

MSPO Public Summary Report
Revision 2 (Nov 2021)**MALAYSIAN SUSTAINABLE PALM OIL**
MSPO OPMC Public Summary Report

- ☐ Initial Assessment
- ☒ Annual Surveillance Assessment (1_1)
- ☐ Recertification Assessment (Choose an item.)
- ☐ Extension of Scope

FGV HOLDINGS BERHAD	
Client Company (HQ) Address: Sustainability Compliance & Certification Department, Level 20 (W), Wisma FGV, Jalan Raja Laut, 50350 Kuala Lumpur, Malaysia	
Certification Unit: FGV Palm Industries Sdn. Bhd. - Bukit Sagu Palm Oil Mill & Plantations: FGV Plantation (M) Sdn. Bhd. Bukit Sagu 04 Estate FGV Plantation (M) Sdn. Bhd. Bukit Sagu 06 Estate FGV Plantation (M) Sdn. Bhd. Bukit Sagu 07 Estate FGV Plantation (M) Sdn. Bhd. Bukit Sagu 08 Estate	
Date of Final Report: 5/11/2024	

Report prepared by:
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Report Number: 3984724

Assessment Conducted by:
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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	FGV Holdings Berhad		
Mill/Estate	Certification Unit	MPOB License No.	Expiry Date
	Bukit Sagu POM	500202104000	31/03/2025
	Bukit Sagu 04 Estate	558968002000	29/02/2025
	Bukit Sagu 06 Estate	559597002000	31/03/2025
	Bukit Sagu 07 Estate	559045002000	28/02/2025
	Bukit Sagu 08 Estate	558969002000	31/03/2025
Address	Sustainability Compliance & Certification Department, Level 20 (W), Wisma FGV, Jalan Raja Laut, 50350 Kuala Lumpur, Malaysia		
Management Representative	Mr. Ameer Izyanif Bin Hamzah		
Website	https://www.fgvholdings.com/	E-mail	ameer.h@fgvholdings.com
Telephone	+603-2789 1338	Facsimile	+603-2789 0001

1.2 Certification Information			
Certificate Number	Mill: MSPO 700744 Estate: MSPO 700745	Certificate Start Date	24/03/2024
Date of First Certification	24/03/2019	Certificate Expiry Date	23/03/2029
Scope of Certification	<input checked="" type="checkbox"/> Mill: Production of Sustainable Palm Oil and Palm Oil Products <input checked="" type="checkbox"/> Estate: Production of Sustainable Oil Palm Fruits		
Visit Objectives	The objective of the assessment was to conduct an Annual Surveillance Assessment ASA1_1 and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organization's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organization's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.		
Standard	<input type="checkbox"/> MSPO MS 2530-2:2013 – General Principles for Independent Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		
Recertification Assessment Visit (RAV) 1	11/09/2023 - 14/09/2023		
Continuous Assessment Visit Date (CAV) 1_1	09/09/2024 - 12/09/2024		

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Continuous Assessment Visit Date (CAV) 1_2	-
Continuous Assessment Visit Date (CAV) 1_3	-
Continuous Assessment Visit Date (CAV) 1_4	-

1.3 Other Certifications

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 666409	RSPO Principles & Criteria of Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019	BSI Services Malaysia Sdn. Bhd	28/12/2027
MSPO SCCS-TCI-032-2020	MSPO Supply Chain Certification Standard	Trans Certification International Sdn. Bhd.	26/03/2025

1.4 Location of Certification Unit

Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
FGVPISB Bukit Sagu POM	Kilang Sawit Bukit Sagu, 25700 Kuantan, Pahang, Malaysia	3° 58' 10.00" N	103° 8' 51.00" E
FGVPMSB Bukit Sagu 04 Estate	Ladang Felda Bukit Sagu 4, Peti Surat 331, 25470 Kuantan, Pahang, Malaysia	4° 0' 46.00" N	103° 9' 17.00" E
FGVPMSB Bukit Sagu 06 Estate	Ladang Felda Bukit Sagu 6, Peti Surat 451, 25740 Kuantan, Pahang, Malaysia	4° 2' 46.00" N	103° 6' 36.00" E
FGVPMSB Bukit Sagu 07 Estate	Ladang Felda Bukit Sagu 7, Peti Surat 355, 25740 Kuantan, Pahang, Malaysia	3° 59' 29.00" N	103° 6' 10.00" E
FGVPMSB Bukit Sagu 08 Estate	Ladang Felda Bukit Sagu 8, 26130 Kuantan, Pahang, Malaysia	3° 57' 39.00" N	103° 11' 21.00" E

1.5 Certified Area

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
FGVPMSB Bukit Sagu 04	2,799.40	0.00	607.10	3,406.50	82.18
FGVPMSB Bukit Sagu 06	1,497.84	0.00	268.60	1,766.44	84.79
FGVPMSB Bukit Sagu 07	1,830.32	0.00	**374.42	***2,204.74	83.02
FGVPMSB Bukit Sagu 08	1,830.72	*0.00	*402.56	2,233.28	81.97
Total (ha)	7,958.28	0.00	*1,652.68	*9,610.96	

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Notes:

* Previously declared HCV area was part of the 'set aside area' that was conserved as it has potential of HCV1. Reference made from latest HCV Assessment Kompleks Bukit Sagu (August 2024).

** Previously declared conservation area does not include buffer zone area for river.

*** 2,204.74ha = Increase by 6.08 ha and differences due to timber area was not declared during the previous assessment.

1.6 Plantings & Cycle

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
FGVPMSB Bukit Sagu 04	302.77	935.17	1,561.46	0.00	0.00	2,496.63	302.77
FGVPMSB Bukit Sagu 06	0.00	1001.19	496.65	0.00	0.00	1,497.84	0.00
FGVPMSB Bukit Sagu 07	764.44	1,065.88	0.00	0.00	0.00	1,065.88	764.44
FGVPMSB Bukit Sagu 08	117.63	57.42	1,655.67	0.00	0.00	1,713.09	117.63
Total (ha)	1,184.84	3,059.66	3,713.78	0.00	0.00	6,773.44	1,184.84

1.7 Certified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Mar 2023 - Feb 2024)	Actual (Sept 2023 - Aug2024)	Forecast (Mar 2024 - Feb 2025)
FGVPMSB Bukit Sagu 04	44,328.00	36,626.78	36,600.00
FGVPMSB Bukit Sagu 06	23,802.00	18,338.18	20,200.00
FGVPMSB Bukit Sagu 07	13,867.00	8,439.25	12,000.00
FGVPMSB Bukit Sagu 08	33,796.00	24,262.10	28,500.00
Total (mt)	115,793.00	87,666.31	97,300.00

1.8 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Mar 2023 - Feb 2024)	Actual (Sept 2023 - Aug2024)	Forecast (Mar 2024 - Feb 2025)
External FFB Supplier (FELDA/Collection Centre/Smallholders)	215,000.00	115,684.61	93,900.00
Total (mt)	215,000.00	115,684.61	93,900.00

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1.9 Certified Tonnage			
Mill Capacity: 54 MT/hr SCC Model: MB	Estimated (Mar 2023 - Feb 2024)	Actual (Sept 2023 - Aug 2024)	Forecast (Mar 2024 - Feb 2025)
	FFB	FFB	FFB
	115,793.00	87,666.31	97,300.00
	CPO (OER:21.10%)	CPO (OER:20.84%)	CPO (OER:22.03%)
	24,432.32	18,267.44	21,433.00
	PK (KER:5.20%)	PK (KER:5.45%)	PK (KER:5.20%)
	6,021.24	4,776.83	5,060.00

1.10 Actual Sold Volume (CPO)					
CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
18,267.44	405.90	0.00	17,861.54	0.00	18,267.44

1.11 Actual Sold Volume (PK)					
PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
4,776.83	0.00	0.00	4,776.83	0.00	4,776.83

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Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 09-12/09/2024. The audit programme is included as Section 2.4. The approach to the audit was to treat the Bukit Sagu Palm Oil Mill and its supply bases (Bukit Sagu 04 Estate, Bukit Sagu 06 Estate, Bukit Sagu 07 Estate, Bukit Sagu 08 Estate) as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, 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. MS 2530-3:2013 and MS 2530-4:2013 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 Certification Unit were not using MSPO certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSPO Logo and related claims.

The estates or smallholders sample were determined based on formula $S = r\sqrt{n}$ where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula $(r\sqrt{n})$; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix B.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.6.

This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

All the previous nonconformities are remains closed. The assessment findings from the reassessment are detailed in Section 4.2. Major nonconformities were closed offsite due to documentation evidence were sufficient.

This report was externally reviewed by MSPO approved Peer Reviewer prior to certification and recertification decision by BSI. For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Re- Certification)	Year 2 (ASA1_1)	Year 3 (ASA1_2)	Year 4 (ASA1_3)	Year 5 (ASA1_4)
FGVPISB Bukit Sagu POM	✓	✓	✓	✓	✓
FGVPMSB Bukit Sagu 04 Estate	✓	-	✓	-	✓
FGVPMSB Bukit Sagu 06 Estate	✓	-	✓	-	✓
FGVPMSB Bukit Sagu 07 Estate	-	✓	-	✓	-
FGVPMSB Bukit Sagu 08 Estate	-	✓	-	✓	-

Tentative Date of Next Visit: September 8, 2025 - September 11, 2025

Total No. of Mandays: 15 Mandays

2.1 BSI Assessment Team

Team Member Name	Role	Qualifications
Nor Halis Abu Zar (NHA)	Team Leader	<p>Education: Bachelor of Science, Plantation Technology and Management, graduated from UiTM in 2012 and Diploma in Plantation and Industry Management from UiTM in 2009.</p> <p>Work Experience: He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day-to-day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for MS2530:2013 and RSPO Auditor for ENV and OSH and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p>Training attended: He has completed RSPO P&C Lead Auditor Course in Oct 2020, Refresher RSPO P&C Lead Auditor Course in May 2022, RSPO ISH Standard 2019 in December 2021, RSPO SCC 2020 in September 2022, QMS 9001:2015 Lead Auditor Course in April 2019, OSH 45001:2018 Lead Auditor Course in June 2021, IMS (ISO 9001:2015 & ISO 14001:2015) Lead Auditor Course, HCV & HCS Training in August 2022, MSPO 2530:2013 Lead Auditor Course in February 2019, , MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training on May 2021.</p>

		<p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety</p> <p><input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input type="checkbox"/> Environmental</p> <p>Language proficiency:</p> <p>Fluent in both verbal/written Bahasa Malaysia and English Language.</p>
Ahmad Rofi Abu Talib Khan (ARA)	Team Member	<p>Education:</p> <p>Bachelor Degree In Mechanical Engineering from Universiti Teknologi MARA Shah Alam, graduated in 2015.</p> <p>Work Experience:</p> <p>He started his career as Assistant Mill Manager, managing the day-to-day mill operations. In his five years' experience, he has experience handling the certification of ISO 9001, OHSAS 18001, ISO 14001 as well as Malaysia Sustainable Palm Oil (MSPO). Currently working as auditor for palm oil sustainability certifications.</p> <p>Training attended:</p> <p>He has completed CQI – IRCA approved ISO 9001, ISO 14001 and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety</p> <p><input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental</p> <p>Language proficiency:</p> <p>Fluent in both verbal/written Bahasa Malaysia and English Language.</p>
Farrah Sahanim Binti Paduka (FSP)	Team member	<p>Education:</p> <p>Graduated in Bachelor of Science Forestry With Honours (Nature Park and Recreation) at University Malaysia Sabah.</p> <p>Work Experience:</p> <p>Experience in auditing in palm oil industry with more than 4 years. Experience in consulting, internal auditor and Training Management for various program such as MSPO, ISCC and ISO.</p> <p>Training attended:</p> <p>Has undergone training of Integrated Management System (IMS) ISO 9001:2015 and ISO 14001:2015 Lead Auditor Training, Malaysian Sustainable Palm Oil MS2530:2013 Lead Auditor Course, CQI & IRCA Certified ISO 9001:2015 and ISO 45001:2018, RSPO P&C and SA 8000.</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety</p> <p><input type="checkbox"/> Supply chain requirements <input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental</p> <p>Language proficiency:</p> <p>Fluent in both verbal/written Bahasa Malaysia and English Language.</p>

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2.2 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

2.3 Accompanying Persons

No.	Name	Role
	N/A	

2.4 Assessment Plan

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

Date	Time	Subjects	NHA	FSP	ARK
Sunday, 08/09/2024	-	Travelling from Kuala Lumpur to Kuantan	√	√	√
Monday, 09/09/2024 FGVPI Bukit Sagu POM	08:30 - 09:00	Opening Meeting <ul style="list-style-type: none"> Presentation by BSI Lead Auditor - introduction of team member and assessment agenda Confirmation of assessment scope and finalizing audit scope 	√	√	√
	09:00 - 12:30	Mill Assessment: Plant visit, FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	√
	12:30 - 13:30	Lunch break	√	√	√
	13:30 - 16:30	Document review (MS 2530:2013 Part 4): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices.	√	√	√
	16:30 - 17:00	Interim closing meeting	√	√	√

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Tuesday, 10/09/2024 FGVPM Bukit Sagu 07 Estate	09:00 - 12:30	Estate assessment: 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. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
	12:30 - 13:30	Lunch break	√	√	√
	13:30 - 16:30	Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting	√	√	√
	16:30 - 17:00	Interim closing meeting	√	√	√
Wednesday, 11/09/2024 FGVPM Bukit Sagu 07 Estate (NHA) FGVPM Bukit Sagu 08 Estate (FSP & ARK)	09:00 - 12:30	Estate assessment: 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.	√	√	√
	12:30 - 13:30	Lunch break	√	√	√
	13:30 - 16:30	Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices, P7: Development of New Planting	√	√	√
	16:30 - 17:00	Interim closing meeting	√	√	√
Thursday, 12/09/2024 FGVPM Bukit Sagu 08 Estate (NHA & FSP)	09:00 - 12:30	Estate assessment: 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.	√	√	-
	12:30 - 13:30	Lunch break	√	√	-

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Date	Time	Subjects	NHA	FSP	ARK
	13:30 - 16:00	Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices, P7: Development of New Planting	√	√	-
	16:00 - 17:00	Audit Team Discussion and Closing Meeting	√	√	-
Friday 13/09/2024	-	Audit Team Travel Back to Kuala Lumpur	√	√	-

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Section 3: Assessment Findings

3.1 Details of audit results

This assessment has been assessed using the following MSPO normative requirements. The assessment details are provided in Appendix A.

- ☐ MSPO MS 2530-2:2013 – General Principles for Independent Smallholders
- ☒ MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders
- ☒ MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

3.2 Details of Nonconformities and Opportunity for improvement

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

During the assessment there were Two (2) Major & Two (2) Minor nonconformities and Zero (0) OFI raised. The FGV Bukit Sagu POM 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 Non-conformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-Conformity Report			
NCR Ref #:	2546642-202409-M1	Issue Date:	12/09/2024
Due Date:	11/12/2024	Date of Closure:	28/10/2024
Area/Process:	Bukit Sagu POM	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.4.4.2 (b)(e) Major
Requirements:	The occupational safety and health plan should cover the following: b) The risk of all operations shall be assessed and documented. e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.		
Statement of Nonconformity:	FFB Supplier Lorry was not equipped with safety matters & Chemical was stored in drinking bottles.		
Objective Evidence:	During the site visit, it was observed that one lorry used for transporting FFB was operating without a door, which does not comply with the HIRARC dated 29/12/2022, Section 1: "Pergerakan Lori: Lori yang digunakan perlu dalam keadaan selamat untuk digunakan setakat yang praktikal." Additionally, it was noted that an FFB lorry driver was wearing sandals within the mill. This practice does not align with the Procedure Mill Entrance Control dated 14/05/2022, Section 6.1.4: "Pemandu dan orang berkaitan hendaklah memakai PPE		

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	<p>yang lengkap seperti kasut dan topi keselamatan serta pakaian yang sesuai dengan aktiviti kerja di kilang."</p> <p>During the site visit to the workshop area, it was observed that two drinking bottles were being used to store diesel and varnish, which does not comply with the Chemical Handling Procedure dated 14/05/2022, Section 6.5.2: "Dilarang menggunakan bekas makanan dan minuman bagi mengisi bahan kimia."</p> <p>Additionally, at the Water Treatment Plant, it was noted that the chemical Floc was stored in an unlabeled container. This practice is not in line with the Chemical Handling Procedure dated 14/05/2022, Section 6.5.1: "Bahan kimia yang dipindahkan ke bekas lain hendaklah dilabel mengikut label asal bagi mengelakkan kekeliruan kepada petugas lain."</p> <p>This previous Major NC remained open since found non-compliance in the same indicator.</p>
Corrections:	<p>Memo issuance to all drivers that non-compliant lorry and drivers who are not wearing complete PPE are not allowed to enter the mills premises.</p> <p>To ensure all chemical are transferred into an appropriate container and are being labelled as per SOP.</p>
Root cause analysis:	<p>Poor enforcement on PPE compliance and safety regulations among the lorry drivers at the main gate.</p> <p>Lack of understanding of the chemical handling procedures among workers at the workshop and water treatment station.</p>
Corrective Actions:	<p>FELSCO are being trained on PPE compliance and criteria checks for entering the premise. Drivers who failed to comply with the regulation cannot be allowed to enter the mill's premises.</p> <p>To conduct a training on chemical handling procedure to relevant workers.</p>
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> Contractor has been given training title "Taklimat Keselamatan & Kelengkapan Lori BTS" dated 10/10/2024. Sighted evidence of training material, attendance, and photos. MEMO to all lorry driver has been given dated 09/09/2024 by Mill Manager in order to comply with PPE requirement. Awareness training relates to Chemical handling has been given to workers on 09/09/2024. Sighted training material, attendance and photos. <p>The CAP has been implemented; accordingly, thus Major NC was closed on 28/10/2024.</p>

Non-Conformity Report			
NCR Ref #:	2546642-202409-M2	Issue Date:	12/09/2024
Due Date:	11/12/2024	Date of Closure:	28/10/2024
Area/Process:	Bukit Sagu 07 Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.5.11 Major
Requirements:	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers'		

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	Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.
Statement of Nonconformity:	Living quarters area not properly maintained.
Objective Evidence:	<p>During a site visit to housing compound RPT4, it was observed that the surrounding area had not been properly maintained. A pile of garbage, including an old mattress, empty food containers, plastic bottles, and old wires, had been illegally dumped behind the housing area. A weekly housing inspection was conducted in the first week of September by the responsible person, and the issues, such as food scraps, old mattresses, and other waste, were recorded in the Senarai Semak Aktiviti Naziran Penginapan Ladang (Mingguan). However, despite this, the auditor's visit revealed that the problem persisted, and no action had been taken.</p> <p>This issue, initially flagged as a Minor non-compliance in the previous audit, has now been escalated to a Major NC.</p>
Corrections:	Housekeeping the affected area and waste are disposed only in the designated area.
Root cause analysis:	Lack of monitoring by the management on issue that was reported in the line site inspection.
Corrective Actions:	<p>Continuous monitoring by the estate management on issue reported in the weekly housing inspection checklist.</p> <p>Issue is highlighted and discussed during the management-workers meeting.</p>
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> Monitoring by estate management on weekly line site inspection has been conducted during JKH meeting dated 25/09/2024. All matters relate with housing inspection has been discussed and action has been taken if necessary. Sighted minutes of meeting "Jawatankuasa Komunikasi Harmoni" (JKH) Bil 10/2024 and attendance list. <p>The CAP has been implemented; accordingly, thus Major NC was closed on 28/10/2024.</p>

Non-Conformity Report			
NCR Ref #:	2546642-202409-N1	Issue Date:	12/09/2024
Due Date:	Next Assessment	Date of Closure:	Open
Area/Process:	Bukit Sagu POM	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.5.3.2 Minor
Requirements:	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <ol style="list-style-type: none"> Identifying and monitoring sources of waste and pollution. Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. 		
Statement of Nonconformity:	The implementation of the waste management plan is not fully evident.		
Objective Evidence:	The review of the Waste Management Plan highlights that Empty Fruit Bunches (EFB) are identified as waste, with handling methods including selling to external		

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	parties or disposal within the estate. However, during a site visit to the upstream sample point at Sungai Batu, it was observed that old EFB had been dumped along the roadside, which is not in accordance with the management plan. As a result, a minor non-conformance has been raised.
Corrections:	To relocate the EFB dumping along the roadside nearby Sungai Batu and properly dispose as per management plan.
Root cause analysis:	Lack of monitoring by the mill's management on waste management plan.
Corrective Actions:	To establish a regular monitoring on the waste management plan through discussion during the EPMC meeting.
Assessment Conclusion:	The CAP is accepted, further verification will be conducted in the next audit.

Non-Conformity Report			
NCR Ref #:	2546642-202409-N2	Issue Date:	12/09/2024
Due Date:	Next Assessment	Date of Closure:	Open
Area/Process:	Bukit Sagu 08 Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.6.3.2 Minor
Requirements:	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.		
Statement of Nonconformity:	Payment is not being made in timely manner.		
Objective Evidence:	The contractor, Mxxx Bxxxxxx Enterprise, an FFB Transporter, has a contract valid from 01/01/2023 to 31/12/2024. An invoice (No.: 1579) dated 05/02/2024 and a payment voucher (No.: 350471474) confirm that payment was made on 13/03/2024. However, upon reviewing the invoice and payment voucher, a delay in payment was observed. According to the Letter of Award (LOA) dated 22/12/2022, Table 1, Item No. 5 specifies that payment must be made within 30 days upon receipt of the invoice and relevant supporting documents. An interview conducted during stakeholder consultation also confirmed the delay in payment to the contractor.		
Corrections:	Estate management to continuously monitor if there are still payment being affected during the transition period.		
Root cause analysis:	The transition of the new payment system (payment made by SSC) & poor understanding in using the new system has caused the documentation process at the estate level to be delayed.		
Corrective Actions:	Briefing to the staff in charge of the payment and contractors on the new system being implemented in processing the invoice and payment.		
Assessment Conclusion:	The CAP is accepted, further verification will be conducted in the next audit.		

Opportunity For Improvement			
Ref:	N/A	Clause:	N/A
Area/Process:	N/A		
Objective Evidence:	N/A		

Noteworthy Positive Comments	
1.	Good relationship being maintained with surrounding communities and stakeholders.
2.	Good commitment from the management on maintaining the certification.
3.	Good all-in round knowledge in handling the audit.

3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
NCR Ref #:	2391660-202309-M1	Issue Date:	14/09/2023
Due Date:	13/12/2023	Date of Closure:	13/12/2023
Area/Process:	Bukit Sagu 04 Estate & Bukit Sagu 06 Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.4.2 (b) (d) (e) (i) Major
Clause Requirements:	<p>The occupational safety and health plan shall cover the following:</p> <p>b) The risks of all operations shall be assessed and documented.</p> <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance with Occupational Safety Health (Classification Packaging and Labelling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p>		
Statement of Nonconformity:	The occupational safety and health plan was not effectively implemented.		
Objective Evidence:	<p>1. There were lapses in the implementation of the HIRARC at the estate.</p> <p>a. During the visit to the Manuring Gang at FGVM Bukit Sagu 04 Estate, it was found that the manurers were not wearing appropriate PPE, Safety Goggles. This was not in line with the HIRARC for Manuring which states that manurers are required to wear Safety Goggles.</p> <p>b. During the visit to the Fertiliser Store Construction at FGVM Bukit Sagu 04 Estate, it was sighted that Excavator Machinery was being used. Verified the HIRARC stated that control measures available is Machinery Competency License. Nevertheless, there were no evidence of competency license available during the assessment.</p> <p>2. During the visit to the Grass Cutting Operation at FGVM Bukit Sagu 06 Estate, it was identified that Petrol mixed with 2T Oil was stored in a 4 Liter container which had no label. This was not in line with the requirements of USECHH Regulations 2000.</p>		

	<p>3. There were lapses in the monitoring of the First Aid at the estates. Evidence as below.</p> <ol style="list-style-type: none"> During the field visit to the Harvesting Gang at FGVPB Bukit Sagu 04 Estate, it was identified that the First Aid Box handled by the Mandore had expired items, Yellow Lotion (Expired on 07/2023). During the field visit to the FFB Evacuation Gang at FGVPB Bukit Sagu 06 Estate, it was identified that the First Aid Box handled by the Driver had insufficient items, Eye Pad.
Corrections:	<ol style="list-style-type: none"> Mandor and supervisor will be reminded to ensure all workers wear a suitable PPE as per HIRARC. Refresher PPE, chemical handling and First Aid training to be conducted to all workers. Estate management to obtain the complete documentation from contractor. Petrol and 2T container used by grass cutter to be labelled accordingly. Expired and missing items will be replaced with a new one upon delivery of the supplies.
Root cause analysis:	<ol style="list-style-type: none"> Lack of monitoring by supervisor on PPE wearing among workers. Poor cooperation from contractors in providing the required documentation to comply with the requirement. Lack of training and awareness by the worker (grass cutter) regarding safety issues which involved chemical labelling and handling. The first aid box inspection has been conducted by the PIC as per SOP. However, there were delays of supplies in getting the complete items for the first aid box. Lack of awareness by the worker (tractor driver) about the inventory of the First Aid Box.
Corrective Actions:	<ol style="list-style-type: none"> Training evaluation to be conducted post training to evaluate the understanding of the workers. Estate to ensure 'Borang Senarai Semak Permulaan Kerja Kontrak' is fully monitored to ensure complete documentation is obtained from contractor prior the commencement of the work. Frequency of the First Aid Box inspection will be done as per SOP. All details found during inspection will be recorded in detail.
Assessment Conclusion:	<p>CAP has been accepted with evidence verified as following:</p> <ol style="list-style-type: none"> Records of competence operator training of excavator. Records of workers' PPE, first aid and chemical handling training dated 12/09/2023 (Bukit Sagu 04 Estate), 19/11/2023 and 21/11/2023 (Bukit Sagu 06 Estate). Records of grass-cutting contractor OSH & Environmental compliance training dated 12/09/2023. Records of Borang Senarai Semak Permulaan Kerja Kontrak for month of September – November 2023. Photos of petrol container have been labelled. Photos of Eye Pad have been added to the First Aid box.

