PF441 RSPO Public Summary Report Revision 6 (December / 2017)

### RSPO PRINCIPLE AND CRITERIA – 1<sup>st</sup> Annual Surveillance Assessment (ASA1) Public Summary Report

Genting	Plantations	Berhad

**Client company Address:** 10<sup>th</sup> Floor, Wisma Genting Jalan Sultan Ismail 50250 Kuala Lumpur Malaysia

#### **Certification Unit:**

**Genting Bukit Sembilan Estate** 

**Location of Certification Unit:** 

09300 Kuala Ketil, Kedah, Malaysia

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### Section 1: Scope of the Certification Assessment

1. Company Details					
RSPO Membership Number	1-0086-06-000-00	Membership14/11/2006Approval Date14/11/2006		14/11/2006	
Parent Company Name	Genting Plantations Berhad				
Address	Head office : 10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia				
Subsidiary (Certification Unit Name)	Genting Plantations (WM) Sdn Bhd				
Address	Certification unit : Genting Bukit Sembilan Estate 09300 Kuala Ketil, Kedah, Malaysia				
Contact Name	Mr. Tan Cheng Huat (Senior Vice President – Plantation Division)				
Website	http://www.gentingplantations.cE-mailchenghuat.tan@genting.comom				
Telephone	+603 2333 6510 (Head office) +607 7631 992 (Estate)	Facsimile	+603 23	333 6575	

2. Certification Information					
Certificate Number	RSPO 673953	Date of First Certification	18/09/2017		
		Certificate Start Date	18/09/2017		
		Certificate Expiry Date	17/09/2022		
Scope of Certification	Production of fresh fruit bunches				
Applicable Standards	RSPO P&C 2013 (MYNI-2014)				

3. Other Certifications						
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date			
EU-ISCC-Cert-DE119- 60186938	ISCC EU	ASG Cert GmbH	05/06/2019			
ISCC-Plus-Cert-60186938	ISCC PLUS	ASG Cert GmbH	05/06/2019			

4. Location(s) of Mill & Supply Bases					
Name	Lesstion [Man Deference #]	GPS Coordinates			
(Mill / Supply Base)	Location [Map Reference #]	Latitude	Longitude		
Genting Bukit Sembilan Estate (GBSE – Main Division)	09300 Kuala Ketil, Kedah, Malaysia	5° 34′ 35.04″ N	100° 41′ 9.57″ E		



Genting Bukit Sembilan 09300 Kuala Ketil, Kedah, Malaysia Estaet – Paya Kamunting Division (PKD)	6° 18′ 19.41″ N	100° 25′ 15.87″ E
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5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Bukit Sembilan Estate	1,181.39	0.14	52.62	1,234.15	95.72
Pemark: Peduce of total planted and total area due to requisition 27.58 ha by government for sport					

Remark: Reduce of total planted and total area due to requisition 27.58 ha by government for sport complex.

6. Pla	6. Plantings & Cycle						
	Age (Years)						
Estate	Immature 0 - 3	Young >3-7	Prime 1 >7-15	Prime 2 >15-20	Past Prime >20-25	Mature	Immature
Genting Bukit Sembilan Estate	11.19	0	66.64	536.38	567.18	1170.20	11.19

7. Certified Tonnage of FFB (Own Certified Scope)					
Fatata	Tonnage / year				
Estate	Estimated (July 17 – June 18)	Actual (July 17 – June 18)	Forecast (Sept 18 – Aug 19)		
Genting Bukit Sembilan Estate	26,540.00	25,883.44	26,420.00		

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *					
Estate	Tonnage / year				
Estate	Estimated (July 17 – June 18)	Forecast (Sept 18 – Aug 19)			
	N/A N/A N/A				
Total					

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9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable					
Independent FFB	Tonnage / year				
Supplier	Estimated (July 17 – June 18)	Actual (July 17 – June 18)	Forecast (Sept 18 – Aug 19)		
	N/A	N/A	N/A		
Total					

10. Certified Tonnage						
	Estimated (July 17 – June 18)	Actual (July 17 – June 18)	Forecast (Sept 18 – Aug 19)			
Mill Capacity:	FFB	FFB	FFB			
N/A	26,540.00 mt	25,883.44 mt	26,420.00 mt			
SCC Model:	CPO (OER: %)	CPO (OER: %)	CPO (OER: %)			
N/A	N/A	N/A	N/A			
	PK (KER: %)	PK (KER: %)	PK (KER: %)			
	N/A	N/A	N/A			

\*Volume Extension

11. Actual Sold Volume (CPO)						
RSPO Certified		Other Schemes Certified		Conventional	Total	
	KSFO Cei tineu	ISCC	RSB			
CPO (MT)	N/A	N/A	N/A	N/A	N/A	

12. Actual Sold Volume (PK)					
RSPO Certified		Other Schemes Certified		Conventional	Total
	KSFO Cel tilled	ISCC	RSB	Conventional	Total
PK (MT)	N/A	N/A	N/A	N/A	N/A

13. Actual Group certification Claims				
	Credit	Physical Volume (MT)		
IS-CSPO	N/A	N/A		
IS-CSPKO	N/A	N/A		
IS-CSPKE	N/A	N/A		

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

#### **Certification Body:**

BSI Services Malaysia Sdn Bhd, (ASI Accreditation Number: RSPO-ACC-067) Unit 3, Level 10, Tower A The Vertical Business Suites, Bangsar South No. 8, Jalan Kerinchi 59200 Kuala Lumpur Tel +603 2242 4211 Fax +603 2242 4218 Nicholas Cheong: <u>Nicholas.Cheong@bsigroup.com</u> www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (RSPO-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Singapore, Jakarta, Bangkok and Australia which involve in RSPO Certification Program.

#### 2.1 Assessment Methodology, Programme, Site Visits

The on-site annual surveillance assessment was conducted on 26/07/2018. The approach to the audit was to treat the estate as an RSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The audit programmes are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criterias 2013 (MYNI-2014) was used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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 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

Assess	Assessment Program						
(Mill )	Name Supply	y Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Genting Estate	Bukit	Sembilan	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$

#### Tentative Date of Next Visit: June 25, 2019

#### Total No. of Mandays: 3.0 mandays

#### 2.2 BSI Assessment Team:

Team Member Name	Role	<b>Qualifications</b> (Short description of the team members)
Hu Ning Shing	Lead auditor	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 of social. She is fluent in Bahasa Malaysia and English languages.
Nicholas Cheong	Team member	He holds Master of Environmental Management from the University Putra Malaysia in year 2008 and Bachelor of Science (Food Science) from Charles Sturt University Australiain year 2014. He has more than 5 years of working experience in

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Mohamed Hidhir Zainal Abidin	Team member	sustainability auditing and carbon emissions accounting. He has also 2 years of working experience in wastewater treatment construction and operations. He has completed the ISO9001, ISO14001, RSPO P&C Lead Auditor and RSPO SCC Lead Auditor course and MSPO Awareness Training. In his previous certification body experience, he was the Lead Assessor for Clean Development Mechanism, World Commission of Dam and ISCC. The CDM and WCD assessment focuses on social accountability. He had been involved in Sustainable Palm Oil auditing for more than 2 years. Able to speak in English. 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.

### **Accompanying Persons:**

No.	Name	Role
1	Ronnie Tan	Observer
2	Chen Hui Ling	Observer

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#### 2.3 Assessment Plan

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

PRELIMINARY AGENDA					
Date	Time	Subjects	HNS	МН	NC
Wednesday 25/7/2018	PM	Audit team travelling to hotel	$\checkmark$	$\checkmark$	V
Thursday 26/7/201808.30 - 09.00Opening Meeting: • Opening Presentation by Audit tear 		<ul> <li>Opening Presentation by Audit team leader</li> <li>Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation)</li> </ul>	V	V	V
	09.00 - 12.00	<b>Genting Bukit Sembilan 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	V	V	V
	10.00 - 11.00	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc)	$\checkmark$	-	-
	12.00 – 13.00	Lunch	$\checkmark$	$\checkmark$	V
	13.00 – 16.30	<b>Genting Bukit Sembilan Estate</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc)	V	V	V
	16.30 -	Prepare for closing meeting	$\checkmark$	$\checkmark$	√
	17.00 -	Closing	$\checkmark$	$\checkmark$	$\checkmark$

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

#### **3.1 Details of audit results are provided in the following Appendix:**

⊠ Genting Plantations Berhad Time Bound Plan

⊠ RSPO P&C 2013 Generic Checklist

#### 3.2 Progress against Time Bound Plan

Time Bound Plan				
Requirement	Remarks	Compliance		
Summary of the Time Bound I	Plan			
Does the plan include all subsidiaries, estates and mills?	All subsidiaries, estates, mills and refinery (existing operations and yet to be constructed) except those estates (landholdings) planned to be developed into property development (West Malaysia)	Yes		
Have all the estates and mills certified within five years after obtaining RSPO membership?	The first oil mill and its supply bases were certified in 2015.	Yes		
Is the time bound plan challenging? • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law.	The TBP is challenging due to progressive development, location of the estates and mills. ISPO and MSPO are mandatory requirements in Indonesia and Malaysia, thus the Sustainability team is also focusing on the implementation and compliance. This TBP is made more challenging due to the announcement by RSPO below.	Yes		
Have there been any changes since the last audit? Are they justified?	On 12 October 2017, RSPO issued a clarification on Criterion 2.1 (http://mailchi.mp/rspo/rspostatement- on-hak-guna-usaha-hgu-indonesia- 805113?e=17587afb24), which requires plantations and mills to comply with all applicable local, national and ratified international laws and regulations Pursuant to this, which was effective as of 12 October 2017, RSPO members must have a legitimate right to cultivate ( <i>Hak Guna Usaha</i> or a <b>HGU</b> ) and IUP in order to secure the RSPO certificates. As of Feb 2018, only 2 PTs in Indonesia have obtained the HGU. The rest are in process of applying for the HGU process, the company will revise this TBP according to the issuance of the HGU.	Yes		



If there have been changes, what circumstances have occurred?	As explained above.	Yes
Have there been any stakeholder comments?	To-date, no comments received from stakeholders on the TBP.	Yes
Have there been any newly acquired subsidiaries?	No new acquisition as of 31 July 2018	Yes
If yes, have the newly acquisitions certified within a three-year timeframe?	N/A	N/A
Have there been any isolated lapses in implementation of the plan?	No lapses however re-scheduling of the certification dates has been made.	Yes
Un-Certified Units or Holdings	5	
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Yes	Yes
<ul> <li>No replacement after dates defined in NIs Criterion 7.3:</li> <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>	<ul> <li><u>Sabah</u></li> <li>1.Genting Kencana Estate – LUCA passed, Concept Note for Remediation and Compensation submitted to Panel. Awaiting for approval of Concept Note to develop the Remediation and Compensation Plan.</li> <li>2.Genting Jambongan Estate – Concept Note and Remediation Plan has been submitted to RSPO. RSPO allowed for Genting Jambongan to proceed with its certification programme.</li> <li><u>Indonesia</u></li> <li>1. PT SISM – LUCA passed. Concept Note and Remediation Plan submitted and approved by Panel.</li> <li>Action plan to be checked by auditor during the next audit.</li> <li>2. The 4<sup>th</sup> operating unit included there by RSPO is for PT Globalindo Agung Lestari ( PT GAL). They have submitted LUCA for PT GAL under " Non- Commercial Clearance" as asked by the Secretariat during that time. Non Commercial Clearance do not carry compensation liability to the company. At the moment, RSPO Secretariat haven't completed the review of this LUCA for PT GAL.</li> </ul>	Yes
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	NPP for PT PALJ, PT AAC, PT UAI, PT Sawit Mitra Abadi, PT KIU is in progress.	Yes



Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.	http://www.rspo.org/members/complaints/status- of-complaints/view/38 (Complaints officially closed on 31 October 2016)	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	None	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	http://www.rspo.org/members/complaints/status- of-complaints/view/104	Yes
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Yes	Yes

#### 3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

Progress of scheme smallholders or outgrowers towards compliance with relevant standards

	Requirement	Remarks	Compliance
outgr stand	100% of scheme holders and/or scheme rowers comply with the lard within three years of hill's initial certification?	N/A	N/A

