

**RSPO PRINCIPLE AND CRITERIA –  
3<sup>rd</sup> Annual Surveillance Assessment (ASA3)  
Public Summary Report**

<b>Genting Plantations Berhad</b>
Client company Address: 10 <sup>th</sup> Floor, Wisma Genting Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
Certification Unit:  <b>Genting SDC Sdn Bhd Genting Tanjung Oil Mill</b>  Location of Certification Unit: Mile 97, Sandakan-Lahad Datu Road Tenegang, Jalan Jeroco 90200 Kinabatangan Sabah, Malaysia

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0086-06-000-00	<b>Membership Approval Date</b>	14/11/2006
<b>Parent Company Name</b>	Genting Plantations Berhad		
<b>Address</b>	10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia		
<b>Subsidiary (Certification Unit Name)</b>	Genting SDC Sdn Bhd Genting Tanjung Oil Mill		
<b>Address</b>	Mile 97, Sandakan-Lahad Datu Road, Tenegang, Jalan Jeroco 90200 Kinabatangan, Sabah, Malaysia		
<b>Contact Name</b>	Mr Tan Cheng Huat (Senior Vice President – Plantation Division)		
<b>Website</b>	<a href="http://www.gentingplantations.com">http://www.gentingplantations.com</a>	<b>E-mail</b>	<a href="mailto:Chenghuat.tan@genting.com">Chenghuat.tan@genting.com</a>
<b>Telephone</b>	+603 2333 6510 (Head office)	<b>Facsimile</b>	+603 2333 6575

2. Certification Information			
<b>Certificate Number</b>	RSPO 652320	<b>Date of First Certification</b>	11/01/2017
		<b>Certificate Start Date</b>	11/01/2017
		<b>Certificate Expiry Date</b>	10/01/2022
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production		
<b>Applicable Standards</b>	RSPO P&C MY-Ni 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E Mass Balance)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 680512	MS 1500:MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	08/08/2023
MSPO 692777	MS 1500:MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3		
MSPO 716640	MSPO Supply Chain Certification: 2018		06/10/2024
ISCC-PLUS-CERT-60183796	ISCC	ASG Cert	12/01/2020
SR 0595	MS 1722:2011		24/02/2020

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SR 0594	OHSAS 18001:2007	SIRIM QAS International Sdn Bhd	24/02/2020
EMS 00561	ISO 14001:2015		09/04/2020

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

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Tanjung Estate (GTJE)	3,973.66	234.96	257.65	4,466.27	88.97
Genting Tenegang Estate (GTGE)	3,434.89	29.75	187.90	3,652.54	94.04
Genting Landworthy Estate (GLWE)	3,706.61	9.87	322.52	4,039.00	91.77
Genting Layang Estate (GLYE)	1,817.80	179.92	79.69	2,077.41	87.50
Genting Bahagia Estate (GBGE)	4,029.42	44.54	353.08	4,427.04	91.02
Total	16,962.38	499.04	1,200.84	18,662.26	90.89

\*Changes of hectareage from previous year were due to resurvey of area and replanting program in all estates within Genting Tanjung and Genting Layang estate areas. Some boundaries between estates were re-demarcated to enhance the HCV area for Corridor of Life mainly within Genting Layang Estate area.

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<b>6. Plantings &amp; Cycle</b>							
<b>Estate</b>	<b>Age (Years)</b>					<b>Mature</b>	<b>Immature</b>
	<b>0 - 3</b>	<b>4 - 10</b>	<b>11 - 20</b>	<b>21 - 25</b>	<b>26 - 30</b>		
Genting Tanjung Estate (GTJE)	1,049.06	272.90	198.28	-	2,453.42	2,924.60	1,049.06
Genting Tenegang Estate (GTGE)	779.50	-	600.92	-	2,054.47	2,655.39	779.50
Genting Landworthy Estate (GLWE)	-	-	-	3,706.61	-	3,706.61	-
Genting Layang Estate (GLYE)	-	267.08	1,366.86	183.86	-	1,817.80	-
Genting Bahagia Estate (GBGE)	669.38	-	-	-	3,360.04	3,360.04	669.38
<b>Total</b>	<b>2,497.94</b>	<b>539.98</b>	<b>2,166.06</b>	<b>3,890.47</b>	<b>7,867.93</b>	<b>14,464.44</b>	<b>2,497.94</b>

<b>7. Certified Tonnage of FFB (Own Certified Scope)</b>			
<b>Estate</b>	<b>Tonnage / year</b>		
	<b>Estimated (Jan 2019-Dec 2019)</b>	<b>Actual (Nov 2018- Oct 2019)</b>	<b>Forecast (Jan 2020-Dec 2020)</b>
Genting Tanjung Estate (GTJE)	69,024.00	64,685.87	65,552.00
Genting Tenegang Estate (GTGE)	59,088.00	59,328.45	50,999.00
Genting Landworthy Estate (GLWE)	82,515.00	79,992.62	73,658.00
Genting Layang Estate (GLYE)	35,236.00	38,110.56	39,436.00
Genting Bahagia Estate (GBGE)	68,767.00	72,166.43	71,657.00
<b>Total</b>	<b>314,630.00</b>	<b>314,283.93</b>	<b>301,302.00</b>

<b>8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *</b>			
<b>Estate</b>	<b>Tonnage / year</b>		
	<b>Estimated (Jan 2018-Dec 2018)</b>	<b>Actual (Nov 2017- Oct 2018)</b>	<b>Forecast (Jan 2019-Dec 2019)</b>
<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>

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<b>Total</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
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<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b>			
<b>Independent FFB Supplier</b>	<b>Tonnage / year</b>		
	<b>Estimated (Jan 2018-Dec 2018)</b>	<b>Actual (Nov 2017- Oct 2018)</b>	<b>Forecast (Jan 2019-Dec 2019)</b>
<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>

<b>10. Certified Tonnage</b>			
<b>Mill Capacity: 60 MT/hr  SCC Model: MB</b>	<b>Estimated (Jan 2018-Dec 2018)</b>	<b>Actual (Nov 2017- Oct 2018)</b>	<b>Forecast (Jan 2019-Dec 2019)</b>
	<b>FFB</b>	<b>FFB</b>	<b>FFB</b>
	314,630.00	314,283.93	301,302.00
	<b>CPO (OER: 21.06 %)</b>	<b>CPO (OER: 20.63 %)</b>	<b>CPO (OER: 21.18 %)</b>
	66,261.08	64,836.77	63,815.76
	<b>PK (KER: 5.37 %)</b>	<b>PK (KER: 5.05 %)</b>	<b>PK (KER: 5.30 %)</b>
	16,895.63	15,871.34	15,969.01

<b>11. Actual Sold Volume (CPO)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSB</b>		
<b>CPO (MT)</b>	4,256.12	57,858.60	-	-	62,114.72

<b>12. Actual Sold Volume (PK)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSB</b>		
<b>PK (MT)</b>	14,999.63	-	-	-	14,999.63

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

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn Bhd,  
(ASI Accreditation Number: ASI-ACC-067)  
Suite 29.01, level 29  
The Gradens North Tower  
Mid Valley City, Lingkaran Syed Putra  
59200 Kuala Lumpur  
Tel +603 9212 9638 Fax +603 9212 9639  
Nicholas Cheong: [Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com)  
[www.bsigroup.com](http://www.bsigroup.com)

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

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site 3<sup>rd</sup> annual surveillance assessment was conducted from 11-14/11/2019. The audit programme is included as Appendix D. 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 methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criterias 2013 (MY-NI 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 minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (0.8\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula  $(0.8\sqrt{y}) \times (z)$ ; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between



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the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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

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

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Initial Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Genting Tanjung Oil Mill	√	√	√	√	√
Genting Tanjung Estate (GTJE)	√	-	√	-	√
Genting Tenegang Estate (GTGE)	√	-	-	√	-
Genting Landworthy Estate (GLWE)	-	-	√	-	√
Genting Layang Estate (GLYE)	-	√	-	√	-
Genting Bahagia Estate (GBGE)	-	√	-	-	√

**Tentative Date of Next Visit:** October 21, 2020 – October 24, 2020

**Total No. of Mandays:** 10 mandays including 1.0 manday for Supply Chain

**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Hafriazhar Mohd Mokhtar	Team Leader	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, Gabon, Nigeria and Pakistan. During assessment, he covered the legal issues, social issues, worker’s welfare and stakeholder consultation. He is fluent in Bahasa Malaysia and English languages
Ragu Erulappan Samy	Team Member	Ragu Erulappan is a fulltime employee with BSI Services Malaysia. He graduated from University Technology Malaysia. He attended internal RSPO training in 22 December 2014. He has completed ISO 9001:2008 Quality Management System Lead Auditor training, ISO 14001, ISO 18001 Lead Auditor Training. Currently he is an ISO 9001:2008, ISO 14001, ISO 18001, C-TPAT (Supply Chain Security) and GDPMD (Good Distribution Practice for Medical Devices) Lead Auditor. He has more than 5 years of auditing experience since August 2010 covering Environment, Safety and Health, Legal aspects in various industries. He is involved as Environment, Safety and Health Auditor during the RSPO Assessment. For this assessment he assesses Mill and Estate OSH, Legal, and Environment aspects. He is able to speak and understand Bahasa Malaysia, English and Tamil.
Amir Bahari	Team Member	He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health. He is fluent in both verbal/written in Bahasa Malaysia and English

**Accompanying Persons:**

<b>No.</b>	<b>Name</b>	<b>Role</b>
Nil	n/a	n/a

**2.3 Assessment Plan**

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

PRELIMINARY AGENDA					
Date	Time	Subjects	HMM	RE	AB
Sunday 10/11/2019	1025 - 1310	Travel to Sandakan via MH 2710	√	√	√
Monday 11/11/2019  <b>Genting Tenegang Estate</b>	0830 - 0900	Opening Meeting at Genting Tenegang Estate: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader</li> <li>• Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation)</li> <li>• Verification on previous audit findings</li> </ul>	√	√	√
	0900 - 1230	<b>Genting Tenegang Estate:</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill & etc.	√	√	√
	1230 - 1330	Lunch break	√	√	√
	1330 - 1630	<b>Genting Tenegang Estate:</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	1430 - 1600	<b>Genting Tenegang Estate:</b> Stakeholder consultation	√	-	-
	1630 - 1700	Interim briefing	√	√	√
Tuesday 12/11/2019  <b>Genting Layang Estate</b>	0830 – 1230	<b>Genting Layang Estate:</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill & etc.	√	√	√
	1000 – 1230	<b>Genting Layang Estate:</b> Stakeholder consultation	√	√	√
	1230 - 1330	Lunch break	√	√	√

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PRELIMINARY AGENDA					
Date	Time	Subjects	HMM	RE	AB
	1330 - 1630	<b>Genting Layang Estate:</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	1630 - 1700	Interim briefing	√	√	√
Wednesday 13/11/2019  <b>Genting Tanjung Oil Mill</b>	0900 – 1230	<b>Genting Tanjung Palm Oil Mill:</b> Inspection of 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.	√	√	√
	1230 – 1330	Lunch break	√	√	√
	1330 - 1630	<b>Genting Tanjung Palm Oil Mill:</b> Lab, 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	√	√	√
	1630 - 1700	Interim briefing	√	√	√
Thursday 14/11/2019  <b>Genting Tanjung Oil Mill</b>	0830 – 1630	<b>Supply chain audit for Genting Tanjung Palm Oil Mill</b> <ul style="list-style-type: none"> <li>• General COC for supply chain</li> <li>• RSPO rules communication and claim Module E: Mass Balance</li> </ul>	√	-	-
	1630 - 1700	Closing meeting	√	-	-
Friday 15/11/2019	1355-1635	Travel back to KL via MH 2711	√	√	√

### Section 3: Assessment Findings

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

- Genting Plantations Berhad Multiple Management Units / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

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

Time Bound Plan		
Requirement	Remarks	Compliance
<b>Summary of the Time Bound Plan</b>		
Does the plan include all subsidiaries, estates and mills?	All subsidiaries, estates, mills and refinery (existing operations and yet to be constructed) except those estates (landholdings) planned to be developed into property development ( West Malaysia).	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	The first oil mill and its supply bases were certified in 2015.	Yes
Is the time bound plan challenging? <ul style="list-style-type: none"> <li>• Age of plantations.</li> <li>• Location.</li> <li>• POM development</li> <li>• Infrastructure.</li> <li>• Compliance with applicable law.</li> </ul>	Based on age of plantations, location, existing POM facilities and infrastructure as well as status of compliance with applicable law, the time bound found to be challenging.	Yes
Have there been any changes since the last audit? Are they justified?	On 12 October 2017, the RSPO Secretariat released a statement on Hak Guna Usaha (HGU) to Indonesian stakeholders ( <a href="https://rspo.org/news-and-events/announcements/revised-rspo-updated-statement-on-hak-guna-usaha-july-2018">https://rspo.org/news-and-events/announcements/revised-rspo-updated-statement-on-hak-guna-usaha-july-2018</a> ), The statement set out the requirements on legality of land, whereby an RSPO grower member’s rights to land must be in the form of a legitimate HGU and Izin Usaha Perkebunan (IUP), prior to obtaining RSPO certification.  Pursuant to this, which was effective as of 12 October 2017, RSPO members must have a legitimate right to cultivate (Hak Guna Usaha or a	Yes

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	<p>HGU) and IUP in order to secure the RSPO certificates.</p> <p>As of Jan 2020, only 2 PTs 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.</p>	
If there have been changes, what circumstances have occurred?	No any circumstances occur that lead to any changes.	N/A
Have there been any stakeholder comments?	No comments received.	Yes
Have there been any newly acquired subsidiaries?	No new acquisition as of 15 January 2020.	Yes
If yes, have the newly acquisitions certified within a three-year timeframe?	Not applicable	N/A
Have there been any isolated lapses in implementation of the plan?	No lapses however re-scheduling of the certification dates has been made.	Yes
<b>Un-Certified Units or Holdings</b>		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	<p><u>Sabah</u></p> <p>1. Genting Kencana Estate – LUCA passed, Concept Note for Remediation and Compensation submitted to Panel. Concept Note under revision and to be re-submitted to the Panel in 1Q 2019.</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 under review by RSPO.</p>	Yes
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	NPP for PT PALJ, PT AAC, PT UAI, PT SMA, PT KIU are in progress.	Yes
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.	<p>Based on the following:</p> <p><a href="http://www.rspo.org/members/complaints/status-of-complaints/view/38">http://www.rspo.org/members/complaints/status-of-complaints/view/38</a></p> <p>Complaints officially closed on 31 October 2016.</p>	Yes

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Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion6.3.	No any labor disputes occur.	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Based on the following: <a href="https://askrspo.force.com/Complaint/s/casetracker">https://askrspo.force.com/Complaint/s/casetracker</a> No any legal non-compliance occur.	Yes
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Internal audit was conducted for uncertified units on periodical basis by Sustainability Team. Internal audit report indicated the positive assurance has been produced.	Yes

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

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill’s initial certification?  OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable	N/A

### 3.4 Details of findings

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

During the 3<sup>rd</sup> Annual Surveillance Assessment there were 2 (two) Major Nonconformities & 1 (one) Minor Nonconformity raised. The Genting Tanjung Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1847887-201911-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.7.2 Major
<b>Date Issued</b>	14/11/2019	<b>Due Date</b>	10/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	14/01/2020
<b>Statement of Nonconformity:</b>	The hazard identification, risk rating and risk control review measures details in certain HIRARC operations was not adequately addressed.		
<b>Requirement Reference:</b>	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.		
<b>Objective Evidence:</b>	<p>Genting Tenegang Estate:            There was an (MC&gt;4 days) JKPP 6 incident dated 21/7/19 on the (Harvesting - cutting of palm fronds. However, the HIRARC for the related activity was not reviewed.</p> <p>Genting Layang Estate:            a) 1 accident case reported with MC 2 days on 10/9/19. The accident investigation been conducted and HIRARC for the related accident activity - Bodily injury due to Grass Cutting Knife been reviewed on 1/11/19. However, the HIRARC review was not fully addressed as the review on Likelihood rating as not adequately reviewed as per the risk rating matrix. Note: Currently rated: (Likelihood x severity) – (1x2) – 1 is very unlikely.            b) HIRARC for Landfill operation was not available.            c) Modification works been carried out for the Diesel skid tank operation on the working at height. However, the HIRARC for Diesel operation did not capture on the working at height activity.</p>		
<b>Corrections:</b>	<p>GTGE:            The estate management with guidance from the SHO will conduct the HIRARC review for the related activity</p> <p>GLYE:            a) The estate management will amend the reviewed HIRARC and change the risk rating from 1x2 to 2x2</p>		



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	<p>b) The estate management with guidance from the SHO will produce the HIRARC for estate landfill.</p> <p>The estate management with guidance from the SHO will conduct the risk assessment for working at height activity in the diesel skid tank and update the HIRARC for Diesel Operation in the estate.</p>
<b>Root Cause Analysis:</b>	Some operations HIRARC not adequately addressed due to inconsistent availability of reporting by operating units (OU) of any accident; incident; new activities /operations to the safety officer.
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>SHO will review the OSH Manual on HIRARC, OM-GPB-07, on how and when to review or update the HIRARC and a flow chart that simplified this procedure will be produce by SHO to improve the effectiveness of this procedure.</li> <li>SHO will conduct training of requirement in OSH Manual, OM-GPB-01 to the estate management so that accident/incident/new activities/operations and First Aid cases by operating units will be reported soonest to SHO.</li> <li>SHO will issue official email or memo to ensure consistent reporting by OU on any accident; incident; new activities/operations and First Aid cases so that SHO can coordinate to do HIRARC review with the OU.</li> <li>Training and briefing on Accident Reporting and HIRARC by SHO will be implemented yearly and included in GTGE and GLYE OSH Training Plan 2020 as a monitoring plan will be further checked during the next RSPO Internal Audit in the estate.</li> </ol>
<b>Assessment Conclusion:</b>	<p>Off-site verification of CAP was done for the following evidence:</p> <ol style="list-style-type: none"> <li>Reviewed HIRARC based on Occupational Accident report GTGE</li> <li>The amended HIRARC for GLYE</li> <li>HIRARC for landfill GLYE</li> <li>Updated HIRARC for estate’s diesel operation GLYE</li> <li>Reviewed OM-GPB-07 and the Produced Flow chart procedure by SHO</li> <li>Briefing record on OSH Manual, OM-GPB-01, to GLYE and GTGE</li> <li>Official Email or Memo from SHO to OU regarding accident reporting.</li> <li>GTGE OSH Training Plan for 2020</li> <li>GLYE OSH Training Plan for 2020</li> </ol> <p>Verified evidence of corrections and corrective actions taken confirmed to be effective to address the issue. Hence, Major Nonconformity was closed on 14/1/2020.</p>

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1847887-201911-M2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.8.2 Major
<b>Date Issued</b>	14/11/2019	<b>Due Date</b>	10/02/2020

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<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	14/01/2020
<b>Statement of Nonconformity:</b>	Evidence provided that employees among migrant women workers have been discriminated against.		
<b>Requirement Reference:</b>	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against.		
<b>Objective Evidence:</b>	The Agreement template Sabah OUs; Revised on 1/1/2018; for Para 16.1 Cuti Bersalin specifying "Pekerja wanita tempatan layak menerima cuti bersalin dengan elaun bersalin selama tidak kurang 60 hari (termasuk hari-hari rehat atau cuti umum yang jatuh dalam tempoh itu) setelah memenuhi syarat dan kelayakan mengikut Ordinan Buruh Sabah 2005" shown that there's discrimination against migrant women workers for the entitlement of maternity leave.		
<b>Corrections:</b>	<p>The company's HR will amend the clause 16.1 on the current revised Workers Agreement to '<i>PEKERJA wanita layak menerima cuti bersalin dengan elaun bersalin selama tidak kurang 60 hari.....</i>' to indicate that there are no such discriminations on foreign female workers.</p> <p>Immediate action will be taken and complied immediately. A new revised Workers Agreement with the amended paragraph 16.1 will be produce.</p> <p>An addendum agreement for this clause will be issued to all current foreign workers in the estate.</p>		
<b>Root Cause Analysis:</b>	<p>This current revised Workers Agreement for Paragraph 16.1 is based on Malaysia Immigration Department conditions regarding the work permit (PLKS) for foreign workers including women.</p> <p>Refer to <a href="https://www.imi.gov.my/index.php/ms/pekerja-asing.html">https://www.imi.gov.my/index.php/ms/pekerja-asing.html</a></p> <p>Pekerja asing yang memegang PL(KS) adalah tertakluk kepada syarat-syarat seperti berikut: -</p> <ul style="list-style-type: none"> <li>• Pekerja tidak dibenarkan berkahwin dengan warganegara Malaysia atau warganegara asing sepanjang memegang PL(KS);</li> </ul>		
<b>Corrective Actions:</b>	New revised workers agreement will be use for all new recruited workers for the company in Sabah. This matter will be further monitor during the next RSPO Internal Audit.		
<b>Assessment Conclusion:</b>	<p>Off-site verification of CAP was done for the following evidence:</p> <ol style="list-style-type: none"> <li>1. New revised Workers Agreement.</li> <li>2. The Addendum agreement issued to estate workers.</li> </ol> <p>Verified evidence of corrections and corrective actions taken confirmed to be effective to address the issue. Hence, Major Nonconformity was closed on 14/1/2020.</p>		

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1847887-201911-N1	<b>Clause &amp; Category</b>	Indicator 4.7.5

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		<b>(Major / Minor)</b>	Minor
<b>Date Issued</b>	14/11/2019	<b>Due Date</b>	Next annual surveillance
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	First aid case investigation process was not adequately addressed according to internal procedure requirements.		
<b>Requirement Reference:</b>	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.		
<b>Objective Evidence:</b>	<p>Genting Tenegang Estate: There were (MC&lt;4) 4 first aid cases (minor cut due to sharpening the sickle) in June 2019. However, no Accident Investigation Report was conducted as per internal procedure "Carta 1- Pemberitahuan mengenai Kemalangan dan Penyiasatan di Tempat Kerja" requirement.</p> <p>Genting Layang Estate: Chemical Storekeeper first aid kit: - Monthly first aid kit inspection record e.g. sampled for July-19 was available with details of refilled of first aid items for used up first aid items. However, the first aid case usage record was not recorded for the used up first aid items.</p> <p>Genting Tanjung POM: Admin Office First Aid Kit - First Aid cases dated 4/7/19, 17/7/19, 14/8/19, 21/8/19, 24/8/19 and 28/10/19 were recorded in the sampled First Aid Log Book at Admin Office. However, the review of first aid injury cases was not investigated and reviewed accordingly in the OSH Meeting dated 20/9/19 as per internal procedure NADOPOD (SP-MGR-06) requirement.</p>		
<b>Corrections:</b>	<p>GTGE: Accident Investigation Report will be done for all the first aid case through Borang A, as per company OSH Manual procedure.</p> <p>GLYE: The first aid case usage record for the storekeeper First Aid Kit will be updated and the First Aid injury cases for 2019 all will be investigated and review in the next OSH Meeting scheduled in December 2019.</p> <p>GTOM: The First Aid injury cases for 2019 all will be investigated and review in the next OSH Meeting scheduled in December 2019.</p>		
<b>Root Cause Analysis:</b>	First aid case investigation process was not adequately addressed due to inconsistent reporting of all accident/incident case including FA case to SHO and no cross-checking of first aid kit inspection records.		
<b>Corrective Actions:</b>	GTGE: Briefing and Training on OSH Manual will be an annual program conducted by the SHO for all estate HA. This will be included in GTGE OSH Training Plan for 2020. This will be further checked during next RSPO Internal Audit.		

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	<p>GLYE:  A monthly First Aid Kit Inspection schedule will be produced by HA as a monitoring plan. The estate HA will monitor all the First Aid kit through the Monthly first aid kit inspection. The inspection record will be including worker’s name and item issued for each month as well as refill record for each of the first aid kit. All report will be review and sign by Assistant Manager in charge and will be approve by the Estate Manager. This will be further checked during next RSPO Internal Audit.</p> <p>GTOM:  All accident report including First Aid cases will be investigate and review in all OSH Meeting and will be a permanent in the list of agenda for all OSH Meeting in near future. This will be further checked during next RSPO Internal Audit.</p> <p>SHO will issue official email or memo to ensure consistent reporting by OU on any accident; incident; new activities/operations and First Aid cases</p>
<b>Assessment Conclusion:</b>	Corrective actions plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence CAP will be verified during next assessment.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1847887-201911-N2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.3.3 Minor
<b>Date Issued</b>	14/11/2019	<b>Due Date</b>	Next annual surveillance
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	“Open”
<b>Statement of Nonconformity:</b>	The waste management and disposal plan to avoid or reduce pollution was not adequately documented and implemented.		
<b>Requirement Reference:</b>	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.		
<b>Objective Evidence:</b>	Genting Layang Estate: The was management and disposal plan was not adequately documented and implemented for type of waste generated from demolished buildings (Old Labour Quarters - LQ1) debris which was found within housing compound area of GLYE in front of LQ2.		
<b>Corrections:</b>	Management and handling of Building construction and solid waste management will be based on the estate EIA and waste management plan. The GLYE waste management plan will be revised to include in the management and handling of construction waste. Sustainability Department will assist and review the revised Waste management Plan.		
<b>Root Cause Analysis:</b>	Waste management and disposal plan to avoid or reduce pollution was not adequately documented and implemented for demolished buildings debris since the demolishing work was done by contractor with no briefing on how to manage the waste.		
<b>Corrective Actions:</b>	Training on EIA and its implementation and training for waste management plan will be conducted to the estate management. This training will be included in the estate Annual Training Plan for 2020 as monitoring plan and will be further checked during the next RSPO internal audit.		

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	Training and briefing of waste management and disposal plan for contractor will be done in case of any contractor engaged for any demolition work in the estate.
<b>Assessment Conclusion:</b>	Corrective actions plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence CAP will be verified during next assessment.

