stakeholder and internal stakeholder meeting. This year 2020 external stakeholder meeting was planned to be held in December 2020 due to COVID 19 outbreak. The internal stakeholder meetings were conducted as below:</p> <ul style="list-style-type: none"> <li>• GTOM: 17/11/2020 attended by 12 people.</li> <li>• GLWE &amp; GBGE: 31/10/2020 attended by 26 representatives.</li> </ul> <p>Meetings attended by contractors, school teacher, suppliers, worker's representative and canteen owners.</p> <p>Other than that, the complaint procedure also being communicated through the sustainability procedure on group policies briefing conducted as below:</p> <ul style="list-style-type: none"> <li>• GBGE: 19/09/2020</li> <li>• GTOM: 10/01/2020</li> </ul>	Complied

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<p>6.5.2</p>	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has implemented a Social Policy (Incorporating the Labour and Human Rights requirements) dated 14/09/2020. In the policy statement, it mentioned that reproductive rights are protected.</p> <p>This policy has been communicated through the external stakeholder and internal stakeholder meeting. This year 2020 external stakeholder meeting was planned to be held in December 2020 due to COVID 19 outbreak. The internal stakeholder meetings were conducted as below:</p> <ul style="list-style-type: none"> <li>• GTOM: 17/11/2020 attended by 12 people.</li> <li>• GLWE &amp; GBGE: 31/10/2020 attended by 26 representatives.</li> </ul> <p>Meetings attended by contractors, school teacher, suppliers, worker’s representative and canteen owners.</p> <p>Other than that, the complaint procedure also being communicated through the sustainability procedure on group policies briefing conducted as below:</p> <ul style="list-style-type: none"> <li>• GBGE: 19/09/2020</li> <li>• GTOM: 10/01/2020</li> </ul>	<p>Complied</p>
<p>6.5.3</p>	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -</p>	<p>Genting Bahagia Estate has carried out new mother assessment on 25/02/2021 with 3 new mothers in the estate by Hospital Assistant. Outcome of the consultation and assessment was recorded in the report. Interviewed with one of the new mother confirmed that the management has provided free transportation to send the baby to government clinic for vaccination and they are allowed to take annual leave whenever it is required. Their needs and requests have been fulfilled by the management.</p>	<p>Minor Non Compliance</p>

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		<p>There were 2 new mothers reported in Genting Landworthy Estate. Interviewed with the new mothers confirmed that the management has assessed their needs and fulfilled their requests accordingly. For eg: given break time for the mother to breastfeed and provide transport to the government clinic whenever required.</p> <p>There was one new mother just delivered on December 2020 in Genting Tanjung Oil Mill and one new mother delivered on September 2020 in Genting Landworthy Estate. However, no evidence of assessment of the needs of the new mothers in consultation was sighted. This has confirmed through interview with both of the new mothers. Thus, a minor Nc was issued.</p>	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Genting Plantations Berhad has established Complaints and Grievances Procedure (Doc. No.: SMP-GPB-19, Rev. 04 dated March 2020) to provide guidelines on handling the complaint &amp; grievances. Written complaints can be delivered to management anonymously by post, email, SMS or via complaint and suggestion box. Any private and confidential complaints can be extended to VP-HRAD at Head Office in Kuala Lumpur. The procedure was briefed to the workers on 16/03/2021. Interviewed with the female workers confirmed that they are understood the complaint procedure.</p>	Complied
<p><b>Criterion 6.6</b>          No forms of forced or trafficked labour are used.</p>			
6.6.1	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> </ul>	<p>The passports were kept in estate/mill office with worker's consent and voluntarily for safekeeping.</p> <p>There are no recruitment fees charges to workers based on the documentation review at pay slip and online interview with employee representatives.</p>	Complied

	<ul style="list-style-type: none"> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>No contract substitution as the employment contract provided by estate is similar with the terms and condition with the demand letter signed by labour agency and Indonesian Embassy.</p> <p>There is overtime form for workers who offer work overtime which has consent between management and workers.</p> <p>Termination of employment are:</p> <ul style="list-style-type: none"> <li>• Work with other employers.</li> <li>• Not comply with the law.</li> <li>• Irresponsible in works.</li> <li>• Absent for more than 2 days without valid reason</li> </ul>	
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Specific labour policies i.e. People Policy and Social Policy evidently implemented where migrant workers are treated equally as per the local workers.</p>	Complied
<p><b>Criterion 6.7</b></p>			
<p>The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p><u>Genting Tanjung Oil Mill</u></p> <ol style="list-style-type: none"> <li>1. The Mill Manager has been appointed as the chairman for the OSH Committee at Genting Tanjung Oil Mill as stated in the appointment letter dated 02.01.2020 undersigned by the Senior Manager. The Chairman is accountable to oversee all OSH related issues within his vicinity.</li> <li>2. OSH Meetings were conducted every 3 months to address OSH related issues. The meetings discussed accident statistics, PPE usage and monitoring, review of HIRARC, main estate operations, functions and contributions of Safety &amp; Health Committee, OSH Training Program, workplace inspection report</li> </ol>	Complied

		<p>and emergency response plan among others. The latest meeting was conducted on 09.09.2020.</p> <p><u>Genting Bahagia Estate</u></p> <ol style="list-style-type: none"> <li>1. The Estate Manager has been appointed as the chairman for the OSH Committee as stated in the appointment letter dated 17.10.2018 undersigned by the Vice President – Plantations (Sabah – Region 2). The Chairman is accountable to oversee all OSH related issues within his management vicinity. The latest OSH Organizational Chart was available and updated on 1<sup>st</sup> June 2020.</li> <li>2. OSH Meetings were conducted every 3 months to address OSH related issues. The meetings discussed accident statistics, PPE usage and monitoring, review of HIRARC, main estate operations, functions and contributions of Safety &amp; Health Committee, OSH Training Program, workplace inspection report and emergency response plan among others. The latest meeting was conducted on 19.09.2020.</li> </ol> <p><u>Genting Landworthy Estate</u></p> <ol style="list-style-type: none"> <li>1. The Senior Manager has been appointed as the chairman for the OSH Committee as stated in the appointment letter dated 23.06.2020 undersigned by the Vice President – Plantations (Sabah – Region 2). The Chairman is accountable to oversee all OSH related issues within his management vicinity.</li> <li>2. OSH Meetings were conducted every 3 months to address OSH related issues. The meetings discussed accident statistics, PPE usage and monitoring, review of HIRARC, main estate</li> </ol>	
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		<p>operations, functions and contributions of Safety &amp; Health Committee, OSH Training Program, workplace inspection report and emergency response plan among others. The latest meeting was conducted on 18.07.2020</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p><u>Genting Tanjung Oil Mill</u></p> <ol style="list-style-type: none"> <li>1. Emergency Response Procedures was available in the document Genting Oil Mills (Sabah) Sdn. Bhd ; Emergency Response Procedures; Doc Number: SP-MGR-04; Doc Date: 01.08.2017. The ERP includes plans and procedures for emergency incidences such as fire outbreak, oil/chemical spillage, effluent overflow and accident. An emergency response team have been created in the mill to combat the incidences mentioned above. Regular trainings and drills are conducted for the team to handle emergencies.</li> <li>2. First aid kit inventory was available for verification. It was acknowledged that all required items were stated in the inventory and does not contain consumable medicines. The first aid holder’s summary list was also available to include all important operations and worksites.</li> <li>3. SOP for handling and reporting accidents were available in the document System Procedure: NADOPOD; Doc Number: SP-MGR-06; Doc Date: 01.08.2017. There were no accident cases reported for the year 2019. The JKPP 8 Form for 2019 was submitted on 07.01.2020 for the year ending 2019. There was no accident reported for the year 2020 as of to date.</li> </ol> <p><u>Genting Bahagia Estate</u></p> <ol style="list-style-type: none"> <li>1. Emergency Response Procedures were available for verification. Among the ERP verified were the layout plans and maps for fire,</li> </ol>	<p>Complied</p>