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	The evidence of corrections and corrective actions were found to be effective to address the non-conformity. Hence, Major NC is closed on 13/12/2023. Continuous effective implementation of the corrective action shall be verified in the next assessment visit.
Verification Statement:	Sighted training has been conducted on PPE, Chemical Handling and First Aid. Sighted evidence of training material, attendance, photos with training evaluation. Based on site visit, PPE usage was effectively implemented. First Aid box was inspected and found equipped as per list of items. Thus, Major NC was remained closed.

Non-Conformity Report			
NCR Ref #:	2391660-202309-M2	Issue Date:	14/09/2023
Due Date:	13/12/2023	Date of Closure:	13/12/2023
Area/Process:	Bukit Sagu POM	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.4.4.2 (b) Major
Clause Requirements:	The occupational safety and health plan shall cover the following: b) The risks of all operations shall be assessed and documented.		
Statement of Nonconformity:	The Audiometric Retest was not conducted within the 3 months as required under Noise Regulations 2019.		
Objective Evidence:	Audiometric Assessment was conducted on 16/12/2022 – 28/02/2023 for a total of 55 workers by Klinik Syed Badaruddin Sdn Bhd and the Audiometric Test Report was available for verification. The results indicated that 17 workers were diagnosed with STS and required to undergo retest by 28/05/2023. Nevertheless, the Audiometric Retest was conducted on 01/08/2023, exceeded the 3 months as required by the Noise Regulation.		
Corrections:	Mill's management to follow up on the test result and adhere to the recommendation given by the OHD (if any).		
Root cause analysis:	Lack of monitoring by the personnel in charge for legal monitoring in ensuring the examination to be carried in timely manners.		
Corrective Actions:	Audiometric test (including retest and medical examination) will be included as part of the monitored items in the list of 'Rekod Pemantauan Lesen & Permit' at the mill.		
Assessment Conclusion:	CAP has been accepted with evidence verified as following: <ol style="list-style-type: none"> Letter of appointment dated 23/08/2023 of Assistant Mill Manager as legal compliance monitoring PIC. Records and photos of monitoring notice board included with due of audiometric retest dated on 13/01/2024. Records of compliance monitoring table (Safety Legal Compliance Monitoring) with plan and actual conducted for month of September – November 2023. Audiometric test (including retest and medical examination) has been included as part of the monitored items in the list of 'Rekod Pemantauan Lesen & Permit' at the mill. Refer Monitoring record FY 2024. The evidence of corrections and corrective actions were found to be effective to address the non-conformity. Hence, Major NC is closed on 13/12/2023. Continuous		

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	effective implementation of the corrective action shall be verified in the next assessment visit.
Verification Statement:	The major NC remains open due to found nonconformity in the same indicator. Refer 2546642-202409-M1

Non-Conformity Report			
NCR Ref #:	2391660-202309-N1	Issue Date:	14/09/2023
Due Date:	Next Surveillance	Date of Closure:	12/09/2024
Area/Process:	Bukit Sagu 06 Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.5.11 Minor
Clause Requirements:	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.		
Statement of Nonconformity:	Living quarters area not fully in compliance with the specified requirements.		
Objective Evidence:	<p>Site visit to housing compound house number 78/93 and 79/93 in FGVPB Bukit Sagu 06 Estate found that housing has not been properly maintained. Sighted</p> <ol style="list-style-type: none"> 1. Used PPE (nitrile glove and respirator) 2. Overdue grass cutting 3. Improper waste management 4. Broken ceiling <p>It also has not been highlighted during latest housing inspection in the document "Senarai Semak Aktiviti Naziran Penginapan Ladang (Mingguan)"</p>		
Corrections:	<ol style="list-style-type: none"> 1. Used PPE have been disposed accordingly as per SOP (refer appendix 2A). 2. Grass cutting activity have been done in the area surrounding house number 78/93 and 79/93 (refer appendix 2B). 3. Communal work which includes drain cleaning, grass cutting, and other housekeeping activity have been done on 13/9/2023 (refer appendix 2C). 4. Broken ceiling has been repaired on 21/9/2023 (refer appendix 2D). 5. Latest document of 'Senarai Semak Aktiviti Naziran Penginapan Ladang (Mingguan)' have been reviewed and attached (Refer Appendix 2E) after correction and improvement actions have been done to the house No 78/93 & 79/93. 		
Root cause analysis:	Lack of monitoring by the personnel in charge for legal monitoring in ensuring the examination to be carried in timely manners.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Training & awareness programme will be done to all workers on PPE and waste management. 2. New grass cutting schedule will be implemented to ensure the activity will never be behind schedule. 3. Communal activity will be done monthly to ensure no housekeeping issue will occur in the future. 		

	4. Weekly monitoring using 'Senarai Semak Aktiviti Naziran Penginapan Ladang (Mingguan)' have been practices and will be continued.
Assessment Conclusion:	During a site visit to housing compound RPT4, it was observed that the surrounding area had not been properly maintained. A pile of garbage, including an old mattress, empty food containers, plastic bottles, and old wires, had been illegally dumped behind the housing area. A weekly housing inspection was conducted in the first week of September by the responsible person, and the issues, such as food scraps, old mattresses, and other waste, were recorded in the Senarai Semak Aktiviti Naziran Penginapan Ladang (Mingguan). However, despite this, the auditor's visit revealed that the problem persisted, and no action had been taken. This issue, initially flagged as a Minor non-compliance in the previous audit, has now been escalated to a Major NC.
Verification Statement:	Based on site conducted revealed that the problem persisted, and no action had been taken. This issue, initially flagged as a Minor non-compliance in the previous audit, has now been escalated to a Major NC.

Opportunity For Improvement			
Ref:	2391660-202309-I1	Clause:	MSPO 2530 Part 3: 4.5.3.3
Area/Process:	FGVPMSB Bukit Sagu 04 Estate & FGVPMSB Bukit Sagu 06 Estate		
Objective Evidence:	Maintenance of records related to SW305 and SW410 collected by the vendor i.e. Tixxxx Macxxxxxx Parts Sdn Bhd located in Gambang Pahang and Kubota Malaysia Sdn Bhd upon completion of vehicles/machinery servicing in the SW could be improved further.		
Verification Statement:	The latest disposal of Schedule Waste on 04/09/2024. Refer the Consignment Note Ref No: 2024090410J1KOQC for SW409 and Ref No: 2024080915H4LDCW for SW201. Disposal was made through J&T Berjxxxx Alxx Murxx Sdn Bhd Verification of the disposal records from the contractor is well documented in the estate. SW305 and SW306 records from the contractor disposal were recorded.		

3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
2391660-202309-M1	MSPO Part 3: 4.4.4.2(b)(d)(e)(i) (Major)	14/09/2023	Closed on 13/12/2023
2391660-202309-M2	MSPO Part 4: 4.4.4.2 (b) (Major)	14/09/2023	Closed on 13/12/2023
2391660-202309-N1	MSPO Part 3: 4.4.5.11 (Minor)	14/09/2023	Escalated to Major NC (2546642-202409-M2)
2546642-202409-M1	MSPO Part 4: 4.4.4.2 (b)(e)	12/09/2024	Closed on 28/10/2024
2546642-202409-M2	MSPO Part 3: 4.4.5.11	12/09/2024	Closed on 28/10/2024
2546642-202409-N1	MSPO Part 4: 4.5.3.2	12/09/2024	Open
2546642-202409-N2	MSPO Part 3: 4.6.3.2	12/09/2024	Open

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3.5 Issues Raised by Stakeholders

IS #	Description
1	<p>Feedbacks: Teachers (Sk. Bukit Sagu 1 and Sk. Bukit Sagu 2)</p> <p>They has been a teacher at Sk. Bukit Sagu 1 and Sk. Bukit Sagu 2 respectively. According to them, there are around more than 200 estate's students at the school and the estate has a good relationship where the estate has contributed the use of machinery such as GCB for the gotong-royong purposed. The parents that work in the estate has also has a very good commitment toward their children's academic achievement. There is no estate's activity that affecting the school.</p> <p>Management Responses: Will keep maintaining the good practise and will improve further in giving support to all stakeholders.</p> <p>Audit Team Findings: No further issue.</p>
2	<p>Feedbacks: Contractor (Mxxx Bxxxxxx Exxxxxxxxxx)</p> <p>Interview with the representative, the estate management and the contractor has a very good relationship between both parties. The estate has also given briefing to the contractor before starting their services in the estate. The contractor has also provided PPE and conducted the NRA to their workers as per requirement from the estate management. According to the contractor, tendering process will be made at the Wilayah and payment process will be issue by the HQ. However, the contractor has informed there is few times of delay of payment received from the HQ.</p> <p>Management Responses: According to the management, delay payment received due to transition of system by the HQ which was detected on early of this year.</p> <p>Audit Team Findings: Issued has been raised in clause 4.6.3.2.</p>
3	<p>Issue: Secretary KKD (Kelab Keluarga Daya Budi An-Nur)</p> <p>During the stakeholder meeting, it was informed by the representative that there is no harassment has happened in the estate premise. Any issues or complaint received will be discuss in gender committee meeting without prejudice. Regular meetings between the estate management and KKD committee are conducted to address any matter arising from the workers during the Jawatankuasa Harmoni Meeting (JKH) that was conducted every once a month. Worker's welfare including housing, salary payment and benefit are well taken care of by the estate management.</p> <p>Management Responses: Will keep the good practise, all workers are asset to the company, and they will be taken care.</p> <p>Audit Team Findings: No further issue.</p>

3.6 List of Stakeholders Contacted



<p>Government Officer:</p> <p>Teacher at Sk. Bukit Sagu 1</p> <p>Teacher at Sk. Bukit Sagu 2</p>	<p>Community/neighbouring village:</p> <p>1. Kelab Daya Budi Annur</p> <p>2. Kelab Daya Budi Sri Anggun</p>
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Suppliers/Contractors/Vendors: Mxxx Bxxxxxx Exxxxxxxxxx	Worker's Representative/Gender Committee: 1. Worker's representative
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Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment FGV Bukit Sagu POM Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013 . It is recommended that the certification of FGV Bukit Sagu POM Certification Unit is continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: NOROLSAIFUL HAZRI BIN HAMID	Name: NOR HALIS ABU ZAR
Company name: FGV HOLDINGS BERHAD	Company name: BSI SERVICES MALAYSIA SDN BHD
Title: GENERAL MANAGER, SUSTAINABILITY	Title: CLIENT MANAGER
Signature:  Date: 28 OCT. 2024	Signature:  Date: 28/10/2024

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Appendix A: Summary of the findings by Principles and Criteria

MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Oil Palm Plantations and Organized Smallholders

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	<p>FGV Holdings Berhad has implemented a Group Sustainability Policy (Policy No.: FGV/GSD/POL/03 Rev. 05 dated 26/02/2024. The policy aims to define the objectives and guidelines for FGV Holdings Berhad and its Group of Companies (collectively referred to as the "FGV Group" or "Group") to meet FGV's sustainability commitments.</p> <p>Specifically, for MSPO (Malaysian Sustainable Palm Oil), there is a dedicated Policy Statement for Sustainability Certification Scheme (Doc. # FGV/SED/POL/003; Rev. 3.0), which encompasses all sustainability certifications undertaken by the company, including MSPO. This statement was signed by Mohd. Nazrul Izam Mansor, Group Chief Executive Officer, on 26/01/2022, and outlines FGV's commitment to complying with the requirements of UDHR, ILO, UNGP, SDG, and NDPE.</p> <p>A sample communication of the policy was observed during a morning assembly at sampled estates, where management briefed workers on the policy.</p>	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	<p>Clause 5.0 mentioned policy emphasizes that the company will continuously strive to improve the quality of its products and services. This will be achieved by adopting the best possible approaches to enhance productivity and profitability, optimizing resource use, and improving operational efficiencies. Additionally, the company is</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		committed to eliminating or minimizing any negative impacts on people and the environment.	
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	<p>The Internal Audit for Sustainability Certification Procedure (SOP No.: FGV/GSD-SCCD/SOP/04, dated 03/09/2020) has been established, covering internal audits for both sustainability certifications and MSPO. According to the procedure, internal audits must be carried out annually and prior to the Management Review. It was verified that both sampled estates have adhered to the procedure by conducting yearly internal audits, with records available for verification as outlined below.</p> <p><u>Bukit Sagu 07 Estate</u></p> <p>MSPO Internal Audit was conducted on 12-13/08/2024 by Sustainability, Compliance and Certification Department. The Internal Audit Report was available for verification. There is 17 NC has been raised. The root cause was identified, and the corrections and corrective action plans were implemented and closed.</p> <p><u>Bukit Sagu 08 Estate</u></p> <p>MSPO Internal Audit was conducted on 14-15/08/2024 by Sustainability, Compliance and Certification Department. The Internal Audit Report was available for verification. There is 15 NC has been raised. The root cause was identified, and the corrections and corrective action plans were implemented and closed.</p>	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to	Internal Audit for Sustainability Certification Procedure (SOP No.: FGV/GSD-SCCD/SOP/04 dated 03/09/2020) has been established. The procedure covers the internal audit for MSPO as well and states that	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	implement the necessary corrective action. - Major compliance -	the internal audit is to be conducted annually and before the management Review. <u>Bukit Sagu 07 Estate</u> MSPO Internal Audit was conducted on 12-13/08/2024 by Sustainability, Compliance and Certification Department. The Internal Audit Report was available for verification. There is 17 NC has been raised. The root cause was identified, and the corrections and corrective action plans were implemented and closed. <u>Bukit Sagu 08 Estate</u> MSPO Internal Audit was conducted on 14-15/08/2024 by Sustainability, Compliance and Certification Department. The Internal Audit Report was available for verification. There is 15 NC has been raised. The root cause was identified, and the corrections and corrective action plans were implemented and closed.	
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	The internal audit report was documented and made available for management review. As evidence, all findings from internal audit were responded by Estate Management within the acceptable timeframe.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	FGVPISB Bukit Sagu Complex conducted management review meeting with minutes and attendances available for review. The meeting was chaired by the Estate Managers and attended by key personnel. Verified the Management Review Meeting Minutes as below. <ul style="list-style-type: none"> Bukit Sagu 07 Estate: 22/08/2024 Bukit Sagu 08 Estate: 22/08/2024 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>The agenda discussed during the meeting as follows:</p> <ol style="list-style-type: none"> 1. MSPO and RSPO Principle and Criteria findings 2. Customer feedbacks 3. Process performance and product conformity 4. Environmental Impact 5. Social Impact 6. Replanting 7. Improvement of the effectiveness of the management system and process 8. Resource needs 	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	<p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p>- Major compliance -</p>	<p>Continual Improvement for FY 2024 established and documented covering environment, social and economic issues. Among program included:</p> <ol style="list-style-type: none"> 1. Zero Open Burning 2. Reduce the chemical usage 3. Establishment of workers committee 4. Usage of harvesting machine 5. Planting of beneficial plant 6. Effective usage of papers 7. Communities' activity among workers and settlers 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. - Major compliance -	Bukit Sagu 07 and Bukit Sagu 08 Estate has established Continual Improvement Plan for 2024 and approved by Estate Manager. Among target set for achieving continual improvement included: <ul style="list-style-type: none"> • Social: Increase frequency of meeting for discussing workers welfare. • Reduce use of pesticides and alternative for safer type. • Use of mechanisation for harvesting. • Achieving target base on annual budget. 	Complied
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	Training to workers in aspects of good agriculture practices in plantation management were conducted throughout the year. As evidence, sighted the training program for year 2024. The management has kept records of information related to new technology and system. An action plan to provide the necessary resources including training to implement the new techniques or new industry standard or technology adequately sighted. Sample of the records of information sighted is as following: <ol style="list-style-type: none"> 1. To conduct meeting worker welfare every 3 month. 2. Monitoring and conduct awareness program to ensure zero burning practise. 3. To ensure soil moisture content in good range. 4. Reduce amount of pesticides usage. 5. To apply EFB in field. 6. To monitored labour quarters and to ensure zero burning. 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	<p>The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p><u>All sample estates</u></p> <p>The FGV management under the SCC Department has updated the stakeholder communication SOP. The latest SOP FGV/FGVPM/11/IMS/15/006 VISON 2 is dated 1/11/2021, pages 1 to 7. The established communication procedure was adopted by the entire management of the FGVPM Ladang Bukit Sagu Complex. All the audited estates have never imposed any limits on the distribution of available MSPO information sought by stakeholders. However, it was constrained by commercial secrecy and disclosure issues that could have had detrimental environmental or societal consequences.</p> <p>There was also evidence of a flowchart for the complaint and grievance procedures. In response to any communication request from a stakeholder, the procedure serves as a guideline for entire estates in the FGVPM Ladang Bukit Sagu Complex. The procedure establishes the scope and methods for interacting with internal and external stakeholders, saying that relevant stakeholders should be provided with information in the appropriate languages and formats. Referring to the list of stakeholders, there is information regarding the names, addresses, and telephone numbers of contractors, suppliers, government agencies, and other entities surrounding the school. All the visited estates have conducted the latest communication with relevant stakeholder groups. The stakeholder's information has been conveyed to stakeholders in formal meetings and briefings. The various issues that were discussed and communicated included the implementation of MSPO certification, domestic waste management,</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		open burning, and the purpose of sustainability policies. The minutes of the meeting and the attendance list were seen.	
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance -	<p><u>All sample estates</u></p> <p>The estate management issued a memo dated 12/07/2024 on the list of documents that are publicly available upon requested by the stakeholders. List of documents that made publicly available as below:</p> <ul style="list-style-type: none"> - Land title - OSH plan - Environmental and social management plan - SEIA report - HCV report - Complaint and grievance procedure - Land dispute procedure - Policies such as Human Rights and Group Sustainability Policy - Assessment report of audits - etc. <p>Besides, documents such as company's policies, Supplier Code of Conduct and grievance procedure is accessible by the stakeholders via company's website: Policies & Guidelines - FGV Holdings Berhad.</p>	Complied
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	<p><u>All sample estates</u></p> <p>The FGVP has established the procedure for consultation and communication with the relevant stakeholder. The procedure of Komunikasi, Penglibatan dan Rundingan; SOP No.:</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		FGV/FGVPM/II/IMS/15/006; version no. 2, effective date 01/11/2021 is available and cover for all staffs and workers, customers, and stakeholders as per stated in the clause 2.0	
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance -	<u>Bukit Sagu 07 Estate</u> The estate management has appointed Mr. Mohd Solihuddin Bin Yaakob (assistant manager) as the officer of communication and social on 10/01/2024. Letter of appointment, ref: (01/RSPO/629/P1,P6 and was appointed by the estate manager, Mr. Mohd Noor Bin Abdul Sani. <u>Bukit Sagu 08 Estate</u> The estate management has appointed Mr. Mohd Azri bon Khasim as the officer of communication and social on 02/06/2024. Letter of appointment, ref: (12)FGVPM/RSPO/629/6-1-06 and was appointed by the estate manager, Mr. Mohd Shuhry Bin Dollah.	Complied
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	<u>All sample estates</u> Latest Stakeholder Meeting as per Minutes of Meeting records of Laporan Program Konsultasi Bersama Pihak Berkepentingan Mengenai Komitmen Kelestarian FGV; Kompleks Bukit Sagu, Kompleks Panching & Kompleks Neram; Date: 05/09/2023; Venue @ Dewan Auditorium Akademi Latihan FGV (ALAF), Jalan Bukit Kuantan, 26050 Kuantan, Pahang. <u>Bukit Sagu 07 Estate</u> Stakeholder list was established that include the FFB suppliers, local authorities, contractors and suppliers. Sighted the document of Senarai Status Stakeholder Dalaman Dan Luaran, updated 07/06/2024. <u>Bukit Sagu 08 Estate</u>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Stakeholder list was established that include the FFB suppliers, local authorities, contractors and suppliers. Sighted the document of Senarai Status Stakeholder Dalam Dan Luaran, updated 22/08/2024.	
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance -	FGV Holdings Berhad has developed the MSPO Supply Chain Certification (Kilang Sawit) procedure, documented as SOP Number: FGV/GSD-SCCD/SOP/006, dated 07/01/2021. Section 6.8 of the procedure addresses Traceability for documents and products. The objective of this procedure is to provide guidelines for the mill to establish and ensure the effective implementation of a sustainable supply chain and traceability for certified sustainable materials, including FFB (Fresh Fruit Bunches), CPO (Crude Palm Oil), and PK (Palm Kernel).	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Compliance with the traceability system is inspected daily. The weighbridge operator inputs all relevant data into the system, which is then verified by the executive at the end of the day. Weighbridge records and FFB delivery notes for incoming FFB and outgoing CPO and PK from the mill were reviewed. A Traceability Audit was conducted during internal audit by the Sustainability, Compliance, and Certification Department. The Audit Report is available for verification.	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The Assistant Manager of sample estates was appointed as the person in charge of Traceability, as confirmed in the appointment letter signed by the Manager. The job functions outlined in the letter specify that	Complied

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Criterion / Indicator		Assessment Findings	Compliance																														
		the appointed individual is responsible for managing traceability within the mill.																															
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	<p>The FFB weighbridge ticket and despatch notes are generated for all transactions to Ayer Item Palm Oil Mill. This set of documents includes the following information, among others, as verified through a sample as below:</p> <p>Bukit Sagu 07 Estate</p> <table><tr><td></td><td>Sample 1</td><td>Sample 2</td></tr><tr><td>Date</td><td>18/06/2024</td><td>20/07/2024</td></tr><tr><td>Lorry No</td><td>VFKXXXX</td><td>VDMXXXX</td></tr><tr><td>Ticket No</td><td>0105147</td><td>0102197</td></tr><tr><td>Weight</td><td>6.28 MT</td><td>6.44 MT</td></tr></table> <p>Bukit Sagu 08 Estate</p> <table><tr><td></td><td>Sample 1</td><td>Sample 2</td></tr><tr><td>Date</td><td>31/08/2024</td><td>29/06/2024</td></tr><tr><td>Lorry No</td><td>CBNXXXX</td><td>VECXXXX</td></tr><tr><td>Ticket No</td><td>0779XXX</td><td>0779XXX</td></tr><tr><td>Weight</td><td>6.72 MT</td><td>6.57 MT</td></tr></table>		Sample 1	Sample 2	Date	18/06/2024	20/07/2024	Lorry No	VFKXXXX	VDMXXXX	Ticket No	0105147	0102197	Weight	6.28 MT	6.44 MT		Sample 1	Sample 2	Date	31/08/2024	29/06/2024	Lorry No	CBNXXXX	VECXXXX	Ticket No	0779XXX	0779XXX	Weight	6.72 MT	6.57 MT	Complied
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4.3 Principle 3: Compliance to legal requirements																																	
Criterion 4.3.1 – Regulatory requirements																																	
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	The legal compliance of FGVPM Bukit Sagu Complex unit were monitored by the management to ensure compliance to all applicable legal requirements. Sample of legal requirements were verified at the estate and the mill. Licenses and Permits were renewed and remained	Complied																														

