

**RSPO PRINCIPLE AND CRITERIA –
2nd Annual Surveillance Assessment (ASA2)
Public Summary Report**

Genting Plantations Berhad
Client company Address: 10 th Floor, Wisma Genting Jalan Sultan Ismail 50250 Kuala Lumpur Malaysia
Certification Unit: Genting Sabapalm Oil Mill & supply base Location of Certification Unit: KM 25, Down Sg. Labuk Mukim Tagas-Tagas, Sabah, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0086-06-000-00	Membership Approval Date	14/11/2006
Parent Company Name	Genting Plantations Berhad		
Address	Head office : 10 th Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia		
Subsidiary (Certification Unit Name)	Genting Sabapalm Oil Mill		
Address	Certification unit : Genting Sabapalm Oil Mill, KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, Sabah, Malaysia		
Contact Name	Mr. Tan Cheng Huat (Senior Vice President – Plantation Division)		
Website	http://www.gentingplantations.com	E-mail	chenghuat.tan@genting.com
Telephone	+603 2333 6510 (Head office) +607 7631 992 (Estate)	Facsimile	+603 2333 6575

2. Certification Information			
Certificate Number	RSPO 653477	Date of First Certification	09/06/2016
		Certificate Start Date	09/06/2016
		Certificate Expiry Date	08/06/2021
Scope of Certification	Palm Oil and Palm Kernel Production from Genting Sabapalm Oil Mill and Supply Base (Genting Sabapalm Estate)		
Applicable Standards	RSPO P&C 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MPOB/Cop/MF/0024-2	Code of Good Milling Practice for Palm Oil Mills	MPOB	20/12/2020
50450206 MSPO	Malaysian Sustainable Palm Oil	DQS	03/07/2019
AR 5768-ISO 9001:2008	QMS	SIRIM QAS International Sdn Bhd	14/09/2018
ER 0741 – ISO 14001:2004	EMS		14/09/2018
SR 0590 – OHSAS 18001:2007	OHSAS	SIRIM QAS International Sdn Bhd	24/02/2020
SR 0591 – MS 1722:2011	OSHMS		24/02/2020
EU-ISCC-Cert-DE119-60183799	ISCC EU	ASG Cert GmbH	12/01/2019
ISCC-PLUS-erf-60183799	ISCC PLUS	ASG Cert GmbH	12/01/2019

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Genting Sabapalm Oil Mill (60 mt/hr)	Beluran, Sabah, Malaysia	5° 57' 54.3" N	117° 22' 26.8" E
Genting Sabapalm Estate	Beluran, Sabah, Malaysia	5° 57' 54.3" N	117° 22' 26.8" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Sabapalm Estate	3,956.94	17.39	384.27	4,358.60	90.78%

Remark: Different in hectarage due to resurvey by GPRC in June 2017

6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Sabapalm Estate	308.28	951.74	1707.66	767.95	221.31	3,648.66	308.28

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (September 17 – August 18)	Actual (April 17 – March 18)	Forecast (September 18 – August 19)
Genting Sabapalm Estate	98, 517.59	98,577.42	93,500.00

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (September 17 – August 18)	Actual (April 17 – March 18)	Forecast (September 18 – August 19)
	N/A	N/A	N/A
Total			

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (September 17 – August 18)	Actual (April 17 – March 18)	Forecast (September 18 – August 19)
Smallholders	N/A	25,554.98	23,200.00
Total	N/A	25,554.98	23,200.00

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10. Certified Tonnage			
Mill Capacity: 20 MT/hr SCC Model: MB	Estimated (September 17 – August 18)	Actual (April 17 – March 18)	Forecast (September 18 – August 19)
	FFB	FFB	FFB
	98,517.59 mt	98,577.42 mt	93,500.00 mt
	CPO (OER: 22.16%)	CPO (OER: 21.46%)	CPO (OER: 21.45%)
	21,831.5 mt*	21,156.95 mt	20,055.00 mt
	PK (KER: 4.19%)	PK (KER: 4.31%)	PK (KER: 4.10%)
4,248.70 mt*	4,255.55 mt**	3,833.50 mt	

*Remark: Final tonnage include volume extension. CPO extension 1,223.4mt; PK extension = 352mt

** overlapping with previous reporting period.

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	1,590.59	15,220.06		4,058.43	20,869.08

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	2,829.77			1,283.82	4,113.59

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
59200 Kuala Lumpur
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BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at 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 from 18-19/04/2018. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The 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 & Criteria 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The estates sample were determined based on formula $N = 0.8\sqrt{y}$ where y is the number of estates (*Note: This is applicable until 30th June 2018*).
- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment (*Note: This is applicable starting from 1st July 2018*).
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix H.

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Genting Sabapalm Oil Mill	√	√	√	√	√
Genting Sabapalm Estate	√	√	√	√	√

Tentative Date of Next Visit: April 8, 2019 – April 10, 2019

Total No. of Mandays: 7.0 mandays

2.2 BSI Assessment Team:

Team Member Name	Role	Qualifications <i>(Short description of the team members)</i>
Mohd Hafiz Mat Hussain	Lead Auditor	He holds Bachelor Degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an 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 2013, Endorsed RSPO P&C Lead Auditor Course in 2014, Endorsed RSPO SCCS Lead Auditor Course in 2016 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since May 2013 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental, supply chain elements and workers and stakeholders consultation.
Valence Shem	Team Member	He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. Able to communicate in Bahasa Malaysia and English.
Hafriazhar Mohd Mokhtar	Team Member	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands and Gabon. During assessment, he covered the legal issues, social issues, worker’s welfare and stakeholder consultation. He is fluent in Bahasa Malaysia and English languages.

Accompanying Persons:

No.	Name	Role
	N/A	

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2.3 Assessment Plan

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

Date	Time	Subjects	MH	VS	HMM
Wednesday 18/04/2018 Genting Sabapalm Oil Mill	08:30-09:00	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation) Verification on previous audit findings 	√	√	√
	09:00-12:00	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√	√
	10:00-12:00	RSPO Supply Chain for CPO mill, weighbridge and storage area	√	-	-
	12:00-13:00	Lunch	√	√	√
	13:00-16:30	Genting Sabapalm Oil Mill Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√
	16:30-17:00	Interim Closing Briefing	√	√	√
Thursday 19/04/2018 Genting Sabapalm Estate	08:30-12:00	Genting Sabapalm Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc	√	√	√
	09:00-12:00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	√
	12:00-13:00	Lunch	√	√	√
	13:00-15:30	Genting Sabapalm Estate 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).	√	√	√
	15:30-16:00	Verify any outstanding issues & preparation for closing meeting	√	√	√
	16:00-17:00	Closing meeting	√	√	√
Friday 20/04/2018	AM	Audit team traveling back to KL	√	√	√

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 MYNI 2014 Checklist
- RSPO Supply Chain Certification Checklist June 2017

3.2 Progress against Time Bound Plan

Time Bound Plan		
Requirement	Remarks	Compliance
Summary of the Time Bound Plan		
Does the plan include all subsidiaries, estates and mills?	All subsidiaries, estates, mills and refinery (existing operations and yet to be constructed) was include except those estates (landholdings) planned to be developed into property development (West Malaysia).	Yes
Is the time bound plan challenging? <ul style="list-style-type: none"> • 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.	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 HGU) and IUP in order to secure the RSPO certificates. As of Feb 2018, only 2 PTs (PT SISM and PT KIU) in Indonesia have obtained the HGU. The rest are in process of applying for the HGU. Due to the unpredictable timeline 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

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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 March 2018	Yes
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		
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Yes	Yes
No replacement after dates defined in Nis Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p><u>Sabah</u></p> <p>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.</p> <p>2.Genting Jambongan Estate – LUCA passed, Concept Note and Remediation Plan has been submitted to RSPO. RSPO allowed for Genting Jambongan to proceed with its certification programme.</p> <p><u>Indonesia</u></p> <p>1. PT SISM – LUCA passed. Concept Note and Remediation Plan submitted and approved by Panel.</p> <p>Action plan to be checked by auditor during the next audit.</p> <p>2. PT GAL – LUCA submitted and under on-going review.</p>	Yes
Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	NPP for PT PALJ, PT AAC, PT UAI, PT SMA, PT KIU is in progress.	Yes
Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 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 criterion 6.3.	None	Yes
Did the company	Yes	Yes

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conduct an internal audit? If so, has a positive assurance statement been produced?		
Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	http://www.rspo.org/members/complaints/status-of-complaints/view/104	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
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?	Not applicable to Genting Sabapalm Oil Mill.	N/A

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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 2nd Annual Surveillance Assessment there were six (6) Major & one (1) Minor nonconformities raised. The Genting Sabapalm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1621036-201803-M1	Clause & Category (Major/Minor)	RSPO SCCS 5.3.1 Major
Date Issued	19/04/2018	Due Date	17/06/2018
Closed (Yes/No)	Yes	Date of nonconformity closure	15/06/2018
Statement of Nonconformity	The written procedure (Traceability and Mass Balance (Mill), SMP-GPB-23, Revision:04, Dated 21/11/2014) was not adequate.		
Requirement Reference	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 		
Objective Evidence	The latest requirements under RSPO SCC System and Standard revised June 2017 have not been incorporated in the SOP such as the requirement of internal audit.		
Corrections	To update the Internal Audit procedure		
Root Cause Analysis	The internal audit procedure was not updated to include the SCCS Internal Audit requirements		
Corrective Action	To ensure existing procedure are reviewed accordingly whenever new requirement are introduce		
Assessment Conclusion	The CAP and evidence submitted confirmed that the issue has been fully addressed hence the Major NC was closed on 15/6/2018. No onsite audit is required as the closure evidence relating to documentation is sufficient for offsite closure.		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1621036-201803-M2	Clause & Category (Major/Minor)	RSPO SCCS 5.3.2 Major
Date Issued	19/04/2018	Due Date	17/06/2018
Closed (Yes/No)	Yes	Date of nonconformity closure	15/06/2018
Statement of Nonconformity	The written procedure (Traceability and Mass Balance (Mill), SMP-GPB-23, Revision:04, Dated 21/11/2014) was not adequate.		
Requirement Reference	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <ul style="list-style-type: none"> i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. ii) effectively implements and maintains the standard requirements within its organization 		
Objective Evidence	<p>1. The latest requirements under RSPO SCC System and Standard revised June 2017 have not been incorporated in the SOP such as the requirements of internal audit.</p> <p>2. The internal audit has yet to be conducted.</p>		
Corrections	<p>To update the internal Audit Procedure (SMP-GPB-03)</p> <p>To conduct the RSPO SCCS Internal Audit</p>		
Root Cause Analysis	Supply Chain Internal audit was not conducted due to the Internal Audit Procedure was not updated as per latest SCCS requirements.		
Corrective Action	<p>To ensure existing procedures are reviewed and complied accordingly whenever new requirements are introduced.</p> <p>To ensure the latest procedure is filed and communicated to the management and sustainability team to ensure all the requirements are complied during the internal</p>		
Assessment Conclusion	The CAP and evidence submitted confirmed that the issue has been fully addressed hence the Major NC was closed on 15/6/2018. No onsite audit is required as the closure evidence relating to documentation is sufficient for offsite closure.		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1621036-201803-M3	Clause & Category (Major/Minor)	RSPO SCCS 5.13.1 Major
Date Issued	19/04/2018	Due Date	17/06/2018
Closed (Yes/No)	Yes	Date of nonconformity closure	15/06/2018
Statement of Nonconformity	Management review for RSPO supply chain has yet to be conducted.		
Requirement Reference	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.		
Objective Evidence	There was no evidence that management review pertaining to RSPO Supply Chain issues has been conducted.		
Corrections	To update the Managenet Review Precedure (SMP-GPB-06) To conduct Management Review meeting of SCCS.		
Root Cause Analysis	Management review was not conducted due to the Managenet Review Procedure was not updated as per latest SCCS requirements.		
Corrective Action	To ensure existing procedures are reviewed and complied accordingly whenever new requirements are introduced. To ensure the latest procedure is filed and communicated to the management and sustainability team to ensure all the requirements are complied during the management review meeting.		
Assessment Conclusion	The CAP and evidence submitted confirmed that the issue has been fully addressed hence the Major NC was closed on 15/6/2018. No onsite audit is required as the closure evidence relating to documentation is sufficient for offsite closure.		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1621036-201803-M4	Clause & Category (Major/Minor)	RSPO SCCS 5.13.2 Major
Date Issued	19/04/2018	Due Date	17/06/2018
Closed (Yes/No)	Yes	Date of nonconformity closure	15/06/2018
Statement of Nonconformity	Management review for RSPO supply chain has yet to be conducted.		
Requirement Reference	The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 		
Objective Evidence	There was no evidence that management review pertaining to RSPO Supply Chain issues has been conducted.		
Corrections	To update the Managenet Review Precedure (SMP-GPB-06) To conduct Management Review meeting of SCCS, and to ensure the meeting agenda covers all the required information as per the latest Management review Procedure		
Root Cause Analysis	Management review was not conducted due to the Managenet Review Procedure was not updated as per latest SCCS requirements.		
Corrective Action	To ensure the latest procedure is filed and communicated to the management and sustainability team to ensure all the requirements are complied during future management review meetings as well as minute of meeting.		
Assessment Conclusion	The CAP and evidence submitted confirmed that the issue has been fully addressed hence the Major NC was closed on 15/6/2018. No onsite audit is required as the closure evidence relating to documentation is sufficient for offsite closure.		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1621036-201803-M5	Clause & Category (Major/Minor)	RSPO SCCS 5.13.3 Major
Date Issued	19/04/2018	Due Date	17/06/2018
Closed (Yes/No)	Yes	Date of nonconformity closure	15/06/2018
Statement of Nonconformity	Management review for RSPO supply chain has yet to be conducted.		
Requirement Reference	The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 		
Objective Evidence	There was no evidence that management review pertaining to RSPO Supply Chain issues has been conducted.		
Corrections	To update the Managenet Review Precedure (SMP-GPB-06) To conduct Management Review meeting of SCCS, and to ensure the meeting agenda covers all the required information as per the latest Management review Procedure		
Root Cause Analysis	Management review was not conducted due to the Managenet Review Procedure was not updated as per latest SCCS requirements.		
Corrective Action	To ensure the latest procedure is filed and communicated to the management and sustainability team to ensure all the requirements are complied during future management review meetings as well as minute of meeting.		
Assessment Conclusion	The CAP and evidence submitted confirmed that the issue has been fully addressed hence the Major NC was closed on 15/6/2018. No onsite audit is required as the closure evidence relating to documentation is sufficient for offsite closure.		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1621036-201803-M6	Clause & Category (Major/Minor)	RSPO 5.6.1
Date Issued	19/04/2018	Due Date	17/06/2018
Closed (Yes/No)	Yes	Date of nonconformity closure	15/06/2018
Statement of Nonconformity	The assessment of all polluting activities was not adequate.		
Requirement Reference	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent .		
Objective Evidence	At Genting Sabapalm Estate, no assessment related to greenhouse gas emissions was conducted.		
Corrections	To amend and review the current Environmental Aspect and Impact Assessment (EAI) to include the GHG(Greenhouse Gas) as an additional impact follows: "Global Warming/ GHG"		
Root Cause Analysis	GSPE thought that the impact such as "Global Warming" and "Ozone Layer Depletion" are sufficient to cover the "gasesous emission" requirements		
Corrective Action	To review Environmental Aspect And Impact Procedure (SMP-GPB-29) to include GHG as an Impact		
Assessment Conclusion	The CAP and evidence submitted confirmed that the issue has been fully addressed hence the Major NC was closed on 15/6/2018. No onsite audit is required as the closure evidence relating to documentation is sufficient for offsite closure.		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1621036-201803-N1	Clause & Category (Major/Minor)	RSPO 2.2.3
Date Issued	19/04/2018	Due Date	Next annual surveillance assessment
Closed (Yes/No)	No	Date of nonconformity closure	"Open"
Statement of Nonconformity	There is lack of evidence that the decision (to temporary maintain the current situation and stakeholder need to write letter to Genting to own the land) have been accepted with free, prior and informed consent (FPIC).		
Requirement Reference	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).		
Objective Evidence	<p>Based on consultation with stakeholder there's a feedback from the Village Head of Kampung Tembidong-bidong asking the status on conflicted area at the underplanted area within Genting Sabapalm Estate Sapi Division at block 17 and block 8. The area located at the boundary of Kampung Tembidong-bidong smallholders whom overplanted within estate's underplanted area.</p> <p>Further trail of stakeholder's feedback revealed that Genting Sabapalm Estate management has conducted meeting with affected stakeholder as per record available i.e. Mesyuarat dengan orang berkepentingan (Kampung Tembidong-bidong) Terlebih tanam di Kawasan Ladang Genting Sabapalm; Date: 11/7/2015; Attendance: Sim Gik Tzi (Estate Manager); Jalaluddin Harun; Balatos Kalamang; Jaafar Saratin; Nasry Kalamang; Sapuddin Ungkil; Kevin Yam Tuck Cheong (AM); Alian John Moncal; Pawajang Pamalu.</p> <p>Based on the minutes of meeting records, the decision by then Estate Manager was to temporary maintain the current situation and stakeholder need to write letter to Genting to own the land.</p> <p>Sighted too the mapping of underplanted area within Sabapalm Estate Sapi Division block 8 and block 17 which currently overplanted by the following smallholders:</p> <ul style="list-style-type: none"> - Balatos bin Kolomong: 1.31 ha - Nasry bin Kolomong: 0.41 ha - Jaafar bin Haji Saratin: 0.13 ha - Sapuddin bin Harun: 0.15 ha - Jalaluddin bin Harun: 0.67 ha - Balatos bin Kolomong: 0.47 ha - Nasry bin Kolomong: 0.41 ha - Jaafar bin Haji Saratin: 0.13 ha - Sapuddin bin Harun: 0.15 ha - Jalaluddin bin Harun: 0.67 ha - Balatos bin Kolomong: 0.84 ha <p>Totalling the area of 4.28 ha.</p> <p>There's also incomplete records of smallholders ownership sighted as following:</p>		