#### 3.4 Details of findings

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

During the 1<sup>st</sup> Annual Surveillance Assessment there were two (2) Major & two (2) Minor nonconformities raised. The Genting Bukit Sembilan Estate unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Summary of Total Number of Nonconformity				
Nonconformity				
NCR Ref #	1657689-701806-M1		Indicator 2.1.1 Major	
Date Issued	26/07/2018	Due Date	23/10/2018	
Closed (Yes/No)	Yes	Date of nonconformity closure	6/9/2018	
Statement of Nonconformity	Evidence of compliance with re implemented.	levant legal requirements wa	as not effectively	
<b>Requirement Reference</b>	Evidence of compliance with releva	ant legal requirements shall be	e available.	
<b>Objective Evidence</b>	Referring to Workers Minimum Housing and Amenities Act 1990, section 19 (3): employer responsibility to appoint VMO for clinic visit once every 2 weeks @ fortnightly. Based on contract dated 1/1/18, under para 3.0 VMO visit is once a month.			
Corrections	New addendum will be inserted in the contract agreement where the VMO will be required to visit the clinic once every 2 weeks as per the Workers Minimum Housing and Amenities Act 1990.			
Root Cause Analysis	The visit frequency was monitored/implemented as per the groups standard contract agreement which has been the practice for so many years, and failed to cross check this requirement/compliance against the LRR.			
Corrective Action	To review and revise all the other existing contract agreement to comply with the legal requirements and LRR.			
Assessment ConclusionThe estate management has amended and contract agreement which has included th 1/8/2018 which signed by the VMO. Beside the visit was carried out on 18/8/2018 and The corrective action was effectively close system breakdown was very minimal. Con verified in the next assessment.		uded the frequency of visit to D. Besides, VMO visit book was 2018 and 28/8/2018. Ply closed on 6/9/18 by offsite	twice a month on s sighted where due to the risk of	

Summary of Total Number of Nonconformity					
Nonconformity	Nonconformity				
NCR Ref #	1652689-201806-M2	Clause & Category (Major/Minor)	Indicator 6.5.2 Major		
Date Issued	26/07/2018	Due Date	23/10/2018		
Closed (Yes/No)	Yes	Date of nonconformity closure	6/9/2018		
Statement of Nonconformity	Implementation of the employment contract was not completely effective.				
Requirement Reference	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.				

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Sampled workers found that they were not signed on the new addendum of employment contract dated 21/3/2018 as below: a. Employee No.: 01089 b. Employee No.: 02415 **Objective Evidence** c. Employee No.: 02462 d. Employee No.: 02469 Besides, the watchman (Employee No.: 02548) that recruited on March 2018 has yet to sign the employment contract. 1. Addendum for all the missed out workers were signed and acknowledged by the workers. A copy was given to each worker while another copy was filed. Corrections 2. The watchman (Employee No.: 02548) had signed and acknowledged the contract agreement. A copy was given to him while another copy was filed. Latest addendum was issued only for foreign workers, while local workers was left out from the process due to the misunderstanding/miscommunication between the office clerk and field staff. **Root Cause Analysis** Employment contract agreement for the watchman was omitted by the office. To ensure all the legal and sustainability requirements are conveyed and communicated effectively throughout the entire management levels. Follow up on the implementation also will be scrutinized closely by the **Corrective Action** management. Sustainability team to check and ensure the addendum & employment agreement requirements are complied during the Sustainability Internal Audit. The major non-conformance was carried out offsite due to the risk was low whereby total number of workers sampled was 16 and 1 out of 16 workers were not complied. The percentage of not complying is 6.25% which the evidence submitted can effectively close offsite. A copied of latest addendum which has been signed and acknowledged by the workers and an employment contract was signed by the watchman. Besides, internal audit was carried out by the Sustainability Team on 22/8/2018 to ensure Assessment Conclusion the compliance of requirements. Manager of Sustainability also carried out training to brief on the Social Management Procedure and Procedure on Recruitment of Foreign Workers to ensure the personnel on the ground understood the process. Training records dated 22/8/2018 were sighted. The corrective action was effectively closed on 6/9/18 by offsite due to the risk of system breakdown was very minimal. Continuous implemented will be further verified in the next assessment.

Summary of Total Number	er of Nonconformity		
Nonconformity			
NCR Ref #	1652689-201806-N1	Clause & Category (Major/Minor)	Indicator 5.2.4 Minor
Date Issued	26/07/2018	Due Date	Next surveillance assessment
Closed (Yes/No)	No	Date of nonconformity closure	N/A
Statement of Nonconformity	The management plan did not mo	nitor the ongoing status of the	e HCV.
Requirement Reference	<ul> <li>Where a management plan has been created there shall be ongoing monitoring:</li> <li>The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>Outcomes of monitoring shall be fed back into the management plan.</li> </ul>		
	HCV monitoring checklist has bee and RTE according to the recom monitoring includes present of the ensure all signage are in good cor	mendation of the HCV assest e wildlife, encroachment, prot	sment report. The
Objective Evidence	The last monitoring was conducted on 26/06/2018 for Bukit Sembilan main division. The outcome of the monitoring was reviewed with the Estate Managers.		
	The monitoring results is reflective to the management plan.		
	However, the management plan did not consider appropriate management prescriptions for HCV 1.4 and those species that are using the area for critical feeding, nesting/ roosting sites, pathways or contains saltlicks. Recommendation by the HCV assessor – Dr Yap Son Kheong:		
<b>6</b>	As the area is now determined boundary markings, the protective the estate control. As such it will stated in the HCV report. Bein characteristics for HCV originally of	out of the estate area with s e status of the site as a HCV i have to be excluded from the ng isolated and reduced to	s not longer under HCV list originally only 0.14ha, the
Corrections	Estate's corrective action: To reclassify the site as conservat by estate into the forest strip.	ion and ensure no encroachme	ent, no hunting etc
	To amend the HCV report, HCV m accordingly.		d HCV checklist
Root Cause AnalysisComments by the HCV assessor – Dr Yap Son Kheong: The status of the HCV has changed due to the changes in area/ status of the forest strip at OP95C being reduced to only 0.14ha 2009) and also isolated from other areas with tree cover.			
	This is expected as land use changes would not be permanent if these sites are outside the control of the estate.		
Corrective Action	Relook and reassess all the HCV a ago.		-
Assessment Conclusion	Corrections and corrective actions accepted. Evidence and effectiveness of CAP will be verified in the next audit.		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1652689-201806-N2	Clause & Category (Major/Minor)	Indicator 5.4.1 Minor
Date Issued	26/07/2018	Due Date	Next surveillance assessment
Closed (Yes/No)	No	Date of nonconformity closure	N/A
Statement of Nonconformity	The management plan was not e meet the fossil fuels usage efficie		anges required to
Requirement Reference	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy shall be in place and monitored.		
Objective Evidence	Management plan has been established to improve the efficiency of the fossil fuel usage. However, the management plan dated 25/07/2018 did not consider a change of plan or further improvement identification since the diesel usage for the first 6 months of 2018 is 1.52l per ton of FFB as compared to year 2017.		
Corrections	A more realistic management plan will be addressed based on the year to year FFB forecast.		
Root Cause Analysis	Diesel usage for the first 6 months of 2018 is higher compared to year 2017 is mainly due to a big drop in a FFB production. This has adverse effect on the high Litre/Mt consumption which was reflected on the estate crop production.		
Corrective Action	Will keep a close monitoring of the crop trend. Management plan will be revised accordingly and target of the diesel consumtion based on more realistic figures.		
Assessment Conclusion	Corrections and corrective actions accepted. Evidence and effectiveness of CAP will be verified in the next audit.		

	Opportunity for Improvements		
OFI #	OFI # Description		
OFI 1	NIL		

Positive Findings			
PF #	PF # Description		
PF 1	<b>1</b> Good commitment from the management toward the certification.		
PF 2	2 Easily retrieval of documents and records during the audit.		

### 3.4.1 Status of Nonconformities Previously Identified and Observations

Summary of Total Number of Nonconformity					
Nonconformity	Nonconformity				
NCR Ref #	1502868-201707-M1 Clause & Category Major (Major/Minor) Indicato		Major Indicator 5.1.1		
Closed (Yes/No)	Yes Date of nonconformity 24/07/2017				
Statement of Nonconformity	The operation of the dumpsite environmental impact assessment		identified in the		
<b>Requirement Reference</b>	An environmental impact assessm	ent (EIA) shall be documented			
<b>Objective Evidence</b>	The environment aspect and impa not cover the operation of the dur		.1 July 2017 did		
Corrective Action	Landfill operation was identified as 'main' activity in the EAI as it can have an impact on the environment. The aspects and impacts of the landfill operation were updated accordingly in the Environmental Aspect and Impact (EAI) assessment register (dated 21st July 2017). Operations and activities covered in the EAI will be monitored against operations on the ground to ensure no areas are missed out in the assessment.				
Assessment Conclusion	are missed out in the assessment.The CAP has been submitted on 24/7/2017. Due to the nature of the major only involving the updates of the Environmental Aspect and Impact (EAI) assessment register, therefore the closure of the major conducted offsite.It has been confirmed that the issue has been fully addressed hence the Major NC was closed on 24/7/2017.Verification during ASA1 by NC: During this assessment, there are no other activities that was identified to be required to be included in the EAI. Interview with the Assistant Manager confirmed that he understood that any changes or new activities that will impact the environment shall be assessed.Based on the understanding of the Assistant Manager, the finding is remained closed.				

Opportunity for Improvement				
OFI#	# Description			
OFI 1	NIL			

#### 3.4.2 Summary of the Nonconformities and Status

CAR Ref.	CATEGORY (MAJOR/ MINOR)	ISSUED	STATUS & DATE (Closure)
1502868-201707-M1 - 5.1.1	Major	13/07/2017	Closed out on 24/07/2017
1652689-201806-M1	Major	26/07/2018	Closed out on 6/9/2018
1652689-201806-M2	Major	26/07/2018	Closed out on 6/9/2018

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1652689-201806-N1	Minor	26/07/2018	"Open"
1652689-201806-N2	Minor	26/07/2018	"Open"

#### 3.5. Stakeholders 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 Bukit Sembilan Estatee's environmental and social performance, legal and any known dispute issues.

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

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

List of Stakeholders Contacted			
Internal Stakeholders Union/Contractors/Local Communities			
Workers' Representative	Squatters		
Women's Representative	Contractors		
Government Departments	NGO		
nil	nil		

IS #	Description
1	Issues:
	Squatter - He informed that the company wanted to take back the land where he is staying for more than
	50 years which he felt unsatisfied. Apart from that, he has good relationship with the management.
	Management Responses:
	Verified with the management confirmed that the management did not plan to take back the land, they
	just want to outline an agreement with the squatter with terms and conditions to be added.
	Audit Team Findings:
	Document verified the meeting minutes where a negotiation meeting was conducted on 13/7/2018 with
	the squatter. The result of the issue has yet to be finalized where it is awaiting instruction from top
	management. This will be verified during next assessment.
2	Issues:
	Gender Committee Representatives – There was no sexual harassment nor violence case reported so far.
	They have carried out meeting once every 6 months to discuss if there is any issue.
	Management Responses:
	The management will continue to monitor if there is any issue.

	Audit Team Findings:
	No other issue.
3	<b>Issues:</b> Workers' Representatives – They informed that they were treated equally without any discrimination. They are tendering their passport voluntarily and they are allowed to take back the passport whenever they want. Their salary have achieved Minimum Wage Order 2016.
	Management Responses: The management will ensure that they will comply with the legal requirement and treats all the workers equally.
	Audit Team Findings:
	No other issue.
4	<b>Issues:</b> Contractors – The payment was made promptly and they have good relationship with the management. They are aware and understood of the complaint procedure.
	Management Responses:
	The management will ensure the payment will be made accordingly.
	Audit Team Findings:
	No further issue.

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

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Genting Bukit Sembilan Estate complied with the RSPO P&C MYNI (2014) audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Genting Bukit Sembilan Estate is continued.