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Criterion / Indicator		Assessment Findings	Compliance
		<p>active at the time of the assessments. Among the License and Permits sampled as below.</p> <p><u>Bukit Sagu 07 Estate</u></p> <ul style="list-style-type: none"> • MPOB License #559045002000 valid from 01/03/2024 until 28/02/2025 • Weighbridge calibration #B326407 inspected by De Metrology dated 10/01/2024 • Diesel permit #C003268 valid until 11/10/2024 • Petrol permit #C000656 valid until 29/11/2024 <p><u>Bukit Sagu 08 Estate</u></p> <ul style="list-style-type: none"> • MPOB License #558969002000 valid from 01/03/2024 until 28/02/2025 • Petrol permit #PK/2024/P/C-000307 valid until 17/06/2025 • Diesel permit #PBKB/2024/P/C-000086 valid until 02/05/2027 	
4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>FGV Holdings Berhad has introduced a centralized system for tracking legal changes, detailed in the "SOP Perundangan Kelestarian, No: FGV/GSD-SR/SOP/16 dated 28/06/2022". Updates to relevant regulations are overseen by the Sustainability, Compliance, and Certification Department, in collaboration with the Operating Units. Refer "Senarai rujukan Akta Dan Daftar Perundangan" updated on 30/08/2024. All legal requirements are documented in the Legal and Other Requirement Register, which is maintained at the mill. This register is routinely reviewed and updated whenever new or amended legal requirements affect estates operations.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	FGV Holdings Berhad has introduced a centralized system for tracking legal changes, detailed in the " SOP Perundangan Kelestarian, No: FGV/GSD-SR/SOP/16 dated 28/06/2022. Updates to relevant regulations are overseen by the Sustainability, Compliance, and Certification Department, in collaboration with the Operating Units. Refer "Senarai rujukan Akta Dan Daftar Perundangan" updated on 30/08/2024. All legal requirements are documented in the Legal and Other Requirement Register, which is maintained at the mill. This register is routinely reviewed and updated whenever new or amended legal requirements affect estates operations.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance -	The tracking system for identifying changes in relevant regulations is available through the head office and website, with updates communicated from the Group Head Office. On-site verification, including interviews with office personnel and a review of records, confirms that the system is suitable for the operations and is well implemented. Assistant Manager for both sample estates was appointed as the Person in Charge for Legal Compliance, as outlined in the appointment letter signed by the Estate Manager. His job responsibilities include ensuring compliance with legal requirements within the mill.	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	<u>Bukit Sagu 07</u> There was no evidence that the oil palm cultivation activities are diminishing the land use rights of other users. Oil palm cultivation activities at the audited estates were operated within the verified land title boundary. Samples of land title are as follows.	Complied

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Criterion / Indicator		Assessment Findings				Compliance											
		<table><tr><td>Estate</td><td>Land Title</td><td>No Lot</td><td>Area (ha)</td></tr><tr><td rowspan="3">FGV Bukit Sagu 07</td><td>HS(D) 17XXX</td><td>PTD 1119</td><td>1162.46</td></tr><tr><td>HS(D) 17XXX</td><td>PTD 1115</td><td>558.28</td></tr><tr><td>HS(D) 17XXX</td><td>PTD 1171</td><td>82.99</td></tr></table> <p>As per page 2/2 of the land title, <i>Hakmilik Sementara (Borang 11AK)</i>, the land is registered under Lembaga Kemajuan Tanah Persekutuan and sub-leased to Felda Global Ventures Plantations (Malaysia) Sdn Bhd. The subleased property located at FGV Bukit Sagu 07 expires on the 22/06/2097. All the 5 land titles at the audited estates are limited to the cultivation of oil palm.</p> <p>The above tabulations have disclosed the audited estates activities have not diminished the land use rights on its condition (<i>Syarat Nyata</i>) as verified during site visits. Substantiated that the legal documents such as land titles, quit rent receipts 2024 and MPOB licenses are in correlations with the statutory requirement.</p> <p><u>Bukit Sagu 08</u></p> <p>Sighted the lease agreement dated 01/11/2011 between Felda and Fgv, commence on 01/01/2012 with validity 99 years from the commencement date (clause 2.5 (a) Lease Term)</p>	Estate	Land Title	No Lot	Area (ha)	FGV Bukit Sagu 07	HS(D) 17XXX	PTD 1119	1162.46	HS(D) 17XXX	PTD 1115	558.28	HS(D) 17XXX	PTD 1171	82.99	
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	HS(D) 17XXX	PTD 1171	82.99														
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	<p><u>Bukit Sagu 07</u></p> <p>Oil palm cultivation activities at the audited estates were operated within the verified land title boundary. The FGV management provided land title documents of estates which were named after Felda and leasing agreement with Felda showing legal ownership of FGV during the assessment as following.</p> <table><tr><td>Estate</td><td>Land Title</td><td>No Lot</td><td>Area (ha)</td></tr><tr><td>FGV Bukit Sagu 07</td><td>HS(D) 17XXX</td><td>PTD 1119</td><td>1162.46</td></tr></table>	Estate	Land Title	No Lot	Area (ha)	FGV Bukit Sagu 07	HS(D) 17XXX	PTD 1119	1162.46	Complied						
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Criterion / Indicator		Assessment Findings				Compliance
			HS(D) 17XXX	PTD 1115	558.28	
			HS(D) 17XXX	PTD 1171	82.99	
		<p>As per page 2/2 of the land title, <i>Hakmilik Sementara (Borang 11AK)</i>, the land is registered under Lembaga Kemajuan Tanah Persekutuan and sub-leased to Felda Global Ventures Plantations (Malaysia) Sdn Bhd. The subleased property located at FGV Bukit Sagu 07 expires on the 22/06/2097. All the 5 land titles at the audited estates are limited to the cultivation of oil palm.</p> <p>The above tabulations have disclosed the audited estates activities have not diminished the land use rights on its condition (<i>Syarat Nyata</i>) as verified during site visits. Substantiated that the legal documents such as land titles, quit rent receipts 2024 and MPOB licenses are in correlations with the statutory requirement.</p> <p><u>Bukit Sagu 08</u></p> <p>Sighted the lease agreement dated 01/11/2011 between Felda and FGV, commence on 01/01/2012 with validity 99 years from the commencement date (clause 2.5 (a) Lease Term)</p>				
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	<p>The estates have maintained boundary demarcation using boundary stone. Seen the record of Monitoring of Boundary Stones available in estates visited.</p> <p><u>Bukit Sagu 07 Estate</u></p> <p>Site visit at PM19E and PM18D verified that the estate has established the boundary markers with trenches and boundary stone.</p> <p><u>Bukit Sagu 08 Estate</u></p> <p>Site visit at PM06 verified that the estate has established proper boundary with trenches and boundary stone is available. The boundary</p>				Complied

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Criterion / Indicator		Assessment Findings	Compliance
		with Bukit Kuantan Forest Reserve. Signages of no hunting and open burning is available at site.	
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	No land disputes have been reported since the last assessment. In the event of any such dispute arising, the case will be managed in accordance with the procedures developed.	N/A
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land or negotiated agreements at all the sampled estates.	N/A
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. - Minor compliance -	There is no customary land or negotiated agreements at all the sampled estates.	N/A
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There is no customary land or negotiated agreements at all the sampled estates.	N/A
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			

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Criterion / Indicator		Assessment Findings	Compliance
4.4.1.1	<p>Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.</p> <p>- Minor compliance -</p>	<p><u>All Sample estate</u></p> <p>Assessment was based on the SIA Guidance; SOP No: FGV/GSD-SCCD/GL/02, Version: 0.0, effective date: 08/03/2021. There was a Social Impact Assessment (SIA) for Bukit Sagu Complex consist of FGVPI Bukit Sagu Palm Oil Mill, FGVPM Bukit Sagu 04 Estate, FGVPM Bukit Sagu 06 Estate, FGVPM Bukit Sagu 07 Estate and FGVPM Bukit Sagu 08 Estate by Wan Nur Aimy Nadiah Wan Solah and Mohd Afif Razmi of Sustainability Compliance & Certification Department, Group Sustainability Division, FGV Holdings Berhad. Sighted the SIA report: Final report – September 2024. It was noted the social impacts have identified and plans have been implemented to mitigate the negative impacts and promote the positive ones as referred in the document of <i>Pelan Mitigasi Syor Prnambahbaikan Impak Sosial (Negative)</i> and <i>Pelan Mitigasi Syor Penambahbaikan Impak Sosial (Positif)</i> and <i>Pelan Tindakan Pegurusan Impak Sosial</i>.</p> <p><u>Bukit Sagu 07</u></p> <p>Sampled of negative impacts as below:</p> <p>Issue: The high number of accidents involving estate workers, especially new employees, needs to be evaluated in terms of training and the risk level of the workplace.</p> <p>Management Action plan:</p> <ul style="list-style-type: none"> • A HIRADC review should be conducted if an accident occurs and should be reviewed by the SHO (Safety and Health Officer) or manager. • Training on safe work procedures according to work operations • Evaluation of effectiveness after training that has been implemented at the farm level. 	Complied

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		<u>Bukit Sagu 08 Estate</u> Sampled of negative impacts as below: Issue: The workers at the B&F dormitory have complained that no transportation is provided for them to perform Friday prayers. Management Action plan: Arrange a transportation schedule for workers to the mosque for Friday prayers.	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	The estates have established SOP Complaint Resolve Procedure that serves as the SOP for handling of complaints and grievance from both internal and external stakeholders. Refer SOP FGV/GGD/SOP/20 Ver 0.0 dated 03/01/2024. The procedure is to provide a system for the internal and external stakeholders to lodge complaint and grievances to the management. The complaints will be solved in 14 days (first stage), 14 days (second stage). The complaint must be resolved within 2 months from the date of discussion in third stage if the issue needs to be escalated to Wilayah Office. Any issues that can be resolved within the operating unit, it must be closed within 14 days. Besides, grievance reporting channels were published in the company's website, https://www.fgvholdings.com/whistleblowing/ . The FGV Holdings Berhad Whistleblowing Policy; Policy # FGV/GGD/POL/001; Rev. # 8.0; Effective date: 17/11/2020. The channels of reporting such as through letter, email, in person or Hotline Toll Free call. The whistleblowing e-form was available in	Complied

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		https://www.fgvholdings.com/sustainability/grievance/# for the stakeholders to report a grievance.	
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	<p>All estates implemented Complaint Book to record any external complaints and Complaint form for workers including housing defect. Reviewed the evidence of actions taken found that the complaint was resolved in timely manner.</p> <p><u>Bukit Sagu 07 Estate</u> Sample of the complaint is such as follow: Name: Norisha Binti Mohd Norazlin Date: 04/09/2024 Types of complaint: <i>stop cock, siling bocor, tangka air melimpah dan tikar getah ruang tamu koyak</i> Date resolve: 04/09/2024 Acknowledged by compliant: Yes</p> <p><u>Bukit Sagu 08 Estate</u> Sample of the complaint is such as follow: Name: Osman Bin Mashuri Date: 27/08/2024 Types of complaint: leakage of pipe Date resolve: 28/08/2024 Acknowledged by compliant: Yes</p>	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	<p><u>All sample estates</u> Complaint forms made available in the office both estates where employees and affected stakeholders can make complaint.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	Employees and the surrounding communities were made aware that complaints or suggestions can be made any time via briefing made during latest Stakeholder Meeting as per Minutes of Meeting records of Laporan Program Konsultasi Bersama Pihak Berkepentingan Mengenai Komitmen Kelestarian FGV; Kompleks Bukit Sagu, Kompleks Panching & Kompleks Neram; Date: 05/09/2023; Venue @ Dewan Auditorium Akademi Latihan FGV (ALAF), Jalan Bukit Kuantan, 26050 Kuantan, Pahang. Both estates have also conducted the complaint and grievance briefing during morning rollcall session.	Complied
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	<u>All sample estates</u> The estate has kept the complaints and resolution for the last 24 months.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	<u>Bukit Sagu 07 Estate</u> Contributions made based on consultation with local communities as per sample as following: - School children transport to POLISAS on 11/06/2024 <u>Bukit Sagu 08 Estate</u> Contributions made based on consultation with local communities as per sample as following: - <i>program, mengacau bubur asyura Wilayah Kuantan</i> on 06/08/2024	Complied
Criterion 4.4.4: Employees safety and health			

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Criterion / Indicator		Assessment Findings	Compliance
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	<p>FGV Holdings Berhad has established the Health and Safety Policy Statement (Pernyataan Polisi Kesihatan dan Keselamatan), signed by the Group CEO on 03/10/2022. This policy has been communicated to workers through induction training for new employees, morning briefings, and by being displayed on various notice boards across the estates. The SCC Department is also dedicated to improving workplace safety by developing various working standards through procedures or pictorial methods.</p> <p>The estates have implemented a Safety and Health Management Plan, which is documented in the Environment, Safety, and Health (ESH) Plan for FY 2024. The plan includes ESH Risk Management, Emergency Response Procedures, Chemical Safety Management, Noise Boundary Monitoring, and Health Monitoring.</p>	Complied
4.4.4.2	<p>The occupational safety and health plan shall cover the following:</p> <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). 	<p>The occupational safety and health plan cover the following:</p> <ul style="list-style-type: none"> a. FGV Holdings Berhad has established the Health and Safety Policy Statement (Pernyataan Polisi Kesihatan dan Keselamatan), signed by the Group CEO on 03/10/2022. The policy has been communicated to staff and workers through induction training for new employees, morning briefings, and displayed on notice boards across the estate. b. The estates have conducted risk assessments for all operations, which are documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC) system. This assessment covers both main and support operations. Verified activities in the HIRARC include manuring, harvesting, spraying, and others. The HIRARC is reviewed annually and updated as needed, particularly in response to any accidents that occur on the estate. 	Complied

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<p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate.</p> <ul style="list-style-type: none"> – Bukit Sagu 07 Estate: The Chemical Health Risk Assessment Report conducted by OXXXXXXX Consultancy on 27/01/2024 (Report Number: HQ/10/ASS/00/8 2024/028) was available for verification. – Bukit Sagu 08 Estate: The Chemical Health Risk Assessment Report conducted by OXXXXXXX Consultancy on 14/09/2022 (Report Number: HQ/10/ASS/00/8 2022/063) was available for verification. <p>Medical Surveillance was conducted for workers exposed to chemicals and welding fumes in the estate as recommended in the CHRA. The medical surveillance was conducted to monitor the level of exposure on the workers towards the chemicals and fumes.</p> <ul style="list-style-type: none"> – Bukit Sagu 07 Estate: Medical Surveillance was conducted on 06/01/2024 at Klinik SXXX BXXXXXXX for 47 estates chemical handlers who have been exposed to chemicals. Results indicated that no workers had abnormal results (Occupational or Non occupational caused) – Bukit Sagu 08 Estate: Medical Surveillance was conducted on 28/12/2023 at Klinik SXXX BXXXXXXX for 28 estates chemical handlers who have been exposed to chemicals. Results indicated that no workers had abnormal results (Occupational or Non occupational caused) 	

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		<p>Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the estates.</p> <ul style="list-style-type: none"> – FGVPB Bukit Sagu 07 Estate: The assessment was conducted on 20/12/2023 by OXXXXXXXX Consultancy & Services Sdn Bhd. The assessment report was available for verification. – FGVPB Bukit Sagu 08 Estate: The assessment was conducted on 23/11/2023 by OXXXXXXXX Consultancy & Services Sdn Bhd. The assessment report was available for verification. <p>Audiometric Test was done for workers exposed to excess noise at the workplace in compliance with the Noise Risk Assessment.</p> <ul style="list-style-type: none"> – Bukit Sagu 08 Estate: Audiometric Assessment was conducted on 02/07/2024 for a total of 19 workers by Klinik SXXX BXXXXXXXX Sdn Bhd and the Audiometric Test Report was available for verification. The results indicated that 6 workers were diagnosed with STS. The estate has conducted the retest in 07/08/2024 and report was in progress. – Bukit Sagu 08 Estate: Audiometric Assessment was conducted on 23/07/2024 for a total of 23 workers by Klinik SXXX BXXXXXXXX Sdn Bhd and the Audiometric Test Report was available for verification. The results indicated that 2 workers were diagnosed with STS. The estate will conduct the retest in 12/09/2024. <p>c. The estates have implemented a training program for employees exposed to chemicals used in the palm oil estate, aimed at maintaining continuous awareness among workers. The training sessions were conducted by the Manager, Assistant Manager, and representatives from chemical suppliers, targeting supervisors and</p>	

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		<p>operators. The training records were reviewed and are available as follows.</p> <p><u>Bukit Sagu 07 Estate</u></p> <ul style="list-style-type: none"> – Safety Transport training dated 05/02/2024. – Harvesting Training dated 26/08/2024 <p><u>Bukit Sagu 08 Estate</u></p> <ul style="list-style-type: none"> – PPE Training dated 05/02/2024. – HIRARC Training dated 26/03/2024. <p>d. All workers have been provided with appropriate personal protective equipment (PPE) by the management, free of charge. During field visits to the spraying and harvesting gangs, as well as inspections of the estate and mill stores, it was observed that all personnel were wearing the required PPE. Interviews with workers confirmed their awareness of the importance of PPE as a control measure to prevent or reduce risks associated with their daily tasks. They also confirmed that all PPE was provided without any deductions from their salaries. PPE issuance records, documented in "FGVPM OSH: Peralatan Perlindungan Diri (PPE)," and workers' payslips were verified to support their statements.</p> <p>e. Standard Operating Procedures for the Handling of Chemicals are outlined in the Manual Procedure, Document Number: FGV/FGVPM/II/IMS/15/009, for Chemical Control. This procedure provides detailed guidelines on the safe handling of agrochemicals and has been verified to comply with the USECHH Regulations 2000.</p> <p>f. The estate management has appointed Safety Committee Members, consisting of the OSH Coordinator, Secretary, employer</p>	

Criterion / Indicator		Assessment Findings	Compliance												
		<p>representatives, and employee representatives, as outlined in the appointment letter issued by the Estate Manager. The Estate Manager has been appointed as the Chairman of the OSH Committee, as stated in the appointment letter signed by the Regional Controller of the Kuantan Region.</p> <p>g. The management holds regular OSH committee meetings on a quarterly basis and as needed in response to accidents. These meetings address various issues related to employee safety, health, and welfare, including operational risks, health achievement reports, estate security, safety compliance by contractors, workplace inspections, legal compliance, and safety and health training.</p> <table><tr><td>OSH Meeting</td><td>Bukit Sagu 07</td><td>Bukit Sagu 08</td></tr><tr><td>1st Meeting</td><td>29/01/2024</td><td>21/03/2024</td></tr><tr><td>2nd Meeting</td><td>15/05/2024</td><td>27/06/2024</td></tr><tr><td>3rd Meeting</td><td>17/07/2024</td><td>TBC on Sept 2024</td></tr></table> <p>h. Accident and emergency procedures are established in the sampled estates to address various situations, including fires, accidents, chemical spills, and oil spills. Each estate has an Emergency Response Team (ERT) led by the Estate Manager. Emergency Response Plans are in place for incidents such as pesticide spills, fires, explosions, diesel spills, and accidents. The ERT chart and Fire Extinguisher Map were reviewed and verified. Emergency Response Training has been conducted as follows:</p> <ul style="list-style-type: none">- Bukit Sagu 07 Estate: 05/08/2024- Bukit Sagu 08 Estate: 22/04/2024 <p>i. First aiders have been assigned to various workstations across the estates. Mandores and staff are responsible for the first aid boxes</p>	OSH Meeting	Bukit Sagu 07	Bukit Sagu 08	1 st Meeting	29/01/2024	21/03/2024	2 nd Meeting	15/05/2024	27/06/2024	3rd Meeting	17/07/2024	TBC on Sept 2024	
OSH Meeting	Bukit Sagu 07	Bukit Sagu 08													
1 st Meeting	29/01/2024	21/03/2024													
2 nd Meeting	15/05/2024	27/06/2024													
3rd Meeting	17/07/2024	TBC on Sept 2024													

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		<p>at each workstation, as assigned by the management. These boxes have recently been replenished and contain all the necessary items. First aid training is conducted regularly at the sampled estates, and the documentation of these trainings has been verified as follows:</p> <ul style="list-style-type: none"> - Bukit Sagu 07 Estate: 20/08/2024 - Bukit Sagu 08 Estate: 12/08/2024 <p>j. All accident incidents are reviewed during the quarterly safety meetings held in the operating units. Records of Lost Time Accidents (LTA) are maintained and presented during these meetings. Accident records are updated and available for verification. The JKKP 8 forms have been submitted to DOSH as required and are available for verification.</p> <p>Bukit Sagu 07 Estate: 2 accident cases were reported for the year 2023. The JKKP 8 form for the year ending 2023 was submitted to DOSH on 23/01/2024, with documents reference Number: JKKP 8/148617/2023.</p> <p>Bukit Sagu 08 Estate: 6 accident cases were reported for the year 2023. The JKKP 8 form for the year ending 2023 was submitted to DOSH on 23/01/2024, with documents reference Number: JKKP 8/130688/2023.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.	<p>FGV Holdings Berhad has developed Group Sustainability Policy (Policy No.: FGV/GSD/POL/03 Rev. 05 dated 26/02/2024 where the company respect human rights by upholding international human rights principles and standards as encapsulated in the Universal Declaration of Human Rights (UDHR), and other applicable international human</p>	Complied

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	- Major compliance -	rights treaties, subject to the laws and regulations of the countries and territories in which FGV Group operates. In fulfilling its responsibility to respect human rights, FGV Group is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs). Furthermore, there's also Manual Pengurusan Tenaga Kerja Sektor Perladangan; Jabatan Tenaga Kerja & Perhubungan Peneroka Sektor Perladangan; FGV Holdings Berhad; Manual Ref. # FGV/JTK/MAN/001; Rev. # 3.0; Effective Date: 17/04/2023 as part of the policy of good social practices. Briefing of the policy to the workers was conducted on from time to time during daily muster assembly and workers meeting. Interview conducted with the workers confirmed that the management treated all the workers equally.	
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	FGV Holdings Berhad has developed Group Sustainability Policy (Policy No.: FGV/GSD/POL/03 Rev. 05 dated 26/02/2024 where the company where no person shall be subjected to any discrimination in employment, including hiring, compensation, advancement, training, disciplinary action, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, gender identity, nationality, political opinion, social group, ethnic origin, reproductive rights or other forms of discrimination. Briefing of the policy to the workers was conducted on from time to time during daily muster assembly and workers meeting. Interview conducted with the workers confirmed that the management treated all the workers equally.	Complied
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.	All estate employees are covered under Collective Agreement between FGV Plantations (Malaysia) Sdn. Bhd. and FGV Plantations (Malaysia) Sdn. Bhd. Peninsular Workers Union (Kesatuan Pekerja-pekerja FGV Plantations Malaysia Sdn. Bhd. Semenanjung); Validity Period: 01/01/2022 – 31/12/2024; COG. # 298/2022; Reg. date: 01/12/2022.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>Workers were paid according to the company's policy, Collective Agreement and legal requirements of National Minimum Wage Order 2022 as per sample as following:</p> <p><u>Bukit Sagu 07 Estate</u></p> <p>Sample of the workers is such as follow:</p> <ol style="list-style-type: none"> Employee Id: FW04750XXX <ul style="list-style-type: none"> August: RM 1798.70 July: RM 1683.30 June: RM 1914.95 Employee Id: FW04751XXX <ul style="list-style-type: none"> August: rm 1628.73 July: RM 1578.36 June: RM 1510.14 Employee Id: FW04751XXX <ul style="list-style-type: none"> August: RM 2122.49 July: RM 2204.75 June: RM 2334.40 Employee Id: FW04751XXX <ul style="list-style-type: none"> August: RM 1452.50 (23 working days) July: RM 1568.26 June: RM 1512.31 Employee Id: FW04751XXX <ul style="list-style-type: none"> August: RM 1815.41 July: RM 1798.70 	

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> June: RM 1510.20 <p>6. Employee Id: LW04750XXX</p> <ul style="list-style-type: none"> August: RM 1694.80 July: RM 1792.40 June: RM 1694.80 <p>7. Employee Id: FW04751XXX</p> <ul style="list-style-type: none"> August: RM 1760.58 July: RM 1683.30 August: RM 1683.30 <p>8. Employee Id: LW04750XXX</p> <ul style="list-style-type: none"> August: RM 1794.60 July: RM 1795.54 August: RM 1837.12 <p><u>Bukit Sagu 08 Estate</u> Sample of the workers is such as follow:</p> <p>1. Employee Id: FW06291XXX</p> <ul style="list-style-type: none"> August: RM 1764.10 July: RM 1818.87 June: RM 1516.72 <p>2. Employee Id: FW 06291XXX</p> <ul style="list-style-type: none"> August: RM 1764.10 July: RM 1818.87 June: RM 1520.25 <p>3. Employee Id: FW 04751XXX</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • August: RM 2184.42 • July: RM 2056.88 • June: RM 2000.96 <p>4. Employee Id: FW 06290XXX</p> <ul style="list-style-type: none"> • August: RM 2427.67 • July: RM 2288.76 • June: RM 2325.56 <p>5. Employee Id: FW 06291XXX</p> <ul style="list-style-type: none"> • August: RM 1836.01 • July: RM 1557.90 • June: RM 1500.20 <p>6. Employee Id: FW 062911XXX</p> <ul style="list-style-type: none"> • August: RM 2256.17 • July: RM 1919.59 • June: RM 2137.11 <p>7. Employee Id: LW 06290XXX</p> <ul style="list-style-type: none"> • August: RM 2017.30 • July: RM 1743.60 • August: RM 1829.00 <p>8. Employee Id: LW 06290XXX</p> <ul style="list-style-type: none"> • August: RM 1972.16 • July: RM 1868.89 • August: RM 1782.60 	