		<p>accident, emergency evacuation, emergency assembly point, fire extinguisher, first aid kit location and emergency contact person. The latest ERP Training was conducted on 07.10.2020</p> <ol style="list-style-type: none"> <li>2. First aid kit inventory was available for verification. It was acknowledged that all required items were stated in the inventory and does not contain consumable medicines. The first aid holder's summary list was also available to include all important operations and worksites.</li> <li>3. Records of accidents were maintained by the estate and available for verification during the audit. There was a total of 3 accident cases reported for the year 2019 in the estate. The nature of accident, injury inflicted and lost mandays were all recorded. The JKKP 8 Form was submitted on 8<sup>th</sup> January 2020 with the report available for verification. There were 1 case reported for the year 2020. The JKKP 6 form was raised and submitted accordingly and available for verification.</li> </ol> <p>Genting Landworthy Estate</p> <ol style="list-style-type: none"> <li>1. Emergency Response Procedures were available for verification. Among the ERP verified were the layout plans and maps for fire, accident, emergency evacuation, emergency assembly point, fire extinguisher, first aid kit location and emergency contact person. An Emergency Command Organization was formed to include all personals responsible during emergency outbreaks. Fire Extinguisher Training was conducted on 22.06.2020 for all staffs and workers of the estate.</li> <li>2. First aid kit inventory was available for verification. It was acknowledged that all required items were stated in the inventory and does not contain consumable medicines. The first</li> </ol>	
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		<p>aid holder’s summary list was also available to include all important operations and worksites. Basic Life Support and First Aid Training was conducted on 09.03.2020. First Aid Kit Demo and Briefing was conducted on 01.07.2020.</p> <p>3. Records of accidents were maintained by the estate and available for verification during the audit. There was a total of 4 accident cases reported for the year 2019 in the estate. The nature of accident, injury inflicted and lost mandays were all recorded. The JKKP 8 Form was submitted on 9<sup>th</sup> January 2020 with the report available for verification. There were no cases reported for the year 2020.</p>	
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required and appropriate PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers rooms were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause them.</p>	Complied
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for Dec 2020, Jan 2021 and Feb 2021 for all operating units visited as below.</p>	Complied

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		Operating Units	Month	No of Employees	Amount (RM)	
		Genting Tanjung Oil Mill	Dec 2020	114	38,240.00	
			Jan 2021	113	25,000.00	
			Feb 2021	112	25,990.00	
		Genting Bahagia Estate	Dec 2020	230	4,902.20	
			Jan 2021	225	3,700.20	
			Feb 2021	218	3,629.70	
		Genting Landworthy Estate	Dec 2020	268	3,151.00	
			Jan 2021	262	4,520.40	
			Feb 2021	257	4,257.80	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Operating Units	2019	2020	Complied	
		Genting Tanjung Oil Mill	Nil	Nil		
		Genting Bahagia Estate	3 Cases (42 Days)	1 Case (14 Days)		
		Genting Landworthy Estate	4 cases (7 Days)	Nil		

**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.

<p>7.1.1</p>	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.          - Critical (Major) compliance -</p>	<p>The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rats among others. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Barn owls <i>Tyto Alba</i> has been introduced for biological control of rats. Barn owl boxes are constructed at the rate of 1 box to 20ha. Census records show that there was minimal outbreak of leaf eating pest. Although there have been minimal outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators and further reduce the outbreak. Records show that the estates have planted beneficial plants such as <i>Cassia cobanensis</i> and <i>Turnera subulata</i> and <i>Antigonon leptopus</i>.</p> <p>Yearly specific plans were available for the year 2020 by the estates. Sighted the IPM Plan for each estate as below:</p> <p><u>Genting Bahagia Estate</u></p> <ol style="list-style-type: none"> <li>1. To perform rat damage census and rat baiting programme as per census results.</li> <li>2. To perform rhinoceros beetle damage census.</li> <li>3. To maintain current beneficial plants area. Current planted area: 1300 Ha. To plant and upkeep the legume cover crop &amp; mucuna <i>bratetea</i> in immature area to minimize breeding ground for rhinoceros beetle.</li> <li>4. To increase head of cattle and area covered. Current: 177 Heads (Covered 1350 Ha). Expected: 200 Heads (Covered 1500 Ha)</li> </ol>	<p>Complied</p>
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		<p><u>Genting Landworthy Estate</u></p> <ol style="list-style-type: none"> <li>Increase planting area of beneficial plant. Current area: 690 Ha; Expected area: 1400 ha.</li> <li>Increase barn Owl Ratio according to Oil Palm Manual. Current Ratio: 1:60; Planned Ratio: 1:20.</li> <li>Increase barn owl population. Stop completely the usage of 3<sup>rd</sup> generation rat bait.</li> </ol>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>Species referenced in the Global Invasive Species Database and CABI.org are not used in the estates.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There were no evidence of use of fire for pest control in all the estates.</p>	Complied
<p><b>Criterion 7.2</b>  Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>All pesticides used were those officially registered under the Pesticide Act 1974. All estates uses only class II, class III &amp; class IV pesticides as verified via the chemical register and the chemicals available in the chemical store of the respective estates.</p> <ol style="list-style-type: none"> <li>No illegal agrochemicals (stated by local and international laws) paraquat was used in their estates.</li> <li>The usage of the agrochemicals was based on the Sustainability Management Procedure doc no SMP-GPB-28 titled Justification</li> </ol>	Complied

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		<p>Of Pesticides Used revised on 17/03/2015. SOP and in the Pictorial Safety Standard Book where written justifications had been provided for various fields operations.</p> <p>The Manual has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs.</p>													
7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained by the state and submitted to the Head Quarters monthly. Sampled the chemicals used for the month Jan 2021 and Feb 2021 as below:-</p> <table border="1"> <thead> <tr> <th>Operating Units</th> <th>2018</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td>Genting Bahagia Estate</td> <td>1.041</td> <td>1.229</td> <td>0.883 (as of Oct 2020)</td> </tr> <tr> <td>Genting Landworthy Estate</td> <td>0.770</td> <td>1.148</td> <td>0.461 (as of Jun 2020)</td> </tr> </tbody> </table>	Operating Units	2018	2019	2020	Genting Bahagia Estate	1.041	1.229	0.883 (as of Oct 2020)	Genting Landworthy Estate	0.770	1.148	0.461 (as of Jun 2020)	Complied
Operating Units	2018	2019	2020												
Genting Bahagia Estate	1.041	1.229	0.883 (as of Oct 2020)												
Genting Landworthy Estate	0.770	1.148	0.461 (as of Jun 2020)												
7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p> <p>Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas.</p>	Complied												

		Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	There is no evidence of prophylactic use of pesticides in all estates visited.	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. The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat 7.2.5b Why there is no other alternative which can be used 7.2.5c Which process was applied to verify why there is no other less hazardous alternative 7.2.5d What is the process to limit the negative impacts of the application 7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. - Minor compliance -	Both estates do not use chemical that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions or Paraquat in their daily operations. This was established during the verification of the chemical register of both estates and interview with the management representative.  This can also be evident in the estates Continual Improvement Plans which the estates have committed to: 1. Use of alternative pesticides that are safe and less toxic. Change from Paraquat to other alternative chemicals i.e. Glyphosate, Glufosinate and, Monosodium. 2. Briefing to staffs and executives on minimizing pesticides and continue monitoring, avoid wastage and leakage, etc. 3. Planting cover crops at immature fields. Strive to establish covers before planting. 4. Increase Beneficial Plant areas. 5. Implement Cattle Grazing at suitable areas for reducing pesticides use which in changing spraying technique from circle and path spraying to circle spraying only.	Complied