Report prepared by	Acceptance of Assessment Conclusion
Name:	Name:
Ms Hu Ning Shing	Mr. Tan Cheng Huat
Company Name:	Company Name:
BSI Services Malaysia Sdn Bhd	Genting Plantations Berhad
Title:	Title:
Lead auditor	Senior Vice President – Plantation (Malaysia)
Signature:	Signature:
high)	fun
	(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)
Date: 5/12/2018	Date: 5/12/2018

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### **Appendix A: Summary of Findings**

Criterion /	/ Indicator	Assessment Findings	Compliance
Principle 1	1: Commitment to Transparency		
Criterion 1			
Growers an	d millers provide adequate information to	relevant stakeholders on environmental, social and legal is	ssues relevant to
		allow for effective participation in decision making.	
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Genting Plantations Berhad has issued a list of documents that can be accessed by stakeholders to all the stakeholders during stakeholder meeting or by posting to the stakeholders. The documents that can be accessed includes all the policies, SEIA report and the management plan, complaint & grievances procedure. Interviews with the stakeholders such as contractor, local communities and internal workers has confirmed that they are aware of it and understood that they have the riders to participate in the docision making.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	the rights to participate in the decision making. Genting Plantations Berhad has developed Procedures on Request and Responses, Doc. No. SMP-GPB-25 dated 14/8/2014 revision 0. The procedure has defined the process to respond to the information requested by stakeholders and the responsibilities and actions by management for the process. The stakeholders can request during meeting, via phone, email or write in, walk in. All the requests will be recorded in the Enquiry Register Book. The time frame to acknowledge and respond to the request is within 7 working days upon receiving the request from stakeholders. Verified the Enquiry Register Book found that request letters from the stakeholders were pasted in the book. For eg: A stakeholder has requested the management to borrow the tractor to pull his lorry that stuck inside the plantation on 22/6/2018. The manager has approved.	Complied

Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.

There shall be a written policy Centing Plantations Berbad has developed Ethical		/ Indicator	Assessment Findings	Compliance
Criteria 1.3:         Showers and millers commit to ethical conduct in all business operations and transactions.         .3.1         There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.       Genting Plantations Berhad has developed Ethical Conduct and Integrity Policy dated 22/6/2015. The company is committed to conduct its business ethically and with integrity at all times. The following values need to be followed by all the employees: <ul> <li>Respect for fair conduct of business</li> <li>Respect and protect confidential and/ or privileged information to which we have access in the course of our duties</li> <li>The policy was displayed at the notice board in the office area. Briefing of the policy was conducted on 9/3/2018 and during induction training for the new workers. Seen the training records such as training attendance list and</li> </ul>	.2.1	<ul> <li>include, but are not necessary limited to:</li> <li>Land titles/user rights (Criterion 2.2);</li> <li>Occupational health and safety plans (Criterion 4.7);</li> <li>Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</li> <li>HCV documentation (Criteria 5.2 and 7.3);</li> <li>Pollution prevention and reduction plans (Criterion 5.6);</li> <li>Details of complaints and grievances (Criterion 6.3);</li> <li>Negotiation procedures (Criterion 6.4);</li> <li>Continual improvement plans (Criterion 8.1);</li> <li>Public summary of certification assessment report;</li> </ul>	stakeholders to request information such as policies, SEIA reports and management plans, audit reports, pollution reduction plans, complaint & grievances procedure, FPIC procedure. The stakeholders will have required to fill in the Enquiry Register Book in order to access to the documents. Sustainability Report and Annual Report will be publicly available in the website:	Complied
<ul> <li>committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</li> <li>-Minor compliance</li> <li>Conduct and Integrity Policy dated 22/6/2015. The company is committed to conduct its business ethically and with integrity at all times. The following values need to be followed by all the employees:         <ul> <li>Respect for fair conduct of business</li> <li>Refrain from all forms of corruption, bribery and fraudulent use of funds and resources</li> <li>Respect and protect confidential and/ or privileged information to which we have access in the course of our duties</li> </ul> </li> <li>The policy was displayed at the notice board in the office area. Briefing of the policy was conducted on 9/3/2018 and during induction training for the new workers. Seen the training records such as training attendance list and</li> </ul>		,		
<ul> <li>committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</li> <li>-Minor compliance</li> <li>Conduct and Integrity Policy dated 22/6/2015. The company is committed to conduct its business ethically and with integrity at all times. The following values need to be followed by all the employees:         <ul> <li>Respect for fair conduct of business</li> <li>Refrain from all forms of corruption, bribery and fraudulent use of funds and resources</li> <li>Respect and protect confidential and/ or privileged information to which we have access in the course of our duties</li> </ul> </li> <li>The policy was displayed at the notice board in the office area. Briefing of the policy was conducted on 9/3/2018 and during induction training for the new workers. Seen the training records such as training attendance list and</li> </ul>	Criteria 1.	- Major compliance –		
Principle 2: Compliance with applicable laws and regulations		- Major compliance – <b>3:</b> d millers commit to ethical conduct in all		

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Criterion	/ Indicator	Assessment Findings	Compliance
		Assessment Findings	Compliance
2.1.1	Evidence of compliance with relevant legal requirements shall be available. - Major compliance -	<ul> <li>GBSE had continued to comply with applicable law and regulation is monitored by the operating units and sustainability team. GBSE had obtained and renewed license and permits as required by the law. List of license and permit sighted onsite: <ul> <li>i) MPOB License: 508758102000 valid from 01 June 2018 to 31 May 2019 (main division); 508759002000 valid from 1<sup>st</sup> June 2018 to 31<sup>st</sup> May 2019 (Paya Kamunting Division)</li> <li>ii) Permit to buy diesel, Serial no. K020136, ref. no. : KPDNKK. BLG(SK) 01/2014, approved quantity: 5,500 litre. Permit is valid from 26<sup>th</sup> February 2018 until 27<sup>th</sup> February 2019.</li> <li>iii) Weighbridge stamping/calibration: serial no. 172050259, stamping ref. KSP-ATK 015457 (40 mt AVERY ZM305) and valid until 9/10/18.</li> <li>iv) Weighbridge stamping/calibration: serial no. 104550239, stamping ref. KSP-ATK 040916 (40 mt AVERY B110) and valid until 8/12/18.</li> <li>v) Air compressor certificate: KD PMT 4993 valid till 22 April 2019 and KD PMT 4621 valid till 21 September 2018.</li> <li>v) Fire Arms/ Weapon Permit and ammunition license,</li> </ul></li></ul>	Major nonconformance
		ref. no.:280992 , serial no. BLG.786 valid till 8 <sup>th</sup> September 2018. Workers minimum housing amenities Act 1990, section 19 (3); employer responsibility to appoint VMO for clinic visit once every 2 week @ fortnightly. Based on contract dated 1/1/18, under para 3.0 VMO visit the estate is once a month. Thus, major NC was raised. List of applicable legal documented under LRR @ legal	
		requirement register, SMP-GPB-22. The list of legal requirements are available by the sustainability team for reference when it is required.	
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	List of applicable legal documented under LRR @ legal requirement register, SMP-GPB-22. The latest revision of register, rev: 6 dated 28 <sup>th</sup> May 2018 was made available for verification.	Complied
		The Procedure on regional, national and international Laws (doc: SMP-GPB-21) described the mechanism of tracking the changes of laws is contained in the legal requirements register.	

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Criterion	/ Indicator	Assessment Findings	Compliance	
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	As described in the Procedure on regional, national and international Laws (doc: SMP-GPB-21; revision 1; issue on 14 Aug 2014), mechanism of tracking the changes of laws is contained in the legal requirements register.	Complied	
		The internal audit checklist was reviewed and it contained the criteria to audit the legal compliance that is applicable to the company.		
		The person responsible- chief clerk responsible for update the legal requirements register file and disseminate the changes by notice to the respective manage, assistant manager and decisional assistant managers. Refer to letter for appointment dated 26/5/17 for the PIC for updating changes in laws.		
		If the operating unit's current operation does not comply with the new or amended legislation and other requirements, the estate manager shall be briefed to establish and implement new management programmes and/or operation controls. The estate updates the list of relevant laws and regulations that are required to maintain various legal		
		permits.		
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	Genting Plantations Berhad has established a documented procedures on regional, national and international law (SMP-GPB-21; dated 14th Aug 2014) for tracking any changes in the law. For the changes of laws, the company will refer to as below: a. Notification of changes from various source of information b. Monitoring for changes in the Law c. Clarification and review on the changes d. Updating of the Legal register administered internally e. Notification to the operating units and/or the relevant person in charge	Complied	
		Currently, the person/team responsible for monitoring the changes and communicating in estate is Chief Clerk as the assistant manager appointed on 26 May 2017. Latest communication on legal update was done on 29/3/16 pertaining to social and include Passport Act 1966. The new Employee Insurance System Bill 2017 has yet to be updated in the register. Currently, it still pending for approval from System and Matters Department, HQ and to be distributed in August 2018. Verified the implementation of EIS effective in the month of January 2018.		

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.

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Criterion /	/ Indicator	Assessment Findings	Compliance
2.2.1	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	<ul> <li>The land grant for Paya Kamunting was verified. The lands are registered under Asiatic Plantation (WM) Sdn Bhd. Asiatic is a subsidiary of Genting Plantations.</li> <li>Sample of land grant verified: <ol> <li>GRN 197658 15.34ha (for rubber plantation)</li> <li>GRN 197660 76.97ha (for rubber plantation)</li> <li>GRN 199826 379.3ha (for rubber plantation)</li> </ol> </li> <li>The grants are attached with proper demarcated maps issued by the state authorities.</li> </ul>	Complied
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	The land boundaries are observed onsite and it was confirmed from the surrounding smallholders that there were not land conflicts.	Complied
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no land dispute in the Genting Bukit Sembilan Estate at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations (WM) Sdn Bhd and land ownership documents verified.	Complied
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute in the Genting Bukit Sembilan Estate at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations (WM) Sdn Bhd and land ownership documents verified.	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute in the Genting Bukit Sembilan Estate at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations (WM) Sdn Bhd and land ownership documents verified.	Complied
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land dispute in the Genting Bukit Sembilan Estate at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations (WM) Sdn Bhd and land ownership documents verified.	Complied
Criterion 2 Use of the linformed co	and for oil palm does not diminish the lea	gal rights, customary or user right of other users without th	eir free, prior and
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	There is no land dispute in the Genting Bukit Sembilan Estate at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations (WM) Sdn Bhd and land ownership documents verified.	Complied

Criterion	/ Indicator	Assessment Findings	Compliance
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for 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 company's title, concession or lease on the land. - Minor compliance -	Assessment Findings There is no land dispute in the Genting Bukit Sembilan Estate at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations (WM) Sdn Bhd and land ownership documents verified.	Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	There is no land dispute in the Genting Bukit Sembilan Estate at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations (WM) Sdn Bhd and land ownership documents verified.	Complied
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	There is no land dispute in the Genting Bukit Sembilan Estate at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations (WM) Sdn Bhd and land ownership documents verified.	Complied
Principle 3	3: Commitment to long-term econor 3.1:	nic and financial viability	
There is an	implemented management plan that aim	s to achieve long-term economic and financial viability.	
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	Business management plan was established. The Budget for 2018 had been verified by the assessor.	Complied

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Critorion	/ Indicator	Accordment Findings	Compliance
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	Assessment FindingsThere is no replanting happened in Paya Kamunting. The projection for the replanting is available from 2019-2023.The breakdown of the replanting as a below:YearHa2019103.742020117.58202183.02202299.56202381.38	Complied
Principle 4 Criterion 4	4: Use of appropriate best practices	by growers and millers	
		, consistently implemented and monitored.	
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	Similar as per previous assessment, At Genting Bukit Sembilan Estate, the Sustainability Management Procedure Manual, Standard Operating Procedures (SOP) and The Oil Palm Manual (latest update on 30/8/13) were established. The manual covering the activity for replanting, oil palm nursery practices, planting techniques, soil conservation and terracing, pest and diseases, weed management, manuring of oil palm, immaturity, harvesting, crop forecasting and managing difficult soils. All of the activities have been described comprehensively in the Standard operating procedure (SOP) and pictorial SOP. All the estate implemented through its daily operations. The procedure for Occupational Health and Safety has been established and implemented. Sighted the procedure for Accident investigation, PTW, PPE, workshop, harvesting, manuring, pest & disease were available during the assessment. The procedure for mechanization was established and available at estate office. Sighted the procedure, namely Group Plantation Advisory dated 16/4/2013: 1. Structured Cluster Harvesting : MECH-01	Complied
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	<ol> <li>Mechanically Assisted Collection (MAC): MECH-02</li> <li>Buffalo Assisted Collection (BAC):MECH-03A</li> <li>Buffalo Training: MECH-03B</li> <li>Buffalo Selection and Haulage: MECH-03C</li> <li>Agronomist from GPRD inspect and report on the operations on annual basis. There were other audits by carried out by SHO and Sustainability Team to ensure compliance against company policy and procedure with regards to operation, safety, health and welfare requirements.</li> </ol>	Complied