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>As per Supplier Code of Conduct, FGV Holdings Berhad; Doc. Version: 0 01/05/2020; Doc. Owner FGV Group Procurement for sample contractors as following:</p> <p><u>Bukit Sagu 07 Estate</u></p> <p>Sighted the contractor (Nxxxx Gxxxxxx Exxxxxxxx-FFB Transport) is available. Verify the payment slip of the sample workers for the month of June, July and August is available. Sample of the workers is such as follow:</p> <ol style="list-style-type: none"> 1. Axxxx A/L Pxxxxxx 2. Bxxxx Hxxxx Bxx Mxxxxxx <p><u>Bukit Sagu 08 Estate</u></p> <p>Sighted the contractor (Mxxx Bxxxxxx Exxxxxxxx -rental machinery) is available. Verify the payment slip of the sample workers for the month of June, July and August is available. Sample of the workers is such as follow:</p> <p>Sxxxxxx Bxx Axxxx</p>	Complied
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p><u>All sample estates</u></p> <p>Bukit Sagu 07 Estate and Bukit Sagu 08 Estate management established records that provided accurate accounts of all employees including contractors' workers. The records contained full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p>	<p>Employees ahs been provided with fair contract and signed by both parties. Sample as below:</p> <p><u>Bukit Sagu 07 Estate</u></p> <p>Sample of the workers is such as follow:</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<ol style="list-style-type: none"> 1. Employee Id: FW04750XXX 2. Employee Id: FW04751XXX 3. Employee Id: FW04751XXX 4. Employee Id: FW04751XXX 5. Employee Id: FW04751XXX 6. Employee Id: LW04750XXX 7. Employee Id: FW04751XXX 8. Employee Id: LW04750XXX <p><u>Bukit Sagu 08 Estate</u></p> <p>Sample of the workers is such as follow:</p> <ol style="list-style-type: none"> 1. Employee Id: FW06291XXX 2. Employee Id: FW 06291XXX 3. Employee Id: FW 04751XXX 4. Employee Id: FW 06290XXX 5. Employee Id: FW 06291XXX 6. Employee Id: FW 062911XXX 7. Employee Id: LW 06290XXX 8. Employee Id: LW 06290XXX 	
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	<p><u>All sample estates</u></p> <p>All estates implemented "kong balak" system to record the working hours where the attendance, working hour and productivity of each worker were publicly displayed at the office area and transparent for the workers to review, while the "Punch Card" system for office staff to record working hours and overtime. Verified the "kong balak" and Punch Card found the workers were paid accordingly. Verification on</p>	Complied

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		the Kong Balak and Pocket Checkroll Report found their correlation between the attendance of the workers and actual payment.	
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance -	All estates implemented "kong balak" system to record the working hours for workers and "Punch Card" system for office staff to record working hours and overtime. Verified the kong balak and Punch Card found the workers were paid accordingly. Interviewed with the workers confirmed that they were given time to break. Overtime was in voluntarily basis. <u>Bukit Sagu 07 Estate</u> Sample of the workers: 1. Employee Id: LW04750XXX 2. Employee Id: LW04750XXX <u>Bukit Sagu 08 Estate</u> Sample of the workers: 1. Employee Id: LW06290XXX 2. Employee Id: LW06290XXX	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	<u>All sample estates</u> Wages and overtime payment were clearly indicated in the payslip and all the payment was according to the legal requirements and Collective Agreement.	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - Minor compliance -	<u>All sample estates</u> The management has subsidized the cost of medical care of total RM 200 per year, RM 4 for water bill and RM 6 for electricity bill. Free school bus was provided to the children of workers.	Complied

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<p>4.4.5.11 In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p>- Major compliance -</p>	<p><u>All sample estates</u></p> <p>All workers are provided with housing facilities that furnish with sanitation facilities, water and electricity supplies. Water and electricity usage is subsidized by the company and these conditions are stated in the collective agreement. Interview with workers confirms that there is no issue related to the payment of water and electricity. Linesite inspection was carried out on daily basis and weekly basis as per latest sample as following:</p> <p><u>Bukit Sagu 07 Estate</u></p> <p>During a site visit to housing compound RPT4, it was observed that the surrounding area had not been properly maintained. A pile of garbage, including an old mattress, empty food containers, plastic bottles, and old wires, had been illegally dumped behind the housing area. A weekly housing inspection was conducted in the first week of September by the responsible person, and the issues, such as food scraps, old mattresses, and other waste, were recorded in the Senarai Semak Aktiviti Naziran Penginapan Ladang (Mingguan). However, despite this, the auditor's visit revealed that the problem persisted, and no action had been taken. This issue, initially flagged as a Minor non-compliance in the previous audit, has now been escalated to a Major NC.</p>	<p>Major Non Compliance</p>
<p>4.4.5.12 The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>FGV Holdings Berhad has developed Group Sustainability Policy (Policy No.: FGV/GSD/POL/03 Rev. 05 dated 26/02/2024 where the company shall not tolerate any form of harassment and abuse including physical, sexual, psychological or verbal. Everyone shall be treated with respect and dignity.</p> <p><u>Bukit Sagu 07 Estate</u></p>	<p>Complied</p>

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		<p>Gender committee meeting was conducted on 21/08/2024. The estate management has also conducted the sexual harassment training on 31/07/2024. Sighted the training record is available as per audit.</p> <p><u>Bukit Sagu 08 Estate</u></p> <p>Gender committee meeting was conducted on 01/08/2024. The estate management has also conducted the sexual harassment training on 24/06/2024. Sighted the training record "Taklimat Penerangan Gangguan Seksual" is available as per audit.</p>	
4.4.5.13	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p><u>All sample estates</u></p> <p>The management respect the right of all employees to join trade union and allow workers own representatives to facilitate collective bargaining in accordance with applicable laws and regulations as per records of Kesatuan Pekerja -Pekerja FGV Plantation Malaysia Sdn Bhd Jawatankuasa Perundingan Kerja Minute Meeting FGPMBS Wilayah Kuantan 20/02/2024; Minutes of meeting ref. Bil 89; at EDC Hotel Kuala Lumpur.</p>	Complied
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children and young persons is acceptable on family farms, under adult supervision, and when not interfering with their education. They shall not be exposed to hazardous working conditions.</p> <p>- Major compliance -</p>	<p><u>All sample estates</u></p> <p>FGV Holdings Berhad has developed Group Sustainability Policy (Policy No.: FGV/GSD/POL/03 Rev. 05 dated 26/02/2024 where the company is committed to employing only persons of the age of 18 and above, FGV recognizes that Malaysian laws allow for young persons to be engaged in certain forms of employment. Therefore, no person shall be employed under the age of 15, and any employment of young persons shall not be in a manner that is likely to be hazardous, or to interfere with such person's education, or to be harmful to the person's health or physical, mental, spiritual, moral, or social development at</p>	Complied

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		any stage of the employment. Besides, the contractors/ third party service provider have signed on the Supplier Code of Conduct, FGV Holdings Berhad where prohibition of child labour who under the age of 18. Document reviewed on the master list of employees and the contractor’s workers found that no child labour sighted.																													
Criterion 4.4.6: Training and competency																															
4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept. - Major compliance -	<div>All employees and contractors undergo proper training. The estates' management has established a training matrix and training program for the year 2023 and 2024 to ensure that relevant and necessary training is provided to individuals.</div> <div>Bukit Sagu 07 Estate<table><tr><th>Training</th><th>Date</th></tr><tr><td>Spraying Training</td><td>10/06/2024</td></tr><tr><td>Chemical Handling Training</td><td>09/02/2024</td></tr><tr><td>Manuring Training</td><td>20/08/2024</td></tr><tr><td>PPE Training</td><td>28/03/2024</td></tr><tr><td>Harvesting Training</td><td>26/08/2024</td></tr><tr><td>First Aid Training</td><td>20/08/2024</td></tr><tr><td>Fire Drill Training</td><td>05/08/2024</td></tr><tr><td>Slashing Training</td><td>28/03/2024</td></tr></table></div> <div>Bukit Sagu 08 Estate<table><tr><th>Training</th><th>Date</th></tr><tr><td>First Aid Training</td><td>12/08/2024</td></tr><tr><td>ERP Training</td><td>22/04/2024</td></tr><tr><td>Safety & Policy Training</td><td>26/02/2024</td></tr><tr><td>Buffer zone training</td><td>15/02/2024</td></tr></table></div>	Training	Date	Spraying Training	10/06/2024	Chemical Handling Training	09/02/2024	Manuring Training	20/08/2024	PPE Training	28/03/2024	Harvesting Training	26/08/2024	First Aid Training	20/08/2024	Fire Drill Training	05/08/2024	Slashing Training	28/03/2024	Training	Date	First Aid Training	12/08/2024	ERP Training	22/04/2024	Safety & Policy Training	26/02/2024	Buffer zone training	15/02/2024	Complied
Training	Date																														
Spraying Training	10/06/2024																														
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Manuring Training	20/08/2024																														
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Buffer zone training	15/02/2024																														

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		SW training	23/03/2024	
		RTE & Endangered Species Training	27/03/2024	
		Harvesting Training	08/01/2024	
		Chemical Handling training	13/03/2024	
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	The estate has devised a comprehensive training program for mill executives, workers, and contractors based on a training needs analysis. This analysis is documented in the Training Matrix analysis, which considers job designations and identifies various types of training needs for employees. The training types are categorized into three groups: Core training, non-core training – theoretical training, and non-core training – theoretical and hands-on training. Identified training needs have been planned and implemented.		Complied
4.4.6.3	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure. - Minor compliance -	The estate maintains an annual training program that is updated through a training needs analysis. The identified training sessions are scheduled throughout the year, with the latest programming being dated January 2024. This ensures that training initiatives align with the evolving needs of the estate's workforce.		Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services				
Criterion 4.5.1: Environmental Management Plan				
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	FGV Holdings Berhad has established Environmental Policy signed by Mohd Nazrul Izam Mansor, Group Chief Executive Officer dated 03/10/2022. Refer doc no FGV/GHR/HSEQ/POL/004. Policy Briefing Training has been conducted on 03/09/2024 during Muster Call at Bukit Sagu 07 Estate and on 19/02/2024 at Bukit Sagu 08 Estate.		Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations.</p> <p>- Major compliance -</p>	<p>An Assessment conducted for aspect and impact, significant aspect was mitigated and controlled accordingly. Monitoring of implementation recorded in the assessment form accordingly. Sighted Report of Aspect and Impact of Estate Activity, Waste and Pollution (RSPOI 2019 (Kriteria 5.1/5.3/5.6) dated 19/12/2022 an Action Plan to mitigate and control under Schedule 4.2 and 4.3.</p> <p>Bukit Sagu 07 Estate and Bukit Sagu 08 Estate has established the Environment Aspect Impact dated 01/01/2024.</p>	Complied
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>Bukit Sagu 07 and Bukit Sagu 08 Estate has established and documented Continual Improvement Plan to promote positive impact for year 2024:</p> <ul style="list-style-type: none"> • Objective: Zero Open Burning by monitoring at workers' hostel, and training to workers. • Objective: Reduce the chemical usage by substituting the chemical and reduce the chemical usage. • Reduce Use of Chemicals based Pesticides (Additional Barn Own, Beneficial Plant -Turnera, cassia, antigonan, grass cutting. • Reduce the paper consumption by printing on both sides. • Triple rinsing the empty chemical container before disposing. 	Complied
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>A training program as in the Training Program updated on a yearly basis or revised as per the management requirement. Included in this programme are subjects related to environment e.g. environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training. Other training organised in relation to environmental issues and activities among other as record kept.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	The estate management has conducted the training related to environment: <u>Bukit Sagu 07 Estate</u> 1. Policy Training on 3R and open burning prohibition dated 03/09/2024 2. Schedule Waste Training on 08/09/2024 <u>Bukit Sagu 08 Estate</u> 1. Buffer Zone Training dated 13/05/2024 2. Schedule Waste Training dated 23/03/2024 3. Solid Waste Training dated 30/04/2024	Complied
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	The management has conducted the Environment Meeting. The meeting was conducted at Bukit Sagu 07 Estate on 17/07/2024 and 29/01/2024. Bukit Sagu 08 Estate has conducted the meeting on 21/03/2024 and 27/06/2024. Verified the minutes of meeting at both estates. The agenda of the meeting will be as follows: 1. Pollution statistic 2. Trainings 3. Work place inspection – Chemical store, Schedule Waste Store, Fertiliser Store, and Buffer Zone 4. SHO Visit report 5. Registration of new aspect impact 6. Status of current aspect impact 7. Wildlife monitoring 8. Water quality monitoring 9. Schedule Waste inventory	Complied

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Criterion / Indicator		Assessment Findings	Compliance																																																																
		10. Planning of activities 11. Legal matter																																																																	
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																																																																			
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance -	<p>The management has recorded and monitored the consumption of non-renewable energy and has established the baseline value of each consumption.</p> <p>Sighted the consumption record of water, electricity, and diesel is available for review during the audit. The data is as follows:</p> <p>1. <u>Bukit Sagu 07 Estate</u></p> <table border="1"> <thead> <tr> <th>Month</th><th>Water (m³)</th><th>Electricity (kWh)</th><th>Diesel (Liter)</th></tr> </thead> <tbody> <tr><td>Jan 2024</td><td>1,314.18</td><td>15,335</td><td>3,234</td></tr> <tr><td>Feb 2024</td><td>2,600.00</td><td>15,898</td><td>3,291</td></tr> <tr><td>Mar 2024</td><td>4,818.67</td><td>16,087</td><td>3,184</td></tr> <tr><td>Apr 2024</td><td>5,447.58</td><td>16,546</td><td>3,621</td></tr> <tr><td>May 2042</td><td>1,029.27</td><td>16,747</td><td>3,570</td></tr> <tr><td>June 2024</td><td>5,681.10</td><td>17,539</td><td>3,476</td></tr> <tr><td>July 2024</td><td>5,266.20</td><td>17,982</td><td>3,592</td></tr> <tr><td>Aug 2024</td><td>4,806.40</td><td>18,658</td><td>3,782</td></tr> </tbody> </table> <p>2. <u>Bukit Sagu 08 Estate</u></p> <table border="1"> <thead> <tr> <th>Month</th><th>Water (m³)</th><th>Electricity (kWh)</th><th>Diesel (Liter)</th></tr> </thead> <tbody> <tr><td>Jan 2024</td><td>1,353</td><td>9,161</td><td>5,632</td></tr> <tr><td>Feb 2024</td><td>1,760</td><td>9,956</td><td>5,357</td></tr> <tr><td>Mar 2024</td><td>1,680</td><td>10,659</td><td>5,695</td></tr> <tr><td>Apr 2024</td><td>1,270</td><td>10,163</td><td>5,152</td></tr> <tr><td>May 2042</td><td>1,742</td><td>10,872</td><td>5,565</td></tr> <tr><td>June 2024</td><td>1,780</td><td>12,137</td><td>5,294</td></tr> </tbody> </table>	Month	Water (m ³)	Electricity (kWh)	Diesel (Liter)	Jan 2024	1,314.18	15,335	3,234	Feb 2024	2,600.00	15,898	3,291	Mar 2024	4,818.67	16,087	3,184	Apr 2024	5,447.58	16,546	3,621	May 2042	1,029.27	16,747	3,570	June 2024	5,681.10	17,539	3,476	July 2024	5,266.20	17,982	3,592	Aug 2024	4,806.40	18,658	3,782	Month	Water (m ³)	Electricity (kWh)	Diesel (Liter)	Jan 2024	1,353	9,161	5,632	Feb 2024	1,760	9,956	5,357	Mar 2024	1,680	10,659	5,695	Apr 2024	1,270	10,163	5,152	May 2042	1,742	10,872	5,565	June 2024	1,780	12,137	5,294	Complied
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Criterion / Indicator		Assessment Findings					Compliance																		
		July 2024	1,631	10,706	8,055																				
		Aug 2024	1,912	11,684	7,799																				
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estate has estimated the non-renewal consumption, and it is available in the estate budget book for the year 2024. Verification has been made on both estate’s budget book, Referral can be made Bekalan Elektrik and Bekalan Air.					Complied																		
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Currently, there is no renewable energy being use in the estate.					Complied																		
Criterion 4.5.3: Waste management and disposal																									
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	All type of waste products and sources of pollutions identified in Bukit Sagu 07 and Bukit Sagu 08 Estate Estate. The categories identified such as: <table><tr><td>Operation (S/Waste)</td><td>Operation (Non-S/Waste)</td></tr><tr><td>PPE</td><td>Empty Fertilizer bag</td></tr><tr><td>Empty Containers</td><td>Used tyre</td></tr><tr><td>Used paint containers</td><td>Metal, plastics. Woods waste.</td></tr><tr><td>Used oils/hydraulic oils</td><td>Paper</td></tr><tr><td>Office and Housing (S/Waste)</td><td>Office and housing (Non-S/Waste)</td></tr><tr><td>Used/broken Lights</td><td>Furniture waste</td></tr><tr><td>Electronic waste</td><td>Domestic waste</td></tr><tr><td>Used Battery</td><td>Paper</td></tr></table>					Operation (S/Waste)	Operation (Non-S/Waste)	PPE	Empty Fertilizer bag	Empty Containers	Used tyre	Used paint containers	Metal, plastics. Woods waste.	Used oils/hydraulic oils	Paper	Office and Housing (S/Waste)	Office and housing (Non-S/Waste)	Used/broken Lights	Furniture waste	Electronic waste	Domestic waste	Used Battery	Paper	Complied
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Criterion / Indicator		Assessment Findings	Compliance															
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p>- Major compliance -</p>	<p>Source of waste and monitoring of wastes were managed properly and clearly identified as sampled. Proper waste disposal and recycling was observing and sighted a record of selling of waste products from recycling and converting waste into value added products. Sighted the waste management plan is available at both estates. The management plan has identified the source of pollution utilization of waste.</p>	Complied															
4.5.3.3	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>The management has established the Chemical Handling Procedure dated 01/02/2020 with Reference No: FGVPM/L3/GPK-006. The Procedure details handling, storage and disposal of the chemical and chemical containers.</p> <p>Records of Inventory and disposal of schedule waste at Bukit Sagu 07 Estate and Bukit Sagu 08 Estate</p> <table><tr><th>Month</th><th>Inventory Ref No</th><th>Remark</th></tr><tr><td>September 2024 – BS7</td><td>N/A</td><td>Generation SW408 – 53 kg SW409 – 11.7 kg SW409 - 0.9 kg</td></tr><tr><td>August 2024 – BS7</td><td>N/A</td><td>Generation SW 409 – 11.65 kg</td></tr><tr><td>September 2024 – BS8</td><td>N/A</td><td>SW409 – 170 kg</td></tr><tr><td>July 2024 – BS8</td><td>N/A</td><td>SW 409 – 0.1898 kg</td></tr></table> <p>The latest disposal of Schedule Waste on 04/09/2024. Refer the Consignment Note Ref No: 2024090410J1KOQC for SW409 and Ref No: 2024080915H4LDCW for SW201. Disposal was made through J&T Berjaxxxx Alxx Murxx Sdn Bhd</p>	Month	Inventory Ref No	Remark	September 2024 – BS7	N/A	Generation SW408 – 53 kg SW409 – 11.7 kg SW409 - 0.9 kg	August 2024 – BS7	N/A	Generation SW 409 – 11.65 kg	September 2024 – BS8	N/A	SW409 – 170 kg	July 2024 – BS8	N/A	SW 409 – 0.1898 kg	Complied
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Criterion / Indicator		Assessment Findings	Compliance
		Bukit Sagu 04 Estate act as the center for Schedule Waste collection for both Bukit Sagu 07 and Bukit Sagu 08. This was approved by Department of Environment dated 30/10/2019. Ref No: JAS.600-3/5/26 Jld.3(32). The letter also stated that the Bukit Sagu 04 is the one responsible to update the E-SWIS system.	
4.5.3.4	Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers. - Major compliance -	Department Of Environment has approved FGV Plantations (M) Sdn Bhd to declare that empty chemical container is not considered as Schedule Waste after triple rinsing. Refer approval letter from DOE (Ref No: AS(BB)91/110/619/161 Jilid 33(28), dated 23/01/2019). Verification on procedure and record has been made and verified that the management has disposal to Sungxx Karaxx Recycxxx Tradxxx Sdn Bhd dated 03/09/2024 at Bukit Sagu 08 Estate.	Complied
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	Domestic waste at Bukit Sagu 07 and Bukit Sagu 08 Estate was disposed to the municipal land fill. The management has engaged with the contractor to transport the domestic waste to the municipal landfilled. Both estates has engaged with BUX TECHXXXXX ENTXXXXX Sdn Bhd. Verified the contract and payment records. Sample of the payment records taken at Bukit Sagu 07 Estate with voucher no; 350449148 is verified.	Complied
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	Bukit Sagu 07 and Bukit Sagu 08 Estate has assessed polluting activities including GHG assessment 2023 (Jan-Dec) for operation of vehicles, pesticides and fertilizer used. The data will then be used in calculating GHG emission by using RSPO GHG Calculator.	Complied

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Criterion / Indicator		Assessment Findings	Compliance															
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Sighted Action Plan to Reduce Diesel Pollution Year 2024 for Bukit Sagu 07 and Bukit Sagu 08 Estate approved by Estate Manager. Among action included: a) Monitor and recording diesel consumption b) Provide training to PIC of diesel handling c) Alternately use solar panel d) Monitor and reduce the chemical consumption. e) Increase the usage of organic and compost as fertilizer.	Complied															
Criterion 4.5.5: Natural water resources																		
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.	FGV Plantations established and documented SOP Water Management (FGV/FGVPM/SOP/PAS-09) Version 2.0 dated 30/08/2021. The SOP explain aspect of water management as requirement of MSPO and RSPO. a) Water Management Plan 2024 prepared by both estate that was updated on 07/02/2024. Source of water – PAIP b) Water sampling and monitoring of rain fall data conducted and action plan to optimize water and nutrient usage to reduce wastage, Sample taken for river monitoring at Bukit Sagu 07 Estate with result as the following: <table><tr><td>Date</td><td>05/12/2023</td><td>05/12/2023</td></tr><tr><td>River</td><td>Sg Reman (In)</td><td>Sg Reman (Out)</td></tr><tr><td>BOD</td><td>2</td><td>2</td></tr><tr><td>COD</td><td>15</td><td>13</td></tr><tr><td>TSS</td><td>42</td><td>54</td></tr></table>	Date	05/12/2023	05/12/2023	River	Sg Reman (In)	Sg Reman (Out)	BOD	2	2	COD	15	13	TSS	42	54	Complied
Date	05/12/2023	05/12/2023																
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Criterion / Indicator		Assessment Findings			Compliance																				
	<p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>	<table><tr><td>pH</td><td>6.0</td><td>6.8</td></tr></table> <p>Bukit Sagu 08 Estate has conducted the water analysis on the same day.</p> <table><tr><td>Date</td><td>05/12/2023</td><td>05/12/2023</td></tr><tr><td>River</td><td>Sg Endan (In)</td><td>Sg Endan (Out)</td></tr><tr><td>BOD</td><td>2</td><td>2</td></tr><tr><td>COD</td><td>19</td><td>15</td></tr><tr><td>TSS</td><td>27</td><td>58</td></tr><tr><td>pH</td><td>6.0</td><td>6..85</td></tr></table>	pH	6.0	6.8	Date	05/12/2023	05/12/2023	River	Sg Endan (In)	Sg Endan (Out)	BOD	2	2	COD	19	15	TSS	27	58	pH	6.0	6..85	<p>c) The water management plan established has details the plan to reduce the water consumption. The management plan is as the following:</p> <p>1. Immediate repair for any water supply piping damage</p> <p>2. Campaign to close the tap after use</p> <p>3. Monitoring of water consumption</p> <p>4. Usage of rainwater for tractor washing</p> <p>5. Usage of rainwater for chemical mixing</p> <p>d) There is no natural vegetation removed in the riparian reserved areas. Site visit at Bukit Sagu 07 and Bukit Sagu 08 Estate along the Sungai Reman found that the areas is well maintain.</p> <p>e) There is no natural vegetation removed in the riparian reserved areas. Site visit at Bukit Sagu 07 Estate along the Sungai Reman found that the areas is well maintain.</p> <p>f) There is no water bore used in both estates visited.</p>	
pH	6.0	6.8																							
Date	05/12/2023	05/12/2023																							
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4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	During site visit found no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.			Complied																				