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
OFI 1	-Nil-

<b>Positive Findings</b>	
<b>PF #</b>	<b>Description</b>
PF 1	Layang Estate has developed a corridor of life along Sg Tenegang with wide planting of forest trees initiated in 2009. This effort in calibrations with WWF.
PF 2	Layang Estate had a monthly best performance employees recognition beginning from staff to workers and exhibited in public estate vicinity.
PF 3	Genting Tanjung Mill had the following projects in the forthcoming 5 years in the CAPEX. <ul style="list-style-type: none"> <li>a) Construction of the ESP plant to improve the dust particulate emission anticipated to commission in 2020. Cost of approximately RM.2.2m</li> <li>b) 3MCPD chemical removal from the CPO through new machinery installed in the oil process line anticipated in 2<sup>nd</sup> half of 2020.</li> <li>c) Bio-Gas Plant installation currently on feasibility study by GPB Head Office</li> </ul>

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

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1707465-201808-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.2.1 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	15/02/2018
<b>Statement of Nonconformity:</b>	Consultation and communication procedure was not implemented effectively.		
<b>Requirement Reference:</b>	Consultation and communication procedures shall be documented.		
<b>Objective Evidence:</b>	Interviewed with the female workers who worked on night shift in GTOM and seen the meeting minutes for Gender Committee dated 14/8/2018 found that the workers were asking about the night shift allowance and the Chairman of the committee informed that allowance has agreed as per the memo dated 24/11/2017 issued by top management. Interviewed with the management confirmed that they had only paid 3 months of allowance to the female workers on December 2017, January 2018 and February 2018 and stopped paying the allowance on March 2018 due to they obtained approval from JTK Sabah for exclusion to comply with the terms stated in the permit obtain earlier. However, the workers are not aware that		

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	night shift allowance has been stopped for female workers and no evidence to show that management has communicated the issue to the workers.
<b>Corrective Actions:</b>	<p>i) All communication involving workers and other stakeholders to be conducted as per procedure, documented, filed and to include notice of meeting, minutes, photo etc.</p> <p>ii) Refresher training to the management and section head regarding the requirement of Consultation and Communication Procedure SMP-GPB-17.</p>
<b>Assessment Conclusion:</b>	<p>ASA3 verification:          The process implemented based on Sustainability Management Procedure for Consultation and Communication; SMP-GPB-17; Rev. 02; Date: 23/2/2018. Consultation &amp; communication done through meetings, dialogs, and engagement to both internal &amp; external stakeholders. Any complaints or grievances recorded in Genting Plantations Complaints/Grievance Record Book. There's no recurrence of issue hence, the Major NC remained closed.</p>

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1707465-201808-M2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.7.1 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	15/02/2019
<b>Statement of Nonconformity:</b>	The implementation of social and people policy was not effective.		
<b>Requirement Reference:</b>	There shall be documentary evidence that minimum age requirements are met.		
<b>Objective Evidence:</b>	Site visit to crèche and interviewed with a teenager aged 14 years old told that she is working in the field with her mother to collect loose fruit together with another friend who aged 12 years old. She was not feeling well during the visit and rested at crèche. Field visit to the Block 21 and interviewed with the mandore and mother of the teenager confirmed that there were two teenagers working in the field with them to collect loose fruits. During field visit also found that the teenager with age of 12 years old was working in the field.		
<b>Corrective Actions:</b>	<p>To issue Internal Memo on the following:</p> <ul style="list-style-type: none"> <li>- Continuous monitoring by the Field Supervisor and Assistant In-Charge.</li> <li>- In the event any children found in the field, the matter shall be reported immediately to the Estate manager.</li> <li>- Periodic check estates' register against attendance at Humana, CLC &amp; Creche.</li> <li>- Teachers also to alert management on frequent absent children.</li> <li>- Encourage parents to send their children to school.</li> <li>- Parents to be held responsible.</li> <li>- To include the policies training or awareness programme into the estate annual training plan</li> <li>- To erect awareness signboard at prominent location to create and enhance workers knowledge regarding the company policy</li> </ul>		
<b>Assessment Conclusion:</b>	<p>ASA3 verification:          Genting Plantation Berhad has established and implemented minimum age policy and no children below ages of 18 working in the estate and this was proven</p>		

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	<p>through checking the list of employees as well as their biodata and through estate visits</p> <p>Inspection of a sample of personnel files at the estates office confirmed recruits' ages were checked against their Identity Card for Malaysian workers or their passport in the case of foreign workers. Under-age persons were not observed at any of the work locations visited.</p> <p>There's no recurrence of issue hence, the Major NC remained closed.</p>
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<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1707465-201808-N1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.7.3 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	12/11/2019
<b>Statement of Nonconformity:</b>	PPE compliance and its monitoring effectiveness was not fully adequate.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	During the Genting Landworthy Estate site visit on spraying activities at block 40, noticed that the PPE maintenance for the workers was not adequate. Found one respirator without filter and the other 2 units with worn out filters.		
<b>Corrective Actions:</b>	Estate will monitor and inspect during muster call. All monitoring will be recorded.		
<b>Assessment Conclusion:</b>	<p>ASA3 verification: Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE.</p> <p>Suitable PPE has been provided to the workers based on the information in the SDS and CHRA assessor's recommendation. List of Personal Protective Equipment (PPE) Provided – identifies the type of PPE for the respective activities.</p> <p>a. Melewar POM: Boiler/Engine operator – Safety Helmet, Semi leather Hand Glove, Cotton Gloves, Safety Shoes, Safety Vest and Ear Muff. Sampled PPE issuance record dated 22/08/19 for Safety Helmet – Boilerman, 1/11/19 – Press Operator, 11/11/19 – Engine Room Operator, and 26/5/19 – Engine Room Operator.</p> <p>b. Genting Tenegang Estate: Field workers (sprayer, manure &amp; harvester) – N95 respirator, anti-mist goggles, wellington boots, apron and sickle cover. Sampled PPE issuance record dated 6/11/19 – Safety Boot (Sprayer), 2/2/19 - Safety Goggle (Sprayer) and 13/8/19 – Face Mask (Sprayer).</p> <p>c. Genting Layang Estate: Field workers (sprayer, manure &amp; harvester) – N95 respirator, anti-mist goggles, wellington boots, apron and sickle cover. Sampled PPE issuance record – Apron (Manurer) dated 22/1/19, Latex Rubber Glove</p>		

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	<p>(Manurer) dated 26/2/19, Face Mask (Manurer) dated 17/5/19, Goggle (Manurer) dated 26/2/19 and Respirator Filter (Sprayer) dated 11/11/19.          Verified that the mill &amp; estates chemical store was found to be adequately organized, properly labelled, secured and person in charge understands the OSH procedures. Safety Date Sheet was placed at the chemical stores and is available. The person in charge understands the information written in Safety Data Sheet.</p> <p>Verified that proposed correction &amp; corrective action plan has implemented accordingly. Verified also that there was no repetitive of similar issue during this assessment visit. Therefore, the Minor NC raised during the previous assessment has been verified and closed effectively on 12/11/2019.</p>
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<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1707465-201808-N2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.1.2 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	12/11/2019
<b>Statement of Nonconformity:</b>	The medicine inventory control and its ordering process mechanism found to be not fully effective.		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures shall be in place.		
<b>Objective Evidence:</b>	Visit to the Genting Landworthy Estate in house clinic found that the fever medicine syrups for children has no stock and currently adult paracetamol tablets are used as temporary replacement. Further verification indicate that the Internal Pre-Order Form dated 27/10/18 was yet to be processed for approval of medicine purchase		
<b>Corrective Actions:</b>	SOP/workflow chart to ensure HA monitor and follow up on medicine stock checking and pre-order form. Any delay to be reported to the Estate Manager. Medicine order to be done in advance to avoid shortage.		
<b>Assessment Conclusion:</b>	<p>ASA3 verification:            The mechanisms to check the implementation of procedures were made among others through;</p> <ul style="list-style-type: none"> <li>- Internal audit, safety and health meeting</li> <li>- Daily supervision and inspection by estates executives and mill engineers.</li> <li>- Routine inspection (workplace inspection) by Assist Manager, staff and hospital assistant.</li> </ul> <p>Inspection and advisory visits by Sustainability and Safety department from HQ/Regional Office.</p> <p>Verified that proposed correction &amp; corrective action plan has implemented accordingly. Verified also that there was no repetitive of similar issue during this assessment visit. Therefore, the Minor NC raised during the previous assessment has been verified and closed effectively on 12/11/2019.</p>		

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1707465-201808-N3	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.1.3 Minor



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<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	12/11/2019
<b>Statement of Nonconformity:</b>	Mechanism of ensuring compliance of legal requirement (Immigration Act 1959/63 – Act 155, Section 15 (1) and Labor Ordinance Sabah (Cap 67) Section 108 were ineffective.		
<b>Requirement Reference:</b>	A mechanism for ensuring compliance shall be implemented.		
<b>Objective Evidence:</b>	<p>In Genting Tanjung Oil Mill, Genting Tanjung Estate and Genting Landworthy Estate has found that workers’ permits had expired and under process of renewal. Sampled of the work permits that expired as below:</p> <ul style="list-style-type: none"> <li>a. Permit No.: PD 9134067 valid until 20/8/2018 (GTJE)</li> <li>b. Permit No.: PD 9136744 valid until 8/11/2018 (GTJE)</li> <li>c. Permit No.: PD 9136739 valid until 8/11/2018 (GTJE)</li> <li>d. Permit No.: PD 9136740 valid until 8/11/2018 (GTJE)</li> <li>e. Permit No.: PD 8903693 valid until 25/7/2018 (GTJE)</li> <li>f. Permit No.: PD 9117270 valid until 20/8/2018 (GTJE)</li> <li>g. Permit No.: PD 9139441 valid until 30/10/2018 (GTOM)</li> <li>h. Permit No.: PD 9134231 valid until 28/9/2018 (GTOM)</li> <li>i. Permit No.: PD 8914820 valid until 20/8/2018 (GLWE)</li> <li>j. Permit No.: PD 7851415 valid until 6/5/2018 (GLWE)</li> <li>k. Permit No.: PD 9574534 valid until 30/10/2018 (GLWE)</li> <li>l. Permit No.: PD 7629758 valid until 6/3/2018 (GLWE)</li> <li>m. Permit No.: PD 9136429 valid until 30/8/2018 (GLWE)</li> <li>n. Permit No.: PD 7851445 valid until 5/6/2018 (GLWE)</li> </ul> <p>Besides, document reviewed found that there were dependents who were born in Indonesia who possessed passport and Visit Pass (Social). However, sampled of the Visit Pass found that the following passes below were expired:</p> <ul style="list-style-type: none"> <li>a. Permit No.: PD 6135428 valid until 20/8/2017 (GLWE)</li> <li>b. Permit No.: PD 8291832 valid until 5/6/2018 (GLWE)</li> <li>c. Permit No.: PD 8902545 valid until 18/8/2018 (GLWE)</li> <li>d. Permit No.: PD 7848969 valid until 4/6/2018 (GLWE)</li> <li>e. Permit No.: PD 6135494 valid until 18/6/2017 (GLWE)</li> <li>f. Permit No.: PD 8902008 valid until 6/7/2018 (GTJE)</li> <li>g. Permit No.: PD 8902011 valid until 6/7/2018 (GTJE)</li> <li>h. Permit No.: PD 7330339 valid until 3/2/2018 (GTJE)</li> <li>i. Permit No.: PD 8902006 valid until 18/6/2018 (GTJE)</li> <li>j. Permit No.: PD 9136467 valid until 19/7/2018 (GTJE)</li> <li>k. Permit No.: PD 8291657 valid until 28/6/2018 (GTJE)</li> </ul> <p>In additional, verified the name list of dependents (without passport and visit pass) found that total 115 children from Indonesia. Total 24 children were born in Indonesia and 91 children were born in Malaysia were without valid passport and valid pass to stay in Malaysia.</p> <p>Genting Tanjung Estate Based on permit issued by Labour Department, ref: JTK.H.KBN.600-4/1/01261/0378 validity period 28/3/18 -27/3/19, 391 Indonesian and 5 Philippines workers approved for the permit. The latest workers master list as at October 2018 reported with additional of 50 new workers (total of 441). No evidence of additional quota approval obtained for the said workers as to date.</p>		
<b>Corrective Actions:</b>	A. Work Permit & Visit Pass:		

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	<ul style="list-style-type: none"> <li>- Follow up closely with HRAD and relevant agencies.</li> <li>- To ensure the relevant correspondence are kept properly for future reference.</li> </ul> <p>B. Dependants/Children without valid passport &amp; valid pass</p> <ul style="list-style-type: none"> <li>- To ensure follow up done with HRAD and authorities for every application sent and the relevant correspondence are kept properly for future reference.</li> </ul> <p>C. Manpower requirement:</p> <p>To ensure manpower requirement reviewed annually and submitted to JTK for approval.</p>
<p><b>Assessment Conclusion:</b></p>	<p>ASA3 verification:</p> <p>Currently, the person/team responsible for monitoring the changes and communicating in Estate is the Assistant Manager and in POM is the Mill Engineer. The mechanisms for ensuring compliance including checking of the implementation of procedures that were made among others through;</p> <ul style="list-style-type: none"> <li>- Internal audit, safety and health meeting</li> <li>- Daily supervision and inspection by estates executives and mill engineers.</li> <li>- Routine inspection (workplace inspection) by Assist Manager, staff and hospital assistant.</li> </ul> <p>Additionally, inspection and advisory visits were also conducted by Sustainability and Safety department from HQ/Regional Office.</p> <p>Verified that proposed correction &amp; corrective action plan has implemented accordingly. Verified also that there was no repetitive of similar issue during this assessment visit. Therefore, the Minor NC raised during the previous assessment has been verified and closed effectively on 12/11/2019.</p>

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<p><b>NCR Ref #</b></p>	<p>1707465-201808-N4</p>	<p><b>Clause &amp; Category (Major / Minor)</b></p>	<p>Indicator 6.8.3 Minor</p>
<p><b>Closed (Yes / No)</b></p>	<p>Yes</p>	<p><b>Date of nonconformity Closure</b></p>	<p>12/11/2019</p>
<p><b>Statement of Nonconformity:</b></p>	<p>There was no recruitment procedure to demonstrate the hiring process.</p>		
<p><b>Requirement Reference:</b></p>	<p>It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.</p>		
<p><b>Objective Evidence:</b></p>	<p>Sampled the mandore's checkroll book and interviewed with the mandore confirmed that 4 of the loose fruits collectors who do not possess passport and permit are working in the field and payment of wages was under the mandore's account (Employee No.: E00212). This occurred because the workers did not register in the company's system as they do not have legal documents.</p>		
<p><b>Corrective Actions:</b></p>	<p>All recruitment process for new workers in the estate to be based on the Recruitment Procedure published by the HRAD. Training to management team on the new procedure.</p>		
<p><b>Assessment Conclusion:</b></p>	<p>ASA3 verification:</p> <p>Genting Plantation Berhad has established a Social Policy, signed by President &amp; Chief Operating Officer dated on 22.06.2015 in order to ensure equal opportunity</p>		

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	<p>and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. Inspection of a sample of pay records and interviews of staff and workers in all estates did not identify any issues related to discrimination.</p> <p>Based on interview with employees from different backgrounds, there is no evidence that the management engage in or support any discriminatory practices. The commitment to no discrimination is also stated in the company’s social policy.</p> <p>Verified that proposed correction &amp; corrective action plan has implemented accordingly. Verified also that there was no repetitive of similar issue during this assessment visit. Therefore, the Minor NC raised during the previous assessment has been verified and closed effectively on 12/11/2019.</p>
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<b>Opportunity for Improvement</b>	
<b>OFI#</b>	<b>Description</b>
<b>OFI 1</b>	-Nil-

**3.4.2 Summary of the Nonconformities and Status**

<b>CAR Ref.</b>	<b>Category (Major / Minor)</b>	<b>P&amp;C Indicator</b>	<b>Issued Date</b>	<b>Status &amp; Date (Closure)</b>
1369435M1	Major	2.1.1	23/08/2016	Closed out on 01/09/2016
1369435M1	Major	4.7.2	23/08/2016	Closed out on 01/09/2016
1559908-201709-M1	Major	6.5.1	24/11/2017	Closed out on 19/1/2018
1559908-201709-M2	Major	6.5.2	24/11/2017	Closed out on 19/1/2018
1559908-201709-N1	Minor	5.3.3	24/11/2017	Closed out on 16/11/2018
1707465-201808-M1	Major	6.2.1	16/11/2018	Closed out on 15/02/2019
1707465-201808-M2	Major	6.7.1	16/11/2018	Closed out on 15/02/2019
1707465-201808-N1	Minor	4.7.3	16/11/2018	Closed out on 12/11/2019
1707465-201808-N2	Minor	4.1.2	16/11/2018	Closed out on 12/11/2019
1707465-201808-N3	Minor	2.1.3	16/11/2018	Closed out on 12/11/2019
1707465-201808-N4	Minor	6.8.3	16/11/2018	Closed out on 12/11/2019
1847887-201911-M1	Major	4.7.2	14/11/2019	Closed out on 14/01/2020
1847887-201911-M2	Major	6.8.2	14/11/2019	Closed out on 14/01/2020
1847887-201911-N1	Minor	4.7.5	14/11/2019	“Open”
1847887-201911-N2	Minor	5.3.3	14/11/2019	“Open”

**3.5. Stakeholders Consultation**

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

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

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


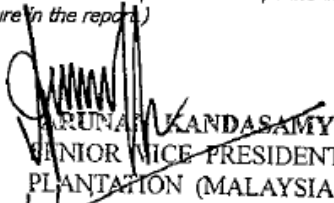
<b>List of Stakeholders Contacted</b>	
<b>Internal Stakeholders</b> Mill supervisors Field supervisors Mandores Operation workers General workers Storekeepers Harvesters Sprayers Crèche minder Genting Auxiliary Police	<b>Union/Contractors/Local Communities</b> Neighbouring estates Sundry shop operators FFB suppliers Mill suppliers Estate contractors Workers representatives
<b>Government Departments</b> -	<b>NGO</b> CLC teacher

<b>IS #</b>	<b>Description</b>
<b>1</b>	<b>Feedbacks:</b> Neighbour Estates: Concerned over issue on “existence” of inter-estate boundary “short-cut” access or “jalan tikus” which might cause intrusion and/or encroachment between both estates. Need full cooperation to resolve the issue.
	<b>Management Responses:</b> Estate management has established a plan to conduct meeting more often with neighbour estate on top of existing stakeholder consultation meeting conducted once a year. Meeting invitation to be made 2 weeks in prior & appropriate action for issues to be taken in timely manner where during recent meeting, estate AP, Sarjan PB SAM has explained patrolling time and action including boundary drain construction at potential encroached area found. There’s also few “drain-bridge” been demolished upon sighted during patrolling activities. Management suggested neighbours to create WhatsApp group for ease of communication among neighbouring estates.
	<b>Audit Team Findings:</b> Action already been taken by estate management whom also aware on the issue mentioned. No further issue.
	<b>Feedbacks:</b>

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2	Sundry shop operator: Having no issue operating sundry shop within Genting estates for more than 10 years
	<b>Management Responses:</b> Positive comments noted.
	<b>Audit Team Findings:</b> No further issue.
3	<b>Feedbacks:</b> Mill suppliers: No issue in products supply pricing and payment. Has long business relationship with company for more than 10 years.
	<b>Management Responses:</b> Positive comments noted.
	<b>Audit Team Findings:</b> No further issue.
4	<b>Feedbacks:</b> CLC teacher: Estate managements always visits and contributes to school programs and activities. 100% of children among estate workers are schooling at CLC including from neighbour estate. School facilities were well maintained by company.
	<b>Management Responses:</b> Positive comments noted.
	<b>Audit Team Findings:</b> No further issue.
5	<b>Feedbacks:</b> Crèche minder: good crèche facilities provided by company. Sufficient minder to take care of children.
	<b>Management Responses:</b> Facilities provided to ensure workers children wellbeing.
	<b>Audit Team Findings:</b> No further issue.

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<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<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 Tanjung Palm Oil Mill has complied with the RSPO P&amp;C MYNI 2014 &amp; 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 Tanjung Palm Oil Mill Certification Unit is approved &amp; continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> Hafriazhar Mohd Mokhtar	<b>Name:</b> Arunan Kandasamy
<b>Company Name:</b> BSI Services Malaysia Sdn Bhd	<b>Company Name:</b> Genting Plantations Berhad
<b>Title:</b> Lead auditor	<b>Title:</b> Sr Vice President-Plantation
<b>Signature:</b> 	<p><b>Signature:</b> <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>  <p>ARUNAN KANDASAMY SENIOR VICE PRESIDENT PLANTATION (MALAYSIA)</p>
<b>Date:</b> 14/1/2020	<b>Date:</b> 15/1/2020

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance
<b>Principle 1: Commitment to Transparency</b>		
<b>Criterion 1.1:</b> Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSP0 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 RSP0 Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	<p>Genting Plantations Berhad had issued a list of documents that could be accessed by the stakeholders to all the stakeholders during the stakeholder meeting or made via postage to the stakeholders. The documents accessible among others are as follows;</p> <ul style="list-style-type: none"> <li>a) All the policies,</li> <li>b) SEIA report and the management plan,</li> <li>c) Complaint &amp; grievances procedure.</li> </ul> <p>Interview with the stakeholders such as contractors, local communities and internal workers confirmed that they are aware of such availability and understood the rights to participate in the discussion.</p> <p>Evidence available as per records of external stakeholder meeting conducted at Genting Tanjung Estate Club House; Date: 21/10/2019 and external stakeholder meeting involved Government Agencies conducted at Genting Plantation Office Sabah (GPOS) Sandakan on 30/10/2019 attended by Balai Polis Sukau, Jabatan Perkhidmatan Veterinar Sandakan, Pejabat Kesihatan Daerah Kinabatangan, Klinik Kesihatan Batu Putih, Jabatan Pengangkutan Jalan Sandakan and Jabatan Hidupan Liar Kota Kinabatangan.</p> <p>Information also provided through internal stakeholder meeting conducted on 28/8/2019 for Genting Tenegang Estate, 29/8/2019 for Genting Layang Estate and 20/8/2019 for Genting Tanjung Oil Mill.</p>	<p>Complied</p>

<p>1.1.2</p>	<p>Records of requests for information and responses shall be maintained. -Major compliance</p>	<p>The management is committed in communicating adequate information to the stakeholders. Among others information requested as summarised below; Genting Tenegang Estate: - Complaints/Grievances Record Book (Buku Rekod Aduan/Kilanan) – latest complaints ref. # 036 dated 1/10/2019 by workers on housing damages – resolved by estate management on 4/10/2019 - Enquiry Register Book – latest external enquiry ref. # 017 dated 14/10/2019 received from Hospital Kinabatangan (Unit Tabung Darah Kawasan Kinabatangan) to invite on blood donation campaign agreed by management to be conducted on 29/10/2019  Genting Layang Estate: - Complaints/Grievances Record Book (Buku Rekod Aduan/Kilanan) – latest complaints ref. # 053 dated 28/10/2019 by workers on rain gutter damages –resolved by estate management on 30/10/2019 &amp; complaint received during workers committee meeting on house toilet blockages (complaint ref. # 052 - Enquiry Register Book – latest external enquiry ref. # 010 dated 16/10/2019 received from Pejabat Kesihatan Kinabatangan (Unit Denggi) to request for information on employees list an layout plan of estate’s housing, office and store buildings and provided by management accordingly  Genting Tanjung Oil Mill Estate: - Complaints/Grievances Record Book (Buku Rekod Aduan/Kilanan) – latest complaints ref. # 056 dated 7/10/2019 by DOSH Sandakan on the mill inspection matters which has been resolved and responded by the mill management to DOSH as per letter ref. # GTOM/19/10/073 dated 31/10/2019 - Enquiry Register Book – latest external enquiry ref. # 031 dated 2/10/2019 received from Kementerian Pendidikan Dan Kebudayaan</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		Sekolah Indonesia Kota Kinabalu (SIKK) CLC Genting Tanjung requesting for providing bus transport for CLC school children program on 10-13/10/2019 and approved by the mill management	
<b>Criterion 1.2:</b> 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.			
1.2.1	Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none"> <li>• Land titles/user rights (Criterion 2.2);</li> <li>• Occupational health and safety plans (Criterion 4.7);</li> <li>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</li> <li>• HCV documentation (Criteria 5.2 and 7.3);</li> <li>• Pollution prevention and reduction plans (Criterion 5.6);</li> <li>• Details of complaints and grievances (Criterion 6.3);</li> <li>• Negotiation procedures (Criterion 6.4);</li> <li>• Continual improvement plans (Criterion 8.1);</li> <li>• Public summary of certification assessment report;</li> <li>• Human Rights Policy (Criterion 6.13).</li> </ul> - Major compliance –	The publicly available documents were established and listed in the respective criterions in this checklist among others as follows; <ul style="list-style-type: none"> <li>a) Sustainability Policy; Rev. 00; Date: 3/8/2009</li> <li>b) Environmental Policy; Rev. 00; Date: 5/10/2009</li> <li>c) People Policy; Rev. 00; Date: 3/8/2009</li> <li>d) Sexual Harassment Policy; Rev. 00; Date: 3/8/2009</li> <li>e) Safety and Health Policy; Rev. 01; Date: 1/7/2015</li> <li>f) Zero Burning Policy; Rev. 00; Date: 10/8/2011</li> <li>g) Food Safety Policy; Rev. 00; Date: 2/2/2010</li> <li>h) Whistleblower Policy; Rev. 00; Date: 4/4/2013</li> <li>i) MSPO Policy; Rev. 00; Date: 18/3/2014</li> <li>j) Policy on Ethical Conduct and Integrity; Rev. 00; Date: 22/6/2015</li> <li>k) Social Policy (Incorporating Special Labour and Human Rights requirements); Rev. 00; Date: 22/6/2015</li> </ul> <i>All policies were available in dual language (BM &amp; English) and signed by Genting Plantations Berhad President &amp; COO.</i>	Complied
<b>Criteria 1.3:</b> Growers and millers commit to ethical conduct in all business operations and transactions.			