Criterion /	/ Indicator	Assessment Findings	Compliance
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	Annual agronomist visit was carried out last year on 28- 29/9/17 by GPRC department, Tebong. A few issues identified form the visit related to crop production (bunch set formation), crop management/field maintenance and low yielding field. The latest census for Site Yield Potential (SYP) was done on May 2018 for both Paya Kamunting and Main Division of GBSE. BSD: SYP increase of 7% to 42% PKD: SYP increase of 28%	Complied
		Combined RSPO and MSPO internal audit was last carried out on 20-22/6/18 (main division) and 28-29/6/18 (PKD division) by Sustainability Team. Total of 12 major NC raised and verification on the closure was done on 24/7/18. All NC have been closed satisfactorily. Annual SHO audit was done on 25/4/18 by Genting Group SHO, registration JKKP IS 127/438/2/3246.	
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	Not applicable. GBSE is a standalone estate without mill.	Not applicable
Criterion 4		improve coil fortility to a level that ensures entired and ou	stained viold
4.2.1	Aintain soil fertility at, or where possible There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	<ul> <li>improve soil fertility to, a level that ensures optimal and sus</li> <li>GBSE continuously implement practices good agricultural practices as guided in their SOPs (Oil Palm Manual, dated 30/8/2013). They are followed to manage the soil fertility to levels ensuring optimal and sustainable yields.</li> <li>One of the SOP procedures, OPM 7: Manuring of Oil Palm is referred for managing soil fertility. It includes sections on :</li> <li>a) Introduction</li> <li>b) Nursery manuring</li> <li>c) Field Manuring</li> <li>d) Application of Fertiliser</li> <li>e) Fertiliser delivery and Stock Reports for estates</li> <li>f) Fertiliser sampling for analysis</li> <li>g) Manuring Schedule</li> <li>h) Method of application for younger and mature palms</li> </ul>	Complied

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2.2.2       Records of fertiliser inputs shall be minor compliance -       Fertilizers are applied as per agronomist recommendation. Record shows application date, filed number, dosage applicators.       Complied         2.1.2       Minor compliance -       2017 Fertilizer Programme by Genting Plantations Research Centre (GPRC) dated 28-29/9/17 was sighted. The recommended fertilizer and total tonnage as follow: ERP: 108.70 mt BR: 46.50 mt AC: 249.5 mt MOP: 162.50 mt AC: 145.50 mt AC: 249.5 mt MOP: 162.50 mt AC: 145.50 mt AC: 249.5 mt MOP: 162.50 mt AC: 145.50 mt AC: 145.50 mt AC: 145.50 mt AC: 145.50 mt AC: 145.50 mt AC: 145.50 mt       Som the evidence of application as per the following:         2.2.3       There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -       The agronomist from GPRC will visit the estate and conduct the samplieg on annual basis. Based on Soil Sampling Procedure dated 1/12/17, the frequency of analysis is every 5 years. The last soil sampling was carried out on June 2014, refer to report SR15/2014 dated 30/8/14.       Complied         2.2.4       A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Painn Oli Mill Effluent (POME), and pain residues after replanting. - Minor compliance -       Based on SOP Manual, OPM 7: Manuring of Oil Pain, the nutrient strategy includes the use of Empty Fruit Bunches (EFB) distributed in the field to improve the soil structure as well as to improve the s	Criterion /	/ Indicator	Assessment	Findings			Compliance	
2.3       There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status.       The agronomist from GPRC will visit the estate and conduct the sampling on annual basis. Based on Soil sampling to monitor changes in nutrient status.       The agronomist from GPRC will visit the estate and conduct the sampling vas carried out on June 2014, refer to report SR15/2014 dated 30/8/14.       Complied         2.2.4       A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB) plan Oil Mill Effuent (PMR), and paim residues after replanting.       The latest foliar analysis report (PR17/2018) dated 20/3/18 was sighted.       Complied         2.2.4       A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Plan Oil Mill Effuent (PMR), and paim residues after replanting.       Based on SOP Manual, OPM 7: Manuring of Oil Planh, the sectore soil mathematic status.       Complied mathematic status.         .2.4       A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Plan Oil Mill Effuent (PMR), and paim residues after replanting.       Based on SOP Manual, OPM 7: Manuring of Oil Planh, the mathematic strategy includes the use of Empty Fruit Bunches (EFB), Plan Oil Mill Effuent (PMR), and paim residues after replanting.       Complied Stratematic Recommend Remarks and plank residues after replanting.       Complied North Remarks and plank residues after replanting.       Complied Recommen Remarks and plank residues after replanting.       Complied Recommen Remarks and plank residues after replanting.       Complied Recommen Remarks and plank residues nutre round.       Complied Recommen Remark	4.2.2	Records of fertiliser inputs shall be maintained.	Fertilizers recommendat number, dosa	are applied ion. Record s ige applied pe	shows applic	ation date, filed		
2.3       There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status.       The agronomist from GPRC will visit the estate and conduct the sampling on annual basis. Based on Soil Sampling to monitor changes in nutrient status.       The agronomist from GPRC will visit the estate and conduct the sampling on annual basis. Based on Soil Sampling to monitor changes in nutrient status.       The agronomist from GPRC will visit the estate and conduct the sampling on annual basis. Based on Soil Sampling to monitor changes in nutrient status.       The agronomist from GPRC will visit the estate and conduct the sampling on annual basis. Based on Soil Sampling Procedure dated 1/12/17, the frequency of analysis is every 5 years. The last soil sampling was carried out on June 2014, refer to report SR15/2014 dated 30/8/14.       Complied         .2.4       A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.       Based on SOP Manual, OPM 7: Manuring of Oil Palm, the nutrient strategy includes the use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.       Based on SOP Manual, OPM 7: Manuring of Oil Palm, the nutrient strategy includes the use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.       Complied         . Minor compliance -       Bukit 5,126.6       Structure as well as to improve the organic matter. Recommendation per round is 25 mt (main division) and PKD is 40 mt per round.       Complied         . Minor compliance -       Bukit 5,126.6       Structure as of May around.       To date palpication as of May around aso of			Research Cen The recomme ERP: 108.70 r BR: 46.50 mt AC: 249.5 mt MOP: 162.50	tre (GPRC) da nded fertilizen nt mt	ated 28-29/9,	17 was sighted.		
2.3       There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status.       The agronomist from GPRC will visit the estate and conduct the sampling nonanual basis. Based on Soil Sampling Procedure dated 1/12/17, the frequency of analysis is every 5 years. The last soil sampling was carried out on June 2014, refer to report SR15/2014 dated 30/8/14.       Complied         .2.4       A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.       Based on SOP Manual, OPM 7: Manuring of Oil Palm, the nutrient strategy includes the use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.       Complied         .2.4       A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.       Based on SOP Manual, OPM 7: Manuring of Oil Palm, the nutrient strategy includes the use of Empty Fruit Bunches (EFB) distributed in the field to improve the soil structure as well as to improve the soil Mill Effluent (POME), and palm residues after replanting.       Complied         .2.4       M inor compliance -       Division       Applied       Recommen       Remarks         .2.4       M nutrient strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.       Complied         .2.4       M nutrient strategy includes the use of Empty Fruit Bunches (EFB) distributed in the field to improve the soil Bastructure as well as to improve the soil Bastruc			in April 2018. for ERP appli	The program	me started i	n February 2018		
2.3       There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -       The agronomist from GPRC will visit the estate and conduct the sampling on annual basis. Based on Soil Sampling Procedure dated 1/12/17, the frequency of analysis is every 5 years. The last soil sampling was carried out on June 2014, refer to report SR15/2014 dated 30/8/14.       Complied         .2.4       A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -       Based on SOP Manual, OPM 7: Manuring of Oil Palm, the nutrient strategy includes the use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -       Complied       Complied         Division       Applied       Recommen       Remarks dation       Complied         Division       Applied       Recommen       Remarks       Complied					applied			
MOP       April 2018       85.05 mt         .2.3       There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -       The agronomist from GPRC will visit the estate and conduct the sampling on annual basis. Based on Soil Sampling Procedure dated 1/12/17, the frequency of analysis is every 5 years. The last soil sampling was carried out on June 2014, refer to report SR15/2014 dated 30/8/14.       Complied         .2.4       A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -       Based on SOP Manual, OPM 7: Manuring of Oil Palm, the nutrient strategy includes the use of Empty Fruit Bunches (EFB) distributed in the field to improve the soil structure as well as to improve the organic matter. Recommendation per round.       Complied         Division       Applied tonnage       Recommen dation Paya       Recommen Adation To date application as of May				2018		325.47 ha		
tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -conduct the sampling on annual basis. Based on Soil Sampling Procedure dated 1/12/17, the frequency of analysis is every 5 years. The last soil sampling was carried out on June 2014, refer to report SR15/2014 dated 30/8/14.Complied.2.4A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -Based on SOP Manual, OPM 7: Manuring of Oil Palm, the nutrient strategy includes the use of Empty Fruit Bunches (EFB) distributed in the field to improve the soil structure as well as to improve the organic matter. Recommendation per round.CompliedDivisionApplied tonnage dationRecommen dation dationCompliedDivisionApplied tonnage dationRecommen application application as of MayComplied								
and the samples were sent to GPRC Laboratory for analysis. Foliar analysis report (PR17/2018) dated 20/3/18 was sighted2.4A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -Based on SOP Manual, OPM 7: Manuring of Oil Palm, the nutrient strategy includes the use of Empty Fruit Bunches (EFB) distributed in the field to improve the soil structure as well as to improve the organic matter. Recommendation per round is 25 mt (main division) and PKD is 40 mt per round.CompliedDivisionApplied tonnage dationRecommen dationRemarks application as of May	4.2.3	tissue and soil sampling to monitor changes in nutrient status.	conduct the s Sampling Pro analysis is ev carried out o	conduct the sampling on annual basis. Based on Soil Sampling Procedure dated 1/12/17, the frequency of analysis is every 5 years. The last soil sampling was carried out on June 2014, refer to report SR15/2014				
in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -			and the sam analysis. Fol 20/3/18 was s	ples were se iar analysis sighted.	ent to GPRC report (PR:	Laboratory for 17/2018) dated		
tonnagedationBukit5,126.625 mt perTo dateSembilanmtroundapplicationPaya47.08 mt40 mt peras of May	4.2.4	in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.	nutrient stra Bunches (EFB structure as Recommenda	tegy includes ) distributed i well as to in tion per round	s the use on the field to mprove the	of Empty Fruit improve the soil organic matter.	Complied	
SembilanmtroundapplicationPaya47.08 mt40 mtperas ofMay			Division		dation			
			Sembilan	mt	round	application		
Criterion 4.3:			Paya Kamunting	47.08 mt	40 mt pe round			

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Criterion /	/ Indicator	Assessment Fir	ndings		Compliance
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Soil series map available for both estates visited. Sighted the type of soil available at GBSE:			Complied
		Soil Series	Percentage/Hectare	Division	
		Telemong- Akob-Local Alluvium	5.87% (29.46 ha)	Paya Kamunting Division	
		Munchong- Seremban	92.16% (462.44 ha)	Division	
		Urban Land	9.87% (1.97 ha)		
		Malacca	8.57% (69.98 ha)	Main	
		Gajah Mati Kuah	3.43% (27.99 ha)	Division	
		Melaka-Tavy-	8.62% ( 70.43 ha) 79.38% (648.48 ha)	-	
			il map, there is no oth		
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	problem soils found in GBSE and its divisions. The estate will refer to the following procedures for guidance a) OPM 4 : Soil conservation and terracing (rev 2013) b) Steep land Management SMP –GPB-10			Complied
		Soil maps and slo	pe maps were sighted at	t GBSE.	
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	The road maintenance programme was established to cover the road patching and road grading activities. The monthly road maintenance programme was sighted Main Division: PKD:			Complied
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	No peat of problematic/fragile soil at GBSE			Complied
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	No peat of problematic/fragile soil at GBSE			Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	No peat of problematic/fragile soil at GBSE			Complied