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	<p>- Letter from officer of Jabatan Tanah dan Ukur Sabah, Malaysia; Surat pengesahan permohonan tanah (to Pegawai Penguasa Pertanian, Beluran); Ref. # 32/2/Vol.2/50 RJA/har; date: 14/7/1986; by Penolong Pemungut Hasil Tanah, Beluran.</p> <p>- Letter to Juru Ukur Daerah, Sandakan; Pemelihara Huran, Sandakan; Pegawai Pertanian Kanan, Sandakan; Ref. # 12/12/Vol.6/95; Date: 9/1/1985; for acknowledgement of PT85080061 seluas 3ha untuk pertanian</p> <p>- MPOB license (expired) # 418121-101000; Nasri bin Kalamang; Menjual & Mengalih; validity: 8/5/2008-30/4/2013; Lot PT83081637 Nangoh, Labuk/Sugut, Daerah Sandakan, Sabah; Total area: 0.81ha; date: 4/5/2011</p> <p>Although the evidence from the minutes of meeting records mentioned that the decision by then Estate Manager was to temporary maintain the current situation and stakeholder need to write letter to Genting to own the land i.e. in other meaning was that Genting Sabapalm Estate allowed the smallholders to continue use Genting’s underplanted area however the feedback by village representative, minutes of meeting records and mapping records shown lack of evidence that the decision have been accepted with free, prior and informed consent (FPIC).</p>
<p>Corrections</p>	<p>To conduct meeting with the affected stakeholders to discuss the land encroachment issue and confirm the resolution/negotiated agreement with participation by top management.</p> <p>All relavant record ie, attendance record, photos etc to be documented and filed securely for future reference.</p> <p>To update estate map and area statement to show the “underplanted or “encroached” areas clearly.</p>
<p>Root Cause Analysis</p>	<p>No records of agreement for both parties on the land encroachment issue.</p> <p>GSPE misplaced the attendance record of meeting with the village representatives.</p> <p>The encroachment areas are missed to be shown in GPS map and area statement accordingly ie as “underplanted”</p>
<p>Corrective Action</p>	<p>All evidence of communication, report, photos and any agreement must be kept securely(in form of hard and soft copy) for future reference.</p> <p>To ensure resolution/negotiated agreements are available as part of evidence that any decision by both parties are accepted with FPIC(as per Negotatiob & Compensation Procedure SMP-GPB-18</p>
<p>Assessment Conclusion</p>	<p>The corrective action plan is accepted. Effectiveness of corrective action taken will be verified in the next audit.</p>

Opportunity for Improvements	
OFI #	Description
OFI 1	NIL

Positive Findings	
PF #	Description
PF 1	Positive comments from all stakeholders interviewed
PF 2	All personnel were cooperative during the assessment process

3.4.1 Status of Nonconformities Previously Identified and Observations

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1463422-201704-M1	Clause & Category (Major/Minor)	RSPO 6.1.3 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	23/5/2017
Statement of Nonconformity	Social management plan is not develop comprehensively.		
Requirement Reference	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.		
Objective Evidence	Social Management and Monitoring Plan which updated on 1/4/2017 has not incorporated the issues or impact identified from the consultation with the affected stakeholders. The existing plan only recorded plan such as updating list of stakeholder, organize stakeholder meeting and etc.		
Corrective Action	<p>The system information has been updated accordingly on the 17/04/2017. Estate person in-charge will be given more guidance and clear exposure on the social management plan (SMP) procedure and new format implementation.</p> <p>The dateline for updating the Social Management and Monitoring Plan will be on 17/04/2017. Monitoring will be done by the Estate Sustainability Coordinator.</p> <p>The CAP and evidence has been submitted and an on-site visit was carried out on 23/5/2017 for major closure. Evidence submitted verified and on-site verification updates :</p> <ol style="list-style-type: none"> The social management plan has incorporated various social activities such as internal & external stakeholder meeting, complaints, worker committee and etc. Comment, action to be taken and status in the plan showing the latest progress the issue and how it being monitored Verified the action taken in the plan through interviewed the workers and village; <p>It has confirmed that the issue has been fully addressed hence the Major NC was closed on 23/5/2017.</p>		
Assessment Conclusion	No recurrence of issue found during on-site assessment. The CAP confirmed to be effectively implemented.		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1463422-201704-M2	Clause & Category (Major/Minor)	RSPO 5.6.2 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	23/5/2017
Statement of Nonconformity	Workers' contract is not managed effectively.		
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.		
Objective Evidence	In GSPE, the extension contract stated that all the terms were according to the initial contract of employment signed. However the initial contract already obsolete due to the establishment of new contract template (rev: 2; date 01/08/2016). The new contract has different terms such as minimum wages. All existing workers in estate did not sign the new contract even though a training has been conducted to explain on the new contract terms and conditions on 29 March 2017.		
Corrective Action	<p>Any new updates on workers contract agreement have to be made to all existing workers contract agreement, and they have to acknowledge and re-signed the document. Corrective action have been made immediately on the 17 April 2017. Workers recruited before 1st August 2016, have acknowledged on the new additional and amendment made on the workers contract agreement, and have initial on the document</p> <p>The CAP and evidence has been submitted and an on-site visit was carried out on 23/5/2017 for major closure. Evidence submitted verified and on-site verification updates :</p> <ul style="list-style-type: none"> a. All the workers' contract have updated to version rev: 2; date 01/08/2016; b. Interviewed the workers and they aware of the changes of the new contract. <p>It has confirmed that the issue has been fully addressed hence the Major NC was closed on 23/5/2017.</p>		
Assessment Conclusion	No recurrence of issue found during on-site assessment. The CAP confirmed to be effectively implemented.		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1463422-201704-M3	Clause & Category (Major/Minor)	RSPO 6.10.2 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	23/5/2017
Statement of Nonconformity	No documented evidence that millers have explained FFB pricing, and pricing mechanisms to the smallholders.		
Requirement Reference	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).		
Objective Evidence	There is no evidence that the mill have explained FFB pricing, and pricing mechanisms for FFB and inputs/services. Only new FFB supplier questionnaire (PM-MKT-04-F01-0) use for smallholder during application.		
Corrective Action	<ol style="list-style-type: none"> 1. To prepare the External FFB Procurement/Pricing Policy Agreement for SVP Marketing approval. 2. To conduct FFB Supplier/stakeholder meeting to explain the pricing mechanism. 3. Any new FFB supplier will be brief the pricing mechanism and get their acknowledgement in the agreement. <p>The CAP and evidence has been submitted and an on-site visit was carried out on 23/5/2017 for major closure. Evidence submitted verified and on-site verification updates :</p> <ol style="list-style-type: none"> a. External Fresh Fruit Bunch (FFB) Procurement Policy Agreement incorporating the pricing mechanism has been documented for the smallholders. b. The supplier/stakeholder meeting to explain the pricing mechanism conducted on 11 May 2017. Attendance and meeting sighted during site visit. c. Interviewed the smallhodler and they aware of the pricing mechanism; they also signed the agreement for the pricing mechanism. <p>The CAP would be considered as the ongoing plan and the effective will be verified in its next surveillance audit. It has confirmed that the issue has been fully addressed hence the Major NC was closed on 23/5/2017.</p>		
Assessment Conclusion	No recurrence of issue found during on-site assessment. The CAP confirmed to be effectively implemented.		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1463422-201704-N1	Clause & Category (Major/Minor)	RSPO 6.2.3 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	18/04/2018
Statement of Nonconformity	No records of actions taken in response to input from stakeholders.		
Requirement Reference	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.		
Objective Evidence	Stakeholder meeting minutes which recorded all the issues raised up by stakeholders, action and person in charge. However, no records of actions taken in response to input from stakeholders For example, a. Internal stakeholder meeting dated 16 March 2017- Repairing of drain in the canteen; fencing of the sundry shop for safety purpose External stakeholder meeting dated 11 March 2017- Instruction from mill to smallholder for using net during transportation of FFB.		
Corrective Action	<p>a. The system information has been updated accordingly on the 17/04/2017. Estate person in-charge will be given more guidance and clear exposure on the social management plan (SMP) procedure and new format implementation.</p> <p>b. To define the issue properly with the attachment of evidence.</p> <p>c. The proper action for social management plan was updated on 17 April 2017</p> <p>d. To incorporate the new format in the upcoming stakeholder meeting minutes.</p> <p>The CAP has been submitted on 23/5/2017. Effectiveness of corrective action taken will be verified in the next audit.</p>		
Assessment Conclusion	<p>Latest stakeholder list (Stakeholder list March 2018) sighted available including communication records of following:</p> <ul style="list-style-type: none"> - External stakeholder meeting 12/3/2018 GSPE - Internal stakeholder meeting 11/4/2018 combined; Labuk Club, Genting Sabapalm <p>Thus, the minor NC is closed on 18/04/2018.</p>		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1463422-201704-N2	Clause & Category (Major/Minor)	RSPO 4.7.3 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	18/04/2018
Statement of Nonconformity	Adequate and appropriate protective equipment was not made available to the workers at workplace to cover all potential hazardous operations.		
Requirement Reference	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.		
Objective Evidence	<ul style="list-style-type: none"> a. During site visit at FFB grading area (GSOM), found that: FFB graders were not wearing appropriate safety helmet b. FFB helper from GSPE (E10826) was not wearing appropriate safety shoes Safety shoes that used by FFB graders (E00249 and E00254) were not in good condition.		
Corrective Action	<ul style="list-style-type: none"> a. Existing SOP mention that the grader should wear safety helmet and we amend on the SOP for the Grader wear the suitable cap. b. Safety boots was purchased and given to the ramp FFB grader on the 16th April 2017 c. To follow up with supplier on the delivery of the safety shoes d. To retrain the graders according the new SOP of the wearing suitable cap when grading in progress. e. All ramp FFB grader to be given proper PPE before working on the mill FFB ramp. f. To re-evaluate the service of the supplier. The CAP has been submitted on 23/5/2017. Effectiveness of corrective action taken will be verified in the next audit.		
Assessment Conclusion	All the action was found adequate. During site visit, all the PPE were adequate. No recurrence happened. Hence, the Minor NC was closed on 18/04/2018.		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1463422-201704-N3	Clause & Category (Major/Minor)	RSPO 4.7.5 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	18/04/2018
Statement of Nonconformity	The first aid items expiring date were not monitored effectively.		
Requirement Reference	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.		
Objective Evidence	First aid box provided at harvesting area and was inspected by HA on Nov 2016. However, the expired items (expired in July 2016 and Dec 2016) were still kept inside the first aid box no. 19.		
Corrective Action	The first aid box was immediately updated on the 11th April 2017. Estate health assistant to send alert to Assistant Manager & Field Supervisor when a first aid box failed to send back to the clinic every month for inspection. The CAP has been submitted on 23/5/2017. Effectiveness of corrective action taken will be verified in the next audit.		
Assessment Conclusion	During site visit at mill and estate, all the first aid boxes were found available. Hence the minor was closed on 18/04/2018.		