Criterion / Indicator	Assessment Findings	Compliance
<p>1.3.1</p> <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. -Minor compliance</p>	<p><u>Tenegang Estate:</u> Communicated during policy briefing session dated 11/10/2019 for policies as following:</p> <ul style="list-style-type: none"> <li>- Environmental Policy</li> <li>- Human Policy</li> <li>- Sustainable Policy</li> <li>- Sexual Harassment Policy</li> <li>- Occupational Safety &amp; Health Policy</li> <li>- Zero Burning Policy</li> <li>- Food Safety Policy</li> <li>- MSPO Policy</li> <li>- Social Policy</li> <li>- Personal Data Protection Policy</li> <li>- Whistleblowing Policy</li> <li>- Integrity &amp; Ethic Policy</li> </ul> <p>Briefing of all policies including Ethical Conduct &amp; Integrity Policy was conducted on 4/3/2019 by Genting Tanjung Oil Mill as per training record ref. # PM-MGR-05-F02-0.</p>	<p>Complied</p>
<p><b>Principle 2: Compliance with applicable laws and regulations</b></p>		
<p><b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.</p>		

<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available.          - Major compliance -</p>	<p>Genting Tanjung Oil Mill (GTOM) additional permits:          - Permit Wanita Bekerja Malam; Seksyen 75, Ordinan Buruh (Sabah Bab 67); Serial # 600-1/2/13/78(05/KBN/2018-067); Validity period: 5/4/2018–5/4/2020          - Permit Sekatan Kerja Lebih Masa; Seksyen 104(7), Ordinan Buruh (Sabah Bab 67); Serial # 600-1/2/13/78(08/KBN/2018-068); Validity period: 5/4/2018-5/4/2020</p> <p>Genting Tanjung Oil Mill and supply base had continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team as sampled follows:</p> <p><u>Genting Tenegang Estate:</u>          a) Jabatan Tenaga Kerja Sabah – Lesen Untuk Menggaji Pekerja Bukan Pemastautin (Seksyen 118, Ordinan Buruh (Sabah Bab 67)), License No. JTK.H.KBN.600-4/1/01261/0394, valid until 27/3/20.          b) Energy Commission license no: 2019/1218, serial: 36773 for capacity 136 kW, valid until 26/7/20.          c) Jabatan Tenaga Kerja Sabah (Kementerian Sumber Manusia), Permit Potongan Daripada Gaji Pekerja, Seksyen 113(4), Ordinan Buruh (Sabah Bab 67), S/N#600-1/2/13/9(11/KBN/2019-0170), valid until 18/6/21          d) MPOB License No. 504760102000, valid until 30/6/20.          e) Negeri Sabah, Malaysia, Ordinan Pelesenan Perdagangan, 1948 – Business License No. A274572, valid until 31/12/19.          f) Certificate of Fitness for Unfired Pressure Vessels: - (JKT15-Pin.1/87 PMT-SB/18 17008) – SB PMT 10351 (valid till 29/11/2019).          g) Diesel permit serial No: S000556, ref: PPDNKK.SDK.23/2005(SK), valid until 8/5/20.</p> <p><u>Genting Layang Estate:</u></p>	<p>Complied</p>
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		<p>a) Schedule Waste License Collector – Legenda Bumimas Sdn Bhd, License No. 003440, valid until 30/4/20</p> <p>b) Certificate of Fitness for Unfired Pressure Vessels: - (JKT15-Pin.1/87 PMT-SB/19 25406) – SB PMT 10427 (valid till 4/11/2020)</p> <p>c) Negeri Sabah, Malaysia, Ordinan Pelesenan Perdagangan, 1948 – Business License No. LD/2019/870, valid until 31/12/19.</p> <p>d) MPOB License No. 504759802000, valid until 30/6/20.</p> <p>e) Energy Commission license No: 2019/01221, serial: 36774 for capacity 93.5 kW, valid until 4/7/20.</p> <p>f) Diesel permit serial No: P: Q00066(SDK), ref: PPDNKK.SDK.09/2011(SK)BL22019013923, valid until 16/5/20.</p> <p>g) Jabatan Tenaga Kerja Sabah – Lesen Untuk Menggaji Pekerja Bukan Pemastautin (Seksyen 118, Ordinan Buruh (Sabah Bab 67)), License No. JTK.H.KBN.600-4/1/01261/0392, valid until 27/3/20.</p> <p>h) Jabatan Tenaga Kerja Sabah (Kementerian Sumber Manusia), Permit Potongan Daripada Gaji Pekerja, Seksyen 113(4), Ordinan Buruh (Sabah Bab 67), S/N#600-1/2/13/9(11/KBN/2019-0169), valid until 18/6/21</p> <p>i) Sabah Small Ship License, Ref. No. SN-2019/P-142/2540, valid until 8/10/20.</p> <p><u>Genting Tanjung POM:</u></p> <p>a) Seksyen 22(1) EQA 1974 – Lesen Melanggar had-had pelepasan yang boleh diterima dibawah Peraturan Kualiti Alam Sekeliling (Udara Bersih) 2014, License No. 005233, valid until 3/9/20</p> <p>b) Seksyen 18(1), EQA 1974 – Lesen untuk Menduduki atau menggunakan premis yang ditetapkan, License No. 003584, valid until 30/6/20</p> <p>c) Certificate of Fitness for Unfired Pressure Vessels: - (JKT15-Pin.1/87 PMT-SB/19 25870) – Softener Vessel- SB PMT 12188 (valid till 4/11/2020)</p> <p>d) MPOB License No. 500137704000, valid until 30/11/20</p> <p>e) Energy Commission license No: 2019/01216, serial: 36767 for capacity 4240 kW, valid until 24/7/20</p>	
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Criterion / Indicator	Assessment Findings	Compliance
	f) Jabatan Tenaga Kerja Sabah – Lesen Untuk Menggaji Pekerja Bukan Pemastautin (Seksyen 118, Ordinan Buruh (Sabah Bab 67)), License No. JTK.H.KBN.600-4/1/10401/0379, valid until 27/3/20. g) Jabatan Tenaga Kerja Sabah (Kementerian Sumber Manusia), Permit Potongan Daripada Gaji Pekerja, Seksyen 113(4), Ordinan Buruh (Sabah Bab 67), S/N#600-1/2/13/9(11/KBN/2019-0027), valid until 9/01/21 h) Diesel permit serial No: P: S000576, ref: PPDNKK.SDK.09/2014(SK), valid until 23/6/20 i) Fire Services (Fire Certificate) Regulations 2001 – Fire Certificate S/N#309454, valid until 30/9/20 j) CEPPOME - S/N#CePPOME/00007 – Mr. Lee Kar Leong k) CePSWaM – S/N#CePSWaM/184918 – Mr. Ronlie Bin Ronney	
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	Complied

Criterion / Indicator	Assessment Findings	Compliance
2.1.3 A mechanism for ensuring compliance shall be implemented. - Minor compliance -	<p>Currently, the person/team responsible for monitoring the changes and communicating in Estate is the Assistant Manager and in POM is the Mill Engineer.</p> <p>The mechanisms for ensuring compliance including checking of the implementation of procedures that were made among others through;</p> <ul style="list-style-type: none"> <li>- Internal audit, safety and health meeting</li> <li>- Daily supervision and inspection by estates executives and mill engineers.</li> <li>- Routine inspection (workplace inspection) by Assist Manager, staff and hospital assistant.</li> </ul> <p>Additionally, inspection and advisory visits were also conducted by Sustainability and Safety department from HQ/Regional Office.</p>	<p>Complied</p>
2.1.4 A system for tracking any changes in the law shall be implemented. - Minor compliance -	<p>Genting Plantations Berhad has established a documented Procedures on Regional, National and International Laws (Doc: SMPGPB-21; revision 01 dated 14/08/2014) for tracking any changes in the law.</p> <p>For the changes of laws, the company will refer to as below:</p> <ol style="list-style-type: none"> <li>1. Notification of changes from various source of information</li> <li>2. Monitoring for changes in the Law</li> <li>3. Clarification and review on the changes</li> <li>4. Updating of the Legal register administered internally</li> <li>5. Notification to the operating units and/or the relevant person in charge</li> </ol> <p>Currently, the person/team responsible for monitoring the changes and communicating in Estate is the Assistant Manager and in POM is the Mill Engineer.</p>	<p>Complied</p>
<p><b>Criterion 2.2:</b>            The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p>		

<p>2.2.1</p>	<p>Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available.          - Major compliance -</p>	<p>Documents showing legal ownership sighted available as following:  <u>Genting Tenegang Estate:</u></p> <ul style="list-style-type: none"> <li>• Land titles/user rights – 1 title:             <ul style="list-style-type: none"> <li>i) Title # Country Lease (CL) 095317463; 4,047ha; 1/1/1990–31/12/2088 (99 years lease); Lot/District: Lot 095317463, Kinabatangan, Sabah</li> </ul> </li> <li>• Sabah State Government Quit rent payment receipt # 07201905001234; Date: 28/5/2019; Ref. # 095317463</li> <li>• Area Statement as per Monthly Progress Report for the Month of Oct-19; Div. 9: 906.97ha; Div. 10: 856.36ha; Div. 11: 1,024.76ha; Div. 12: 1,258.77ha</li> <li>• MPOB license # 504760102000; 1/7/2019-30/6/2020; Area reg.: 3,652.54ha</li> </ul> <p>* Noted that inconsistency of area between land titles and MPOB license due to a portion 394.32ha area managed by Genting Tenegang Estate w.e.f. 1/1/2011.</p> <p><u>Genting Layang Estate:</u>          Sighted the following:</p> <ul style="list-style-type: none"> <li>• Land titles/user rights – 2 titles:             <ul style="list-style-type: none"> <li>i) Title # Country Lease (CL) 095318817; 1,683ha; 1/1/1992–31/12/2090 (99 years lease); Lot/District: Lot 095318817, Kinabatangan, Sabah</li> <li>ii) Title # Country Lease (CL) 095317463; 4,047ha; 1/1/1990–31/12/2088 (99 years lease); Lot/District: Lot 095317463, Kinabatangan, Sabah</li> </ul> </li> <li>• Jabatan Tanah Dan Ukur Sabah, Malaysia; Notis Peringatan Pembayaran Sewa Tanah (Quit Rent); No. Geran: 095318817; Jumlah Sewa Tanah Yang Perlu Dibayar: RM -1187,155.00; Nilai tahunan: RM 24,954.00</li> <li>• Area Statement as at October 2019; Monthly Management Report (MMR); Div. 13: 1059.78ha; Div. 14: 1017.63ha; from GTGE: 394.41ha</li> </ul>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance																	
	<p>(Memorandum: Hectarage Movement; Ref. # GPOS-VPGM/089/SK18; Date: 30/11/2018)</p> <ul style="list-style-type: none"> <li>• MPOB license # 504759802000; 1/7/2019-30/6/2020; Area reg.: 2077.41ha</li> </ul> <p>* Noted that inconsistency of area between land titles and MPOB license due to management of only 394.41ha of area from (CL) 095317463 which belonged to Genting Tenegang Estate.</p> <p><u>Genting Tanjung Oil Mill:</u>            Title under Genting Tanjung Estate sighted as following:            Title # Country Lease (CL) 095327129; 192.4ha; 1/1/1998– 31/12/2096 (99 years lease); Lot/District: Lot 095327129, Kinabatangan, Sabah</p>																		
<p>2.2.2</p>	<p>Legal boundaries shall be clearly demarcated and visibly maintained.            - Minor compliance -</p>	<p>The Estate has maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers the estate visited at the following points confirmed that they were clearly marked and maintained.</p> <table border="1" data-bbox="1055 948 1776 1114"> <thead> <tr> <th></th> <th><b>Estate</b></th> <th><b>Location /Point</b></th> <th><b>Neighbouring Property</b></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tenegang</td> <td>P92 Block 23</td> <td>JC Chang Plantations</td> </tr> <tr> <td>2</td> <td>Layang</td> <td>P99 Block 22</td> <td>Malbumi Estate</td> </tr> <tr> <td>3</td> <td>Layang</td> <td>P00 Block 2A</td> <td>Teh Ah Bu Estate.</td> </tr> </tbody> </table> <p>The mill is separated through fencing around the vicinity. The effluent ponds are located at a distance from the processing area as larger space is required. The mill is located within the host estate belonging to the same parent company and of same certification unit</p>		<b>Estate</b>	<b>Location /Point</b>	<b>Neighbouring Property</b>	1	Tenegang	P92 Block 23	JC Chang Plantations	2	Layang	P99 Block 22	Malbumi Estate	3	Layang	P00 Block 2A	Teh Ah Bu Estate.	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
<p>2.2.3 Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC).                      - Minor compliance -</p>	<p>The process established as Sustainability Management Procedure for Negotiation, Compensation and Handling Procedure; SMP-GPB-18; Rev. 03; Date: 29/12/2017.</p> <p>There was a dispute in GLYE as per records (Details of dispute and resolution process at Division 13/14; Dated 26/10/2019) where according to procedure, the situation was fall under Type 1 Issue i.e Third party property (plantation companies, private estate) overplanting into estate land; Situation 2: Demand raised from the stakeholders. The recommended resolution as per procedure where estate to refer to VP/GM-Plantation, who shall then escalate the issue to top management and related departments for further advice. Any compensation requested shall be decided by top management based on a case by case basis.</p> <p>The dispute involved encroachment by neighbouring plantations i.e. Tey Ah Bu Sdn. Bhd. On a total area of 3.354ha which involved 333 palms. Current progress recorded that GLYE has negotiated with disputed party and it was recorded that the party agreed and understood on Genting Plantations dispute procedure with all clear and visible markings and numbering of boundary stone were conducted together based on boundary survey map. Records shown that GLYE management has escalated the issue to top management on 26/10/2019 whilst proposing that based on the negotiation done and boundary survey map by Jurukur Masa Sdn. Bhd., the current status quo is preserved until further decision by Genting Plantations Top Management. As of the date of visit, the issue still pending and awaiting on decision by top management.</p> <p>The process however confirmed to be handled as per procedure (SMP-GPB-18) with both party accepted the current status quo with free, prior and informed consent (FPIC).</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	Complied
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	Complied
<b>Criterion 2.3:</b> 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.		
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>2.3.2 Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include:</p> <ul style="list-style-type: none"> <li>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;</li> <li>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;</li> <li>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.</li> </ul> <p>- Minor compliance -</p>	<p>Except for the land dispute at Genting Layang Estate (GLYE), there's no any land conflict with communities presence in other estates within Genting Tanjung supply base.</p>	<p>Complied</p>
<p>2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>-Minor compliance</p>	<p>Except for the land dispute at Genting Layang Estate (GLYE), there's no any land conflict with communities presence in other estates within Genting Tanjung supply base.</p>	<p>Complied</p>
<p>2.3.4 Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel.</p> <p>-Major compliance</p>	<p>Except for the land dispute at Genting Layang Estate (GLYE), there's no any land conflict with communities presence in other estates within Genting Tanjung supply base.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<b>Principle 3: Commitment to long-term economic and financial viability</b>		
<b>Criterion 3.1:</b>		
There is an implemented management plan that aims to achieve long-term economic and financial viability.		
3.1.1	<p>A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders.</p> <p>- Major compliance -</p> <p>Genting Tanjung Production Unit had established a management plan with 3-year projection plan (FY20/21 and FY21/22, FY22/23). The palm oil mill budget includes the projected FFB processed, CPO and PK production, OER and KER, production cost, training, insurance, environment conservation.</p> <p>Genting Tenegang Estate: Estate has the management plan for FY19/20 with 3-year projection plan for (FY20/21, FY2021/22 and FY22/23) which include on Buildings (Residential, Plant &amp; Machinery, Roads &amp; Bridges, Furniture &amp; Fittings).</p> <p>Genting Layang Estate: Estate has the management plan for FY19/20 with 3-year projection plan for (FY20/21, FY2021/22 and FY22/23) which include on Replanting Expenditure, Crop Production, Yield per Ha, Buildings (Residential, Plant &amp; Machinery, Roads &amp; Bridges, Furniture &amp; Fittings).</p> <p>Genting Tanjung POM: Mill has the management plan for FY19/20 with 3-year projection plan for (FY20/21, FY2021/22 and FY22/23) which include projection budget on Extraction Rates (%) on OER &amp; KER, Capital Expenditure Budget on Buildings – Residential, Others, Plant &amp; Machinery and Motor Vehicle.</p>	Complied

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 -	<p>The replanting programs for the estates are compiled as follows. The program is reviewable on an annual basis which is subject to amendment. All figures in hectares otherwise stated.</p> <table border="1"> <thead> <tr> <th>No</th> <th>Estate</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tenang</td> <td>462</td> <td>284</td> <td>404</td> <td>581.85</td> <td>605.88</td> </tr> <tr> <td>2</td> <td>Layang</td> <td>-</td> <td>-</td> <td>69.68</td> <td>172.59</td> <td>174.38</td> </tr> </tbody> </table>						No	Estate	2019	2020	2021	2022	2023	1	Tenang	462	284	404	581.85	605.88	2	Layang	-	-	69.68	172.59	174.38	Complied
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<b>Principle 4: Use of appropriate best practices by growers and millers</b>																													
<b>Criterion 4.1:</b> Operating procedures are appropriately documented, consistently implemented and monitored.																													

<p>4.1.1</p>	<p>Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p>	<p>The estates and mills are guided by the following manuals</p> <ul style="list-style-type: none"> <li>a) Genting Plantations Oil Palm Manual OPM issued on 9/11/99 updated June 2013. <ul style="list-style-type: none"> <li>- Land preparation/nursery/planting/soil conservation/</li> <li>- Pest &amp; Disease/weeding/fertiliser application/harvesting</li> <li>- Managing difficult soils/crop forecast</li> </ul> </li> <li>b) Genting Oil Mill – Safe Operating Procedure Nov 2011. <ul style="list-style-type: none"> <li>- Crane/empty bunch hopper/oil room /press &amp; digester</li> <li>- Kernel plant/boiler station/engine/effluent pond</li> <li>- Workshop operations/decanter/despatches</li> <li>- Bio Polishing Plant</li> </ul> </li> <li>c) Sustainability Management Procedure Manual 1/8/13 revised in 7/2/19.</li> <li>d) Environmental Control Procedure dated 15/11/11.</li> <li>e) OSH Manual dated 1/1/2010.</li> <li>f) System Procedure 01/8/2017</li> <li>g) Environmental Control Procedure – 01/9/2018</li> <li>h) Store Operating Manual – 2014</li> <li>i) Standard Operating Procedure Genting Sabah Estates rev 3 Oct 13.</li> <li>j) Jobs description - 2012</li> </ul> <p>The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections</p> <ul style="list-style-type: none"> <li>a) OPM No 7. Manuring of oil palm</li> <li>b) OPM no 13. Managing difficult soils</li> </ul> <p>The estate and mill operations were guided through the manuals and SOPs. The procedures as documented in the manuals and SOPs were disseminated to the staff/workers through morning briefings and trainings. The manuals are kept in the main office for references of employees particularly for the supervisory personnel. Field inspection and</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		interviews with the workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs. The SOPs included the operation activities in the estates and the mills from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and dispatch of CPO & PK and security in the CU.	
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	The mechanisms to check the implementation of procedures were made among others through; - internal audit, safety and health meeting - daily supervision and inspection by estates executives and mill engineers. - Routine inspection (workplace inspection) by Assist Manager, staff and hospital assistant. - Inspection and advisory visits by Sustainability and Safety department from HQ/Regional Office Records of monitoring as shown in 4.1.3	Complied
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	The monitoring of the SOP implementation was closely made by the all levels of the supervisory personnel with records maintained and checked. Among others the records are; a) Daily production/work records for the core activities at the estates/mill b) field cost book, c) chemical consumption record d) mature/immature field work program - fertilizer application, - herbicide spraying, - rat baiting , - Harvesting and collection of FFB. All the above records were kept for a minimum period of 12 months	Complied

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<p>4.1.4 The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB).                      - Major compliance -</p>	<p>The origins of all third-party sourced Fresh Fruit Bunches (FFB) is verified via list of approved FFB supplier rev:6, dated 28/7/17. The legality of the FFB supplier is checked and verified. For non-certified FFB, no traceability identification stamped in the FFB delivery note and only stamped for certified FFB under RSPO and ISCC.                      Records were maintained details among others as listed below;</p> <table border="1" data-bbox="1039 624 1796 954"> <thead> <tr> <th></th> <th>Supplier</th> <th>Date</th> <th>Vehicle no</th> <th>driver</th> <th>Weight kg</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Malbumi Estate</td> <td>12/11/19</td> <td>SS7697 F</td> <td>SHAN</td> <td>7990</td> </tr> <tr> <td>2</td> <td>Tenera Eco Plntn</td> <td>12/11/19</td> <td>SS1688 J</td> <td>MUHD</td> <td>8460</td> </tr> <tr> <td>3</td> <td>Ace Foremost</td> <td>11/11/19</td> <td>SD4768 C</td> <td>ROMA</td> <td>5050</td> </tr> <tr> <td>4</td> <td>Anchor Prospects</td> <td>12/11/19</td> <td>SAB603 5A</td> <td>KOSMA S</td> <td>4650</td> </tr> </tbody> </table> <table border="1" data-bbox="1039 986 1796 1219"> <thead> <tr> <th></th> <th>Supplier</th> <th>MPOB License No</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Malbumi Estate Sdn Bhd</td> <td>502782102000</td> <td>30/11/19.</td> </tr> <tr> <td>2</td> <td>Tenera Eco Plantation Sdn Bhd,</td> <td>56298500200</td> <td>31/07/20</td> </tr> <tr> <td>3</td> <td>Ace Foremost SB</td> <td>503622702000</td> <td>31/1/20</td> </tr> <tr> <td>4</td> <td>Anchor Prospects Sdn Bhd</td> <td>540026002000</td> <td>31/5/20</td> </tr> </tbody> </table>		Supplier	Date	Vehicle no	driver	Weight kg	1	Malbumi Estate	12/11/19	SS7697 F	SHAN	7990	2	Tenera Eco Plntn	12/11/19	SS1688 J	MUHD	8460	3	Ace Foremost	11/11/19	SD4768 C	ROMA	5050	4	Anchor Prospects	12/11/19	SAB603 5A	KOSMA S	4650		Supplier	MPOB License No	Validity	1	Malbumi Estate Sdn Bhd	502782102000	30/11/19.	2	Tenera Eco Plantation Sdn Bhd,	56298500200	31/07/20	3	Ace Foremost SB	503622702000	31/1/20	4	Anchor Prospects Sdn Bhd	540026002000	31/5/20	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
<p>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 -</p>	<p>The estates and mills are guided by the following manuals</p> <ul style="list-style-type: none"> <li>k) Genting Plantations Oil Palm Manual OPM issued on 9/11/99</li> <li>l) Sustainability Management Procedure Manual 1/8/13 revised in 7/2/19.</li> <li>m) OSH Manual dated 1/1/2010.</li> <li>n) Environmental Control Procedure – 01/9/2018</li> <li>o) Store Operating Manual – 2014</li> <li>p) Standard Operating Procedure West Malaysia Estates 17/1/2011.</li> <li>q) Jobs description - 2012</li> </ul> <p>The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections</p> <ul style="list-style-type: none"> <li>c) OPM No 7. Manuring of oil palm</li> <li>d) OPM no 13. Managing difficult soils</li> </ul> <p>Other details as provided 4.1.1</p>	<p>Complied</p>

4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	<p>Fertiliser application program was monitored using records among others as described below;</p> <ul style="list-style-type: none"> <li>a) program sheets, bin cards,</li> <li>b) Field cost book, fertiliser application monitoring forms, etc.</li> <li>c) Reconciliation of empty bags versus the issuance.</li> </ul> <p>Records of programs and applications of fertilisers were reviewed by auditors. Review of the records showed that the actual fertilisers applied in 2018 were in line with the program.</p> <table border="1" data-bbox="972 643 1765 943"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Estate</th> <th rowspan="2">Field no</th> <th rowspan="2">Type</th> <th colspan="3">kg/palm</th> </tr> <tr> <th>Jan</th> <th>June</th> <th>Aug</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tenegang</td> <td>P92 B1</td> <td>NK Mix B AC</td> <td>2.50</td> <td>2.50</td> <td>0.00</td> </tr> <tr> <td></td> <td>Tenegang</td> <td>P92 B1</td> <td>NK B AC</td> <td>-</td> <td>2.00</td> <td>-</td> </tr> <tr> <td></td> <td>Tenegang</td> <td>P92 B18</td> <td>NK Mix B AC</td> <td>2.50</td> <td>2.25</td> <td>2.25</td> </tr> <tr> <td></td> <td>Tenegang</td> <td>P92 B23</td> <td>NK Mix B AC</td> <td>2.75</td> <td>2.00</td> <td>2.25</td> </tr> </tbody> </table> <table border="1" data-bbox="972 975 1765 1342"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Estate</th> <th rowspan="2">Field no</th> <th rowspan="2">Type</th> <th colspan="3">kg/palm</th> </tr> <tr> <th>Apr</th> <th>Jun</th> <th>Aug</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>Layang</td> <td>19</td> <td>NK Mix B AC</td> <td>2.25</td> <td>1.75</td> <td>1.00</td> </tr> <tr> <td></td> <td>Layang</td> <td>20</td> <td>NK Mix B AC</td> <td>2.25</td> <td>1.75</td> <td>1.00</td> </tr> <tr> <td></td> <td>Layang</td> <td>21</td> <td>BRP</td> <td>1.50</td> <td>-</td> <td>-</td> </tr> <tr> <td></td> <td>Layang</td> <td>21</td> <td>NK Mix B AC</td> <td>-</td> <td>3.00</td> <td>-</td> </tr> <tr> <td></td> <td>Layang</td> <td>21</td> <td>NK Mix B AS</td> <td>-</td> <td>-</td> <td>2.75</td> </tr> </tbody> </table>		Estate	Field no	Type	kg/palm			Jan	June	Aug	1	Tenegang	P92 B1	NK Mix B AC	2.50	2.50	0.00		Tenegang	P92 B1	NK B AC	-	2.00	-		Tenegang	P92 B18	NK Mix B AC	2.50	2.25	2.25		Tenegang	P92 B23	NK Mix B AC	2.75	2.00	2.25		Estate	Field no	Type	kg/palm			Apr	Jun	Aug	2	Layang	19	NK Mix B AC	2.25	1.75	1.00		Layang	20	NK Mix B AC	2.25	1.75	1.00		Layang	21	BRP	1.50	-	-		Layang	21	NK Mix B AC	-	3.00	-		Layang	21	NK Mix B AS	-	-	2.75	Complied
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<p>4.2.3 There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status.                      - Minor compliance -</p>	<p>Periodic tissue and soil sampling were carried out in the estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. Soil samplings are made on a 5 year cycle to detect the following analysis. The duration of soil sampling has been extended to a 10 year cycle following a ban issue of soil import permit by DOA dated 29/3/19. The recent sampling was made on 25/04/2015 report <i>ref no BR05/2015</i> (Tenegang Estate and Layang Estate on 23/12/2013.                      a) PH, Carbon                      b) Total N, P, K, Ca, Mg, Na                      Foliar analysis by <i>Genting Research Plantations Centre</i> was carried out on 09/1/19 to facilitate the 2019 fertilizer programme.</p>	<p>Complied</p>