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		6. Commence manual uprooting/slashing for selective weed control.														
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p> <table border="1"> <thead> <tr> <th>Operating Unit</th> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td rowspan="2">GBGE</td> <td>3M Respiratory Protection Training on the usage and maintenance of respirators.</td> <td>12.02.2020</td> </tr> <tr> <td>Spraying Operation Training (PND Gang)</td> <td>17.02.2020</td> </tr> <tr> <td rowspan="2">GLWE</td> <td>Safe and Judicious use of Pesticide Training and Calibration</td> <td>18.03.2019</td> </tr> <tr> <td>Spraying SOP and PPE Training</td> <td>27.02.2020</td> </tr> </tbody> </table>	Operating Unit	Training	Date	GBGE	3M Respiratory Protection Training on the usage and maintenance of respirators.	12.02.2020	Spraying Operation Training (PND Gang)	17.02.2020	GLWE	Safe and Judicious use of Pesticide Training and Calibration	18.03.2019	Spraying SOP and PPE Training	27.02.2020	Complied
Operating Unit	Training	Date														
GBGE	3M Respiratory Protection Training on the usage and maintenance of respirators.	12.02.2020														
	Spraying Operation Training (PND Gang)	17.02.2020														
GLWE	Safe and Judicious use of Pesticide Training and Calibration	18.03.2019														
	Spraying SOP and PPE Training	27.02.2020														
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with</p>	Complied													

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		adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.	
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Pesticide containers were found to be recycled and used as premix containers. The access containers were all triple rinsed and punctured and stored at the designated store before they are disposed to the licensed recycle waste collector.</p> <p>Sighted the latest consignment note for disposal of triple rinsed and punctured chemical drums as below: -</p> <p><u>Genting Bahagia Estate</u></p> <p>Disposed to G-Planter on 04/01/2020; 20 Liters Container: 167 Units, Garlon mix 4 Liters: 7 Units, Starane: 1 Liters and Spray Equipment: 13 units.</p> <p><u>Genting Landworthy Estate</u></p> <p>Disposed to G-Planter on 04/01/2020; 4 litres container: 4 units; 20 Litres container: 20 units: Garlon Mix 4 Liters: 2 units: Spray Equipment (CKS): 12 units; Miracle Containers: 53 Units.</p> <p>Empty Chemical Containers are stored in the Scheduled Waste store temporarily before transferred to the premix area where it is triple rinsed, punctured and stored to be disposed as Recyclable Waste to the Licensed Waste Manager. Since 04/01/2020, the estate has issued a total of 198 units of empty chemical containers to date. The Empty Chemical Gallon Record shows only 77 units in the empty chemical containers inventory. The physical stock verified in the scheduled waste store and premix area was a total of 87 units. The balance empty chemical containers were not traceable. There were no records of storage or disposal of 4 liters chemical containers since the last disposal on 04/01/2020. The issuance records shown</p>	Minor Non Compliance

		that there were a total of 78 containers used since the last disposal on 04/01/2020. Thus, a minor NC was issued.	
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	The management representative has concluded that there is no aerial spraying conducted in the estates.	Complied
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Specific Annual Medical Surveillance was conducted for all workers exposed to chemicals including sprayers, mandores,</p> <p><u>Genting Bahagia Estate</u></p> <p>Medical Surveillance was conducted on 14 March 2020 for a total of 31 workers exposed to chemical and fumes. All workers were declared fit to work with no traces of cholinesterase or manganese in the samples. The latest medical surveillance was conducted for 32 workers deemed to be exposed to hazardous chemicals. The medical surveillance was conducted at Klinik Elopura Sdn Bhd awaiting the results.</p> <p><u>Genting Landworthy Estate</u></p> <p>Medical Surveillance was not required for Genting Landworthy Estate as stated in the Chemical Hazard Risk Assessment Report as all the chemical do not phosfrtf5rf</p>	Complied
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	Genting Plantations Berhad; Sustainability Management Procedure Manual – Legal Requirement Register; Doc Number: SMP-GPB-22 (Page 46 of 54); 12. Pesticides (Highly Toxic Pesticides) Regulation 1966, section 3 (a); 1. <i>Larangan – Tiada seorang pun majikan yang terlibat dengan penggunaan atau pengendalian racun makhluk</i>	Complied

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		<p><i>perosak amat berbisa boleh – (c) menyebabkan dan membenarkan seorang pekerja wanita yang mengandung atau sedang menyusukan untuk menggunakan atau mengendalikan racun makhluk perosak amat berbisa.</i></p> <p>It was sighted during the visit to the stores there were signages stating that pregnant and breast-feeding women are not allowed to enter the chemical stores.</p>	
<p><b>Criterion 7.3</b>  Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Segregation of wastes i.e. general wastes and scheduled wastes including clinical waste was verified in the mill/estates.</p> <p>Proper storage areas were identified for the storage of the recyclable wastes at the estates and mill with adequate pollution control methods been implemented e.g. disposal of non-scheduled waste (empty chemical container). Environmental Improvement Plan/Pollution Prevention Plan for year 2020 been established accordingly e.g. for Leaking of pesticide during chemical mixing and washing and leaking of lubricant/oil from servicing/parking tractor.</p>	Complied
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Disposal of scheduled waste was made through licensed contractor, Lagenda Bumimas Sdn Bhd (Scheduled waste collector). Visit to housing compound and fields shows the disposals of waste are satisfactory.</p>	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>There were no evidence that Genting Tanjung Oil Mill uses fire for waste disposal. All waste disposal were conducted responsibly in line with the waste management plan.</p>	Complied
<p><b>Criterion 7.4</b></p>			

Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>The estates are guided by the following Manuals and SOPs to ensure Good Agricultural practices throughout the operation:</p> <ol style="list-style-type: none"> <li>1. Genting Plantations Oil Palm Manual (OPM) issued on 09.11.1999</li> <li>2. Sustainability Management Procedure Manual 01.08.2013 revised in 07.02.2019.</li> <li>3. Environmental Control Procedure – 01.09.2018</li> <li>4. Standard Operating Procedure (West Malaysia Estates) 01.01.2011.</li> </ol> <p>The soil fertility and yield enhancement are described in detail in the Oil Palm Manual under the following sections:</p> <ol style="list-style-type: none"> <li>5. Oil Palm Manual - No 7; Manuring of Oil Palm</li> <li>6. Oil Palm Manual - No 13; Managing Difficult Soils</li> </ol>	Complied
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p><u>Genting Bahagia Estate</u></p> <p>Plant Test Report (Tissue Sampling) was done for Genting Bahagia Estate by Genting Plantations Research Centre on 03/07/2020 (Test Report Number: PR32/2020. The report was issued to the estate on 08/08/2020 and was available for verification. The soil analysis test report was done for the estate by Genting Plantations Research Centre on 26/02/2015 (Test report No: SR05/2015) and submitted to the estate on 25/04/2015.</p> <p><u>Genting Landworthy Estate</u></p> <p>Plant Test Report (Tissue Sampling) was done for Genting Landworthy Estate by Genting Plantations Research Centre on 03/07/2020 (Test Report Number: PR33/2020. The report was issued to the estate on 08/08/2020 and was available for</p>	Complied