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)
Minor 1 – 6.5.3 (previous CB)	Minor	20/08/2015	Closed out on 23/05/2017
1463422-201704-M1	Major	12/04/2017	Closed out on 23/05/2017
1463422-201704-M2	Major	12/04/2017	Closed out on 23/05/2017
1463422-201704-M3	Major	12/04/2017	Closed out on 23/05/2017
1463422-201704-N1 (6.2.3)	Minor	12/04/2017	Closed out on 18/04/2018
1463422-201704-N2 (4.7.3)	Minor	12/04/2017	Closed out on 18/04/2018
1463422-201704-N3 (4.7.5)	Minor	12/04/2017	Closed out on 18/04/2018
1621036-201803-M1 (SC 5.3.1)	Major	19/04/2018	Closed out on 15/06/2018
1621036-201803-M2 (SC 5.3.2)	Major	19/04/2018	Closed out on 15/06/2018
1621036-201803-M3 (SC 5.13.1)	Major	19/04/2018	Closed out on 15/06/2018
1621036-201803-M4 (SC 5.13.2)	Major	19/04/2018	Closed out on 15/06/2018
1621036-201803-M5 (SC 5.13.3)	Major	19/04/2018	Closed out on 15/06/2018
1621036-201803-M6 (5.6.1)	Major	19/04/2018	Closed out on 15/06/2018
1621036-201803-N1 (2.2.3)	Minor	19/04/2018	“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 Sabapalm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

List of Stakeholders Contacted	
<p>Internal Stakeholders</p> <p>Workers’ Representative</p> <p>Women’s Representative</p> <p>Harvesters</p> <p>Mill Operators</p> <p>Sprayers</p>	<p>Union/Contractors/Local Communities</p> <p>Village Head Kg. Tembidong Bidong</p> <p>Village Head Kg. Tagas Tagas</p> <p>Village Head Kg.Lumantik</p> <p>Contractors</p> <p>Smallholders</p>
<p>Government Departments</p> <p>Balai Polis Tagas Tagas</p> <p>SK Ladang Sabapalm</p> <p>Humana School</p>	<p>NGO</p> <p>-Nil-</p>

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IS #	Description
1	<p>Feedbacks: Kampung Tembidong Bidong - Boundary issue with some villagers land (7 villagers) – MPOB licensed oil palm tree - Tamu – contribution for road repair Kampung Tagas Tagas - Road maintenance – genting maintain Kampung Lumantik - Boundary issue with some villagers land (7 villagers) – MPOB licensed oil palm tree</p> <p>Management Responses: The management will continue to maintain good relationship with the local communities</p> <p>Audit Team Findings: No other issue.</p>
2	<p>Feedbacks: School transport – due to road condition – student transport through lorry</p> <p>Management Responses: Student transport through lorry only during heavy rain season, in case bus unable to move on the slippery road.</p> <p>Audit Team Findings: No other issue.</p>
3	<p>Feedbacks: SK Ladang Sabapalm since 1974 – 96 student, 12 teacher - Contribution within budget (RM500/year) - Building belong to Genting, Department of Education cannot support due to ownership - Preschool building – rewiring, fan, lighting – incomplete - Library – unsafe condition for use</p> <p>Management Responses: The management will continue to maintain good relationship with the school.</p> <p>Audit Team Findings: No other issue.</p>
4	<p>Feedbacks: Humana school – 120 student – 4 teacher - Humana establish in Sabapalm since 2015</p> <p>Management Responses: The management will continue to maintain good relationship with them.</p> <p>Audit Team Findings: No other issue.</p>
5	<p>Feedbacks: Klinik kesihatan Tagas Tagas - No major issue</p> <p>Management Responses: The management will continue to maintain good relationship with them.</p> <p>Audit Team Findings: No other issue.</p>
6	<p>Feedbacks: Balai Polis Tagas Tagas - No major issue</p> <p>Management Responses: The management will continue to ensure good relationship</p> <p>Audit Team Findings: No other issue.</p>

Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Genting Sabapalm Oil Mill Certification Unit has complied with the RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Genting Sabapalm Oil Mill Certification Unit is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mr Mohd Hafiz Mat Hussain	Name: Mr. Tan Cheng Huat
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: Genting Plantations Berhad
Title: Lead auditor	Title: Senior Vice President – Plantation (Malaysia)
Signature: 	Signature: <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
Date: 29/07/2018	Date: 13/08/2018

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Commitment to Transparency			
Criterion 1.1:			
Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	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 could be access by the stakeholders to all the stakeholders during stakeholder meeting or by posted to the stakeholders. The documents that could be access are such as all the policies, SEIA report and the management plan, complaint & grievances procedure. Interviewed with the stakeholders such as contractor, local communities and internal workers confirmed that they are aware of it and understood that they have the rights to participate in the decision making.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	Genting Plantations Berhad has developed Procedures on Request and Responses, Doc. No. SMP-GPB-25, Rev. 0 dated 14/8/2014. 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.	Complied
Criterion 1.2:			
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.			

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Criterion / Indicator	Assessment Findings	Compliance	
1.2.1	<p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p>	<p>Genting Plantations Berhad is open to all the 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 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: www.gentingplantations.com.</p>	Complied
<p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p>			
1.3.1	<p>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.</p> <p>-Minor compliance</p>	<p>Documented as Ethical Conduct and Integrity Policy, signed by Genting Plantations President & COO dated 22/6/2015. Displayed on notice boards at strategic area within mill and estate offices. Policy was regularly communicated during daily morning muster or rollcall at both mill and estates respectively as per records and verification through interview with workers.</p>	Complied
<p>Principle 2: Compliance with applicable laws and regulations</p>			
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p>Evidence of compliance with relevant legal requirements shall be available.</p> <p>- Major compliance -</p>	<p>Genting Sabapalm continues to commit to comply all the relevant legal requirements. Among the evidence (license/permits) verified during the assessment were:</p> <ul style="list-style-type: none"> • Permit Potongan Daripada Gaji Pekerja, Seksyen 113(4), Ordinan Buruh (Sabah Bab 67), validity 28/7/2017 to 27/7/2018 • Lesen untuk Menggaji Pekerja Bukan Pemastautin, Seksyen 118, Ordinan Buruh, validity 13/8/2017 to 12/8/2018 • MPOB License #523495002000, Menjual dan mengalih FFB, validity 1/10/2017 to 30/9/2018, area: 4,360.33 Ha, holder: Genting Plantations Berhad, Genting Sabapalm Estate. 	Complied

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Criterion / Indicator	Assessment Findings	Compliance
2.1.2 A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	<p>GSPE List of applicable legal documented under LRR @ legal requirement register, SMP-GPB-22. The latest revision of register, rev:4 dated 10/8/16 was made available for verification. The latest Minimum Wages Order 2016 has been incorporated in the register.</p> <p>GSOM List of applicable legal documented under, rev:7, SO-MGR-03-F01 dated December 2016. Latest legal requirement for mill operation has been updated, i.e FMA, Person In Charge Regulation 2014.</p>	Complied
2.1.3 A mechanism for ensuring compliance shall be implemented. - Minor compliance -	<p>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.</p> <p>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.</p> <p>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.</p> <p>The estate updates the list of relevant laws and regulations that are required to maintain various legal permits.</p>	Complied
2.1.4 A system for tracking any changes in the law shall be implemented. - Minor compliance -	<p>The process of law changes as follows:</p> <ul style="list-style-type: none"> i) Notification of changes from various source of information i.e. lawnett, government gazette and sustainability team/HQ. ii) Monitoring for changes in the Law iii) Clarification and review on the changes iv) Updating of the Legal register administered internally v) Notification to the operating units and/or the relevant person in charge <p>The established legal register has incorporated the latest changes of law.</p>	Complied
<p>Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p>		
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 -	Land title is available.	Complied
2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	Legal perimeter boundary markers have been clearly demarcated and maintained. Sighted the wooden peg at Blok 8, P2017.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>2.2.3</p> <p>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 -</p>	<p>Based on consultation with stakeholder there's a feedback from the Village Head of Kampung Tembidong-bidong asking the status on conflicted area at the underplanted area within Genting Sabapalm Estate Sapi Division at block 17 and block 8. The area located at the boundary of Kampung Tembidong-bidong smallholders whom overplanted within estate's underplanted area.</p> <p>Further trail of stakeholder's feedback revealed that Genting Sabapalm Estate management has conducted meeting with affected stakeholder as per record available i.e. <i>Mesyuarat dengan orang berkepentingan (Kampung Tembidong-bidong) Terlebih tanam di Kawasan Ladang Genting Sabapalm</i>; Date: 11/7/2015; Attendance: Sim Gik Tzi (Estate Manager); Jalaluddin Harun; Balatos Kalamang; Jaafar Saratin; Nasry Kalamang; Sapuddin Ungkil; Kevin Yam Tuck Cheong (AM); Alian John Moncal; Pawajang Pamalu.</p> <p>Based on the minutes of meeting records, the decision by then Estate Manager was to temporary maintain the current situation and stakeholder need to write letter to Genting to own the land.</p> <p>Sighted too the mapping of underplanted area within Sabapalm Estate Sapi Division block 8 and block 17 which currently overplanted by the following smallholders:</p> <ul style="list-style-type: none"> - Balatos bin Kolomong: 1.31 ha - Nasry bin Kolomong: 0.41 ha - Jaafar bin Jaji Saratin: 0.13 ha - Sapuddin bin Harun: 0.15 ha - Jalaluddin bin Harun: 0.67 ha - Balatos bin Kolomong: 0.47 ha - Nasry bin Kolomong: 0.41 ha - Jaafar bin Haji Saratin: 0.13 ha - Sapuddin bin Harun: 0.15 ha - Jalaluddin bin Harun: 0.67 ha - Balatos bin Kolomong: 0.84 ha 	<p>Minor noncomformance</p>

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	<p>Totalling the area of 4.28 ha. There's also incomplete records of smallholders ownership sighted as following:</p> <ul style="list-style-type: none"> - Letter from officer of <i>Jabatan Tanah dan Ukur Sabah, Malaysia; Surat pengesahan permohonan tanah (to Pegawai Penguasa Pertanian, Beluran); Ref. # 32/2/Vol.2/50 RJA/har; date: 14/7/1986; by Penolong Pemungut Hasil Tanah, Beluran.</i> - Letter to <i>Juru Ukur Daerah, Sandakan; Pemelihara Huran, Sandakan; Pegawai Pertanian Kanan, Sandakan; Ref. # 12/12/Vol.6/95; Date: 9/1/1985; for acknowledgement of PT85080061 seluas 3ha untuk pertanian</i> - MPOB license (expired) # 418121-101000; Nasri bin Kalamang; Menjual & Mengalih; validity: 8/5/2008-30/4/2013; Lot PT83081637 Nangoh, Labuk/Sugut, Daerah Sandakan, Sabah; Total area: 0.81ha; date: 4/5/2011 <p>Although the evidence from the minutes of meeting records mentioned that the decision by then Estate Manager was to temporary maintain the current situation and stakeholder need to write letter to Genting to own the land i.e. in other meaning was that GentingSabapalm Estate allowed the smallholders to continue use Genting's underplanted area however the feedback by village representative, minutes of meeting records and mapping records shown lack of evidence that these have been accepted with free, prior and informed consent (FPIC).</p> <p>Hence, a minor noncomformity has been raised on this matter.</p>	
2.2.4	<p>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</p>	Complied
2.2.5	<p>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</p>	Complied
2.2.6	<p>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</p>	Complied
<p>Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.</p>		