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<p>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 -</p>	<p>The estate applies EFB and effluent being land application having records as follows;</p> <table border="1" data-bbox="972 491 1765 694"> <thead> <tr> <th></th> <th>Estate</th> <th>Field no</th> <th>Nutrient</th> <th>mt (Program 2019)</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tenegang</td> <td>Block 39</td> <td>EFB</td> <td>61.93</td> <td>52.69</td> </tr> <tr> <td></td> <td>Tenegang</td> <td>Block 39</td> <td>EFB</td> <td>387.9</td> <td>52.69</td> </tr> <tr> <td>2</td> <td>Layang</td> <td>Block 18</td> <td>EFB</td> <td>66.71</td> <td>39.61</td> </tr> <tr> <td></td> <td>Layang</td> <td>Block 17</td> <td>EFB</td> <td>88.80</td> <td>49.19</td> </tr> </tbody> </table> <p>Guidelines for EFB application adopted by the estates at rate of mature 10mt/ha. immature at 20mt/ha. The effluent application is in Tanjung Estate at the following;</p> <table border="1" data-bbox="972 855 1765 1023"> <thead> <tr> <th></th> <th>Field</th> <th>Block no</th> <th>ha</th> <th></th> <th>Field</th> <th>Block no</th> <th>ha</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>1991</td> <td>14</td> <td>48.70</td> <td>4</td> <td>1991</td> <td>18</td> <td>58.82</td> </tr> <tr> <td>2</td> <td>1991</td> <td>16</td> <td>56.19</td> <td>5</td> <td>2015</td> <td>10</td> <td>28.83</td> </tr> <tr> <td>3</td> <td>1991</td> <td>17</td> <td>56.80</td> <td>6</td> <td>2015</td> <td>19</td> <td>48.67</td> </tr> </tbody> </table> <p>The decanter cake is being applied on the following estates as at Jan-Oct 2019.</p> <table border="1" data-bbox="972 1155 1765 1289"> <thead> <tr> <th></th> <th>Estates</th> <th>No of trips</th> <th>Tonnage</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Genting Bahagia</td> <td>987</td> <td>8642</td> </tr> <tr> <td>2</td> <td>Genting Tenegang</td> <td>12</td> <td>116</td> </tr> <tr> <td>3</td> <td>Genting Tanjung</td> <td>113</td> <td>1828</td> </tr> </tbody> </table>		Estate	Field no	Nutrient	mt (Program 2019)	Ha	1	Tenegang	Block 39	EFB	61.93	52.69		Tenegang	Block 39	EFB	387.9	52.69	2	Layang	Block 18	EFB	66.71	39.61		Layang	Block 17	EFB	88.80	49.19		Field	Block no	ha		Field	Block no	ha	1	1991	14	48.70	4	1991	18	58.82	2	1991	16	56.19	5	2015	10	28.83	3	1991	17	56.80	6	2015	19	48.67		Estates	No of trips	Tonnage	1	Genting Bahagia	987	8642	2	Genting Tenegang	12	116	3	Genting Tanjung	113	1828	<p>Complied</p>
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4.3.1	Maps of any fragile soils shall be available. - Major compliance -	<p>The soil series for both the estates comprises of the following. Soil maps are prepared by <i>Genting Plantations Research Centre</i>. The date of map preparation was established on 29/10/2018 and 14/8/2017 for Layang Estate</p> <table border="1"> <thead> <tr> <th colspan="8"><b>Tenegang Estate</b></th> </tr> <tr> <th></th> <th>Soil type</th> <th>ha</th> <th>%</th> <th></th> <th>Soil</th> <th>ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Buran</td> <td>2521.14</td> <td>68.29</td> <td>6</td> <td>Liku/de ep</td> <td>340.33</td> <td>9.22</td> </tr> <tr> <td>2</td> <td>kumansi</td> <td>281.64</td> <td>7.63</td> <td>7</td> <td>Tepus</td> <td>370.63</td> <td>10.04</td> </tr> <tr> <td>3</td> <td>lating</td> <td>178.00</td> <td>4.82</td> <td>8</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="8"><b>Layang Estate</b></th> </tr> <tr> <th></th> <th>Soil type</th> <th>ha</th> <th>%</th> <th></th> <th>Soil</th> <th>ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Lokan</td> <td>20.83</td> <td>1.05</td> <td>6</td> <td>lungmanis</td> <td>20.35</td> <td>1.03</td> </tr> <tr> <td>2</td> <td>Bidu Bidu</td> <td>45.36</td> <td>2.29</td> <td>7</td> <td>k/batang an</td> <td>1706.02</td> <td>86.25</td> </tr> <tr> <td>3</td> <td>Kretam</td> <td>185.44</td> <td>9.38</td> <td>8</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>						<b>Tenegang Estate</b>									Soil type	ha	%		Soil	ha	%	1	Buran	2521.14	68.29	6	Liku/de ep	340.33	9.22	2	kumansi	281.64	7.63	7	Tepus	370.63	10.04	3	lating	178.00	4.82	8	-	-	-	<b>Layang Estate</b>									Soil type	ha	%		Soil	ha	%	1	Lokan	20.83	1.05	6	lungmanis	20.35	1.03	2	Bidu Bidu	45.36	2.29	7	k/batang an	1706.02	86.25	3	Kretam	185.44	9.38	8	-	-	-	Complied
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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 -	<p>Both the estates had also implemented prevention of soil erosion measures such as construction of moisture conservation pits (MCP) in steep slope areas. Cover crops were observed to be in place as the CU management had generally encouraged the establishment of soft growth. Visits to the site found that significant areas of the ground were covered with <i>Neprolepis biserrata</i>. Most slopes had well established <i>Mucuna.bracteata</i>. The topography details of the estate is shown below;</p> <table border="1" data-bbox="1025 651 1767 1086"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Terrain classes / degree</th> <th colspan="2">Tenegang Estate</th> <th colspan="2">Layang Estate</th> </tr> <tr> <th>Ha</th> <th>%</th> <th>Ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Flat 0-2</td> <td>3411.38</td> <td>92.40</td> <td>1479.19</td> <td>74.77</td> </tr> <tr> <td>2</td> <td>Undulating 2-6</td> <td>278.62</td> <td>7.55</td> <td>401.67</td> <td>20.30</td> </tr> <tr> <td>3</td> <td>Rolling 6-12</td> <td>1.75</td> <td>0.05</td> <td>92.05</td> <td>4.65</td> </tr> <tr> <td>4</td> <td>Hilly 12-20</td> <td>0</td> <td>0</td> <td>5.50</td> <td>0.28</td> </tr> <tr> <td>5</td> <td>Steep 20-25</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>6</td> <td>Very steep &gt;25</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>7</td> <td>total</td> <td>3691.75</td> <td>100</td> <td>1978.41</td> <td>100</td> </tr> </tbody> </table>					Terrain classes / degree	Tenegang Estate		Layang Estate		Ha	%	Ha	%	1	Flat 0-2	3411.38	92.40	1479.19	74.77	2	Undulating 2-6	278.62	7.55	401.67	20.30	3	Rolling 6-12	1.75	0.05	92.05	4.65	4	Hilly 12-20	0	0	5.50	0.28	5	Steep 20-25	0	0	0	0	6	Very steep >25	0	0	0	0	7	total	3691.75	100	1978.41	100	Complied
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4.3.3 A road maintenance programme shall be in place. - Minor compliance -	<p>During the field visit, it was observed that the main and field roads were in satisfactory condition and accessibility was made possible by regular maintenance. There was evidence of road maintenance programmes which consist of the following works</p> <ul style="list-style-type: none"> <li>a) road resurfacing with grading &amp; compaction</li> <li>b) culvert maintenance,</li> <li>c) Road side pruning.</li> <li>d) Planting of <i>Guatemala /vertivar</i> grasses</li> </ul> <p>Work schedule were staggered into various fields and months. Concentration of timing is targeted in Jan – May avoiding the monsoon months. Duration of work stretched from Jan – Dec priority wok to be carried out during the dry months. Road maintenance program for both the estates were sighted and verified. Provisions were in the annual budget i.e. Tenegang Estate RM 434000 (<i>RM11.15/ha</i>) and Layang Estate RM263000 (<i>RM158.26/ha</i>).</p>	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 -	There is no peat soil in both the estates. This is verified through the soil map, site visits and interviews with the estates executives/staff.	Complied
4.3.5 Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	There is no peat soil in both the estates. This is verified through the soil map, site visits and interviews with the estates executives/staff.	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 -	There is no peat soil in both the estates. This is verified through the soil map, site visits and interviews with the estates executives/staff.	Complied
<p><b>Criterion 4.4:</b> Practices maintain the quality and availability of surface and ground water.</p>		

<p>4.4.1</p>	<p>An implemented water management plan shall be in place. - Minor compliance -</p>	<p>The CU had its Water Management Plan for year 2019 which was developed in order to maintain the quality and availability of natural water resources by practicing efficient water consumption through various methods such as</p> <ul style="list-style-type: none"> <li>a) implementation of rain water harvest, construction of water gate for effective management of collection/main drain,</li> <li>b) establishment of <i>mucuna bracteata</i> to prevent erosion, side drain at field road to control water, frond stacking,</li> <li>c) Enhancement of ground vegetation at bare ground area.</li> </ul> <p>All estates received supply of piped treated water from own source (self treatment) for the domestic consumption. There was rain harvest being practiced in the estates/mill. The general use of compound upkeep being initiated from the nearby water catchment. Water from triple rinsing of pesticide containers was reused for spraying. Records of rainfall data to assist in the water management plans were sighted from 2008. The estates adopted the following management plan in relation to water management. Last review was in 12 Sept 19 for the estates.</p> <table border="1" data-bbox="1039 975 1664 1375"> <thead> <tr> <th></th> <th>Key Areas</th> <th>Area of concern</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1</td> <td rowspan="2">Water source</td> <td>Government treated water</td> </tr> <tr> <td>Catchment pond</td> </tr> <tr> <td rowspan="3">2</td> <td rowspan="3">Efficient use of water</td> <td>Monitoring of pipe leakages</td> </tr> <tr> <td>Spraying pump maintenance</td> </tr> <tr> <td>Education and training</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">Renewable water source</td> <td>Monitoring of rainfall data</td> </tr> <tr> <td>Rain water captured at catchment pond</td> </tr> <tr> <td rowspan="3">4</td> <td rowspan="3">Water pollution</td> <td>Chemical mixing bay</td> </tr> <tr> <td>Workshop washing bay</td> </tr> <tr> <td>Water sampling 2x/year</td> </tr> </tbody> </table>		Key Areas	Area of concern	1	Water source	Government treated water	Catchment pond	2	Efficient use of water	Monitoring of pipe leakages	Spraying pump maintenance	Education and training	3	Renewable water source	Monitoring of rainfall data	Rain water captured at catchment pond	4	Water pollution	Chemical mixing bay	Workshop washing bay	Water sampling 2x/year	<p>Complied</p>
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<p>Layang Estate is a flood prone area as Sg Tenegang is crossing the estate. The affected fields are planted on a platform system a part of the mitigation initiative.</p> <p>Tanjung POM Water Management plan was updated on 26/10/19. Key areas emphasised among others as detailed below. There are also PIC and time line being shown in the management plan. The main source of water supply is from the estate <i>Danau Water Pond</i>.</p>																	
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<p>4.4.2</p>	<p>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 -</p>	<p>All the estates in the CU continues to protect the water courses and wetlands including maintaining and restoring appropriate riparian buffer zones at or before replanting along all natural waterways within the estates. This was witnessed as follows. Layang Estate had a corridor of life zone along the Sg Tenegang joint effort with WWF planted with forest trees beginning 2009.</p> <ul style="list-style-type: none"> <li>a) Tenegang Estate – Sg Ulu Tenegang P92 Block 15.</li> <li>b) Layang Estate – Sg Tenegang P99 Block 19</li> </ul> <p>Tenegang Estate water analysis (tested in Dynakey Laboratories Sdn Bhd after treatment results 12/9/19 as extracted on random basis are provided below;</p> <table border="1" data-bbox="1043 783 1825 1283"> <thead> <tr> <th colspan="3"><b>Tenegang Estate</b></th> <th><b>12/9/19</b></th> <th><b>15/7/19</b></th> </tr> <tr> <th>Parameter</th> <th>INQW S</th> <th>STD B</th> <th>Actual</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td>1 PH</td> <td>5-9</td> <td>6.5-9</td> <td>7.1</td> <td>6.5</td> </tr> <tr> <td>2 BOD</td> <td>&lt;100</td> <td>200</td> <td>0.2</td> <td>3.8</td> </tr> <tr> <td>3 COD</td> <td>&lt;12</td> <td>50</td> <td>&lt;15</td> <td>29</td> </tr> <tr> <td>4 S Solids</td> <td>&lt;300</td> <td>100</td> <td>&lt;2</td> <td>48</td> </tr> <tr> <td>5 Dissolved oxygen</td> <td>&lt;5.0</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>6 A Nitrogen</td> <td>&lt;2.7</td> <td>1.5</td> <td>0.04</td> <td>0.08</td> </tr> <tr> <td>7 Phosphorous</td> <td>-</td> <td>-</td> <td>0.6</td> <td>1.4</td> </tr> <tr> <td>8 E-coli</td> <td>-</td> <td>ND</td> <td>ND in 100 ml</td> <td>ND in 100 ml</td> </tr> <tr> <td>Total coliform</td> <td></td> <td>ND</td> <td>ND in 100 ml</td> <td>ND in 100 ml</td> </tr> </tbody> </table>	<b>Tenegang Estate</b>			<b>12/9/19</b>	<b>15/7/19</b>	Parameter	INQW S	STD B	Actual	Actual	1 PH	5-9	6.5-9	7.1	6.5	2 BOD	<100	200	0.2	3.8	3 COD	<12	50	<15	29	4 S Solids	<300	100	<2	48	5 Dissolved oxygen	<5.0	-	-	-	6 A Nitrogen	<2.7	1.5	0.04	0.08	7 Phosphorous	-	-	0.6	1.4	8 E-coli	-	ND	ND in 100 ml	ND in 100 ml	Total coliform		ND	ND in 100 ml	ND in 100 ml	<p>Complied</p>
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Layang Estate water analysis (tested in Dynakey Laboratories Sdn Bhd after treatment results 06/9/19 as extracted on random basis are provided below;

<b>Layang Estate -06/9/19</b>				
	Parameter	INQW S	STD B	Actual
1	PH	5-9	6.5-9	6.9
2	BOD	<100	200	0.2
3	COD	<12	50	<15
4	S Solids	<300	100	<2
5	Dissolved oxygen	<5.0	-	-
6	A Nitrogen	<2.7	1.5	ND
7	Phosphorous	-	-	ND
8	E-coli	-	ND	ND in 100 ml
9	Total coliform		ND	ND in 100 ml

Both estates had samples taken for the flowing river /streams within the estates vicinity. Samples are taken every 6 monthly. Results dated 17/9/19 *Sg Ulu Tenegang* as provided below;

<b>Tenegang Estate – 17/9/19</b>					
	Parameter	Spec	Pt 4	Pt 5	Pt 6
1	PH	5-6	6.7	7.1	7.1
2	BOD	3-6	10	7	8
3	COD	23-30	199	90	105
4	S Solids	50-150	30	26	51

5	Dissolved O2	3-5	67.6	85.5	88.2
6	A Nitrogen	0.3-0.9	<1	<1	<1
7	WQI	51-76	67	78	75

Layang Estate similarly have water sampling from the raw source with results below

<b>Layang Estate 06/9/19</b>							
	Parameter	Spec	Pt 4		Parameter	Spec	Pt 4
1	PH	5-6	7.1	5	Dissolved O2	3-5	7.15
2	BOD	3-6	0.8	6	A Nitrogen	0.3-0.9	ND
3	COD	23-30	ND	7	WQI	51-76	-
4	S Solids	50-150	ND	-	-	-	-

The mill similarly sends treated water samples for quality monitoring taken every quarter. Results (tested in *Envilab Sdn Bhd*) as shown below;

<b>Tanjung Palm Oil Mill</b>			<b>28/6/19</b>	<b>10/12/18</b>	
	Parameter	INQW S	STD B	Actual	Actual
1	PH	5-9	6.5-9	7.0	7.4
2	BOD	<100	200	ND<0.2	<2
3	COD	<12	50	9	13
4	S Solids	<300	100	<2	ND<4

5	Dissolved oxygen	<5.0	-	-	-
6	A Nitrogen	<2.7	1.5	ND	ND
7	Phosphorous	-	-	ND	ND
8	E-coli	-	ND	ND	ND
9	Total coliform	-	ND	Nil	Nil

The mill also sampled water quality for detection of contamination through sampling at the monsoon drains of 4 points within the vicinity of the mill complex. The water samples are being tested for any chemical presence i.e zinc, manganese, arsenic, boron, phenol, aluminium, and nickel among others. The results shown below are for samples taken on 28/6/19. The frequency at 2 times/year

<b>Tanjung Palm Oil Mill 28/6/19</b>						
	Parameter	Spec	Pt 1	Pt 2	Pt 3	Pt 4
1	PH	5-6	8.1	7.4	7.5	7.0
2	BOD	3-6	2	2	4	2
3	COD	23-30	22	15	36	17
4	S Solids	50-150	120	7	9	100
5	Dissolved O2	3-5	-	-	-	-
6	A Nitrogen	0.3-0.9	ND	ND	ND	ND
7	WQI	51-76	-	-	-	-

The management concludes that the water quality is acceptable and does not create major impact to the water system.

Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (*Management of River Reserve in Genting*

Criterion / Indicator	Assessment Findings	Compliance												
	<p><i>Plantations Bhd and DID guidelines in 2001</i>). The buffer zones established are as following:</p> <table border="1" data-bbox="1048 491 1576 759"> <thead> <tr> <th data-bbox="1055 496 1330 592">River width/meters</th> <th data-bbox="1337 496 1570 592">Buffer zone/meters</th> </tr> </thead> <tbody> <tr> <td data-bbox="1055 596 1330 624">40</td> <td data-bbox="1337 596 1570 624">50</td> </tr> <tr> <td data-bbox="1055 628 1330 655">20 – 40</td> <td data-bbox="1337 628 1570 655">40</td> </tr> <tr> <td data-bbox="1055 660 1330 687">10 – 20</td> <td data-bbox="1337 660 1570 687">20</td> </tr> <tr> <td data-bbox="1055 692 1330 719">5 – 10</td> <td data-bbox="1337 692 1570 719">10</td> </tr> <tr> <td data-bbox="1055 724 1330 751">&lt; 5</td> <td data-bbox="1337 724 1570 751">5</td> </tr> </tbody> </table>	River width/meters	Buffer zone/meters	40	50	20 – 40	40	10 – 20	20	5 – 10	10	< 5	5	
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<p>4.4.3</p> <p>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>	<p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily. Genting Tanjung POM records the effluent monitoring for DOE submission in the '<i>Borang Penyata Suku Tahunan</i>'. Details as follows;</p> <table border="1" data-bbox="1025 587 1765 959"> <thead> <tr> <th></th> <th>Parameter</th> <th>standard</th> <th>23/7/19</th> <th>13/8/19</th> <th>21/9/19</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>5.0-9.0</td> <td>8.40</td> <td>8.00</td> <td>7.60</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>20.00</td> <td>17.00</td> <td>15.00</td> <td>16.00</td> </tr> <tr> <td>3</td> <td>COD</td> <td>-</td> <td>371.00</td> <td>177.00</td> <td>147.00</td> </tr> <tr> <td></td> <td>Total Solids</td> <td>-</td> <td>1014</td> <td>778</td> <td>686</td> </tr> <tr> <td>4</td> <td>S Solids</td> <td>200</td> <td>56.00</td> <td>55.00</td> <td>23.00</td> </tr> <tr> <td>5</td> <td>O&amp;G</td> <td>20</td> <td>6.00</td> <td>6.00</td> <td>6.00</td> </tr> <tr> <td>6</td> <td>A Nitrogen</td> <td>150</td> <td>1.00</td> <td>1.00</td> <td>1.00</td> </tr> <tr> <td>7</td> <td>Total Nitrogen</td> <td>200</td> <td>12.00</td> <td>11.00</td> <td>15.00</td> </tr> </tbody> </table> <p>The Mill license was for land application and the requirement is for the BOD to be less than 20mg/l. Effluent samples are analysed in KL-<i>Kepong (Sabah) Sdn Bhd</i> laboratory.</p>		Parameter	standard	23/7/19	13/8/19	21/9/19	1	PH	5.0-9.0	8.40	8.00	7.60	2	BOD	20.00	17.00	15.00	16.00	3	COD	-	371.00	177.00	147.00		Total Solids	-	1014	778	686	4	S Solids	200	56.00	55.00	23.00	5	O&G	20	6.00	6.00	6.00	6	A Nitrogen	150	1.00	1.00	1.00	7	Total Nitrogen	200	12.00	11.00	15.00	<p>Complied</p>
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4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	<p>Records of water consumption used for FFB processing are maintained. The entire 2019 data is given below.</p> <table border="1"> <thead> <tr> <th>Month /19</th> <th>FFB</th> <th>Water/L</th> <th>Water L/FFB</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>35171</td> <td>37715</td> <td>1.07</td> </tr> <tr> <td>Feb</td> <td>33141</td> <td>33140</td> <td>1.00</td> </tr> <tr> <td>Mac</td> <td>34884</td> <td>34182</td> <td>0.98</td> </tr> <tr> <td>April</td> <td>30100</td> <td>30478</td> <td>1.01</td> </tr> <tr> <td>May</td> <td>29744</td> <td>32234</td> <td>1.08</td> </tr> <tr> <td>June</td> <td>26871</td> <td>29838</td> <td>1.11</td> </tr> <tr> <td>July</td> <td>26680</td> <td>25249</td> <td>0.95</td> </tr> <tr> <td>Aug</td> <td>26892</td> <td>28492</td> <td>1.06</td> </tr> <tr> <td>Sept</td> <td>29382</td> <td>31668</td> <td>1.08</td> </tr> <tr> <td>Oct</td> <td>34181</td> <td>37560</td> <td>1.10</td> </tr> <tr> <td><i>Total</i></td> <td><i>307047</i></td> <td><i>321258</i></td> <td><i>1.04</i></td> </tr> </tbody> </table> <p>Target is 1.35. Remarks are provided for the variation of ratio in the report.</p>	Month /19	FFB	Water/L	Water L/FFB	Jan	35171	37715	1.07	Feb	33141	33140	1.00	Mac	34884	34182	0.98	April	30100	30478	1.01	May	29744	32234	1.08	June	26871	29838	1.11	July	26680	25249	0.95	Aug	26892	28492	1.06	Sept	29382	31668	1.08	Oct	34181	37560	1.10	<i>Total</i>	<i>307047</i>	<i>321258</i>	<i>1.04</i>	Complied
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<p><b>Criterion 4.5:</b>  Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>																																																			

Criterion / Indicator	Assessment Findings	Compliance												
4.5.1 Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	Both estates continued to implement Integrated Pest Management (IPM). The estates continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Oil Palm Manual OPM No 5 – Pest And Diseases The IPM program among others involved the following practices; <ul style="list-style-type: none"> <li>a) Includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma.</li> <li>b) In order to minimize use of pesticides and bagworm control the estates had planted beneficial plants mainly <i>Tunera subulata</i>, <i>cassia cobanensis</i> and <i>Antigonon leptopus</i> with maps indicating areas planted.</li> <li>c) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year. Baiting was continued until bait acceptance fell below 20%. Barn Owl boxes are erected at ratio of 1: 10 ha to 1: 20 ha however the system was proven not viable in Sabah. Layang estate had a trial of Barn Owl Boxes as part of IPM initiative.</li> </ul>	Complied												
4.5.2 Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	Trainings were provided to the employees on the IPM management and procedures. Details as listed below. <table border="1" data-bbox="1084 1027 1818 1161" style="margin: 10px auto;"> <thead> <tr> <th></th> <th>Subject</th> <th>Tenegan g</th> <th>attend ee</th> <th>Layang</th> <th>attend ee</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>IPM management</td> <td>12/9/19</td> <td>13</td> <td>24/10/19</td> <td>18</td> </tr> </tbody> </table> The training among others includes the following; <ul style="list-style-type: none"> <li>a) Control of pest in estates Rhinoceros Beetle RB</li> <li>b) Rhinoceros Beetle census and control measures</li> <li>c) Beneficial plant cultivation and ratio of planting</li> </ul>		Subject	Tenegan g	attend ee	Layang	attend ee	1	IPM management	12/9/19	13	24/10/19	18	Complied
	Subject	Tenegan g	attend ee	Layang	attend ee									
1	IPM management	12/9/19	13	24/10/19	18									

Criterion / Indicator	Assessment Findings	Compliance																																				
<b>Criterion 4.6:</b> Pesticides are used in ways that do not endanger health or the environment																																						
4.6.1	<p>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.</p> <p>- Major compliance -</p> <p>All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II class III &amp; class IV pesticides.</p> <p>a) No illegal agrochemicals (stated by local and international laws) paraquat was used in their estates.</p> <p>b) The usage of the agrochemicals was based on the <i>Sustainability Management Procedure doc no SMP-GPB-28 titled Justification Of Pesticides Used</i> revised on 17/3/15. SOP and in the Pictorial Safety Standard Book where written justifications had been provided for various fields operations.</p> <p>The Manual has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs. The chemicals used in the estates among others as shown below;</p> <table border="1" data-bbox="1037 914 1682 1246"> <thead> <tr> <th></th> <th>Product Name</th> <th>Name of chemical</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Ally</td> <td>Ally-metsulfuron methyl</td> <td>IV</td> </tr> <tr> <td>2</td> <td>Kenily</td> <td>Kenily 20 WG</td> <td>IV</td> </tr> <tr> <td>3</td> <td>Supremo</td> <td>Glyphosate</td> <td>III</td> </tr> <tr> <td>4</td> <td>Ken Amine</td> <td>2,4D dimethylammonium</td> <td>II</td> </tr> <tr> <td>5</td> <td>Monex</td> <td>MSMA</td> <td>III</td> </tr> <tr> <td>6</td> <td>Blendo</td> <td>Blendo</td> <td>IV</td> </tr> <tr> <td>7</td> <td>Rogor</td> <td>Rogor L-40</td> <td>III</td> </tr> <tr> <td>8</td> <td>Basta</td> <td>Glufosinate ammonium</td> <td>III</td> </tr> </tbody> </table>		Product Name	Name of chemical	Class	1	Ally	Ally-metsulfuron methyl	IV	2	Kenily	Kenily 20 WG	IV	3	Supremo	Glyphosate	III	4	Ken Amine	2,4D dimethylammonium	II	5	Monex	MSMA	III	6	Blendo	Blendo	IV	7	Rogor	Rogor L-40	III	8	Basta	Glufosinate ammonium	III	<p>Complied</p>
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7	Rogor	Rogor L-40	III																																			
8	Basta	Glufosinate ammonium	III																																			