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		<p>verification. The soil analysis test report was done for the estate by Genting Plantations Research Centre on 26/02/2015 (Test report No: SR05/2015) and submitted to the estate on 25/04/2015.</p>																														
<p>7.4.3</p>	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.          - Minor compliance -</p>	<p>EFB was received from the Genting Tanjung Oil Mill and supplied to all the estates for mulching purpose at the replanting areas. Records of application were maintained by the respective estates and were applied in accordance with the SOP at 20 – 40 mt/ha. Sampled the records of application as below:</p> <p>Genting Bahagia Estate</p> <table border="1" data-bbox="1137 703 1928 954"> <thead> <tr> <th>Month</th> <th>Block</th> <th>Mt</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>Sept 2020</td> <td rowspan="4">42</td> <td>53.63</td> <td>2.68</td> </tr> <tr> <td>Oct 2020</td> <td>75.28</td> <td>3.76</td> </tr> <tr> <td>Dec 2020</td> <td>41.97</td> <td>2.10</td> </tr> <tr> <td>Jan 2021</td> <td>5.94</td> <td>0.30</td> </tr> </tbody> </table> <p>Landworthy Estate</p> <table border="1" data-bbox="1137 1050 1928 1300"> <thead> <tr> <th>Month</th> <th>Field</th> <th>Mt</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Jan 2021</td> <td>9</td> <td>177.98</td> </tr> <tr> <td>8</td> <td>40.99</td> </tr> <tr> <td>6</td> <td>287.1</td> </tr> <tr> <td>3</td> <td>202.04</td> </tr> </tbody> </table>	Month	Block	Mt	Ha	Sept 2020	42	53.63	2.68	Oct 2020	75.28	3.76	Dec 2020	41.97	2.10	Jan 2021	5.94	0.30	Month	Field	Mt	Jan 2021	9	177.98	8	40.99	6	287.1	3	202.04	<p>Complied</p>
Month	Block	Mt	Ha																													
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	6	287.1																														
	3	202.04																														
<p>7.4.4</p>	<p>Records of fertiliser inputs are maintained.          - Minor compliance -</p>	<p>Records of fertilisers input is maintained in Genting Plantations Research Centre Fertiliser Program 2021 for Genting Bahagia Estate and Genting Landworthy Estate, which have the information about</p>	<p>Complied</p>																													

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		type of fertiliser, quantity (bags and kg), dates of application and field number. Verification of records confirmed that the applied fertilisers were tally with the agronomist recommendation.																												
<b>Criterion 7.5</b>																														
Practices minimise and control erosion and degradation of soils.																														
7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>The soil series for both the estates comprises of the following among others 9 (Table Below). Soil maps were prepared by Genting Plantations Research Centre and available for verification. Slopes maps were available for both estates as well. The slope maps indicated that there are no areas above 25° within the estate.</p> <p>Genting Bahagia Estate</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Soil Type</th> <th>Area (Ha)</th> <th>Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>Buran</td> <td>1229.91</td> <td>32.26</td> </tr> <tr> <td>Jeram 3</td> <td>232.29</td> <td>6.09</td> </tr> <tr> <td>Jeram 4</td> <td>263.34</td> <td>6.91</td> </tr> <tr> <td>Jeram 5</td> <td>65.80</td> <td>1.73</td> </tr> </tbody> </table> <p>Genting Landworthy Estate</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Soil Type</th> <th>Area (Ha)</th> <th>Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>Talisai 4</td> <td>260.86</td> <td>6.46</td> </tr> <tr> <td>Inamam</td> <td>261.01</td> <td>6.05</td> </tr> <tr> <td>Kekura 3</td> <td>190.93</td> <td>4.73</td> </tr> </tbody> </table>	Soil Type	Area (Ha)	Percentage (%)	Buran	1229.91	32.26	Jeram 3	232.29	6.09	Jeram 4	263.34	6.91	Jeram 5	65.80	1.73	Soil Type	Area (Ha)	Percentage (%)	Talisai 4	260.86	6.46	Inamam	261.01	6.05	Kekura 3	190.93	4.73	Complied
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		Medang	229.32	5.68	
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	There was no observation of replanting on steep slopes at the sampled estates. Generally, the areas with slopes above 25 degrees were left unplanted and regeneration of plants growth was observed.			Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting at all the sampled estates.			Complied
<b>Criterion 7.6</b>					
Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.					
7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Not Applicable as there is no new planting in the certification unit.			Not Applicable
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Not Applicable as there is no new planting in the certification unit.			Not Applicable
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Not Applicable as there is no new planting in the certification unit.			Not Applicable
<b>Criterion 7.7</b>					
No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.					
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	Not applicable as no peat soil in this certification unit.			Not Applicable



	- Critical (Major) compliance -		
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p><b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	Not applicable as no peat soil in this certification unit.	Not Applicable
7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no peat soil in this certification unit.	Not Applicable
7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no peat soil in this certification unit.	Not Applicable
7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no peat soil in this certification unit.	Not Applicable

7.7.6	<p><b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no peat soil in this certification unit.	Not Applicable
7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no peat soil in this certification unit.	Not Applicable
<p><b>Criterion 7.8</b>  Practices maintain the quality and availability of surface and groundwater.</p>			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>7.8.1b Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>GTOM certification unit had its Water Management Plan for year 2020 which was developed in order to maintain the quality and availability of natural water resources by practicing efficient water consumption through various methods such as</p> <ul style="list-style-type: none"> <li>a) implementation of rain water harvest, construction of water gate for effective management of collection/main drain,</li> <li>b) establishment of <i>mucuna bracteata</i> to prevent erosion, side drain at field road to control water, frond stacking,</li> <li>c) Enhancement of ground vegetation at bare ground area.</li> </ul> <p>All estates received supply of piped treated water from own source (self-treatment) for the domestic consumption. There was rain harvest being practiced in the estates/mill. The general use of compound upkeep being initiated from the nearby water catchment.</p>	Complied

		Water from triple rinsing of pesticide containers was reused for spraying.													
7.8.2	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Referred to GPS map of Genting Region 2 Estate (Tenegang Group) River Water Sampling Point &amp; Riparian Area, shown that there are 5 rivers in the region. They are Sg. Tenegang Besar, Sg Layung Pisut, Sg. Ulu Tenegang, Sg. Kilangsat and Sg. Simpang Putih. Besides that there are water catchments in and around the estates under the certification unit and subsidiaries that lead to the mentioned rivers in the estates.</p> <p>Field visit to Genting Landworthy Estate along the tributary that leads to Sg. Tenegang Kecil which is not within the Certification unit land. Nevertheless the estate maintains a buffer zone along the river subsidiary where no operations such as chemical application or fertilizer is done. The buffer zones are well maintained with natural vegetation and there were no evidence of chemical application at the area.</p>	Complied												
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily. Genting Tanjung POM records the effluent monitoring for DOE submission in the 'Borang Penyata Suku Tahunan'. Details as follows;</p> <table border="1" data-bbox="1137 1225 1912 1351"> <thead> <tr> <th></th> <th>Parameter</th> <th>24/6/20</th> <th>11/7/20</th> <th>11/8/20</th> <th>29/9/20</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH value</td> <td>7.7</td> <td>8.5</td> <td>7.9</td> <td>8.4</td> </tr> </tbody> </table>		Parameter	24/6/20	11/7/20	11/8/20	29/9/20	1	pH value	7.7	8.5	7.9	8.4	Complied
	Parameter	24/6/20	11/7/20	11/8/20	29/9/20										
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		<table border="1"> <tr> <td>2</td> <td>BOD3</td> <td>12.8</td> <td>9.3</td> <td>12.5</td> <td>12.2</td> </tr> <tr> <td>3</td> <td>COD</td> <td>93</td> <td>106</td> <td>71</td> <td>241</td> </tr> <tr> <td>4</td> <td>AN</td> <td>ND(&lt;1)</td> <td>ND(&lt;1)</td> <td>ND(&lt;1)</td> <td>ND(&lt;1)</td> </tr> <tr> <td>5</td> <td>TN</td> <td>5.1</td> <td>3.8</td> <td>3.8</td> <td>9.8</td> </tr> <tr> <td>6</td> <td>O&amp;G</td> <td>ND(&lt;1)</td> <td>ND(&lt;2)</td> <td>ND(&lt;2)</td> <td>ND(&lt;2)</td> </tr> <tr> <td>7</td> <td>SS</td> <td>49</td> <td>ND(&lt;2)</td> <td>2.1</td> <td>6</td> </tr> </table> <p>The Mill license was for land application and the requirement is for the BOD to be less than 20mg/l. Effluent samples are analysed in KL-Kepong (Sabah) Sdn Bhd laboratory.</p>	2	BOD3	12.8	9.3	12.5	12.2	3	COD	93	106	71	241	4	AN	ND(<1)	ND(<1)	ND(<1)	ND(<1)	5	TN	5.1	3.8	3.8	9.8	6	O&G	ND(<1)	ND(<2)	ND(<2)	ND(<2)	7	SS	49	ND(<2)	2.1	6	
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7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Records of water consumption used for FFB processing are maintained. Ratio of 1.05 liter/tonne FFB recorded as to date for 2020 compared to 1.05 in 2019.	Complied																																				
<b>Criterion 7.9</b>																																							
Efficiency of fossil fuel use and the use of renewable energy is optimised																																							
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 -	<p>Comparatively diesel usage for 2020 is moving towards uptrend with the increase of diesel usage (up to Oct 2020: 183,800 liter vs todate 2019: 190,557 liter). This also related to the reduction FFB processed volume in 2020.</p> <p>Plan for efficiency of the use of fossil fuels and to optimise renewable documented as per below;</p> <table border="1"> <tr> <td></td> <td>Specific concern</td> <td>Management plan</td> </tr> </table>		Specific concern	Management plan	Complied																																	
	Specific concern	Management plan																																					