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Criterion / Indicator	Assessment Findings	Compliance
<p>2.3.1</p> <p>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 -</p>	<p>Sighted too the mapping of underplanted area within Sabapalm Estate Sapi Division block 8 and block 17 which currently overplanted by the following smallholders:</p> <ul style="list-style-type: none"> - Balatos bin Kolomong: 1.31 ha - Nasry bin Kolomong: 0.41 ha - Jaafar bin Jaji Saratin: 0.13 ha - Sapuddin bin Harun: 0.15 ha - Jalaluddin bin Harun: 0.67 ha - Balatos bin Kolomong: 0.47 ha - Nasry bin Kolomong: 0.41 ha - Jaafar bin Haji Saratin: 0.13 ha - Sapuddin bin Harun: 0.15 ha - Jalaluddin bin Harun: 0.67 ha - Balatos bin Kolomong: 0.84 ha <p>Totalling the area of 5.34 ha.</p>	<p>Complied</p>
<p>2.3.2</p> <p>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 -</p>	<p>Genting Sabapalm Estate management has conducted meeting with affected stakeholder as per record available i.e. <i>Mesyuarat dengan orang berkepentingan (Kampung Tembidong-bidong) Terlebih tanam di Kawasan Ladang Genting Sabapalm</i>; Date: 11/7/2015; Attendance: Sim Gik Tzi (Estate Manager); Jalaluddin Harun; Balatos Kalamang; Jaafar Saratin; Nasry Kalamang; Sapuddin Ungkil; Kevin Yam Tuck Cheong (AM); Alian John Moncal; Pawajang Pamalu.</p> <p>Based on the minutes of meeting records, the decision by then Estate Manager was to temporary maintain the current situation and stakeholder need to write letter to Genting to own the land.</p> <p>This has been raised as minor noncompliance under indicator 2.2.3.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
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	<p>Genting Sabapalm Estate management has conducted meeting with affected stakeholder as per record available i.e. <i>Mesyuarat dengan orang berkepentingan (Kampung Tembidong-bidong) Terlebih tanam di Kawasan Ladang Genting Sabapalm</i>; Date: 11/7/2015; Attendance: Sim Gik Tzi (Estate Manager); Jalaluddin Harun; Balatos Kalamang; Jaafar Saratin; Nasry Kalamang; Sapuddin Ungkil; Kevin Yam Tuck Cheong (AM); Alian John Moncal; Pawajang Pamalu.</p> <p>Based on the minutes of meeting records, the decision by then Estate Manager was to temporary maintain the current situation and stakeholder need to write letter to Genting to own the land.</p> <p>This has been raised as minor noncompliance under indicator 2.2.3.</p>	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	<p>Genting Sabapalm Estate management has conducted meeting with affected stakeholder as per record available i.e. <i>Mesyuarat dengan orang berkepentingan (Kampung Tembidong-bidong) Terlebih tanam di Kawasan Ladang Genting Sabapalm</i>; Date: 11/7/2015; Attendance: Sim Gik Tzi (Estate Manager); Jalaluddin Harun; Balatos Kalamang; Jaafar Saratin; Nasry Kalamang; Sapuddin Ungkil; Kevin Yam Tuck Cheong (AM); Alian John Moncal; Pawajang Pamalu.</p> <p>Based on the minutes of meeting records, the decision by then Estate Manager was to temporary maintain the current situation and stakeholder need to write letter to Genting to own the land.</p> <p>This has been raised as minor noncompliance under indicator 2.2.3.</p>	Complied
Principle 3: Commitment to long-term economic and financial viability		
Criterion 3.1: There is an implemented management plan that aims 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 -	<p>Annual business plan in the form of annual budget and the projection for 4 years (2018-2021) was prepared as guidance for future planning. The business plan contains Processing cost, FFB received, CPO production, PK production, utilisation and capital expenditure.</p> <p>Sample of CAPEX for 2018:</p> <ol style="list-style-type: none"> 1. Construct new labour quarters 2. Construct new biogas plant 3. Install Electrostatic Precipitator <p>Construct SESB Transformer</p>	Complied

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Criterion / Indicator		Assessment 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 -	5 years replanting plan was established for both estate visited. <table border="1"> <thead> <tr> <th>Estate</th> <th>Year</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr> <td rowspan="5">GSPE</td> <td>2018</td> <td>100.90 Ha</td> </tr> <tr> <td>2019</td> <td>237.42 Ha</td> </tr> <tr> <td>2020</td> <td>272.19 Ha</td> </tr> <tr> <td>2021</td> <td>157.30 Ha</td> </tr> <tr> <td>2022</td> <td>204.01 Ha</td> </tr> </tbody> </table>	Estate	Year	Hectarage	GSPE	2018	100.90 Ha	2019	237.42 Ha	2020	272.19 Ha	2021	157.30 Ha	2022	204.01 Ha	Complied
Estate	Year	Hectarage															
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Principle 4: Use of appropriate best practices by growers and millers																	
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.																	
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	At GSOM, the procedure was established and maintained. No new procedure or amended procedure after the previous assessment. There was 3 tiers of procedure that established which were Procedure Manual, System Procedure, Standard Operating Manual, Safe Operating Procedure and Environmental Control Procedure. At Genting Sabapalm 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.	Complied														
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	The management check through internal audit. Internal audit was conducted on 22-23/3/2018. Report of Internal Audit for Genting Sabapalm Estate and Mill was found adequate to cover all the documents and activities at the mill and estate.	Complied														
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	All the records of monitoring was found available at office to verify by the external auditors.	Complied														
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	The origins of all third-party sourced FFB was clearly stated in the weighbridge ticket.	Complied														
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.																	

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4.2.1 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 -	GSPE practices good agricultural practices as contained 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. One of the SOP procedures, OPM 7: Manuring of Oil Palm is referred for managing soil fertility. It includes sections on: a) Introduction b) Nursery manuring c) Field Manuring d) Application of Fertiliser e) Fertiliser delivery and Stock Reports for estates f) Fertiliser sampling for analysis g) Manuring Schedule h) Method of application for younger and mature palms	Complied
4.2.2 Records of fertiliser inputs shall be maintained. - Minor compliance -	Progress as at March based on Summary of Fertiliser Application: Immature: 18% of annual program Mature: 9.4% of annual program Verification of Store Requisition & Issuance Note # 16857, 16858 and 16859, the amount of NK Mix B (AS) found to be in accordance with the agronomist recommendation.	Complied
4.2.3 There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	Foliar analysis – report No. PR95/2017, dated 3/6/2017 by Genting Plantation Research Centre, Laboratory Analytical Section, Alor Gajah, SAMM No. 635. Soil analysis result was last reported in 2011 by GPRC (Sabah). Based on clause 2.1 of GPRC’s SOP on Soil Sampling [issue 1, dated 1/12/2017], frequency of soil sampling is once in 5 years.	Complied
4.2.4 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 -	EFB is mainly applied in immature area at a rate of 20 mt/Ha/year – recommended by SVP (Mr. Tan Cheng Huat). Based on EFB Application Summary report, GSPE has completed 36% of progress. POME application was carried out in accordance to the mill’s Land Application method.	Complied
Criterion 4.3: Practices minimise and control erosion and degradation of soils.		

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Criterion / Indicator	Assessment Findings	Compliance																
4.3.1 Maps of any fragile soils shall be available. - Major compliance -	Soil series map available for GPSE. Based on the map, among the soil series were: <ul style="list-style-type: none"> • Lokan • Lungmanis • Kinabatangan • Sapi • Dalit • Tuaran • Weston • Klias There were also soil classified as problematic such as peat and acid sulphate as described in the table below: <table border="1" data-bbox="657 792 1150 981"> <thead> <tr> <th>No</th> <th>Type of Soil</th> <th>Ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Mineral Soil</td> <td>2,822.00</td> <td>64.75</td> </tr> <tr> <td>2</td> <td>Peat Soil</td> <td>1,325.00</td> <td>30.40</td> </tr> <tr> <td>3</td> <td>Acid Sulphate Soil</td> <td>211.58</td> <td>4.85</td> </tr> </tbody> </table>	No	Type of Soil	Ha	%	1	Mineral Soil	2,822.00	64.75	2	Peat Soil	1,325.00	30.40	3	Acid Sulphate Soil	211.58	4.85	Complied
No	Type of Soil	Ha	%															
1	Mineral Soil	2,822.00	64.75															
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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 -	The estate will refer to the following procedures for guidance <ol style="list-style-type: none"> a) OPM 4 : Soil conservation and terracing (rev 2013) b) Steep land Management SMP –GPB-10 The estate also has a file known as File 56: Estate Maps & Satellite Images where the following are identified for reference : <ol style="list-style-type: none"> a) Soil Map b) Slope class map c) Blocking map d) Riparian buffer zone map Soil maps and slope maps were sighted at GSPE.	Complied																
4.3.3 A road maintenance programme shall be in place. - Minor compliance -	Road maintenance programme was available for year 2018. Among the activities for road maintenance were resurfacing, gravelling, road patching, grading & compacting, frond tip cutting, construction of roadside drain. GSE has allocated RM641,002. As at March 2018, RM127,845 has been spent.	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 -	Subsidence of peat soil is minimised through maintenance of water table at 50-75 cm. Based on site visit, the method of measuring were Piezometer and indicator peg. Subsidence rate was recorded yearly. Based on records, Monitoring Point 1: Set on 27/7/2015 – 0 cm subsidence for 2016 & 2017 Monitoring Point 2: Set on 27/9/2016 – 0 cm subsidence for 2017.	Complied																

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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 -	Ever since the previous assessment, there has been no replanting on peat soil. Nevertheless, the estate still maintaining its drainability assessment checklist entitled "Land Preparation for Replanting Work at various diesel proce". Based on the sampled checklist dated 4/12/2017, it has the information about the estimated quantity of new drains to be constructed, drains desilting works and closing old drains.	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 -	Management of fragile and problem soils is guided by the company's Managing Difficult Soil procedure [OPM 13]. Among the strategies included in the procedure were water management, drainage system, management of water level, compaction (road construction and field compaction), planting density, holing for planting, ground management (maintaining soft vegetations).	Complied
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.		
4.4.1 An implemented water management plan shall be in place. - Minor compliance -	<p>Environmental improvement and management plan was established at GSPE (dated 9/3/2018) to include surface water runoff, water quality, chemical application, air quality, zero burning, fertilizer application and waste management. All the mitigation plan (objective) was established to mitigate the pollution identified. For example, construction of terraces, planting of leguminous cover crop, construction of road site pit, clear marking for buffer one area, chemical reduction, zero burning policy, avoid fertilizer application close to waterways, proper landfill site and recyclable waste.</p> <p>The objectives and management plan were communicated during morning muster which was conducted on 7/4/2018.</p> <p>Environmental improvement and management plan (including Water management plan) was established to include water usage and water quality.</p> <p>Water quality analysis was done twice a year. Last was done on 11/1/18 at GSPE. The report shown that the water quality for river show the parameters were within limit (as per national water quality standards for Malaysia, Class III). The analysis was done by Chemsain Konsultan Sdn Bhd.</p>	Complied
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) shall be demonstrated. - Major compliance -	Buffer zone was maintained accordingly. During site visit at P15 Block 2 (GSPE), the riparian was maintained and installed with the signage accordingly.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
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 -	<p>Palm Oil Mill Effluent (POME) treated through anaerobic pond treatment system where the licensed limit for final discharge BOD is 500mg/l for latest compliance schedule (License No:001878), using land application method. Regular monitoring was conducted by the mill by taking the sample of waste water in final discharge point.</p> <p>Effluent final discharge analysis was monitored on monthly basis by accredited 3rd party laboratory (ERALab KT Sdn Bhd). The latest analysis was done on 23/3/18. Sighted the analysis dated 3/4/2018, ref#20180326/04A-04C. BOD recorded at 128 mg/l and complies with the limit stipulated in mill's compliance schedule.</p> <p>In addition, GSOM also required to submit Quarterly Return Report to DOE. Latest quarter (Jan – Mar 2018) was verified. Refer to report dated 5/4/2018</p>	Complied
4.4.4 Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	GSOM was monitored the water consumption on monthly basis for the source of water supply for its mill process usage. Water consumed for 2017 was 1.82m ³	Complied
Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.		
4.5.1 Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	<p>Documented IPM is found in the Oil Palm Manual under 'Pest and disease (revision June 2013) OPM 5. It identified the pest such as :</p> <ul style="list-style-type: none"> a) bagworms b) nettle caterpillars c) Grasshopper d) Rhinoceros beetles e) Bunch moth f) Vertebrates such as rats g) Pest & Diseases in nursery h) Ganoderma <p>The estates also monitors the following for IPM :</p> <ul style="list-style-type: none"> a) Rat damage census b) Beneficial plant planting c) weed management 	Complied
4.5.2 Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	Latest training on IPM was conducted on 9/3/2018, entitled <i>Latihan IPM</i> attended 14 including AM, staff and workers.	Complied
Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment		

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4.6.1 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 the Justification of Pesticide used is sighted in the SMP-GPB-28. It records the : 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 ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Pesticides Usage Monitoring Records 2017: 24,759.10 kg of pesticide 6,383.72 kg of a.i. Total FFB = 96,726 mt 6.34 kg/Ha 1.63 kg a.i./Ha	Complied
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 minimized and part of the IPM programme. To reduce chemical use the following is implemented in GSPE. a) Planting of beneficial plant b) Cattle Documented IPM is found in the Oil Palm Manual under 'Pest and disease (revision June 2013) OPM 5 . It identified the pest such as : a) bagworms b) nettle caterpillars c) Grasshopper d) Rhinoceros beetles e) Bunch moth f) Vertebrates such as rats g) Pest & Diseases in nursery h) Ganoderma It also shows the lifecycles, type of species as well as the chemical, physical and biological control method recommended. Prophylactic used is confined to the spray in the oil palm nursery whereby the seedlings are ensured to be protected.	Complied
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 -	There is no pesticide that are categorised as World Health Organisation Class 1A or 1B at GSPE.	Complied