<p>4.6.2</p>	<p>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 -</p>	<p>Both the estates had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available and verified. All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II, class III &amp; class IV pesticides. No illegal agrochemicals (stated by local and international laws) in particular <i>paraquat</i> were used in their estates. The usage of pesticides has been summarised below;</p> <table border="1" data-bbox="1088 751 1744 1051"> <thead> <tr> <th colspan="2">Layang Estate</th> <th>2017</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Total pesticides /mt FFB</td> <td>0.078</td> <td>0.083</td> <td>0.069</td> </tr> <tr> <td>2</td> <td>Total pesticides /ha</td> <td>1.438</td> <td>1.485</td> <td>1.081</td> </tr> <tr> <th colspan="2">Tenegang Estate</th> <th>2017</th> <th>2018</th> <th>2019</th> </tr> <tr> <td>1</td> <td>Total pesticides /mt FFB</td> <td>0.062</td> <td>0.088</td> <td>0.954</td> </tr> <tr> <td>2</td> <td>Total pesticides /ha</td> <td>1.317</td> <td>1.893</td> <td>1.173</td> </tr> </tbody> </table> <p>Variation of the chemical usage is attributed to the following factors among others;</p> <ol style="list-style-type: none"> <li>Immature fields following a replanting program requiring monthly weeding</li> <li>Rain pattern with flooding areas affecting the spraying program for the field maintenance.</li> <li>Changes in work method inter pump of 16 L to 12 L capacity and sizes of volume.</li> <li>Regeneration interval differences of weeds in certain fields.</li> </ol>	Layang Estate		2017	2018	2019	1	Total pesticides /mt FFB	0.078	0.083	0.069	2	Total pesticides /ha	1.438	1.485	1.081	Tenegang Estate		2017	2018	2019	1	Total pesticides /mt FFB	0.062	0.088	0.954	2	Total pesticides /ha	1.317	1.893	1.173	<p>Complied</p>
Layang Estate		2017	2018	2019																													
1	Total pesticides /mt FFB	0.078	0.083	0.069																													
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Criterion / Indicator	Assessment Findings	Compliance
<p>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 -</p>	<p>Both Tenegang and Layang estates are committed to minimize the usage of agrochemicals through the implementation of IPM practices among others;</p> <ul style="list-style-type: none"> <li>a) The planting of beneficial plants i.e. <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i>.</li> <li>b) Blanket spraying was not practiced by this CU and soft grasses maintained in the field. It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the GENP Oil Palm Manual OPM No 6. Weeding Management</li> <li>c) No prophylactic use of such pesticides is permitted.</li> <li>d) Use of alternative pesticides that are less toxic and safer i.e. <i>basta</i> and <i>glyphosate</i></li> </ul>	<p>Complied</p>
<p>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 -</p>	<p>The estate confined usage of pesticides which were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.</p> <ul style="list-style-type: none"> <li>a) The review of the chemical register concluded that all pesticides used were of class II, III &amp; class IV. The use of paraquat had been prohibited in all GPSB estates.</li> <li>b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used.</li> </ul> <p>Sighted from records and interviews with workers, staff and estate assistants, concluded that trainings were held with all precautions being taken and all legal requirements are met.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<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>Pesticides were handled, used or applied by trained workers applied in accordance with the product label. Latest training for pesticides handler was conducted as follow:</p> <p><u>Genting Tenegang Estate:</u>                      a) SOP &amp; Policy Training for Chemical Store Keeper dated 3/8/19                      b) Training for Chemical Sprayers dated 5/7/19                      c) Training on Manuring process dated 15/5/19</p> <p><u>Genting Layang Estate:</u>                      a) Pesticide Handling Training for Sprayers dated 13/3/19                      b) Manuring SOP, PPE SOP for Manuring Workers dated 26/4/19                      c) Pesticide Handling, SOP and SDS Training for Chemical Store Keeper dated 24/5/19</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>During the audit, it was noted that the 2 estates and the mill had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions.</p> <p>a) Paraquat usage has been prohibited in all units and the entirety of the organization.                      b) The Safety Procedures for pesticides application were well described in Pictorial Safety Standard.</p> <p>The training included the safety aspects and usage of PPE when handling with pesticides. Record of training in relation to pesticides handlings as provided in 6.6.5 above.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
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 -	Aerial application of agrochemicals is not practiced in CU. This is confirmed through observation during the site visit, estate complex and interview with the employees.  Complied
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	No associated smallholders at Genting Tenegang estate & Genting Layang Estate. Employees demonstrate knowledge and skills on pesticide handling. MSDS/SDS was displayed in local Bahasa Malaysia language at the agrochemical store for each chemical stored as well as the use of safety pictorial poster for the easy understanding of the agrochemical handlers.  Complied
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 -	Proper disposal of waste material was carried out as per the company procedures. The procedures are fully understood by workers and managers. Workers interview reveal that they are aware of the zero burning policy including domestic waste are not allowed to be burned. Management disposes waste material as per regulation for schedule waste and domestic waste. E.g. at POM, training for waste recycle handling done on 5/10/19 for workers and managers.  Complied



Criterion / Indicator		Assessment Findings	Compliance
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	<p><u>Genting Tenegang Estate:</u> Annual medical surveillance for sprayers and pesticide operators were demonstrated adequately. Annual medical surveillance was conducted by Klinik Elopura Sdn Bhd. Medical examination programme established for sprayers and pesticide handlers. Sampled the result for 22 workers dated 19/10/19 &amp; result of the medical surveillance report found to be that 21 workers fit for work with 1 worker not fit to work. The unfit worker has been relocated to general works activities with the estate aware of medical health follow up to be made accordingly.</p> <p><u>Genting Layang Estate:</u> Annual medical surveillance for sprayers and pesticide operators were demonstrated adequately. Annual medical surveillance was conducted by Klinik Elopura Sdn Bhd. Medical examination programme established for sprayers and pesticide handlers. Sampled the result for 24 workers dated 13/02/19 &amp; result of the medical surveillance report found to be that all 24 workers fit for work.</p>	Complied
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	The monthly check-up including pregnancy test was conducted by HA. Sampled the monthly test report for Oct-19 at Genting Tenegang Estate & Genting Layang Estate. No pregnant women or breastfeeding women noticed working with pesticide handling activities.	Complied
<p><b>Criterion 4.7:</b> An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:</p>			

<p>4.7.1</p>	<p>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 -</p>	<p>The Occupational Safety and Health Policy was established, signed by President &amp; Chief Operating Officer on 1/07/2018. The communication between employer and employees can be seen through briefing during morning muster and displayed the policy on the notice board. The safety and health management plan 2018 was established and prepared by Mill Engineer and approved by Mill Manager. All the activities were included in this Safety and Health Management plan. Seen the OSH Policy communication record to workers and employees dated 12/10/19 at Genting Tenegang Estate, 12/7/19 at Genting Layang Estate and 2/1/19 at Genting Tanjung POM.</p> <p><u>Chemical Health Risk Assessment (CHRA)</u> Genting Tenegang Estate &amp; Genting Layang Estate - Latest CHRA conducted on 26/3/2019 by registered assessor from QMSPRO Sdn Bhd – Registration No. JKPP HQ/03/ASS/00/154. The CHRA report is still pending issuance from the assessor and the estates was following up closely on the status issuance of the CHRA assessment report.</p> <p>At Genting Tanjung POM, CHRA was conducted on 11/5/2015 by Competent Person #JKKPHIE 127/171-2(160)) from ENVOSHA Sdn Bhd. Relevant work units were assessed and related recommendation report under from F of the report. All necessary action has been progressively implemented based on recommendation by assessor.</p> <p><u>Medical Surveillance Programme</u> Annual medical surveillance was last carried out on 13/10/19 with DAB OH Sdn Bhd, OHD Reg. No. HQ/18/DOC/00/00201 for 5 workers exposed to Hexane. Overall medical surveillance report indicates that all 5 workers were fit to work.</p> <p><u>Annual Audiometric Testing</u></p>	<p>Complied</p>
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	Annual audiometric testing was carried out on 2/10/2019 by DAB OH Sdn Bhd, OHD Registration No. HQ/10/DOC/00/167. Seen the summary audiometric report with total 25 total worker tested with all workers having normal hearing result.	

<p>4.7.2</p>	<p>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 -</p>	<p>Genting Tanjung Production Unit had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. Appropriate control measure has been determined and revised in the HIRARC register.</p> <p>Genting Tanjung POM - HIRARC was reviewed whenever there is a change in process, or accident. The latest HIRARC review was done on 1/06/2019 and approved by the Mill Manager. The HIRARC for Mill activities was identified and risk assessed with respect to e.g. office, FFB grading, FFB loading ramp, Crane Station, Marshalling Yard, Press Station, Oil Room, Boiler Plant, Engine Room, Empty Bunch Hopper, Incinerator, Water Treatment Plant, Laboratory, Effluent Treatment Plant, CPO &amp; PK Despatch, Confine Space, Workshop, EFB Plant.</p> <p>At the Genting Tenegang Estate &amp; Genting Layang Estate, among the HIRARC carried out covered activities like chemical mixing, replanting, spraying, manuring, chemical/ fertilizer/ POL storage, harvesting and FFB collection, pruning, nursery, FFB Transport, working at height, and workshop. The latest review was done on 25/1/19 (annual review) at Genting Tenegang Estate &amp; Genting Layang Estate. The hazard identification, risk rating and risk control review measures details in certain HIRARC operations was not adequately addressed.</p> <p><u>Genting Tenegang Estate:</u> There was an (MC&gt;4 days) JKKP 6 incident dated 21/7/19 on the (Harvesting - cutting of palm fronds. However, the HIRARC for the related activity was not reviewed.</p> <p><u>Genting Layang Estate:</u> a) 1 accident case reported with MC 2 days on 10/9/19. The accident investigation been conducted and HIRARC for the related accident activity</p>	<p>Major nonconformance</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>- Bodily injury due to Grass Cutting Knife been reviewed on 1/11/19. However, the HIRARC review was not fully addressed as the review on Likelihood rating as not adequately reviewed as per the risk rating matrix. Note: Currently rated: (Likelihood x severity) – (1x2) – 1 is very unlikely.</p> <p>b) HIRARC for Landfill operation was not available.</p> <p>c) Modification works been carried out for the Diesel skid tank operation on the working at height. However, the HIRARC for Diesel operation did not capture on the working at height activity.</p> <p>Thus, a Major NC been raised.</p>	

<p>4.7.3</p>	<p>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 -</p>	<p>Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE.</p> <p>Suitable PPE has been provided to the workers based on the information in the SDS and CHRA assessor’s recommendation.</p> <p>List of Personal Protective Equipment (PPE) Provided – identifies the type of PPE for the respective activities.</p> <p>a. Melewar POM: Boiler/Engine operator – Safety Helmet, Semi leather Hand Glove, Cotton Gloves, Safety Shoes, Safety Vest and Ear Muff. Sampled PPE issuance record dated 22/08/19 for Safety Helmet – Boilerman, 1/11/19 – Press Operator, 11/11/19 – Engine Room Operator, and 26/5/19 – Engine Room Operator.</p> <p>b. Genting Tenegang Estate: Field workers (sprayer, manure &amp; harvester) – N95 respirator, anti-mist goggles, wellington boots, apron and sickle cover. Sampled PPE issuance record dated 6/11/19 – Safety Boot (Sprayer), 2/2/19 - Safety Goggle (Sprayer) and 13/8/19 – Face Mask (Sprayer).</p> <p>c. Genting Layang Estate: Field workers (sprayer, manure &amp; harvester) – N95 respirator, anti-mist goggles, wellington boots, apron and sickle cover. Sampled PPE issuance record – Apron (Manurer) dated 22/1/19, Latex Rubber Glove (Manurer) dated 26/2/19, Face Mask (Manurer) dated 17/5/19, Goggle (Manurer) dated 26/2/19 and Respirator Filter (Sprayer) dated 11/11/19.</p> <p>Verified that the mill &amp; estates chemical store was found to be adequately organized, properly labelled, secured and person in charge understands the OSH procedures. Safety Date Sheet was placed at the chemical stores and is available. The person in charge understands the information written in Safety Data Sheet.</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
<p>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 -</p>	<p>The OSH policy is well briefed to all workers. Interview with workers reveal that they understand the policy and the importance of safety at work.  <u>Genting Tenegang Estate:</u>                      OSH meeting conducted on quarterly basis. The OSH meeting minutes available and seen the meeting minutes conducted on 15/04/19, 22/07/19 &amp; 24/10/19 has been adequately covered.  <u>Genting Layang Estate:</u>                      OSH meeting conducted on quarterly basis. The OSH meeting conducted on 3/09/19, 21/6/19 &amp; 22/03/19 and the meeting has been adequately covered. Verified that the OSH Committee Members chart and the appointment has been issued accordingly.  <u>Genting Tanjung POM:</u>                      OSH meeting conducted on quarterly basis. The OSH meeting conducted on 20/09/19, 20/06/19 &amp; 23/03/2019 and the meeting has been adequately covered. Verified that the OSH Committee Members chart and the appointment letters has been issued accordingly.</p>	<p>Complied</p>

<p>4.7.5</p>	<p>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 -</p>	<p>Accident and emergency procedures have been communicated to employees, contractors and visitors.</p> <ol style="list-style-type: none"> <li>1. Genting Tenegang Estate: Fire evacuation drill was last conducted on 11/07/2019 to test the state of readiness during emergency situation.</li> <li>2. Genting Layang Estate: Fire evacuation drill was last conducted on 8/03/2019 to test the state of readiness during emergency situation.</li> <li>3. Genting Tanjung POM: Fire evacuation drill was last conducted on 07/05/2019 to test the state of readiness during emergency situation.</li> </ol> <p>Accident and emergency procedures are in Bahasa Malaysia and this is understood by the responsible workers, staff or executives involved in the operation. Good understanding level observed among the workers.</p> <ol style="list-style-type: none"> <li>1. Training for First Aid is conducted in annually. Sufficient first aiders been trained. First Aid Training at Genting Tenegang Estate was conducted on 22/07/19. At Genting Layang Estate : the first aid training was conducted on 8/03/19. As for the Genting Tanjung POM, the First Aid Training was conducted on 26/10/19.</li> <li>2. First aid equipment is available at worksites. During the site visit there is evident that First Aid Box is available at the relevant area with sufficient contents and in good condition.</li> <li>3. Fire extinguisher (ABC Powder) assessed during the site observation are available and within the expiry date.</li> <li>4. Portable emergency eye wash &amp; shower facility available at chemical store, workshop, mixing area and laboratory and are in good working condition.</li> </ol>	<p>Minor nonconformance</p>
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		<p><u>Genting Tanjung POM:</u> As to date no accident cases reported for year 2019. JKKP 8 was sent to DOSH accordingly on 19/01/2019. DOSH visit been recorded in the DOSH log book. Seen the latest DOSH visit recorded dated 7/10/19 on the PMT renewal inspection process.</p> <p><u>Genting Tenegang Estate:</u> 1 cases reported with JKKP 6 submission for year 2019. Seen the JKKP 6 submission report dated 21/7/19. Verified that the Incident Investigation Report been raised according. JKKP 8 was sent to DOSH accordingly on 5/01/2019. Seen the Annual JKKP 8 submission reference: JKKP 8/21255/2018. DOSH visit been recorded in the DOSH log book. Seen the latest DOSH visit recorded dated 4/11/19 on the Air compressor PMT approval.</p> <p><u>Genting Layang Estate:</u> So far no cases reported with JKKP 6 submission for year 2019. 1 accident case reported on 10/9/19 with the accident investigation report been raised. Annual JKKP 8 was sent to DOSH accordingly on 4/01/2019. Seen the JKKP 8 submission reference: JKKP 8/8364/2018. DOSH visit been recorded in the DOSH log book. Seen the latest DOSH visit recorded dated 5/08/19 on the Air compressor SB PMT 10427 approval.</p> <p>First aid case investigation process was not adequately addressed according to internal procedure requirements.</p> <p><u>Genting Tanjung POM:</u> Admin Office First Aid Kit - First Aid cases dated 4/7/19, 17/7/19, 14/8/19, 21/8/19, 24/8/19 and 28/10/19 were recorded in the sampled First Aid Log Book at Admin Office. However, the review of first aid injury cases was not investigated and reviewed accordingly in the OSH Meeting dated 20/9/19 as per internal procedure NADOPOD (SP-MGR-06) requirement.</p>	
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Criterion / Indicator	Assessment Findings	Compliance
	<p>Genting Tenegang Estate:            There were (MC&lt;4) 4 first aid cases (minor cut due to sharpening the sickle) in June 2019. However, no Accident Investigation Report was conducted as per internal procedure "Carta 1- Pemberitahuan mengenai Kemalangan dan Penyiasatan di Tempat Kerja" requirement.</p> <p>Genting Layang Estate:            Chemical Storekeeper first aid kit: - Monthly first aid kit inspection record e.g. sampled for July-19 was available with details of refilled of first aid items for used up first aid items. However, the first aid case usage record was not recorded for the used up first aid items.            Thus, a Minor NC been raised.</p>	
4.7.6	<p>All workers shall be provided with medical care, and covered by accident insurance.            - Minor compliance -</p> <p>Medical care and accident insurance is provided to all the employees. Workers are covered under SOCSO scheme. Seen the Sosco scheme payment schedule at mill/estates as follows:            a) Genting Tenegang Estate: Sampled Sosco Jadual Caruman for August 2019, September 2019 and October 2019            b) Genting Layang Estate: Sampled Sosco Jadual Caruman for August 2019, September 2019 and October 2019            c) Genting Tanjung POM: Sampled Sosco Jadual Caruman for August 2019, September 2019 and October 2019            Above Sosco submission were done using the Borang 8A. Details of the Employer and worker's details been available accordingly.</p>	Complied

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4.7.7	<p>Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics</p> <p>- Minor compliance -</p> <p>a) Genting Tenegang Estate:                      JKKP 8 was sent to DOSH accordingly on 5/01/2019. Seen the JKKP 8 submission reference: JKKP 8/21255/2018.</p> <p>b) Genting Layang Estate:                      JKKP 8 was sent to DOSH accordingly on 4/01/2019. Seen the JKKP 8 submission reference: JKKP 8/8364/2018.</p> <p>c) Genting Tanjung POM:                      JKKP 8 was sent to DOSH accordingly on 19/01/19. Seen the JKKP 8 submission reference: JKKP 8/29139/2018.</p>	Complied
<p><b>Criterion 4.8:</b>                      All staff, workers, smallholders and contract workers are appropriately trained.</p>		
4.8.1	<p>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.</p> <p>- Major compliance -</p> <p>Formal training program for the year 2019 available and implemented. Regular assessment of training conducted to ensure understanding among the employees. Trainings conducted include a formal training programme on all aspects of RSPO Principles and Criteria and the Supply Chain Certification System. The various trainings conducted and the training records maintained to be acceptable.</p>	Complied

<p>4.8.2</p>	<p>Records of training for each employee shall be maintained. - Minor compliance -</p>	<p>Records of training for each employee are available in Mill and estates. Sampled as follows:</p> <p><u>Genting Tenegang Estate:</u></p> <ul style="list-style-type: none"> <li>a) Training of Company Policy on Environmental, S&amp;H, Zero Burning, Sexual Harassment dated 12/10/19</li> <li>b) Chemical Handling Training for Store Keeper dated 3/8/19</li> <li>c) Training for Sprayers dated 5/7/19</li> <li>d) First Aid Training dated 22/7/19</li> <li>e) Safety Committee Training dated 4/11/19</li> <li>f) Water Treatment Plant Operating Procedure Training dated 7/6/19</li> <li>g) Workshop Operator Training dated 10/10/19</li> <li>h) Harvesting Training dated 5/7/19</li> </ul> <p><u>Genting Layang Estate:</u></p> <ul style="list-style-type: none"> <li>a) Schedule Waste SOP Training dated 6/11/19</li> <li>b) River Buffer Zone Management Procedure Training dated 10/9/19</li> <li>c) RSPO Briefing, Company Policy Training dated 12/7/19</li> <li>d) PPE, HIRARC &amp; Machinery Safe Work Practice Training dated 26/8/19</li> <li>e) Pesticide Handling, SOP and SDS Training for Chemical Store Keeper dated 24/5/19</li> <li>f) Generator Set Operation Training dated 6/10/19</li> <li>g) ERT &amp; Fire Extinguisher Training dated 10/10/19</li> <li>h) FFB Contractor Briefing on FFB, RSPO, MSPO &amp; ISCC</li> <li>i) PPE &amp; Harvesting SOP Training dated 22/8/19</li> <li>j) Fire Drill Training dated 8/3/19</li> <li>k) First Aid Training dated 8/3/19</li> <li>l) Pesticide Handling Training for Sprayers dated 13/3/19</li> <li>m) Manuring SOP, PPE SOP for Manuring Workers dated 26/4/19</li> </ul> <p><u>Genting Tanjung POM:</u></p> <ul style="list-style-type: none"> <li>a) Fire Extinguisher Training dated 16/11/19</li> </ul>	<p>Complied</p>
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	b) Waste Recycle Training dated 5/10/19 c) First Aid Training dated 26/10/19 d) Boiler Chemical Training dated 10/7/19 e) Chemical Handling Training dated 11/7/19 f) Schedule Waste Training dated 24/10/19 g) Lockout Tagout & Permit to Work/HIRARC & Aspect Impact Training dated 22/7/19 h) Welding Technique & Use Oxy Acetylene Training dated 19/10/19 i) Vehicle Handling & precaution Training dated 23/7/19 j) Fire Drill Training dated 7/5/19 k) Training on All Company Policy & Sub Policy dated 2/1/19 i) Chemical Drill Training dated 7/5/19	
<p><b>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</b></p>		
<p><b>Criterion 5.1:</b> 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.</p>		

Criterion / Indicator	Assessment Findings	Compliance
<p>5.1.1 An environmental impact assessment (EIA) shall be documented.                      - Major compliance -</p>	<p>POM and Estates carried out the annual review of environmental impacts in term of Environmental Impact Evaluation. The last review was conducted in 1/6/19 at POM on water quality and water availability, contamination of oil and water and air pollution. The assessment covered all area and process in the mill such as FFB reception, loading ramp &amp; marshalling yard, sterilizer, threshing, pressing, clarification station, kernel plant and etc.</p> <p><u>Genting Layang Estate:</u>                      List of Identification of Environmental Aspect and Impact and Evaluation of Significance available dated 16/10/19. Sampled the Environmental Aspect and Impact Identification (EAI) for activities such as Herbicides Spraying, Manuring, Harvesting/Pruning, Chemical (herbicides/fertilizer) receiving and storage, Building Construction.</p> <p><u>Genting Tenegang Estate:</u>                      List of Identification of Environmental Aspect and Impact and Evaluation of Significance available. Sampled the Environmental Aspect and Impact Identification (EAI) for activities such as Herbicides Spraying, Manuring, Harvesting/Pruning, Chemical (herbicides/fertilizer) receiving and storage, Building Construction, Management of Housing and Other Amenities.</p>	<p>Complied</p>
<p>5.1.2 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.                      - Minor compliance -</p>	<p>The continuous implementation of the improvements activities was checked during the field and document audit. The environmental management plan has been established to monitor the identified significant activities that give impacts on environment. A specific staff and executive have been appointed to do the monitoring to ensure the plan is effectively implemented.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>5.1.3 This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p>	<p>An environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. Continuous awareness training programme has been carried out by the company to its workers and other stakeholders. Monitoring plan was established based on DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD, stack monitoring and boiler stack sampling.</p> <p>Sampled at Genting Tanjung POM for the Stack emission monitoring report# MS/GTOM/2019/Boiler No.3 (S3) -1st Half date 28/05/19, Verified the average Dust Emission Load (average Particulate, PM) for Boiler No.3 (S3) was within permissible limit of 400.0mg/Nm<sup>3</sup> corrected at 12% CO<sub>2</sub>.</p>	<p>Complied</p>
<p><b>Criterion 5.2:</b> 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>		

Criterion / Indicator	Assessment Findings	Compliance																
<p>5.2.1</p>	<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). - Major compliance -</p>	<p>The CU had re-assessed to collate information relating to HCV. The assessment contained information of both planted area and relevant wider landscape-level, and result HCV identified. The inventory of the HCV sites was conducted in FY2010 by Dr Yap Son Kheong which covered all the Sabah region estates of Genting Plantations. Based on the findings of the assessment, the management and monitoring plan for HCV areas report dated 10th October 2014; High Conservation Value (HCV) areas have been identified such as forested area, river buffer zone, steep terrain, wildlife sanctuary in Genting Tenegang Group Estate. The following aspects areas were assessed as to their state and management.</p> <ul style="list-style-type: none"> <li>a) Area of HCV-Shared management of forest reserve and boundary areas/buffer zones</li> <li>b) The presence of large mammals and birds and how they are protected from poaches.</li> <li>c) IPM: use of plants to attract <i>parasitoids</i> to control bagworms &amp; barn owls for rats management and success</li> <li>d) Drainage and the conditions. Determining the presence of fishes as a bio-indicator of water health</li> </ul> <p>The breakdown of the HCV classes identified in the estate at various sites is given below;</p> <table border="1" data-bbox="1048 1075 1615 1177"> <thead> <tr> <th></th> <th>Estate</th> <th>HCV 1</th> <th>HCV 4</th> <th>HCV 6</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tenegang</td> <td></td> <td>4</td> <td>-</td> </tr> <tr> <td>2</td> <td>Layang</td> <td>-</td> <td>4</td> <td>-</td> </tr> </tbody> </table> <p>The HCV assessment for both the estates was made by an appointed qualified assessor titled Inventory On HCV sited in Oct 2009 –July 2010. The report was sighted and verified.</p>		Estate	HCV 1	HCV 4	HCV 6	1	Tenegang		4	-	2	Layang	-	4	-	<p>Complied</p>
	Estate	HCV 1	HCV 4	HCV 6														
1	Tenegang		4	-														
2	Layang	-	4	-														



5.2.2	<p>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 -</p>	<p>The RTE assessment was incorporated in the HCV report and evaluation. Therein providing wildlife database categories of;</p> <ul style="list-style-type: none"> <li>a) Birds / Mammals</li> <li>b) <i>Herpetofauna</i> / Conservation status</li> <li>c) List of offences and penalties under Wildlife Conservation Act 2010.</li> <li>d) Provocation of wildlife.</li> </ul> <p>In records there is no RTE species observed/spotted within the member estates in CU. Relevant action plans had been established and implemented concerning protection of the riparian, such as identification on map and ground, restriction of no chemicals activities, awareness training to workers and patrolling by Auxiliary Police          Both the estates reviewed the HCV management plan annually in 13/8/19.</p> <table border="1" data-bbox="976 847 1823 1364"> <thead> <tr> <th></th> <th>HCV area</th> <th>Management &amp; Monitoring</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Protected areas</td> <td>Boundary markers estate/forest reserve Signage on no illegal hunting/collecting &amp; no authorised entry</td> </tr> <tr> <td>2</td> <td>RTE</td> <td>Patrol the boundary area Inform all stakeholders on HCV assessment and protection Education &amp; awareness for workers Ensure no agrochemicals activities at bordering water bodies</td> </tr> <tr> <td>3</td> <td>Sacred sites</td> <td>Clear demarcation and proper fencing at identified HCV Inform community concerning utilisation of site To maintain cleanliness / upkeep of areas</td> </tr> </tbody> </table>		HCV area	Management & Monitoring	1	Protected areas	Boundary markers estate/forest reserve Signage on no illegal hunting/collecting & no authorised entry	2	RTE	Patrol the boundary area Inform all stakeholders on HCV assessment and protection Education & awareness for workers Ensure no agrochemicals activities at bordering water bodies	3	Sacred sites	Clear demarcation and proper fencing at identified HCV Inform community concerning utilisation of site To maintain cleanliness / upkeep of areas	Complied
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Criterion / Indicator		Assessment Findings		Compliance
			<p>Maintain a buffer in order to secure the ares from fire and other disturbances To include areas in HCV map</p>	
		4	<p>Ecosystem</p> <p>Place clear boundary markers between estate and forest reserve. Place signage on no illegal activities Patrol boundary areas within forest reserve regularly Socialise the HCV assessment consisting of identification management and monitoring to all employees Information to stakeholders on the HCV</p>	