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4.4.1	An implemented water management plan shall be in place.	Water manage available for ve	ement plan dated rification. The plan l	23/3/18 was made has included:	Complied
	- Minor compliance -		Action Plan	Status/remarks	
		Source of water	Government treated water	Installation completed	
			Water collection pond – irrigation project at P00C (16ha)	Completed in July 2018.	
		Efficiency use of water	- Residential area (pipe leakages) - Optimize usage and reduce wastage - Education and training	Daily basis	
		Renewability of water source	Rain water harvesting	On-going	
		Avoidance of surface and	Septic tank repairs	On-going	
		ground water contaminati on	Collection of rubbish at line site - 3 times per week - location of landfill (>100m from waterways and line site)	Daily basis	
			Drainage system maintenance and repair	On-going	
			Chemical mix bay sump/recycling	On-going	
			Water quality – 6 monthly water analysis (OP 05/94C1 and OP 05/96A ) Follow INWQS and Std B	On-going	
			Protecting of water course and land – maintaining riparian buffer along waterways	On-going	
		Other (flood/water logging area)	Monitoring of rain fall	On-going	

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Criterion /	/ Indicator	Assessment Finding	js	Compliance
		Monitoring of water usage – as at May 2018, total of 23,483 m3 of water consumed for domestic (office and line site)		
4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines)	Documented under GPB's Sustainability Management Procedure Manual, SMP-GPB-14, rev:1 dated 1/8/14, riparian buffer zones established in lined with DID Guidelines for Rivers and River Reserves Peninsular Malaysia (2001) as per the following:		Complied
	shall be demonstrated.	River width	Buffer zone	
	- Major compliance -	> 40 meters	50 meters	
		20 to 40 meters	40 meters	
		10 to 20 meters	20 meters	
		5 to 10 meters	10 meters	
		< 5 meters	5 meters	
		conducted on 17/03/2 Laboratories Sdn Bhd. COD, AN, SS, pH and of Analysis (CoA)ref: ( parameters were with	alysis (inlet and outlet) was 018 which was analysed by Union 7 parameters tested ( DO, BOD5, Phosphate) Based on Certificate 03J01111, the result shown all the in the limits (based on WQI-DOE).	
4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	Not applicable as GBSE is standalone mill without estate.		Not applicable
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	Not applicable as GBSI	E is standalone mill without estate.	Not applicable

Criterion	/ Indicator	Assessment Findings	Compliance
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators. The estates are continue to plant beneficial plants such as Turnera subulata. IPM strategies for GBSE: i) Beneficial plant: 6:2:2 (target for minimum 1 dm/ha) [Turnera: Cassia : Antigonon]	Complied
		ii) Barn owl box: Occupancy rate average at 70% (1 <sup>st</sup> round in April 2018) together with BOB maintenance and replacement/new box. Target on the BOB placement is 1 every 15 Ha.	
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	Training records for staff and workers on IPM implementation were available and verified to be satisfactory during on-site assessment. Latest training dated 15/3/18 was carried out by GPRC personnel	Complied
Criterion 4		halth or the environment	
Pesticides a 4.6.1	are used in ways that do not endanger he Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non- target species shall be used where available. - Major compliance -	The SOP and justification of pesticide used documented under Sustainability Management Procedure Manual, SMP-GPB-28, rev:4 dated 3 July 2018. a) Crop stage b) Application Type c) Pesticide Names d) Active Ingredient e) Class ( by Pesticide Malaysia ) f) WHO class g) Target Weed/Pest h) Justification of Use	Complied
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active	Amendment to include nursery fungicide (Dixan – Mancozeb), Arakus, Fezmet, Pestac and Kenlate. The records of pesticides used were available at GBSE. Sighted record which was update on 13/6/18. Summary of chemical usage trend for the last 3 years as follow:	Complied
	ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Usage         2016         2017         2018 (to date)           Kg/Ha         2.57         3.17         2.95           Ai/Ha         1.021         1.322         1.239	

Criterion /	/ Indicator	Assessment Findin		Compliance
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	Use of pesticide is programme. To red implemented in GBSE a) Planting of benefic b) Barn Owls Documented IPM is fo	minimized and part of the IPM uce chemical use the following is ial plant ound in the Oil Palm Manual under revision June 2013 ) OPM 5. It ch as :	Complied
		There is no prophylad	tic use of pesticides at GBSE.	
4.6.4	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, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -	Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class II, III & IV chemical used at visited estate.		Complied
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	and application of protective equipme	PPE recommendation Respirator with organic vapour cartridge (A1P2K) Rubber nitrile gloves Chemical goggles Body apron Dust mask3M 9010 N95	Complied
		operators and under	Rubber/cotton glovesVentilationfan/ventilationDusk mask 3M 9010 N95Safety bootsWelding gloveshed to the products explained torstood by them. This was notedwith workers at field OP01.	

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Criterion /			Compliance
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.	Complied
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sustainability Management Procedure Manual, SMP-GPB-28, rev:4 dated 3 July 2018. The implementation in the field is consistent with the established procedure. For weeding activities, knapsack spray pump and low volume CDA spray are used for selective spraying. Mono spray is used for circle spraying.	Complied
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No aerial spray at GSBE.	Complied
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	nance of employee and ted smallholder knowledge and n pesticide handling shall be strated, including provision of riate information materials (see n 4.8).Noassociated smallholders at SOU22. Employees demonstrate knowledge and skills on pesticide handling. MSDS/SDS was displayed in local Bahasa Malaysia language at the agrochemical store for each chemical stored as well as the use of safety pictorial poster for the easy understanding of the agrochemical handlers.	
4.6.10	roper disposal of waste material, ccording to procedures that are fully nderstood by workers and managers hall be demonstrated (see Criterion .3). Minor compliance -		Complied
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	Annual medical surveillance for sprayers and pesticide operators were demonstrated. Latest was conducted on 4 <sup>th</sup> November 2017 under Poliklinik Sakthi and Sheila by registered OHD, HQ/12/DOC/00/262. Total of 15 workers send for medical surveillance. Based on USECHH 3and 4, no detrimental of health recorded and workers are fit to work.	Complied
4.6.12	No work with pesticides shall be undertaken by pregnant or breast- feeding women. - Major compliance -	Noted there were a few women working as chemical mixers and sprayers. Verified that the worker were over the reproductive age.	Complied

An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:

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Criterion / Indicator	Assessment Findings	Compliance
Criterion / Indicator         2.7.1       A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.         - Major compliance -	<ul> <li>Assessment Findings</li> <li>The Occupational Safety And Health Policy was established, signed by President and Chief Operating Officer on 1 July 2015.</li> <li>OHS management plan for 2018 has been established. The OHS plan comprises of OSH objectives, OSH policy, training, accident &amp; incident statistic, OSH meetings, HIRARC, emergency response plan (ERP), First aid kit, audit inspection and etc.</li> <li>Workplace Inspection (quarterly)</li> <li>Latest inspection was carried out on 11/5/18 by safety committee for chemical store, tractor and heavy vehicle, harvesting and fertilizer store. Workplace inspection need to be done prior to safety meeting as the inputs will be discussed in the meeting.</li> <li>First Aid Kit and Fire Extinguisher (FE) Inspection (monthly)</li> <li>There are total of 20 FE available at GBSE; 4 units of CO2 and 16 units are dry powder. FE are located at each pertinent location within estate's work units and under serviceable condition. The last inspection was carried out in the month of June 2018. Monthly check was carried out for harvesting gang (23/7/18), tractor drivers (2/7/18) and spraying gang (18/7/18) by Estate Hospital Assistant (EHA). No record of expired item reported in the checklist and the required item has been replenished.</li> </ul>	Complied

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Criterion /	/ Indicator	Assessment Findings	Compliance
4.7.2	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. - Major compliance -	GBSE had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. Latest HIRARC review was carried out on 16/7/18 with regards to Mono Spray/CDS/CKS/AP30/Mist Blower activity. Other activities such as chemical mixing and harvesting (tall/low/prime/terrace/swampy area) was also reviwed.	Complied
		<b>Chemical Health Risk Assessment (CHRA)</b> CHRA was conducted on 15/3 to 30/4/17 (GBSE) by QMSPRO Training & Consultancy (JKKP HIE 127/171- 2(154). 3 work units were assessed and related recommendation report under from F of the report. Example of recommendation as per below:	
		Work unitRecommendationFertilizerChemical safe handling every 2 yearsApplicationPersonnel	
		PesticidesChemical safe handling every 2 yearsApplicationBiologicalPersonnelsurveillance programme	
		Workshop Chemical safe handling every 2 years `Personnel	
4.7.3	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -	Awareness and training programme had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. Suitable PPE has been provided to the workers based on the information in the MSDS/CSDS and CHRA assessor's recommendation. List of Personal Protective Equipment (PPE) Provided – identifies the type of PPE for the respective activities. Field workers (sprayer, manurer & harvester) – organic	Complied
		vapour cartridge respirator, anti-mist goggles, wellington, boots, apron and sickle cover.	
4.7.4	The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -	OSH Committees meeting conducted quarterly and meeting minutes includes issues raised and action taken form workplace inspection report etc. Estate assistant manager appointed at secretary of SHC and the chairman is the Estate Manager. Verified appointment letter dated 5/2/18 and valid for 2 years. The latest meeting was carried out on 11/6/18 and attended by the SHC committee from both management and workers representative.	Complied
		The discussion on the accident review, workplace inspection, safety improvement plan, issues from workers, training, complaints has been discussed and action to be taken. There was no major issue raised.	

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Criterion /	/ Indicator	Assessment Find	ings		Compliance
<u>Criterion</u> 4.7.5	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. - Minor compliance -	Accident and en communicated to of Fire evacuation du (GBSE) to test the situation. Workers t field operations. S (CoP) for harves below: i) Certificate no. FA First Aid, CPR and A ii) Certificate no. FA First Aid, CPR and A Record of accident	nergency procedure employees, contractor rill was last conduct state of readiness du rained in First Aid wer ample of certificate ting and spraying m 2231/18/29497 – Bas AED Training, valid ur v2233/18/29499 – Bas AED Training, valid ur submitted to DOSH v	ors and visitors. Atted on 6/7/18 Iring emergency re present in the of proficiency, handore as per sic Occupational httl 19/3/21 sic Occupational httl 19/3/21 via online portal	Compliance
4.7.6	All workers shall be provided with medical care, and covered by accident insurance.	http://mykkp.dosh.gov.my Reference number: JKKP 8/9117/2018 dated 12/1/18 Medical care is provided to all the employees. Local workers are covered under SOCSO scheme while foreign workers are covered under foreign workers		Complied	
	- Minor compliance -	compensation sche Insurance LONPAC insurance Bhd, W/17/BX22/157 468/KUL-20	me. Period Valid until 29/10/18	Remarks GBSE	
4.7.7	Occupational injuries shall be recorded using Lost Time Accident	SOCSO, <i>Jadual</i> <i>Caruman</i> 8A Records on Lost	Jadual Caruman 8A for June 2018 Time Accident (LTA sed on accident stati		Complied
	(LTA) metrics - Minor compliance -		mple of accident sta		
		2017 2018 (to date June 18) *LTA is equivalent	2 cases (18 LTA) 3 cases (18 LTA)		

All staff, workers, smallholders and contract workers are appropriately trained.