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	- Minor compliance -		
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). - Minor compliance -	Sighted during site visit, estate practicing rainwater harvesting from trenching built and opening in certain area in filed to trap water.	Complied
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			
4.5.6.1	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover: a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. - Major compliance -	The management, through the Sustainability Department, conducted the High Conservation Value (HCV) and Biodiversity Assessment in August 2024. In summary, the assessment identified the potential presence of HCV areas. The report provides a detailed overview of the rapid appraisal of biodiversity within the estates, addressing the relevant MSPO Principles and Criteria related to biodiversity conservation and HCV. The following aspects are covered in the report: a. General biodiversity issues b. Watercourses and drainage c. Natural and man-made habitats d. Wildlife e. Ponds and reservoirs f. Wetlands and watercourses g. Legal aspects h. Immediate and long-term effects.	Complied

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		As part of the biodiversity assessment, several animals were sighted within the estates, including wild boar, python, jungle fowl, fox, white-breasted water hen, and various species of birds. The HCV and Biodiversity Assessment was conducted by the management's Sustainability Department in August 2024.	
4.5.6.2	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include: a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. - Major compliance -	Relevant programme to workers pertaining awareness of HCV areas and RTE observed conducted. Interview with employees noted that awareness programme had been conducted. Employees were aware of a) Not to capture, harm, kill any wildlife. b) Disciplinary measures shall be taken if found violating company rules. c) Not to chemicals in riparian buffer zone.	Complied
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. - Major compliance -	The estate observed and implemented the established action plans, including monitoring (patrolling) of the conservation areas by Auxiliary Police. Record of monitoring (patrolling) observed maintained. Observed no monitoring outcomes that requires changed of practices or action plan.	Complied
Criterion 4.5.7: Zero burning practices			
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -	FGV practices of "Zero open burning" is enforced and elaborated in the Group Sustainability Policy dated May 2019. Also included in the following guidelines; a. Manual Ladang Sawit Lestari • Prosedur Kerja Selamat	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		b. Manual Sustainability <ul style="list-style-type: none"> • Prosedur Kerja Selamat • Prosedur membunuh Racun di PREMIX • Pengendalian Bahan Kimia • Penyediaan tanah tanam semula The estate adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates.	
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance -	There is no land preparation by means of burning at both the estates. This is confirmed through observation during the field visits and interview with the workers.	N/A
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	There is no land preparation by means of burning at both the estates. This is confirmed through observation during the field visits and interview with the workers.	N/A
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	The replanting activities were using chipping method, and no open burning were allowed in the estate.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			

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4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>The standard operation procedure for the estates operations is available which is prepared on Group basis. There are levels of the documentation identified as follows;</p> <ul style="list-style-type: none"> • Manual Ladang Sawit LESTARI on reviewed 1/6/12 - Sawit pra matang edisi II seksyen 3 • Manual Ladang Sawit LESTARI reviewed on 1/6/12 - Sawit matang edisi II seksyen 4 • Manual Ladang Sawit LESTARI 1/6/12 - Pembajaan sawit edisi II seksyen 5 • Prosedur Kerja Selamat • Manual Kelestarian (Sustainability) <p>Amendments are made should there be requirement to suit the local issues/situation. The Agronomy and Agricultural Services Department, Sustainability Unit (SCCD), Plantation Head and relevant Head Office personnel including the Regional Controller inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Other mechanism as described below.</p> <p>In practice, daily muster chit form is used for work planning at all sampled estates, which is prepared by field conductor, verified by assistant manager, and approved by estate manager. Based on the interview with estate managers, all activities will be monitored by field supervisor / mandore to ensure all activities are conducted as per plan. Daily work progress for major works such as harvesting, spraying, and manuring of all sampled estates is made available during the audit. The work progress is recorded on daily basis for every work gang. The</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		record which is reviewed by assistant and estate manager on daily and monthly basis.	
4.6.1.2	<p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p>- Major compliance -</p>	<p>The visited estates have implemented a management strategy for planting on slopes to minimize and control erosion and soil degradation. Plantings on slopes between 9 and 25 degrees are guided by ARM guidelines, and terraces are constructed in areas with slopes greater than 6 degrees for replanting fields. Cover crops are planted to retain soil structure and promote conservation.</p> <p>Specific measures include:</p> <ul style="list-style-type: none"> • Roadside pits to divert water on sloped areas, preventing road erosion and surface damage. • Terraces constructed with an inclination towards the terrace wall. • Slope classification details for the estates as follows: <p>Interviews confirmed that practices to minimize and control erosion and soil degradation are in place. These practices include proper stacking of fronds, EFB application, avoidance of blanket spraying, construction of terraces, road maintenance, and maintaining soft vegetation in interlines. Cover crops are also planted in replanted areas.</p> <p>The slope maps for the titled areas were provided by the FGVPM Land Management Unit. Compliance with environmental protection is addressed in the Pernyataan Polisi Alam Sekitar FGV Holdings Berhad, dated 03/10/2022, signed by the Group CEO. The policy emphasizes the protection and conservation of biodiversity and ecosystems, specifying that for slopes <25 degrees, existing crops and vegetation shall be maintained accordingly.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																									
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	Field maps have been documented, and field identification markings are clearly shown on these maps. During field visits, it was observed that field markers are displayed in the fields to facilitate proper field identification.	Complied																									
Criterion 4.6.2: Economic and financial viability plan																												
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	Sighted in Bukit Sagu 07 and Bukit Sagu 08 Estate, available a long-term Budget established for 2024-2028 to demonstrate attention to economic and financial viability through long-term management planning. Sample taken for the budget sighted the record on operation expenditure and capital expenditure.	Complied																									
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance -	<div>The annual replanting plan was established for Bukit Sagu 07 and Bukit Sagu 08 Estate. The details of the replanting plan is as the following:</div> <table><tr><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td colspan="5">Bukit Sagu 07 Estate</td></tr><tr><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td colspan="5">Bukit Sagu 08 Estate</td></tr><tr><td>94.00</td><td>207.00</td><td>80.00</td><td>170.00</td><td>0.00</td></tr></table> <div>As for Bukit Sagu 07 Estate, there are no replanting plan for the next five years, as the latest planting in the year 2015.</div>	2024	2025	2026	2027	2028	Bukit Sagu 07 Estate					0.00	0.00	0.00	0.00	0.00	Bukit Sagu 08 Estate					94.00	207.00	80.00	170.00	0.00	Complied
2024	2025	2026	2027	2028																								
Bukit Sagu 07 Estate																												
0.00	0.00	0.00	0.00	0.00																								
Bukit Sagu 08 Estate																												
94.00	207.00	80.00	170.00	0.00																								
4.6.2.3	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB	The five years planning horizon 2024-2028 is available. Similarly, Bukit Sagu 07 and Bukit Sagu 08 Estate having a similar budget format. Inclusive is a 5-year budget/forecast financial plan 2024-2028 allocating categories among others: a. Crop yielding area	Complied																									

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Criterion / Indicator		Assessment Findings	Compliance
	d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment - Major compliance -	b. Mature cost c. General charges/ upkeep/ collection/ depreciation d. Cost/ha & cost /mt FFB e. CAPEX	
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	<p>The Regional Controller (RC) are accountable to monitor the estates/mill compliance towards the SOP, budget and productivity among others. Estates/ Mill performances are reviewed during the monthly meeting with Regional Controller or Zone Head. The following reports were reviewed and verified.</p> <p>The Agronomy and Agricultural Services Department Sustainability Unit, Plantation Head and relevant Head Office personnel including the Regional Controller inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. The mechanism as described below as per below sampling:</p> <p>Agronomist report for Bukit Sagu 07 Estate dated 17/05/2023 by FGVPMBSB Agronomist.</p> <p>Bukit Sagu 08 the agronomist already conducted the assessment and report dated 09/05/2023 by the same Agronomist.</p>	Complied
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Pricing mechanism was clearly stated in the agreement. Payments are processed and paid by the estates. Seen the payment vouchers that have been made promptly. Sampled of the Surat Perintah Kerja (SPK) of contractors as below: <u>Bukit Sagu 07 Estate</u>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> Nxxxx Gxxxxxxx Enterprise; Contractor: FFB Transporter; dated 12/12/2023. Validity 01/01/2023 – 31/12/2024. Pricing mechanism was sighted in Jadual Harga. Sighted the invoice no.: NG0624 dated 01/08/2024, official receipt no.: NG0625 dated 16/08/2024- within agreed timeframe (not later than thirty days after the acceptance of the transporter invoice). <u>Bukit Sagu 08 Estate</u> <ul style="list-style-type: none"> Mxxx Bxxxxxxx Enterprise; Contractor: FFB Transporter; Validity 01/01/2023 – 31/12/2024. Pricing mechanism was sighted in Table of Price. Sighted the invoice no.: 1579 dated 05/02/2024, payment voucher no.: 350471474 is available and payment was made on 13/03/2024. Referring with the Letter of Award (LOA) dated 22/12/2022, Table 1, Item No. 5; Payment Terms "Payment to the vendor shall be made within 30 days upon receive the invoice (s) and relevant supporting documents". 	
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<u>All Sample Estates</u> The contracts agreements have the details about the pricing and terms & conditions. Payment was made promptly by verified the payment vouchers and interviewed with the contractors. Sample of contract agreement for contractors as per sample in 4.6.3.1. <u>Bukit Sagu 08 Estate</u> Payment of the contractor services was made by the HQ. However, sample contractor; Mxxx Bxxxxxxx Enterprise, the FFB Transporter, has a contract valid from 01/01/2023 to 31/12/2024. An invoice (No.: 1579) dated 05/02/2024 and a payment voucher (No.: 350471474) confirm that payment was made on 13/03/2024. However, upon reviewing the invoice and payment voucher, a delay in payment was observed. According to the Letter of Award (LOA) dated 22/12/2022,	Minor Non Compliance

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Criterion / Indicator		Assessment Findings	Compliance
		Table 1, Item No. 5 specifies that payment must be made within 30 days upon receipt of the invoice and relevant supporting documents. An interview conducted during stakeholder consultation also confirmed the delay in payment to the contractor. Thus, Minor NC was raised.	
Criterion 4.6.4: Contractor			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	<p>Clauses for the contractor to adhere the MSPO and legal requirements are spelled out in addendum to the Contract Agreement. Among details in the letter were:</p> <ul style="list-style-type: none"> • "Telah Dimaklumkan oleh Pihak Pengurusan Ladang tentang Program Pensijilan MSPO/RSPO". • "Memahami Keperluan yang terandung dalam Program Pensijilan MSPO/RSPO". • "Sentiasa Mematuhi segala keperluan Pematuhan MSPO". • "Membenarkan Auditor dari Badan Pensijilan menyemak dokumen berkaitan, memeriksa operasi dan menemuramah para petugas dan pekerja kontraktor" <p><u>Bukit Sagu 07 Estate</u></p> <p>The estate management has conducted the briefing of MSPO requirement to the contractors. Sighted the record of "Taklimat Penerangan MSPO & GSD Version 5.0 Kepada Pihak Kontraktor" on 31/07/2024. Stakeholder consultation with the contractors also confirm that MSPO requirement briefing was conducted to them.</p> <p><u>Bukit Sagu 08 Estate</u></p> <p>The estate management has conducted the briefing of MSPO requirement to the contractors. Sighted the record of "Taklimat Penerangan MSPO & GSD Version 5.0 Kepada Pihak Kontraktor" on</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		25/03/2024. Stakeholder consultation with the contractors also confirm that MSPO requirement briefing was conducted.	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	<p>The contracts agreements have the details about the pricing and terms & conditions. Payment was made promptly by verified the payment vouchers and interviewed with the contractors. Sample of contract agreement for contractors is such as follow:</p> <p><u>Bukit Sagu 07 Estate</u> Nxxxx Gxxxxxxx Enterprise; Contractor: FFB Transporter; dated 12/12/2023. Validity 01/01/2023 – 31/12/2024. Contract agreement is available and documented in the Surat Perintah Kerja (SPK).</p> <p><u>Bukit Sagu 08 Estate</u> Mxxx Bxxxxxx Enterprise; FFB Transporter; dated 22/11/2022. Validity 01/01/2023 – 31/12/2024. Contract agreement is available and documented in the Letter of Award (LOA).</p>	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	<p>FGV Holdings Berhad has agreed for BSI auditors to verify the assessment through a physical inspection if required. This stated in the contract agreement between estate management and each contractor. Clauses for the contractor to adhere the MSPO and legal requirements are spelled out in addendum to the Contract Agreement: "Membenarkan Auditor dari Badan Pensijilan menyemak dokumen berkaitan, memeriksa operasi dan menemuramah para petugas dan pekerja kontraktor".</p>	Complied
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted.	<p><u>All sample Estate</u> The contractor (Nxxxx Gxxxxxxx Enterprise) will key in the progress of work done (Sijil Pengakuan Melawat Kawasan Kerja yang Telah Siap) based on the FSA13 issued by the mill to ensure the amount of work done is tally. Work Completion certificate (Sijil Pengakuan Siap Kerja</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Bagi Tujuan Pembayaran) will be acknowledged by the Manager to accept the works done by contractor and payment will be made according to the certificate. Verified the contract payment slip for the payment of works done by contractor.	
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance -	Not Applicable, there are no new planting available.	N/A
Criterion 4.7.2: Peat Land			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	Not Applicable, there are no new planting available.	N/A

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -	Not Applicable, there are no new planting available.	N/A
Criterion 4.7.4: Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation.	Not Applicable, there are no new planting available.	N/A

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	Not Applicable, there are no new planting available.	N/A
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	Not Applicable, there are no new planting available.	N/A
Criterion 4.7.6: Customary land			
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to	Not Applicable, there are no new planting available.	N/A

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Criterion / Indicator		Assessment Findings	Compliance
	express their views through their own representative institutions. - Major compliance -		
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available.	Not Applicable, there are no new planting available.	N/A

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	Not Applicable, there are no new planting available.	N/A

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MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mills

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	<p>FGV Holdings Berhad has implemented a Group Sustainability Policy (Policy No.: FGV/GSD/POL/03 Rev. 05 dated 26/02/2024. The policy aims to define the objectives and guidelines for FGV Holdings Berhad and its Group of Companies (collectively referred to as the "FGV Group" or "Group") to meet FGV's sustainability commitments.</p> <p>Specifically, for MSPO (Malaysian Sustainable Palm Oil), there is a dedicated Policy Statement for Sustainability Certification Scheme (Doc. # FGV/SED/POL/003; Rev. 3.0), which encompasses all sustainability certifications undertaken by the company, including MSPO. This statement was signed by Mohd. Nazrul Izam Mansor, Group Chief Executive Officer, on 26/01/2022, and outlines FGV's commitment to complying with the requirements of UDHR, ILO, UNGP, SDG, and NDPE.</p> <p>A sample communication of the policy was observed during a morning assembly at Bukit Sagu POM on 19/04/2024, where management briefed workers on the policy.</p>	Complied
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	Clause 5.0 mentioned policy emphasizes that the company will continuously strive to improve the quality of its products and services. This will be achieved by adopting the best possible approaches to enhance productivity and profitability, optimizing resource use, and improving operational efficiencies. Additionally,	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		the company is committed to eliminating or minimizing any negative impacts on people and the environment.	
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	<p>The Internal Audit for Sustainability Certification Procedure (SOP No.: FGV/GSD-SCCD/SOP/04, dated 03/09/2020) has been established, covering internal audits for MSPO as well. The procedure states that internal audits must be conducted annually and before the Management Review.</p> <p>In line with this procedure, the mill has been conducting annual internal audits as required. Records of these audits are available for verification.</p> <p>At FGVPIB Bukit Sagu POM, the MSPO internal audit was carried out on 12-13/08/2024 by the Sustainability, Compliance, and Certification Department, and the Internal Audit Report is available for review.</p>	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	<p>The Internal Audit for Sustainability Certification Procedure (SOP No.: FGV/GSD-SCCD/SOP/04, dated 03/09/2020) has been established, which includes provisions for internal audits for MSPO. The procedure mandates that internal audits are to be conducted annually and prior to the Management Review.</p> <p>At FGVPIB Bukit Sagu POM, the MSPO internal audit was conducted on 12-13/08/2024 by the Sustainability, Compliance, and Certification Department. The Internal Audit Report is available for verification. During the assessment, the internal audit team identified 8 non-conformities with the MSPO Standard. The root causes of these non-conformities were identified, and corrections,</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		along with corrective action plans, are currently being implemented.	
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	<p>The internal audit report was documented and made available for management review. As evidence, all findings from the internal audit were addressed by the Mill Management within the acceptable timeframe.</p> <p>Details of the report are as follows: The MSPO Internal Audit was conducted on 12-13/08/2024 by the Sustainability, Compliance, and Certification Department. The Internal Audit Report is available for verification.</p>	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	<p>FGVPISB Bukit Sagu Complex conducted a management review meeting, with minutes and attendance records available for review. The meeting, chaired by the Mill Manager and attended by key personnel, took place on 02/09/2024 at FGVPISB Bukit Sagu POM. The agenda items discussed during the meeting included:</p> <ul style="list-style-type: none"> • MSPO and RSPO Principle and Criteria findings • Customer feedback • Process performance and product conformity • Environmental impact • Social impact • Replanting • Improvement of the effectiveness of the management system and processes 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> Resource needs 	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	Management of Bukit Sagu POM has established an objective dated and approved 01/02/2024 to be achieve as part of continual improvement such as: <ul style="list-style-type: none"> Achieve OER (23.00%) and KER (5.50%) at end of 2024. Reduce the water consumption to less than 1 m3 to 1 mt FFB Zero Accident for the year 2024 	Complied
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	System to improve practices in line with new information and techniques such as: <ul style="list-style-type: none"> EFB management Diesel Usage Increase Oil Extraction Rate and Kernel. 	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	Communication of information by Bukit Sagu POM management to internal stakeholders among Kompleks Bukit Sagu which involved the stakeholders form FGV, Felda and Head of Settlers. The meeting was conducted on 28/06/2024. Sighted the minute meeting of "JPPK Bukit Sagu" is available as per audit.	Complied
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure	The mill management issued a memo dated 13/02/2024 on the list of documents that are publicly available upon requested by the	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<p>of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>stakeholders on. List of documents that made publicly available as below:</p> <ul style="list-style-type: none"> - Land title - OSH plan - Environmental and social management plan - SEIA report - HCV report - Complaint and grievance procedure - Land dispute procedure - Policies such as Human Rights and Group Sustainability Policy - Assessment report of audits - etc. <p>Besides, documents such as company's policies, Supplier Code of Conduct and grievance procedure is accessible by the stakeholders via company's website: Policies & Guidelines - FGV Holdings Berhad.</p>	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>The FGVP has established the procedure for consultation and communication with the relevant stakeholder. The procedure of Komunikasi, Penglibatan dan Rundungan; SOP No.: FGV/FGVPM/II/IMS/15/006; version no. 2, effective date 01/11/2021 is available and cover for all staffs and workers, customers and stakeholders as per stated in the clause 2.0.</p>	Complied
4.2.2.2	<p>The management shall nominate management officials at the</p>	<p>Administrative Executive has been appointed as Communication and Social Officer for mill and seen the appointment letter dated</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	02/01/2024.	
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance -	Stakeholder list was established that include the FFB suppliers, local authorities, contractors and suppliers. Latest stakeholder meeting for internal stakeholders among Kompleks Bukit Sagu which involved the stakeholders from the management of FGV, Felda and Head of Settlers. The meeting was conducted on 28/06/2024 sighted the "Minit Mesyuarat JPPK Bukit Sagu" available as per audit. Consultation involving external meeting such as government bodies, contractor and others was conducted on 05/09/2023. Minutes of Meeting records of "Laporan Program Konsultasi Bersama Pihak Berkepentingan Mengenai Komitmen Kelestarian FGV; Kompleks Bukit Sagu, Kompleks Panching & Kompleks Neram"; Venue @ Dewan Auditorium Akademi Latihan FGV (ALAF), Jalan Bukit Kuantan, 26050 Kuantan, Pahang is available.	Complied
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance -	FGV Holdings Berhad has developed the MSPO Supply Chain Certification (Kilang Sawit) procedure, documented as SOP Number: FGV/GSD-SCCD/SOP/006, dated 07/01/2021. Section 6.8 of the procedure addresses Traceability for documents and products. The objective of this procedure is to provide guidelines for the mill to establish and ensure the effective implementation of a sustainable supply chain and traceability for certified sustainable materials, including FFB (Fresh Fruit Bunches), CPO (Crude Palm Oil), and PK (Palm Kernel).	Complied

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Criterion / Indicator		Assessment Findings	Compliance												
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Compliance with the traceability system is inspected daily. The weighbridge operator inputs all relevant data into the system, which is then verified by the executive at the end of the day. Weighbridge records and FFB delivery notes for incoming FFB and outgoing CPO and PK from the mill were reviewed. A Traceability Audit was conducted on 12-13/08/2024 by the Sustainability, Compliance, and Certification Department. The Audit Report is available for verification.	Complied												
4.2.3.3	The management shall identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The Weighbridge Clerk at FGVPIB Bukit Sagu POM was appointed as the person in charge of Traceability, as confirmed in the appointment letter dated 23/08/2023, signed by the Manager of FGVPIB Bukit Sagu POM. The job functions outlined in the letter specify that the appointed individual is responsible for managing traceability within the mill.	Complied												
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	FGV Holdings Berhad has developed the MSPO Supply Chain Certification (Kilang Sawit) procedure, documented as SOP Number: FGV/GSD-SCCD/SOP/006, dated 07/01/2021. Section 6.8 of the procedure focuses on Traceability for documents and products. The procedure identifies critical control points to prevent the contamination of non-certified FFB. Records of CPO and PK sold were reviewed as follows: CPO <table><tr><td>Date</td><td>22/08/2023</td><td>22/08/2023</td></tr><tr><td>Receipt No</td><td>00322XXX</td><td>00322XXX</td></tr><tr><td>Buyer</td><td>FGV Bulkers</td><td>FGV Bulkers</td></tr><tr><td>Lorry No</td><td>WAXXXXA</td><td>WRTXXXX</td></tr></table>	Date	22/08/2023	22/08/2023	Receipt No	00322XXX	00322XXX	Buyer	FGV Bulkers	FGV Bulkers	Lorry No	WAXXXXA	WRTXXXX	Complied
Date	22/08/2023	22/08/2023													
Receipt No	00322XXX	00322XXX													
Buyer	FGV Bulkers	FGV Bulkers													
Lorry No	WAXXXXA	WRTXXXX													

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Criterion / Indicator		Assessment Findings			Compliance
		Weight	41.83 MT	38.21 MT	
		PK			
		Date	23/08/2024	26/07/2024	
		Receipt No	04008XXX	04008XXX	
		Buyer	FGV K. Semambu	FGV K. Semambu	
		Lorry No	VACXXXX	WUJXXXX	
		Weight	37.14 MT	47.04 MT	
4.3 Principle 3: Compliance to legal requirements					
Criterion 4.3.1 – Regulatory requirements					
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	The legal compliance of FGVPISB Bukit Sagu POM were monitored by the management to ensure compliance to all applicable legal requirements. Sample of legal requirements were verified at the mill. Licenses and Permits were renewed and remained active at the time of the assessments. Among the License and Permits sampled as below. 1. MPOB License #500202104000 valid from 01/04/2024 to 31/03/2025. 2. Diesel permit #KPDNPHG.600-8/3/130 valid from 14/03/2024 until 13/03/2025. 3. Compliance Schedule #006782 valid until 30/06/2025. 4. Weighbridge calibration #150660 inspected by De Metrology dated 05/03/2024. 5. Energy Commission Permit #2024/00222 valid until 23/02/2025.			Complied