Criterion / Indicator	Assessment Findings	Compliance												
<p>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.</p> <p>- Minor compliance -</p>	<p>There were programs held by the estates /mill to all employees in pertaining to the awareness of HCV areas and RTE species. Interview with the employees concluded that training and briefing made during the ad hoc session and morning muster. This is also emphasized during the training held by the Sustainability Unit programs. Employees are aware of the following reminders;</p> <ul style="list-style-type: none"> <li>a) An offence to capture, harm, kills any wildlife.</li> <li>b) Disciplinary measures shall be taken if found violating company rules.</li> <li>c) Riparian buffer zone to be free from any chemicals application/pollution</li> <li>d) Relevant signs <i>NO HUNTING NO FELLING ALLOWED</i></li> </ul> <p>Training in relation to the HCV management is shown below;</p> <table border="1" data-bbox="969 831 1805 963"> <thead> <tr> <th></th> <th>Subject</th> <th>Tenega ng</th> <th>attend ee</th> <th>Layang</th> <th>attende e</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Riparian Zone Protection</td> <td>09/7/19</td> <td>8</td> <td>10/9/19</td> <td>13</td> </tr> </tbody> </table>		Subject	Tenega ng	attend ee	Layang	attende e	1	Riparian Zone Protection	09/7/19	8	10/9/19	13	<p>Complied</p>
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<p>5.2.4 Where a management plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> <li>• The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>• Outcomes of monitoring shall be fed back into the management plan.</li> </ul> <p>- Minor compliance -</p>	<p>The CU observed implemented the established action plans, including monitoring (patrolling) of the conservation areas by Auxiliary Police. Record of monitoring (patrolling) observed maintained. Observed that there is no monitoring outcomes that requires changed of practices or action plan</p>	<p>Complied</p>												

Criterion / Indicator		Assessment Findings	Compliance
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 -	There is no HCV set-asides with existing rights of local communities were observed.	Complied
<b>Criterion 5.3:</b> Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			

Criterion / Indicator	Assessment Findings	Compliance
<p>5.3.1 All waste products and sources of pollution shall be identified and documented.                      - Major compliance -</p>	<p>Visits made to Mill together with Genting Tenegang Estate, Genting Layang Estate showed that all waste products and sources of pollution were identified and documented. The documentation and identification of all the waste products such as scheduled waste, domestic waste and recyclable waste such as metal, plastic, mill waste and polluting materials e.g. EFB, POME, Stack emissions and Boiler ashes were maintained and monitored at the Mill. At the estates Scheduled Waste identified included spent hydraulic oil (SW 305), spent lubricant oil (SW306), used chemical containers/drums (SW 409), used battery (SW102), clinical waste SW404 and used filters SW 410). Records on the usage and disposal e.g. inventory and consignment notes were recorded and documented.</p> <p>Sampled seen 6<sup>th</sup> schedule consignment note#B005318, SW 305 dated 26/06/19 at Genting Tenegang Estate, consignment note no. 2019092412H7SOPG dated 24/9/19 for SW 404, consignment note no. B0053007 dated 26/6/19 for SW 305 at Genting Layang Estate.</p> <p>At the Genting Tanjung POM sampled 6<sup>th</sup> schedule consignment note#2019063018YNU4C7 for SW 305 dated 30/6/19, consignment note#2019063018FYMXN for SW 409 dated 30/6/19 and consignment note#2019070917TZ0M26 for SW 410 dated 9/7/19.</p> <p>Disposal of Used Lubricant Oil (SW305), Used Oil Filter (SW410), Contaminated Container (SW409) were done using Legenda Bumimas Sdn Bhd whereas Clinical Waste Disposal done using Sedafiat Sdn Bhd. Appropriate secondary containment with necessary spill kits for the diesel skid tanks, chemical and scheduled waste storage areas was adequately maintained.</p> <p>Verified that the 5<sup>th</sup> Schedule Monthly Inventory been maintained accordingly at the mill and estates with latest inventory record of October 2019.</p>	<p>Complied</p>

<b>Criterion / Indicator</b>	<b>Assessment Findings</b>	<b>Compliance</b>
5.3.2 All chemicals and their containers shall be disposed of responsibly. - Major compliance -	The disposal of used chemicals and containers were done in accordance with their schedule on waste management as planned. Stores for scheduled waste were inspected at audited sites i.e. Mill and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. The mill and estates also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor by Legenda Bumimas Sdn. Bhd and Sedafiat Sdn Bhd (for clinical waste).	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.                      - Minor compliance -</p>	<p>Segregation of wastes i.e. general wastes and scheduled wastes including clinical waste was verified in the mill/estates.</p> <p>Proper storage areas were identified for the storage of the recyclable wastes at the estates and mill with adequate pollution control methods been implemented e.g. disposal of non-scheduled waste (empty chemical container). Environmental Improvement Plan/Pollution Prevention Plan for year 2019 been established accordingly e.g. for Leaking of pesticide during chemical mixing and washing and leaking of lubricant/oil from servicing/parking tractor.</p> <p>However, visit to Genting Layang Estate found that the waste management and disposal plan to avoid or reduce pollution was not adequately documented and implemented. This was based on the evidence that waste generated from demolished buildings (Old Labour Quarters - LQ1) debris which was found not managed properly within housing compound area of GLYE in front of LQ2. Hence, a Minor non-conformance has been raised on the matter.</p>	<p>Minor nonconformance</p>
<p><b>Criterion 5.4:</b>                      Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		

<p>5.4.1</p>	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the following;</p> <ul style="list-style-type: none"> <li>a) Environmental Aspect and Impact Assessment Register for 2019 latest revision dated May 2019.</li> <li>b) Diesel usage efficiency and optimisation renewable energy dated 31/1/19</li> </ul> <p>Diesel usage efficiency and optimisation renewable energy</p> <table border="1" data-bbox="976 651 1774 1088"> <thead> <tr> <th colspan="3"><b><i>Genting Tanjung Palm Oil Mill</i></b></th> </tr> <tr> <th></th> <th>Concern</th> <th>Management Plan</th> </tr> </thead> <tbody> <tr> <td rowspan="4">1</td> <td rowspan="4">Diesel usage</td> <td>Shut off engine if &gt; 3 min</td> </tr> <tr> <td>Maintain operating 6 presses out of 9 units.</td> </tr> <tr> <td>Future plan to apply SESB in replace of gen-set</td> </tr> <tr> <td>Scheduled inspection of boiler</td> </tr> <tr> <td rowspan="2">2</td> <td rowspan="2">GHG emission</td> <td>Min gen-set running</td> </tr> <tr> <td>Regular checking of vehicle</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">Diesel use/year</td> <td>Have target consumption /year</td> </tr> <tr> <td>Change gen-set to TNB during non processing hours</td> </tr> </tbody> </table> <table border="1" data-bbox="976 1120 1774 1383"> <thead> <tr> <th colspan="3"><b><i>Tenang / Layang Estates</i></b></th> </tr> <tr> <th></th> <th>Concern</th> <th>Management Plan</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1</td> <td rowspan="2">Diesel usage</td> <td>to carry out scheduled maintenance for machineries to unsure diesel and lubricant usage is at optimal level and in good condition.</td> </tr> <tr> <td>to brief workers during muster briefing on how to reduce diesel usage.</td> </tr> </tbody> </table>	<b><i>Genting Tanjung Palm Oil Mill</i></b>				Concern	Management Plan	1	Diesel usage	Shut off engine if > 3 min	Maintain operating 6 presses out of 9 units.	Future plan to apply SESB in replace of gen-set	Scheduled inspection of boiler	2	GHG emission	Min gen-set running	Regular checking of vehicle	3	Diesel use/year	Have target consumption /year	Change gen-set to TNB during non processing hours	<b><i>Tenang / Layang Estates</i></b>				Concern	Management Plan	1	Diesel usage	to carry out scheduled maintenance for machineries to unsure diesel and lubricant usage is at optimal level and in good condition.	to brief workers during muster briefing on how to reduce diesel usage.	<p>Complied</p>
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		2	<p>Skid tank management:</p> <p>to ensure all equipment for loading and unloading diesel in good condition.</p> <p>to ensure no spillage and leakage</p> <p>to ensure nozzle is always locked when not in used to avoid unauthorized diesel filling.</p>																																																					
<table border="1"> <thead> <tr> <th colspan="4"><b>Genting Tanjung Palm Oil Mill</b></th> </tr> <tr> <th>Month 2019</th> <th>FFB / mt</th> <th>Diesel /L</th> <th>Diesel /FFB</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>35171</td> <td>16304</td> <td>0.46</td> </tr> <tr> <td>Feb</td> <td>33141</td> <td>15368</td> <td>0.46</td> </tr> <tr> <td>Mac</td> <td>34884</td> <td>13219</td> <td>0.38</td> </tr> <tr> <td>April</td> <td>30100</td> <td>12806</td> <td>0.43</td> </tr> <tr> <td>May</td> <td>29744</td> <td>17660</td> <td>0.59</td> </tr> <tr> <td>June</td> <td>26871</td> <td>20641</td> <td>0.77</td> </tr> <tr> <td>July</td> <td>26680</td> <td>14738</td> <td>0.55</td> </tr> <tr> <td>Aug</td> <td>26892</td> <td>20667</td> <td>0.77</td> </tr> <tr> <td>Sept</td> <td>29382</td> <td>12659</td> <td>0.43</td> </tr> <tr> <td>Oct</td> <td>34181</td> <td>18998</td> <td>0.56</td> </tr> <tr> <td>Total</td> <td>307047</td> <td>163060</td> <td>0.53</td> </tr> </tbody> </table>					<b>Genting Tanjung Palm Oil Mill</b>				Month 2019	FFB / mt	Diesel /L	Diesel /FFB	Jan	35171	16304	0.46	Feb	33141	15368	0.46	Mac	34884	13219	0.38	April	30100	12806	0.43	May	29744	17660	0.59	June	26871	20641	0.77	July	26680	14738	0.55	Aug	26892	20667	0.77	Sept	29382	12659	0.43	Oct	34181	18998	0.56	Total	307047	163060	0.53
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	<p>The mill diesel consumption as detailed below</p> <p>The estates maintained similar records for the diesel consumption. Records were sighted and verified.</p> <table border="1" data-bbox="1061 558 1662 791"> <thead> <tr> <th><b>Tenegang Estate</b></th> <th>2017</th> <th>2018</th> <th>2019 (Oct )</th> </tr> </thead> <tbody> <tr> <td>FFB processed mt</td> <td>59058</td> <td>58278</td> <td>89389</td> </tr> <tr> <td>Diesel – estate L</td> <td>32393 5</td> <td>40754 2</td> <td>372912</td> </tr> <tr> <td>Diesel /FFB</td> <td>5.48</td> <td>6.99</td> <td>4.17</td> </tr> </tbody> </table> <table border="1" data-bbox="1055 823 1657 1056"> <thead> <tr> <th><b>Layang Estate</b></th> <th>2017</th> <th>2018</th> <th>2019 (Oct )</th> </tr> </thead> <tbody> <tr> <td>FFB processed mt</td> <td>33392</td> <td>32669</td> <td>28603</td> </tr> <tr> <td>Diesel – estate L</td> <td>18719 7</td> <td>24927 4</td> <td>200188</td> </tr> <tr> <td>Diesel /FFB</td> <td>5.61</td> <td>7.63</td> <td>7.00</td> </tr> </tbody> </table> <p>There were variation in the ratio performance attributed by factors i.e. mill throughput, design, machine line up and technology input, no of diesel engine etc. The estates have variation of crop trend and timing variance of the vehicles/machinery utilization. In addition the irregularity of the weather pattern also contributed to the diesel consumption differences.</p>	<b>Tenegang Estate</b>	2017	2018	2019 (Oct )	FFB processed mt	59058	58278	89389	Diesel – estate L	32393 5	40754 2	372912	Diesel /FFB	5.48	6.99	4.17	<b>Layang Estate</b>	2017	2018	2019 (Oct )	FFB processed mt	33392	32669	28603	Diesel – estate L	18719 7	24927 4	200188	Diesel /FFB	5.61	7.63	7.00	
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<p><b>Criterion 5.5:</b> 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.</p>																																		

Criterion / Indicator	Assessment Findings	Compliance
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 -	There was no land preparation in the Estates CU by burning ever since Genting Plantations practice zero burning as per the policy in the Zero Burning Policy dated 10/8/11 signed by the President & Chief Operating Officer. Therein stating <ul style="list-style-type: none"> <li>a) No open burning of any kind in all OU</li> <li>b) All types of waste products disposed appropriately</li> <li>c) Limited open burning allowed for cooking and religious purposes under appropriate supervision.</li> </ul> In the 2019 replants visited during the audit in GKBE it was evident that all palms were felled, shredded, windrowed and left to decompose	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 -	There was no evidence that fire had been used to prepare land for replanting in all the estates. No fire was used for waste disposal.	Complied
<b>Criterion 5.6:</b> Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.		

Criterion / Indicator		Assessment Findings	Compliance												
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 -	<p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. The 'Pollution Identification Environmental Improvement Action Plan' dated 17/10/19– is used to identify the waste products and sources of pollution is in place and is being reviewed accordingly. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1"> <thead> <tr> <th></th> <th>Receptors</th> <th>source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Source from boiler stack (smoke and particulate), vehicle &amp; generator (smoke and gases), anaerobic processes (ETP, EFB dumping – GHG emission</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro cyclone/clay bath /sterilizer condensate/clarification waste) &amp; boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>land</td> <td>Scheduled waste, domestic waste and industrial/process waste.</td> </tr> </tbody> </table>		Receptors	source	1	Air	Source from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping – GHG emission	2	Water	Cleaning water/run-off/process station waters (hydro cyclone/clay bath /sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	land	Scheduled waste, domestic waste and industrial/process waste.	Complied
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3	land	Scheduled waste, domestic waste and industrial/process waste.													

Criterion / Indicator		Assessment Findings	Compliance
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	<p>The <i>Pollution Identification Environmental Improvement Action Plan</i> identifies the waste products / sources of pollution and actions taken to mitigate and reduce them. The Plan is being reviewed accordingly the recent being on 18/7/2019.</p> <ul style="list-style-type: none"> <li>a) The main source of GHG from this operation is CO2 from fossil fuel combustion and NO2 from fertilizer applications.</li> <li>b) The reduction plan for minimizing NO2 emission is to replace straight fertilizers with compound fertilizers</li> <li>c) Reduction on tractor usage by implementing clusters harvesting and systematic evacuation. The structure cluster harvesting was verified.</li> </ul> <p>Green House Gaseous – Potential sources are being identified using 'Carbon Inventory Calculation Methodology. Emission Sources have been identified from Land Conservation, Fertilizer (mineral), Manufacture &amp; Transport, NO from fertilizer, Fuel Consumption, and reported in the Palm GHG Summary Report</p>	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 -	RSPO has made a compulsory for submitting GHG beginning 1/1/2017. All the Genting Plantations Mill/Estates audited had used RSPO Palm GHG v4.0 calculator as a tool. Records were maintained individually in the respective office. The final emissions value per product as shown in appendix C below.	Complied
<p><b>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</b></p>			
<p><b>Criterion 6.1:</b>            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.</p>			

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Criterion / Indicator	Assessment Findings	Compliance
6.1.1 A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	SIA recorded as RSPO Social Impact Assessment (SIA) and Human Rights Impact Assessment (HRIM) Report Genting Tenegang Estate (GTGE) October 2018. The report was prepared by Sustainability Department dated 31/10/2018. The report shown assessment involved participation by internal and external stakeholders among employees, shop owners, Humana school, contractors, surau, smallholders and government agencies. Genting Layang Estate (GLYE) October 2018	Complied
6.1.2 There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Evidence available as per records of external stakeholder meeting conducted at Genting Tanjung Estate Club House; Date: 21/10/2019 and external stakeholder meeting involved Government Agencies conducted at Genting Plantation Office Sabah (GPOS) Sandakan on 30/10/2019 attended by Balai Polis Sukau, Jabatan Perkhidmatan Veterinar Sandakan, Pejabat Kesihatan Daerah Kinabatangan, Klinik Kesihatan Batu Putih, Jabatan Pengangkutan Jalan Sandakan and Jabatan Hidupan Liar Kota Kinabatangan.  Information also provided through internal stakeholder meeting conducted on 28/8/2019 for Genting Tenegang Estate, 29/8/2019 for Genting Layang Estate and 20/8/2019 for Genting Tanjung Oil Mill.	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 -	Based on SIA & HRIM studies, a Social Management and Monitoring Plan of Genting Tenegang Estate (GTGE) Procedures and Responsibilities for Implementation; Last updated: 22/9/2019 has been established.	Complied

Criterion / Indicator	Assessment Findings	Compliance
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	Mitigation action plan last reviewed after External Stakeholder meeting conducted on 21/10/2019 for relevant issues raised by stakeholders.  Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	Not applicable as there is no scheme smallholders involved in the operating units.  Not applicable
<b>Criterion 6.2:</b> 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 -	The process implemented based on Sustainability Management Procedure for Consultation and Communication; SMP-GPB-17; Rev. 02; Date: 23/2/2018. Consultation & communication done through meetings, dialogs, and engagement to both internal & external stakeholders. Any complaints or grievances recorded in Genting Plantations Complaints/Grievance Record Book.  Complied

Criterion / Indicator	Assessment Findings	Compliance	
<p>6.2.2 A management official responsible for these issues shall be nominated.                      - Minor compliance -</p>	<p>Genting Tenegang Estate Appointment as Sustainability Social and Risk Management Representative for Adriansa Abdul Samad (Field Supervisor) dated 28/9/2019.</p> <p>Genting Layang Estate Appointment as Person In-Charge for Documentation requirements of ISCC, RSPO and MSPO Sustainability Standards for Muhammad Syafiq Ikhwan Bin Husni (Assistant Manager) dated 2/1/2019.</p> <p>Appointment as Management Representative for ISCC, RSPO and MSPO Related Matters of Senior Mill Manager Genting Tanjung Oil Mill; Date: 24/10/2017.</p>	<p>Complied</p>	
<p>6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.                      - Minor compliance -</p>	<p>Genting Tenegang Estate list of Internal Stakeholders; Date: 1/9/2019 and List of External Stakeholders; Date: 1/8/2019</p> <p>Genting Layang Estate list of Internal Stakeholders; Date: August 2019 and List of External Stakeholders; Date: 1/8/2019</p> <p>Genting Tanjung Oil Mill Stakeholder List; Date: 30/9/2019 consist of Approved Suppliers, Refinery Buyers, General Suppliers, Workers Committee Representatives, Gender Committee Representatives, External Stakeholders (Government)</p>	<p>Complied</p>	
<p><b>Criterion 6.3:</b>                      There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.</p>			
<p>6.3.1</p>	<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.                      - Major compliance -</p>	<p>Mechanism implemented as per Whistleblower Policy; Rev. 00; Date: 4/4/2013 under the Sustainability Management Group Policies established through specific contact person at Genting Plantation HQ office via phone or email or website form.</p>	<p>Complied</p>



Criterion / Indicator	Assessment Findings	Compliance
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	Complied
<b>Criterion 6.4:</b> Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.		
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	Complied

Criterion / Indicator	Assessment Findings	Compliance
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 -	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 -	Complied
<b>Criterion 6.5:</b> 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.		

<p>6.5.1</p>	<p>Documentation of pay and conditions shall be available.          - Major compliance -</p>	<p><u>Genting Tenegang Estate</u> sample:</p> <ul style="list-style-type: none"> <li>- Employee # E10300; Gang: Sprayer Div. 12; Date joined: 5/12/2018; Nationality: Indonesia</li> <li>- Employee # E11432; Gang: Replanting Div. 11; Date joined: 1/10/2017; Nationality: Indonesia</li> <li>- Employee # E11434; Gang: Loose Fruit Div. 12; Date joined: 1/10/2017; Nationality: Indonesia</li> <li>- Employee # E11281; Gang: Harvesting Div. 11; Date joined: 3/5/2016; Nationality: Indonesia</li> <li>- Employee # E11439; Gang: Loose Fruit Div. 9; Date joined: 1/10/2017; Nationality: Indonesia</li> <li>- Employee # E11663; Gang: Harvesting Div. 12; Date joined: 19/7/2019; Nationality: Indonesia</li> <li>- Employee # E11528; Gang: Manuring Div. 10; Date joined: 7/1/2018; Nationality: Indonesia</li> <li>- Employee # E11299; Gang: Gardener/Creche Ayah; Date joined: 3/5/2016; Nationality: Indonesia</li> <li>- Employee # E01132; Gang: Security Div. 10; Date joined: 28/12/2012; Nationality: Indonesia</li> </ul> <p><u>Genting Layang Estate</u> sample:</p> <ul style="list-style-type: none"> <li>- Employee # E01157; Gang: Harvester 2A; Date joined: 31/1/2018; Nationality: Indonesia</li> <li>- Employee # E01168; Gang: Loose Fruit 5C; Date joined: 6/9/2018; Nationality: Indonesia</li> <li>- Employee # E00887; Gang: Creche Ayah 5C; Date joined: 12/8/2013; Nationality: Indonesia</li> <li>- Employee # E01185; Gang: Sprayer 5C; Date joined: 28/1/2019; Nationality: Indonesia</li> <li>- Employee # P00058; Gang: Manuring 6A; Date joined: 10/10/2013; Nationality: Indonesia</li> </ul>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> <li>- Employee # E00866; Gang: Upkeep Compound 6A; Date joined: 24/10/2014; Nationality: Malaysia</li> <li>- Employee # E01120; Gang: Water Treatment Operator 6A; Date joined: 1/8/2017; Nationality: Indonesia</li> <li>- Employee # E00992; Gang: Watchman 4D; Date joined: 4/4/2015; Nationality: Indonesia</li> </ul> <p><u>Genting Tanjung Oil Mill</u> sample:</p> <ul style="list-style-type: none"> <li>- Employee # E000161; Gang: G14 Shovel Driver; Date joined: 6/12/2018; Nationality: Philippine;</li> <li>- Employee # E00270; Gang: G15 Incinerator Operator; Date joined: 8/5/2019; Nationality: Indonesia</li> <li>- Employee # E00268; Gang: G10 Marshalling Yard; Date joined: 11/4/2019; Nationality: Indonesia</li> <li>- Employee # E00255; Gang: G11 Kernel Plant Operator; Date joined: 6/10/2017; Nationality: Indonesia</li> <li>- Employee # E00062; Gang: G05 Electrical Wireman; Date joined: 27/6/2008; Nationality: Philippine</li> <li>- Employee # E00089; Gang: G11 Nut Polishing Plant; Date joined: 31/10/2008; Nationality: Indonesia</li> <li>- Employee # E00128; Gang: G04 Lab Sampler; Date joined: 9/5/2013; Nationality: Indonesia</li> <li>- Employee # E00127; Gang: G11 Cage Handler/Crane; Date joined: 4/7/2011; Nationality: Indonesia</li> </ul>	

Criterion / Indicator	Assessment Findings	Compliance
<p>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 -</p>	<p>Agreement template Sabah OUs; Revised on 1/12/2017; Para 16.1 Cuti Bersalin "Pekerja wanita tempatan layak menerima cuti bersalin dengan elaun bersalin selama tidak kurang 60 hari (termasuk hari-hari rehat atau cuti umum yang jatuh dalam tempoh itu) setelah memenuhi syarat dan kelayakan mengikut Ordinan Buruh Sabah 2005"</p>	<p>Complied</p>
<p>6.5.3 Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.                      - Minor compliance –</p>	<p>The mill and estates have provided housing facilities to the workers. They also supplied water tanks for the workers to store water. Water was treated in the mill treatment plant and found is clean. Interview with the housewives and workers found out that water and electricity was provided without charges. Clinic is located in the estate compound to provide medical facilities to all the workers. Community Learning Center (CLC) was also found in the estate. Crèche is provided in the mill and estate for the kids.</p> <p>Borang Pemeriksaan Kawasan Perumahan GTOM; Date: 9/7/2019</p> <p>Based on the result of analysis for drinking water sample taken from treated water storage tank in mill, the drinking water supplied found complied to the Standard for Water &amp; Package Drinking 25<sup>th</sup> A Schedule of Malaysian Food 1983 (Act 281) &amp; Regulation (Subregulation 394 (1) as at 1<sup>st</sup> March 2013. Results available in Certificate of Analysis; Report # GentingTanjung/E/N14802; Dated: 12/7/2019 by Envilab Sdn. Bhd.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance –	Complied
<b>Criterion 6.6:</b> 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.		
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Complied
<b>Criterion 6.7:</b> Children are not employed or exploited.		

Criterion / Indicator	Assessment Findings	Compliance
6.7.1 There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Genting Plantation Berhad has established and implemented minimum age policy and no children below ages of 18 working in the estate and this was proven through checking the list of employees as well as their biodata and through estate visits  Inspection of a sample of personnel files at the estates office confirmed recruits' ages were checked against their Identity Card for Malaysian workers or their passport in the case of foreign workers. Under-age persons were not observed at any of the work locations visited.	Complied
<b>Criterion 6.8:</b> Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.		
6.8.1 A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	Genting Plantation Berhad has established a Social Policy, signed by President & Chief Operating Officer dated on 22.06.2015 in order to ensure equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. Inspection of a sample of pay records and interviews of staff and workers in all estates did not identify any issues related to discrimination.  Based on interview with employees from different backgrounds, there is no evidence that the management engage in or support any discriminatory practices. The commitment to no discrimination is also stated in the company's social policy.	Complied

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 -	<p>The Agreement template Sabah OUs; Revised on 1/1/2018; for Para 16.1 Cuti Bersalin specifying "Pekerja wanita tempatan layak menerima cuti bersalin dengan elaun bersalin selama tidak kurang 60 hari (termasuk hari-hari rehat atau cuti umum yang jatuh dalam tempoh itu) setelah memenuhi syarat dan kelayakan mengikut Ordinan Buruh Sabah 2005" shown that there's discrimination against migrant women workers for the entitlement of maternity leave.</p> <p>This has indicated as evidence that employees among migrant women workers have been discriminated against. Hence a Major nonconformance has been raised on the matter.</p>	Major nonconformance
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 -	<p>Genting Plantation Berhad has established a Social Policy, signed by President &amp; Chief Operating Officer dated on 22.06.2015 in order to ensure equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. Inspection of a sample of pay records and interviews of staff and workers in all estates did not identify any issues related to discrimination.</p> <p>Based on interview with employees from different backgrounds, there is no evidence that the management engage in or support any discriminatory practices.</p> <p>The commitment to no discrimination is also stated in the company's social policy.</p>	Complied
<b>Criterion 6.9:</b> There is no harassment or abuse in the work place, and reproductive rights are protected.		