		1 Diesel usage	Monitor condition of engine/machines/tractors Maintain moving floor condition (minimize usage of shovel)													
		2 GHG emission	Reduce boiler stoppage and running in longer hours Cut-off unnecessary machine/load in non-processing hours													
<b>Criterion 7.10</b>																
Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.																
7.10.1	(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 -	An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. The 'Pollution Identification Environmental Improvement Action Plan' for 2020 – is used to identify the waste products and sources of pollution is in place and is being reviewed accordingly. The most significant environmental receptors for the estates and mill operations were:		Complied												
			<table border="1"> <thead> <tr> <th></th> <th>Receptors</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Emission from stack (smoke, soot, particulate), vehicle machine (smoke and gases), anaerobic process (GHG emission)</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Process and non-rocess water, ETP etc.</td> </tr> <tr> <td>3</td> <td>Land</td> <td>EFB @ biomass , SW and process/industrial waste</td> </tr> </tbody> </table>		Receptors	Source	1	Air	Emission from stack (smoke, soot, particulate), vehicle machine (smoke and gases), anaerobic process (GHG emission)	2	Water	Process and non-rocess water, ETP etc.	3	Land	EFB @ biomass , SW and process/industrial waste	
	Receptors	Source														
1	Air	Emission from stack (smoke, soot, particulate), vehicle machine (smoke and gases), anaerobic process (GHG emission)														
2	Water	Process and non-rocess water, ETP etc.														
3	Land	EFB @ biomass , SW and process/industrial waste														
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from	The Pollution Identification Environmental Improvement Action Plan' identifies the waste products / sources of pollution and		Complied												

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	<p>the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>actions taken to mitigate and reduce them.</p> <ul style="list-style-type: none"> <li>a) The main source of GHG from this operation is CO2 from fossil fuel combustion and NO2 from fertilizer applications.</li> <li>b) The reduction plan for minimizing NO2 emission is to replace straight fertilizers with compound fertilizers</li> <li>c) Reduction on tractor usage by implementing clusters harvesting and systematic evacuation. The structure cluster harvesting was verified.</li> </ul> <p>Green House Gaseous – Potential sources are being identified using 'Carbon Inventory Calculation Methodology. Emission Sources have been identified from Land Conservation, Fertilizer (mineral), Manufacture &amp; Transport, NO from fertilizer, Fuel Consumption, and reported in the Palm <b>GHG Summary Report</b></p>	
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Observed during field visit at block 8 (Landworthy Estate);</p> <ul style="list-style-type: none"> <li>i) Oil/lubricant containers were placed directly on the ground which lead to soil contamination. No proper waste storage area sighted.</li> <li>ii) Environmental mitigation at skid tank was not made available to reduce risk of pollution. Soil contamination was observed at nozzle/pump area.</li> <li>iii) Secondary containment was not available for the drum filled with diesel and placed directly on the ground.</li> <li>iv) Temporary workshop shed was built near to field drain. Workshop activities carried out at the area contaminating the ground soil where there was no concrete slab to mitigate pollution. Hence a major non-conformity was raised.</li> </ul>	Major Non compliance
<p><b>Criterion 7.11</b>          Fire is not used for preparing land and is prevented in the managed area</p>			

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7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	There was no land preparation in the Estates CU by burning ever since Genting Plantations practice zero burning as per the policy in the Zero Burning Policy dated 10/8/11 signed by the President & Chief Operating Officer. Therein stating 1. No open burning of any kind in all OU 2. All types of waste products disposed appropriately Limited open burning allowed for	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Standard Operating Procedure – Plantation Division was established for Fire Prevention and Control Measures; Doc Number: SOP-PD-12; Revision: 00; Issue Date: Oct 2020 to provide guidance to the estates on the prevention of fire and its management during the dry season and replanting stage if it occurs.  <u>Genting Bahagia Estate</u>  A Fire Prevention and Management Plan for Replanting Area and Dry Season 2020 was established in the Fire Prevention and Management, Genting Bahagia Estate available for verification.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	The fire prevention and control measures have been communicated with the adjacent stakeholders as below:  Genting Bahagia Estate – Internal Stakeholder Meeting conducted on 31/10/2020.  Genting Landworthy Estate – Internal Stakeholder Meeting conducted on 21/10/2019.	Complied

**Criterion 7.12**

Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

7.12.1	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	No development within Genting Tanjung POM certification unit.	Complied
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>7.12.2b Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b> Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>The CU had re-assessed to collate information relating to HCV. The assessment contained information of both planted area and relevant wider landscape-level, and result HCV identified. The inventory of the HCV sites was conducted in FY2010 by Dr Yap Son Kheong which covered all the Sabah region estates of Genting Plantations. Based on the findings of the assessment, the management and monitoring plan for HCV areas report dated 10th October 2014; High Conservation Value (HCV) areas have been identified such as forested area, river buffer zone, steep terrain, wildlife sanctuary in Genting Tenegang Group Estate. The following aspects areas were assessed as to their state and management.</p> <ul style="list-style-type: none"> <li>a) Area of HCV-Shared management of forest reserve and boundary areas/buffer zones</li> <li>b) The presence of large mammals and birds and how they are protected from poaches.</li> <li>c) IPM: use of plants to attract parasitoids to control bagworms &amp; barn owls for rats management and success</li> <li>d) Drainage and the conditions. Determining the presence of fishes as a bio-indicator of water health</li> </ul>	Complied
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		