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Criterion /	/ Indicator		nt Findings		Compliance
4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of	Training Pr covers all a	ogramme for 2018 was aspects of the RSPO Prin training carried out in 202	ciples and Criteria.	Complied
	training needs and documentation of	Date	Training	Trainer	
	the programme. - Major compliance -	9/3/18	Field Operation Training (Spraying Manuring, Pre-mixing)	Estate Assistant	
		19- 20/3/18	First Aid Training	Cert Academy Sdn Bhd	
		5/2/18	PPE and Safety Training	Estate Assistant	
		6/3/18	Tractor Driver Competency Training	Sime Kubota Sdn Bhd	
		8/7/18	Fire Demonstration and Fire Fighting Training	Estate Assistant	
4.8.2	Records of training for each employee shall be maintained. - Minor compliance -		g records for each emplo ined accordingly at GBSE.		Complied
Criterion ! Aspects of mitigate the improveme	plantation and mill management, includin e negative impacts and promote the posit nt.	g replanting, ive ones are	that have environmental made, implemented and	impacts are identifie monitored, to demor	
Criterion ! Aspects of mitigate the	<b>5.1:</b> plantation and mill management, includin e negative impacts and promote the posit	g replanting, ive ones are The impact on activitie assessment	that have environmental made, implemented and assessment was conduct s of the estate. The l was conducted on 08/06	impacts are identifie monitored, to demor red internally based ast review of the /2018.	
Criterion ! Aspects of mitigate the improveme	5.1: plantation and mill management, includin e negative impacts and promote the posit nt. An environmental impact assessment (EIA) shall be documented.	g replanting, ive ones are The impact on activitie assessment	that have environmental made, implemented and assessment was conduct s of the estate. The l was conducted on 08/06 assessment has identifie	impacts are identifie monitored, to demor red internally based ast review of the /2018.	nstrate continual
Criterion ! Aspects of mitigate the improveme	5.1: plantation and mill management, includin e negative impacts and promote the posit nt. An environmental impact assessment (EIA) shall be documented.	g replanting, ive ones are The impact on activitie assessment The impact negative im Samples of	that have environmental made, implemented and assessment was conduct s of the estate. The l was conducted on 08/06 assessment has identifie pacts. activities verified:	impacts are identifie monitored, to demor red internally based ast review of the /2018. ed the positive and	nstrate continual
Criterion ! Aspects of mitigate the improveme	5.1: plantation and mill management, includin e negative impacts and promote the posit nt. An environmental impact assessment (EIA) shall be documented.	g replanting, ive ones are The impact on activitie assessment The impact negative im Samples of 1. Pesticid contam mitigati	that have environmental made, implemented and assessment was conduct so of the estate. The l was conducted on 08/06 assessment has identified pacts. activities verified: le Spraying has identified ination to land and w on plan is to manage no of rian zone. Signage and	impacts are identifie monitored, to demor red internally based ast review of the /2018. ed the positive and fied the possible vater course. The chemical application	nstrate continual
Criterion ! Aspects of mitigate the improveme	5.1: plantation and mill management, includin e negative impacts and promote the posit nt. An environmental impact assessment (EIA) shall be documented.	g replanting, ive ones are The impact on activitie assessment The impact negative im Samples of 1. Pesticid contam mitigati at ripai implem Replanting	that have environmental made, implemented and assessment was conduct s of the estate. The l was conducted on 08/06 assessment has identified pacts. activities verified: le Spraying has identified ination to land and w on plan is to manage no of rian zone. Signage and ented. activities has identified po plan is to plant cover crop	impacts are identifie monitored, to demor red internally based ast review of the /2018. ed the positive and fied the possible vater course. The chemical application marking has been	nstrate continual

Criterion /	/ Indicator	Assessment Findings	Compliance
5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. - Minor compliance -	<ul> <li>The monitoring protocol are incorporated in both the management plans which is reviewed once a year. Sample of the monitoring:</li> <li>1. Training records for Harvesting operation on how to stack fronds to prevent fertilizer runoff on 01/06/2017.</li> <li>Landfill selection are based on identification my assistant manager and estate manager. Based on interview, the selection process of the site is consistent with the Landfill and Domestic Waste Management procedure dated 01/12/2014.</li> </ul>	Complied
Criterion 5	5.2.		
The status of plantation of	of rare, threatened or endangered specie	es and other High Conservation Value habitats, if any, that emile management, shall be identified and and operations m	
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape- level considerations (such as wildlife corridors). - Major compliance -	The HCV assessment for Northern Region (including Genting Bukit Sembilan estate) was conducted by Dr Yap Son Kheong in March 2010. The HCV assessment has included the inventory of the flora and fauna that is present in the Genting Bukit Sembilan Estate (including outline division Paya Kamunting).	Complied
5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	As per the HCV report, it was identified that there is HCV 1.4 present in Genting Bukit Sembilan estate. The management plan recommended was putting up signage against encroachment of forested area and inform the Department of Wildlife and National Parks on poaching. The management plan was developed and reviewed on 19/06/2018.	Complied
5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	Continuous training has been conducted to educated workers regarding the HCV areas and what is RTE species. Sample of last training was conducted on 27/06/2018. During the field assessment, the signage was observed to be setup as a reminder for the workers.	Complied

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Criterion /	/ Indicator	Assessment Findings	Compliance
5.2.4	<ul> <li>Where a management plan has been created there shall be ongoing monitoring:</li> <li>The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and</li> </ul>	HCV monitoring checklist has been established to monitor the status of the HCV and RTE according to the recommendation of the HCV assessment report. The monitoring includes present of the wildlife, encroachment, protection of flora and ensure all signage are in good conditions.	Minor nonconformance
	reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	The last monitoring was conducted on 26/06/2018 for Bukit Sembilan main division. The outcome of the monitoring was reviewed with the Estate Managers.	
		The monitoring results is reflective to the management plan.	
		However, the management plan did not consider appropriate management prescriptions for HCV 1.4 and those species that are using the area for critical feeding, nesting/ roosting sites, pathways or contains saltlicks.	
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	Not applicable. No HCV set asides with existing rights of local communities. This has been confirmed during the stakeholders consultation.	Complied
Criterion 5	5.3:		
		in an environmentally and socially responsible manner.	
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	The waste produced from the operations are identified and documented in the Identification, Segregation and Storage of Waste table dated 21/06/2017. The type of waste has been identified and the actions to handle the wastes are included in table.	Comlied
5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	The chemical and their containers (e.g. lubricants, chemical containers) are disposed through scheduled waste. The first generated information is available storage area at Paya Kamunting Division.	Complied
		As it is Scheduled waste, the total waste generated on Paya Kamunting is reported in eSwis. The last report was on 30/06/2018. There is so far no consignment not for the scheduled waste collection except the pesticide chemical containers. The pesticide containers are collected by G-Planter. Up	
		to date there is no collections recorded at Paya Kamunting.	
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.	The waste management and disposal plan is established dated 23/03/2018.	Complied
	- Minor compliance -	The management plan includes recycling of office papers, disposal of scheduled waste through licensed scheduled waste collector.	
		During the field assessment, recycling program at office is being observed. The last disposal of SW410 and SW305 was on 14/03/2018 by Kumaran & Company Sdn Bhd. Consignment number 2018031512QS12CF and 20180315116N78RS respectively.	

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/ Indicator	Assessment Findings	Compliance
5.4:		
A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	The fossil fuel consumption used are mainly for vehicle to cover the operations. Monthly and annual monitoring of the fossil fuel consumed are available. The diesel consumed for year 2017 is 1.06l per ton of FFB while year to date in 2018 is 1.52l per ton of FFB.	Minor nonconformance
	Management plan has been established to improve the efficiency of the fossil fuel usage. However, the management plan dated 25/07/2018 did not considered change of plan or further improvement identification since the diesel usage for the first 6 months of 2018 is 1.52l per ton of FFB.	
5.5:		
	d, except in specific situations as identified in the ASEAN gu	idelines or other
There shall be no land preparation by burning, other than in specific	No burning policy is available and signed by (President & Chief Operating Officer) dated 10 Aug 2011 and no	Complied
situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in	evidence of open burning was observed during onsite visit to the line site as well as the areas surrounding the office.	
Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.	No use of fire for land preparation during replanting. Only mechanical machine will be used for felling and land preparation.	Not applicable
	eenhouse gases, are developed, implemented and monitor	ed.
An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).	The polluting activities are and type of pollutants and GHG emission has been identified in the Significant Pollutants and GHG Emission – Reduction / Minimization Plan dated 24/07/2018.	Complied
- Major compliance -		
	<ul> <li>5.4:</li> <li>f fossil fuel use and the use of renewable</li> <li>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.</li> <li>Minor compliance -</li> <li>S.5:</li> <li>for preparing land or replanting is avoided est practice.</li> <li>There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</li> <li>Major compliance -</li> <li>Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</li> <li>Major compliance -</li> <li>Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</li> <li>Minor compliance -</li> <li>S.6:</li> <li>duce pollution and emissions, including gaseous emissions, particulate/soot emissions and effluent (see Criterion</li> </ul>	5.4:         of fossil fuel use and the use of renewable energy is optimised.         A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.       The fossil fuel consumption used are available. The diesel to cover the operations. Monthly and annual monitoring of the fossil fuel consumed for year 2017 is 1.061 per ton of FFB while year to date in 2018 is 1.521 per ton of FFB.         Management plan has been established to improve the efficiency of the fossil fuel usage. However, the management plan dated 25/07/2018 did not considered change of plan or further improvement identification since the diesel usage for the first 6 months of 2018 is 1.521 per ton of FFB.         S.5:       for preparing land or replanting is avoided, except in specific situations as identified in the XSEAN policy on Zero Burning' 2003, or comparable guidelines in other regions.       No burning policy is available and signed by (President & Chief Operating Officer) dated 10 Aug 2011 and no evidence of prior approval of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.         - Major compliance -       No use of fire for land preparation during replanting. Only mechanical machine will be used for felling and land preparation.         S.6:       Only mechanical machine will be used for felling and land gregaration.         Mior compliance -       An assessment of all polluting activities shall be conducted, including greenhouse gases, are developed, implemented and monitor and emissions, narticulate/soot emission and effluent (see Criterion 4.4.).         Alta at def 24/07/2018.       Hore Sinficant and the Significant and dated 24/07/201

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Criterion /		Assessment Findings	Compliance
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	The main source of GHG from this operation is CO2 from fossil fuel combustion and NO2 from fertilizer applications. The reduction plan for minimizing NO2 emission is to replace straight fertilizers with compound fertilizers; reduction on tractor usage by implementing cluster harvesting and systematic evacuation. The structure cluster harvesting was verified.	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	The management plan was last reviewed on 24/07/2018. The GHG emission is reported using the Palm GHG version 3.1. The data inputs have been verified which had included the total diesel consumed for all activities within the operations and the tonnage of fertilizer consumed was cross checked with the bin cards.	Complied
<b>millers.</b> <b>Criterion</b> Aspects of plans to mi	<b>5.1:</b> plantation and mill management that hav tigate the negative impacts and promote	e social impacts, including replanting, are identified in a pa the positive ones are made, implemented and monitored, t	rticipatory way, and
continual in	nprovement.		
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Social Impact Assessment & Human Rights Impact Assessment (HRIM) was conducted on 2-12/5/2017 by Sustainability Department with status updated on 11/7/2017. The methodology of the assessment was through stakeholder consultation with the contractors, local communities, government authorities, schools' representatives and smallholders. The areas that covered during the assessment were such as safety & health, environment, security, workforce, channel of communication, pay and condition and basic rights.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	The assessment was conducted with the participation of the stakeholders. Seen the attendance list and comments raised by the stakeholders. Besides, photo evidence was sighted.	Complied
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.	The GBSE has developed a Social Management and Monitoring Plan dated 25/7/2018. The management plan has incorporate the action to be taken, status of the issues, monitoring techniques and the person in charge.	Complied



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Criterion /	/ Indicator	Assessment Findings	Compliance
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties Minor compliance -	The plan was reviewed on 25/7/2018.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	Not applicable as there was no scheme smallholders involved in the certification unit.	Not applicable
Criterion (			
There are o	pen and transparent methods for commu	unication and consultation between growers and/or millers,	local communities
and other a	ffected or interested parties.		
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	Genting Plantations Berhad has developed Procedures for Consultation and Communication with Doc. No. SMP- GPB-17, dated 23/2/2018 revision 02. The procedure has included the communication and consultation mechanism and the guidance for carrying out stakeholder consultation and handling complaints. The consultation process is where the management and its stakeholders jointly examine and discuss the issues of mutual concern. The methods for communication are such as email and letter, meetings, open house and during sport event.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	The Sustainability Coordinator has been appointed as officer to be responsible on the matters related to ISCC, RSPO and MSPO at Genting Bukit Sembilan Estate. Seen the appointment letter dated 9/6/2017.	Complied