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<p>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 -</p>	<p>Training for both estates was conducted accordingly. cross refer indicator 4.8.2</p>	<p>Complied</p>
<p>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 -</p>	<p>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.</p>	<p>Complied</p>
<p>4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Sustainability Management Procedure Manual, SMP-GPB-28. GSPE have tried various method of application that is proven methods that minimise risk and impacts. Some of the spray method used are Inter Pump and PB16 with low volume nozzle.</p>	<p>Complied</p>
<p>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 -</p>	<p>No aerial spraying was carried out at GSPE.</p>	<p>Complied</p>
<p>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 -</p>	<p>No associated smallholders. The training for employee was conducted accordingly, cross refer to indicator 4.8.2.</p>	<p>Complied</p>
<p>4.6.10 Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -</p>	<p>Domestic waste was disposed as per SOP (Landfill and domestic waste management, SMP-GPB-12, Rev:01, Dated 1/12/2014) at landfill area, Genting Sabapalm Estate.</p>	<p>Complied</p>
<p>4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -</p>	<p>The medical surveillance for the operators that handle chemical (store keeper) and spraying operators was done on 12/1/18 and 9/6/17 by Klinik Elopura Sdn Bhd. The result show that the operator were fit for work (employee ID:80001277, E10093, E0057, P10032).</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	There is no female sprayers that were pregnant at GSPE	Complied
Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			
4.7.1	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 -	The Occupational Safety And Health Policy was established, signed by President and Chief Operating Officer on 1 st July 2015. The policy was communicated during morning muster which was conducted on 7/4/2018.	Complied
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 -	SOP for HIRARC (SP-MGR-01) was established. The technique was described accordingly in the SOP. The HIRARC was reviewed on 16/3/18 to include all the activities in the estate, for example, the HIRARC for operate bulldozer, handling on buffaloes, mist blower, spraying activity, pruning activity, replanting and chipping, nursery, trunk injection, and vicon activity were sighted.	Complied
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 -	Training was established by the management. Evidence of adequate and appropriate training on safe working practices provided to workers was sighted, for example at GSOM and GSPE: Training on effluent (13/10/17), MSPO/RSPO briefing (10/1/18), Refresher training for first aider (30/10/17), Training for crane station (3/11/17), Training on permit to work and confined space (17/5/17), Risk assessment training (30/6/17), Training for lab operator (25/9/17), training on chemical management (28/8/17), Training on harvesting (7/4/18), training on handling heavy machineries: excavator, lorry and superbull (3/4/18), training on rat baiting (14/3/18), manuring (12/3/18), IPM (9/3/18), spraying (6/3/18) and culling at nursery (10/1/18) During site visit, the PPE was implemented adequate by all the workers and operators.	Complied
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 -	SHC Organization – Chairman : Mill and Estate Manager, SHC secretary: Mill Engineer Records were available confirming that quarterly OSH meetings had been held at the GSOM. Refer OHS meeting minutes (GSOM)– #1/2/18, #22/11/17, #22/8/17 Refer OHS meeting minutes (GSPE)– #20/3/18, #15/12/17, #20/9/2017	Complied

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Criterion / Indicator	Assessment Findings	Compliance															
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 -	The Estates and mill has continued to maintained site specific Plans in the System Procedure, Emergency Response Procedure (SP-MGR-04), Rev:0, Dated 1/8/17) including ERP for oil spillage, fire in the mill, effluent overflow, accident and chemical spillage. Maps showing assembly areas and up-to-date lists of emergency contacts were also established. The fire drill training conducted on 1/4/2017 (GSOM) and 28/3/17 (GSPE) to communicate the Plan. Interviews of staff and workers confirmed understanding of emergency response procedures.	Complied															
4.7.6 All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -	<p>Medical care is provided to all the employees. Local workers are covered under SOCSO scheme while foreign workers are covered under foreign workers compensation scheme.</p> <table border="1" data-bbox="662 891 1273 1332"> <thead> <tr> <th>Insurance</th> <th>Period</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>SOCSO</td> <td>Feb 18, Mar 18</td> <td>GSOM (E00280, E00291, E00163)</td> </tr> <tr> <td>LONPAC Insurance (S/18/WF00/013 721/SDK-65)</td> <td>31/12/2018</td> <td>GSOM (E00198, E00170, E00092)</td> </tr> <tr> <td>SOCSO</td> <td>Feb 18, Mar 18</td> <td>GSPE (E11079, E11080, E00988)</td> </tr> <tr> <td>LONPAC Insurance (CWF-L5014211-F3)</td> <td>31/12/2018</td> <td>GSPE (E00873, E10879, E00273)</td> </tr> </tbody> </table>	Insurance	Period	Remark	SOCSO	Feb 18, Mar 18	GSOM (E00280, E00291, E00163)	LONPAC Insurance (S/18/WF00/013 721/SDK-65)	31/12/2018	GSOM (E00198, E00170, E00092)	SOCSO	Feb 18, Mar 18	GSPE (E11079, E11080, E00988)	LONPAC Insurance (CWF-L5014211-F3)	31/12/2018	GSPE (E00873, E10879, E00273)	Complied
Insurance	Period	Remark															
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4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>All accidents are investigated and reported to Head Office. All the records related to accident were available at mill office.</p> <table border="1" data-bbox="699 1507 1098 1570"> <thead> <tr> <th>Year</th> <th>GSPE</th> <th>GSOM</th> </tr> </thead> <tbody> <tr> <td>2017</td> <td>6</td> <td>54</td> </tr> </tbody> </table> <p>GSPE-JKKP8 was send to DOSH on 15/1/18. GSOM-JKKP8 was send to DOSH on 15/1/18. Accident investigation report for accident happened on 13/7/2017 was kept and available for verified.</p>	Year	GSPE	GSOM	2017	6	54	Complied									
Year	GSPE	GSOM															
2017	6	54															
<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>																	

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Criterion / Indicator	Assessment 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 needs and documentation of the programme. - Major compliance -	Training was established by the management. Evidence of adequate and appropriate training on safe working practices provided to workers was sighted, for example at GSOM and GSPE: Training on effluent (13/10/17), MSPO/RSPO briefing (10/1/18), Refresher training for first aider (30/10/17), Training for crane station (3/11/17), Training on permit to work and confined space (17/5/17), Risk assessment training (30/6/17), Training for lab operator (25/9/17), training on chemical management (28/8/17), Training on harvesting (7/4/18), training on handling heavy machineries: excavator, lorry and superbull (3/4/18), training on rat baiting (14/3/18), manuring (12/3/18), IPM (9/3/18), spraying (6/3/18) and culling at nursery (10/1/18)	Complied
4.8.2 Records of training for each employee shall be maintained. - Minor compliance -	All the records of training was found available at mill and estate office for verification.	Complied
Principle 5: Environmental responsibility and conservation of natural resources and biodiversity		
Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.		
5.1.1 An environmental impact assessment (EIA) shall be documented. - Major compliance -	Environmental aspect and impact register was established to include all the activities. For example, herbicide spraying, manuring, harvesting/pruning, EFB mulching, oil palm thinning, generator set operation and scheduled waste storage, FFB reception, sterilizer, threshing, pressing, clarification, laboratory, workshop and effluent treatment plant. The register was last reviewed in February 2018 (GSPE) and 14/9/2017 (GSOM).	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
5.1.2	<p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.</p> <p>- Minor compliance -</p>	<p>Mill and estate assistant has been appointed as the responsible person to monitor the management plan. The plan was included , herbicide spraying, manuring, harvesting/pruning, EFB mulching, oil palm thinning, generator set operation and scheduled waste storage, FFB reception, sterilizer, threshing, pressing, clarification, laboratory, workshop and effluent treatment plant. The register was last reviewed in February 2018 (GSPE) and 14/9/2017 (GSOM).</p>	Complied
5.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Environmental improvement and management plan was established at GSOM (dated 13/3/2018) to include air pollution, water pollution from mill operations, water pollution from linesite and landfill area, noise pollution, soil pollution, greenhouse gas emissions, waste management and water usage. All the mitigation plan (objective) was established to mitigate the pollution identified. For example, to install SESB, to construct biogas plant, optimize usage and reduce wastage of water, scheduled waste management, continue desilting/desludging on existing land application areas, reduce air particulate emissions and regular maintenance of septic tank.</p> <p>Environmental improvement and management plan was established at GSPE (dated 9/3/2018) to include surface water runoff, water quality, chemical application, air quality, zero burning, fertilizer application and waste management. All the mitigation plan (programme) was established to mitigate the pollution identified. For example, construction of terraces, planting of leguminous cover crop, construction of road site pit, clear marking for buffer one area, chemical reduction, zero burning policy, avoid fertilizer application close to waterways, proper landfill site and recyclable waste.</p>	Complied
<p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p>			
5.2.1	<p>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).</p> <p>- Major compliance -</p>	<p>The assessment namely, "Inventory on HCV sites within Genting Plantation Bhd group estates (Sabah Region 1)" by S.K. Yap Forestry and Landscape Advisory Services on Oct 2009 – July 2010. Only HCV 4.2 and HCV 6 were identified at GSPE. Eg: Labuk and Bangkawat Rivers and burial grounds for local communities within estates.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
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 -	There is no RTE or high biodiversity value at GSPE except for estuarine crocodiles found at Sg Labuk River. The management and monitoring plan for HCV areas was established, last reviewed on 13/4/18. The implementation of signages was sighted (No fishing, no manuring, no spraying, no slashing, no swimming and muslim & Christian cemetery signage).	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 -	There is no RTE or high biodiversity value at GSPE except for estuarine crocodiles found at Sg Labuk River. The management and monitoring plan for HCV areas was established, last reviewed on 13/4/18. The implementation of signages was sighted (No fishing, no manuring, no spraying, no slashing, no swimming and muslim & Christian cemetery signage).	Complied
5.2.4	Where a management plan has been created there shall be ongoing monitoring: • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	There is no RTE or high biodiversity value at GSPE except for estuarine crocodiles found at Sg Labuk River. The management and monitoring plan for HCV areas was established, last reviewed on 13/4/18. The implementation of signages was sighted (No fishing, no manuring, no spraying, no slashing, no swimming and muslim & Christian cemetery signage).	Complied
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 -	Based on the assessment conducted by desktop, interview and field visits, it was verified that there has been no instance of HCV set aside that conflicts with cultural identify, basic needs for local communities and critical for water catchments at these estates.	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Identification, segregation and storage of waste was established (dated 13/4/2018) to include source of waste at workshop, vehicle used spare part store, linesite, office, diesel tank, chemical store, fertilizer store, empty fertilizer bag store, empty container store, lubricant store, scheduled waste store, general store, petrol store, premix store, vehicle washing bay, scrap iron yard, clinic, shops, religious area, landfill area, recyclable waste store, vehicle garage and contractor store.	Complied
5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	The management was carrying out triple rinsing for empty container. The empty container was recycling back to the supplier (G-Planter). The latest recycle was done on 15/11/17. Sighted the letter from DOA as an approved recycle contractor (JP KRP 207/12/471 JLD VI dated 16 Jan 2014).	Complied

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5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	Waste management plan was established by the estate to include pollution source, mitigation plan and monitoring.eg: source of waste and mitigation plan at workshop, vehicle used spare part store, linesite, office, diesel tank, chemical store, fertilizer store, empty fertilizer bag store, empty container store, lubricant store, scheduled waste store, general store, petrol store, premix store, vehicle washing bay, scrap iron yard, clinic, shops, religious area, landfill area, recyclable waste store, vehicle garage and contractor store. The procedure was established (Scheduled waste management, SMP-GPB-11, Rev:0, Dated 11/10/2013). AT GSPE, the last disposal was done on 20/12/17 for SW305 (2.16mt) and SW 410 (0.0536mt) by Legenda Bumimas Sdn Bhd. Sighted the license for the contractor, eg: License No: 003440, expiry:30/4/18. AT GSOM, the last disposal was done on 20/12/2017 for SW409 (0.01mt), SW305 (0.13 mt), SW410 (0.015mt) by Legenda Bumimas Sdn Bhd. Sighted the license for the contractor, eg: License No: 003440, expiry:30/4/18.	Complied
Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.		
5.4.1 A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	Biomass (fiber and shell) were implemented. The quantity of biomass also monitored to achieve the expected percentage of fiber (11%) and shell (5%) quantities being consumed. For 2017, the ratio of renewable energy used was 0.178mt fibre and shell used/mt FFB.	Complied
Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.		
5.5.1 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. - Major compliance -	No trace of burning at latest replanting area was observed.	Complied
5.5.2 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. - Minor compliance -	Not applicable.	Not applicable
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.		

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5.6.1 An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	Boiler stack sampling was carried as per requirements under GSOM compliance schedule. Last two tests: <ul style="list-style-type: none"> Report # MS/GSOM/2018/BOILER NO.3(S3), dated 20/2/2018, for boiler No. 3, result: 0.228 g/Nm³ Report # MS/GSOM/2017/BOILER NO.3(S3), dated 15/8/2017, for boiler No. 3, result: 0.193 g/Nm³ Both samplings were done by Multi-Serve Enterprise. <i>At Genting Sabapalm Estate, no assessment related to greenhouse gas emissions was conducted.</i>	Major nonconformance
5.6.2 Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	For the estate, GHG emissions identified including CO _x , SO _x and NO _x from various sources including fossil fuel, chemical, peat oxidation, sinks, crop sequestration, fertilizer consumptions and sequestration in conservation area. For mill, GHG emission identified from POME, fuel consumption and grid electricity utilization. Significant pollutants and greenhouse gas (GHG) emission reduction/minimization plan for year 2017 dated 16 Jan 2017 has been implemented to minimize the emission of GHG from diesel used, material used and POME. Management plan such as reduce diesel consumption and control fuel feeding.	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 -	Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 is used and the management opted for full version was applied. The report prepared in April 2018. These GHG calculations were done as per certification unit basics including 1 estate and mill. Summary of emissions for 2017: <ul style="list-style-type: none"> i) Emission/ mt CPO= 3.46 tCO₂ e/mt CPO ii) Emission/ mt PK= 3.46 tCO₂ e/mt PK Verification of some of the raw data such as diesel consumption, generation of POME and fertiliser applications showed that the data is authentic.	Complied

Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.

Criterion 6.1:

Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.