7.12.4	<p>(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).</p> <p>- Critical (Major) compliance -</p>	<p>No new planting after 15 November 2018 within Genting Tanjung POM certification unit</p>	Complied
7.12.5	<p>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.</p> <p>- Minor compliance -</p>	<p>No local communities have been identified in HCV areas within Genting Tanjung POM certification unit. Thus, this indicator is not applicable</p>	Not Applicable
7.12.6	<p>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.</p> <p>- Minor compliance -</p>	<p>The RTE assessment was incorporated in the HCV report and evaluation. Therein providing wildlife database categories of;</p> <ul style="list-style-type: none"> <li>a) Birds / Mammals</li> <li>b) Herpetofauna / Conservation status</li> <li>c) List of offences and penalties under Wildlife Conservation Act 2010.</li> <li>d) Provocation of wildlife.</li> </ul> <p>In records there is no RTE species observed/spotted within the member estates in CU. Relevant action plans had been established and implemented concerning protection of the riparian, such as identification on map and ground, restriction of no chemicals activities, awareness training to workers and patrolling by Auxiliary Police.</p>	Complied

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7.12.7	<p>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.</p> <p>- Minor compliance -</p>	<p>Outcomes of monitoring (HCV monitoring &amp; RTE sighting checklist) are monitored on monthly basis. HCV management and monitoring plan date 4<sup>th</sup> June 2020 is referred to. Monitoring at identified area (HCV 1 &amp; 4: Forest area at block 62 &amp; 63 and Division 5 &amp; 8: HCV 4)</p> <p>January: 21/1/21            February: 26/2/21            March: 9/3/21</p>	Complied
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>No land clearing since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Genting Tanjung POM certification unit. Thus, this indicator is not available.</p>	Complied

**Appendix B: Approved Time Bound Plan**

**Table 1: Initial Timebound Plan and Summary of RSPO Certification Status**

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP certification for	Status as of March 2021	Any unresolved non-compliances
1	Genting Plantations (WM) Sdn Bhd & Setiamas Sdn Bhd(100%)for estates  Genting Oil Mill Sdn Bhd (100%) for mill	Genting Sri Gading Estate,	Supply base for Genting Ayer Item Oil Mill, Johor, Malaysia	Dec,2014	Certified	None
2		Genting Sungei Rayat Estate,				
3		Genting Kulai Besar Estate,				
4		Genting Tanah Merah Estate,		Dec,2015		
5		Genting Tebong Estate,		July, 2015		
6	Genting Plantations (WM) Sdn Bhd (100%)for estate	Genting Selama Estate, Kedah, Malaysia		July 2019	Certified	None
7	Genting Oil Mills (Sabah) Sdn Bhd (100%) for Mill  Genting Plantations Berhad ( Estate)	Genting Sabapalm Estate, Sabah, Malaysia	Supply base for Genting Sabapalm Oil Mill, Sabah, Malaysia	Aug,2015	Certified	None
8	Genting Tanjung Bahagia Sdn Bhd ( 100%) for estates	Genting Tanjung Estate, Sabah, Malaysia	Supply base for Genting Tanjung Oil Mill, Sabah, Malaysia	Aug,2016	Certified	None
9		Genting Tenegang Estate, Sabah, Malaysia				

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10	Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Layang Estate, Sabah, Malaysia				
11		Genting Bahagia Estate,				
12	Landworthy Sdn Bhd (84%)	Genting Landworthy Estate, Sabah, Malaysia				
13	Genting Tanjung Bahagia Sdn Bhd (100%) for estates	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah Oil Mill, Sabah, Malaysia	July,2021		Concept Note for RACP re-submitted to RSPO in Feb 2021.
14	Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Permai Estate, Sabah, Malaysia				
15		Genting Kencana Estate, Sabah, Malaysia				
16	Genting Oil Mills (Sabah) Sdn Bhd (100%) for estate and mill	Genting Jambongan Estate, Sabah, Malaysia	Supply base for Genting Jambongan Oil Mill, Sabah, Malaysia	Sept 2019	Certified	None
17	Genting Plantations Bhd Wawasan Land Progress Sdn Bhd (100%) Genting Oil Mills (Sabah) ( Mill)	Genting Sekong Estate, Sabah, Malaysia	Supply base for Genting Trushidup Oil Mill, Sabah, Malaysia	Sept,2017	Certified	None
18	Asiaticom Sdn Bhd ( 100%) Sawit Sukau Usahasama Sdn Bhd(56%)	Genting Suan Lamba Estate, Sabah, Malaysia				

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19	PT Sepanjang Intisurya Mulia (70%)	Mulia 1 & 2 Mulia 3 & 4 Mulia 5 & 6	Supply base for Mulia Oil Mill, Kalimantan, Indonesia	Oct, 2017	Certified	None
20	PT Sawit Mitra Abadi (70%)	Abadi 1 & 2 Abadi 3 & 4				
21	PT Sepanjang Intisurya Mulia (70%)	Area 199 Ha Area 100 Ha Area 1300 Ha	Supply base for Mulia Oil Mill, Kalimantan, Indonesia	Oct,2023		In Process of NPP In Process of NPP In process of obtaining HGU.
22	PT Sawit Mitra Abadi (70%)	Area 1000 Ha				NPP Process In process of obtaining HGU. HCS Report completed peer review.
23	Genting Plantations Berhad (100%)Estate  Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Mewah Estate, Sabah, Malaysia	Supply base for Genting Mewah Oil Mill,Sabah, Malaysia	Mar,2017	Certified	None
24	Genting Plantations (WM) Sdn Bhd (100%)	Genting Bukit Sembilan Estate, Kedah, Malaysia		July,2017	Certified	None

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25	PT Globalindo Agung Lestari (60%)	Lamunti Barat Estate Lamunti Timur Estate I & II Mangkatip Estate I & II Bakuta Estate Plasma Timur & Barat	Supply base for Globalindo Oil Mill, Kalimantan, Indonesia	Mac, 2022		HCSA Report for PT GAL is currently under peer review.  NPP for PT UAI in progress. In the process of obtaining HGU for UAI. HCSA Report completed and waiting for peer review.
26	PT United Agro Indonesia(60%)	PT UAI 1 & 2 UAI Plasma		Oct, 2023		
27	PT Susantri Permai (95%)	Puroh Estate Masaha Estate Zircon Hill Estate	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia	Oct, 2022		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		SP Plasma		Oct, 2023		
28	PT Kapuas Maju Jaya (95%)	Waterfall Estate I & II Muhun Estate I & II Talawang Estate I & II	Supply bases for Golden Hill Oil Mill, Kalimantan Indonesia	Oct,2022		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		KMJ Plasma		Oct, 2023		
29	PT Dwie Warna Karya ( 95%)	Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate		Oct , 2022		In the process of obtaining Forest Release and Forest

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		DWK Plasma		Oct, 2023		Exchange prior to HGU application.
30	PT Citra Sawit Cemerlang (70%)	CSC Estates	Supply base for Mulia Oil Mill	Oct,2021		In process of obtaining HGU. HCSA report completed review.
31	PT Surya Agro Palma (70%)	SAP Estate 1&2 SAP Estate 3&4 SAP Estate 5&6	Supply base for Mulia Oil Mill	Sept, 2022		In process of obtaining HGU. HCSA report completed review.
32	PT Agro Abadi Cemerlang (70%)	AAC 1 & 2				In process of obtaining HGU HCSA report completed review. Report not published yet.
		AAC 3 & 4				
33	PT Palma Agro Lestari Jaya (70%)	PALJ Estates	Supply base for PALJ Oil Mill*	Aug,2023		In process of obtaining HGU. HCSA report completed review.
		PALJ Plasma				
34	Knowledge One Investment Pte Ltd ( 85%)-PT Kharisma Inti Usaha ( KIU)	KIU 1 & 2 KIU 3 & 4	Supply base for KIU Oil Mill	July,2022		NPP in progress. HCV report approved by HCVRN. HCSA report is completed and waiting for peer review.
		KIU Plasma		July 2022		

**Note:** The above time-bound plan is subject to revision and changes by top management. If any change is made, the Certification Body will be notified before the next audit.