Criterion / Indicator	Assessment Findings	Compliance
<p>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.</p> <p>- Major compliance -</p>	<p>Genting Plantation Berhad has established Sexual Harassment Policy, dated 3/8/2009 . The Policy has signed by the Mr. Yong Chee Kong, President &amp; Chief Operating Officer to prevent sexual and all other forms of harassment and violence.</p> <p>The policy was communicated by displayed at the strategic location, induction &amp; training, memo and meetings as per sample records as following:</p> <ul style="list-style-type: none"> <li>- Genting Tenegang Estate Mesyuarat Ahli Jawatankuasa Wanita &amp; Kanak-Kanak (JWKK); Date: 13/8/2019; Previous: 12/2/2019</li> <li>- Minit Mesyuarat 2019 Jawatankuasa Wanita &amp; Kanak-Kanak (JWKK) Genting Layang Estate; Date: 20/8/2019</li> <li>- Minit Mesyuarat Persatuan Wanita; Date: 14/9/2019; Venue GTOM Meeting Room</li> </ul> <p>Interviews of internal stakeholders confirmed awareness and understanding of the Policy.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
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 -	<p>Genting Plantation Berhad has established Social Policy which incorporating special labour and human rights requirements, dated 22/6/2015 and People Policy, dated 3/8/2009 to protect the reproductive rights of all, especially of women. The Policy has signed by the Mr. Yong Chee Kong, President &amp; Chief Operating Officer.</p> <p>The policy was communicated by displayed at the strategic location, induction &amp; training, memo and meetings as per sample records as following:</p> <ul style="list-style-type: none"> <li>- Genting Tenegang Estate Mesyuarat Ahli Jawatankuasa Wanita &amp; Kanak-Kanak (JWKK); Date: 13/8/2019; Previous: 12/2/2019</li> <li>- Minit Mesyuarat 2019 Jawatankuasa Wanita &amp; Kanak-Kanak (JWKK) Genting Layang Estate; Date: 20/8/2019</li> <li>- Minit Mesyuarat Persatuan Wanita; Date: 14/9/2019; Venue GTOM Meeting Room</li> </ul> <p>Interviews of internal stakeholders confirmed awareness and understanding of the Policy.</p>	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 -	<p>A specific grievance mechanism which respects anonymity and protects complainants upon requested was established as a gender committee as per sample appointment of committee members sighted i.e. Surat Perlantikan Ahli Jawatankuasa Kebajikan Wanita; Ref. Memo # GROM/601/14/17; Date: 29/11/2017.</p>	Complied
<b>Criterion 6.10:</b> 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 -	<p>FFB pricing based on records of MPOB Press Release; Date: 1/11/2019; MPOB Monthly FFB Reference Price - October 2019 (Mill Gate). Sighted GTOM displayed the previous and current FFB price on the notice board in front of weighbridge office for Aug, Sep and Oct 2019. Noted for Sabah Region Grade C (OER 20%) price: RM374/tonne for Oct 2019.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
6.10.2	<p>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).</p> <p>- Major compliance -</p>	Complied
6.10.3	<p>Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p>- Minor compliance -</p> <p><u>Genting Tenegang Estate:</u></p> <ul style="list-style-type: none"> <li>- Memorandum of Agreement (MOA) for Contractor (For Contracts With General Work Orders); Contractor: Andi Haslinda Binti Andi Sikandar; Agreement # GTGE/MOA/19/06; Agreement period: 1/1/2019 – 31/12/2019</li> <li>- Memorandum of Agreement (MOA) for Contractor (For Contracts With General Work Orders); Contractor: Kartini Binti Kamaruddin; Agreement # GTGE/MOA/19/08; Agreement period: 1/1/2019 – 31/12/2019</li> </ul> <p><u>Genting Layang Estate:</u></p> <ul style="list-style-type: none"> <li>- Loading and Transporting of Fresh Fruit Bunch (FFB) and Loose Fruit Agreement; Contractor: Man Fook Hing Transport PLT; Agreement # GLYE/TC/19/04; Agreement period: 1/1/2019 – 31/12/2019</li> </ul> <p>GTOM provided evidence of explanation to external FFB suppliers as per Polisi Perolehan Tandan Buah Sawit (TBS)" [External Fresh Fruit Bunch (FFB) Procurement Policy Agreement] for following signed External FFB Supplier samples as per following:</p> <ul style="list-style-type: none"> <li>- Winking Plantation Sdn. Bhd.; Signed date: 22/8/2019</li> <li>- Harus Permai Sdn. Bhd.; Signed date: 26/8/2019</li> <li>- Tentu Murni Sdn. Bhd.; Signed date: 27/8/2019</li> </ul>	Complied

Criterion / Indicator	Assessment Findings	Compliance
6.10.4 Agreed payments shall be made in a timely manner. - Minor compliance -	<u>Genting Tenegang Estate:</u> - Harvesting contract payment ref. # GTGE/11/G1910001; Date: 1/10/2019; MOA ref. # GTGE/MOA/19/08 - Harvesting contract payment ref. # GTGE/09/G1910001; Date: 1/10/2019; MOA ref. # GTGE/MOA/19/06  <u>Genting Layang Estate:</u> - Schedule of work completed (SOWC) – GWO payment ref. # GLYE/13/F1910001; Date: 31/10/2019; Contractor ref. # 18001358 (Man Fook Hing Transport PLT)  GTOM FFB suppliers payment samples: - FFB Supplier: Ace Foremost Sdn. Bhd.; Payment transaction ref. # 517692290100012; Date: 11/10/2019 - FFB Supplier: Syarikat Yu Kwang Development Sdn. Bhd.; Payment transaction ref. # 517974490100201; Date: 12/11/2019	Complied
<b>Criterion 6.11:</b> 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 –	Contributions made were demonstrated as following samples: Genting Layang Estate Summary of Corporate Social Responsibility; Date: 19/10/2019: - Badminton Match; RM500/year - Labour day celebration: food, volleyball, sepak takraw & futsal competitions, prize giving, lucky draw; RM7000 - Sambutan hari raya korban, majlis berbuka puasa; GTOM: Membeli sapi untuk kenduri kilang 2019; Ref. # GTOM/601/18/001; Date: 22/4/2019	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 scheme smallholders involved within Getting Tanjung Oil Mill certification units. Hence, this requirement is not applicable.	Not applicable
<b>Criterion 6.12:</b> No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	The company has recruited all the employees with legal identification for local and valid passport and work permit for foreign workers. Contract of employment was signed by the workers prior to work. Sampled of foreign workers with valid work permit as sighted as per indicator 6.5.1 above.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	No any contract substitution occurred among Genting Plantation workers.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Genting Plantation Berhad has established Social Policy which incorporating special labour and human rights requirements, dated 22/6/2015 and People Policy, dated 3/8/2009. The Policy has signed by the Mr. Yong Chee Kong, President & Chief Operating Officer.	Complied
<b>Criterion 6.13:</b> Growers and millers respect human rights.			

Criterion / Indicator	Assessment Findings	Compliance
6.13.1	<p>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 -</p> <p>Genting Plantation Berhad has established Social Policy which incorporating special labour and human rights requirements, dated 22/6/2015 and People Policy, dated 3/8/2009. The Policy has signed by the Mr. Yong Chee Kong, President &amp; Chief Operating Officer.</p> <p>The policy was communicated by displayed at the strategic location, induction &amp; training, memo and meetings as per sample records as following:</p> <ul style="list-style-type: none"> <li>- Genting Tenegang Estate Mesyuarat Ahli Jawatankuasa Wanita &amp; Kanak-Kanak (JWKK); Date: 13/8/2019; Previous: 12/2/2019</li> <li>- Minit Mesyuarat 2019 Jawatankuasa Wanita &amp; Kanak-Kanak (JWKK) Genting Layang Estate; Date: 20/8/2019</li> <li>- Minit Mesyuarat Persatuan Wanita; Date: 14/9/2019; Venue GTOM Meeting Room</li> </ul> <p>Interviews of internal stakeholders confirmed awareness and understanding of the Policy.</p>	Complied
6.13.2	<p>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.</p> <p>Genting Plantations has set up the school facility (Community Learning Centre-CLC) within the estate's compound for foreign workers children. Contributions include tables/chairs, toilets, water supply, lights, fans and gated compound. An assistant teacher is allocated to the school to support the teacher from CLC.</p>	Complied
<p><b>Principle 7: Responsible development of new plantings</b></p>		
<p><b>Genting Tanjung Oil Mill</b> and supply base did not carry out any new plantings after November 2005. Therefore, the requirement of Principle 7 is not applicable during the annual surveillance. The immature areas are replanted area as verified during site visit. Document reviewed on the land title and area statement of planting cycle confirmed that no new plantings activities since November 2005.</p>		
<p><b>Principle 8: Commitment to continual improvement in key areas of activity</b></p>		
<p><b>Criterion 8.1:</b></p>		

Criterion / Indicator	Assessment Findings	Compliance
<p>Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.</p>		
<p>8.1.1 The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of pesticides(Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);</li> <li>• Optimising the yield of the supply base.</li> </ul> <p>- Major compliance -</p>	<p><i>Reduction in use of pesticides (Criterion 4.6)</i>            The estate adopted several continuous improvements in reducing of pesticides i.e. increasing planting of beneficial plants mainly <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i>.</p> <ul style="list-style-type: none"> <li>- The estate also adopted planting of <i>Leguminious</i> Cover Crop mainly <i>Pueraria Javanica</i> and <i>Calopogonium Mucunoides</i> at replanting area to minimize circle and selective weeding.</li> <li>- Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced encouraging soft grasses in inter row and frond stacking area.</li> <li>- Mills wastes such as EFB were used as fertilizer in the selected fields where the application is economically viable currently in Tanjung Estate being the host estate for the mill</li> </ul> <p><i>Environmental impacts (Criteria 4.3, 5.1 and 5.2)</i>            Environmental impact assessment, management action plans and continuous improvement plan for the estate has been updated and monitored by management. Among others the improvement actions:</p> <ul style="list-style-type: none"> <li>- Construction of sump at chemical and workshop to prevent ground or water contamination.</li> <li>- Collect back chemicals bags and allocate store for control of misused.</li> <li>- use of tray for tractor parking to prevent ground contamination</li> </ul> <p><i>Waste reduction (Criterion 5.3)</i>            The management had planned to reduce emission by daily inspection and monitoring for their farm tractors / lorries to prevent any leakage and problem which can impact on smoke emission.</p> <p><i>Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8)</i></p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>The management of the estate had plan to reduce emission by daily inspection and monitoring for their farm tractors/ lorries to prevent any leakage and problem which can impact on smoke emission</p> <p><i>Optimising the yield of the supply base.</i>            The yield performance has always been the top priority in ensuring long-term economic and financial viability. In general, various efforts to optimise the yield of the plantation among others</p> <ul style="list-style-type: none"> <li>- maximizing crop recovery,</li> <li>- optimum ripeness standard (harvest ripe bunches only and 100% loose fruit collection),</li> <li>- the soil fertility were maintained and planting only high yielding planting material</li> </ul> <p><i>Genting Palm Oil Mill</i>            The mill had the following projects in the forthcoming 5 years in the CAPEX.</p> <ul style="list-style-type: none"> <li>- Construction of the ESP plant to improve the dust particulate emission anticipated to commission in 2020. Cost of approximately RM.2.2m</li> <li>- 3MCPD chemical removal from the CPO through new machinery installed in the oil process line anticipated in 2<sup>nd</sup> half of 2020.</li> <li>- Bio-Gas Plant installation currently on feasibility study by GPB Head Office</li> </ul> <p>Action plan for continual improvement has been implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill. On-going monitoring of management plan was sighted for the following aspects:            i) Reduction in use of pesticides – cattle grazing through integrated cattle management for the estate.</p>	



Criterion / Indicator	Assessment Findings	Compliance
	ii) Waste Reduction – Continuous recycling programme through 3R campaign.	

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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 23 July 2018	Any unresolved non-compliances
1	Genting Plantations (WM) Sdn Bhd & Setiamas Sdn Bhd(100%)for estates	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,				
				Dec,2015		
				July, 2015		
6	Genting Plantations (WM) Sdn Bhd (100%)for estates	Genting Selama Estate, Kedah, Malaysia		July,2015 To be re-certified in July 2019	Voluntary Suspension of the Certificate w.e.f 1 Sept 2017	Land title conversion in progress
7	Genting SDC Sdn Bhd (100%)	Genting Sabapalm Estate, Sabah, Malaysia	Supply base for Genting Sabapalm Oil Mill, Sabah, Malaysia	Aug,2015	Certified	None
8	Genting Tanjung 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 (	Genting Jambangan Estate, Sabah, Malaysia	Supply base for Genting Jambangan Oil	Sept 2019		Concept Note and Remediation Plan has been

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

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	Status as of 23 July 2018	Any unresolved non-compliances	
25	PT Susantri Permai (95%)	Puroh Estate Masaha Estate Zircon Hill Estate	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia	Oct, 2022		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		SP Plasma		Oct, 2023		
26	PT Kapuas Maju Jaya (95%)	Waterfall Estate I & II Muhun Estate I & II Talawang Estate I & II	Supply bases for Golden Hill Oil Mill, Kalimantan Indonesia	Oct,2022		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		KMJ Plasma		Oct, 2023		
27	PT Dwie Warna Karya ( 95%)	Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate		Oct , 2022		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		DWK Plasma		Oct, 2023		
28	PT Citra Sawit Cemerlang (70%)	CSC Estates	Supply base for CSC Oil Mill*	Oct,2021		In process of obtaining HGU.
29	PT Surya Agro Palma (70%)	SAP Estate 1&2 SAP Estate 3&4 SAP Estate 5&6	Supply base for SAP Oil Mill*	Oct, 2020		In process of obtaining HGU.
30	PT Agro Abadi Cemerlang (70%)	AAC 1 & 2				NPP In Progress. HCV report being reviewed at HCVRN.
		AAC 3 & 4				
31	PT Palma Agro Lestari Jaya (70%)	PALJ Estates	Supply base for PALJ Oil Mill*	Aug,2023		NPP In Progress. HCV report under review by HCVRN.
		PALJ Plasma				
32	Knowledge One Investment Pte Ltd ( 85%)-PT Kharisma Inti Usaha ( KIU)	KIU 1 & 2 KIU 3 & 4	Supply base for KIU Oil Mill	July, 2019		In progress to engage consultants to carry out assessments as per NPP requirements.
		KIU Plasma		July 2022		

**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.

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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

**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in 2018 for Genting Tanjung Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2018 for Genting Tanjung Palm Oil Mill and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.32
PK	1.32

Extraction	%
OER	20.51
KER	5.38

Production	t/yr
FFB Process	314,483.93
CPO Produced	64,878.03
PK Produced	15,881.44

Land Use	Ha
OP Planted Area	16,962.38
OP Planted on peat	-
Conservation (forested)	499.04
Conservation (non-forested)	-
<b>Total</b>	<b>17,461.42</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	149,722.17	0.50	-	-	-	-	149,722.17	0.50
CO <sub>2</sub> Emission from fertilizer	9,798.66	0.03	-	-	-	-	9,798.66	0.03
N <sub>2</sub> O Emmisions from peat	-	-	-	-	-	-	-	-
N <sub>2</sub> O Emmisions from fertilizer	8,579.94	0.03	-	-	-	-	8,579.94	0.03
Fuel Consumption	6,090.43	0.02	-	-	-	-	6,090.43	0.02
Peat Oxidation	-	-	-	-	-	-	-	-
<b>Sink</b>								
Crop Sequestration	- 82,888.33	- 0.28	-	-	-	-	- 82,888.33	- 0.28

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Conservation Sequestration	- 4,576.20	- 0.02	-	-	-	-	- 4,576.20	- 0.02
<b>Total</b>	86,726.67	0.29	-	-	29,665.56	-	116,392.52	0.29

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	396.05	-
Fuel Consumption	708.44	-
Grid Electricity Utilisation	7,051.58	0.02
<b>Credit</b>		
Export of Grid Electricity	- 2,873.24	- 0.01
Sales of PKS	-	-
Sales of EFB	-	-
<b>Total</b>	5,282.83	0.01

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

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

\*This mill has no kernel crusher operation.

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

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

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

<b>5.1 Applicability of the general chain of custody requirements for the supply chain</b>									
	<b>Requirement</b>	<b>Evidence</b> For any N/A raised, justification is required.	<b>Compliance</b> (Yes / No or N/A)						
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 Plantation headquarter has the physically handle the RSPO Certified Sustainable oil palm products. All trading, contract and sales were managed by Genting Plantation Marketing department at HQ that held Palm Trace registration number for respective mill (Genting Tanjung Oil Mill: RSPO_PO1000005521)	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.	Genting Tanjung Oil Mill (GTOM) is not a trader or distributor.	Not applicable						
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.	Company info available through RSPO IT Platform as following: <table border="1" data-bbox="1144 1034 1899 1177"> <tr> <td>Member Name</td> <td>Genting Tanjung Oil Mill</td> </tr> <tr> <td>Member ID</td> <td>RSPO_PO1000005521</td> </tr> <tr> <td>RSPO Membership Number</td> <td>1-0086-06-000-00(Genting Plantations Berhad)</td> </tr> </table>	Member Name	Genting Tanjung Oil Mill	Member ID	RSPO_PO1000005521	RSPO Membership Number	1-0086-06-000-00(Genting Plantations Berhad)	Yes
Member Name	Genting Tanjung Oil Mill								
Member ID	RSPO_PO1000005521								
RSPO Membership Number	1-0086-06-000-00(Genting Plantations Berhad)								
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	No processing aids needed and included within GTOM scope of certification.	Yes						
<b>5.2 Supply chain model</b>									



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.	The Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Genting Tanjung Oil Mill is certified with Mass Balance Module.	Yes
<b>5.3. Documented Procedures</b>			
5.3.1	<p>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:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> </ul>	<p>Supply Chain and Traceability (Mill) Procedure Manual, Doc. No. SMP-GPB- 23, Rev.09 dated 23/9/2019 has been established to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. Besides, procedures that are relevant were developed as below:</p> <ul style="list-style-type: none"> <li>a. Incoming Inspection (Direct Material), Doc. No. PM-PRD-04 dated 2/1/2018</li> <li>b. Product Identification &amp; Traceability, Doc. No. PM-PRD-01 dated 2/1/2018</li> <li>c. Handling, Storage, Preservation and Delivery, Doc. No. PM-LAB-03 dated 2/1/2018</li> <li>d. Internal Audit, Doc. No. PM-IA-01 dated 2/1/2018</li> <li>e. Management Review, Doc. No. PM-MR-01 dated 2/1/2018</li> </ul>	Yes
	<ul style="list-style-type: none"> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>	<p>Among the records included in the procedures are:</p> <ul style="list-style-type: none"> <li>a. Weighbridge tickets</li> <li>b. Dispatch of CPO/PK delivery note</li> <li>c. Daily Production Report</li> </ul>	Yes

		<p>d. Mass Balance Worksheet e. Training records</p> <p>All the records were found to be up-to-date. The following training records were sighted for SCC: a) GHG Calculation/Mass Balance New Format Training dated 20/10/19 b) RSPO, MSPO and ISCC Supply Chain Training dated 16/8/19 c) Traceability and Mass Balance Training dated 16/8/19</p> <p>The above trainings involved the person responsible such as Mill Manager, Weighbridge operator and transporters. Attendance list was sighted.</p>	
	<ul style="list-style-type: none"> <li>• Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard.</li> </ul>	<p>The Senior Mill Manager has appointed Chief Clerk of Genting Tanjung Oil Mill as person-in-charge for Supply Chain, Traceability and Mass Balance requirements of RSPO, ISCC and MSPO sustainability standards. Appointment letter dated 25/1/2017 was sighted. The person-in-charge has been trained on 23/10/2019 by Sustainability Executive. Interviewed with the Chief Clerk confirmed that she was able to demonstrate the implementation of their procedures in accordance to the standard.</p>	Yes
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>Internal Audit Procedure, Doc. No. PM-IA-01 dated 2/1/2018 was developed and implemented in the Oil Mill. The frequency of the internal audit is not less than once a year as per the procedure. The requirements of RSPO have been addressed in the procedure.</p>	Yes
	<p>ii) effectively implements and maintains the standard requirements within its organization</p>	<p>The last internal audit was carried out on 24/10/2019 by Sustainability Executive. Verified that the Audit Plan, Audit Checklist and Audit Report been prepared and conducted</p>	Yes

		accordingly. There was 1 non-conformance raised during the audit and been closed effectively.	
<b>5.4. Purchasing and goods in</b>			
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"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill. Sampled following FFB Despatch Note from RSPO certified estates:</p> <p>a) Despatch Note#094783 dated 30/10/19 – Genting Landworthy Estate</p> <p>b) Despatch Note#107733 dated 31/10/19 – Genting Tanjung Estate</p> <p>c) Despatch Note#62086 dated 19/9/19 – Genting Bahagia Estate</p> <p>d) Despatch Note#054233 dated 15/9/19 – Genting Layang Estate</p> <p>Verified that name and address of the buyer, name and address of the seller, loading or shipment/delivery date, date on which the documents were issued, description of the product – Mass Balance, quantity of the products delivered, related transport documentation- D.O, Supply Chain certificate number of the seller &amp; identification number been made available accordingly on the sampled Despatch Note.</p>	Yes
	<ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	The information was available in various documents such as delivery order and weighbridge tickets.	Yes
	<ul style="list-style-type: none"> <li>• The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required</li> </ul>	The mill has a list of certified FFB suppliers which has the	

	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.	information about certificate number and validity period. This is applied to both second and third party FFB suppliers. The origins of all third-party sourced Fresh Fruit Bunches (FFB) is verified via list of External Stakeholders (FFB Supplier) approved list dated Oct-2019. Verified that Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment.	Yes
	<ul style="list-style-type: none"> <li>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 (<a href="http://www.rspo.org">www.rspo.org</a>) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.</li> </ul>	A check of the validity of supply chain certification of supplier is done via the list of RSPO Supply Chain Certified sites on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ).	Yes
	<ul style="list-style-type: none"> <li>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.</li> </ul>	NA – this part is applicable for supply chain actor after refinery.	Not applicable
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Addressed in the SOP, Supply Chain and Traceability, SMP-GPB-23, Rev:09 dated 23/9/19, clause 9.7 and 9.8 for handling of Non-conforming Products.	Yes
<b>5.5. Outsourcing activities</b>			
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 independement 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 instructions for tank</p>	<p>The company has outsourced the transportation for CPO and PK delivery to third parties. Transporter Agreements were sighted as below:</p> <p>a. Landasan Kember Sdn Bhd valid from 1/1/2018 to 31/12/2020 for CPO and PK.</p> <p>b. Chong Shu Min Trading valid from 1/1/2018 to 31/12/2020 for CPO and PK.</p> <p>Requirement to adhere to RSPO standard is clearly defined in the agreement and the contractors have acknowledged on the</p>	Yes

	movements are controlled by the certified organization (not the tank farm manager).	requirements to be complied. The transporters have been trained on the RSPO Supply Chain and Traceability (Mill) procedure on 16/8/19 by Sustainability Executive. Attendance list of the training was sighted. The management has carried out Supplier Monitoring Report – CPO Tanker Transporters on yearly basis and the last monitoring was carried out on 30/06/2019 by Mill Manager for the monitoring period from 1/6/2018 to 30/6/2019 for Landasan Kembar and on 31/7/19 for monitoring period from 1/8/18-31/7/19 for Chong Shu Min Trading. The management has decided to continue the transporters as approved suppliers.	
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;	Not applicable as there was no outsourcing activity which is within the scope of their RSPO Supply Chain Certification as the CPO mill.	Not applicable
	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.	Not applicable as there was no outsourcing activity which is within the scope of their RSPO Supply Chain Certification as the CPO mill.	Not applicable
	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	Not applicable as there was no outsourcing activity which is within the scope of their RSPO Supply Chain Certification as the CPO mill.	Not applicable
	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	Not applicable as there was no outsourcing activity which is within the scope of their RSPO Supply Chain Certification as the CPO mill.	Not applicable

	respective operations, systems, and any and all information, when this is announced in advance.		
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.	Not applicable as there was no outsourcing activity which is within the scope of their RSPO Supply Chain Certification as the CPO mill.	Not applicable
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.	Not applicable as there was no outsourcing activity which is within the scope of their RSPO Supply Chain Certification as the CPO mill.	Not applicable
<b>5.6. Sales and goods out</b>			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/ delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>Minimum information of RSPO certified products available in trading contract documents as per following sample contracts:</p> <p>CPO (uncertified)</p> <ul style="list-style-type: none"> <li>- Buyer: Lahad Datu Edible Oils Sdn. Bhd.; Contract # SSD/0919/T03CPO; Date: 19/9/2019; Commodity: Crude Palm Oil; Quantity: 1,000mt</li> </ul> <p>CPO ISCC (certified)</p> <ul style="list-style-type: none"> <li>- Buyer: Genting Musimmas Refinery Sdn. Bhd.; Contract # SSD/1019/T01CPO; Date: 24/9/2019; Commodity: ISCC EU Crude Palm Oil; Quantity: 3,220mt</li> </ul> <p>CPO RSPO MB (certified)</p> <ul style="list-style-type: none"> <li>- Buyer: Genting Musimmas Refinery Sdn. Bhd.; Contract # SSD/1019/T02CPO; Date: 24/9/2019; Commodity: RSPO MB Crude Palm Oil; Quantity: 1,530mt</li> </ul> <p>PK (uncertified)</p>	Yes