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6.1.1 A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	SIA was conducted for mill, GSPE estates on 6th – 8th April 2017 by Genting’s Sustainability Department. The impact assessment was done through consultations of the identified groups of stakeholders such as workers (local and migrant), contractors, villagers and government officers. Among the stakeholders consulted were SK Tagas-Tagas, Tagas-Tagas Police Station, Klinik Kesihatan Tagas-Tagas, Humana, smallholders, Sandakan Energy Commission, DOSH Sandakan, JTK Sandakan and DOE Sandakan.	Complied
6.1.2 There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	It was evidence that the assessment has been done with participation of affected parties as per records of following: - External stakeholder meeting 12/3/2018 GSPE Internal stakeholder meeting 11/4/2018 combined; Labuk Club, Genting Sabapalm	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. - Major compliance -	The estate has generated a Social Management and Monitoring Plan which updated on 1/3/2018. The plan developed has incorporated the status, benchmark, monitoring technique and person to be responsible for the issue. The plan has incorporated the issues/impact identified from the consultation with the affected stakeholders. The existing plan also recorded the updated list of stakeholders (Stakeholder list March 2018), plan to organize stakeholder meeting and etc.	Complied
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 Social Management and Monitoring Plan was reviewed at least once every two years and last was updated on 1/3/2018	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 (n/a) as there is no scheme smallholders involved in the operating units	Not applicable
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.		
6.2.1 Consultation and communication procedures shall be documented. - Major compliance -	Procedure is available entitled Sustainability Management Procedure Manual, Consultation and Communication [SMP-GPB-17, rev. 00, 11/10/2013].	Complied
6.2.2 A management official responsible for these issues shall be nominated. - Minor compliance -	The management official responsible for issues nominated at GSPE – Senior Estate Manager – dated 13/5/2014.	Complied

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6.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Latest stakeholder list (Stakeholder list March 2018) sighted available including communication records of following:</p> <ul style="list-style-type: none"> - External stakeholder meeting 12/3/2018 GSPE Internal stakeholder meeting 11/4/2018 combined; Labuk Club, Genting Sabapalm 	Complied
<p>Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.</p>			
6.3.1	<p>The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.</p> <p>- Major compliance -</p>	<p>Established system sighted available i.e. Sustainability Management Procedure Manual, Complaints and Grievances [SMP-GPB-19, rev. 2, 5/9/2014]</p>	Complied
6.3.2	<p>Documentation of both the process by which a dispute was resolved and the outcome shall be available.</p> <p>- Major compliance –</p>	<p>Complaint forms were available in Complaints/Grievances Record Book. The format includes the information such as name of complainant, passport/NRIC, phone no., address, issue, date of complaint, details of action taken, verification by manager and acknowledgement by complainant.</p>	Complied
<p>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.</p>			
6.4.1	<p>A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.</p> <p>- Major compliance -</p>	<p>GSPE & GSOM has established procedure on negotiation, compensations and handling with doc. No. SMP-GPB-18 dated 5/9/2014. The objective of the procedure is to provide guidelines on handling issues as follow:</p> <ul style="list-style-type: none"> a) Land/ Boundary dispute including NCR related land conflict b) Squatter issue c) Social issue <p>Negotiation will be carried out between estate management and the stakeholders. If negotiation fails, Legal Department in Head Office will be consulted. Any compensation claims will be decided by the HO top management bases on case basis and current value. If negotiation and compensation fails, HQ top management will proceed with legal action against the affected party.</p>	Complied

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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 -	The procedure use was Negotiation and compensation procedure; No. SMP-GPB-18 dated 5/9/2014. Complied
6.4.3	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 -	Except for issues reported in indicator 2.2.3 above, no other issue that involved compensation of claims to any party. Complied
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.		
6.5.1	Documentation of pay and conditions shall be available. - Major compliance -	Documentation of pay and conditions sighted available specified in the workers agreement – RM920/month or RM35.38/day. Mill has employed local and foreign workers. All the workers are under direct employment. Sampled payslip Jan, Feb & Mar 2018: - Employee No.: E00926 - Employee No.: E00078 - Employee No.: E10104 - Employee No.: E10345 Complied
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 -	Employment contract are available in language that understood by workers. The contract has detailing the payments and employment conditions such as period of working, working hour, medical assistance, housing, holiday and annual leave, period of notice and etc. Extension contract for the workers who worked more than 3 years were sampled as below: - Employee No.: E00100 valid until 08/08/2019 - Employee No.: E00049 valid until 08/08/2019 - Employee No.: E00207 valid until 08/08/2019 - Employee No.: E00146 valid until 08/08/2019 In GSPE, the extension contract stated that all the terms were according to the initial contract of employment signed. However the initial contract already obsolete due to the establishment of new contract template (rev: 2; date 01/08/2016). The new contract has different terms such as minimum wages. Induction training was conducted for new recruited workers. Evidence of training materials and attendant lists were sighted. Complied

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Criterion / Indicator	Assessment Findings	Compliance	
6.5.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Adequate housing, water supplies, medical, educational and welfare amenities were provided by the company with continuous maintenance and upgrading as per sighted Capex budget 2018 – Internal Order Activation of CAPEX code:</p> <p>CC ID Code: GSOM181; Buildings – Residential: New-14 blocks of 1x4 Labour Quarters; Internal Order 60.18ASOM001; Amount 2.24m</p>	Complied
6.5.4	<p>Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Sundry shops and canteens were located in the estate. The goods and foods price list was displayed at the shop. Workers to Telupid and Sandakan town once a month to purchase goods and foods.</p>	Complied
<p>Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.6.1	<p>A published statement in local languages recognising freedom of association shall be available.</p> <p>- Major compliance -</p>	<p>GSPE and GSOM have implemented a People Policy dated 3/8/2009 signed by Chief Operating Officer where the workforces have the rights, freedom of association and equal opportunities. The policy was displayed at the notice board outside the office in local language and english. Briefing on all the policies was conducted from 11/4/2018. Attendant list and training material is sighted.</p>	Complied
6.6.2	<p>Minutes of meetings with main trade unions or workers representatives shall be documented.</p> <p>- Minor compliance -</p>	<p>Minutes of meeting sighted available for the latest Union meeting conducted on 26/1/2018 in GSPE.</p>	Complied
<p>Criterion 6.7: Children are not employed or exploited.</p>			
6.7.1	<p>There shall be documentary evidence that minimum age requirements are met.</p> <p>- Major compliance -</p>	<p>Reviewed inspection of employee contract agreement and list of registration confirmed that those employed are as per company policy on minimum age. The minimum working age is 18 and above. During field visit and consultation with stakeholders confirm that there is no child labour at any of the operation sites.</p>	Complied
<p>Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.</p>			
6.8.1	<p>A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.</p> <p>- Major compliance -</p>	<p>GSPE and GSOM have implemented a People Policy dated 3/8/2009 and Social Policy (Incorporating the Labour and Human Rights requirements) dated 22/6/2015 where the workforces have the rights, freedom of association and equal opportunities.</p> <p>No discrimination in terms of hiring, compensation and etc is practice by the management. The policy was displayed at the notice board outside the office. Briefing on all the policies was conducted on 11/4/2018. Attendant list and training material is sighted</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
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 -	Through document reviewed of active employee list found that the management has recruited local and foreign workers which consisted of male and female workers. Total 361 foreign workers and 52 local workers. Female workers consisted of 122 persons whereas 291 persons are male workers as at 1 April 2017.	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 -	Recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. It was noted during the audit that there is no discrimination based on nationality, race, gender, age, etc.	Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			
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 -	GSPE and GSOM have implemented a Sexual Harassment Policy dated 3/8/2009 signed by Chief Operating Officer. The policy was displayed at the notice board outside the office Briefing on all the policies was conducted from 11/4/2018. Attendant list and training material was sighted.	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 -	GSPE & GSOM have implemented a Social Policy (Incorporating the Labour and Human Rights requirements) dated 22/6/2015. In the policy statement, it mentioned that reproductive rights are protected. The policy was displayed at the notice board outside the office. Briefing on all the policies was conducted from 11/4/2018. Attendant list and training material is sighted. Through interviewed with female workers concluded that no cases of reproductive reported thus far.	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 -	GSPE has established a Women's Committee and appointment letters were issued by manager to the committee. Latest meeting was conducted on 11/4/2018. Documented meeting minutes made available during site visit. Through interviewed with chairman and female workers concluded that no sexual harassment cases reported thus far. They well aware of the complaint procedures.	Complied
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	The current and past FFB pricing were displayed at the weighbridge station. The pricing are updated from time to time.	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
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 -	External Fresh Fruit Bunch (FFB) Procurement Policy Agreement incorporating the pricing mechanism has been documented for the smallholders. The supplier/stakeholder meeting to explain the pricing mechanism conducted on 11 May 2017. Attendance and meeting sighted during site visit. Interview of the smallholder and they aware of the pricing mechanism; they also signed the agreement for the pricing mechanism.	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 -	The contractors have signed on contractor’s agreement with the management. Below are the sampled contract agreements: a) Agreement No.: GSOM/OO/G16120001 dated 1/12/2017 b) Agreement No.: GSOM/OO/G16110001 dated 1/12/2017 The contractors have signed on each page of the agreement.	Complied
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	According to the contract agreement, the company shall pay to the contractors within 30 days from the date of issuance of Schedule of Work Completed. Payments records: a) Agreement No.: GSOM/OO/G16120001 dated 1/12/2017; paid on 17/1/2018 b) Agreement No.: GSOM/OO/G16110001 dated 1/12/2017; paid on 17/1/2018. Payment records were sighted available.	Complied
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	Contribution Sample: Hire of school bus transport student to SMK Pamol for March 2018; Description: Welfare & Recreation – Contract Related Works; Agreement # GSOM/GWO/2018/002 - Contribution of Arang (Coal) to Prasekolah SK Tagas-tagas; 11/4/2018 - Contribution of “Asbestos” to Sabapalm Church’ March 2018 Provide additional time to supply electricity to residential worker for “Kenduri Kahwin”	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 –	No schemes smallholder. Only independent smallholders and out-growers. However, GSOM took initiatives in providing training to the smallholders regarding the best practices under RSPO management system on 2/2/2017.	Not applicable
Criterion 6.12: No forms of forced or trafficked labour are used.			

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Criterion / Indicator		Assessment Findings	Compliance
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	GSPE & GSOM have implemented a Social Policy (Incorporating the Labour and Human Rights requirements) dated 22/6/2015. The policy was displayed at the notice board outside the office. Briefing on all the policies was conducted from 03-05 April 2017. Attendant list and training material is sighted. In the policy statement, the management has committed not to use any forced labour or trafficked labour. The workers had signed on the contract of employment where it stated that the passport will be retained by the employer for safety reason. Besides, interviewed the workers also confirmed there is no evidence of forced or trafficked labour are used.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	No evidence of contract of substitution detected in the samples. Interviewed the labour agency and confirmed that the same contract used in foreign country and Malaysia.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	People policy and Social policy is implemented. No temporary workers. Migrant workers are treated equally as per the locals.	Complied
Criterion 6.13: Growers and millers respect human rights.			
6.13.1	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 -	GSPE & GSOM have implemented a Social Policy (Incorporating the Labour and Human Rights requirements) dated 22/6/2015. They are respected and supported the Universal Declaration of Human Rights. Briefing on all the policies was conducted from 11/4/2018. Attendant list and training material is sighted.	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.	There is a HUMANA school in the estates' compound. Parents do not need to pay any school fee. The mill and estates often donated to the school, provide the hall and sound system for the school event. Total 102 students from GSPE and GSOM. Upon request by HUMANA teacher, the management has provided maintenance such as repairing and also disposal of waste. There was budget allocated for HUMANA maintenance and fees sighted in Budget 2017.	Complied
Principle 7: Responsible development of new plantings			
Genting Sabapalm Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance assessment. The immature areas are replanted area.			
Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 8.1: 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
<p>8.1.1</p> <p>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.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • 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. <p>- Major compliance -</p>	<p>Continual Improvement Plan was established. Sample of Continual Improvement for 2018 at GSOM and GSPE:</p> <ol style="list-style-type: none"> 1. Construct new labour quarters 2. Construct new biogas plant 3. Install Electrostatic Precipitator 4. Construct SESB Transformer 5. Minimize use of certain pesticides especially highly toxic pesticides (paraquat) 6. Expand IPM programme through implementing rat control using owl and increase beneficials plants planting point 7. Minimize over spraying at hilly area, no spraying at the riparian buffer zone and establish ground covers at the replanting site 8. Maximizing recycling and minimizing waste or by-products generation 9. Improve condition of tractors 10. Conduct regular meetings with stakeholder to further enhance the communication and feedback 11. To improve land preparation, terracing and mechanization accessibility 	<p>Complied</p>

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Appendix B: Approved Time Bound Plan

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	Status as of 31 March 2018	Any unresolved non-compliances	
1	Genting Plantations (WM) Sdn Bhd & Setiamas Sdn Bhd(100%)for estates Genting Oil Mill Sdn Bhd (100%) for mill	Genting Sri Gading Estate,	Supply base for Genting Ayer Item Oil Mill, Johor, Malaysia	Dec,2014	Certified	None
2		Genting Sungei Rayat Estate,				
3		Genting Kulai Besar Estate,				
4		Genting Tanah Merah Estate,				
5		Genting Tebong Estate,				
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 conversion title 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 Bahagia Sdn Bhd (100%) for estates	Genting Tanjung Estate, Sabah, Malaysia	Supply base for Genting Tanjung Oil Mill, Sabah, Malaysia	Aug,2016	Certified	None
9		Genting Tenegang Estate, Sabah, Malaysia				
10		Genting Layang Estate, Sabah, Malaysia				
11		Genting Bahagia Estate,				
12	Landworthy Sdn Bhd (84%)	Genting Landworthy Estate, Sabah, Malaysia				
13	Genting Tanjung Bahagia Sdn Bhd (100%) for estates	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah Oil Mill, Sabah, Malaysia	Oct 2018		The Remediation and Compensation Procedures is pending for Genting Kencana Estate. LUCA has been passed. Concept Note (CN) for Remediation and Compensation has been submitted to RSPO.
14		Genting Permai Estate, Sabah, Malaysia				
15		Genting Kencana Estate, Sabah, Malaysia				
16	Genting SDC Sdn Bhd (100%) for estate and mill	Genting Jambongan Estate, Sabah, Malaysia	Supply base for Genting Jambongan	Sept 2018		Concept Note and Remediation Plan has been submitted to

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of 31 March 2018	Any unresolved non-compliances
			Oil Mill, Sabah, Malaysia			RSPO. LUCA has been passed. 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	Audited	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	PT SISM – LUCA passed. Concept Note and Remediation Plan submitted and approved by Panel. Action plan to be checked by auditor during the next audit.
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. LUCA submitted and under on-going review.