\*Oil Mill planned for construction

**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2019** for **Genting Tanjung 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 datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **[2019]** for **[Genting Tanjung Palm Oil Mill]** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	2.32
PK	2.32

Extraction	%
OER	20.74
KER	5.01

Production	t/yr
FFB Process	367,023.08
CPO Produced	76,110.48
PK Produced	18380.23

Land Use	Ha
OP Planted Area	16,947.77
OP Planted on peat	0
Conservation (forested)	499.04
Conservation (non-forested)	0
<b>Total</b>	<b>17,446.81</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	295,193.80	0.99	0	0	0	0	295,193.80	0.99
CO <sub>2</sub> Emission from fertilizer	11,029.91	0.04	0	0	0	0	11,029.91	0.04
NO <sub>2</sub> Emission	8,051.60	0.03	0	0	0	0	8,051.60	0.03
Fuel Consumption	5,935.10	0.02	0	0	0	0	5,935.10	0.02
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-158,647.58	-0.53	0	0	0	0	-158,647.58	-0.53



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Conservation Sequestration	-45,76.20	-0.02	0	0	0	0	-4,576.20	-0.02
<b>Total</b>	<b>156,986.64</b>	<b>9.26</b>	<b>0</b>	<b>0</b>	<b>35,351.04</b>	<b>0</b>	<b>192,337.67</b>	<b>9.26</b>

\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	51,650.54	0.14
Fuel Consumption	594.54	0.00
Grid Electricity Utilization	4690.05	0.01
<b>Credit</b>		
Export of Grid Electricity	-2,414.17	-0.01
Sales of PKS	-27,934.61	-0.08
Sales of EFB	0.00	0.00
<b>Total</b>	<b>26586.36</b>	<b>0.07</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

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

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

**Appendix D: Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	Nov 2019	22,192.10	6,161.86	28,353.96
2	Dec 2019	25,656.63	5,717.89	31,374.52
3	Jan 2020	19,118.70	5,797.66	24,916.36
4	Feb 2020	19,401.76	4,985.02	24,386.78
5	Mar 2020	15,103.12	3,848.60	18,951.72
6	Apr 2020	18,269.70	4,787.06	23,056.76
7	May 2020	23,536.83	6,424.70	29,961.53
8	June 2020	24,085.50	6,294.10	30,379.60
9	July 2020	23,543.62	4,387.47	27,931.09
10	Aug 2020	25,459.00	6,471.16	31,930.16
11	Sept 2020	28,709.27	7,438.96	36,148.23
12	Oct 2020	27,252.01	5,512.11	32,764.12
13	Nov 2020	23,752.53	5184.55	28,937.08
14	Dec 2020	22,037.66	4,563.57	26,601.23
15	Jan 2021	14,306.32	3,024.63	17,330.95
16	Feb 2021	13,151.32	2,164.79	15,316.11
	<b>Total</b>	<b>345,576.07</b>	<b>82,764.13</b>	<b>428,340.20</b>
<b>Note:</b>				

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	Nov 2019	4,626.388	1,088.186
2	Dec 2019	5,222.467	1,144.709
3	Jan 2020	3,817.276	975.540
4	Feb 2020	3,982.994	1,028.509
5	Mar 2020	3,168.961	747.879
6	Apr 2020	3,842.564	940.106
7	May 2020	4,829.218	1,189.165
8	June 2020	4,705.243	1,081.674
9	July 2020	4,743.695	1,168.703
10	Aug 2020	5,095.922	1,278.769

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11	Sept 2020	5,724.926	1,469.708
12	Oct 2020	5,353.533	1,295.950
13	Nov 2020	4,723.666	1,114.535
14	Dec 2020	4,386.775	1,040.056
15	Jan 2021	2,544.726	670.082
16	Feb 2021	2,588.089	664.248
	Total	<b>69,356.45</b>	<b>16,897.82</b>
<b>Note:</b>			

<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	W	RSPO_PO1000000153	997.74	-
2	X	RSPO_PO1000005763	1,801.96	-
3	Y	RSPO_PO1000001517	-	11,757.01
4	Z	RSPO_PO1000006525	-	2,925.96
	Total		2,799.7	14,682.97
<b>Note:</b>				

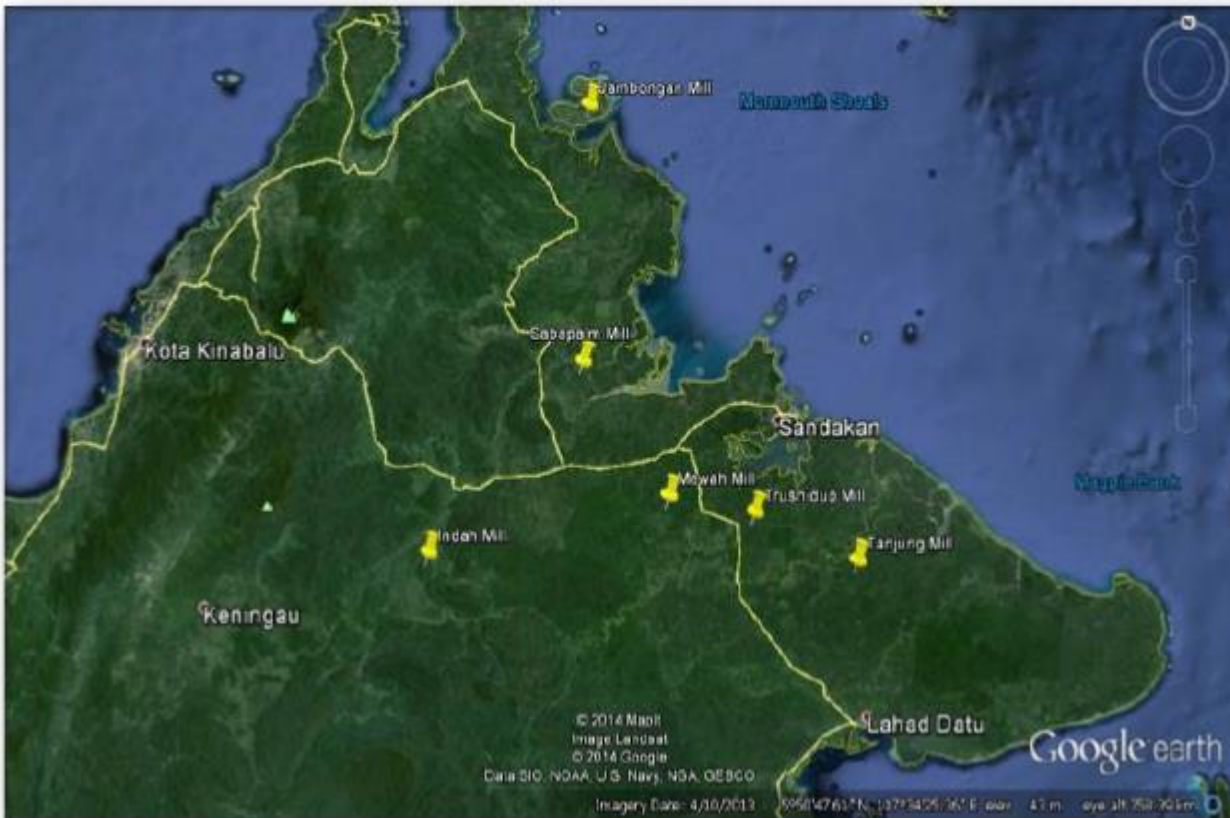
<b>D. Records of CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	A	ISCC	57,369.00	0
	Total		57,369.00	0
<b>Note:</b>				

<b>E. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	A	958.17	-	
2	B	-	1,802.78	
	Total	958.17	1,802.78	
<b>Note:</b>				