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		<ul style="list-style-type: none"> <li>- Buyer: KLK Premier Oils Sdn. Bhd.; Contract # SSD/1019/T01PK; Date: 23/9/2019; Commodity: Palm Kernel; Quantity: 300mt</li> </ul> <p>PK RSPO MB (certified)</p> <ul style="list-style-type: none"> <li>- Buyer: KLK Premier Oils Sdn. Bhd.; Contract # SSD/1019/T02PK; Date: 23/9/2019; Commodity: RSPO MB Palm Kernel; Quantity: 1,000mt</li> </ul>	
	<ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	<p>A complete and detail information were presented in the transaction documents as per following:</p> <p>Sample dispatch of CPO:</p> <ul style="list-style-type: none"> <li>- Uncertified Buyer: Lahad Datu Edible Oils Sdn. Bhd.; W/bridge ticket # CPO19000331W; Date: 25/9/2019; DO # 26418; Contract # SSD/0919/T03CPO; Nett weight: 27,340kg; Vehicle # SAB2957V/SS2217V</li> <li>- ISCC EU Buyer: Genting Musimmas Refinery Sdn. Bhd.; W/bridge ticket # CPOEU19001363W; Date: 13/11/2019; DO # 73069/23055; Contract # SSD/1019/T01CPO; Nett weight: 40,220kg; Vehicle # SAB3718Y/SS908V</li> <li>- RSPO MB Buyer: Genting Musimmas Refinery Sdn. Bhd.; W/bridge ticket # CPOMB19000115W; Date: 11/10/2019; DO # 26576/72556; Contract # SSD/1019/T02CPO; Nett weight: 38,750kg; Vehicle # SM6378T/S838</li> </ul> <p>Sample dispatch of CPO:</p> <ul style="list-style-type: none"> <li>- Uncertified Buyer: KLK Premier Oils Sdn. Bhd.; W/bridge ticket # PK19000194W; Date: 30/10/2019; DO # 26784/72901; Contract # SSD/1019/T01PK; Nett weight: 19,840kg; Vehicle # SD7848A</li> <li>- RSPO MB Buyer: KLK Premier Oils Sdn. Bhd.; W/bridge ticket # PKMB19000616W; Date: 13/11/2019; DO #</li> </ul>	<p>Yes</p>

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		23057/73091; Contract # SSD/1019/T02PK; Nett weight: 18,710kg; Vehicle # SD858F	
	<ul style="list-style-type: none"> <li>For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	Announcement registered in PalmTrace system by the HQ Sales Department personnel. Based on PalmTrace transaction report, there were multiple (as per appendix) shipping announcements of both CSPO and CSPK made since the last assessment.	Yes
<b>5.7. Registration of transactions</b>			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>are mills, traders, crushers and refineries and;</li> <li>take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	As per CPO/PK Sales Procedure; Doc. # PM-MKT-01; Rev. 00; Issue date: 2/1/2018, the registration of PalmTrace was carried out by the HQ Sales Department based in Tawau. All transactions were registered accordingly in the PalmTrace.	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"> <li>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 / Announcement is based on members' own standard operating procedures.</li> </ul>	Based on the announcement summary, all the registrations were found to be in order.	Yes
	<ul style="list-style-type: none"> <li>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.</li> </ul>	Not applicable. Products are not sold beyond refinery.	Yes



	<ul style="list-style-type: none"> <li>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> </ul>	Based on the accounting (Mass Balance Allocation Sheet), the removal of volumes was done correctly when the products were sold as conventional.	Yes
	<ul style="list-style-type: none"> <li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>	Based on the announcement summary, all the confirmations were found to be in order.	Yes
<b>5.8. Training</b>			
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.	Genting Tanjung Oil Mill has developed Training Plan 2019 which has planned for the training of weighbridge operation and supply chain & traceability.	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.	<p>Training records were found to be up-to-date. The following training records were sighted for SCC:</p> <p>a) GHG Calculation/Mass Balance New Format Training dated 20/10/19</p> <p>b) RSPO, MSPO and ISCC Supply Chain Training dated 16/8/19</p> <p>c) Traceability and Mass Balance Training dated 16/8/19</p> <p>The above trainings involved the person responsible such as Mill Manager, Weighbridge operator and transporters. Attendance list was sighted.</p>	Yes
<b>5.9. Record Keeping</b>			
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.	Raw data records from GTOM Factory Crop Intake And Production Statement for daily, monthly to date and yearly to date production report was transferred to Mass Balance Worksheet – Monthly Input; ISCC, RSPO and MSPO Sustainable Products – Monthly Movement Summary Report (CPO) and Monthly Movement Summary Report (PK). Based on these records, the following were derived for Period of Nov 2018 – Oct 2019:	Yes

		<ul style="list-style-type: none"> <li>- Total FFB received (certified): 315,483.93mt</li> <li>- Total FFB received (uncertified): 71,696.99mt</li> <li>- Total FFB processed: 387,180.92mt</li> <li>- Total CPO produced: 79,622.36mt</li> <li>- Total PK produced: 19,620.12mt</li> </ul>	
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.	All relevant records related to supply chain available since at least past 2 years. Current records shown positive stock was reported as of the record dated 31/10/2019 for CPO = 2,132.91 mt.	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.	Based on the Mass Balance Sheet, the volume of CPO and PK has been allocated to both certified and noncertified products.	Yes
<b>5.10. Conversion factors</b>			
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 past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Conversion factor of CPO and PK production is depending on the actual OER and KER. Previous period under review's average were reported in earlier section of this report.	Yes
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Yes
<b>5.11. Claims</b>			

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.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Yes
<b>General corporate communications</b>			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No "off-product" claim made made by TSH LDPOM in the industry public domain.	Yes
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address ( <a href="http://www.rspo.org">www.rspo.org</a> ) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at <a href="http://www.rspo.org">www.rspo.org</a> ' where the link must lead to the member's profile page.	Not applicable.	Yes
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable.	Yes
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable.	Yes
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Not applicable.	Yes
<b>Business to business communications</b>			

5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to Business communication were made through the CSPO and CSPK trading contractual and transactions documentations between the mill and buyers. No further communications made by Genting for its raw products beyond its refinery and oleochemical plants buyers.	Yes
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Not applicable.	Yes
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Not applicable.	Yes
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified</p>	Not applicable.	Yes

	status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.		
<b>Business to consumer communication</b>			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	Not applicable.	Yes
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Not applicable.	Yes
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Not applicable.	Yes
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not applicable.	Yes
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	Not applicable.	Yes
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Not applicable.	Yes
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Not applicable.	Yes
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be	Not applicable.	Yes

	<p>undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a>.</p>		
<p><b>MODULE B – MASS BALANCE SPECIFIC RULES</b></p>			
<p><b>Auditor Hint:</b>          This specific rules shall be audited concurrently with the relevant Module C (including Module F &amp; G) under the Supply Chain Modular Requirements</p>			
<p><b>Minimum Mass Balance content</b></p>			
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>GTOM only delivered 100% oil palm content of RSPO MB-certified products to its buyers.</p>	<p>Yes</p>
<p><b>Labelling and trademark (MB)</b></p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>• The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not</li> </ul>	<p>Not applicable.</p>	<p>Yes</p>

	<p>guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</p> <p>a. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications &amp; Claims document.</p>		
<b>Messaging (MB)</b>			
	<ul style="list-style-type: none"> <li>• Messaging <b>ALLOWED</b> in storytelling in product-related communications includes:             <ul style="list-style-type: none"> <li>• [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain.</li> <li>• The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</li> </ul> </li> </ul>	Not applicable.	Yes
	<p>Messaging <b>NOT ALLOWED</b> in storytelling in product-related communications:</p>	Not applicable.	Yes

	<ul style="list-style-type: none"> <li>Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</li> </ul>		
<b>5.12. Complaints</b>			
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: 03, dated 21/3/2018 was established.	Yes
<b>5.13. Management Review</b>			
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.	The company has established Management Review procedure, Doc. No. PM-MR-01 dated 2/1/2018 on RSPO Supply Chain Certification Standard requirements. The frequency of the management review was set at least once a year.	Yes
5.13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> <li>Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>Customer feedback.</li> <li>Status of preventive and corrective actions.</li> <li>Follow-up actions from management reviews.</li> <li>Changes that could affect the management system.</li> <li>Recommendations for improvement.</li> </ul>	The last management review meeting was conducted on 31/10/2019 and meeting minutes was sighted. All the inputs were covered during the meeting as verified through the meeting minutes prepared by the Sustainability Executive – GPOS signed dated 7/11/19.	Yes
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>Improvement of the effectiveness of the management system and its processes.</li> <li>Resource needs.</li> </ul>	The output from management review including decisions and actions were clearly recorded in the minute of meeting dated 7/11/2019 pertaining to the improvement and resource needs.	Yes





**Appendix E: CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: Mass Balance)**

Requirements	Evidence	Compliance						
<b>E.1 Definition</b>								
<p>E.1.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3<sup>rd</sup> party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>The Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&amp;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>	<p>Yes</p>						
<b>E.2 Explanation</b>								
<p>E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&amp;C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</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>Yes</p>						
<p>E.2.2 The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).</p>	<p>Company info available through RSPO IT Platform as following:</p> <table border="1" data-bbox="1167 1114 1912 1257"> <tr> <td>Member Name</td> <td>Genting Tanjung Oil Mill</td> </tr> <tr> <td>Member ID</td> <td>RSPO_PO1000005521</td> </tr> <tr> <td>RSPO Membership Number</td> <td>1-0086-06-000-00(Genting Plantations Berhad)</td> </tr> </table>	Member Name	Genting Tanjung Oil Mill	Member ID	RSPO_PO1000005521	RSPO Membership Number	1-0086-06-000-00(Genting Plantations Berhad)	<p>Yes</p>
Member Name	Genting Tanjung Oil Mill							
Member ID	RSPO_PO1000005521							
RSPO Membership Number	1-0086-06-000-00(Genting Plantations Berhad)							
<b>E.3 Documented procedures</b>								

<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>Supply Chain and Traceability (Mill) Procedure Manual, Doc. No. SMP-GPB- 23, Rev.09 dated 23/9/2019 has been established to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. Besides, procedures that are relevant were developed as below:</p> <p>a. Incoming Inspection (Direct Material), Doc. No. PM-PRD-04 dated 2/1/2018</p> <p>b. Product Identification &amp; Traceability, Doc. No. PM-PRD-01 dated 2/1/2018</p> <p>c. Handling, Storage, Preservation and Delivery, Doc. No. PM-LAB-03 dated 2/1/2018</p> <p>d. Internal Audit, Doc. No. PM-IA-01 dated 2/1/2018</p> <p>e. Management Review, Doc. No. PM-MR-01 dated 2/1/2018</p>	<p>Yes</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 Senior Mill Manager has appointed Chief Clerk of Genting Tanjung Oil Mill as person-in-charge for Supply Chain, Traceability and Mass Balance requirements of RSPO, ISCC and MSPO sustainability standards. Appointment letter dated 25/1/2017 was sighted. The person-in-charge has been trained on 23/10/2019 by Sustainability Executive. Interviewed with the Chief Clerk confirmed that she was able to demonstrate the implementation of their procedures in accordance to the standard.</p>	<p>Yes</p>
<p>E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBS.</p>	<p>Supply Chain and Traceability (Mill) Procedure Manual, Doc. No. SMP-GPB- 23, Rev.09 dated 23/9/2019 has been established to ensure the handling of incoming FFB and outgoing certified and uncertified CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. System available to make marking on the receiving documents to differentiate the certified and noncertified FFB received. Interviewed the weighbridge officer and confirmed</p>	<p>Yes</p>

	that the FFB from own estates will have the stamp on the dispatch chit.	
<b>E.4 Purchasing and goods in</b>		
E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.	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 internal and external audit. The accompanying documents of incoming FFB from own estate are estate’s weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate’s ticket number is recorded in the mill’s ticket number. For example; Genteng Layang Estate, ticket no. FFB19032094W dated 15/09/19. DO No. 054233, Lorry No. SS5312H, weight: 9850kg. ID: RSPO certified FFB, certificate no. RSPO 652320. For non-certified third party crop, they present their DO to the mill and mill’s issues weighbridge ticket as confirmation of receipt. All 3rd party crops will be put under non-certified portion crop. E.g. sighted FFB D.O# 1684 from Anchor Prospects Sdn Bhd.	Yes
E.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The facilities aware of the procedure to inform CB immediately as written in the documented procedure of Supply Chain and Traceability (Mill) Procedure Manual, Doc. No. SMP-GPB- 23, Rev.09 dated 23/9/2019.	Yes
<b>E.5 Record keeping</b>		

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<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 real-time basis and/ or three-monthly basis.</p>	<p>Balancing of RSPO certified FFB received and deliveries of RSPO certified CPO and PK was base on records of following:</p> <ul style="list-style-type: none"> <li>- Weighbridge tickets</li> <li>- Dispatch of CPO/PK delivery note</li> <li>- Daily Production Report</li> <li>- Mass Balance Worksheet</li> </ul>	<p>Yes</p>
<p>(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.</p>	<p>Based on the Mass Balance Sheet, the volume of CPO and PK has been allocated to both certified and noncertified products.</p>	<p>Yes</p>
<p>c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)</p>	<p>All relevant records related to supply chain available since at least past 2 years. Current records shown positive stock was reported as of the record dated 31/10/2019 for CPO = 2,132.91 mt.</p>	<p>Yes</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 of palm kernel crush since the mill sold its certified product as PK.</p>	<p>Yes</p>

**Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	November 2018	29,137.81	7,878.11	37,115.92
2	December 2018	34,925.48	7,714.87	42,740.35
3	January 2019	27,863.09	7,208.36	35,171.45
4	February 2019	27,046.20	6,328.87	33,475.07
5	March 2019	28,228.45	6,220.77	34,549.22
6	April 2019	25,172.30	4,827.87	30,100.17
7	May 2019	25,322.28	4,509.90	29,932.18
8	June 2019	21,930.30	4,787.21	26,817.51
9	July 2019	22,123.59	4,483.81	26,707.40
10	August 2019	21,528.58	5,107.62	26,736.20
11	September 2019	23,559.10	5,944.96	29,604.06
12	October 2019	27,446.75	6,683.64	34,230.39
Total		314,283.93	71,695.99	385,979.92

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	November 2018	6,011.13	1,471.46
2	December 2018	7,205.13	1,763.74
3	January 2019	5,748.16	1,407.09
4	February 2019	5,579.63	1,365.83
5	March 2019	5,823.53	1,425.54
6	April 2019	5,193.05	1,271.20
7	May 2019	5,223.99	1,278.78
8	June 2019	4,524.22	1,107.48
9	July 2019	4,564.10	1,117.24
10	August 2019	4,441.35	1,087.19
11	September 2019	4,860.24	1,189.73
12	October 2019	5,662.26	1,386.06
Total		64,836.77	15,871.34

**RSPO Public Summary Report**  
**Revision 8 (Mar /2019)**

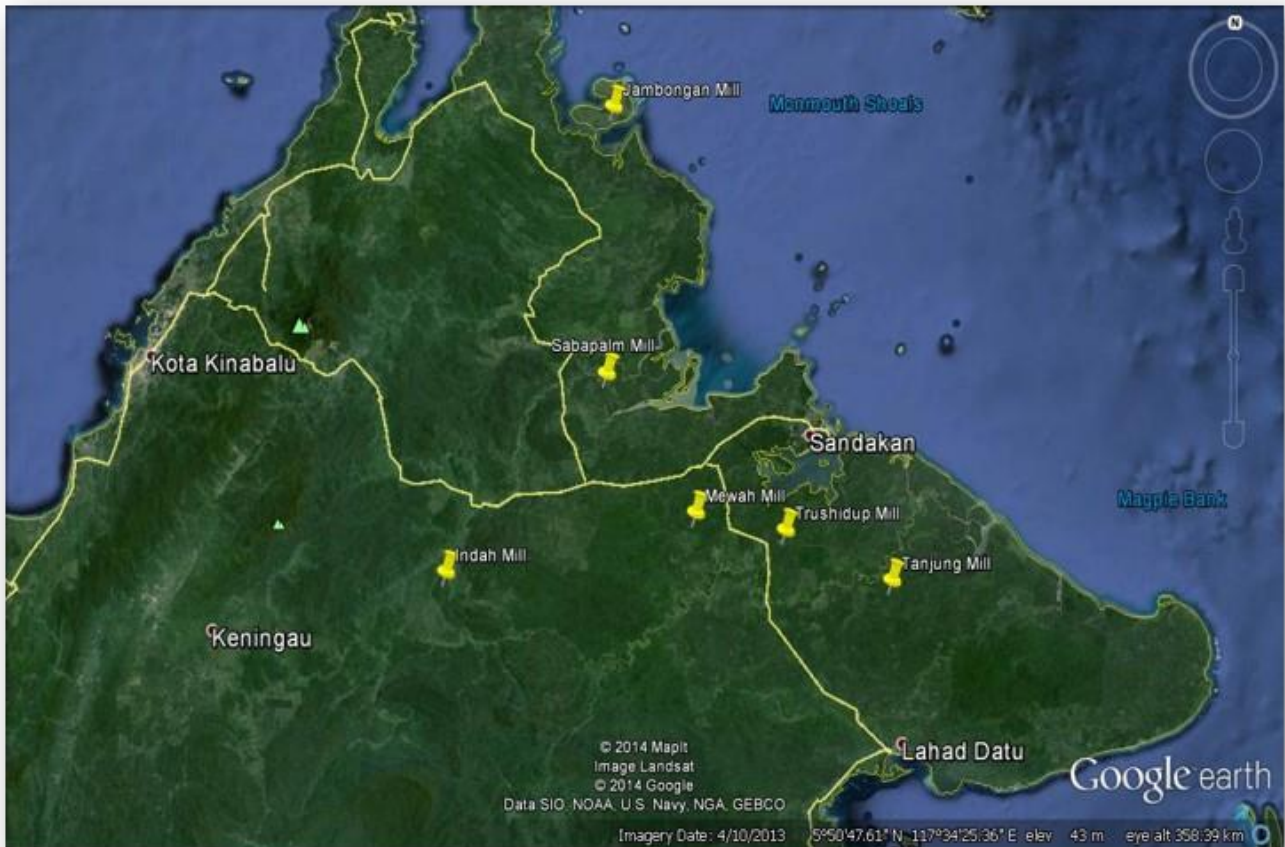
<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	K	RSPO_PO1000001517	-	14,622.60
2	G	RSPO_PO1000005763	4,256.12	-
3	L	RSPO_PO1000006525	-	377.03
Total			4,256.12	14,999.63

<b>D. Records of CPO &amp; PK Sold under other schemes to Buyers since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	G	ISCC	57,858.60	-
Total			57,858.60	-

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

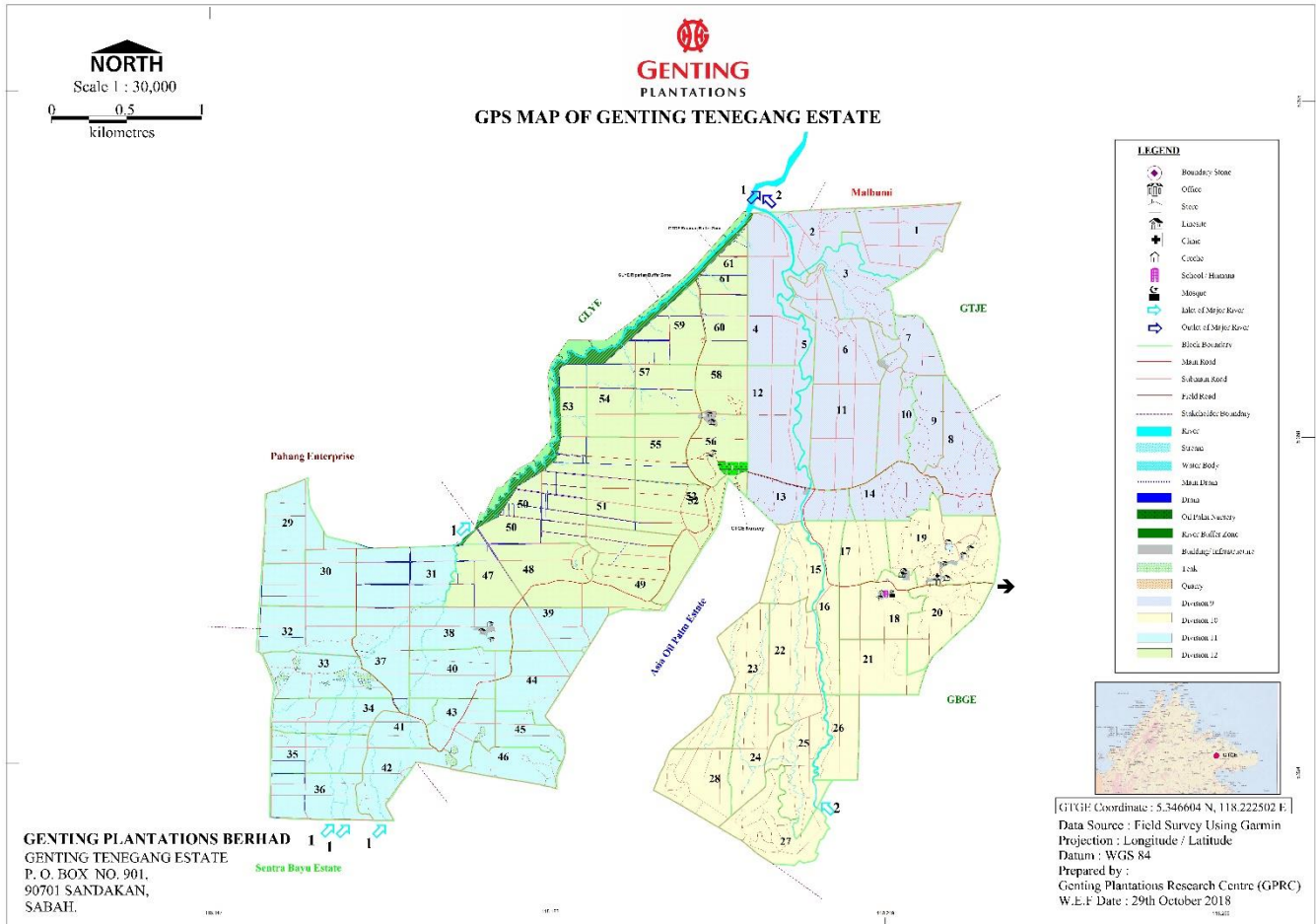
<b>F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)</b>			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
Nil	N/A	N/A	N/A

**Appendix F: Location Map of Genting Tanjung Oil Mill Certification Unit**

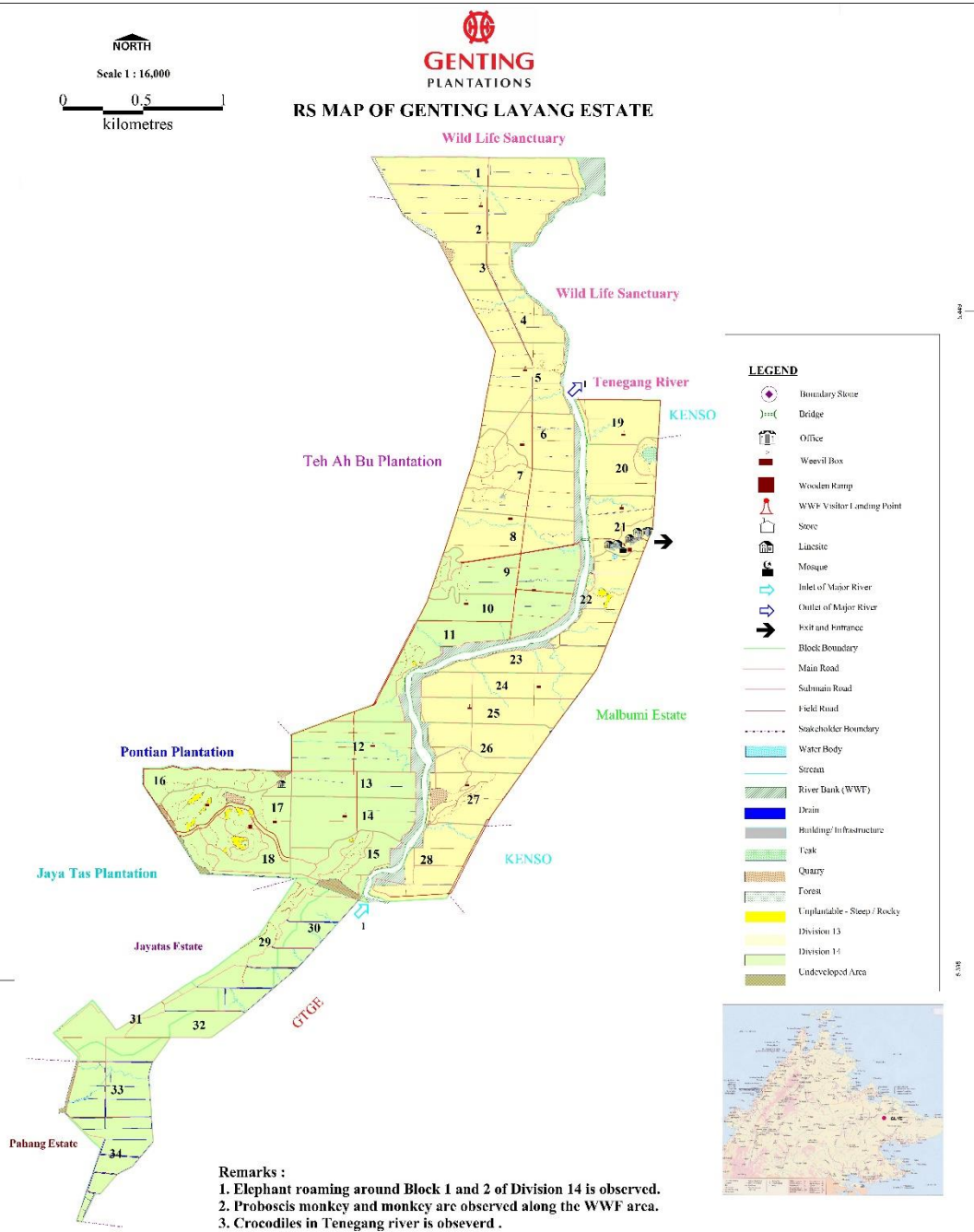




**Appendix G: Genting Tenegang Estate Field Map**



**Appendix H: Genting Layang Estate Field Map**



**GENTING PLANTATIONS BERHAD**  
GENTING LAYANG ESTATE  
P. O. BOX NO. 901,  
90701 SANDAKAN,  
SABAH.  
Date : 15/08/2017

Prepared By :Genting Plantations Research Centre Sabah.

**Appendix I: List of smallholder sampled**

Not Applicable

**Appendix J: List of Abbreviations**

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CLC	Community Learning Centre
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GLYE	Genting Layang Estate
GTGE	Genting Tenegang Estate
GTOM	Genting Tanjung Oil Mill
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