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	Status as of 31 March 2018	Any unresolved non-compliances
24	PT United Agro Indonesia(60%)	PT UAI 1 & 2 UAI Plasma	Oct, 2023		NPP for PT UAI in progress. In the process of obtaining HGU for UAI.
25	PT Susantri Permai (95%)	Puroh Estate Masaha Estate Zircon Hill Estate SP Plasma	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia Oct, 2022 Oct, 2023		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
26	PT Kapuas Maju Jaya (95%)	Waterfall Estate I & II Muhun Estate I & II Talawang Estate I & II KMJ Plasma	Supply bases for Golden Hill Oil Mill, Kalimantan Indonesia Oct,2022 Oct, 2023		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
27	PT Dwie Warna Karya (95%)	Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate DWK Plasma	Supply base for Golden Hill Oil Mill, Kalimantan Indonesia Oct , 2022 Oct, 2023		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
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 Cemerlang (70%)	AAC 1 & 2 AAC 3 & 4			NPP In Progress. HCV report being reviewed at HCVRN.
31	PT Palma Agro Lestari Jaya (70%)	PALJ Estates PALJ Plasma	Supply base for PALJ Oil Mill*	Aug,2023	NPP In Progress. HCV report under review by HCVRN.

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	Status as of 31 March 2018	Any unresolved non-compliances
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	

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 Sabapalm Oil Mill and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2017 for Genting Sabapalm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	3.46
PK	3.46

Extraction	%
OER	20.72
KER	4.15

Production	t/yr
FFB Process	122,319.63
CPO Produced	25,346.447
PKO Produced	5,073.858

Land Use	Ha
OP Planted Area	3908.20
OP Planted on peat	441.43
Conservation (forested)	8.95
Conservation (non-forested)	
Total	4358.58

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	36046.73	0.38					36046.73	0.38
CO ₂ Emission from fertilizer	3589.90	0.04					3589.90	0.04
NO ₂ Emmision	12842	0.13					12842	0.13
Fuel Consumption	994.01	0.01					994.01	0.01
Peat Oxidation	72967.99	0.76					72967.99	0.76
Sink								
Crop Sequestration	-34167.52	-0.36					-34167.52	-0.36
Conservation Sequestration								
Total	92273.11	0.96					92273.11	0.96

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	8485.44	0.07
Fuel Consumption	1675.51	0.01
Grid Electricity Utilisation	0	0
Credit		
Export of Grid Electricity	-357.60	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	9803.35	0.08

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	17551.50
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	17551.50

*This mill has no kernel crusher operation.

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

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

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

5.1 Applicability of the general chain of custody requirements for the supply chain			
	Requirement	Evidence	Compliance (Yes / No or N/A) For any N/A raised, justification is required.
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Genting Sabapalm Oil Mill has the physically handle the RSPO Certified Sustainable oil palm products. All trading, contract and sales are managed by Marketing Palm Product Department, HQ and held the palmTrace registration number for respective mill (Genting Sabapalm Oil Mill: RSPO_PO1000004650)	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	GSOM is not a trader or distributor.	N/A
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	Genting Plantations Bhd held RSPO membership number: 1-0086-06-000-00 since 14 November 2006. Company has registered in palmTrace system as follows: Members ID – Genting Sabapalm Oil Mill : RSPO_PO1000004650 Licence valid until 8/6/2018 Member category : Oil Mill	Yes
5.1.4	Processing aids do not need to be included within an organization's scope of certification.	Processing aids was not in used at Genting Ayer Item Oil Mill.	Yes
5.2 Supply chain model			
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	Genting Sabapalm oil Mill Model: Mass Balance. The management has established the SOP for Supply Chain, Traceability and Mass Balance (Mill), SMP-GPB-23, Revision:04, Dated 21/11/2014 which covered unique running batch number, supply chain model (MB), training, persons responsible, registration and reporting requirements, RSPO stamps (MB), authorization, delivery/goods received	Yes

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		and flowchart on overview of traceability, mass balance and book keeping procedure. During the period of April 17 – Mar 18, Genting Sabapalm Oil Mill has received and processed FFB from own plantations and outside crop: 102,068.37 mt.	
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Genting Sabapalm Oil Mill was certified with Mass Balance Module.	Yes
5.3. Documented Procedures			
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	Genting Sabapalm oil Mill Model: Mass Balance. The management has established the SOP for Supply Chain, Traceability and Mass Balance (Mill), SMP-GPB-23, Revision:04, Dated 21/11/2014 which covered unique running batch number, supply chain model (MB), training, persons responsible, registration and reporting requirements, RSPO stamps (MB), authorization, delivery/goods received and flowchart on overview of traceability, mass balance and book keeping procedure. However, some of the latest requirements under RSPO SCC System and Standard revised June 2017 have not been incorporated in the SOP such as the requirements of internal audit. Thus, Major NC was raised.	No
	<ul style="list-style-type: none"> • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	Genting Sabapalm Oil Mill has prepared a dedicated records and Forms in relation to RSPO Supply Chain Certification. For example; estate's dispatch note, mass balance worksheet-monthly input, incoming ffb records, outgoing CPO records and outgoing PK records. Refer to clause SC 5.8: Training.	Yes
	<ul style="list-style-type: none"> • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of 	The management has established the SOP for Supply Chain, Traceability and Mass Balance (Mill), SMP-GPB-23, Revision:04, Dated 21/11/2014 which has been identified every responsible personal who involved in the implementation RSPO Supply Chain Certification, for example: Mill	Yes

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	the organization's procedures for the implementation of this standard.	<p>manager, weighbridge operator, chief clerk.</p> <p>Roles and responsibility for RSPO Supply Chain team were clearly defined in the appointment letter. The appointment letter from the Mill Manger dated 2/10/2016 mentioned that General clerk as a person in-charge for supply chain at Genting Sabapalm Oil Mill.</p>	
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<p>The SOP for Supply Chain, Traceability and Mass Balance (Mill), SMP-GPB-23, Revision:04, Dated 21/11/2014 has not clearly stated the requirement for internal audit need to be conducted relating to sustainability and traceability standard (RSPO Supply Chain Certification Standard's requirements).</p>	No
	<p>ii) effectively implements and maintains the standard requirements within its organization</p>	<p>The internal audit for Supply Chain yet to be conducted by GSOM. Thus, Major NC was raised.</p>	No
5.4. Purchasing and goods in			
5.4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit.</p> <p>Genting Sabapalm Oil Mill have system to verify at the weighbridge, all crop from supplying estate and non-certified smallholder within Genting Ayer Item Oil Mill. Sampled of ticket for certified supply base as following:</p> <p>Genting Sabapalm Estate Date: 20/3/2018 Ticket No: 108620 Block No: P9643, P9730 Tonnage:6.65mt Transporter: Estate tractor</p> <p>Date: 14/2/2018 Ticket No: 104179 Block No: P9005, P9003 Tonnage:11.61mt Transporter: Estate tractor</p>	Yes

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		<p>All the ticket number were stamp as RSPO certified FFB (include RSPO supply chain certificate no., supply base, validity period)</p>	
	<ul style="list-style-type: none"> Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit.</p> <p>Genting Sabapalm Oil Mill have system to verify at the weighbridge, all crop from supplying estate and non-certified smallholder within Genting Ayer Item Oil Mill. Sampled of ticket for certified supply base as following:</p> <p>Genting Sabapalm Estate Date: 20/3/2018 Ticket No: 108620 Block No: P9643, P9730 Tonnage:6.65mt Transporter: Internal (Tractor)</p> <p>Date: 14/2/2018 Ticket No: 104179 Block No: P9005, P9003 Tonnage:11.61mt Transporter: Internal (Tractor)</p> <p>All the ticket number were stamp as RSPO certified FFB (include RSPO supply chain certificate no, supply base, validity period)</p>	<p>Yes</p>
	<ul style="list-style-type: none"> The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance. 	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit.</p> <p>Genting Sabapalm Oil Mill have system to verify at the weighbridge, all crop from supplying estate and non-certified smallholder within Genting Ayer Item Oil Mill. Sampled of ticket for certified supply base as following:</p> <p>Genting Sabapalm Estate Date: 20/3/2018 Ticket No: 108620</p>	<p>Yes</p>

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		<p>Block No: P9643, P9730 Tonnage:6.65mt Transporter: Internal (Tractor)</p> <p>Date: 14/2/2018 Ticket No: 104179 Block No: P9005, P9003 Tonnage:11.61mt Transporter: Internal (Tractor)</p> <p>All the ticket number were stamp as RSPO certified FFB (include RSPO supply chain certificate no, supply base, validity period)</p>	
	<ul style="list-style-type: none"> A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. 	Not applicable	N/A
	<ul style="list-style-type: none"> The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. 	Not applicable	N/A
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	The management has established the SOP for Supply Chain, Traceability and Mass Balance (Mill), SMP-GPB-23, Revision:04, Dated 21/11/2014 where it was mentioned about the handling on non-conforming oil palm products.	Yes
5.5. Outsourcing activities			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and</p>	There is no outsourced process within Genting Sabapalm Oil Mill, hence this requirement is not applicable.	N/A

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	instructions for tank movements are controlled by the certified organization (not the tank farm manager).		
5.5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a. The site has legal ownership of all input material to be included in outsourced processes;	There is no outsourced process within Genting Sabapalm Oil Mill, hence this requirement is not applicable.	N/A
	b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.	There is no outsourced process within Genting Sabapalm Oil Mill, hence this requirement is not applicable.	N/A
	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	There is no outsourced process within Genting Sabapalm Oil Mill, hence this requirement is not applicable.	N/A
	d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.	There is no outsourced process within Genting Sabapalm Oil Mill, hence this requirement is not applicable.	N/A
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	There is no outsourced process within Genting Sabapalm Oil Mill, hence this requirement is not applicable.	N/A
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	There is no outsourced process within Genting Sabapalm Oil Mill, hence this requirement is not applicable.	N/A
5.6. Sales and goods out			
5.6.1	The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form. <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; 	All the required information was available in the delivery documents such as receiving slips, MPOB Form L3, Delivery/goods received advice, Authorization form, GSOM CPO/PK Dispatch Checklist, receiving slip, CPO/PK Delivery advice. The RSPO certificate number and validity period can be seen on the stamp in delivery/goods received advice.	Yes

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	<ul style="list-style-type: none"> A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; Supply chain certificate number of the seller; A unique identification number 		
	<ul style="list-style-type: none"> Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	Based on samples delivery documents of contracts # SSD/1017/S02CPO (RSPO MB) and SSD/0318/S02PK (RSPO), all information was complete and can be presented in various documents as mentioned in Indicator 5.6.1 above.	Yes
	<ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. 	All announcement were adequately made in the RSPO Palmtrace. Ever since the last assessment, there were 20 announcements for PK (total volume = 2,824.59 mt) and 1 announcement for CPO (1,590.59 mt).	Yes
5.7. Registration of transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> are mills, traders, crushers and refineries and; take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	<p>The registration of PalmTrace will be carried out by the Marketing Palm Product Department, HQ. All transaction will be registered in the PalmTrace. Company has registered in palmTrace system as follows:</p> <p>Members ID – Genting SabapalmOil Mill : RSPO_PO1000004584 Member category : Oil Mill</p> <p>Genting Plantations Bhd held RSPO membership number: 1-0086-06-000-00 since 14 November 2006.</p>	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / 	<p>Genting Sabapalm Oil Mill has the Procedure for Handling of Certified CPO and PK despatch where it was mentioned that Marketing Palm Products Department shall make the necessary transaction of RSPO certified CPO and PK in the RSPO IT Platform.</p> <p>Sampled the shipping announcement: Buyer: xxxx Transaction ID: TR-d833c5b7-3ac4</p>	Yes

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	Announcement is based on members' own standard operating procedures.	Quantity: 1500 MT Product: CSPO (IP) Shipping/BL Date: 9/10/2017 Status: Confirmed Buyer: xxxx Transaction ID: TR-d56b0c22-955e Quantity: 500 MT Product: CSPO (IP) Shipping/BL Date: 28/3/2017 Status: Confirmed Buyer: xxxx Transaction ID: TR-360fa047-7d71 Quantity: 400 MT Product: CSPK (IP) Shipping/BL Date: 8/9/2017 Status: Confirmed	
	<ul style="list-style-type: none"> Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. 	Every shipping announcement made accordingly as unique id for traceability and recorded accordingly.	Yes
	<ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 	There were volume sold for other scheme and conventional (refer to Table 11 & 12 ; Supply Chain declaration of Table D & E; Summary Template).	Yes
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	Sampled of shipping announcement documents and found that the management done the shipping announcement accordingly.	Yes
5.8. Training			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Training schedule for 2018 was available. Training on supply chain is planned to be conducted in June 2018 and number of targeted trainees is four staff, which basically from the weighbridge and administration clerks.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	Last training entitled "Supply Chain, Traceability and Mass Balance" conducted on 24/10/2017 attended by 4 participants from weighbridge, office and general clerks.	Yes
5.9. Record Keeping			