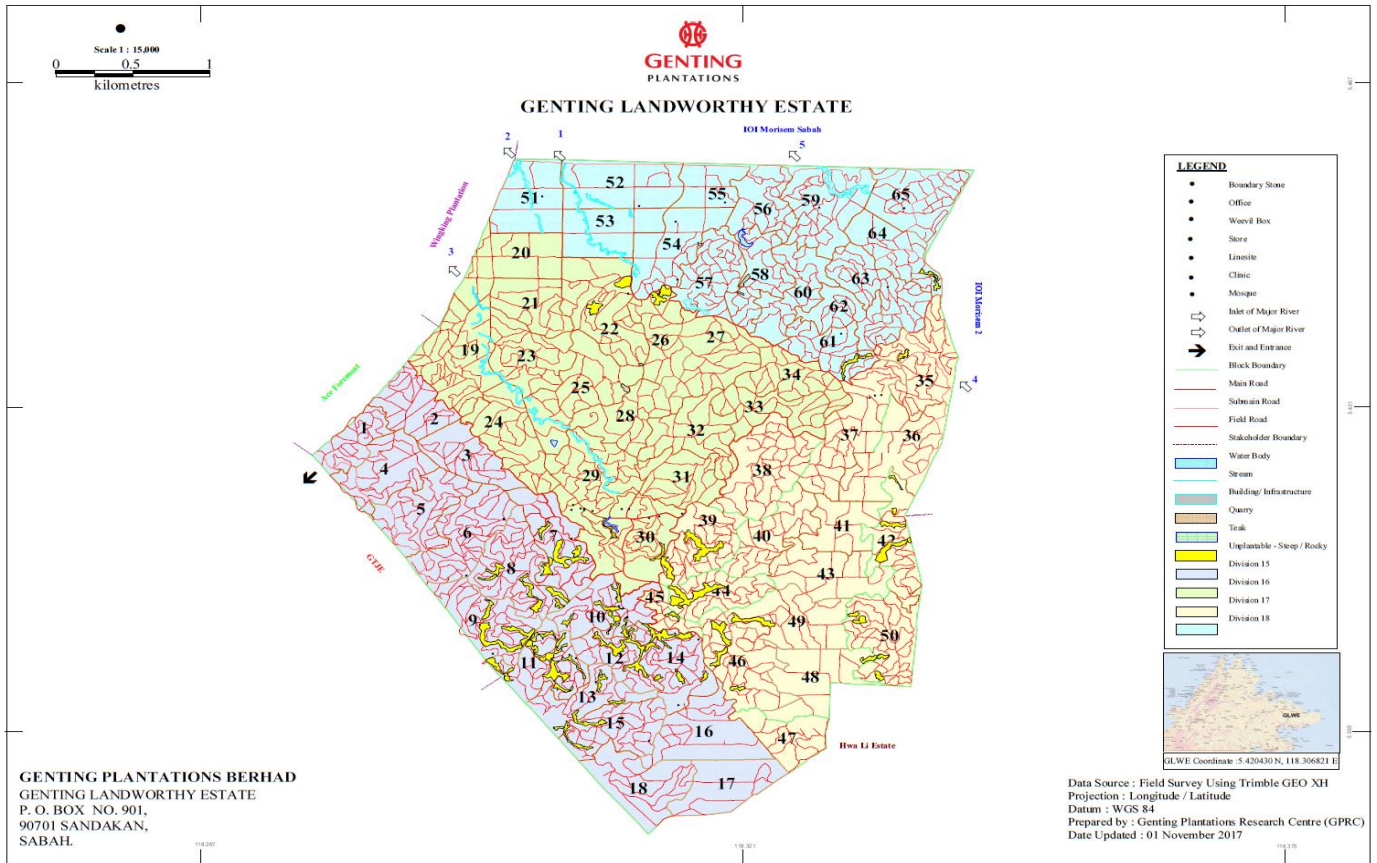
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F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil		
<b>Note:</b>			

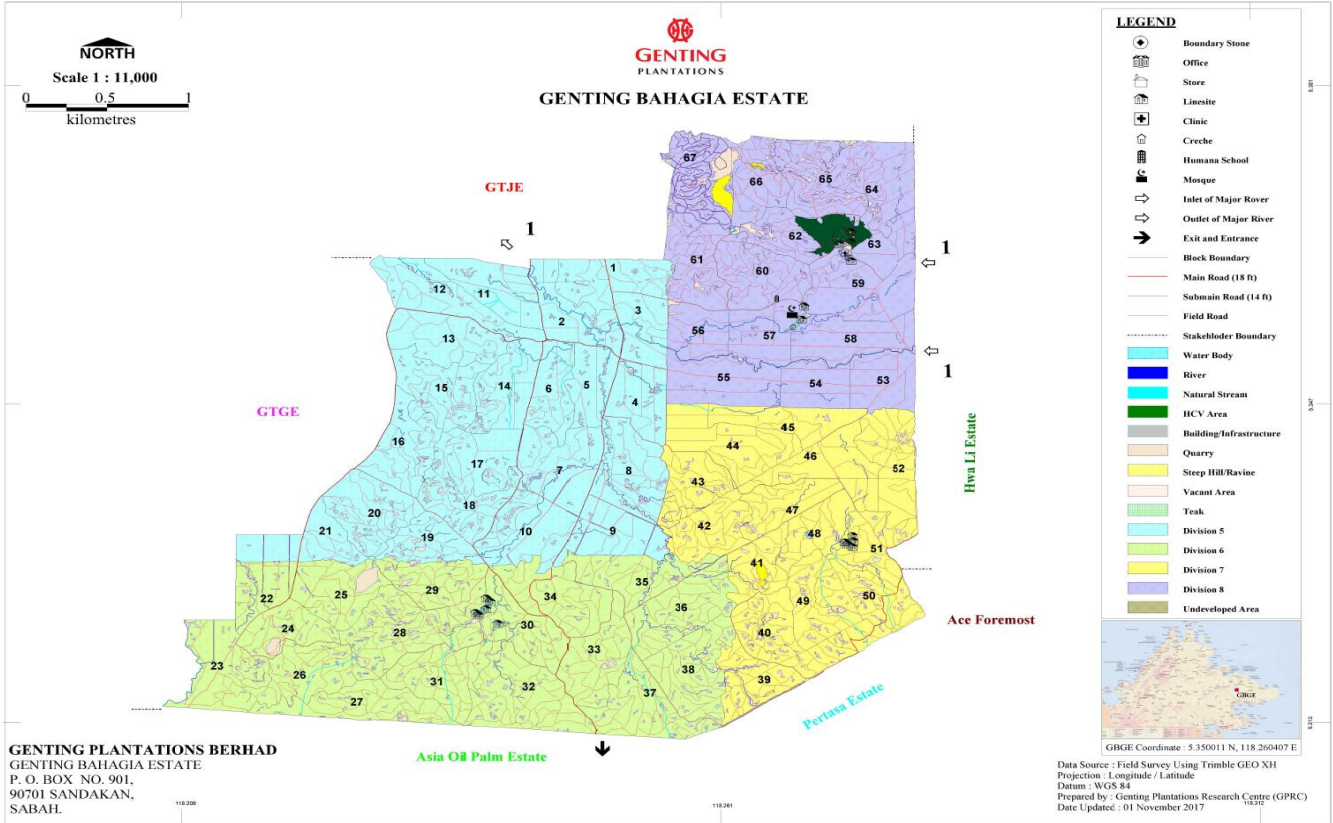
**Appendix E: Location Map of Certification Unit and Supply bases**



**Appendix F: Genting Landworthy and Genting Bahagia Field Map**



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**Appendix G: List of Smallholder Sampled**

*Not Applicable*

## Appendix H: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
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