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Criterion /	/ Indicator	Assessment Findings	Compliance
.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	Stakeholder list was developed in Genting Bukit Sembilan Estate where the stakeholders such as government agencies, local communities, suppliers and contractors, cattle owner and neighbouring plantations were included in the list. Stakeholder meeting was conducted on 14/3/2018 with participation of stakeholders such as school's representative, Chairman of the Village, neighbouring estates and local authorities in Genting Bukit Sembilan Estate and 13/3/2018 in Paya Kamunting Division. Meeting minutes for the stakeholder meeting was sighted. The issues raised during the meeting were resolved and responded to the stakeholders if the suggestion could not be make it. For eg: The villager has requested the company to construct a playground in the company's land. However, the company has sought approval from the top management but it was not approved. The estate has responded through an official letter to the Chairman of Village to inform regarding this issue. Seen the letter dated 6/4/2018.	Complied
		Besides, internal stakeholder meeting was conducted on 9/3/2018 which involved workers' representatives and contractors. No issue was reported verified through meeting minutes.	
Criterion ( There is a r		for dealing with complaints and grisvances, which is imple	
ccepted by	all effected parties.	for dealing with complaints and grievances, which is imple	mented and
		Genting Plantations Berhad has implemented Complaints and Grievances Procedure with Doc. No. SMP-GPB-19 dated 21/3/2018 revision 03. The procedure has clearly outlined the process of dealing the complaints and grievances. The complaints and grievances can be made through post, email or via the Complaint and Suggestion Box located in the office. The time frame to acknowledge and respond to the complaints and grievances is within 1 month upon receipt. Genting Bukit Sembilan Estate has implemented	mented and Complied

#### Criterion 6.4:

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.

Criterion	/ Indicator	Assessment Findings	Compliance
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	Genting Plantations Berhad has developed Procedure on Conflict Resolution and Handling of Negotiations and Compensations within GENP Estates with Doc. No. SMP- GPB-18 dated 29/12/2017 revision 03. The objective is to provide guidelines on the handling of land issues/ boundary conflicts in the estates. Planting, buildings, fences, roads and drains are considered as encroachments. Negotiation will be made by the estate's management if any case reported. Compensation procedures on overplanted and under planted land was clearly explained in the procedure. A licensed surveyor to be engaged to re-survey the actual boundary and if involved compensation, VP or GM of Plantations will make the decision.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	SOP as per indicator 6.4.1.	Complied
6.4.3 Criterion (	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	There was no land dispute reported in Genting Bukit Sembilan Estate.	Complied
Pay and co	nditions for employees and for contract v	vorkers always meet at least legal or industry minimum star	ndards and are
6.5.1	<ul> <li>provide decent living wages.</li> <li>Documentation of pay and conditions shall be available.</li> <li>Major compliance -</li> </ul>	The estate has employed local workers, foreign workers and contract workers. The management has included basic pay, net pay, gross pay, deduction of salary, holiday pay on the pay slip. Sampled of payslip for December 2017, February 2018 and June 2018 as below: a. Employee No.: 01089 b. Employee No.: 02458 c. Employee No.: 02425 e. Employee No.: 02528 All the sampled workers were achieved Minimum Wage Order 2016.	Complied

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Criterion /	/ Indicator	Assessment Findings	Compliance
6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -	<ul> <li>Employment contract are available and explained in language that understood by workers. The contract was signed by the workers and sampled contracts as below: <ul> <li>a. Employee No.: 02432</li> <li>b. Employee No.: 02425</li> <li>c. Employee No.: 02528</li> <li>d. Employee No.: 02546</li> <li>e. Employee No.: 26701</li> </ul> </li> <li>Sampled workers found that they were not signed on the new addendum of employment contract dated 21/3/2018 as below: <ul> <li>a. Employee No.: 01089</li> <li>b. Employee No.: 02462</li> <li>d. Employee No.: 02469</li> </ul> </li> <li>Besides, the watchman (Employee No.: 02548) that recruited on March 2018 has yet to sign on the employment contract. Thus, a major non-conformance was raised.</li> </ul>	Major nonconformance
6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –	Linesite inspection was conducted on weekly basis by HA and the last inspection was carried out on 4/7/2018, 12/7/2018, 19/7/2018 and 23/7/2018. Free medical assistance, water and electricity supply was provided to workers. Interviewed with the workers found that they were satisfied with the housing condition.	Complied
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance –	The estate was located nearby the town where the workers could be easily access to the foods and goods. Besides, there was a truck of selling foods and goods entered the estate on daily basis to allow the workers to buy sundry.	Complied
the right to	ver respects the rights of all personnel to	form and join trade unions of their choice and to bargain c rgaining are restricted under law, the employer facilitates p all such personnel.	
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	The company has developed People Policy (Bahasa Malaysia and English) dated 3/8/2009 where the company is allowed the workers on freedom of association. The policy was displayed at the notice board in the office area. Briefing of the policy was conducted on 9/3/2018 and during induction training for the new workers in the language that understood by the workers. Seen the training records such as training attendance list and training materials.	Complied



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Criterion /	/ Indicator	Assessment Findings	Compliance
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Workers Committee was established in Genting Bukit Sembilan Estate and it formed by representatives from different countries and different work station such as Indonesian, Pakistan, Bangladeshi, local, general workers, harvesting group and sprayers. The meeting was conducted on 11/6/2018 with total 14 participants from management and workers. Seen the meeting minutes and subjects such as housing, pay and at working place were discussed in the meeting. No issue was raised by the workers. Verified through interviewed with the workers' representatives confirmed that no issue regarding their working place, housing and salary has been reported.	Complied
Criterion (	<b>6.7:</b> e not employed or exploited.		
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Genting Plantations Berhad has developed People Policy dated 3/8/2009 where the company does not employ illegal workers nor exploit under aged children to work in the operating units. Document reviewed of the master list of employees and interviewed with the workers confirmed that no child labour was employed. All the workers are above 18 years old.	Complied
		ional origin, religion, disability, gender, sexual orientation,	union membership
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	Genting Plantations Berhad has established People Policy dated 3/8/2009 signed by Chief Operating Officer where the company prohibit any form of violence, harassment or discrimination against race, religion, national origin, disability, pregnancy, age and gender. The policy was displayed at the notice board in the office area. Briefing of the policy was conducted on 9/3/2018 and during induction training for the new workers. Seen the training records such as training attendance list and training materials.	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	The estate has recruited local and foreign workers with the composition of female and male workers. They were treated equally without any discrimination. They were paid according to legal requirements. Interviewed with the female and male workers confirmed that they were allowed to transfer to other work stations if they found they are unfit for the job.	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	Genting Plantations Berhad has developed Manpower Recruitment and Orientation, Doc. No. PM-MR-02 dated 2/1/2018 revision 0. The procedure has clearly stated the selection of recruitment and hiring process, promotion of the employees internally before recruit for new employees. The recruitment was also based on the medical report for the fitness to work. For GAIOM, they have engaged with some external parties such as	Complied

There is no harassment or abuse in the work place, and reproductive rights are protected.

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Criterion	/ Indicator	Assessment Findings	Compliance
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	Genting Plantations Berhad has implemented Sexual Harassment Policy dated 3/8/2009 signed by Chief Operating Officer. The company is committed to strive for harassment-free environment. The policy was displayed at the notice board in the office area. Briefing of the policy was conducted on 9/3/2018 and during induction training for the new workers. Seen the training records such as training attendance list and training materials.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	Social Policy dated 22/6/2015 was developed and implemented. The company will respect and protect the reproductive rights. The policy was displayed at the notice board in the office area. Briefing of the policy was conducted on 9/3/2018 and during induction training for the new workers. Seen the training records such as training attendance list and training materials.	Complied
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	Gender Committee was established in Genting Bukit Sembilan Estate and Genting Paya Kamunting Division. The committee was leading by the Chief Clerk and Office Clerk. Meeting was conducted twice in a year and seen the meeting minutes. The last meeting was conducted on 9/2/2018 in Genting Bukit Sembilan Estate and 26/2/2018 in Paya Kamunting Division. Verified the meeting minutes and interviewed with the female representatives confirmed that no case of sexual harassment and violence has reported.	Complied
Criterion (	<b>5.10:</b> Id mills deal fairly and transparently with	smallholders and other local husinesses	
6.10.1	Current and past prices paid for Fresh	Not applicable as this is stand-alone estate.	
	Fruit Bunches (FFB) shall be publicly available. - Minor compliance -		Complied
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	Not applicable as this is stand-alone estate.	Complied
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	<ul> <li>Contractor agreements were sampled as below:</li> <li>a. Agreement No.: GBSE/TR/18/01/01 for loading and transporting of FFB which valid from 1/1/2018 to 31/12/2018. (GBSE)</li> <li>b. Agreement No.: GBSE/TR/18/01/02 for loading and transporting of FFB which valid from 1/1/2018 to 31/1/22018. (Paya Kamunting Division)</li> <li>Agreement No.: GBSE/TR/18/01/03 for loading and transporting of EFB which valid from 1/1/2018 to 31/12/2018. (GBSE)</li> </ul>	Complied

Criterion /	/ Indicator	Assessment Findings	Compliance
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	The contractors submitted the invoice to the estate and the estate has sent all the relevant records such as Purchase Summary, General Work Order and Schedule of Work Completed to Head Office. The Head Office will have processed the payment and bank transfer to the contractors. Sampled of the payment advice for April – June 2018 as below: a. Transfer Reference: 3338194075 on 13/7/2018 b. Transfer Reference: 3258162988 on 11/6/2018 c. Transfer Reference: 3258141742 on 21/5/2018 Interviewed with the contractors confirmed that payment was made promptly.	Complied
Criterion 6			
Growers an 6.11.1	d millers contribute to local sustainable d Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	evelopment where appropriate. Genting Bukit Sembilan Estate has made contributions to the communities such as organized football tournament within the estates, celebration together with the workers during festive season such as Hari Raya. Donation to the temple festival was carried out and seen the cash voucher receipt of donation. Besides, the estate has donated to the school's sport day and helped to clean up the school surrounding. The estate also offered job opportunities to the local communities.	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	Not applicable as there was no scheme smallholders involved in the certification unit.	Not applicable
Criterion 6	5.12:		
	f forced or trafficked labour are used.		
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	The company has recruited all the employees with legal identification for local and valid passport and work permit for foreign workers and contract workers. Contract of employment was signed by the workers prior to work. Sampled of foreign workers with valid work permit as below: a. Permit No.: PD 9622387 valid until 9/12/2018 b. Permit No.: PD 9245865 valid until 6/11/2018 c. Permit No.: PE 0712991 valid until 25/5/2019 d. Permit No.: PE 0375604 valid until 27/3/2019	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	Interviewed with the foreign workers confirmed that they have freedom to go out from the compound during off day. They also voluntarily to hand out their passport to keep by the management to avoid any loss of passport. Interviewed with the foreign workers confirmed that no substitution of contract has occurred. The terms and conditions offered in their home country is similar when their arrival in Malaysia.	Complied



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	/ Indicator	Assessment Findings	Compliance
are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -		Genting Plantations Berhad has developed Procedures for Social Management, Doc. No. SMP-GPB-32, Rev. 0, dated 18/1/2018. The procedure has clearly outlined the practices of the company such as no contract of substitution for the foreign workers, provide reasonable and safe living condition to all the employees, post arrival orientation will be provided to brief on terms and conditions, safety & health, national and state laws and regulations and no discrimination to all the workers.	Complied
Criterion 6			
Growers an 6.13.1	A policy to respect human rights. A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	Genting Plantations Berhad has developed Social Policy dated 22/6/2015 where the company respect and support the Universal Declaration of Human Rights. The policy was displayed at the notice board in the office area. Briefing of the policy was conducted on 9/3/2018 and during induction training for the new workers. Seen the training records such as training attendance list and training materials. Interviewed with the workers confirmed that they were respected by the company.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Not applicable for Peninsular Malaysia.	Complied
Principle 7	7: Responsible development of new	plantings	
Conting B		any new plantings since November 2005. Therefore, Princi t. The immature areas are replanted area.	ple 7 is not

Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.