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5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	Among the relevant records identified by the mill are: <ul style="list-style-type: none"> • Estate’s dispatch Note (for estates with weighbridge) • Estate’s FFB Dispatch Advice (for estates without weighbridge) • Authorization form (e.g. #55276 dated 13/4/2018, #GMMR 30/10/2017) • Mass Balance Worksheet – monthly input • Local Sales Delivery Advice (LSDA) (e.g. #17/04/18/SEOSB/PK dated 17/4/2018, #09/10/17/GMMR/CPO dated 1/11/2017) • Incoming FFB Records (log book) • Outgoing CPO Records (log book) • Outgoing PK Records (log book) 	Yes
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	The retention period to maintain the records and documents related to supply chain is addressed in “List of Operational, Environmental, Social, Safety and Health Records” [SMP-GPB-02-F01-01, dated 2/9/2014]. Sampled weighbridge tickets #FFB16004365W, #FFB16004364W, #FFB16004359W, #FFB16004357W dated 21/4/2016: all were available for verification.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	Not applicable since GSOM is a palm oil mill which products are CPO and PK.	N/A
5.10. Conversion factors			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon N/A past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of	Not applicable	N/A

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	Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.		
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	Not applicable	N/A
5.11. Claims			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	Not in use.	N/A
5.12. Complaints			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	The procedure for complaints (Complaints and grievances procedure, SMP-GPB-19, Rev:02, dated 5/9/14) was established.	Yes
5.13. Management Review			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	No evidence of discussion about SC issues in a management review meeting. Thus, Major NC was raised.	No
5.13.2	The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	Unable to verify since no evidence of discussion about SC issues in a management review meeting. Thus, Major NC was raised.	No
5.13.3	The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	Unable to verify since no evidence of discussion about SC issues in a management review meeting. Thus, Major NC was raised.	No

Appendix E: Genting Sabapalm Oil Mill Supply Chain Assessment (Module E - CPO Mills: Mass Balance)

Requirements	Compliance
E.1 Definition	
<p>E.1.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Genting Sabapalm Oil Mill receives and process both certified and noncertified FFB (Own estate -75% and outsider (25%)). Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO Certified Products.</p>
E.2 Explanation	
<p>E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>
<p>E.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>
E.3 Documented procedures	
<p>E.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</p>	<p>The management has established the SOP for Supply Chain, Traceability and Mass Balance (Mill), SMP-GPB-23, Revision:04, Dated 21/11/2014 which covered unique running batch number, supply chain model (MB), training, persons responsible, registration and reporting requirements, RSPO stamps (MB), authorization, delivery/goods received and flowchart on overview of traceability, mass balance and book keeping procedure.</p> <p>The procedure has been identified every responsible personal who involved in the implementation RSPO Supply Chain Certification, for example: Mill manager, assistant Mill Manager, weighbridge operator, chief clerk.</p> <p>Roles and responsibility for RSPO Supply Chain team were clearly defined in the appointment letter.</p> <p>The appointment letter from the Mill Manager dated 2/10/2016 mentioned that General clerk as a person in-charge for supply chain at Genting Sabapalm Oil Mill.</p>

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<p>E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>The management has established the SOP for Supply Chain, Traceability and Mass Balance (Mill), SMP-GPB-23, Revision:04, Dated 21/11/2014 which covered unique running batch number, supply chain model (MB), training, persons responsible, registration and reporting requirements, RSPO stamps (MB), authorization, delivery/goods received and flowchart on overview of traceability, mass balance and book keeping procedure.</p>
<p>E.4 Purchasing and goods in</p>	
<p>E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.</p>	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and noncertified FFB. Records verified by external audit. Sighted the Mass Balance worksheet-monthly input from April 17 to March 18.</p>
<p>E.4.2 The site shall inform the CB immediately if there is a projected overproduction.</p>	<p>The facilities aware of this procedure.</p>
<p>E.5 Record keeping</p>	
<p>E.5.1 a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis. (b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)</p>	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and noncertified FFB. Computerized system in place. Records verified by external audit. Sighted the Mass Balance worksheet-monthly input from April 17 to March 18. Computerized system in place with the delivery deducted accordingly. The Mill aware that only positive stock can be delivered. No short selling of product for the period April 17 to March 18.</p>
<p>E.5.2 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement</p>	<p>No outsourcing activities.</p>

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Supply Chain Declaration *(Applicable For Appendix D)*

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (MT)	Volume of FFB from uncertified supply bases (MT)	Total FFB/Month (mt)
1	April 2017	6,079.45	1,874.86	7,954.31
2	May 2017	7,714.14	2,257.17	9,971.31
3	June 2017	7,525.86	2,044.93	9,570.79
4	July 2017	8,320.96	2,108.56	10,429.52
5	August 2017	9,180.08	2,855.53	12,035.61
6	September 2017	10,322.69	2,431.10	12,753.79
7	October 2017	11,321.90	2,775.46	14,097.36
8	November 2017	11,711.90	2,441.66	14,153.56
9	December 2017	9,577.64	2,278.72	11,856.36
10	January 2018	8,229.96	1,716.64	9,946.60
11	February 2018	6,205.03	1,234.56	7,439.59
12	March 2018	5,878.76	1,535.79	7,414.55
TOTAL		98,577.42	25,554.98	127,623.35

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	April 2017	1,220.89	231.25
2	May 2017	1,564.71	267.28
3	June 2017	1,537.38	278.52
4	July 2017	1,717.44	327.44
5	August 2017	1,985.18	365.14
6	September 2017	2,074.95	406.50
7	October 2017	2,433.73	548.82
8	November 2017	2,537.45	558.86
9	December 2017	2,016.08	410.73
10	January 2018	1,623.69	348.75
11	February 2018	1,259.89	262.30
12	March 2018	1,185.56	249.96
TOTAL		21,156.95	4,255.55

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The data for CPO & PK sold starting from April 2017 until March 2018.

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)
1.	A	RSPO_PO10000057XX	1,590.59	
2.	B	RSPO_PO10000060XX		2,829.77
Total			1,590.59	2,829.77

The data for CPO & PK sold starting from April 2017 until March 2018.

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)
	C	ISCC	3,700.35	
	D	ISCC	6,599.95	
	E	ISCC	4,919.76	
Total			15,220.06	

The data for CPO & PK sold under other scheme starting from April 2017 until March 2018.

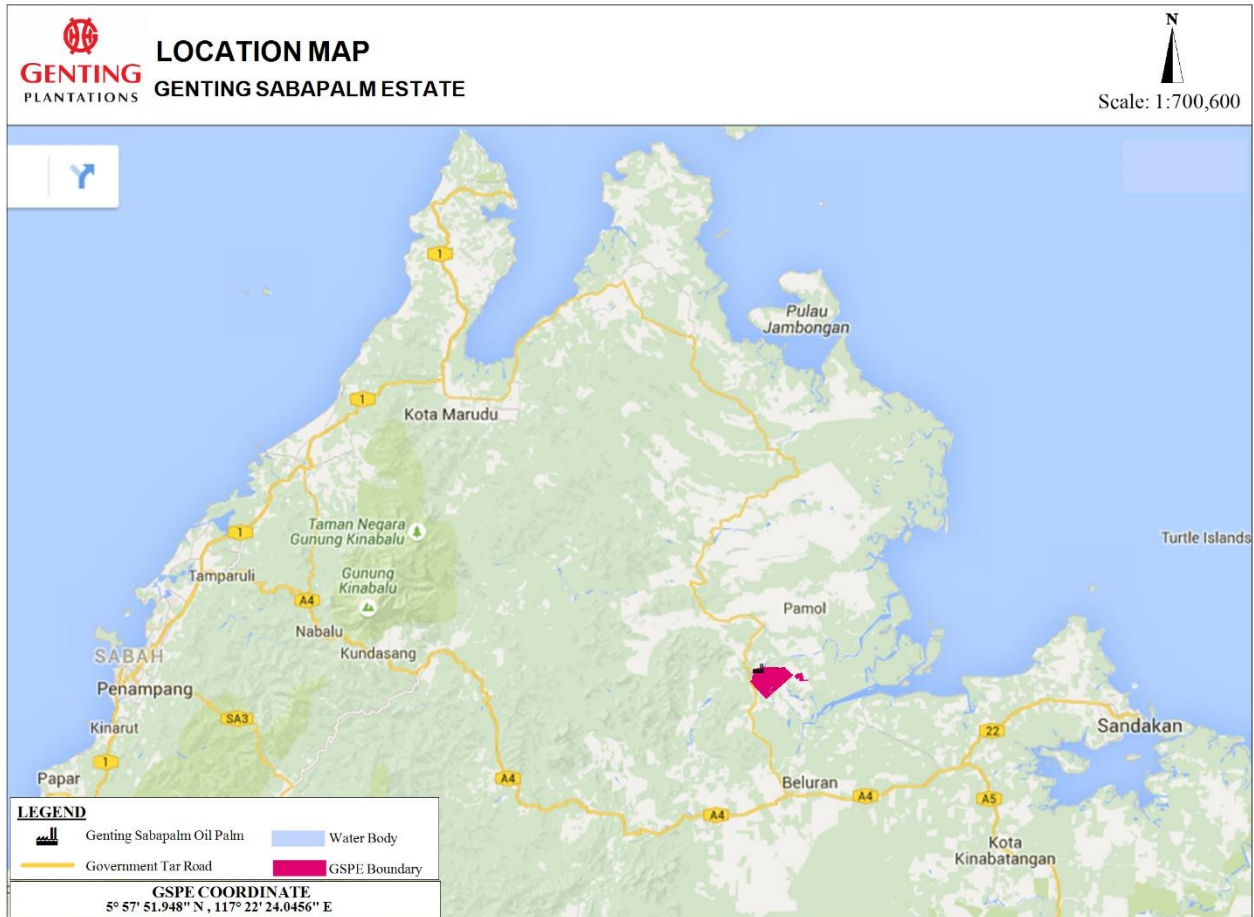
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E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	F	4,058.43	
2	G		1,283.82
Total		4,058.43	1,283.82

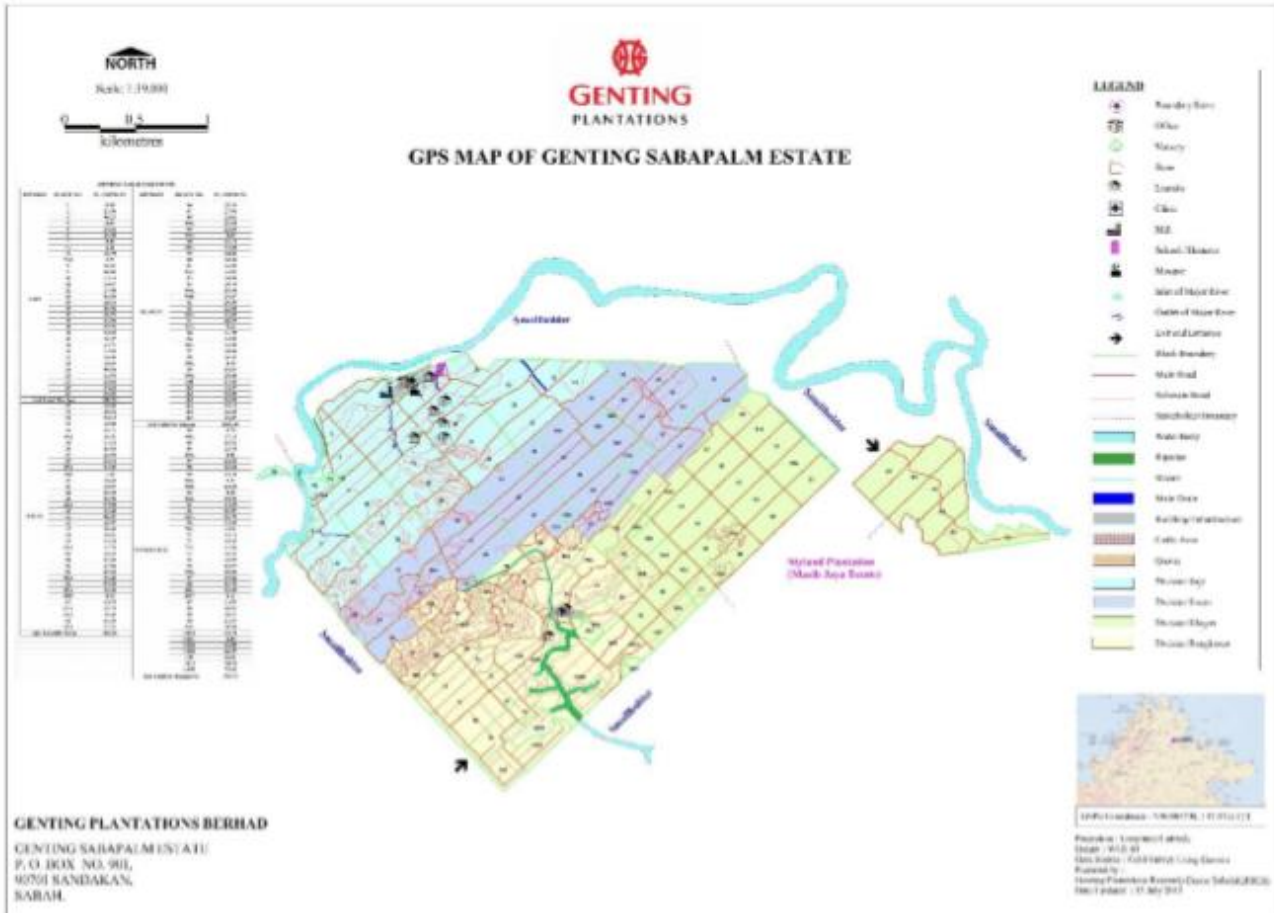
The data for CPO & PK as conventional to buyer starting from April 2017 until March 2018.

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	N/A	N/A	N/A

Appendix F: Location Map of Genting Sabapalm Oil Mill Certification Unit and Supply bases



Appendix G: Genting Sabapalm Estate Field Map



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

-Not applicable-

Appendix I: List of Abbreviations

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