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Criterion / Indicator		Assessment Findings	Compliance
		6. Water abstraction License #0024 valid until 31/12/2024. 7. Competence person #CePSWaM/05061 to Assistant Engineer NRIC 870612-XX-XXXX dated 25/08/2022. 8. Competence person #CePPOME/XXXXX to Manager NRIC 740403-XX-XXXX. 9. Competence Person #HQ/22/AGTES/00/15969 to Assistant Engineer NRIC 870612-XX-XXXX dated 25/08/2022. 10. Wages Deduction Permit #BHG.PU/9/129Jld46(57) dated 30/10/2018. 11. Competence person Steam Engineer #022/2011 to Manager NRIC 740403-XX-XXXX dated 19/04/2011.	
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -	FGV Holdings Berhad has implemented a centralized system to track legal changes, as outlined in the "SOP Perundangan Kelestarian, No: FGV/GSD-SR/SOP/16 dated 28/06/2022". Any updates to relevant regulations are managed through the Sustainability, Compliance, and Certification Department and the Operating Units. All legal requirements are recorded in the Legal and Other Requirement Register, which is maintained at the mill. The register is regularly reviewed and updated whenever new or amended legal requirements apply to mill operations.	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	FGV Holdings Berhad has established a centralized system for tracking legal changes, as outlined in the "SOP Perundangan Kelestarian, No: FGV/GSD-SR/SOP/16 dated 28/06/2022". Any updates to relevant regulations are managed by the Sustainability, Compliance, and Certification Department in coordination with the Operating Units.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - Minor compliance -	The tracking system for identifying changes in relevant regulations is available through the head office and website, with updates communicated from the Group Head Office. On-site verification, including interviews with office personnel and a review of records, confirms that the system is suitable for the operations and is well implemented. At FGVPIB Bukit Sagu POM, Mr. Masnawi Bin Abd Jabar was appointed as the Person in Charge for Legal Compliance, as outlined in the appointment letter dated 23/08/2023, signed by the Mill Manager. His job responsibilities include ensuring compliance with legal requirements within the mill.	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	Bukit Sagu POM land title is such as follow: <ul style="list-style-type: none"> Lot number: PT 1129 No. H.S.(D): 17XXX Validity: 28/6/2064 Syarat-syarat nyata: Tapak Kilang Kelapa Sawit Ownership: Felda Palm Industries Sdn Bhd Sighted the Surat Perjanjian antara Lembaga Kemajuan Tanah Persekutuan (Felda) dan Felda Palm Industries Sdn Bhd, dated 25/11/1996 is available as per audit. There was no evidence that the oil palm milling activities are diminishing the land use rights of other users.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.	The mill management has provided showing legal ownership of the land. Sighted Bukit Sagu POM land title is such as follow:	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<ul style="list-style-type: none"> Lot number: PT 1129 No. H.S.(D): 17xxx Validity: 28/6/2064 Syarat-syarat nyata: Tapak Kilang Kelapa Sawit Ownership: Felda Palm Industries Sdn Bhd <p>Sighted the Surat Perjanjian antara Lembaga Kemajuan Tanah Persekutuan (Felda) dan Felda Palm Industries Sdn Bhd, dated 25/11/1996 is available as per audit. Sighted the quit rent bil dated 21/05/2024 for lot number: PT 0001129 is available.</p>	
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The mill has demarcated the boundaries using the pole and seen the boundary map, photo evident of the poles and the monitoring record of the boundary on yearly basis.	Complied
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There was no land dispute reported during the time of audit. Identification and Negotiation of Land Dispute Procedure with Doc. No.: FGV/ML-1A/L2-Pr10 dated 01/06/2016 was developed in case of any disputed raised.	N/A
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	Not applicable as land issues is handled by the Genting Ayer Item Oil Mill.	N/A

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Criterion / Indicator		Assessment Findings	Compliance
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	Not applicable as land issues is handled by the Genting Ayer Item Oil Mill.	N/A
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	Not applicable as land issues is handled by the Genting Ayer Item Oil Mill.	N/A
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Assessment was based on the SIA Guidance; SOP No: FGV/GSD-SCCD/GL/02, Version: 0.0, effective date: 08/03/2021. There was a Social Impact Assessment (SIA) for Bukit Sagu Complex consist of FGVPI Bukit Sagu Palm Oil Mill, FGVPM Bukit Sagu 04 Estate, FGVPM Bukit Sagu 06 Estate, FGVPM Bukit Sagu 07 Estate and FGVPM Bukit Sagu 08 Estate by Wan Nur Aimey Nadiah Wan Solah and Mohd Afif Razmi of Sustainability Compliance & Certification Department, Group Sustainability Division, FGV Holdings Berhad. Sighted the SIA report: Final report – September 2024. It was noted the social impacts have identified and plans have been implemented to mitigate the negative impacts and promote the positive ones as referred in the document of <i>Pelan Mitigasi Syor Penambahbaikan Impak Sosial (Negative)</i> and <i>Pelan Mitigasi Syor Penambahbaikan Impak Sosial (Positif)</i> and <i>Pelan Tindakan Pegurusan Impak Sosial</i> . Sampled of negative impacts as below: 1. Issue:	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>The issue of discipline among FFB truck drivers who do not adhere to the full PPE wearing procedures while inside the factory premises complicates matters for the auxiliary police.</p> <p>Mitigation Plan for Improvement Recommendations:</p> <ul style="list-style-type: none"> The factory management has taken proactive measures by not allowing truck drivers who fail to follow instructions to enter the factory premises. <p>Management Plan for negative impact:</p> <ul style="list-style-type: none"> Continuous monitoring from auxiliary policy. 	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>FGV Holdings Berhad has established SOP for handling complaint and grievance (Group Grievance Management SOP); SOP no.: FGV/GGD/SOP/20, Version No.: 0, effective date: 03/01/2024. The procedure is to provide a system for the internal or external stakeholders concerning FGV Group, its employees, contractors, consultant suppliers, vendors and any other third-parties associated with FGV to lodge complaint and grievances to the management. Ranking and classification of the grievance will be ranked according to the severity and urgency of handling and classified into categories that reflect the nature of the complaint as per stipulated in the clause 8.0 Ranking and Classification of Grievance. Besides, grievance reporting channels were published in the company's website, https://www.fgvholdings.com/whistleblowing/. The FGV Holdings Berhad Whistleblowing Policy; Policy # FGV/GGD/POL/001; Rev. # 8.0; Effective date: 17/11/2020. The channels of reporting such as through letter, email, in person or Hotline Toll Free call. The whistleblowing e-form was available in</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		https://www.fgvholdings.com/sustainability/grievance/# for the stakeholders to report a grievance.	
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	The mill implemented Complaint Book to record any external complaints and Complaint Form for workers including housing defect. Reviewed the evidence of actions taken found that the complaint was resolved in timely manner. Sample of the complaint recorded (form number: 01125457563) on 20/05/2024 regarding leakage of piping in the master bedroom was resolved on 25/05/2024.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	There was a Complaint Box in front of the security post with Complaint Form available. The stakeholders and workers have access to the form to lodge complaint if any. A memo dated was issued to stakeholders to explain the method on reporting complaint and grievances. The mill also has conducted the complaint and grievance briefing to all employees and workers of the mill on 25/01/2024. Sighted the training record of "Taklimat Kesedaran Menangani Gangguan Seksual dan Keganasan Rumah tangga, Prosedur Menangani Rungutan dan Aduan".	Complied
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -	Employees and the surrounding communities were made aware that complaints or suggestions can be made any time via briefing made during latest Stakeholder Meeting as per Minutes of Meeting records of Laporan Program Konsultasi Bersama Pihak Berkepentingan Mengenai Komitmen Kelestarian FGV; Kompleks Bukit Sagu, Kompleks Panching & Kompleks Neram; Date: 05/09/2023; Venue @ Dewan Auditorium Akademi Latihan FGV (ALAF), Jalan Bukit Kuantan, 26050 Kuantan, Pahang. The mill also has conducted the complaint and grievance briefing to all employees and workers of the mill on 25/01/2024. Sighted the	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		training record of "Taklimat Kesedaran Menangani Gangguan Seksual dan Keganasan Rumahtangga, Prosedur Menangani Rungutan dan Aduan".	
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	Records of complaint in Bukit Sagu POM sighted available for the past 24 months.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance -	Contributions made based on consultation with local communities as per sample as following: - Hamper for bowling tournament for Gabungan Pergerakan Wanita (GPW) Felda on 10/01/2024	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. - Major compliance -	FGV Holdings Berhad has established the Peryataan Polisi Kesihatan Dan Keselamatan, signed by the Group CEO on 03/10/2022. This policy has been communicated to workers through induction training for new employees, morning briefings, and displays on various notice boards within the mill compound. The SCC Department is committed to improving safe working conditions by implementing various working standards through procedures and pictorial methods.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Additionally, the mill has developed a Safety and Health Management Plan, documented in the Environment, Safety, and Health Plan FY 2024. This management plan includes:</p> <ul style="list-style-type: none"> • ESH Risk Management • Emergency Response Procedure • Chemical Safety Management • Noise Boundary Monitoring • Health Monitoring 	
4.4.4.2	<p>The occupational safety and health plan should cover the following:</p> <p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risk of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:</p> <p>ii. All employees involved are adequately trained on safe working practices;</p> <p>iii. All precautions attached to products should be properly observed and applied;</p> <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health</p>	<p>The occupational safety and health plan cover the following:</p> <p>a. FGV Holdings Berhad have established the Pernyataan Polisi Kesihatan Dan Keselamatan signed by the Group CEO on 03/10/2022. The policy has been communicated to the staffs and workers through induction training for new workers, morning briefing and displayed at various notice boards within the mill compound. The policy has been briefed to all workers on FGV PISB Bukit Sagu POM on 19/04/2024.</p> <p>b. FGV PISB Bukit Sagu POM have conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment covers all main operations and support operations. Latest reviewed has been done on 29/12/2022. Among the activities verified in the HIRARC included FFB Ramp, Sterilizer, Laboratory and Workshop. HIRARC is reviewed on annually and as and when there are any accidents that occur in the mill.</p> <p>FFB Supplier Lorry was not equipped with safety matters.</p> <p>During the site visit, it was observed that one lorry used for transporting FFB was operating without a door, which does not</p>	Major Non Compliance

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Criterion / Indicator	Assessment Findings	Compliance
<p>(Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>comply with the HIRARC dated 29/12/2022, Section 1: "Pergerakan Lori: Lori yang digunakan perlu dalam keadaan selamat untuk digunakan setakat yang praktikal."</p> <p>Thus, Major Nc was raised.</p> <p>Additionally, it was noted that an FFB lorry driver was wearing sandals within the mill. This practice does not align with the Procedure Mill Entrance Control dated 14/05/2022, Section 6.1.4: "Pemandu dan orang berkaitan hendaklah memakai PPE yang lengkap seperti kasut dan topi keselamatan serta pakaian yang sesuai dengan aktiviti kerja di kilang."</p> <p>Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the mill.</p> <p>The Chemical Health Risk Assessment Report conducted by Occumed Consultancy & Services Sdn Bhd on 30/05/2023 (Report Number: HQ/10/ASS/00/8 2023/041) was available for verification.</p> <p>Medical Surveillance was conducted for workers exposed to chemicals and fumes in the mill as recommended in the CHRA. The medical surveillance was conducted to monitor the level of exposure on the workers towards the chemicals and fumes.</p> <p>Medical Surveillance was conducted on 22-26/04/2024 at Klinik Shah for chemical handlers and workshop attendants who have been exposed to chemicals and fumes. Results indicated that no workers had abnormal results (Occupational or Non occupational caused) and all were fit to work.</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the mill.</p> <p>The NRA assessment was conducted on 25/07/2020 by Hitech Hesh Holding (M) Sdn Bhd. The assessment report was available for verification.</p> <p>Audiometric Test was done for workers exposed to excess noise at the workplace in compliance with the Noise Risk Assessment.</p> <p>Audiometric Assessment was conducted on 22-26/04/2024 for a total of 42 workers by Klinik Shah and the Audiometric Test Report was available for verification. The results indicated that 6 workers were diagnosed with STS. Retest has been conducted on 05-08/07/2024 and report was available for verification.</p> <p>c. The mill has established a training program for employees exposed to chemicals used at the palm oil mill to ensure continuous awareness to the employees. The training was conducted by the Manager, Asst. Manager, and representative from the chemical suppliers to the supervisors and operators. Sighted the training records as follows.</p> <ul style="list-style-type: none"> – Welding Safety Training dated 03/09/2024 – Working At Height Training dated 28/08/2024 <p>d. All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the site visit to the Mill Processing and visit to the stores of the mill, it was sighted that all required appropriate PPEs were worn by the personals. Interview with the workers indicated that they were aware on</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>the importance of PPE usage as a control measure to prevent or reduce risks associated to their daily work. They confirmed that all PPEs were provided without any deduction made to their respective salaries. PPE issuance records available in "FGVPM OSH: Peralatan Perlindungan Diri (PPE)" and workers' payslips were also verified to confirm their statements.</p> <p>e. Standard Operating Procedures for Handling of Chemicals were available in several documents. Refer Felda Global Venture Plantations (M) Sdn. Bhd. established Manual Procedure; Document Number: FGV/FGVPM/II/IMS/15/009 for Chemical Control. The procedure details the safe handling of agrochemicals which were verified to be in line with the USECHH Regulations 2000.</p> <p>Chemical was stored in drinking bottles.</p> <p>During the site visit to the workshop area, it was observed that two drinking bottles were being used to store diesel and lubricant, which does not comply with the Chemical Handling Procedure dated 14/05/2022, Section 6.5.2: "Dilarang menggunakan bekas makanan dan minuman bagi mengisi bahan kimia."</p> <p>Additionally, at the Water Treatment Plant, it was noted that the chemical Flocc was stored in an unlabeled container. This practice is not in line with the Chemical Handling Procedure dated 14/05/2022, Section 6.5.1: "Bahan kimia yang dipindahkan ke bekas lain hendaklah dilabel mengikut label asal bagi mengelakkan kekeliruan kepada petugas lain."</p> <p>Thus, Major Nc was raised</p> <p>f. Mill management has appointed Safety Committee Members</p>	

Criterion / Indicator		Assessment Findings	Compliance												
		<p>consists of OSH Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Mill Manager.</p> <p>The Mill Manager, En. Hartono Bin Hanafi was appointed to be the Chairman of OSH Committee at the mill as stated in the appointment letter dated 01/11/2022 undersigned by the Regional Controller 1, FGVPIB.</p> <p>g. The management conducted regular OSH committee meetings on quarterly basis and when necessary due to accidents that occur. The meeting discussed issues on employees' safety, health, and welfare such as operational risks and health achievement report, mill security, safety compliance by contractors, workplace inspection, legal compliance, safety, and health training.</p> <table><tr><td>2024</td><td>Date</td></tr><tr><td>1st Meeting</td><td>08/02/2024</td></tr><tr><td>2nd Meeting</td><td>03/05/2024</td></tr><tr><td>3rd Meeting</td><td>26/07/2024</td></tr><tr><td>2023</td><td>Date</td></tr><tr><td>4th Meeting</td><td>11/10/2023</td></tr></table> <p>h. Accident and Emergency procedures were available in the mill to address fire, accidents, chemical and oil spillages among others. The mill has established Emergency Response Team lead by the Mill Manager. Emergency Response Plans were available for incidents such as pesticides spillages, Fire, Explosions, Diesel Spillage and Accidents. The ERT chart and Fire Extinguisher Map was also available and verified.</p>	2024	Date	1 st Meeting	08/02/2024	2 nd Meeting	03/05/2024	3 rd Meeting	26/07/2024	2023	Date	4 th Meeting	11/10/2023	
2024	Date														
1 st Meeting	08/02/2024														
2 nd Meeting	03/05/2024														
3 rd Meeting	26/07/2024														
2023	Date														
4 th Meeting	11/10/2023														

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		<p>Emergency Response Training was conducted on 05/03/2024 for all workers at the mill.</p> <p>i. First aiders were assigned to various workstation at the mill. The mandores and staffs were responsible for first aid boxes at each workstation assigned to them by the management. The first aid box was recently replenished with all stated items available in the box. First Aid trainings were conducted regularly at the mill and documents of trainings were verified dated 25/08/2024.</p> <p>j. All accidents and incidents are reviewed during the quarterly safety meetings held in the operating units. Records of Lost Time Accidents (LTA) are maintained and presented at these meetings. Accident records have been updated and are available for verification. The JKPP 8 form has been submitted to DOSH for the year ending 2023 on 11/01/2024, with reference JKPP8/161152/2024. There were 1 reported accident cases for the year 2023 at the mill with LTA 37 days. The JKPP 6 form and the Accident Investigation Report are available for verification.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p>- Major compliance -</p>	<p>FGV Holdings Berhad has developed Group Sustainability Policy (Policy No.: FGV/GSD/POL/03, Rev. 5.0 dated 26/02/2024) where the company respect human rights by upholding international human rights principles and standards as encapsulated in the Universal Declaration of Human Rights (UDHR), and other applicable international human rights treaties, subject to the laws and regulations of the countries and territories in which FGV Group</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		operates. In fulfilling its responsibility to respect human rights, FGV Group is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs). Briefing of the policy to the workers was conducted on from time to time during daily muster assembly and workers meeting. Interview conducted with the workers confirmed that the management treated all the workers equally. Sighted the briefing record of "Taklimat Penerangan SIA dan GSP 5.0 Kesedaran RSPO dan MSPO & Polisi-polisi Syarikat" on 19/04/2024.	
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	FGV Holdings Berhad has developed Group Sustainability Policy (Policy No.: FGV/GSD/POL/03 Rev. 05 dated 26/02/2024 where the company where no person shall be subjected to any discrimination in employment, including hiring, compensation, advancement, training, disciplinary action, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, gender identity, nationality, political opinion, social group, ethnic origin, reproductive rights or other forms of discrimination. Briefing of the policy to the workers was conducted on from time to time during daily muster assembly and workers meeting. Interview conducted with the female and male workers confirmed that the management treated all the workers equally. Sighted the briefing record of "Taklimat Penerangan SIA dan GSP 5.0 Kesedaran RSPO dan MSPO & Polisi-polisi Syarikat" on 19/04/2024	Complied
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	The mill workers' pay and conditions are based on Collective Agreement between FGV Palm Industries Sdn. Bhd. with FGV Palm Industries Workers Union (Peninsular Malaysia); Period: 1/1/2022 to 31/12/2024. Sample of the workers is such as follow:	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ol style="list-style-type: none"> 1. Employee Id: 01213XXX <ul style="list-style-type: none"> • June: RM 2912.59 • July: RM 3057.35 • August: RM 3002.29 2. Employee Id: 01214XXX <ul style="list-style-type: none"> • June: not yet employed. • July: RM 1200.88 (new worker – 13 working days) • August: RM 2819.09 3. Employee Id: 01213XXX <ul style="list-style-type: none"> • June: 1813.32 • July: RM 1983.45 • August: RM 2078.72 4. Employee Id: 01209XXX <ul style="list-style-type: none"> • June: RM 3469.59 • July: RM 3663.90 • August: RM 3321.00 5. Employee Id: 01212XXX <ul style="list-style-type: none"> • June: RM 2463.79 • July: RM 2412.04 • August: RM 2793.26 6. Employee Id: 01201XXX <ul style="list-style-type: none"> • June: RM 4386.22 • July: RM 4628.55 • August: RM 4578.53 	

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance -	As per Supplier Code of Conduct, FGV Holdings Berhad; Doc. Version: 001.05.2020; Doc. Owner FGV Group Procurement. Verification of contractors' workers' pay documents confirmed that the salary met the Minimum Wage Order 2022. Sample contractors as following: Bxx Txxxxxxxx Exxxxxxxx Sdn Bhd for the month of July: 1. Employee id: P0XXX <ul style="list-style-type: none"> May: RM 2188.46 June: RM 2176.92 July: RM 2555.54 	Complied
4.4.5.5	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	Bukit Sagu POM management established records that provided accurate overview of all employees including contractors' workers. The records contained full names, gender, date of birth, date of entry, a job description, wage and the period of employment.	Complied
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records. - Major compliance -	Workers were given work agreement according to the company's policy, Collective Agreement and legal requirements of National Minimum Wage Order 2022 as per sample as per sample workers 7 samples among shift Process Operators, Pekerja Bergaji Hari (PBH) Boiler and office of FGVPI Bukit Sagu POM. Sample of the workers is such as follow: Evidence as below: 1) Employee Id: 1213XXX <ul style="list-style-type: none"> Date engaged: Signed by both parties: Yes 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Copy of contract agreement has been given: Yes 2) Employee Id: 1213XXX <ul style="list-style-type: none"> • Date engaged: • Signed by both parties: Yes • Copy of contract agreement has been given: Yes 3) Employee Id: 1212XXX <ul style="list-style-type: none"> • Date engaged: • Signed by both parties: Yes • Copy of contract agreement has been given: Yes 	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	Bukit Sagu POM has implemented "Punch Card" system to record the working hours and overtime for all the workers. The data was manually transferred from punch card to the Checkroll Pengiraan Gaji system for monitoring purposed. Sighted the record of Checkroll Pengiraan Gaji for the month of August is available as per audit.	Complied
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. - Major compliance -	Bukit Sagu POM has implemented "Punch Card" system to record the working hours and overtime for all the workers. The overtime was paid accordingly and mutually agreed by both parties. Employees who want to work overtime need to fill in the "Borang Persetujuan Bekerja Melebihi 12 Jam Sehari & Kerja Lebih Masa Pada Hari Cuti/Cuti Umum". No overtime has exceeded the allowable limit of 104 hours. Sample of the workers is such as follow: Employee id: <ul style="list-style-type: none"> • 1212XXX • 1213XXX 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Wages and overtime payment were clearly indicated in the payslip and all the payment was according to the legal requirements and Collective Agreement.	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. - Minor compliance -	The management has given bonus and yearly increment based on performance to the workers. Housing allowance (RM 100) was given to the workers that staying outside the living quarters provided by the mill management.	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	All workers are provided with housing facilities that furnish with sanitation facilities, water supplies and electricity. Water and electricity are connected to the national supply and grid. Water usage is subsidized by the company. Linesite inspection was carried out on weekly basis by using Rekod Pemantauan Perumahan Petugas/ Pekerja. Criteria to be checked are such as building, electric and wiring, water and the cleanliness of the compound. Reviewed the inspection records found the correlation between the checklist record and the actual condition.	Complied
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	FGV Holdings Berhad has developed Group Sustainability Policy (Policy No.: FGV/GSD/POL/03, Rev. 5.0 dated 02/02/2024) where the company shall not tolerate any form of harassment and abuse including physical, sexual, psychological or verbal. Everyone shall be treated with respect and dignity. Sighted latest minutes of meeting for gender committee (Jawatankuasa Kelab Keluarga Dayabudi (KKD)); Ref: 02/2024; date: 21/01/2024; Venue: Dewan KKD. Complaint process for sexual harassment was established and briefed to the committee during the meeting. Briefing of sexual	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		awareness was conducted on 25/01/2024	
4.4.5.13	<p>The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>All employees in the mill to join and participate in the trade unions. Interviews with the management and selected employee reveal that no restrictions were in place for these categorize of employees to join and participate the established trade unions. In addition, the sampled and reviewed employment contracts indicate no written terms and conditions on prohibition of employees to join and participate in the trade unions.</p> <p>The Free Voice and Trade Union Join Policy had been established and implemented for the estates. The policy (Policy No.: FGV/SED/POL/001, Rev. No.: 4, Effect. Date: 17/11/2020) as signed by Dato' Mohd Nazrul Izam Mansor, Chief Executive on 03/10/2022 and has been displayed prominently on notice boards in local language Bahasa Malaysia.</p> <p>Sighted the above policy briefing to all workers of Bukit Sagu POM which was done on 19/04/2024. The mill has also conducted the briefing for collective agreement for the workers. Sighted the broefong record of "Penerangan CA Artikel 38 – Artikel 39" on 02/08/2024 by Mr. Ahmad Sharuni Bin Pipit (Union Secretary). Union meeting was conducted on 28/05/2024. Sighted the minute meeting of "Mesyurat Jawatankuasa Kerja Agung Kali Ketiga Sesi 2022 -2025".</p>	Complied
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p>- Major compliance -</p>	<p>FGV Holdings Berhad has developed Group Sustainability Policy (Policy No.: FGV/GSD/POL/03, Rev. 5.0 dated 02/02/2024) where the company is committed to employing only persons of the age of 18 and above, FGV recognises that Malaysian laws allow for young persons to be engaged in certain forms of employment. Therefore, no person shall be employed under the age of 15, and any</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																
		employment of young persons shall not be in a manner that is likely to be hazardous, or to interfere with such person’s education, or to be harmful to the person’s health or physical, mental, spiritual, moral, or social development at any stage of the employment. Besides, the contractors/ third party service provider have signed on the Supplier Code of Conduct, FGV Holdings Berhad where prohibition of child labour who under the age of 18. Document reviewed on the master list of employees and the contractor’s workers found that no child labour sighted. Briefing regarding children and young persons was conducted on 23/04/2024. Sighted the briefing record of “Taklimat Garis Panduan FGV Tentang Menghormati dan Melindungi Hak Kanak-Kanak” is available as per audit.																	
Criterion 4.4.6: Training and competency																			
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance -	<p>All employees and contractors undergo proper training. The Mill management has established a training matrix and training program for the year 2023 and 2024 to ensure that relevant and necessary training is provided to individuals.</p> <p><u>Bukit Sagu POM</u></p> <table><tr><th>Training</th><th>Date</th></tr><tr><td>Fire Drill Training</td><td>05/03/2024</td></tr><tr><td>Safety & Health Plan Training</td><td>05/03/2024</td></tr><tr><td>Insurance & Accident Training</td><td>16/02/2024</td></tr><tr><td>Grievance Mechanism Training</td><td>27/04/2024</td></tr><tr><td>Spillage Drill</td><td>08/05/2024</td></tr><tr><td>Hearing Conservation Programme</td><td>24/05/2024</td></tr><tr><td>RTE, CABI Endangered Species Training</td><td>08/08/2024</td></tr></table>	Training	Date	Fire Drill Training	05/03/2024	Safety & Health Plan Training	05/03/2024	Insurance & Accident Training	16/02/2024	Grievance Mechanism Training	27/04/2024	Spillage Drill	08/05/2024	Hearing Conservation Programme	24/05/2024	RTE, CABI Endangered Species Training	08/08/2024	Complied
Training	Date																		
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Criterion / Indicator		Assessment Findings		Compliance
		PPE Training	09/08/2024	
		SW Management Training	10/08/2024	
		First Aid Training	25/08/2024	
		Welding training	03/08/2024	
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	The mill has developed a comprehensive training program for mill executives, workers, and contractors, based on a detailed training needs analysis. This analysis is documented in the Training Matrix Analysis, which considers job designations and identifies various training needs for employees. The training types are categorized into three groups: <ul style="list-style-type: none">• Core Training• Non-Core Training – Theoretical• Non-Core Training – Theoretical and Hands-On The identified training needs have been planned and implemented accordingly.		Complied
4.4.6.3	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure. - Minor compliance -	The mill maintains an annual training program that is updated based on a training needs analysis. Identified training sessions are scheduled throughout the year, with the most recent programming dated January 2024. This approach ensures that training initiatives are aligned with the evolving needs of the estate's workforce.		Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services				
Criterion 4.5.1: Environmental Management Plan				