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Criterion /	/ Indicator	Assessment Findings	Compliance
8.1.1	The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria. As a minimum, these shall include, but are not necessarily be limited to: • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); • Optimising the yield of the supply base. - Major compliance -	To improve the payment of contractors' labours, Genting has made decision to improve the LintraMax system and will pay the salary directly to the contract workers rather than going through the contractors. The contractors will only receive the balance of the payment. This action is to plan will be trial run in August 2018 at Genting Ayer Item Operating unit and later used in other operating unit.	Complied

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### **Appendix B: Approved Time Bound Plan**

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certificati on	Status as of 23 July 2018	Any unresolved non- compliances
1	Genting	Genting Sri Gading Estate,	Supply base for	Dec,2014	Certified	None
2	Plantations (WM) Sdn Bhd	Genting Sungei Rayat Estate,	Genting Ayer Item Oil Mill,			
3	& Setiamas Sdn Bhd(100%)for	Genting Kulai Besar Estate,	Johor, Malaysia			
4	estates	Genting Tanah Merah Estate,		Dec,2015		
5	Genting Oil Mill Sdn Bhd (100%) for mill	Genting Tebong Estate,		July, 2015		
6	Genting Plantations (WM) Sdn Bhd (100%)for estates	Genting Selama Estate, Kedah, Malaysia		July,2015 To be re- certified in July 2019	Voluntary Suspension of the Certificate w.e.f 1 Sept 2017	Land title conversion in progress
7	Genting SDC Sdn Bhd (100%)	Genting Sabapalm Estate, Sabah, Malaysia	Supply base for Genting Sabapalm Oil Mill, Sabah, Malaysia	Aug,2015	Certified	None
8	Genting Tanjung	Genting Tanjung Estate, Sabah,Malaysia	Supply base for Genting Tanjung	Aug,2016	Certified	None
9	Bahagia Sdn Bhd ( 100%) for estates	Genting Tenegang Estate, Sabah,Malaysia	Oil Mill, Sabah, Malaysia			
10		Genting Layang Estate, Sabah, Malaysia				
11		Genting Bahagia Estate,				
12	Landworthy Sdn Bhd (84%)	Genting Landworthy Estate, Sabah, Malaysia				
13	Genting Tanjung	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah	Oct 2018		The Remediation and Compensation
14	Bahagia Sdn Bhd ( 100%) for estates	Genting Permai Estate, Sabah, Malaysia	Oil Mill, Sabah, Malaysia			Procedures is pending for Genting Kencana Estate.
15		Genting Kencana Estate, Sabah, Malaysia				LUCA has been passed. Concept Note (CN) for Remediation and Compensation has been submitted to RSPO.
16	Genting SDC Sdn Bhd (	Genting Jambongan Estate, Sabah,Malaysia	Supply base for Genting Jambongan Oil	Sept 2019		Concept Note and Remediation Plan has been

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certificati on	Status as of 23 July 2018	Any unresolved non- compliances
	100%) for estate and mill		Mill,Sabah,Malay sia			submitted to RSPO. RSPO allowed for Genting Jambongan to proceed with its certification programme.
17	Genting Plantations Bhd Wawasan Land Progress Sdn Bhd (100%)	Genting Sekong Estate, Sabah, Malaysia	Supply base for Genting Trushidup Oil Mill, Sabah, Malaysia	Sept,2017	Certified	None
18	Asiaticom Sdn Bhd ( 100%) Sawit Sukau Usahasama Sdn Bhd(56%)	Genting Suan Lamba Estate, Sabah, Malaysia				
19	PT Sepanjang Intisurya Mulia (70%)	Mulia 1 & 2 Mulia 3 & 4 Mulia 5 & 6	Supply base for Mulia Oil Mill, Kalimantan, Indonesia	Oct, 2017	Audited	None
20	PT Sawit Mitra Abadi (70%)	Abadi 1 & 2 Abadi 3 & 4				
21	Genting Plantations Berhad (100%)	Genting Mewah Estate, Sabah, Malaysia	Supply base for Genting Mewah Oil Mill,Sabah, Malaysia	Mar,2017	Certified	None
22	Genting Plantations (WM) Sdn Bhd (100%)	Genting Bukit Sembilan Estate, Kedah, Malaysia		July,2017	Certified	None
23	PT Globalindo Agung Lestari (60%)	Lamunti Barat Estate Lamunti Timur Estate I &II Mengkatip Estate I & II Bakuta Estate Plasma Timur & Barat	Supply base for Globalindo Oil Mill, Kalimantan, Indonesia	Oct,2023		In process of obtaining HGU
						NPP for PT UAI in progress. In the process of obtaining HGU for UAI.
24	PT United Agro Indonesia(60% )	PT UAI 1 & 2 UAI Plasma		Oct, 2023		

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certificati on	Status as of 23 July 2018	Any unresolved non- compliances
25	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		
26	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		
27	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 Exchange prior to HGU application.
		DWK Plasma		Oct, 2023		
28	PT Citra Sawit Cemerlang (70%)	CSC Estates	Supply base for CSC Oil Mill*	Oct,2021		In process of obtaining HGU.
29	PT Surya Agro Palma (70%)	SAP Estate 1&2 SAP Estate 3&4 SAP Estate 5&6	Supply base for SAP Oil Mill*	Oct, 2020		In process of obtaining HGU.
30	PT Agro Abadi	AAC 1 & 2				NPP In Progress.
	Cemerlang (70%)	AAC 3 & 4				HCV report being reviewed at HCVRN.
31	PT Palma Agro Lestari Jaya (70%)	PALJ Estates	Supply base for PALJ Oil Mill*	Aug,2023		NPP In Progress. HCV report under review by HCVRN.
		PALJ Plasma				
32	Knowledge One Investment Pte Ltd ( 85%)-PT Kharisma Inti Usaha ( KIU)	KIU 1 & 2 KIU 3 & 4	Supply base for KIU Oil Mill	July, 2019		In progress to engage consultants to carry out assessments as per NPP requirements.
		KIU Plasma		July 2022		
L		1	1		1	1

**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

Estates not to be included into the TBP due to its future plan for property development.

No	Subsidiaries & Ownership (%)	Name of Estate	
1	Genting Plantations (WM) Sdn Bhd	Genting Cheng Estate, Melaka	
		Genting Sepang Estate, Selangor	

### Time bound Plan for Downstream Business (Supply Chain Certification)

No	Subsidiaries & Ownership (%)	Name of Plant	TBP for Certification	Status as of 31 March 2018	Any unresolved non compliances
1	Genting MusimMas Refinery Sdn Bhd (72%)	Genting MusimMas Refinery		Certified	None

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#### **Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in 2017 for Genting Bukit Sembilan Estate and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified include:

- 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 2017 for Genting Bukit Sembilan Estate are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
СРО	N/A
РКО	N/A

Production	t/yr
FFB Process	N/A
CPO Produced	N/A
PKO Produced	N/A

Extraction	%
OER	N/A
KER	N/A

Land Use		На
OP Planted Area		1,208.97
OP Planted on peat		0
Conservation (forested)		0.14
Conservation (non-forested)		0
Other Land Use		0
	Total	1,261.73

#### **Summary of Field Emission and Sink**

	Own Cr	op*	Gr	oup	3 <sup>rd</sup> Pa	arty	То	tal
	tCO2e	tCO2e / FFB	tCO <sub>2</sub> e	tCO2e / FFB	tCO2e	tCO2e / FFB	tCO2e	tCO2e / FFB
Emission								
Land Conversion	13,796.28	0.46	0	0	0	0	13,796.28	0.46
CO <sub>2</sub> Emission from fertilizer	809.14	0.03	0	0	0	0	809.14	0.03
NO <sub>2</sub> Emmision	933.34	0.03	0	0	0	0	933.34	0.03
Fuel Consumption	343.60	0.01	0	0	0	0	343.60	0.01
Peat Oxidation	0	0	0	0	0	0	0	0
Sink	Sink							
Crop Sequestration	-11,318.05	-0.37	0	0	0	0	-11,318.05	-0.37
Conservation Sequestration	0	0	0	0	0	0	0	0



Total	4,564.31	0.15	0	0	0	0	4,564.31	0.15

\*Note: Includes both estates and smallholders

#### **Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO2e/tFFB
Emission		
POME	N/A	N/A
Fuel Consumption	N/A	N/A
Grid Electricity Utilisation	N/A	N/A
Credit	· · ·	
Export of Grid Electricity	N/A	N/A
Sales of PKS	N/A	N/A
Sales of EFB	N/A	N/A
Total	N/A	N/A

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

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

\*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:			
Divert to Compost (%)	N/A		
Divert to anaerobic diversion (%)	N/A		

POME Diverted to Anaerobic Digestion:			
Divert to anaerobic pond (%)	N/A		
Divert to methane captured (flaring) (%)	N/A		
Divert to methane captured (energy generation) (%)	N/A		



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### Appendix D : General Chain of Custody Requirements for the Supply Chain

Not applicable

### Appendix E: Palm Oil Mill Supply Chain Assessment

Not applicable

### Supply Chain Declaration (Applicable For Appendix D)

Α.	A. Monthly Records of Certified and Uncertified FFB Received since the last audit						
No.	No.Month - YearVolume of FFB from certified supply bases (MT)Volume of FFB from uncertified supply bases (MT)Total FFB/Month (mt)						
	N/A						

В.	B. Monthly Records of Certified CPO & PK since the last audit					
No.         Month - Year         Certified CPO (MT)         Certified PK (MT)						
	N/A					

C.	C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any)					
No.	Buyers Name	Palmtrace Trading No	Certified CPO Sold (MT)	Certified PK Sold (MT)		
	N/A					

D. Records of CPO & PK Sold under other schemes (ISCC credits) to Buyers since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (MT)	PK Sold (MT)
N/A				

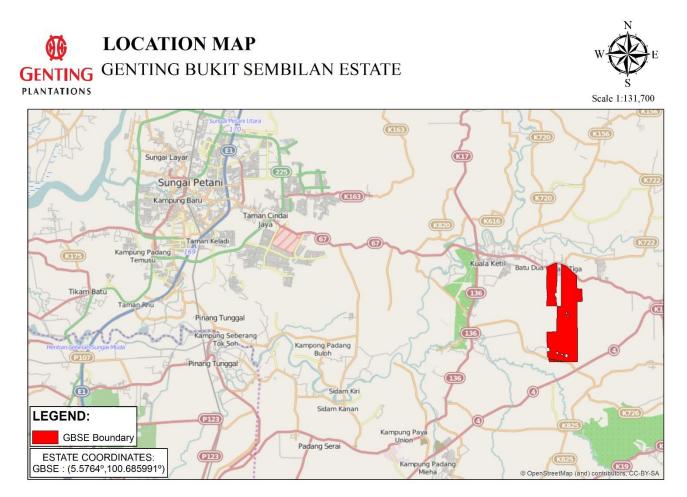
E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)				
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)	
N/A				



F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading No	RSPO Credits of	
			Certified CPO Sold (MT)	
N/A				



### Appendix F: Location Map of Genting Bukit Sembilan Estate

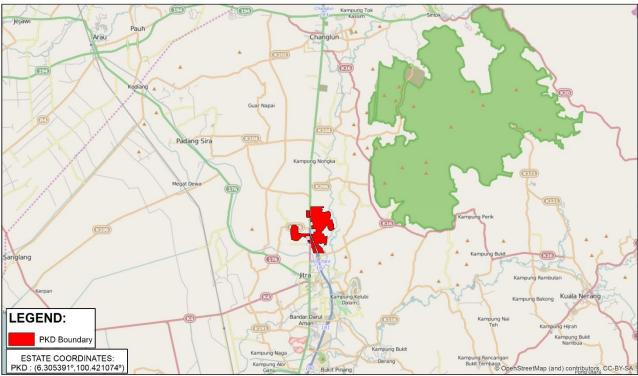




Appendix G: Location Map of Genting Bukit Sembilan Estate (Paya Kamunting Division)









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

Not applicable

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### **Appendix I: List of Abbreviations**

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