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Criterion / Indicator		Assessment Findings	Compliance
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	<p>There is an Environmental Policy titled Pernyataan Polisi Alam Sekitar FGV Holdings Berhad for the mill issued and endorsed in 03/10/2022 by the Ketua Pegawai Eksekutif Kumpulan of FGV.</p> <p>There in the policy among others stated that the Company is committed:</p> <ol style="list-style-type: none"> 1) Comply with all applicable environmental, regulation, and other requirements throughout our business operations; 2) Implement sound environmental management plan by adhering to FGV Group Sustainability Policy; 3) Ensure protection of the environment including prevention of pollution by eliminating or minimizing any potential adverse effects associated with our activities, products, and services; 4) Encourage our value chain partners to integrate environmental considerations in every facet of their business to reduce environment impact; 5) Promote and environmentally conscious workplace to all employees and workers through their active involvement and participation in environmental awareness and training programs; and 6) Continually improve the environmental management system to enhance environmental performance. <p>The policy has been communicated on 19/04/2024 during morning briefing at Bukit Sagu POM.</p>	Complied
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations	<p>The Policy is available, and objectives stated therein. Among others the objectives are to comply with DOE regulatory requirement. Initiative in plan as tabled below; In addition, the mill has initiated</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance												
	- Major compliance -	<p>the following projects for enhancement to the environmental issues.</p> <p>The environmental aspects and impact evaluation has been established for the mill operations covering activities in relation to reception, sterilization, oil room operation, kernel processing, boiler operation, power generation, crude palm oil storage leakage and spillage, ruptured, effluent pond operations and diesoline storage tank. The list was reviewed on 07/01/2024.</p>													
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p>- Major compliance -</p>	<p>The mill monitors aspects and impacts among others the following activities This plan is available and similar to the reduction of pollution and emission. Mainly the areas relating to significant impact to the environment and the effort implemented are summarized below.</p> <table border="1"> <thead> <tr> <th>No</th><th>Environmental Issue</th><th>Solution/Action Plan</th><th>Location</th></tr> </thead> <tbody> <tr> <td>1</td><td>Water Quality</td><td>Continuous monitoring water quality at identified points of river for detection of quality/pollution Analysis made at certified laboratory Advisory/guidance from Health Ministry</td><td>River, Water Treatment Plant</td></tr> <tr> <td>2</td><td>Air Quality</td><td>Adherence to the legislative</td><td>Boiler operation mill complex</td></tr> </tbody> </table>	No	Environmental Issue	Solution/Action Plan	Location	1	Water Quality	Continuous monitoring water quality at identified points of river for detection of quality/pollution Analysis made at certified laboratory Advisory/guidance from Health Ministry	River, Water Treatment Plant	2	Air Quality	Adherence to the legislative	Boiler operation mill complex	Complied
No	Environmental Issue	Solution/Action Plan	Location												
1	Water Quality	Continuous monitoring water quality at identified points of river for detection of quality/pollution Analysis made at certified laboratory Advisory/guidance from Health Ministry	River, Water Treatment Plant												
2	Air Quality	Adherence to the legislative	Boiler operation mill complex												

Criterion / Indicator		Assessment Findings				Compliance																								
				requirement on boiler emission Prohibition of open burning Fibre and shell are used as fuel in the boiler furnace Monitoring of CEMS system																										
		3	Schedule Waste	Scheduled wastes are managed in accordance with the regulatory requirements.	Source of generation/store.																									
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Details are included in the continual improvement plan. Details as summarized below: <table><tr><td>No</td><td>Projects</td><td>Details</td></tr><tr><td>1</td><td>Environment</td><td>Installed Moving Floor Boiler – Efficiency of Fuel Combustion</td></tr><tr><td>2</td><td>Environment</td><td>Installed ESP Boiler – Dust Particulate Control</td></tr><tr><td>3</td><td>Environment</td><td>Annual Effluent Pond Desludging</td></tr><tr><td>4</td><td>Environment</td><td>Effluent Pond Daily Performance Monitoring</td></tr><tr><td>5</td><td>Environment</td><td>Final Discharge Flowmeter</td></tr><tr><td>6</td><td>Environment</td><td>Weekly Lab External Sampling</td></tr><tr><td>7</td><td>Environment</td><td>EFB supplied to plantation – For mulching.</td></tr></table>				No	Projects	Details	1	Environment	Installed Moving Floor Boiler – Efficiency of Fuel Combustion	2	Environment	Installed ESP Boiler – Dust Particulate Control	3	Environment	Annual Effluent Pond Desludging	4	Environment	Effluent Pond Daily Performance Monitoring	5	Environment	Final Discharge Flowmeter	6	Environment	Weekly Lab External Sampling	7	Environment	EFB supplied to plantation – For mulching.	Complied
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Criterion / Indicator		Assessment Findings			Compliance
		8	Environment	Land dripping Irrigation – No discharge to river/waterways	
		9	Environment	Annual Mill and boiler inspection – To comply JKKP compliance and improve mill processing efficiency.	
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - Major compliance -	A training program is available in the Training Program updated on a yearly basis or revised as per the management requirement. Included in this programme are subjects related to environment e.g. environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training. Other training organised in relation to environmental issues and activities among other as listed below:			Complied
		No	Type of Training	Date	
		1	RTE, Wildlife Training	08/08/2024	
		2	Schedule Waste Training	10/08/2024	
		3	Fire Drill, Open Burning Briefing	05/03/2024	
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	The environmental issues are discussed in a meeting by the EPMC. (Environmental Performance Monitoring Committee) Meeting is held 4x /year. The agenda discussed among others as follows: a) Matters arising b) Performance of environment compliance c) Report on environmental pollution d) Self-compliance checklist performance e) Effluent treatment/ clean air/ scheduled waste f) Audit report on EMS/ RSPO/ MSPO			Complied

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Criterion / Indicator		Assessment Findings	Compliance									
		<p>g) Domestic waste issues</p> <p>Sighted minutes of meeting dated 16/06/2024 and 13/03/2024 among others discussing the following:</p> <ul style="list-style-type: none">• Effluent treatment and performance• Scheduled wastes and others waste management										
Criterion 4.5.2: Efficiency of energy use and use of renewable energy												
4.5.2.1	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period</p> <p>- Major compliance -</p>	<p>The monitoring is recorded in environment performance indicator electricity generated by steam turbine tabulated for the financial year Jan-Dec.</p> <p>It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt FFB.</p> <p>A monthly record on energy consumption for both renewable and non-renewable sources were also maintained documented. It is monitored to optimize use of renewable energy. The data is compiled for comparison and control for future improvement with aim of gradual reduction particularly diesel. Under the annual energy management plan 2024 the mill aimed for reduction plan among others:</p> <p>a) Educate workers on fuel saving practice.</p> <p>b) Avoid leakages during vehicles maintenance.</p> <p>Sample taken from the diesel and electricity consumption is as the following:</p> <table><tr><td>Month</td><td>Diesel (liter/FFB)</td><td>Electric (kWh/mt FFB)</td></tr><tr><td>July 2024</td><td>0.74</td><td>1.63</td></tr><tr><td>June 2024</td><td>0.79</td><td>1.69</td></tr></table>	Month	Diesel (liter/FFB)	Electric (kWh/mt FFB)	July 2024	0.74	1.63	June 2024	0.79	1.69	Complied
Month	Diesel (liter/FFB)	Electric (kWh/mt FFB)										
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June 2024	0.79	1.69										

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Criterion / Indicator		Assessment Findings			Compliance															
		May 2024	1.33	2.17																
		April 2024	0.97	1.12																
4.5.2.2	<p>Palm oil millers shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations.</p> <p>- Major compliance -</p>	<p>The mill records the following data and tabulated the ratio against the FFB processed to determine the efficiency of their operations:</p> <p>a) All the diesel used (non-renewable) for the mill operations</p> <p>b) Fibre/shell used (renewable)</p> <p>The utilization of fossil fuel in 2024 is being monitored. The management has established the baseline of the consumption. The estimation of diesel and electric consumption is details in the budget book.</p> <p>Baseline figure established accordingly using a moving average for the electricity and diesel. Sample of the baseline established is as the following.</p> <table><tr><td>Month</td><td>Diesel (liter/FFB)</td><td>Electric (kWh/mt FFB)</td></tr><tr><td>July 2024</td><td>1.24</td><td>0.49</td></tr><tr><td>June 2024</td><td>1.18</td><td>0.26</td></tr><tr><td>May 2024</td><td>1.17</td><td>0.48</td></tr><tr><td>April 2024</td><td>1.51</td><td>0.52</td></tr></table>			Month	Diesel (liter/FFB)	Electric (kWh/mt FFB)	July 2024	1.24	0.49	June 2024	1.18	0.26	May 2024	1.17	0.48	April 2024	1.51	0.52	Complied
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4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p>	<p>The fibre and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fibre are delivered to estates for multi purposes or sold to outside buyers. EFB is used in the estates for mulching.</p>			Complied															
Criterion 4.5.3: Waste management and disposal																				
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p>	<p>Bukit Sagu POM had identified all wastes and sources of pollution. The Waste Management Action Plan 2024 were established on</p>			Complied															

Criterion / Indicator		Assessment Findings				Compliance
	- Major compliance -	09/01/2024 to mitigate and control the identified wastes and source of pollution. The common significant environmental receptors for the estates and mill operations among others as summarized below:				
		Source	Type of waste	Action Plan	Status	
		1. Mill Operation	POME, shell, black soil and EFB	1. To record and disposed. 2. Awareness training on SW.	On going	
			Tire	1. To reuse as decoration 2. Collect and sell to competence contractor.	On going	
			Scrap Iron	Collect and sell to competence contractor.	On going	
		2. Office and line-site.	Paper	Burn as boiler starter	On going	
			Electronic items	Disposed as Schedule Waste.	Disposed on September 2023	

Criterion / Indicator		Assessment Findings				Compliance
			Sisa Pukal (from house furniture)	Collect and sell as recycle item.	On going	
			Domestic Waste	1. Collect and sent to Majlis disposed area. 2. Planning on scheduling the collection.	On going	
		All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2024 reviewed annually. The waste generated from the mill/estates operations as shown below:				
		No	Type of waste	Details		
		1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries		
		2	Domestic waste	rubbish from the mill/estate complex and employees' quarters		
		3	Industrial waste	Fiber, palm kernel shell, boiler ash, scrap iron		
		4	Sewage	Sewage from housing/office complex		
		The pollution identified from the mill/estate activities:				
		No	Type of waste	Details		
1	Black smoke	Emission from boilers/ vehicles/ engines				
2	Odor gas from effluent	Effluent treatment.				
3	Leakage of Lubricant.	Proper storage and maintenance.				

Criterion / Indicator		Assessment Findings	Compliance												
4.5.3.2	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p>- Major compliance -</p>	<p>Bukit Sagu POM had identified all wastes and sources of pollution. The Waste Management Action Plan 2024 were established to mitigate and control the identified wastes and source of pollution. The common significant environmental receptors for the estates and mill operations among others as summarized below:</p>	Minor Non Compliance												
		<table><tr><th>No</th><th>Receptor</th><th>Sources</th></tr><tr><td>1</td><td>Air</td><td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)-GHG</td></tr><tr><td>2</td><td>Water</td><td>Cleaning water/ run-off/process station waters (hydro-cyclone/ sterilizer condensate/ clarification waste) & 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></table>		No	Receptor	Sources	1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)-GHG	2	Water	Cleaning water/ run-off/process station waters (hydro-cyclone/ sterilizer condensate/ clarification waste) & boiler quenching water and blow down	3	Land	Scheduled waste, domestic waste and industrial/ process waste.
		No		Receptor	Sources										
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3	Land	Scheduled waste, domestic waste and industrial/ process waste.													
<p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan 2024 reviewed annually. The waste generated from the mill/estates operations as shown below:</p>															
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Criterion / Indicator		Assessment Findings	Compliance										
		The review of the Waste Management Plan highlights that Empty Fruit Bunches (EFB) are identified as waste, with handling methods including selling to external parties or disposal within the estate. However, during a site visit to the upstream sample point at Sungai Batu, it was observed that old EFB had been dumped along the roadside, which is not in accordance with the management plan. Thus, Minor NC was raised.											
4.5.3.3	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005 - Major compliance -	<p>Bukit Sagu POM had established SOP for chemical handling. The SOP of handling of chemicals is available in the following document</p> <p>a) Manual Ladang Sawit Lestari</p> <ul style="list-style-type: none">• Prosedure Kerja Selamat <p>b) Manual Sustainability</p> <ul style="list-style-type: none">• Prosedur Kerja Selamat• Prosedur Penyimpanan/ Penggunaan Racun <p>The scheduled waste is disposed to Penxxx Floxx (Kuantan) Sdn Bhd registered with DOE. DOE letter of authorization to Penxxx Floxx (Kuantan) Sdn Bhd for SW collection ref no: 202408091104ICT5 / 2024080911PT276G/ 2024080910E0M57 dated 09/08/2024. Details of scheduled waste dispatched as recorded below. The duration of storage is in line with the date of generation.</p> <table><tr><th>No</th><th>Date</th><th>SW 305</th><th>SW 410</th><th>SW 409</th></tr><tr><td>1</td><td>09/08/2024</td><td>0.348</td><td>0.0530</td><td>0.208</td></tr></table>	No	Date	SW 305	SW 410	SW 409	1	09/08/2024	0.348	0.0530	0.208	Complied
No	Date	SW 305	SW 410	SW 409									
1	09/08/2024	0.348	0.0530	0.208									

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Criterion / Indicator		Assessment Findings	Compliance																		
		Verified mill has registered with E-Swiss. File reference: JAS.CHQ.600-3/1/42 date submission – 09/09/2024 for the submission of September 2024.																			
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	Domestic waste for the mill and housing complex are disposed at Majlis Daerah Kuantan landfill collected 2x per week via contractor BXX Technologies Sdn Bhd.	Complied																		
Criterion 4.5.4: Reduction of pollution and emission including greenhouse gas																					
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	<p>The polluting activities are identified and documented in the Environmental Aspect & Impact Identification. From the EAI, it will be evaluated for the impact and any impact will be included in the management plan. The evaluation is documented in the Environmental Impact Evaluation. All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2024 reviewed annually. The waste generated from the mill/estates operations as shown below:</p> <table><tr><th>No</th><th>Type of waste</th><th>Details</th></tr><tr><td>1</td><td>Scheduled waste</td><td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td></tr><tr><td>2</td><td>Domestic waste</td><td>rubbish from the mill/estate complex and employees’ quarters</td></tr><tr><td>3</td><td>Industrial waste</td><td>Fiber, palm kernel shell, boiler ash, scrap iron</td></tr><tr><td>4</td><td>Sewage</td><td>Sewage from housing/office complex</td></tr></table> <p>The pollution identified from the mill operations/ activities:</p> <table><tr><th>No</th><th>Type of waste</th><th>Details</th></tr></table>	No	Type of waste	Details	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	2	Domestic waste	rubbish from the mill/estate complex and employees’ quarters	3	Industrial waste	Fiber, palm kernel shell, boiler ash, scrap iron	4	Sewage	Sewage from housing/office complex	No	Type of waste	Details	Complied
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No	Type of waste	Details																			

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Criterion / Indicator		Assessment Findings					Compliance
		1	Black smoke	Emission from boilers/ vehicles/ engines			
		2	Odor gas from effluent	Effluent treatment.			
		3	Leakage of Lubricant.	Proper storage and maintenance.			
		The mill also monitored and maintained records on Palm GHG. Inclusive in the report are the plantation/ field emission data from field emission and sinks (tCO2e/t FFB) and mill emission from mill emission and credits (tCO2e/t FFB).					
		From the Stack Air Emission Monitoring Report Felda Palm Industries Sdn Bhd Bukit Sagu POM, date conducted 28/02/2024, report no: STK/BSAGU/24/001. From the air emission monitoring, the purpose of the report to measure the total Particulate Matter (PM) emitted from stack at Boiler No. 3 at based on 150/mg/m³ as per stated in the "Second Schedule, Regulation 13 of the Environment Quality (Clean Air) Regulation 2014."The boiler needs to be sampled every twice a year (2x/year) according to the Department of Environment requirement. The result of sampling as table below:					
		Boiler	Sampling Date	Results (mg/m³)	Limit	Compliance Status	
		Boiler 1	28/02/2024	159.8	150	Not Complied	
		Boiler 2	28/02/2024	117. 3	150	Complied	
		The management has currently installed the Electrostatic Precipitator (ESP) for the Boiler No 1.					
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented.	The polluting activities are identified and documented in the Environmental Aspect & Impact Identification. From the EAI, it will					Complied

Criterion / Indicator		Assessment Findings	Compliance																		
	- Major compliance -	<p>be evaluated for the impact and any impact will be included in the management plan. The evaluation is documented in the Environmental Impact Evaluation. All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2024 reviewed annually. The waste generated from the mill/estates operations as shown below:</p> <table> <tr> <th>Source</th><th>Type of waste</th><th>Action Plan</th><th>Status</th></tr> <tr> <td rowspan="3">Mill Operation</td><td>Used PPE, Cotton Rag, Hydraulic Oil, Lubricant, Filter</td><td>To monitor the PPE Record, To dispose through SW.</td><td>On going</td></tr> <tr> <td>Used Chemical container, used chemical</td><td>To disposed through SW.</td><td>On going</td></tr> <tr> <td>3Scrap Iron</td><td>Collect and sell to competence contractor.</td><td>On going</td></tr> <tr> <td></td><td>Sisa Domestic</td><td>Collect and sent to Majlis disposed area. Planning on scheduling the collection.</td><td>On going every twice, a week.</td></tr> </table> <p>All efforts and action plan for the identified pollutants and emission above at current is adequate to comply with the requirement. All identified issues have significant impacts to the environment.</p>	Source	Type of waste	Action Plan	Status	Mill Operation	Used PPE, Cotton Rag, Hydraulic Oil, Lubricant, Filter	To monitor the PPE Record, To dispose through SW.	On going	Used Chemical container, used chemical	To disposed through SW.	On going	3Scrap Iron	Collect and sell to competence contractor.	On going		Sisa Domestic	Collect and sent to Majlis disposed area. Planning on scheduling the collection.	On going every twice, a week.	
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Criterion / Indicator		Assessment Findings	Compliance																																				
4.5.4.3	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p>- Major compliance -</p>	<p>Palm oil mill effluent (POME) is treated to ensure compliance with the DOE standards. Interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements.</p> <p>a) No overflow was observed, and flow meter reading was recorded daily. Submission to DOE is made through Borang Penyata Suku Tahunan</p> <table border="1"> <thead> <tr> <th>Sample Date</th><th>Standard</th><th>22/07/2024</th><th>24/06/2024</th></tr> </thead> <tbody> <tr> <td>pH</td><td>5-9</td><td>8.52</td><td>8.42</td></tr> <tr> <td>BOD</td><td>100</td><td>90</td><td>69</td></tr> <tr> <td>COD</td><td>-</td><td>452</td><td>526</td></tr> <tr> <td>Total Solid</td><td>-</td><td>4195</td><td>3522</td></tr> <tr> <td>S Solid</td><td>400</td><td>344</td><td>267</td></tr> <tr> <td>Oil & Grease</td><td>50</td><td>7</td><td>6</td></tr> <tr> <td>A Nitrogen</td><td>150</td><td>48</td><td>34</td></tr> <tr> <td>Total N</td><td>200</td><td>61</td><td>45</td></tr> </tbody> </table> <p>b) The results from final discharge were compliance within the DOE parameter limit. Bukit Sagu POM DOE license as for water course requirement of which is BOD less than 100 mg/l. The mill is currently compiling a 5 years master blueprint discussed on the entire Group basis having the following projects for enhancement to the environmental issues.</p>	Sample Date	Standard	22/07/2024	24/06/2024	pH	5-9	8.52	8.42	BOD	100	90	69	COD	-	452	526	Total Solid	-	4195	3522	S Solid	400	344	267	Oil & Grease	50	7	6	A Nitrogen	150	48	34	Total N	200	61	45	Complied
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Criterion 4.5.5: Natural water resources																																							
4.5.5.1	The management shall establish water management plans to maintain the quality and availability of natural water resources	<p>a) The mill has recorded the water consumption for the mill milling process. Summary of the records is as following: January – December 2023: 1.07 litres/mt FFB</p>	Complied																																				

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Criterion / Indicator	Assessment Findings	Compliance																		
<p>(surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>January – August 2024 (to-date): 1.33 litres/mt FFB</p> <p>b) BSPOM conducted river upstream and downstream quality monitoring through river water sampling analysis as per latest sampling analysis results as following:</p> <p>FGVPI Bukit Goh Analytical Lab Analysis certificate # 2437/2024; Sample receive date: 10/06/2024; Report date: 21/06/2024</p> <table border="1" data-bbox="1126 683 1865 847"> <thead> <tr> <th>Sample ref.</th><th>Sample description</th><th>Parameters test result</th></tr> </thead> <tbody> <tr> <td>5643/2024</td><td>Batu River Upstream Water</td><td>BOD: 8 mg/l</td></tr> <tr> <td>5644/2024</td><td>Reman River Downstream Water</td><td>BOD: 6 mg/l</td></tr> </tbody> </table> <p>Other parameters tested including COD, TS, SS, O&G, AN and KJELDAHL are within Raw Water NWQS</p> <p>Latest result as per records of FGVPI Bukit Goh Analytical Lab Analysis certificate # 3420/2024; Sample receive date: 19/08/2024; Report date: 26/08/2024</p> <table border="1" data-bbox="1126 1034 1865 1214"> <thead> <tr> <th>Sample ref.</th><th>Sample description</th><th>Parameters test result</th></tr> </thead> <tbody> <tr> <td>7937/2024</td><td>Batu River Upstream Water</td><td>BOD: 5 mg/l</td></tr> <tr> <td>7937/2024</td><td>Reman River Downstream Water</td><td>BOD: 3 mg/l</td></tr> </tbody> </table> <p>c) Water management plan in place and implemented by mill to ensure efficient use and continued availability of water source and to avoid negative impacts on other users in catchment. The plan includes the following:</p> <ol style="list-style-type: none"> 1. Rainwater harvesting for cleaning purposes 	Sample ref.	Sample description	Parameters test result	5643/2024	Batu River Upstream Water	BOD: 8 mg/l	5644/2024	Reman River Downstream Water	BOD: 6 mg/l	Sample ref.	Sample description	Parameters test result	7937/2024	Batu River Upstream Water	BOD: 5 mg/l	7937/2024	Reman River Downstream Water	BOD: 3 mg/l	
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7937/2024	Reman River Downstream Water	BOD: 3 mg/l																		

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Criterion / Indicator		Assessment Findings	Compliance
		2. Water from the reservoir/catchment for the mill operations 3. Continuous training for workers on water efficiency consumption 4. Desilting of water reservoir to retain the reservoir optimal capacity 5. The action plan in event of draught/water pollution 6. Monitoring of water and wastewater discharge quality	
4.5.5.2	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations. - Major compliance -	Details of effluent treatment and report as per item 4.5.4.3 above. The effluent are discharged on water course. The mill plans to reduce the effluent by reducing the water for the process.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Mill Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	The mill processing system is documented in several key documents, including: <ul style="list-style-type: none"> • The Mill Lestari Processing Manual • Mill Standard Operating Procedure (SOP) • The Mill Quality Management Manual • Prosedur Kerja Selamat Manual Kelestarian (Sustainability): <ul style="list-style-type: none"> • RSPO Supply Chain Manual • ESH Management System Manual • Occupational Safety and Health Manual 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Pictorial Safety Standards • Laboratory Process Control Manual • Security Guidelines <p>These documents provide guidelines and standards for mill operations. The SOPs detail processes including:</p> <ul style="list-style-type: none"> • Reception and sterilization • Threshing and pressing • Clarification and nut polishing • Effluent management • Laboratory processes • Workshop and dispatch procedures <p>These manuals are available in the administration office for reference by interested parties. Site inspections and interviews with workers confirm that the SOPs are implemented effectively and that employees understand their requirements.</p> <p>Additionally, industry and MPOB manuals, as well as technical guidelines from the Agricultural Reference Manual, are used for further guidance. These documents cover operational activities from:</p> <ul style="list-style-type: none"> • Seedlings in nursery to planting young palms • Plantation upkeep to mill FFB receipt, grading, and processing • Quality analysis and dispatch of CPO and PK • Security within the CU <p>The contents of these manuals are communicated to workers through:</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Morning musters • Weekly mill briefings • Ad hoc and programmed training sessions 	
4.6.1.2	<p>All palm oil mills shall implement best practices.</p> <p>- Major compliance -</p>	<p>The mill's process monitoring is managed through shift supervision, led by an Assistant Engineer. All process parameters are documented and summarized in a daily report.</p> <p>External monitoring includes:</p> <ul style="list-style-type: none"> • Visits by the RC/ZH and technical personnel from the Head Office • Annual UPV machinery inspections by DOSH • Audits by SCCD and ADK (Audit Dalam Kumpulan) <p>These measures ensure compliance with policies and procedures related to mill operations, finance, OSH (Occupational Safety and Health), and welfare.</p> <p>Monitoring mechanisms include:</p> <p>Daily:</p> <ul style="list-style-type: none"> • Supervision by staff/assistant/manager • Reporting of daily activities, costings, and variations <p>Scheduled:</p> <ul style="list-style-type: none"> • Quarterly ESH meetings • Internal audits by GCAD/SHO • External audits by RSPO/MSPO • Visits by Zone Head/Regional Controller <p>Annual:</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> Annual EPMC (Environmental, Health, and Safety Performance Monitoring) Medical surveillance <p>The mill maintains records of monitoring activities, which are available for review. Records span from field/mill supervisors to executives and managers. The Regional Controller (RC) is responsible for overseeing estate compliance with SOPs, budget, and productivity. Estate and mill performance are reviewed during monthly meetings with the RC/ZH.</p> <p>The production report was verified. These records, including daily production reports, monthly reports, regional meeting minutes, and SCCD internal audit reports, confirm that the monitoring system is effective and functional.</p>	
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p>	<p>Bukit Sagu POM has established 5 years business plan as guidance for the mill to conduct the daily operation and expenditure. The business plan was documented in 5 years production, expenditure, and profit/loss projection.</p> <p>Items stated in the business plan as follows:</p> <ul style="list-style-type: none"> FFB statement FFB Production and FFB purchase (FFB, CPO, PK, OER, KER) Production cost vs Cost/tons <p>Dispatch (CPO and PK) The capital expenditure was documented in Financial Year Proposed Capital Expenditure (CAPEX).</p>	Complied
Criterion 4.6.3: Transparent and fair price dealing			

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Criterion / Indicator		Assessment Findings	Compliance
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Pricing mechanism was clearly stated in the agreement. Payments are processed and paid by the mill. Seen the payment vouchers that have been made promptly. Sampled of the Surat Perintah Kerja (SPK) of contractors as below: i. CMZ Resources; <i>Bina rumah Pam Anaerobik A2</i> , dated: 07/08/2024. Contract valid from (07/08/2024 – 11/08/2024). Sighted Invoice No. 0610 dated 13/08/2024. Good Receipt No.: 5006566185 dated 13/08/2024 – within agreed timeframe (not later than sixty days after the acceptance of the contractor invoice). ii. Seruan Azam Enterprise; <i>Fabrikasi, nut cross cony ribbon</i> , dated: 11/06/2024. Contract valid from (11/06/2024 – 20/06/2024). Sighted Invoice No. F-07824 dated 19/06/2024. Good Receipt No.: 5006512560 dated 19/06/2024 – within agreed timeframe (not later than sixty days after the acceptance of the contractor invoice). iii. Buj Technology Enterprise Sdn Bhd; rubbish collection, dated: 30/06/2024. Contract valid from (July 2024 – September 2025). Sighted Invoice No. FB 2407/013 dated 01/08/2024. Good Receipt No.: 5006556973 dated 02/08/2024 – within agreed timeframe (not later than sixty days after the acceptance of the contractor invoice).	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	The contracts agreements have the details about the pricing and terms & conditions. Payment was made promptly by verified the payment vouchers and interviewed with the contractors. Sample of contract agreement for contractors as per sample in 4.6.3.1.	Complied
Criterion 4.6.4: Contractor			

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Criterion / Indicator		Assessment Findings	Compliance
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	Clauses for the contractor to adhere the MSPO and legal requirements are spelled out in the Contract Agreement. Among details in the letter were: a. "Telah Dimaklumkan oleh Pihak Pengurusan Ladang tentang Program Pensijilan MSPO/RSPO". b. "Memahami Keperluan yang terandung dalam Program Pensijilan MSPO/RSPO". c. "Sentiasa Mematuhi segala keperluan Pematuhan MSPO". d. "Membenarkan Auditor dari Badan Pensijilan menyemak dokumen berkaitan, memeriksa operasi dan menemuramah para petugas dan pekerja kontraktor". The mill management has also conducted the briefing of "Taklimat WRO, RSPO, MSPO kepada Kontraktor" on 05/01/2024. Sighted the training record, photos and attendance list is available as per audit	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	The management has provided the contract agreement to the contract. Interview during stakeholder consultation also confirmed that the management has provided them with contract agreement. Sample of contractor is such as follow: i. CXX RXXXXXXXXX; <i>Bina rumah Pam Anaerobik A2</i> , dated: 07/08/2024. Contract valid from (07/08/2024 – 11/08/2024). ii. SXXXXX AXXX EXXXXXXXXX; <i>Fabrikasi, nut cross cony ribbon</i> , dated: 11/06/2024. Contract valid from (11/06/2024 – 20/06/2024). iii. BXX TXXXXXXXXX EXXXXXXXX Sdn Bhd; <i>rubbish collection</i> , dated: 30/06/2024. Contract valid from (July 2024 – September 2025).	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	FGV Holdings Berhad has agreed for BSI auditors to verify the assessment through a physical inspection if required. This stated in the contract agreement between mill management and each	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		contractor. Clauses for the contractor to adhere the MSPO and legal requirements are spelled out in addendum to the Contract Agreement: "Membenarkan Auditor dari Badan Pensijilan menyemak dokumen berkaitan, memeriksa operasi dan menemuramah para petugas dan pekerja kontraktor".	

Appendix B: Smallholder Member Details

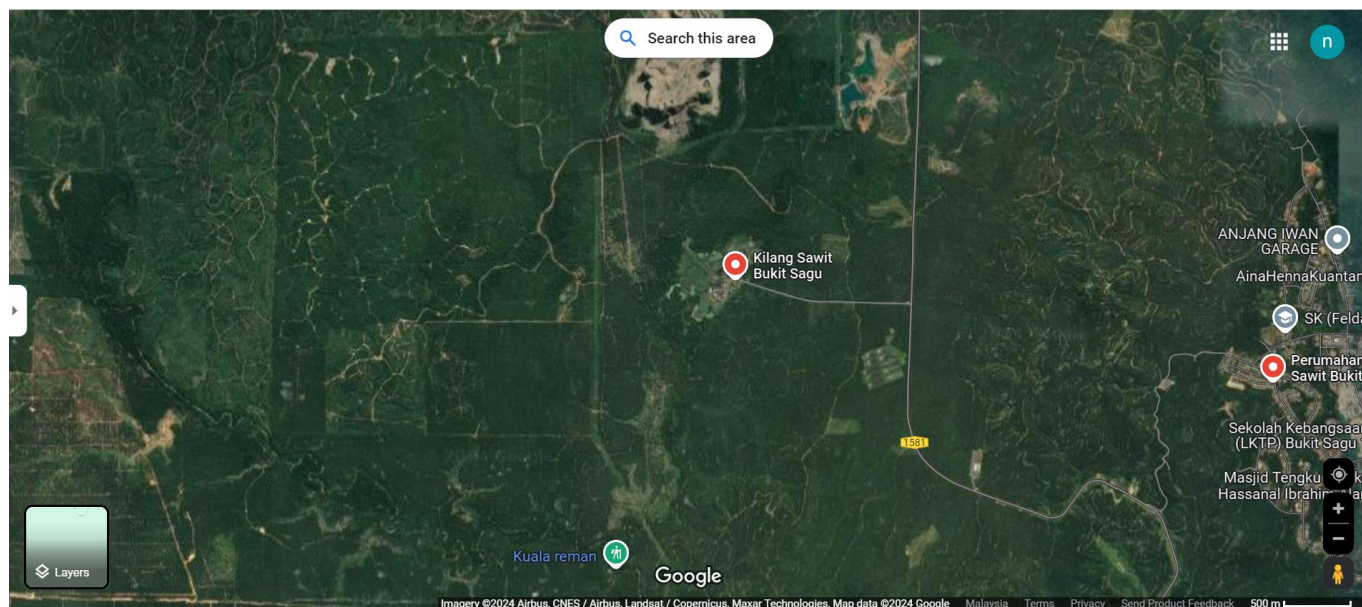
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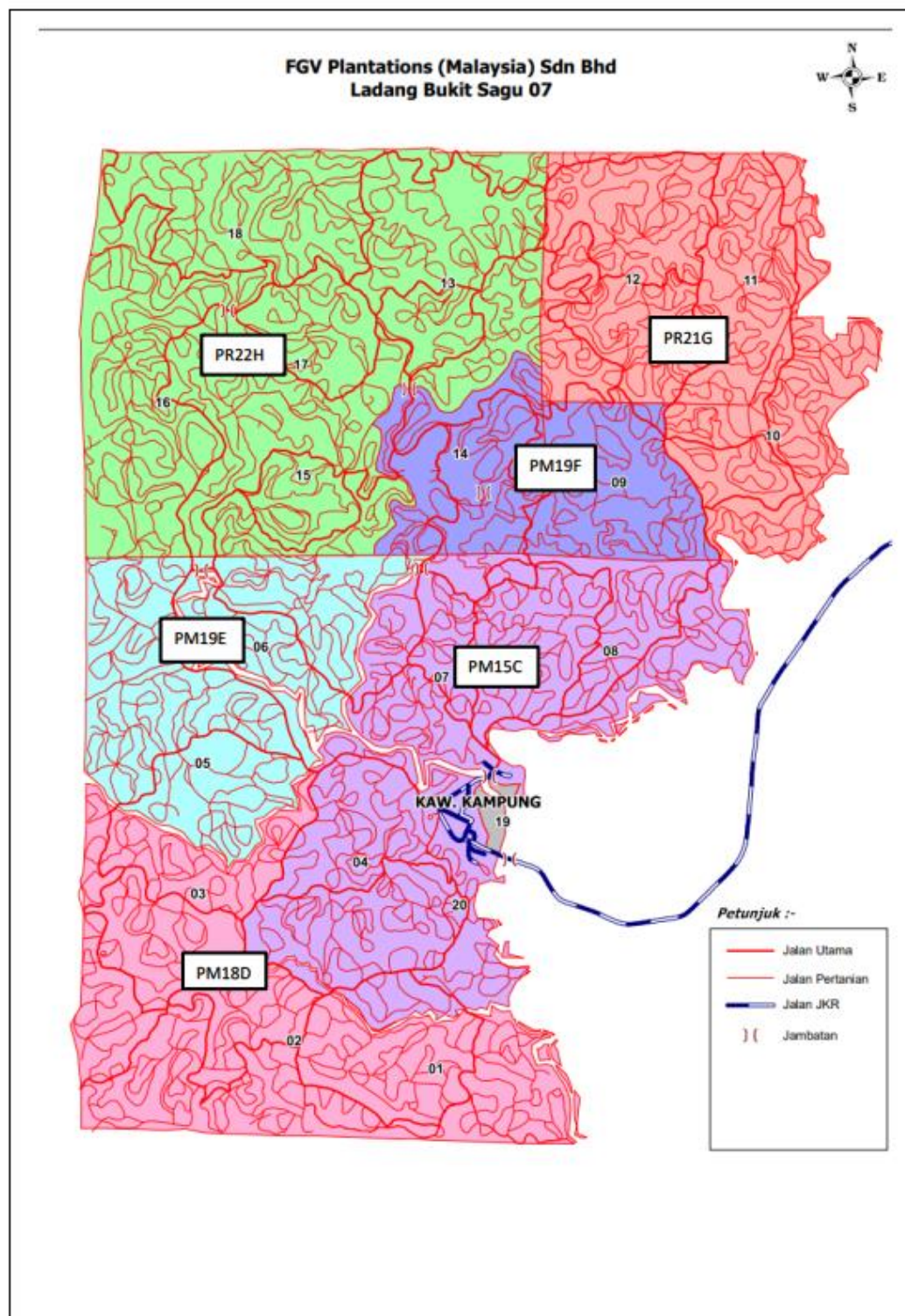
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Appendix C: Location and Field Map

Bukit Sagu POM

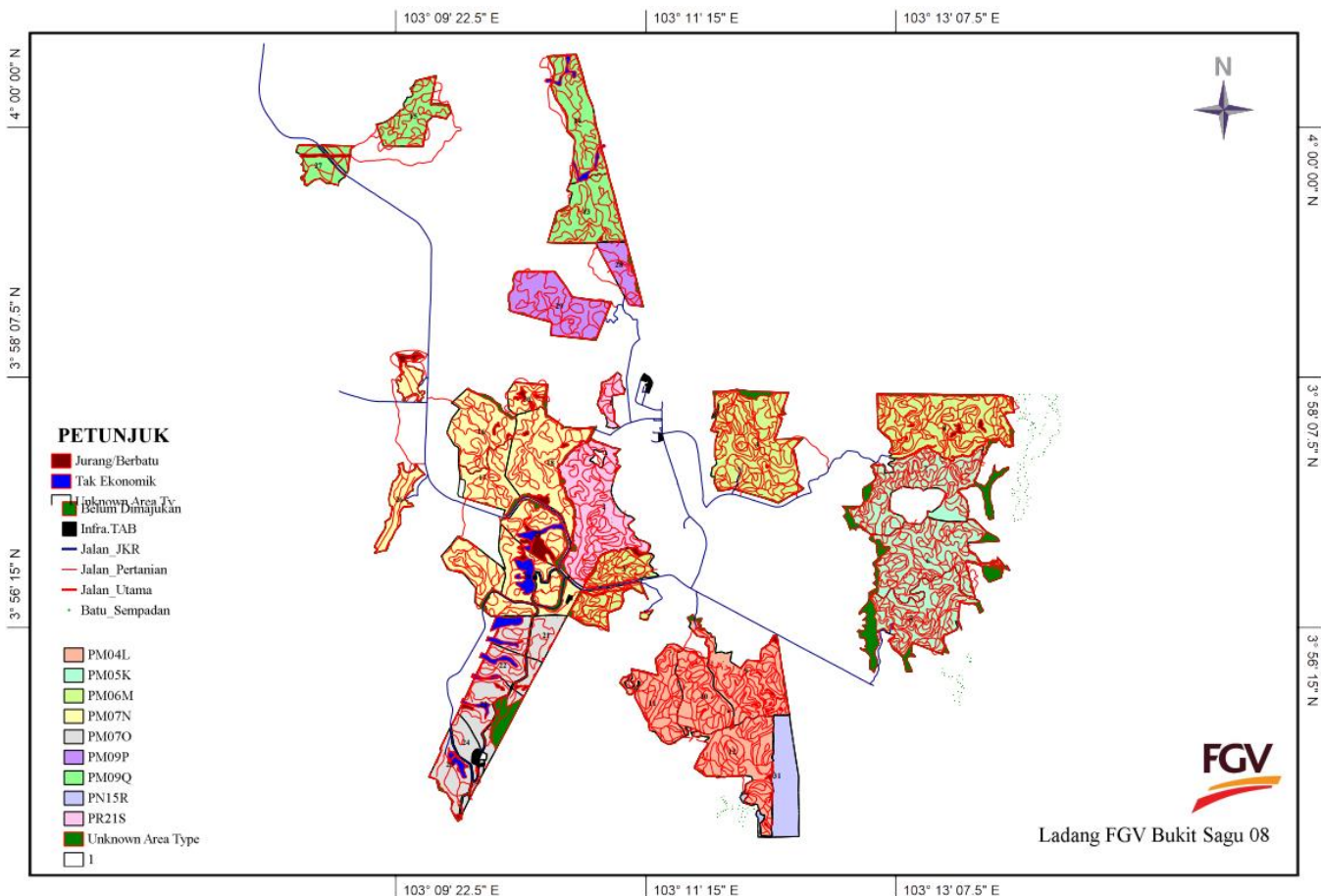


Bukit Sagu 07 Estate

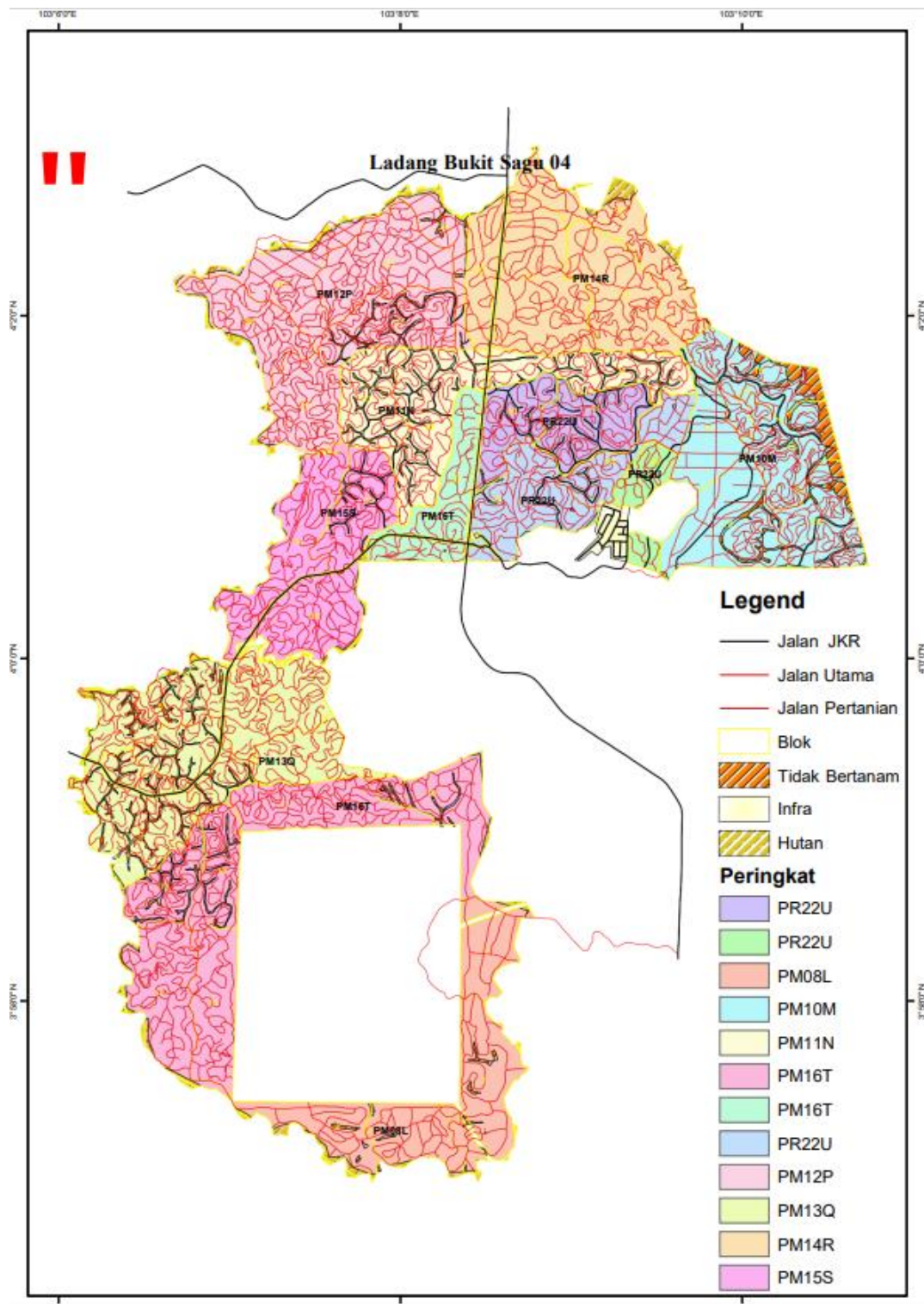


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Bukit Sagu 08 Estate

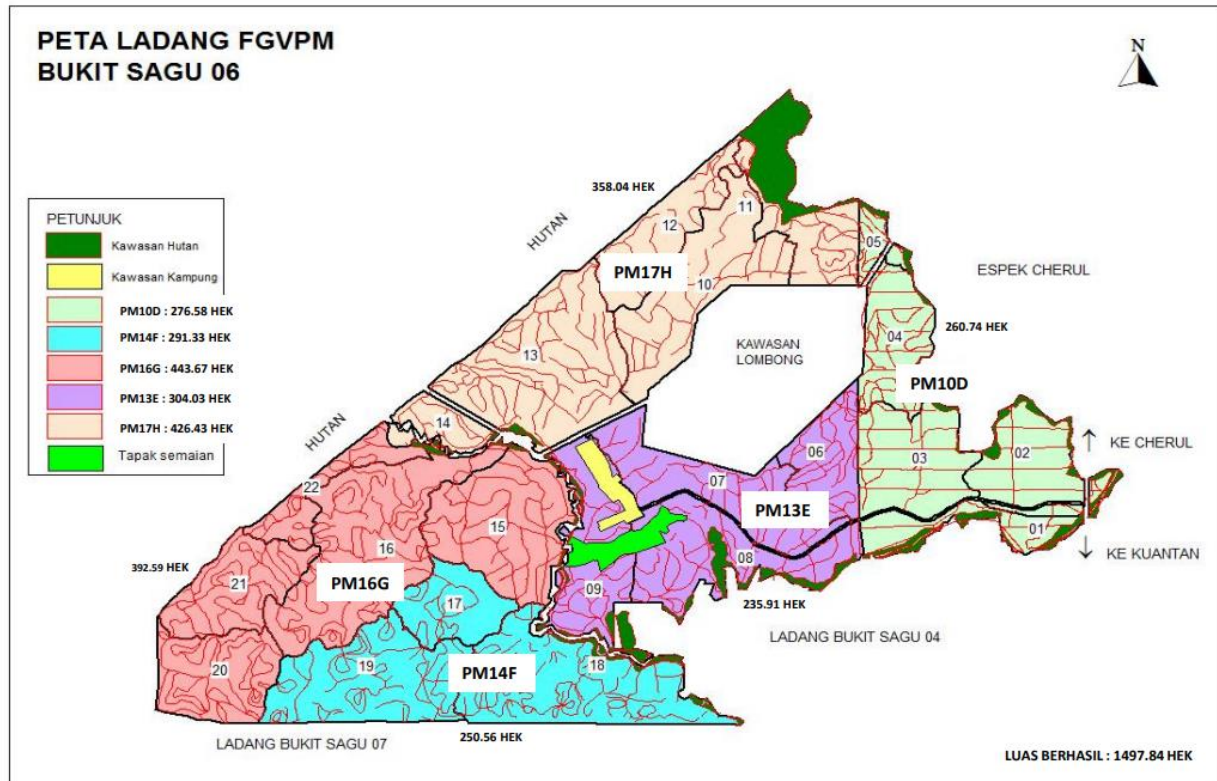


Bukit Sagu 04 Estate



Bukit Sagu 06 Estate

PETA LADANG (1766.44 HEK)



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BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MSPO	Malaysian Sustainable Palm Oil
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
RTE	Rare, Threatened or Endangered species
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure