

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- ☐ Initial Assessment
- ☒ Annual Surveillance Assessment (1_4)
- ☐ Recertification Assessment (Choose an item.)
- ☐ Extension of Scope

| |
|--|
| Client Company Name / Parent Company: GENTING PLANTATIONS BERHAD |
| Client Company / Parent Company Address: 10th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia |
| Certification Unit: Genting Oil Mill Sdn Bhd Genting Ayer Item Oil Mill |
| Location of Certification Unit: Batu 54, Jalan Johor, Air Hitam, 86100, Johor, Malaysia |
| Date of Final Report: 23/06/2024 |

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Section 1: Scope of the Assessment

| 1. Company Details | | | |
|---|---|--------------------------|--|
| Parent Company | Genting Plantations Berhad | | |
| RSPO Membership Number | 1-0086-06-000-00 | Membership Approval Date | 14/11/2006 |
| Address | 10th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia. | | |
| Palm Oil Mill / Group Manager / Estate (Certification Unit) | Genting Oil Mill Sdn Bhd Genting Ayer Item Oil Mill | | |
| Location / Address | Batu 54, Jalan Johor, Ayer Hitam 86100, Johor, Malaysia | | |
| Website | www.gentingplantations.com | | |
| Management Representative | En Abdul Rahim Wilson Abdullah | E-mail | rahim.abdullah@gentingplantations.com |
| Telephone | 03-2333 6401 | Facsimile | N/A |

| 2. Certification Information | | | |
|--|--|---|--|
| Certificate Number | RSPO 653474 | Certificate Start Date | 26/03/2020 |
| Date of First Certification | 26/03/2015 | Certificate Expiry Date | 25/03/2025 |
| Scope of Certification | Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK) | | |
| Visit Objectives | <ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. | | |
| Assessment Cycle | <input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_4) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension | | |
| Applicable Standards / Normative Reference | RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018 | | |
| Supply Chain Module | <input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance | Mill Capacity | 60mt / Hour |
| ISH certification Phase | <input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable | | |
| Is this a remote audit or on-site audit | <input checked="" type="checkbox"/> On-site audit (Option AI) | <input type="checkbox"/> On-site audit (Option AII) | <input type="checkbox"/> Remote audit (Option B) |

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3. Other Certifications

| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date |
|-----------------------------|---|--------------------------|-------------|
| MSPO 696629 | MS 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders | BSI Services (M) Sdn Bhd | 28/06/2028 |
| MSPO 682363 | MSPO MS 2530-4:2013 General Principles for Palm Oil Mills | | 28/06/2028 |
| MSPO 716638 | MSPO Supply Chain Certification Standard 2018 | | 23/10/2024 |
| EU-ISCC-Cert-DE119 60213390 | ISCC EU | ASG Cert GmbH | 31/10/2024 |

4. Location(s) of Mill & Supply Bases

| Name (Mill / Supply Base / Group Manager / Smallholders) | Location | GPS Coordinates | |
|---|--|-----------------|-------------------|
| | | Latitude | Longitude |
| Genting Ayer Item Oil Mill | Batu 54, Jalan Johor (Ayer Hitam – Spg Renggam), 86100 Ayer Hitam, Johor. | 1° 51' 24.20" N | 103° 12' 36.00" E |
| Genting Kulai Besar Estate | No. 1213-1215, Jalan Kasturi 36/45, Indahpura, 81000 Kulai, Johor. | 1° 36' 55.34" N | 103° 36' 39.54" E |
| Genting Sri Gading Estate | PO Box No. 510, Jalan Bt Pahat – Kluang KM 12, Sri Gading, 83009 Bt Pahat, Johor. | 1° 50' 21.49" N | 103° 01' 06.02" E |
| Genting Sungei Rayat Estate | PO Box No. 511, Jalan Sri Gading - Pt Yaani KM 5, Sri Gading, 83009 Bt Pahat, Johor. | 1° 54' 14.19" N | 103° 00' 38.40" E |
| Genting Tanah Merah Estate | PO Box No.68, Jalan Tangak – Segamat KM 3, 84907 Tangkak, Johor. | 2° 16' 53.94" N | 102° 33' 37.17" E |
| Genting Tebong Estate | Jalan Tebong – Batang Melaka KM 4, 76460 Tebong, Melaka. | 2° 27' 20.05" N | 102° 21' 38.44" E |

5. Description of Supply Base

| New Planting Development | <input checked="" type="checkbox"/> No | | | <input type="checkbox"/> Yes | | |
|----------------------------|--|----------|---|------------------------------|-----------------|--------------|
| Estate / Smallholders | Total Planted (Mature + Immature) (ha) | HCV (ha) | Additional Set Aside Area which are not part of HCV | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
| Genting Kulai Besar Estate | 2,024.10 | 10.64 | 24.42 | 607.29 | 2,666.45 | 75.9 |

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| | | | | | | |
|-----------------------------|------------------|---------------|--------------|-----------------|------------------|-------------|
| Genting Sri Gading Estate | 3,219.18 | 25.82 | 4.11 | 280.09 | 3,529.20 | 91.2 |
| Genting Sungei Rayat Estate | 2,300.78 | 0.18 | 0 | 79.48 | 2,380.44 | 96.7 |
| Genting Tanah Merah Estate | 2,034.63 | 45.46 | 1.14 | 160.82 | 2,242.05 | 89.8 |
| Genting Tebong Estate | 2,845.51 | 34.31 | 10.98 | 125.13 | 3,015.93 | 94.3 |
| Total | 12,424.20 | 116.41 | 40.65 | 1,252.81 | 13,834.07 | 89.8 |

Note: 40.65ha which are the conservation/additional set aside area and not part of HCV, were declared as HCV previously. But the correct HCV area 116.41ha was declared in the RSPO metrics correctly since 2021.

| Estate | 2023 | | 2024 | | Reason |
|-----------------------------|------------------|------------------|------------------|------------------|--|
| | Planted | Total Area | Planted | Total Area | |
| Genting Kulai Besar Estate | 2,027.37 | 2,842.05 | 2,024.10 | 2,666.45 | Planted & Total reduced due to acquisition. |
| Genting Sri Gading Estate | 3,309.73 | 3,688.34 | 3,219.18 | 3,529.20 | Planted & Total reduced due to acquisition. |
| Genting Sungei Rayat Estate | 2,300.78 | 2,378.98 | 2,300.78 | 2,380.44 | Total area adjusted (increased) 1.46ha to match with land title. Planting ha remain same. |
| Genting Tanah Merah Estate | 2,044.96 | 2,242.05 | 2,034.63 | 2,242.05 | Planted reduced 10.33 ha due to conversion to Maize. |
| Genting Tebong Estate | 2,872.40 | 3,009.73 | 2,845.51 | 3,015.93 | Planted reduced 26.89 ha due to conversion to Maize. Total area adjusted (increased) 6.20ha due to GPS adjustment. |
| TOTAL | 12,555.24 | 14,161.15 | 12,424.20 | 13,834.07 | Planted reduced 131.04ha; Total area reduced 327.08ha. |

6. Plantings & Cycle

| Estate / Smallholders | Age (Years) - ha | | | | Mature | Immature |
|-----------------------------|------------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| | 0 - 3 | 4 - 14 | 15 - 25 | >25 | | |
| Genting Kulai Besar Estate | 585.22 | 812.67 | 383.90 | 242.31 | 1,438.88 | 585.22 |
| Genting Sri Gading Estate | 756.17 | 1446.12 | 847.92 | 168.97 | 2,463.01 | 756.17 |
| Genting Sungei Rayat Estate | 302.73 | 652.79 | 1252.72 | 92.54 | 1,998.05 | 302.73 |
| Genting Tanah Merah Estate | 547.08 | 696.09 | 684.49 | 106.97 | 1,487.55 | 547.08 |
| Genting Tebong Estate | 827.24 | 884.29 | 715.35 | 418.63 | 2,018.27 | 827.24 |
| Total (ha) | 3,018.44 | 4,491.96 | 3,884.38 | 1,029.42 | 9,405.76 | 3,018.44 |

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Note: Only Mature area is considered as production area

7. Summary of Certified Tonnage of FFB (Own Certified Scope)

| Estate / Smallholders | Tonnage (MT) / year | | | |
|-----------------------------|--|--|---|-----------------------------------|
| | Estimated last year (Mar 2023 – Feb 2024) | Actual (Feb 2023 – Jan 2024) | | Forecast (Mar 2024 – Feb 2025) |
| | | Previous license period (Feb 2023) | Current license period (Mar 2023 – Jan 2024) | |
| Genting Kulai Besar Estate | 38,352.00 | 2,126.61 | 30,533.93 | 38,139.00 |
| Genting Sri Gading Estate | 61,400.00 | 2,845.50 | 49,393.58 | 59,852.00 |
| Genting Sungei Rayat Estate | 54,810.00 | 2,797.35 | 38,840.10 | 48,530.00 |
| Genting Tanah Merah Estate | 29,961.00 | 1,652.45 | 23,681.00 | 35,048.00 |
| Genting Tebong Estate | 51,912.00 | 3,052.65 | 35,333.12 | 41,718.00 |
| Total | 236,435.00 | 190,256.29 | | 223,287.00 |

8. Summary of Certified Tonnage of FFB (from other certified unit(s))

| Estate / Smallholders | Tonnage (MT) / year | | | |
|-----------------------|--|--|---|-----------------------------------|
| | Estimated last year (Mar 2023 – Feb 2024) | Actual (Feb 2023 – Jan 2024) | | Forecast (Mar 2024 – Feb 2025) |
| | | Previous license period (Feb 2023) | Current license period (Mar 2023 – Jan 2024) | |
| N/A | N/A | N/A | N/A | |
| Total | | N/A | | |

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)

| Out growers / smallholders | Tonnage (MT) / year | | | |
|----------------------------|--|--|---|-----------------------------------|
| | Estimated last year (Mar 2023 – Feb 2024) | Actual (Feb 2023 – Jan 2024) | | Forecast (Mar 2024 – Feb 2025) |
| | | Previous license period (Feb 2023) | Current license period (Mar 2023 – Jan 2024) | |
| N/A | N/A | N/A | N/A | N/A |
| Total | N/A | N/A | | N/A |

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| 9A. Monthly Records of Certified and Uncertified FFB Received since the last audit | | | | |
|--|--------------|---|---|----------------------|
| No. | Month - Year | Volume of FFB from certified supply base (mt) | Volume of FFB from uncertified supply base (mt) | Total FFB/Month (mt) |
| 1 | Feb 2023 | 12,474.56 | 0 | 12,474.56 |
| 2 | Mar 2023 | 12,148.96 | 0 | 12,148.96 |
| 3 | Apr 2023 | 12,239.15 | 0 | 12,239.15 |
| 4 | May 2023 | 16,081.66 | 0 | 16,081.66 |
| 5 | June 2023 | 12,377.57 | 0 | 12,377.57 |
| 6 | July 2023 | 20,212.10 | 0 | 20,212.10 |
| 7 | Aug 2023 | 20,461.88 | 0 | 20,461.88 |
| 8 | Sept 2023 | 19,991.42 | 0 | 19,991.42 |
| 9 | Oct 2023 | 16,234.21 | 0 | 16,234.21 |
| 10 | Nov 2023 | 17,089.52 | 0 | 17,089.52 |
| 11 | Dec 2023 | 17,128.21 | 0 | 17,128.21 |
| 12 | Jan 2024 | 13,817.05 | 0 | 13,817.05 |
| TOTAL | | 190,256.29 | 0 | 190,256.29 |

| 10. Summary of Certified Tonnage (MT) (not applicable for ISS) | | | |
|--|---------------------------------------|---|-----------------------------------|
| Estimated last year (Mac 2023 – Feb 2024) | Actual (Feb 2023 – Jan 2024) | | Forecast (Mac 2024 – Feb 2025) |
| | Previous license period (Feb 2023) | Current license period (Mac 2023 – Jan 2024) | |
| FFB | FFB | | FFB |
| 236,435.00 mt | 12,474.56 mt | 177,781.73 mt | 223,287 mt |
| | TOTAL | 190,256.29 mt | |
| CPO (OER: 20.41%) | CPO (OER: 20.47%) | | CPO (OER: 20.56 %) |
| 48,256.00 mt | 2,461.80 mt | 36,486.93 mt | 45,907.81 mt |
| | TOTAL | 38,948.74 mt | |
| PK (KER: 5.25 %) | PK (KER: 5.16 %) | | PK (KER: 5.11 %) |
| 12,413.00 mt | 652.78 mt | 9,156.06 mt | 11,409.97 mt |
| | TOTAL | 9,808.84 mt | |

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| 10A. Monthly Records of Certified CPO & PK since the last audit | | | |
|---|--------------|--------------------|-------------------|
| No. | Month - Year | Certified CPO (MT) | Certified PK (MT) |
| 1 | Feb 2023 | 2,461.80 | 652.78 |
| 2 | Mar 2023 | 2,410.63 | 654.00 |
| 3 | Apr 2023 | 2,487.05 | 631.89 |
| 4 | May 2023 | 3,392.28 | 818.30 |
| 5 | June 2023 | 2,496.15 | 601.75 |
| 6 | July 2023 | 4,152.57 | 1,023.70 |
| 7 | Aug 2023 | 4,181.53 | 1,038.73 |
| 8 | Sept 2023 | 4,246.54 | 1,043.77 |
| 9 | Oct 2023 | 3,374.27 | 842.12 |
| 10 | Nov 2023 | 3,582.34 | 952.31 |
| 11 | Dec 2023 | 3,480.56 | 891.00 |
| 12 | Jan 2024 | 2,683.01 | 658.49 |
| TOTAL | | 38,948.74 | 9,808.85 |

| 11. Summary of Actual Volume sold | | | | | |
|---|----------------|-------------------------|--------|--------------|-----------|
| Current License period (Mar 2023 – Jan 2024) | | | | | |
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | Others | | |
| CPO (MT) | 34,495.84 | 0 | 0 | 0 | 34,495.84 |
| PK (MT) | 8,703.44 | 0 | 0 | 0 | 8,703.44 |
| Credits | 0 | 0 | 0 | 0 | 0 |
| Previous License period (Feb 2023) | | | | | |
| CPO (MT) | 2,853.64 | 0 | 0 | 0 | 2,853.64 |
| PK (MT) | 846.56 | 0 | 0 | 0 | 846.56 |
| Credits | 0 | 0 | 0 | 0 | 0 |
| Note: Carry forward volume from January 2023: CPO=713.301 mt, PK: 447.212 mt | | | | | |

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| 11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any) | | | | |
|---|-------------|----------------------------------|-------------------------|------------------------|
| No. | Buyers Name | PalmTrace Trading License Number | Certified CPO Sold (MT) | Certified PK Sold (MT) |
| 1 | A | RSPO_PO100000003X | 5,499.08 | - |
| 2 | B | RSPO_PO10000001XX | 6,000.04 | - |
| 3 | C | RSPO_PO10000007XX | 1,000.10 | - |
| 4 | D | RSPO_PO1000000X7X | 496.64 | - |
| 5 | E | RSPO_PO10000001XX | 20,353.62 | - |
| 6 | F | RSPO_PO1000000X5X | 4,000.00 | - |
| 7 | G | RSPO_PO1000007X2X | | 7,200.00 |
| 8 | H | RSPO_PO10000070XX | | 2,350.00 |
| TOTAL | | | 37,349.48 | 9,550.00 |

| 11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any) | | | | |
|---|-------------|-------------|-------------------------|------------------------|
| No. | Buyers Name | Scheme Name | Certified CPO Sold (MT) | Certified PK Sold (MT) |
| 1 | N/A | N/A | N/A | N/A |
| TOTAL | | | N/A | N/A |

| 11C. Records of CPO & PK Sold as conventional since the last audit (if any) | | | |
|---|-------------|---------------|--------------|
| No. | Buyers Name | CPO Sold (MT) | PK Sold (MT) |
| 1 | N/A | N/A | N/A |
| TOTAL | | N/A | N/A |

| 11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any) | | | |
|---|-------------|----------------------------------|------------------------------------|
| No. | Buyers Name | PalmTrace Trading License Number | RSPO Credits of Certified CPO Sold |
| 1 | N/A | N/A | N/A |
| TOTAL | | | N/A |

| 12. Independent Smallholders Certified Tonnage (MT) / Volume | | | |
|--|---|----------------------------|------------------------------|
| | Estimated last year (Not Applicable) | Actual (Not Applicable) | Forecast (Not Applicable) |

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| Phase | Eligibility | MS A | MS B | Eligibility | MS A | MS B | Eligibility | MS A | MS B |
|----------|-------------|------|------|-------------|------|------|-------------|------|------|
| | 40% | 70% | 100% | 40% | 70% | 100% | 40% | 70% | 100% |
| FFB | | | N/A | | | N/A | | | N/A |
| IS-CSPO | N/A | N/A | | N/A | N/A | | N/A | N/A | |
| IS-CSPKO | N/A | N/A | | N/A | N/A | | N/A | N/A | |
| IS-CSPKE | N/A | N/A | | N/A | N/A | | N/A | N/A | |
| CSPK | N/A | N/A | | N/A | N/A | | N/A | N/A | |

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit

| No. | Month - Year | FFB (MT) | Certified CPO (MT) | Certified PK (MT) | Certified PKO (MT) | Certified PKE (MT) |
|--------------|--------------|------------|--------------------|-------------------|--------------------|--------------------|
| 1 | N/A | N/A | N/A | N/A | N/A | N/A |
| TOTAL | | N/A | N/A | N/A | N/A | N/A |

Note: 1 mt = 1 credit

13. Independent Smallholders Actual Sold Tonnage / Volume

| | FFB | FFB Conventional | FFB Other schemes | IS-CSPO | CSPK | IS-CSPKO | IS-CSPKE |
|---|-----|------------------|-------------------|---------|------|----------|----------|
| Current License period (Not applicable) | | | | | | | |
| Credits | | | | N/A | N/A | N/A | N/A |
| Physical | N/A | N/A | N/A | | | | |
| Previous License period (Not applicable) | | | | | | | |
| Credits | | | | N/A | N/A | N/A | N/A |
| Physical | N/A | N/A | N/A | | | | |

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit

| No. | Buyers Name | PalmTrace Trading License Number | FFB Sold (MT) | Certified CPO Sold (MT/credit) | Certified PK Sold (MT/credit) | Certified PKO Sold (MT/credit) | Certified PKE Sold (MT/credit) |
|--------------|-------------|----------------------------------|---------------|--------------------------------|-------------------------------|--------------------------------|--------------------------------|
| 1 | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| TOTAL | | | N/A | N/A | N/A | N/A | N/A |

Section 2: Assessment Process

Certification Body:

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

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 is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **19/02/2024 – 23/02/2024**. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The Critical NC close out on-site assessment was conducted on **03/05/2024**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

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

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

| Assessment Program | | | | | |
|------------------------------|------------------------------|--------------------|--------------------|--------------------|--------------------|
| Name (Mill / Supply Base) | Year 1 (Re-Certification) | Year 2 (ASA1-1) | Year 3 (ASA1-2) | Year 4 (ASA1-3) | Year 5 (ASA1-4) |
| Genting Ayer Item Oil Mill | ✓ | ✓ | ✓ | ✓ | ✓ |
| Genting Kulai Besar Estate | - | ✓ | ✓ | ✓ | ✓ |
| Genting Sri Gading Estate | ✓ | - | ✓ | ✓ | ✓ |
| Genting Sungei Rayat Estate | - | ✓ | ✓ | - | ✓ |
| Genting Tanah Merah Estate | ✓ | - | ✓ | ✓ | - |
| Genting Tebong Estate | ✓ | ✓ | ✓ | ✓ | ✓ |

Tentative Date of Next Visit: February 19, 2025 - February 23, 2025

Total Number of Mandays: 15 Mandays

2.2 BSI Assessment Team

| Name | Role | Competency |
|---------------------------------------|-------------|--|
| Mohamed Zainal (MHZ) Hidhir Abidin | Team Leader | <p>Education: Bachelor Degree in Chemical Engineering, National University of Malaysia, 2006</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1) 7 years working experience in palm oil industry specifically on palm oil milling for 5 years 2) Auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO since 2012 <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 9001 Lead Auditor Course 2) ISO 14001 Lead Auditor Course 3) OHSAS 18001 Lead Auditor Course in 2012 4) Endorsed RSPO P&C Lead Auditor Course in 2013 5) MSPO Awareness Training in 2014 6) Endorsed RSPO SCCS Lead Auditor Course |

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| | | |
|------------------------------|-------------|--|
| | | <p>7) SMETA Auditor training</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p> |
| Fahmi Othman | Team Member | <p>Education: Bachelor's Degree in Industrial Biology from Universiti Teknologi Malaysia, graduated in 2010.</p> <p>Work Experience: He gained his working exposure in the plantation sector, serving as an Assistant Manager with FGV Plantation (M) Sdn Bhd managing the day-to-day plantation operations before joining FGV Holdings Berhad as Sustainability Officer for another significant numbers of years. In his career at FGV, Fahmi had accumulated more than 7 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans</p> <p>Training attended: He has completed CQI – IRCA approved ISO 9001, and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course as well as SA 8000.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p> |
| Yusof Khairan Nizar (YKN) | Team Member | <p>Education: Holds a Diploma in Public Administration-ITM (1991), Certificate of Safety and Health Officer-MII (2003), Bachelor of Corporate Administration (Hons), MARA University of Technology and a Master of Science in Occupational Safety and Health Management-Northern University of Malaysia.</p> <p>Work Experience: Has more than 30 years of working experience in varies industries including as safety officer in manufacturing company; consultant and trainer for management systems including ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, OHSAS 18001:2007, MS1722:2011, Environmental Legislation; contract auditor with varies accredited certification bodies for scheme including Malaysia Sustainable Palm Oil (MSPO), RSPO Principles & Criteria; MPOCC Registered Peer Reviewer and was a Certificate of Safety and Health Officer-Malaysian Insurance Institute.</p> <p>Training attended: He has completed ISO 9001:2000 IRCA/IATC A Lead Auditor Training; ISO 14001:2004 IEMA Approved EMS Advanced Lead</p> |

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| | | <p>Auditor Training Course; OH&SMS IRCA Certified Lead Auditor Training Course; MS 1722 Lead Auditor Training; MSPO Auditing; Endorsed RSPO P&C 2018 Lead Auditor Course; SMETA Requirements Training; HCV & HCS Introductory Training, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&C).</p> <p>. Also attended the Quality & Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment – For Bodies Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality Malaysia, ISO/IEC 17021. MSPO Peer Reviewer Training (MPOCC).</p> <p>Language Proficiency: Fluent in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p> |
|--|--|--|

Accompanying Persons:

| Name | Role |
|------|------|
| N/A | N/A |

2.3 Assessment Plan

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

| Date | Time | Subjects | MHZA | YKN | FBO |
|---|--------------|--|------|-----|-----|
| Sunday 18/02/2024 | PM | Audit team travel to Kulai. Check in at Corsica Hotel, Kulai | √ | √ | √ |
| Monday 19/02/2024 Genting Kulai Besar Estate | 0730 | Audit team travel to Genting Kulai Besar Estate. | √ | √ | √ |
| | 0830 | Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). Verification on previous audit findings | | | |
| | 0900 1300 | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc. | √ | √ | √ |
| | 1000 1230 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | - | - | √ |
| | 1230 1330 | Lunch break | √ | √ | √ |

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|---|--------------|---|---|---|---|
| | 1330 1630 | Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc). | √ | √ | √ |
| | 1630 1700 | Interim Closing Briefing | √ | √ | √ |
| Tuesday 20/02/2024 Genting Ayer Item Oil Mill | 0730 | Audit team travel to Ayer Hitam | √ | √ | √ |
| | 0830 1230 | Genting Ayer Item Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area. | √ | √ | √ |
| | | RSPO Supply chain requirements for mill - Identity Preserved Model - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities - Record keeping - Extraction Rate - Processing | √ | - | - |
| | | - Registration of transaction - Claims | | | |
| | 1000 1230 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | - | - | √ |
| | 1230 1330 | Lunch | √ | √ | √ |
| | 1330 1630 | Document Review P1 – P7: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc | √ | √ | √ |
| | 1630 1700 | Interim Closing Briefing | √ | √ | √ |
| Wednesday 21/02/2024 Genting Sungei Rayat Estate | 0730 | Audit team travel to Genting Sungei Rayat Estate | √ | √ | √ |
| | 0830 1230 | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc. | | | |
| | 1000 1230 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | - | √ | - |
| | 1230 1330 | Lunch break | √ | √ | √ |

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|--|--------------|--|---|---|---|
| | 1330 1630 | Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc). | ✓ | ✓ | ✓ |
| | 1630 1700 | Interim Closing Briefing | ✓ | ✓ | ✓ |
| Thursday 22/02/2024 Genting Sri Gading Estate | 0730 | Audit team travel to Genting Sri Gading Estate | ✓ | ✓ | ✓ |
| | 0830 1230 | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc. | | | |
| | 1230 1330 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | ✓ | ✓ | ✓ |
| | 1330 1430 | Lunch break | ✓ | ✓ | ✓ |
| | 1330 1630 | Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc). | ✓ | ✓ | ✓ |
| | 1630 1700 | Interim Closing Briefing. Audit team travel to Tampin | ✓ | ✓ | ✓ |
| Thursday 23/02/2024 | 0730 | Audit team travel to Genting Tebong Estate | ✓ | ✓ | ✓ |

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|----------------------------------|--------------|--|---|---|---|
| Genting Tebong Estate | 0830 1230 | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc. | | | |
| | 1230 1330 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | √ | √ | √ |
| | 1330 1530 | Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc). | √ | √ | √ |
| | 1530 1600 | Audit team discussion | √ | √ | √ |
| | 1600 | Closing meeting. Conclusion and recommendation | √ | √ | √ |

Major NC Close Out assessment

| PRELIMINARY AGENDA | | |
|-----------------------|---|-------------|
| Time | Subjects | Mohd Hidhir |
| Thursday 2/05/2024 | Audit team travel to Batu Pahat | √ |
| Friday 3/05/2024 | | |
| 0730 | Audit team travel to Genting Sg Rayat Estate | √ |
| 0830 – 0900 | Opening Meeting <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Briefing on the verification plan | |

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| PRELIMINARY AGENDA | | |
|--------------------|--|-------------|
| Time | Subjects | Mohd Hidhir |
| 0900 – 1000 | Major NC verification <ul style="list-style-type: none"> 2460392-202402-M1 – Document review and management/worker's interview | √ |
| 1000 – 1030 | Auditor travel to Genting Ayer Item Oil Mill | |
| 1030 – 1230 | <ul style="list-style-type: none"> 2460392-202402-M2 – Document review and management/worker's interview 2460392-202402-M3 – Document review, site observation and management/worker's interview | |
| 1230 - 1300 | Continue with unfinished elements. Closing meeting - conclusion and recommendation | √ |
| 1300 | End of audit | √ |

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Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

| Requirement | Assessment | Compliance |
|--|---|------------|
| Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company? | Yes | Complied |
| Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021 | No. The delays are due to the following factors: 1. Some estates in Indonesia are in progress to obtain their Hak Guna Usaha (HGU). 2. PT SP, KMJ, DWK is in the process of obtaining Forest Release and Forest Exchange prior to HGU application. 3. PT SISM is in the process of NPP and obtaining HGU. 4. PT SMA's NPP & HCSA Report Completed. In process of obtaining HGU. 5. PT CSC is in the process of obtaining HGU. HCSA report completed review. 6. NPP in progress for PT KIU. PT GAL is the latest unit certified at Indonesia. Certificate attached. | Complied |
| Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021. | No new acquisitions as of Feb 2024. | Complied |
| Any deviations from the maximum periods requires approval by the RSPO Secretariat. | Yes, there are some deviations at Indonesia units. Approval had been obtained from RSPO. Refer attached email approval from RSPO dated 18/11/2023. | Complied |
| Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting? | No changes in the 100% certification targets, except for adjustment of months & years for the planned certification. Refer attached email approval from RSPO dated 18/11/2023. Yes. | Complied |

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| | | |
|---|---|----------|
| Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised | Yes, but based on latest approved TBP, a new time plan was proposed & approved on 18/11/2023. | Complied |
| Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised | No. | Complied |
| Un-Certified Units or Holdings | | |
| No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12. | NPP documents are publicly available at the RSPO website. Registered HCSA reports Completed Peer Review Reports are published at: https://highcarbonstock.org/registered-hcsa-and-hcv-hcsa-assessments/ | Complied |
| Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure. | Completed Peer Reviewed HCV reports: PT Sawit Mitra Abadi: https://hcvnetwork.org/reports/hcv-assessment-in-permit-of-additional-area-1-000-ha-pt-sawit-mitra-abadi-ketapang-regency-west-kalimantan-province/ PT United Agro Indonesia: https://hcvnetwork.org/reports/high-conservation-value-assessment-hcv-in-the-permit-area-pt-united-agro-indonesia/ PT Agro Abadi Cemerlang: https://hcvnetwork.org/reports/final-report-of-high-conservation-value-assessment-in-the-concession-area-of-pt-agro-abadi-cemerlang-sanggau-regency-west-kalimantan-province/ PT Kharisma Inti Usaha (KIU): https://hcvnetwork.org/reports/high-conservation-value-identification-pt-kharisma-inti-usaha/ NPPs in progress: PT Sepanjang Intisurya Mulia https://hcvnetwork.org/reports/laporan-hcv-hcs-integrasi-di-areal-izin-penambahan-luasan-pt-sepanjang-intisurya-muliakabupaten-ketapang-provinsi-kalimantan-barat/ | Complied |
| Any Land conflicts are being resolved through a | No outstanding land conflicts. | Complied |

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| | | |
|---|---|----------|
| mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8. | <u>Indonesian Operating Units</u> SOP - CPD – 02-00.00 Mekanisme Penyelesaian Sengketa Lahan <u>Malaysian Operating Unit</u> SMP-GPB-18 Negotiation, Compensation and Handling Procedures | |
| Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2 | No outstanding labour disputes. Should there be any, the following procedures applied: <u>Indonesian Operating Unit</u> SOP - HRD-04-00.00 - Penyelesaian Keluh Kesah <u>Malaysian Operating Unit</u> SMP-GPB-19 Complaints and Grievances | Complied |
| Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1 | No. | Complied |
| Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified. | Yes, Sustainability Dept conducts the Internal Audit. Positive Assurance Statement for 2024 (attached) | Complied |
| Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO? | No. | Complied |
| Have there been any stakeholder (including NGO) consultation conducted? | Yes. | Complied |

3.2 Progress of scheme smallholders and/or outgrowers

| Progress of scheme smallholders or outgrowers towards compliance with relevant standards | | |
|--|--|----------------|
| Requirement | Remarks | Compliance |
| Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years. | Not Applicable, as no scheme smallholders and/or scheme out-growers supplying to the mill. | Not Applicable |

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Approved Time Bound Plan

| No | Subsidiaries & Ownership (%) | Name of the Estate and Mills | | TBP for certification | Status as of November 2022 | Any unresolved non-compliances |
|----|--|--|---|-----------------------|----------------------------|--------------------------------|
| 1 | Genting Plantations (WM) Sdn Bhd & Setiamas Sdn Bhd (100%) for estates Genting Oil Mill Sdn Bhd (100%) for mill | Genting Sri Gading Estate | Supply base for Genting Ayer Item Oil Mill, Johor, Malaysia | Dec, 2014 | Certified | None |
| 2 | | Genting Sungei Rayat Estate | | | | |
| 3 | | Genting Kulai Besar Estate | | | | |
| 4 | | Genting Tanah Merah Estate | | Dec, 2015 | | |
| 5 | | Genting Tebong Estate | | July, 2015 | | |
| 6 | Genting Plantations (WM) Sdn Bhd (100%) for estate | Genting Selama Estate, Kedah, Malaysia | | July 2019 | Certified | None |
| 7 | Genting Oil Mills (Sabah) Sdn Bhd (100%) for Mill Genting Plantations Berhad (Estate) | Genting Sabapalm Estate, Sabah, Malaysia | Supply base for Genting Sabapalm Oil Mill, Sabah, Malaysia | Aug, 2015 | Certified | None |
| 8 | Genting Tanjung Bahagia Sdn Bhd (100%) for estates Genting Oil Mills (Sabah) Sdn Bhd (Mill) | Genting Tanjung Estate, Sabah, Malaysia | Supply base for Genting Tanjung Oil Mill, Sabah, Malaysia | Aug, 2016 | Certified | None |
| 9 | | Genting Tenegang Estate, Sabah, Malaysia | | | | |
| 10 | | Genting Layang Estate, Sabah, Malaysia | | | | |
| 11 | | Genting Bahagia Estate, | | | | |
| 12 | Landworthy Sdn Bhd (84%) | Genting Landworthy Estate, Sabah, Malaysia | | | | |

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| No | Subsidiaries & Ownership (%) | Name of the Estate and Mills | | TBP for certification | Status as of November 2022 | Any unresolved non-compliances |
|----|--|--|---|-----------------------|----------------------------|--|
| 13 | Genting Tanjung Bahagia Sdn Bhd (100%) for estates | Genting Indah Estate, Sabah, Malaysia | Supply base for Genting Indah Oil Mill, Sabah, Malaysia | July, 2022 | Certified on 19/09/2022 | None. RSPO Remediation and Compensation Plan (RaCP)[RaCP 2076] for Genting Tanjung Bahagia Sdn. Bhd. - Genting Kencana Estate (Subsidiary of Genting Plantations Berhad), project period 1/5/2022 – 1/5/2046 |
| 14 | Genting Oil Mills (Sabah) Sdn Bhd (Mill) | Genting Permai Estate, Sabah, Malaysia | | | | |
| 15 | | Genting Kencana Estate, Sabah, Malaysia | | | | |
| 16 | Genting Oil Mills (Sabah) Sdn Bhd (100%) for estate and mill | Genting Jambongan Estate, Sabah, Malaysia | Supply base for Genting Jambongan Oil Mill, Sabah, Malaysia | Sept 2019 | Certified | None |
| 17 | Genting Plantations Bhd Wawasan Land Progress Sdn Bhd (100%) Genting Oil Mills (Sabah) (Mill) | Genting Sekong Estate, Sabah, Malaysia | Supply base for Genting Trushidup Oil Mill, Sabah, Malaysia | Sept,2017 | Certified | None |
| 18 | Asiaticom Sdn Bhd (100%) Sawit Sukau Usahasama Sdn Bhd(56%) | Genting Suan Lamba Estate, Sabah, Malaysia | | | | |
| 19 | PT Sepanjang Intisurya Mulia (70%) | Mulia 1 & 2 Mulia 3 & 4 Mulia 5 & 6 | Supply base for Mulia Oil Mill, Kalimantan, Indonesia | Oct, 2017 | Certified | None |

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| No | Subsidiaries & Ownership (%) | Name of the Estate and Mills | | TBP for certification | Status as of November 2022 | Any unresolved non-compliances |
|----|--|---|--|-----------------------|----------------------------|---|
| 20 | PT Sawit Mitra Abadi (70%) | Abadi 1 & 2 Abadi 3 & 4 | | | | |
| 21 | PT Sepanjang Intisurya Mulia (70%) | Area 199 Ha Area 1300 Ha | Supply base for Mulia Oil Mill, Kalimantan, Indonesia | Oct, 2025 | Not certified | In Process of NPP In process of obtaining HGU. |
| 22 | PT Sawit Mitra Abadi (70%) | Area 1000 Ha | | | | NPP Process In process of obtaining HGU. |
| 23 | Genting Plantations Berhad (100%) Estate Genting Oil Mills (Sabah) Sdn Bhd (Mill) | Genting Mewah Estate, Sabah, Malaysia | Supply base for Genting Mewah Oil Mill, Sabah, Malaysia | Mar, 2017 | Certified | None |
| 24 | Genting Plantations (WM) Sdn Bhd (100%) | Genting Bukit Sembilan Estate, Kedah, Malaysia | | July, 2017 | Certified | None |
| 25 | PT Globalindo Agung Lestari (60%) | Lamunti Barat Estate Lamunti Timur Estate I & II Mengkatip Estate I & II Bakuta Estate Plasma Timur & Barat | Supply base for Globalindo Oil Mill, Kalimantan, Indonesia | Dec, 2023 | Certified | |
| 26 | PT United Agro Indonesia(60%) | PT UAI 1 & 2 UAI Plasma | | Oct, 2025 | | RaCP complete in October 2022. |

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| No | Subsidiaries & Ownership (%) | Name of the Estate and Mills | | TBP for certification | Status as of November 2022 | Any unresolved non-compliances |
|----|--------------------------------|--|---|-----------------------|----------------------------|--|
| 27 | PT Susantri Permai (95%) | Puroh Estate Masaha Estate Zircon Hill Estate | Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia | Oct, 2025 | Not certified | In the process of obtaining Forest Release and Forest Exchange prior to HGU application. |
| | | SP Plasma | | Oct, 2025 | | |
| 28 | PT Kapuas Maju Jaya (95%) | Waterfall Estate I & II Muhun Estate I & II Talawang Estate I & II | Supply bases for Golden Hill Oil Mill, Kalimantan Indonesia | Oct, 2025 | Not certified | In the process of obtaining Forest Release and Forest Exchange prior to HGU application. |
| | | KMJ Plasma | | Oct, 2025 | | |
| 29 | PT Dwie Warna Karya (95%) | Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate | | | Oct, 2025 | Not certified |
| | | DWK Plasma | | Oct, 2025 | | |
| 30 | PT Citra Sawit Cemerlang (70%) | CSC Estates | Supply base for Mulia Oil Mill | Oct, 2025 | Not certified | In process of obtaining HGU. HCSA report completed review. |
| 31 | PT Surya Agro Palma (70%) | SAP Estate 1&2 SAP Estate 3&4 SAP Estate 5&6 | Supply base for Cemerlang Oil Mill, Kalimantan, Indonesia | Sept, 2025 | Not certified | "In process of obtaining HGU. HCSA report completed review. |
| | | Plasma | | Sept, 2025 | | RaCP Process (annex 5) |
| 32 | PT Agro Abadi Cemerlang (70%) | AAC 1 & 2 | | | | Sept, 2025 |
| | | AAC 3 & 4 | | | | |

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| No | Subsidiaries & Ownership (%) | Name of the Estate and Mills | | TBP for certification | Status as of November 2022 | Any unresolved non-compliances |
|----|---|------------------------------|------------------------------|-----------------------|----------------------------|--|
| | | | | | | HCSA report completed review. Report not published yet. |
| | | Plasma – KSK1, KMB, BSL | | Sept, 2025 | Not certified | RaCP Process (annex 5) |
| 33 | PT Palma Agro Lestari Jaya (70%) | PALJ Estates | | Dec, 2025 | Not certified | In process of obtaining HGU. HCSA report completed review. |
| | | PALJ Plasma | | | | |
| 34 | Knowledge One Investment Pte Ltd (85%)-PT Kharisma Inti Usaha (KIU) | KIU 1 & 2 KIU 3 & 4 | Supply base for KIU Oil Mill | Dec, 2025 | Not certified | NPP in progress. HCV report approved by HCVRN. HCSA report is completed and waiting for peer review. |

3.3 Details of Nonconformities

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

During this Assessment there were Three (3) Critical; Zero (0) Minor nonconformities and two (2) Opportunity For Improvement raised. The Genting Ayer Item Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

| Non-conformity | | | |
|--|--|---------------------|------------|
| NCR Ref # | 2460392-202402-M1 | Issued Date | 23/02/2024 |
| Due Date | 22/05/2024 | Closure Date | 17/05/2024 |
| Indicator & Category (Critical / Minor) | 3.4.1 – Critical | | |
| Statement of Nonconformity: | Environment aspect and impact assessment for estate operations were not comprehensively documented | | |
| Requirement Reference: | In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. | | |
| Objective Evidence: | Genting Sungei Rayat Estate Environment aspect and impact assessment (EAI) dated 22/01/2024 has not comprehensively covered all conditions under normal, abnormal, emergency situation for peat and acid sulphate area i.e., peat, soil acidity and related potential incidents for the said area. | | |
| Corrections: | In the EAI, all conditions under normal, abnormal, emergency situations are included for peat and acid sulfate areas | | |
| Root Cause Analysis: | The person in charge, responsible for preparing the Environment Aspect and Impact Assessment (EAI), failed to include impact assessments for peat and acid sulphate areas due to a lack of knowledge and skills in preparing the (EAI) | | |
| Corrective Actions: | 1. The estate management conduct yearly training for the person in charge for Environment Aspect and Impact Assessment (EAI). 2. The Training Plan is included in the Sustainability Training Program. | | |
| Assessment Conclusion: | Major NC close out verification: i) Genting Sungei Rayat Estate (GSRE) has revised the EIA, dated 6/03/2024 which include all conditions under normal, abnormal and emergency situations for peat and acid sulphate areas. For example, condition under emergency situation has been identified and evaluated in the event of fire during drought season/how weather. ii) Training for person in charge (estate's assistant) was carried out by Sustainability Executive on 1/03/2024. Internal training for estate's team was done on 4/3/2024. iii) Training on Environmental Aspect and Impact and other environmental | | |

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| | <p>related topics has been included in the Annual Training Plan for 2024.</p> <p>iv) Interview with the person in charge has confirmed on the awareness and understanding on the EAI and other environmental component.</p> <p>The implemented correction and corrective action evidence were found to be sufficient to close the NC effectively on 17/5/2024. Continuous implementation will be further verified in the next assessment.</p> |
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| Non-conformity | | | |
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| NCR Ref # | 2460392-202402-M2 | Issued Date | 23/02/2024 |
| Due Date | 22/05/2024 | Closure Date | 17/05/2024 |
| Indicator & Category (Critical / Minor) | 3.6.1 – Critical | | |
| Statement of Nonconformity: | The Risk Control Measures and action plan found not consistently implemented and monitored | | |
| Requirement Reference: | All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. | | |
| Objective Evidence: | <ul style="list-style-type: none"> Observed in the POM, heavy machinery (shovel) operation at loading ramp without emergency light (beacon light) installed. Refer to HIRARC (SP-MGR-01-F01-0) dated 10/02/2018 for Operation of Shovel, Bobcat, Tractor can cause permanent disability or fatality if hit workers. The health effect from risk assessment of hazardous chemical (pesticides) from Spraying and Mechanized Spraying activity to chemical handler/sprayers were not identified and implemented in all estate. The current risk control as in HIRARC Form (HIRARC-GSGE/GKBE/GSRE) found not consistently proposed with action or control measure for risks assessed as medium and high. HIRARC (SP-MGR-01-F01-0) for GSGE found not revised after one year and 5 cases of accident occurred in year 2023 as declared in Form JKPP 8 dated 31/01/2024. Mechanical and ergonomic hazard other than noise exposure of mechanized equipment such as Cantas, Grabber, Spreader (Vicon) not sufficiently assessed. Interviewed and observed at field 14B in Main Division, manual handling risk from lifting fertilizer bags and loading into Vicon bucket that lead to back pain and potential slip disc. Current risk assessment dated 04/01/2024 indicated scored as Medium Risk but not control measure and mitigation action proposed accordingly. (GTBE). | | |
| Corrections: | <p>GAIOM (Finding 1)</p> <p>Install new emergency light (beacon light).</p> | | |

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| | <p>GTBE, GSRE, GSGE & GKBE (Finding 2) Estate management sent all chemical handlers for the medical surveillance by the end of March.</p> <p>GSGE, GKBE, GSRE (Finding 3) Estate management revised all HIRARC with action or control measure for risks assessed as medium and high.</p> <p>GSGE (Finding 4) GSGE management revised HIRARC based on accident occurred in year 2023</p> <p>GTBE, GSRE, GSGE & GKBE (Finding 5) Estate management have revised the HIRARC for mechanized equipment.</p> <p>GTBE (Finding 6) Estate management revised the HIRARC with proper control measure and mitigation action based on the guidelines on ergonomic risk assessment at workplace.</p> |
| Root Cause Analysis: | <ol style="list-style-type: none"> 1. The person in charge failed to identify the absence of an emergency light during a shovel operation at the loading ramp because the workplace inspection checklist did not include checks for emergency lights (beacon light). 2. Based on the recommendation on CHRA report, the estate managements have sent chemical handlers for medical surveillance who are involved in organophosphate and carcinogenic chemicals only. However, the estate management was not aware that, based on RSPO requirements, all chemical handlers should be sent for medical surveillance. 3. The Person In-charge that involved in the HIRARC process are lack the necessary skills or training to effectively identified hazards, assess the risks and implement appropriate control measure. 4. The person in charge involved in the HIRARC process lacks knowledge in revising the HIRARC 5. The person in charge failed to thoroughly identify all potential Hazards associated with the mechanization equipment could lead the inadequate risk assessment and control measure. 6. Due to a lack of necessary skills or training for the person in charge to identify control measures and mitigation actions based on the Risk Assessment for manual handling risk when lifting fertilizer bags and loading them into the Vicon bucket |
| Corrective Actions: | <p>GAIOM (Finding 1)</p> <ol style="list-style-type: none"> 1. Revise the workplace inspection checklist to include the emergency light (beacon light) 2. Update the item into the Preventive Maintenance vehicle checklist 3. Conduct training for supervisors and shovel drivers to inspect their shovels before use. <p>GTBE, GSRE, GSGE & GKBE (Finding 2)</p> <ol style="list-style-type: none"> 1. Safety department issued a Memo for all estate that regarding all chemical handlers yet to attend medical surveillance annually <p>GTBE, GSRE, GSGE & GKBE (Finding 3)</p> |

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| | <p>1. Conduct training for the person in charge on effectively identifying hazards, assessing risks, and implementing appropriate control measures in HIRARC.</p> <p>2. Conduct training evaluation upon the training.</p> <p>GSGE (Finding 4)</p> <p>1. Conduct training for the person in charge on when the HIRARC needs to be revised.</p> <p>2. Conduct training evaluation upon the training.</p> <p>GTBE, GSRE, GSGE & GKBE (Finding 5)</p> <p>1. Conduct training for the person in charge on effectively identify hazards, assess risks, and implement appropriate control measures in HIRARC for mechanization equipment.</p> <p>2. Conduct training evaluation upon the training.</p> <p>GTBE (Finding 6)</p> <p>1. Conduct training for the person in charge to identify control measures and mitigation actions based on the Ergonomics Risk Assessment Guidelines.</p> <p>2. Conduct training evaluation upon the training</p> |
| Assessment Conclusion: | <p>Major NC Close Out Verification:</p> <p>GAIOM (finding 1)</p> <p>1. Preventive Maintenance vehicle checklist for Apr and May 24 were verified.</p> <p>2. Revised workplace inspection checklist to include the emergency light (beacon light) under safety equipment element. Based Apr and May 2024 checklist, non of malfunctioning issue of safety reported.</p> <p>3. Evidence of new emergency light (beacon light) installation was verified. The equipment is fully functioning based onsite verification.</p> <p>4. Purchase Order beacon light for the shovel, ref: GAOM24AN0256 dated 14/3/2024 was verified.</p> <p>5. Training Record for Shovel drivers dated 19/4/2024 was verified together with training evaluation.</p> <p>6. HIRARC for Tractor and Shovel has included the necessary control measure and in line with current practice by GAIOM.</p> <p>GTBE, GSRE, GSGE & GKBE (Finding 2)</p> <p>1. Medical Surveillance records for all chemical handlers were verified for all estates.</p> <p>2. Issued Memo by Safety Department to ensure all workers that expose to chemical send for medical surveillance on annual basis.</p> <p>GTBE, GSRE, GSGE & GKBE (Finding 3)</p> <p>1. Revised HIRARC with action or control measure for risks assessed as medium and high. The latest review was done together with SHO to ensure consistent and correct evaluation of risk for all estate.</p> <p>2. Training and Evaluation record for person In charge on HIRARC</p> <p>GSGE - 20/03/2024</p> <p>GSRE - 21/03/2024</p> <p>GTBE - 1/04/2024</p> <p>GKBE - 22/04/2024</p> |

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| | <p>3. HIRARC (OSH Risk Mgt) Procedure (Revised 2024), ref: OM-GPB-07, rev:1 dated 1/03/2024 was verified. Methodology used for HIRARC is based on DOSH guideline for HIRARC.</p> <p>GSGE (Finding 4)</p> <p>1. Revised HIRARC based on accident occurred in year 2023. Document dated 26/03/2024 was verified and included revised HIRARC after accident occurrence in 2023 and to date 2024.</p> <p>2. Training and Evaluation record for person In charge on HIRARC was carried out on 21/03/2024.</p> <p>GTBE, GSRE, GSGE & GKBE (Finding 5)</p> <p>1. Revised HIRARC for mechanized equipment has been included for the respective estates. For example at GSGE, VICON operation has been risk assessed and included in the HIRARC register, dated 19/0/2024.</p> <p>2. Training and Evaluation record for person In charge on HIRARC verified for all estates</p> <p>GTBE (Finding 6)</p> <p>1. Revised the HIRAC with proper control measure and mitigation action dated 5/4/2024 was verified.</p> <p>2. Training and Evaluation record for person In charge on HIRARC verified dated 1/4/2024.</p> <p>3. Guidelines on Ergonomics Risk Assessment at Workplace dated 2017 available as reference for establishment of ergonomic mitigation issue.</p> <p>The implemented correction and corrective action evidence were found to be sufficient to close the NC effectively on 17/5/2024. Continuous implementation will be further verified in the next assessment.</p> |
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| Non-conformity | | | |
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| NCR Ref # | 2460392-202402-M3 | Issued Date | 23/02/2024 |
| Due Date | 23/05/2024 | Closure Date | 17/05/2024 |
| Indicator & Category (Critical / Minor) | 3.4.3 – Critical | | |
| Statement of Nonconformity: | The effectiveness of implementing the environmental and social management plan was not adequately monitored. | | |
| Requirement Reference: | The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. | | |
| Objective Evidence: | In GAIOM, it was identified two persistent social issues in stakeholder interviews. One involves bat invasions in workers' homes, documented by a Social Impact Assessor in 2019 and 2023, and in a worker's complaint on 21/12/2023. The other issue is about speeding Fresh Fruit Bunch (FFB) and Crude Palm Oil (CPO) transporters, reported by the Internal Audit team in Dec 2022 and the Social Impact Assessor in 2023. | | |

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| | <p>Management attempted to address bat's invasion issue with a trial-and-error approach, causing delays in resolving them. While for speeding transporters, GAIOM issued a letter on 31/01/2023, reminding FFB supplying estates to advise their transporters to maintain speeds below 70km/h. Unfortunately, these measures proved insufficient to address stakeholders' recurring concerns. There are no follow up measures has been done to monitor effectiveness of the action taken with the complainant.</p> <p>An environmental incident (effluent discharge) has occurred in 2023 resulting to the issuance of prohibition notice of operation in October 2023. Suspension/prohibition notice lifted on 5/11/2023 and GAIOM has allowed to proceed with operation. Management plan revised January 2024 has yet to incorporate the specific plan presented to DOE in the latest revised plan.</p> |
| Corrections: | <ol style="list-style-type: none"> 1. Identify the bat damage, and prepare a summary of the bat invasion in the housing area 2. Mill management conduct training to the FFB and CPO drivers to slow down their vehicles. 3. Review the Social Management plan to include plan for bat invasion in the housing area 4. Review the Social Management plan to incorporate recommendations or mitigation action plans. Follow up with affected stakeholders to discuss speeding issues in stakeholder meetings. 5. Mill management reviewed the Environmental Management Plan |
| Root Cause Analysis: | <ol style="list-style-type: none"> 1. Referring to the Social Impact Assessment prepared by the Social Impact Assessor on 02/02/2024, the issues regarding bat invasion in workers' houses and speeding FFB/CPO transporter vehicles have been addressed. However, due to the lack of knowledge and skills of the person in charge who prepared the Social Management Plan, there was a failure to identify a plan and monitoring program to mitigate these issues in the Social Management Plan. 2. An environmental incident (effluent discharge) was resolved in 2023. However, due to the lack of knowledge of the person in charge who prepared the Environmental Management Plan, there was a failure to include a monitoring and mitigation plan for this issue. |
| Corrective Actions: | <ol style="list-style-type: none"> 1. Conduct Social Management Plan Training to the Person In charge. 2. Conduct Environmental Management Plan Training to the Person In-charge. 3. Conduct training evaluation upon the training. 4. Social and environmental training plans are included in the Annual Sustainability Program. |
| Assessment Conclusion: | <p>Major NC close out verification:</p> <ol style="list-style-type: none"> 1. Bat invasions housing summary and planning record dated 15/4/2024 was verified. Work progress from Apr - July 2024 with 6 phases (A-F) until checking and handover validated. 2. Record of housing repair for bat invasions from estate and contractor were verified. Contactor's report dated 23/4/2024 from IP Point Hardware & Machinery Enterprise was sighted. Records of repair work completion as at April 2024 reported. |

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| | <p>3. Training and Meeting minute record (face to face and online) to the FFB and CPO drivers to slow down their vehicles dated 22/04/2024 was verified. Related issues have been discussed to ensure long term solution can be realized with the involvement from other relevant authority and stakeholders.</p> <p>4. Social Management Plan, dated 29/4/2024 has included all related issues with the inputs from participatory process conducted which also covered the latest meeting dated 22/04/2024.</p> <p>5. Environment Management Plan (EMP) dated 23/09/2024 has included related environmental mitigation for the latest environmental incident occurred last year. The latest EMP has the same component of mitigation plan to DOE for GIOAM long term measures to mitigate POME leakage issue.</p> <p>6. Flatbed and Furrow desilting work program 2024 updated (week 14) was verified. Work programme is planned by field; quarter 3 2024 (02P), quarter 4 (06P and 02P)</p> <p>7. Mill discharge desilting program 2024 for (water gate 1 and 2) + final discharge pump was verified. The project was completed by end of April 2024.</p> <p>8. Social management & Environmental Management Training and Evaluation record dated 2/04/2024 was verified together with training evaluation records.</p> <p>9. Revised Annual Sustainability Training Program dated 25/04/2024 was sighted. Inclusion of additional social and environmental is to cover wider range of environmental and social awareness for improvement.</p> <p>The implemented correction and corrective action evidence were found to be sufficient to close the NC effectively on 17/5/2024. Continuous implementation will be further verified in the next assessment.</p> |
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| Opportunity for Improvements | |
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| OFI # | Description |
| OFI 1 | 2460392-202402-I1 <u>Indicator 2.1.2</u> The means to track changes to the laws and regulations to be further improved for updating Legal Requirement Register (LRR) (SMP-GPB-22) applies to Genting Ayer Item Oil Mill and all estate. |
| OFI 2 | 2460392-202402-I2 <u>Indicator 4.2.3</u> Operating units shall further enhance documentation practices, ensuring dates of all recorded complaints, actions taken in response, and acknowledgment of complainants. |

| Positive Findings | |
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| PF # | Description |
| PF 1 | Good cooperation given by the management and sustainability team |

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

| Previous Audit Critical (Major) Non-conformity | | | |
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| NCR Ref # | 2309739-202302-M1 | Issued Date | 24/02/2023 |
| Due Date | 25/05/2023 | Closure Date | 19/05/2023 |
| Indicator & Category (Critical / Minor) | 2.2.2 – Critical | | |
| Statement of Nonconformity: | Specific clauses on meeting applicable legal requirements not fully demonstrated by a third party contractor (FFB Transporter). | | |
| Requirement Reference: | All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. | | |
| Objective Evidence: | <p>Based on sample GSGE FFB Transporter/Contractor: Hiap Soon Trading Co. worker's work agreement of Employee ID: XX-XX05 (Mohd. Khairudin Bin Prayet; IC: 811111-01-6005); Position: Pekerja Harian/Borong/Pajak; Date: 2015, it was found the following:</p> <ul style="list-style-type: none"> • No specific date of agreement except year 2015 only. • No specific work hour written in the agreement. • Only public holiday entitlement of 5 days specified in the agreement, but no annual leave and sick leave entitlement specified in the agreement. • Worker will be paid RM3.30 per MT FFB for transport of FFB from GSGE to GAIOM • Worker will be paid RM15.00 per trip if transporting FFB from GSGE to GAIOM on Sunday <p>Sample payslips of the same workers indicated the following:</p> <ul style="list-style-type: none"> - Payslip (Harvesters) # 2275; Month/Year: Jun'22; Name: Khairudin; Normal Working Days: 31; Field # 38; Bunches/MT: 472.55; Rate: 3.30; Amount: 1559.42; Wages 1559.42 (RM); SGP: 200 (RM); Allowances: 242.06 (RM); Total: 2001.48 (RM); Deductions – Advance: 1000 (RM); EPF: 141 (RM); SOCSO: 7.75 (RM); Total (deductions): 1148.75 (RM); Net Pay: 852.73 (RM); Date: 7/2/2022 - Payslip (Harvesters) # 2622; Month/Year: Aug'22; Name: Khairudin; Normal Working Days: 31; Field # 42; Bunches/MT: 549.58; Rate: 3.30; Amount: 1813.61; Wages 1813.61 (RM); SGP: 200 (RM); Allowances: 457.09 (RM); Total: 2470.70 (RM); Deductions – Advance: 250 (RM); EPF: 201 (RM); SOCSO: 9.25 (RM); Total (deductions): 460.25 (RM); Net Pay: 2010.45 (RM); Date: 7/9/2022 - Payslip (Harvesters) # 2646; Month/Year: Dec'22; Name: Khairudin; Normal Working Days: 31; Field # 45; Bunches/MT: 581.51; Rate: 3.30; Amount: 1918.98; Wages 1918.98 (RM); SGP: 200 (RM); Allowances: 212.65 (RM); Total: 2331.63 (RM); Deductions – Advance: 500 (RM); EPF: 212 (RM); SOCSO: 9.75 (RM); Total (deductions): 721.75 (RM); Net Pay: 1609.88 (RM); Date: 7/1/2023 <p>Based on the sample payslips, it was found the following:</p> | | |

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| | <p>- Number of workdays for month of June 2022 was specified as 31 despite there are only 30 days in June 2022.</p> <p>- No clear indication of legal Labour Act requirement that requires double pay for rest-day work and triple pay for public-holiday work despite the number of work days for all samples are full 31 days of the month with supposedly 1 day a week of off-day and at least 1 entitled public holiday each for month of June 2022 and August 2022.</p> <p>- Allowances paid not clearly described and included in the work agreement.</p> <p>Hence, a Major NC has been raised due to the matter and recurrence of issue within same indicator.</p> |
| Corrections: | <ol style="list-style-type: none"> 1) All contractors were briefed and explained during the internal stakeholder meeting on 27.02.2023. 2) The estate management provided sample of agreement and payslip for contractor to follow as guide. 3) To ensure the contractors pay back the workers for the work done on Sunday (Rest Day Work) and Public Holiday, and that these are reflected accordingly at the updated payslips. |
| Root Cause Analysis: | Lack of monitoring/due diligence by the estate management to ensure that these conditions are complied by the contractors. |
| Corrective Actions: | Brief office clerk on the conditions/components to be stated in the payslip/agreement, and that these conditions/components must be checked/verified during the periodic Due Diligence of 3rd party contractors, before filing. |
| Assessment Conclusion: | <p>Closing of NCR was conducted on-site on 05/05/2023. The following evidence was verified:</p> <ol style="list-style-type: none"> 1) Records of attendance dated 27/02/2023 and training contents that show all contractors engaged by the estate have been briefed on the requirements of having mandatory information in the employment contract and pay slips. 2) Records of attendance that shows admin staff have been trained about the due diligence to be delivered which are checking and following up contractors' documents i.e., the employment contract and pay slip to ensure compliance to legal requirements 3) Newly revised employment contract format which was guided by GPB's format has been used to replace the old version. Information about specific date of agreement, specific working hour, gazetted public holidays, annual and sick leave entitlement has been included in the agreement. The information about double rate i.e., RM6.60/mt instead of RM15.00/trip when working on ret day has also been included. 4) Newly revised pay slips for the months of January to March 2023 have been used to state the amount of paid and deducted of the contractor's employees' wages. The formation of the new pay slip format was guided by GPB's format. It has the information about no. of days work, allowance, and rate of wage when working on rest days and public holidays. <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p> |

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| Effectiveness Closure (for previous audit closed Critical NC): | <p>1) Sighted and verified newly revised employment contract format which stating information about specific date of agreement, specific working hour, gazetted public holidays, annual and sick leave entitlement has been included in the agreement. The information about double rate i.e., RM6.60/mt instead of RM15.00/trip when working on ret day has also been included. Sample of employment contract for all 7 drivers were reviewed accordingly.</p> <p>2) Sighted and reviewed revised pay slips for all 7 drivers for the months of October 2023 to January 2024 which clearly mentioned about no. of days work, allowance, and rate of wage when working on rest days and public holidays.</p> <p>Sighted and reviewed that all 7 drivers were briefed about the revised employment contract and payslip by the owner of contractor and assisted with representative of Genting Sri Gading Estate on 12/08/2023.</p> |
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| Previous Audit Critical (Major) Non-conformity | | | |
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| NCR Ref # | 2309739-202302-M2 | Issued Date | 24/02/2023 |
| Due Date | 25/05/2023 | Closure Date | 19/05/2023 |
| Indicator & Category (Critical / Minor) | 3.6.2 – Critical | | |
| Statement of Nonconformity: | The monitoring of effectiveness of the H&S plan to address health and safety risks to people was not satisfactorily demonstrated. | | |
| Requirement Reference: | The effectiveness of the H&S plan to address health and safety risks to people is monitored. | | |
| Objective Evidence: | <p>At GSGE, there is a store built close to the labour quarters for the purpose of keeping petrol for the consumption of motorized cutter and mist-blower. However, the following lapses were noticed:</p> <ul style="list-style-type: none"> • The entrance door was not locked, hence easy accessibility • No hazard signage • Three out of five 20 liter-jerrycans containing petrol had no labels • Although there were trays put underneath the jerrycans as secondary containments, the floor of the store was still in a soil ground form. This is not in-line with the established guideline. | | |
| Corrections: | Demolished current store and transfer them to the centralised store at our current main petrol store for better monitoring and control, expected date by Mac 2023. | | |
| Root Cause Analysis: | No full enforcement by the management team on the safety features due to interpretation 'Temporary store' as they are not sure whether it's going to be a permanent structure. | | |
| Corrective Actions: | <p>1) Briefing/training to the store clerk & staffs on the safety & environment features, and that any temporary store shall not be exempted from any safety/environment features</p> <p>2) Assessment by Sustainability Dept during Internal Audit</p> <p>3) Brief all workers to keep petrol at the main petrol store for better monitoring and control</p> | | |

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| Assessment Conclusion: | <p>Closing of NCR was conducted on-site on 05/05/2023. The following evidence was verified:</p> <ol style="list-style-type: none"> 1) The temporary store has been dismantled and a centralized petrol store located at the main store compound is currently being used. The centralized store is also opened for workers to keep their petrol if needed. The deq store was also equipped with mitigation features such as concrete flooring & bunding, catchment sump, secondary containment, adequate ventilation, spill kit, and fire extinguisher. With regards to safety, labelling of containers and hazard signage were provided. 2) Attendance record dated 14/04/2023 which was extracted from the Lintramax system that show workers have been briefed during a morning muster about the function of the new centralized store. It was attended by 214 workers. 3) Internal audit report dated 17/04/2023 that shows an internal audit had been conducted on 12-13/04/2023 by the Sr Manager-Sustainability to ensure the adequacy of the newly prepared store. <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p> |
| Effectiveness Closure (for previous audit closed Critical NC): | As verified at the location of mentioned store found it was demolished and currently back to original condition. No recurring chemicals storage issues as action found acceptable and the previous issue is remain closed. |

| Previous Audit Critical (Major) Non-conformity | | | |
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| NCR Ref # | 2309739-202302-M3 | Issued Date | 24/02/2023 |
| Due Date | 25/05/2023 | Closure Date | 19/05/2023 |
| Indicator & Category (Critical / Minor) | 6.7.3 (Major) | | |
| Statement of Nonconformity: | Wearing of appropriate PPE was not implemented by some workers. | | |
| Requirement Reference: | Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. | | |
| Objective Evidence: | <ol style="list-style-type: none"> 1) In the HIRARC document, there is only one term used for feet protection i.e., "Safety Shoes" which can be the metal covered shoes or Wellington boots. It was observed that some tractor drivers were wearing metal covered shoes while some were wearing Wellington boots. This indicates the term used is unclear. 2) During the site tour, some workers did not wear the appropriate PPE during performing their works according to the company's HIRARC and/or SOP such as the following: <ol style="list-style-type: none"> i. GKBE: Grabber tractor driver was wearing Wellington boots instead of safety shoes. ii. GKBE: workshop foreman was wearing regular shoes instead of safety | | |

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| | <p>shoes without any reason</p> <p>iii. GTME: A harvester did not wear safety goggles while working</p> <p>iv. GTME: based on demonstration of putting on canvas to cover the FFB in the trailer, done by a contract FFB truck driver (reg. no. JQY 1185), it was noted that he was having difficulty in wearing the safety harness and seemed to be unsure about where to attach it.</p> <p>v. GTBE: based on information given by the AM, the contract FFB transport drivers at the Chempedak Div. temporary collection centre who are assigned to deliver the FFB to GAIOM, on regular basis the drivers have climbed on top of the FFB which are filled in the bin in order to arrange the FFB and cover them with canvas, without using any safety harness, before leaving to GAIOM. This is not in-line with the required control measures spelt out in the HIRARC.</p> |
| Corrections: | <ul style="list-style-type: none"> - Amend the HIRARC and 'PPE procedure' accordingly for correct term of 'safety shoe - Provide appropriate PPE (i.e., correct shoe type according to the job) based on the latest PPE procedure - Warning letter to the harvester due to his negligence not wearing PPEs (GTME) - Reminder letter to all the transporter contractor/drivers on wearing safety harness (GTME) - To install Safety Harness facility |
| Root Cause Analysis: | <p>1) Unclear term of 'safety shoe' at PPE Procedure, no consultation with SHO, caused HIRARC followed the same term too which caused inconsistent implementation on the ground</p> <p>2) Lack of enforcement on PPE and correct PPE usage:</p> <ul style="list-style-type: none"> i) unclear term of 'safety shoe' for tractor drivers ii) no spare shoe provided to the Foreman. Upon investigation, management found that his first pair of shoes was wet, therefore he left it at home iii) Safety Goggle was provided to the harvester, but he neglects to bring/use it due to harvesting Prime Palm (short palm) in the morning, while later evening he continues at tall palm area (GTME) iv) No monitoring/evaluation to the new lorry driver resulted him unfamiliar with the Safety Harness despite single training provided to him, which caused him failed to demonstrate the Safety Harness wearing (GTME) v) No facility provided to hook the Safety Harness due to interpretation 'Temporary Collection Centre' |
| Corrective Actions: | <ul style="list-style-type: none"> - Refer/consult Safety Health Officer (SHO) on any unclear terms at Safety Procedures; - Continue briefing/training on PPE & SOP to all the workers and lorry drivers; - Conduct evaluation of the training; - PPE monitoring checklist by the mandores/checkers to ensure all workers bring/wear the PPE. |
| Assessment Conclusion: | <p>Closing of NCR was conducted on-site on 05/05/2023. The following evidence was verified:</p> <p>1) Revised HIRARC and PPE procedure to distinguish the terms between safety shoes and Wellington boots.</p> |

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| | <p>2) An inspection checklist (form no.: F/INSP/0004) for lorry and machinery drivers dated 04/03/2023 that shows the PPE checking is done by the field staff to ensure all PPE is worn.</p> <p>3) A warning letter dated 24/02/2023 to the harvester for not wearing adequate PPE while working and a reminder letter dated 25/02/2023 to the contractor for failing to make his worker familiar with safety harness wearing. The main purpose of the letters were to improve discipline in wearing PPE.</p> <p>4) During site visit at FFB collection centre at GTBE Chempedak Division, it was noted that the lifeline facility for safety harness has just been installed and has yet to be used. There was also no FFB loading operation to demonstrate the effectiveness of the facility and therefore this NC could not be closed on that day. Thus, the auditor requested for evidence in a form of video thereafter. The management later submitted videos to the auditor on 19/05/2023 that show lorry driver demonstrate the correct way of using the safety harness while working on top of a loaded lorry bin.</p> <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p> |
| Effectiveness Closure (for previous audit closed Critical NC): | No PPEs issues as mentioned in the finding recurring and site visit as mill and estates found PPEs used and HIRARC clearly defined the type of PPEs as control measures. The previous issue is remain closed. |

| Previous Audit Critical (Major) Non-conformity | | | |
|--|---|---------------------|------------|
| NCR Ref # | 2309739-202302-M4 | Issued Date | 24/02/2023 |
| Due Date | 25/05/2023 | Closure Date | 19/05/2023 |
| Indicator & Category (Critical / Minor) | 7.2.10 – Critical | | |
| Statement of Nonconformity: | The medical surveillance was not adequately followed up. | | |
| Requirement Reference: | Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. | | |
| Objective Evidence: | At GSGE, the last medical surveillance for all the workers exposed to organophosphate was conducted on 19/10/2022. Two of the workers (passport no.: EGxxx6385 and Vxxx4123) were diagnosed to have restrictive lung disorder and requested by the Occupational Health Doctor to repeat a spirometry test on 17/11/2022. However, there was no evidence that shows those workers have been sent for the test. | | |
| Corrections: | To obtain the medical surveillance report dated 17/11/22. (Note – the report was received on 05/03/23) | | |
| Root Cause Analysis: | Repeat Spirometry Test were done on 17/11/2022 and the report received, but the estate unable to find/retrieve the report during the audit day/week due to the report was not immediately refiled after being used for other audit in the previous week. | | |
| Corrective Actions: | To train the office clerk on proper filing for easy retrieval in future. | | |

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| Assessment Conclusion: | <p>Closing of NCR was conducted on-site on 05/05/2023. The following evidence was verified:</p> <p>1) Since the Repeat Spirometry Test report could not be found, the management has requested the OHD to resend a copy of the report. The copy was received on 05/03/2023 and made available for verification.</p> <p>2) Attendance record that shows the PIC for filing i.e., the admin staff have been briefed about proper filing of documents and how to ensure availability after the documents are used.</p> <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p> |
| Effectiveness Closure (for previous audit closed Critical NC): | <p>Copy of Report of Medical Surveillance available (Certificate of Fitness):</p> <p>1. Muhamad Shahrizan Salleh Examination Test Result: FBC/RENAL+ LIVER FUNCTIONS SPIROMETRY TEST (Fit)</p> <p>2. Hendra Examination Test Result: FBC/RENAL+ LIVER FUNCTIONS SPIROMETRY TEST (Fit)</p> <p>No recurrence of issue observed, and the previous issue is remain closed.</p> |

| Previous Audit Critical (Major) Non-conformity | | | |
|---|---|---------------------|------------|
| NCR Ref # | 2309739-202302-M5 | Issued Date | 24/02/2023 |
| Due Date | 25/05/2023 | Closure Date | 19/05/2023 |
| Indicator & Category (Critical / Minor) | 7.3.2 – Critical | | |
| Statement of Nonconformity: | The implementation of Waste Management Plan was not adequate. | | |
| Requirement Reference: | Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. | | |
| Objective Evidence: | <p>There were lapses in the implementation of the Waste Management Plan.</p> <p>Genting Ayer Item Oil Mill</p> <p>During the site visit at the mill housing complex's domestic waste dumping bin, it was sighted that there were scheduled wastes that were not segregated and disposed in accordance with the waste management plans.</p> <p>Genting Sri Gading Estate</p> <p>During the site visit along Field 2018, it was noticed that the polybags used for seedlings during replanting were disposed all around the field. This was not in line with the document "List and Source of Pollutions – Genting Sri Gading Estate (Date: 16/01/2023) which states Source: Nursery Waste – Waste: Used Polybags – Method of Disposal: Disposed as Scheduled Waste.</p> <p>Genting Tebong Estate</p> <p>a. During the site visit at the Scheduled Waste Store, it was noticed that the required SW label sticker were not updated on its Date of Generation. This was</p> | | |

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| | <p>not in accordance with Scheduled Waste Regulation 2005.</p> <p>b. During the assessment at the estate, it was verified that the SW110 – Electrical Waste were disposed via the Electrician appointed to repair electrical parts in the estate. There were no evidence of DOE License approval for the electrician to transport the SW Waste out of the estate's premises.</p> <p>Due to this being a recurrence, therefore a Critical NC is raised.</p> |
| Corrections: | <p>(GAIOM) Collect back the scheduled waste from the domestic waste bin, and dispose at scheduled waste store</p> <p>(GSGE) 2a. To amend the "List & Source of Pollutions" plan accordingly to classify polybags as Recyclable Waste; 2b. To collect back the polybags from field and dispose at 'Recyclable Waste Store'.</p> <p>(GTBE) 3a. Update the 'Date of Generation' accordingly at the labels/stickers on the bins; 3b. Retrain & brief the staffs and electrician that the 'electric/electronic waste' are classified as schedule waste, generated by the estate, and that they shall not be brought outside the estate.</p> |
| Root Cause Analysis: | <p>(GAIOM) Inadequate training to workers, and lack of monitoring by the management on Scheduled Waste management;</p> <p>(GSGE) The polybags were wrongly classified as Scheduled Waste instead of Recyclable Waste at the List and Source of Pollutions; No monitoring on the recovery of the polybags - after planting works completed.</p> <p>(GTBE) Inadequate training to the newly recruited staff/storekeeper; Appointed Electrician have lack of knowledge and awareness on schedule waste management.</p> |
| Corrective Actions: | <p>(GAIOM) Training all employees on scheduled waste management;</p> <p>(GSGE) Any future amendment on the Pollution List/Waste Management plan, shall be submitted to Sustainability Dept for verification; Briefing/training to Field Staff to collect back the polybags after planting.</p> <p>(GTBE) (a) Training to the Storekeeper; (b) Monitoring on the electrician/electrical waste handling - by the Assistant Managers.</p> |

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| | The above actions to be checked during the Sustainability Internal Audit. |
| Assessment Conclusion: | <p>Closing of NCR was conducted on-site on 05/05/2023. The following evidence was verified:</p> <p>GAIOM</p> <ul style="list-style-type: none"> - Scheduled wastes in the domestic waste bin had been transferred to scheduled wastes store - Inventory records in accordance to DOE's Schedule V had been updated that shows the SW from the domestic waste bin was included Attendance record dated 02/03/2023 that shows PIC have been re-trained on SW management <p>GSGE</p> <ul style="list-style-type: none"> - Amended "List & Source of Pollutions" dated 08/03/2023 and updated Wastes Management Plan dated 08/03/2023 that show the used polybags generated from nursery activity has been reclassified from SW to recyclable waste - Used polybags had been collected and stored at recyclable waste store - Attendance record dated 12/04/2023 that shows PIC have been re-trained on used polybags management <p>GTBE</p> <ul style="list-style-type: none"> - Attendance record dated 10/04/2023 that shows the PIC have been trained on monitoring on the electrician/electrical wastes handling and also the correct labelling of SW containers - Electrical wastes have been collected and stored in the SW store - The dates of generation on SW labels have been corrected <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p> |
| Effectiveness Closure (for previous audit closed Critical NC): | Training on waste disposal management included as part of annual sustainability training requirement. For example at GSGE, the latest training on Scheduled Waste Management, Domestic Waste and Recyclable Waste was carried out on 14-15/11/2023. Related training material and records was evident for verification. No recurrence of issue observed and the previous NC is remain closed. |

| Previous Audit Critical (Major) Non-conformity | | | |
|--|--|---------------------|------------|
| NCR Ref # | 2309739-202302-M6 | Issued Date | 24/02/2023 |
| Due Date | 25/05/2023 | Closure Date | 19/05/2023 |
| Indicator & Category (Critical / Minor) | 7.8.2 – Critical | | |
| Statement of Nonconformity: | The buffer zone at GKBE was not established effectively. | | |

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| Requirement Reference: | Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle. |
| Objective Evidence: | During the site visit at the riparian zones at GKBE, it was sighted that the riparian zone was not effectively maintained or restored. Erosion overtime has resulted in the riparian zone width being smaller. Nevertheless, there were no evidence of riparian restoration being done. Furthermore, there were evidence of chemical application done to palms located close to the riverbanks. |
| Corrections: | <ol style="list-style-type: none"> 1) To identify the new buffer zone (for the erosion areas) by Mac'23; 2) All palms within the buffer zone to be marked/ring painted in 'red colour' by Apr 2023; 3) The staff in-charge and the workers to be briefed/trained on the Riparian Zone Management. |
| Root Cause Analysis: | <ol style="list-style-type: none"> 1) The buffer zone became smaller due to erosion. <p>Only alternate palms within the buffer zone were marked - which caused no clear direction/specific briefing that the last palm shall not be sprayed.</p> |
| Corrective Actions: | <ol style="list-style-type: none"> 1) Estate management to monitor the 'new width' of the rivers at erosion prone areas. Annual monitoring based on 'fallen palms' or during SPH (stand per ha) calculation 2) Continue the annual training to the sprayers and manuring team that 'all the marked palms' shall not be sprayed/manured |
| Assessment Conclusion: | <p>Closing of NCR was conducted on-site on 05/05/2023. The following evidence was verified:</p> <ol style="list-style-type: none"> 1) Riparian zone boundary had been revised to suit the change of zone width due to soil erosion of river bank. The marking of the zone was done by painting the oil palms trunk with red colour. 2) Attendance record dated 18/04/2023 that shows the pesticides spraying operators have been re-trained on the restriction of chemical application in the buffer zones. <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p> |
| Effectiveness Closure (for previous audit closed Critical NC): | Monitoring of new width of the river carried out based on HCV monitoring on monthly basis. Monitoring of fallen palm done on annual basis through SPH census. Any deviation of actual condition will be recorded in the checklist for further action. No recurrence of issue observed, thus the previous NC is remain closed. |

| Previous Audit Opportunity for Improvement | |
|--|------------------------------|
| OFI# | Description |
| OFI 1 | OFI Statement: N/A |

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| | Verification / Follow-up actions: N/A |
|--|---|

3.3.2 Summary of the Nonconformities and Status

| CAR Ref. | Category (Critical / Minor) | P&C Indicator | Issued Date | Status & Date (Closure) |
|-------------------|--------------------------------|------------------|-------------|-------------------------|
| 1740419-201902-M1 | Major | 6.1.3 | 15/02/2019 | Closed on 24/04/2019 |
| 1740419-201902-M2 | Major | 2.1.1 | 15/02/2019 | Closed on 24/04/2019 |
| 1740419-201902-N1 | Minor | 4.6.10 | 15/02/2019 | Closed on 20/02/2020 |
| 1740419-201902-N2 | Minor | 2.1.3 | 15/02/2019 | Closed on 20/02/2020 |
| 1886372-202002-M1 | Critical | 6.1.2 | 20/02/2020 | Closed on 23/04/2020 |
| 1886372-202002-M2 | Critical | 6.2.2 | 20/02/2020 | Closed on 23/04/2020 |
| 1886372-202002-M3 | Critical | 7.8.2 | 20/02/2020 | Closed on 23/04/2020 |
| 1886372-202002-N1 | Minor | 6.7.4 | 20/02/2020 | Closed on 25/02/2022 |
| 1886372-202002-N2 | Minor | 7.4.1 | 20/02/2020 | Closed on 24/02/2021 |
| 2165594-202202-M1 | Critical | 6.2.4 | 25/02/2022 | Closed on 20/05/2022 |
| 2165594-202202-M2 | Critical | 6.2.3 | 25/02/2022 | Closed on 20/05/2022 |
| 2165594-202202-N1 | Minor | 3.4.2 | 25/02/2022 | Closed on 24/02/2023 |
| 2165594-202202-N2 | Minor | 6.7.2 | 25/02/2022 | Closed on 24/02/2023 |
| 2165594-202202-N3 | Minor | 7.3.2 | 25/02/2022 | Escalated to Critical |
| 2165594-202202-N4 | Minor | 2.2.2 | 25/02/2022 | Escalated to Critical |
| 2309739-202302-M1 | Critical | 2.2.2 | 24/02/2023 | Closed on 19/05/2023 |
| 2309739-202302-M2 | Critical | 3.6.2 | 24/02/2023 | Closed on 19/05/2023 |
| 2309739-202302-M3 | Critical | 6.7.3 | 24/02/2023 | Closed on 19/05/2023 |
| 2309739-202302-M4 | Critical | 7.2.10 | 24/02/2023 | Closed on 19/05/2023 |
| 2309739-202302-M5 | Critical | 7.3.2 | 24/02/2023 | Closed on 19/05/2023 |
| 2309739-202302-M6 | Critical | 7.8.2 | 24/02/2023 | Closed on 19/05/2023 |
| 2460392-202402-M1 | Critical | 3.4.1 | 23/02/2024 | Closed on 17/05/2024 |
| 2460392-202402-M2 | Critical | 3.6.1 | 23/02/2024 | Closed on 17/05/2024 |
| 2460392-202402-M3 | Critical | 3.4.3 | 23/02/2024 | Closed on 17/05/2024 |

3.4 Stakeholders and previous land owner / user consultation

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

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

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

| Stakeholders contacted | | |
|---|---|--|
| Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities) | Stakeholder name / organization | Means of communication (e.g. face to face interview, email, phone interview, comment from public notice) |
| Internal, Gender Representative, Worker's Union | Representative of Gender Committee, Representative of workers union | Face to face |
| Neighbouring estate | FELCRA Sri Wangi, Porcelin Place Sdn Bhd | Face to face |
| Government Agency | Jabatan Tenaga Kerja Batu Pahat, Pejabat Kesihatan Daerah, Balai Polis Tebong, Sek Keb Seri Bengkal | Face to face |
| Local communities | JPKK Kuala Sunggah, Cattle Breeder, Kg Orang Asli Bukit Putus Kg Parit Semarang | Face to face |
| Contractor | S Tivan Enterprise, GJS Ent, Teo Tuan Kwee Sdn Bhd | Face to face |

| Stakeholders comment | |
|----------------------|---|
| 1 | <p>Feedbacks: Workers Union Representative & Gender Committee Members</p> <p>Audit Team verification and response: Interview session with sample of representative of workers union and gender committee members for each operating unit found that no management interference was observed since during election of workers representative and gender committee. Meetings for both organization was conducted regularly and minutes meeting are reviewed and verified. Discussion on workers right, women's rights, complaint channel and any concern were commonly conducted during the meeting</p> |
| 2 | <p>Feedbacks: FELCRA Sri Wangi, Porcelin Place Sdn Bhd</p> <p>Audit Team verification and response: There are no conflict regards to estate's boundaries since it was clearly demarcated with marking, fences, and trenches. Good relationship between both parties is observed with consistent communication and meetings. Both organisations were invited to external stakeholder session and involved directly upon discussion regards to fire prevention measure accordingly.</p> |
| 3 | <p>Feedbacks: Jabatan Tenaga Kerja Batu Pahat, Pejabat Kesihatan Daerah, Balai Polis Tebong, Sek Keb Seri Bengkal</p> |

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| | Audit Team verification and response: All representative of government agencies acknowledged commitment shown by Genting Plantation Berhad for sustainability effort since they were regularly invited to stakeholder consultation session and related concerns. Balai Polis Tebong also actively patrolling in estate area for crime prevention and has good relationship with management. |
| 4 | Feedbacks: JPKK Kuala Sunggah, Cattle breeder, Kg Orang Asli Bukit Putus Kg Parit Semarang Audit Team verification and response: In general, it was found that relationship between Genting Plantation Berhad's estate and local communities was satisfactory. Cattle breeders for example has been permitted to put their cattles in designated area and regularly briefed about importance of natural weed control by their cattle. There is also limitation especially for immature area which cattle breeders clearly understood. Social contribution by Genting Plantation Berhad especially for local employment also appreciated by local communicates which indirectly improve socio-economy of the village area. |
| 5 | Feedbacks: S Tivan Enterprise, GJS Ent, Teo Tuan Kwee Sdn Bhd Audit Team verification and response: Interview with contractors which among FFB transporter (estate) and CPO transporter (mill) conducted and found that there is no problem on payment terms. All contractors were regular attendees in stakeholder consultation and related training conducted by estate. In addition, contractors also well aware on legal regulation including labour and workers employment terms and condition, wages requirement, safety elements and understanding of environment concern, |

| List of land owner / user contacted | | | | | |
|--|---------------------------|----------------|----------------------|---------------------------------|--|
| Name | Years of ownership / used | Land area (ha) | Agreement (Yes / No) | Agreement base on FPIC (Yes/No) | Compliance on the agreement terms and conditions |
| Not Applicable as Genting Ayer Item Certification Unit have already undergone 2nd Cycle of Replanting. | | | | | |

| Previous land owner / user comment | |
|------------------------------------|--|
| | Feedbacks: N/A |
| | Audit Team verification and response: N/A |




3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

| The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Genting Ayer Item Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Genting Ayer Item Oil Mill is remain certified. | | |
|---|--|--|
| Report prepared by | Acceptance of Assessment Conclusion | Acceptance of Assessment Conclusion |
| Name: Mohamed Hidhir Bin Zainal Abidin | Name: James Chung Khim Hon | Name: Abdul Rahim Wilson Abdullah |
| Company Name: BSI Services Malaysia Sdn Bhd | Company Name: Genting Oil Mill Sdn Bhd | Company Name: Genting Plantations Berhad |
| Title: Lead Auditor | Title: SVP - Group Processing | Title: SVP - Plantation (Malaysia) |
| Signature:  | Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i>  | Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i>  |
| Date: 12/06/2024 | Date: 19/06/2024 | Date: 19/06/2024 |

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Appendix A: Summary of Findings

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|--|------------|
| Principle 1: Behave ethically and transparently | | | |
| Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making. | | | |
| 1.1.1 | (C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance - | <p>Procedures on Requests and Responses with Doc. No.: SMP-GPB-25, Rev. 0 dated 14/08/2014 has been developed by Genting Plantations Berhad as evidence of commitment to define the responsibilities for responding constructively and promptly to information requests from stakeholders.</p> <p>Listed list of publicly available but not limited too as per below:</p> <ul style="list-style-type: none"> • Company's sustainability annual report • Group policies such as Sustainability Policies, Remuneration Policy, Anti Bribery & Corruption Policy, Whistleblower Policy, Code of conducts & Ethics for employees • Reports related to environment such as SEIA • RSPO & MSPO external audit reports • Environment Management Plan • Continuous improvement plan in terms of social, environment and operation activities • Procedure of Complaints and grievances and records | Complied |
| 1.1.2 | Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance - | <p>Sustainability-related policies were exhibited in different areas, such as the main notice boards of the estates/mill, allowing employees and visitors to view them. On-site interviews with selected internal and external stakeholders confirmed that the provided information was presented in appropriate languages and was easily accessible to them.</p> <p>Details of external stakeholder consultation session as below:</p> | Complied |

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| | | <table><tr><th>Estate</th><th>Date</th></tr><tr><td>GKBE</td><td>05/09/2023</td></tr><tr><td>GAIOM</td><td>20//12/2023</td></tr><tr><td>GSRE</td><td>30/11/2023</td></tr><tr><td>GSGE</td><td>18/11/2023</td></tr><tr><td>GTBE</td><td>13/12/2023</td></tr></table> <p>All attended stakeholders were briefed with company’s sustainability commitment, practices, policies, and procedures. Prior to the meeting, estate gathered feedback and responses from stakeholders, and addressing them accordingly.</p> | Estate | Date | GKBE | 05/09/2023 | GAIOM | 20//12/2023 | GSRE | 30/11/2023 | GSGE | 18/11/2023 | GTBE | 13/12/2023 | |
|--------|--|--|----------|------|------|------------|-------|-------------|------|------------|------|------------|------|------------|--|
| Estate | Date | | | | | | | | | | | | | | |
| GKBE | 05/09/2023 | | | | | | | | | | | | | | |
| GAIOM | 20//12/2023 | | | | | | | | | | | | | | |
| GSRE | 30/11/2023 | | | | | | | | | | | | | | |
| GSGE | 18/11/2023 | | | | | | | | | | | | | | |
| GTBE | 13/12/2023 | | | | | | | | | | | | | | |
| 1.1.3 | <p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p> | <p>Stakeholder requests are collected through various channels such as stakeholder meetings, visitor & request books, letters, and forms. The operating units systematically document all requests and responses.</p> <p>Alternatively, estate also collected data of requests via the Joint Consultative Committee (JCC) meeting and Gender Committee Meeting, specifically for internal stakeholders.</p> <p>In GKBE, it was noted that there is letter of request by Kun Fatt Engineering for seeking approval of permission to use estate’s main road for TNB maintenance works.</p> | Complied | | | | | | | | | | | | |
| 1.1.4 | <p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p> | <p>Genting Plantations Berhad has developed Sustainability Management Procedure Manual; Procedures for Consultation and Communication, Doc. No. SMP-GPB-17 with issue dated 12/12/2023. This procedure provides systematic approach to communication and consultation, with the aim of fostering improved</p> | Complied | | | | | | | | | | | | |

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|---|---|---|----------|
| | | <p>working conditions and addressing complaints and grievances from both internal and external stakeholders.</p> <p>The procedure is communicated to all identified stakeholder via annual internal and external stakeholder meeting and to workers through workers committee meeting.</p> | |
| 1.1.5 | <p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p> | <p>The estates and the mill systematically update and maintain a record of stakeholder information, covering particulars like addresses, contact numbers, and nominated representatives. This inclusive list comprises contractors, vendors/suppliers, foreign recruitment agencies, embassies, government agencies, schools, local communities, and CPO/PK customers. The stakeholders' list undergoes an annual update and is promptly revised in case of changes in ownership, land lease, or any new developments in the vicinity.</p> | Complied |
| Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions. | | | |
| 1.2.1 | <p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p> | <p>Genting Plantation Berhad has formalized its Ethical Conduct and Integrity Policy, encompassing a commitment to a code of ethical conduct and integrity. The company integrates the principles of fairness, integrity, and ethics into all business processes. Robust measures are implemented to prohibit any engagement in bribery within the business operations, including recruitment and contracts.</p> <p>It was confirmed that the policy has been communicated and implemented across all Operating Units and at all levels of the workforce. Observed that the policy has been visibly displayed at the offices of each operating unit. For external stakeholders, the policies were briefed during stakeholder consultation, dated 05/09/2023 for GKBE and verified that contractor; JGB Enterprise participated the session.</p> | Complied |

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| 1.2.2 | <p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p> | <p>It was affirmed that monitoring of compliance and implementation was conducted by internal sustainability team from GPB headquarters via annual internal audit. Details of internal audit conducted as table below:</p> <table><tr><th>Estate</th><th>Date</th></tr><tr><td>GKBE</td><td>05/12/2023</td></tr><tr><td>GAIOM</td><td>06/12/2023</td></tr><tr><td>GSRE</td><td>08/12/2023</td></tr><tr><td>GSGE</td><td>10/12/2023</td></tr><tr><td>GTBE</td><td>13/12/2023</td></tr></table> <p>In addition, enforcement among outsourced services conducted through provided sample contractors' agreements, as outlined below.</p> <ol style="list-style-type: none">1. GKBE - Contractor: JGB Enterprise; MOA: Memorandum of Agreement for Contractor (For Contracts with General Work Orders); Agreement No. GKBE/JGBE-GWO/007(24); Contract period: 01/01/2024 – 31/12/20242. GAIOM – Contractor: Teo Tuan Kee Sdn Bhd;CPO Transport Agreement :Agreement GENPprocessing/CPOTransportation/Agreements/GAIOM CPOagmt-TeoTuanKee-2023; Contract period: 01/05/2023-30/04/2025. | Estate | Date | GKBE | 05/12/2023 | GAIOM | 06/12/2023 | GSRE | 08/12/2023 | GSGE | 10/12/2023 | GTBE | 13/12/2023 | Complied |
|---|---|---|--------|------|------|------------|-------|------------|------|------------|------|------------|------|------------|----------|
| Estate | Date | | | | | | | | | | | | | | |
| GKBE | 05/12/2023 | | | | | | | | | | | | | | |
| GAIOM | 06/12/2023 | | | | | | | | | | | | | | |
| GSRE | 08/12/2023 | | | | | | | | | | | | | | |
| GSGE | 10/12/2023 | | | | | | | | | | | | | | |
| GTBE | 13/12/2023 | | | | | | | | | | | | | | |
| Principle 2: Operate legally and respect rights | | | | | | | | | | | | | | | |
| Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations. | | | | | | | | | | | | | | | |

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| 2.1.1 | <p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p> | <p>The compliance to the law and regulation is monitored by the operating units and sustainability team. Among the evidence of compliance verified as below:</p> <p>GKBE:</p> <ul style="list-style-type: none"> • CF for Air Compressor JH PMT 22240 valid until 13/05/2025. • Diesel permit under no. KPDNKK-JB/26/5A/11/7 (PD) (P12)for Diesel (10,000 litres) and Petrol (400 Litres), valid until 01/09/2024. • MPOB license no. 508591102000 under Ladang Asiatic Kulai Besar (2,158.79 Ha) valid until 30/04/2024. • Othman Mohd Nor (HA) registered Grade 1 (Q2219) dated 03/05/2019 under Board of Registration of Estate Hospital Assistant <p>GAIOM</p> <p>The legal compliance found maintained and clearly monitored as below sampled:</p> <ul style="list-style-type: none"> • Found all CF for certificated machinery such as boilers, sterilizer, air compressor and etc found having valid CFs. • Fire Certificate No. 33915 valid until 29/04/2024. • MPOB license no. 500056704000, valid until 31/01/2025 • Permit from KPDNKK ref No. PPDNKK/J/BP/PBK 0069 for storage of Diesel valid till 05/12/2024. • Fume Hoof Written Approval under Regulations 7(5) and 7(6) of CAR 2014. 3 units of Fume Hoods approved by DOE, Johor on 08/10/2018. • Permit to purchase, store, use Sodium Hydroxide under Poison Ordinance, 1952 valid till 31/12/2024. | Complied |
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| | | <ul style="list-style-type: none"> • License to extract water under Johor Water Enactment 1921 valid till 31/12/2014. • CePPOME (Muhammad Azim b. Bani Amin, Bryan Bong Wei Liang) • CePSWaM (Muhammad Azim b. Bani Amin, Bryan Bong Wei Liang) • LEV monitoring by Hygiene Tech (K'ng Cheng Wei) JKPP HQ/18/JHII/00/00013 from Maju Perkasa Sdn Bhd on 05/09/2023 for 3 units Fume Hood. • Others as listed found valid and maintained. <p>GSGE</p> <ul style="list-style-type: none"> • MPOB License No. 524435102000 valid from 01/11/2023-31/10/2024. <p>GTBE</p> <p>Sampled compliance of legal from Statutory Estate License Status:</p> <ul style="list-style-type: none"> • MPOB License No. 501803202000, valid from 01/12/2023-30/11/2024. • Diesel Permit No. SK(M)382/2003(D) from KPDNKK for 10,000 litres valid from 10/08/2024. • CF for Air Receiver Tank MK PMT 5455 valid till 06/01/2024. • License to abstraction of water under Section 15 on Melaka Water Resources 2014 valid from 01/10/2023-30/09/24: <p>Tebong Estate (Lot 981 & 13157 (Pump 3, 2, 1) for agriculture and plantation purpose.</p> | |
| 2.1.2 | A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. - Minor compliance - | In GKBE, GSGE, he Legal Requirement Register (LRR) (SMP-GPB-22) Rev.12 dated 12/12/2023 found updated and amended up to 2022, However the legal identified found not clearly stated the compliance status, PIC (Left blank) Listed and updated to be further | OFI |

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| | | <p>improved and proper mechanism to track changes considering such as:</p> <ul style="list-style-type: none"> • Environmental Quality (Refrigerant Management) Regulations 2020 • Environmental Quality (Refrigerant Management) Regulations 2020 not included and updated • Fire Services (Designated Premise) (Amendment) Orders 2020. Not included and updated • Fire Services (Compounding Offences) (Amendment) Regulations 2020 not included and updated. • Occupational Safety and Health Act (Amendments) 2022 <p>The means for legal update and changes to be further enhanced and improved.</p> | |
| 2.1.3 | <p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p> | <p>In GSRE found Boundary Map Stone Map established from GPS Survey conducted between 14/11/2005-18/11/05 until 18/01/2011.</p> <p>In GTBE (all division) sighted Boundary Stone Map established and prepared by Genting Plantation Research Centre (GPRC) dated and approved on 17/02/23.</p> | Complied |
| Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements. | | | |
| 2.2.1 | <p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p> | <p>GAIOM and its supply base keep records of all contracted parties. This list was accessible in the stakeholder list provided for verification during the assessment.</p> | Complied |
| 2.2.2 | <p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> | <p>Genting Plantations Berhad has established very specific contracts called Memorandum of Agreement (MOA) for appointed contractors. The MOA were available for verification for all contracted parties with the mill and estates. The MOA contains specific clause on meeting applicable legal requirements to them, disallowing young/child/forced/trafficked labour with protection clause should</p> | Complied |

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| | - Minor compliance - | <p>be made in place. Verified MOAs for sample of contractors as table below:</p> <table><tr><td>Estate</td><td>Sample of Contractor</td></tr><tr><td>GKBE</td><td>JGB Enterprise</td></tr><tr><td>GAIOM</td><td>TTK Sdn Bhd</td></tr><tr><td>GSRE</td><td>Bengkil Harapan</td></tr><tr><td>GSGE</td><td>GJS Enterprise</td></tr><tr><td>GTBE</td><td>Arumugam s/o Adekan</td></tr></table> <p>On the other hand, for recruitment agencies, there is implementation of Ethical Responsible Recruitment Procedures for Foreign Workers, outlined in Document Number GEN-13, Revision 06, issued on 3/10/2022. These procedures encompass the due diligence process for foreign worker recruitment agencies. It was observed that a collaborative effort between the HR and Sustainability departments will involve conducting due diligence process for potential foreign worker recruitment agencies, ensuring a meticulous assessment of their qualifications and ethical practices before making any appointment of recruitment agency. As per procedure mentioned, noted that the scoring system was based on 4 criteria which are compliance of legal regulation, service performance, track records and financial capacity and ethical operation practice. The recruitment agency that achieves a score of 80% or higher will be designated as GPB's official recruitment agency.</p> | Estate | Sample of Contractor | GKBE | JGB Enterprise | GAIOM | TTK Sdn Bhd | GSRE | Bengkil Harapan | GSGE | GJS Enterprise | GTBE | Arumugam s/o Adekan | |
| Estate | Sample of Contractor | | | | | | | | | | | | | | |
| GKBE | JGB Enterprise | | | | | | | | | | | | | | |
| GAIOM | TTK Sdn Bhd | | | | | | | | | | | | | | |
| GSRE | Bengkil Harapan | | | | | | | | | | | | | | |
| GSGE | GJS Enterprise | | | | | | | | | | | | | | |
| GTBE | Arumugam s/o Adekan | | | | | | | | | | | | | | |
| 2.2.3 | All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. | The Memorandum of Agreement (MOA) was accessible for verification for all contracted parties associated with the mill and estates. The MOA incorporates a specific clause prohibiting child, | Complied | | | | | | | | | | | | |

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| | - Minor compliance - | <p>forced, and trafficked labor. Verified the sampled MOA/Additional Addendum for sample GAIOM CPO Transporter as following:</p> <ol style="list-style-type: none"> 1. GKBE - Contractor: JGB Enterprise; MOA: Memorandum of Agreement for Contractor (For Contracts with General Work Orders); Agreement No. GKBE/JGBE-GWO/007(24); Contract period: 01/01/2024 – 31/12/2024 2. GAIOM – Contractor: Teo Tuan Kee Sdn Bhd; CPO Transport Agreement; Agreement GENPprocessing/CPOTransportation/Agreements/GAIOM CPOagmt-TeoTuanKee-2023; Contract period: 01/05/2023-30/04/2025. <p>Based on interview session and database of contractor's workers, it was found that there is no workers under 18 years worked for them.</p> | |
| Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources. | | | |
| 2.3.1 | <p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p> | <p>GAIOM</p> <p>In the POM found direct sourced FFB found having information required among others:</p> <p>Genting Sri Gading Estate (GSGE)</p> <ul style="list-style-type: none"> • MPOB License: 524435102000 • 1° 50' 21.49" N , 103° 01' 06.02" E <p>Genting Sri Sungei Rayat Estate (GSRE)</p> <ul style="list-style-type: none"> • MPOB License: 508590202000 • 1° 54' 14.19" N , 103° 00' 38.40" E <p>Genting Kulai Besar Estate (GKBE)</p> <ul style="list-style-type: none"> • MPOB License: 508591102000 • 1° 36' 55.34" N , 103° 36' 39.54" E | Complied |

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| | | <p>Genting Tanah Merah Estate (GTME)</p> <ul style="list-style-type: none"> • MPOB License: 611773002000 • 2° 16' 53.94" N , 102° 33' 37.17" E <p>Genting Tebong Estate (GTBE)</p> <ul style="list-style-type: none"> • MPOB License: 501667602000 • 2° 27' 20.05" N , 102° 21' 38.44" E | |
| 2.3.2 | <p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p> | <p>In GAIOM no indirectly sourced FFB received or from other collection centres, agents.</p> | Complied |
| Principle 3: Optimise productivity, efficiency, positive impacts and resilience | | | |
| Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability. | | | |
| 3.1.1 | <p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p> | <p>As sighted in GKBE, GSGE and GTBE, Business Management Plan for year 2025-2028 was established and documented for projection of Crop Projection, Mature Upkeep Cost, Manuring Cost, Harvesting Cost, Transport cost, General Charges, and Capital Expenditure. Also included Replanting Area, Replanting Expenditure.</p> <p>GAIOM</p> <p>Budget for POM established for 2024-2028 established and documented consisting of:</p> <p>Crop projections (own intake)</p> <p>Production of CPO, PK</p> <p>OER (%), KER (%)</p> <p>Capital expenditure.</p> | Complied |

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| 3.1.2 | An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance - | Sighted Replanting Summary for West Malaysia, which are reviewed annually, were available at each sampled estates and the details are summarised as follows: at each sampled estates and the details are summarised as follows <table><tr><td>Estates</td><td>Area (Ha)</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>GKBE</td><td>98.45</td><td>119.34</td><td>70.62</td><td>94.94</td><td>32.13</td><td>31.17</td></tr><tr><td>GSGE</td><td>147.10</td><td>00</td><td>00</td><td>253.29</td><td>181.42</td><td>121.87</td></tr><tr><td>GTME</td><td>706.54</td><td>138.42</td><td>134.71</td><td>81.29</td><td>281.09</td><td>71.03</td></tr><tr><td>GSRE</td><td>405.40</td><td>51.07</td><td>38.92</td><td>108.59</td><td>126.27</td><td>81.18</td></tr></table> | Estates | Area (Ha) | 2024 | 2025 | 2026 | 2027 | 2028 | GKBE | 98.45 | 119.34 | 70.62 | 94.94 | 32.13 | 31.17 | GSGE | 147.10 | 00 | 00 | 253.29 | 181.42 | 121.87 | GTME | 706.54 | 138.42 | 134.71 | 81.29 | 281.09 | 71.03 | GSRE | 405.40 | 51.07 | 38.92 | 108.59 | 126.27 | 81.18 | Complied |
| Estates | Area (Ha) | 2024 | 2025 | 2026 | 2027 | 2028 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GKBE | 98.45 | 119.34 | 70.62 | 94.94 | 32.13 | 31.17 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GSGE | 147.10 | 00 | 00 | 253.29 | 181.42 | 121.87 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GTME | 706.54 | 138.42 | 134.71 | 81.29 | 281.09 | 71.03 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GSRE | 405.40 | 51.07 | 38.92 | 108.59 | 126.27 | 81.18 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.1.3 | The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance - | Sighted the RSPO, MSPO, ISCC and SCCS Management Review Meeting Minutes (Southern Region) for Genting Plantation Berhad was conducted on 22/01/2024 between 4.00pm-5.30pm at Genting Sri Gading Estate. Attended by GAIOM Mill Managers, All Estate Manager (GSRE, GKBE, GTBE, GTME, GSGE), Representatives from HO, Sustainability and Document Controller. Appropriate issues related to RSPO found adequately discusses to the scale and nature of the activities undertaken. | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.2.1 | (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance - | GAIOM Sighted established Continuous Improvement Plan dated 26/01/2024. • To reduce and maintain the black smoke emission within allowable limit of 20%. | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <ul style="list-style-type: none"> • To reduce BOD at final discharge within allowable limit of 500 ppm. • To improve desludging operation as to minimize impact of effluent waste/sludge to environment. • Maximizing recycling and minimizing waste or by-products generation. • To provide better salary and welfare to workers and family. • Clean water is a scarce resources. Consumption record and conformity to certain safety standard is essential. • To provide adequate safety equipment to employee. (Total objectives 10) <p>GSGE</p> <p>Sighted Continuous Improvement Plan dated 22/01/2024 based on consideration of the main social and environmental impacts and opportunities of the operation unit. Among in the plan included:</p> <ul style="list-style-type: none"> • Optimized yield (increase revenue and production). • Reduce use of certain pesticides (Highly toxic-Class 1A, 1 B, Rat baits etc). • Maximising recycling and minimizing waste or by-products. • Pollution and GHG emission (prevention control and mitigation) • Impact from communities, workers and smallholders on issues <p>GTBE</p> <p>Continuous Improvement Plan dated 05/08/2023 established.</p> <ul style="list-style-type: none"> • Minimize use of certain pesticides (IA, IB, paraquat, Metamindophos) • Waste reduction (maximize recycling and minimize waste generation) | |
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| | | <ul style="list-style-type: none"> • Reduce pollution and GhG emission. • Social Impact (enhance worker's quarters condition) <p>Water consumption and water quality (clean water and meeting standards)</p> | |
| 3.2.2 | <p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p> | <p>The certification unit has completed its RSPO metric template version 2.1 and submitted to the CB prior to the assessment date. Based on verification with input data against various documents such as area statement, land titles, production reports and etc from complete and correct.</p> | Complied |
| Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored. | | | |
| 3.3.1 | <p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p> | <p>The estates (GKBE, GTME operations are guided by Genting Plantation Berhad's Oil Palm Manual. Among the operations covers in the manual are:</p> <ul style="list-style-type: none"> • Land clearing, reparation, planting, and legume covers establishment • Oil palm nursery • Planting density and technique • Soil conservation and terracing • Pest and diseases • Weed management • Manuring | Complied |

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| | | <ul style="list-style-type: none"> • Palm replacement during immaturity • Roads and drainage • Pruning • Harvesting and evacuation • Crop forecast • Managing difficult soils <p>GAIOM established SOP as in the master list issued date 17/11/2021. A total of 43 SOPs established and documented. Among listed:</p> <ul style="list-style-type: none"> • SOP-MGR-01: Duties and Responsibilities. • SOP-MGR-02: Security • SOP-MGR-03: Visitor & Contractor • SOP-PRD-01: Weight Bridge • SOP-PRD-02: FFB Grading • SOP-PRD-03: Loading Ramp • SOP-STO-01: Store • SOP-LAB-01: Mill Laboratory • SOP-LAB-02: CPO & PK Despatch • SOP-MTN-05: Maintenance of Heavy Vehicle <p>In Genting Tebong Estate (GTBE) sighted Oil Palm Manual (Operating Procedure) Rev. 3, Dated April 2021 as memo issued by Sr. Vice President-Group Plantation Advisory dated 11/11/2021. This was and updated of GENP Oil Palm Manual, among updated are:</p> <ul style="list-style-type: none"> • Land clearing, preparation panting, legume covers establishment • Oil palm-Nursery Practices | |
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| | | <ul style="list-style-type: none"> • Planting density and planting techniques • Soil and water conservation • Pest and disease • Weeding-weed management • Manuring • Palm replacement • Road and drainage 'Pruning of fronds • Harvesting • Crop forecast • Managing difficult soils • Mechanization | |
| 3.3.2 | A mechanism to check consistent implementation of procedures is in place. - Minor Compliance - | <p>Genting Plantations Berhad has established mechanism to monitor the implementation of their procedure by visit from Group Plantation Advisory, Agronomist and Sustainability Department, internal audits, and workplace inspection by Safety and health Committee.</p> <p>Sighted Minutes of 17th Dashboard Monthly Meeting on 16/01/2024 prepared by Lee Kar Leong (AVP) in charge of Region 1 & 2 (Malaysia Team). Agenda included:</p> <ul style="list-style-type: none"> • FFB Intake, Capacity Utilization & Throughput • OER, KER, TOL & TKL • Processing Cost & Product Movement. <p>In GSGE sighted Report for Advisory & RIA Visit from 24-26thOctober 2023. The overall assessment mentioned that operating unit was satisfactorily managed and administered.</p> | Complied |

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| 3.3.3 | Records of monitoring and any actions taken are maintained and available. - Minor Compliance - | Among the records of monitoring made available by the operating units were, Internal audit report, Plantation Advisor visit report, Agronomists visit report, and Workplace inspection report, | Complied | | | | | | | | | | | | | | |
|---|--|---|----------------|--------------------|----------|------|-------------|---|-------|-------------|------|---------------|------|---------------|------|---------------|----------------|
| Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations. | | | | | | | | | | | | | | | | | |
| 3.4.1 | (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance - | <p>No new planting activities have been verified in any of the sampled estates, and there are no new operations assessed at the mill. Nonetheless, verified that the social impact assessment has been conducted for GAIOM and supply bases as per table below:</p> <table><tr><th>Operating Unit</th><th>Date of assessment</th><th>Assessor</th></tr><tr><td>GKBE</td><td>4-6/12/2023</td><td rowspan="5">Erika Jesham & Ranina Alya (Executive, Sustainability Department, GPB Headquarter)</td></tr><tr><td>GAIOM</td><td>7-8/12/2023</td></tr><tr><td>GSRE</td><td>13-14/12/2023</td></tr><tr><td>GSGE</td><td>11-12/12/2023</td></tr><tr><td>GTBE</td><td>24-27/10/2023</td></tr></table> <p>It can be confirmed by evidence of reports, photos and interview session with same involved stakeholder, the assessment was conducted via method of field visits, one to one interview and focused group discussion session.</p> <p>The sampled estates have conducted Environmental Aspect and Impact Assessment for estates operation prepared and reviewed by Assistant Managers and approved by Estate Managers. Available guidance on EIA- Score, ranking and etc which consistently applied in the assessment.</p> | Operating Unit | Date of assessment | Assessor | GKBE | 4-6/12/2023 | Erika Jesham & Ranina Alya (Executive, Sustainability Department, GPB Headquarter) | GAIOM | 7-8/12/2023 | GSRE | 13-14/12/2023 | GSGE | 11-12/12/2023 | GTBE | 24-27/10/2023 | Non-compliance |
| Operating Unit | Date of assessment | Assessor | | | | | | | | | | | | | | | |
| GKBE | 4-6/12/2023 | Erika Jesham & Ranina Alya (Executive, Sustainability Department, GPB Headquarter) | | | | | | | | | | | | | | | |
| GAIOM | 7-8/12/2023 | | | | | | | | | | | | | | | | |
| GSRE | 13-14/12/2023 | | | | | | | | | | | | | | | | |
| GSGE | 11-12/12/2023 | | | | | | | | | | | | | | | | |
| GTBE | 24-27/10/2023 | | | | | | | | | | | | | | | | |

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| | | The SOP of Environmental Aspect and Impact (EIA) (SMP-GPB-29) Rev. 01 dated 06/06/18 under Para 7.3 and Environmental Aspect and Impact Register (SP-MGR-02-F01-1) available for verification. However, at Genting Sungei Rayat Estate, environment aspect and impact assessment (EAI) dated 22/01/2024 has not comprehensively covered all conditions under normal, abnormal, emergency situation for peat and acid sulphate area i.e peat, soil acidity and related potential incidents for the said area. Thus, a major NC was raised. | | | | | | | | | | | | | |
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| 3.4.2 | For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. - Minor Compliance - | <p>Based on the assessment conducted, each operating unit has formulated their respective Social Management and Monitoring Plans, complete with action procedures and designated responsibilities for implementation. These plans underwent regular monitoring and updates as per table below:</p> <table><tr><th>Operating Unit</th><th>Date of revised</th></tr><tr><td>GKBE</td><td>20/01/2024</td></tr><tr><td>GAIOM</td><td>30/01/2024</td></tr><tr><td>GSRE</td><td>14/02/2024</td></tr><tr><td>GSGE</td><td>06/02/2024</td></tr><tr><td>GTBE</td><td>02/01/2024</td></tr></table> <p>Based on the external stakeholder interview conducted by the auditor, it can be verified that the operating units consistently kept their involved stakeholders informed about their actions in accordance with the feedback received.</p> <p>All estates and mill have established environment management plans to guide and ensure environmental impacts are continuously</p> | Operating Unit | Date of revised | GKBE | 20/01/2024 | GAIOM | 30/01/2024 | GSRE | 14/02/2024 | GSGE | 06/02/2024 | GTBE | 02/01/2024 | Complied |
| Operating Unit | Date of revised | | | | | | | | | | | | | | |
| GKBE | 20/01/2024 | | | | | | | | | | | | | | |
| GAIOM | 30/01/2024 | | | | | | | | | | | | | | |
| GSRE | 14/02/2024 | | | | | | | | | | | | | | |
| GSGE | 06/02/2024 | | | | | | | | | | | | | | |
| GTBE | 02/01/2024 | | | | | | | | | | | | | | |

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| | | <p>minimised. The environment management plans consist of Waste Management Plan, IPM Management Plans, Water Management Plans, Pollution Prevention Plans and HCV & Biodiversity Management Plans among others. The implementation of the management plans was monitored and verified during the assessment. Sampled the implementations as below:</p> <ol style="list-style-type: none"> 1. Increase of barn owl box ratio according to Oil Palm Manual. 2. Increase of planting area for beneficial plant 3. Disposal of Waste Materials in accordance with SW Regulation 2005. 4. Water Quality Monitoring for Incoming and Outgoing River Water. 5. Monitoring of HCV and Biodiversity Areas. 6. Mill monitoring of Smoke Emission. | |
| 3.4.3 | <p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p> | <p>Based on the external stakeholder interview conducted by the auditor, it can be verified that the operating units consistently kept their involved stakeholders informed about their actions in accordance with the feedback received. Effective implementation of each operating unit to address the social concerns were verified. However, in GAIOM, auditor identified two persistent social issues in stakeholder interviews. One involves bat invasions in workers' homes, documented by a Social Impact Assessor in 2019 and 2023, and in a worker's complaint on 21/12/2023. The other issue is about speeding Fresh Fruit Bunch (FFB) and Crude Palm Oil (CPO) transporters, reported by the Internal Audit team in Dec 2022 and the Social Impact Assessor in 2023.</p> <p>Management attempted to address these issues with a trial-and-error approach, causing delays in resolving them. Regarding the</p> | Non-compliance |

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| | | <p>speeding transporters, GAIOM issued a letter on 31/01/2023, reminding FFB supplying estates to advise their transporters to maintain speeds below 70km/h. Unfortunately, these measures proved insufficient to address stakeholders' recurring concerns. There is no follow up measures has been done to monitor effectiveness of the action taken with the complainants.</p> <p>An environmental incident (effluent discharge) has occurred in 2023 resulting to the issuance of prohibition notice of operation in October 2023. Suspension/prohibition notice lifted on 5/11/2023 and GAIOM has allowed to proceed with operation. Management plan revised January 2024 has yet to incorporate the specific plan presented to DOE in the latest revised plan.</p> <p>Thus, a major non-conformity was raised.</p> | |
| Criterion 3.5: A system for managing human resources is in place. | | | |
| 3.5.1 | <p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p> | <p>Verified that Genting Plantations Berhad has established procedure of recruitment, selection, hiring, promotion for both local and foreign workers.</p> <p>There is Procedure Manual for Manpower Recruitment and Orientation, Doc. No. PM-MR-02; Rev. 00; Issue date: 2/1/2018 specifically for the recruitment of local workers. While for promotion,</p> <p>For the recruitment of foreign workers, the Foreign Workers Ethical Responsible Recruitment Procedures (Doc. No. GEN-13; Rev. 06; Issue date: 3/10/2022) were reviewed to establish control procedures regarding their employment. The procedure distinctly outlined the recruitment, selection, and termination/retirement</p> | Complied |
| 3.5.2 | <p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p> | <p>The review of documents and interview sessions with both local and foreign workers has affirmed the proper implementation of</p> | Complied |

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| | | <p>GPB's employment procedures. Details number of samples taken for each supply base as below:</p> <table><tr><th>Operating Unit</th><th>Local Workers</th><th>Foreign Workers</th></tr><tr><td>GKBE</td><td>3</td><td>8</td></tr><tr><td>GAIOM</td><td>2</td><td>9</td></tr><tr><td>GSRE</td><td>2</td><td>13</td></tr><tr><td>GSGE</td><td>3</td><td>12</td></tr><tr><td>GTBE</td><td>3</td><td>10</td></tr></table> <p>Verified that personal documents was kept in each personal files such as employees application form (local worker), employees's registration card, employee contract agreement in understandable language, copy of identity card/passport/work permit, e-pass government of Malaysia (foreign worker), pre-departure orientation briefing at workers origin country.</p> | Operating Unit | Local Workers | Foreign Workers | GKBE | 3 | 8 | GAIOM | 2 | 9 | GSRE | 2 | 13 | GSGE | 3 | 12 | GTBE | 3 | 10 | |
|---|---|--|-----------------------|---------------|-----------------|------|---|---|-------|---|---|------|---|----|------|---|----|------|---|----|--|
| Operating Unit | Local Workers | Foreign Workers | | | | | | | | | | | | | | | | | | | |
| GKBE | 3 | 8 | | | | | | | | | | | | | | | | | | | |
| GAIOM | 2 | 9 | | | | | | | | | | | | | | | | | | | |
| GSRE | 2 | 13 | | | | | | | | | | | | | | | | | | | |
| GSGE | 3 | 12 | | | | | | | | | | | | | | | | | | | |
| GTBE | 3 | 10 | | | | | | | | | | | | | | | | | | | |
| Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented. | | | | | | | | | | | | | | | | | | | | | |
| 3.6.1 | <p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p> | <p>Hirarc was reviewed on 31/01/2023 covering 64 activities prepared by Mohammad Zulkefli Zakaria and approved by Elangovan Manivellu (Estate Manager). The Risk Matrix 4 X 4 scoring used in the assessment. 1-2: Low Risk, 3-6: Medium and 7-15: High Risk. Based from the format found the Existing Risk Control not properly applied as it was considered after the assessment (likelihood X Severity), Effective current risk control will determine the risk to be assessed. All Medium and High Risk were recommended with action plan and PIC.</p> | <p>Non-compliance</p> | | | | | | | | | | | | | | | | | | |

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| | | <p>GAIOM</p> <p>Hirarc (SP-MGR-01-F01-00 was revised for Operation of Boiler dated 14/02/2023 under Activity: Boiler. However the score of Likelihood X Risk (1 X 4 = Medium). Likelihood 1: can never happen/ never happen, 2: Sometime, never happen in the last 3 years. This was not consistently used in assessment. The column for current risk control not in the right location (after risk assessment).</p> <p>Sampled Shovel activity sighted no emergency light (beacon light) installed for heavy machinery. Hirarc (SP-MGR-01-F01-0) dated 10/02/2018 for Operation of Shovel, Bobcat, Tractor. Risk is Medium. Risk control measure for fatality from operation mentioned: Make sure brake and reverse siren functioning. No mentioned warning lights. Similarly Operation of Loading Ramp from shovel activity can cause permanent disability or fatality dated 10/02/2018 also not mentioning emergency lights fir risk scored medium. New control measure also not mentioned.</p> <p>GSRE</p> <p>Hirarc was reviewed on 29/01 2024 and covering 67 operation is estate such as harvesting, manuring, spraying, rat baiting, handling LPG< gas and acethylene, driving of tractors, landfill operation, office activity and etc. Risk Matrix Table (likelihood X Severity) using 4 scales. Mentioned in the Abstract that methodology for Hirarc is as recommended by JKPP Guidelines.</p> <p>GSGE</p> <p>5 reported Accidents in year 2023 as sampled from not lead to review of Hirarcs as required.</p> <p>GTBE</p> | |
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| | | <p>Hazard and risk were identified and assessed dated January 2024 activities and operation included:</p> <ul style="list-style-type: none"> • Tree cutting using chain saw • Pekerja Mengandung • Working under sunlight • Grass cutting • Manuring • Spraying • Harvesting • Chemical mixing and premix Workshop and etc. <p>Thus, a major NC was raised.</p> | |
| 3.6.2 | <p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p> | <p>GAIOM established and dated 22/01/2024 Safety and health Management Plan 2024. This OSH Plan contains among others:</p> <ul style="list-style-type: none"> • OSH policy • OSH Objectives, Target and Programme. • Training Plan for year 2024 • OSH Coordinator • OSH Safety and Health Committee Meeting • Hirarc • ERP and ERT • Workplace Inspection and audit • OSH Action Plan (Define action plan for OSH Objectives with PIC, Completion Date and Status Progress clearly stated) • OSH Monitoring Schedule for year 2024 (CHRA, LEV Monitoring, Noise Audiometric Test, CHRA etc). | Complied |

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| | | <ul style="list-style-type: none"> • OSH Budget (Expenses allocation) <p>GSGE</p> <p>Safety and Health Management Plan established and documented, implemented as plan dated 07/02/2024. This OSH Plan contains among others:</p> <ul style="list-style-type: none"> • OSH policy • OSH Objectives, Target and Programme. • Training Plan for year 2024 • OSH Coordinator • OSH Safety and Health Committee Meeting • Hirarc • ERP and ERT • Workplace Inspection and audit • OSH Action Plan (Define action plan for OSH Objectives with PIC, Completion Date and Status Progress clearly stated) • OSH Monitoring Schedule for year 2024 (CHRA, LEV Monitoring, Noise Audiometric Test, CHRA etc). • OSH Budget (Expenses allocation) | |
| Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained. | | | |
| 3.7.1 | <p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p> | <p>OSH Programme and Training for 2023 (Jan- Dec) in GKBE covering main topic of:</p> <ul style="list-style-type: none"> • OSHA 1994 & FMA 1967 • OJT Training Programme • OSH requirements & Other Training • CHRA <p>The planned and actual were clearly stated.</p> | Complied |

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| | | <p>GAIOM</p> <p>Training Need Analysis Report 2024 contains List of Annual training:</p> <table><tr><th>Training</th><th>Frequen cy</th><th>Target Group</th></tr><tr><td>Scheduled waste management</td><td>Yearly</td><td>Executive, Section head, Storekeeper, Admin</td></tr><tr><td>Management of Domestic waste</td><td>Yearly</td><td>All worker</td></tr><tr><td>Chemicals and spill management</td><td>Every 2 Years</td><td>Executive, Section head, Storekeeper, Lab, Maintenance, Driver, Boiler, Engine driver, WTP</td></tr><tr><td>Noise Awareness</td><td>Yearly</td><td>All worker</td></tr><tr><td>PPE</td><td>Yearly</td><td>All worker</td></tr><tr><td>Hearing conservation and etc.</td><td>Yearly</td><td>TTS workers</td></tr></table> <p>GSGE</p> <p>Available (Executives/Staff/Workers) Training Needs Analysis and Plan for Year 2023. Signed and approved by Estate Manager (Ravinthiran Kandasamy) dated 11/09/2023.</p> <p>GTBE</p> <p>For year 2024, a Training Programme established and documented (January-December) consist of:</p> | Training | Frequen cy | Target Group | Scheduled waste management | Yearly | Executive, Section head, Storekeeper, Admin | Management of Domestic waste | Yearly | All worker | Chemicals and spill management | Every 2 Years | Executive, Section head, Storekeeper, Lab, Maintenance, Driver, Boiler, Engine driver, WTP | Noise Awareness | Yearly | All worker | PPE | Yearly | All worker | Hearing conservation and etc. | Yearly | TTS workers | |
|--------------------------------|---------------|---|----------|---------------|--------------|----------------------------|--------|---|------------------------------|--------|------------|--------------------------------|---------------|--|-----------------|--------|------------|-----|--------|------------|-------------------------------|--------|-------------|--|
| Training | Frequen cy | Target Group | | | | | | | | | | | | | | | | | | | | | | |
| Scheduled waste management | Yearly | Executive, Section head, Storekeeper, Admin | | | | | | | | | | | | | | | | | | | | | | |
| Management of Domestic waste | Yearly | All worker | | | | | | | | | | | | | | | | | | | | | | |
| Chemicals and spill management | Every 2 Years | Executive, Section head, Storekeeper, Lab, Maintenance, Driver, Boiler, Engine driver, WTP | | | | | | | | | | | | | | | | | | | | | | |
| Noise Awareness | Yearly | All worker | | | | | | | | | | | | | | | | | | | | | | |
| PPE | Yearly | All worker | | | | | | | | | | | | | | | | | | | | | | |
| Hearing conservation and etc. | Yearly | TTS workers | | | | | | | | | | | | | | | | | | | | | | |

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| | | <ul style="list-style-type: none"> • Refresher training on SOP, CHR & Company policies to all Workers (Jan) • Refresher training on SOP, CHRA for harvester to Harvesters (Feb) • Refresher training on SOP, CHRA for Sprayer to Sprayers/Weeders (Feb) • Refresher training on SOP, CHRA for tractor driver (Mac) • Refresher training on SOP, CHRA for Workshop & Gen Set Operator, Wtp (Mac). • IPM Training for Executive and Staff (May) • Safe use of pesticides and calibration training for Sprayer, weeder and storekeeper (Mac) • Riparian Buffer zone for Sprayer, Weeder (Mac) • NRA & Noise Training for all workers (Mac) and total 27 trainings in the plan. | |
| 3.7.2 | Records of training are maintained. - Minor Compliance - | <ul style="list-style-type: none"> • Noise Training for Driver was conducted on 09/02/2023 and attended 9 workers. • Fire Extinguisher Training conducted on 27/01/2024 and attended 25 workers. • First Aid Training was conducted on 26/01/2024 and attended by 16 workers. • PPE and Safety Steps Training was conducted on 18/11/2023 and attended by 3 workers from workshop was conducted on • Complaints and Grievance Training was conducted on 13/10/2023 and attended by 125 workers. • Company Policies was briefed on 10/10/2023 during Morning Muster and attended by 125 workers. | Complied |

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| | | <ul style="list-style-type: none">• Harvesting Training was conducted on 25/09/2023 and attended by 7 workers and on 05/09/2023 attended by 20 workers.• Training for Tractor Driver was conducted on 07/09/22023 and attended by 29 workers.• Workshop SOP Training was conducted on 28/08/2023 and attended by 4 workshop staff.• Chemical Premix Training was conducted on 08/06/2023 and attended by 3 workers.• Spraying technique with Alion was conducted on 28/04/2023 and attended by 10 workers.• Road Crossing Training was conducted on 16/04/2023 and attended by 8 workers. <p>GSGE</p> <p>Sighted training records maintained as sampled:</p> <ul style="list-style-type: none">• Training on sustainability Best Practices for RSPO, MSPO, ISCC on 14/11/2023, attended by 7 workers.• Training on Sustainability Management Procedure Manual (SMPM) on 14-15/11/2023 and attended by 7 workers.• Training on Scheduled Waste Management, Domestic Waste and Recyclable Waste was conducted on 14-15/11/2023 and attended by 7 workers.• Training on Social Management. <p>GTBE</p> <p>Sighted training records maintained and available conducted for years 2023.</p> | |
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| 3.7.3 | Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor Compliance - | Sighted record of training for SCCS as Training List updated 03/12/2023. Training of Traceability and Supply Chain was conducted between 10-11/12/2022 attended by 102 workers. | Complied |
| Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C) . However, it will not contribute to suspension if there is more than 5 non-compliance within a principle) | | | |
| 3.8.1 | Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable. | The mill has only received all the certified FFB from its certified estates which belong to Genting Plantations Berhad. Sustainability Management Procedure Manual Title: Supply Chain and Traceability (Palm Oil Mill); Doc. # SMP-GPB- 23; Rev. 14; Issue date: June 2022 was available for verification. It was developed to implement the IP supply chain system at the POM. The procedure has covered the incoming FFB, outgoing CPO & PK at RSPO certified mills that operate IP supply chain system. | Complied |
| 3.8.2 | Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB. | NA. The mill opted for IP. | Complied |
| 3.8.3 | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in Table 10 of this public summary report | Complied |

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| | the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report. | | |
| 3.8.4 | The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform. | The mill is registered in the PalmTrace with the following details: <ul style="list-style-type: none"> - License ID: CB135449 - Members Name: Genting Ayer Item Oil Mill - Members ID: RSPO_PO 1000002439 - Licence valid until 25/06/2024 | Complied |
| 3.8.5 | <p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. | <p>GPB has developed procedures to implement the elements of the applicable supply chain model as follows:</p> <p>Sustainability Management Procedure Manual Title: Supply Chain and Traceability (Palm Oil Mill); Doc. # SMP-GPB-23; Rev. 14; Issue date: June 2022.</p> <p>Under clause 15.0 of the procedure the Mill Manager has the overall responsibility and authority over the implementation of the procedure, requirements, and compliances with all the applicable RSPO Supply Chain Certification Standard.</p> | Complied |
| 3.8.6 | Internal Audit | The implementation of the RSPO SCCS internal audit is guided by the Supply Chain and Traceability (Palm Oil Mill) procedure. The last internal audit was conducted on 05-06/12/2023 by the | Complied |

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| | <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p> | <p>Sustainability Sr. Manager. The audit was conducted in tandem with the RSPO P&C and MSPO OPMC schemes. Based on the audit checklist and audit report, all clauses in RSPO SCCS and RSPO Market Communications and Claims were adequately covered. There was no non-conformity raised related to RSPO SCCS.</p> | |
| 3.8.7 | <p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p> | <p>The mill only receives FFB from own supplying bases and the weighbridge clerks have checked the incoming documents from supplying bases to ensure all the information is available. Sampled of dispatch notes from supply bases as below:</p> <p><u>Genting Kulai Besar Estate</u> WB ticket Number: NFFB24000047W, Estate's DO: 65242 Date of delivery: 29/01/2024 Weight/truck/field/bunches: 17.75/JSJ6619B/WKB4P97CJ/913</p> <p><u>Genting Sri Gading Estate</u> WB ticket Number: FFB240000238W, Estate's DO: 22490-6 Date of delivery: 28/01/2024 Weight/truck/field/bunches: 13.14/JSN1822/WSG1P06BE/810</p> | Complied |

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| | | There has been no projected overproduction. Nonetheless, based on interview with the staff, the facility is aware of this requirement. The mechanism for handling non-conforming oil palm products and/or documents is addressed under Control of Non-conforming Product [PM-PRD- 05, rev. 0, dated 02/01/2018] which describes the non-certified material or product shall be kept segregated from the certified ones. | |
| 3.8.8 | <p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. | <p>All the information required by the standard was available in various shipping documents such as mill's weighbridge. Sampled of the sales and goods out as below:</p> <ol style="list-style-type: none"> Contract No.: SGMWM/CPO/2310/A03 <ol style="list-style-type: none"> The name and address of the buyer – XXX The name and address of the seller – Genting Ayer Item Oil Mill, Johor The loading or shipment / delivery date – 9/11/2023 The date on which the documents were issued – October 2023 RSPO Certificate number – RSPO 653474 A description of the product, including the applicable supply chain model (Identity Preserved, Segregated, Mass Balance, or the approved abbreviations) – RSPO IP CPO The quantity of the products delivered – 44.64 MT Any related transport documentation – Weighbridge Ticket# CPOIP23000235W A unique identification number(s) – TR-6b3aefe0-0b0b | Complied |

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| | | <p>2) Contract No.: SGMWM/PK/2306/A02</p> <ul style="list-style-type: none"> a. The name and address of the buyer – XXX b. The name and address of the seller – Genting Ayer Item Oil Mill, Johor c. The loading or shipment / delivery date – 28/07/2023 d. The date on which the documents were issued – June 2023 e. RSPO Certificate number – RSPO 653474 f. A description of the product, including the applicable supply chain model (Identity Preserved, Segregated, Mass Balance, or the approved abbreviations) – RSPO IP PK g. The quantity of the products delivered – 45.23 MT h. Any related transport documentation – Weighbridge Ticket# PKIP23000119W i. A unique identification number(s) – TR-170b058b-447f | |
| 3.8.9 | <p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes | <p>There is no outsourcing activity related to processing and storage except for transporter of CPO. Seen the agreement for the CPO transporters dated 1/05/2023 for Teo Tuan Kwee Sdn Bhd. Requirements of RSPO, ISCC, MSPO and OSHA was stated clearly in the agreement signed by the contractors. The content of the contract depicted that GPB has the legal ownership of the product carried. The contractor shall ensure to provide cooperation and relevant access to the appointed Certification Bodies into their</p> | Complied |

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| | <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p> | <p>respective operations, systems and any and all information when this is announced in advance.</p> | |
| 3.8.10 | The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products. | The mill has recorded the details of the contractors engaged by the mill in the stakeholder list. | Complied |
| 3.8.11 | The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products. | There were no new contractors used for the physical handling of RSPO certified products by the mill. | Complied |
| 3.8.12 | <p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> | <p>Genting Ayer Item Oil Mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p> <p>Retention period of all supply chain documented information retained for more than two years as per sample sighted in indicator 3.8.7 - 3.8.9 above.</p> <p>All the inventory records are maintained and updated on daily basis/real time and reconcile monthly. Daily records are prepared at the entry point at the weighbridge.</p> | Complied |

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| | <p>iv) For Mass Balance Module, the mill:</p> <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). | | |
| 3.8.13 | <p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p> | The OER and KER are measured on daily basis based on actual production, aggregated and reported on daily, weekly, monthly and annually basis through the mill production report | Complied |
| 3.8.14 | <p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p> | The OER and KER are measured on daily basis, aggregated and reported on daily, weekly, monthly and annually basis through the mill production report. | Complied |
| 3.8.15 | <p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p> | Genting Ayer Item Oil Mill only processes certified FFB from its own certified supply base therefore only produces certified CPO and PK in the mill. Therefore, there is no necessity to segregate the palm products as there are no non-certified products in the mill. | Complied |
| 3.8.16 | <p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to</p> | The actor is a Palm Oil Mill, and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. Based on the downloaded transactions register from the | Complied |

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| | refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform. | Certification Unit's PalmTrace, the company was able to demonstrate that it has been registering its transactions in the PalmTrace accordingly as reported under 3.8.8. | |
| 3.8.17 | Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims. | RSPO trademark was not used. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. | Complied |
| General corporate communications | | | |
| 4.1 | A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim. | GPB has stated their RSPO membership in the company's website (https://www.gentingplantations.com) and in their annual Sustainability report. | Complied |
| 4.2 | In corporate communications, a member is allowed to: A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member's history with regard to RSPO E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership | GPB's website has been reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil. The website had not displayed the RSPO website and had not display any RSPO Trademark. | Complied |
| 4.3 | Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat. | No RSPO corporate logo used by GPB. | Complied |
| 4.4 | In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products. | No misleading statement made by the company as verified on the website | Complied |

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| 4.5 | <p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> • “We have been sourcing RSPO certified palm oil since (YEAR).” • “We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year.” • “We have been RSPO certified since (YEAR).” • “We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil.” • “In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified.” • “Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits.” • “We are RSPO certified. Ask us for our RSPO certified products.” | No misleading statement made by the company as verified on the website | Complied |
| 4.6 | <p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <ol style="list-style-type: none"> “The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR).” X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim. <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: “This reported figure is not audited through RSPO Certification”.</p> | No misleading statement made by the company to make product-related claims in their corporate communication as verified on the website | Complied |

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| Product-specific communications | | | |
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| 5.1 General | | | |
| 5.1.1 | Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. | No product specific communications made about an individual product that contains RSPO certified sustainable palm oil made by GPB. | Complied |
| 5.1.2 | Product-specific communications are voluntary. | No product specific communications made about an individual product that contains RSPO certified sustainable palm oil made by GPB | Complied |
| 5.1.3 | Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself. | No RSPO label displayed for product-specific communications made by Genting Ayer Item POM | Complied |
| 5.1.4 | Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication. | No RSPO label displayed for product-specific communications made by Genting Ayer Item POM | Complied |
| 5.1.5 | <p>If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. | Not applicable. Genting Ayer Item POM is not producing end products which involve retailers, traders or distributors. | Not Applicable |

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| | <ul style="list-style-type: none"> The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. | | |
| 5.1.6 | Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain | Not applicable. Genting Ayer Item POM is not producing end products which involve retailers, traders or distributors. | Not Applicable |
| 5.2 Off pack claims | | | |
| 5.2.1 | Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made. | No off-pack claim made in any product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. | Complied |
| 5.2.2 | When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made. | If there is any physical RSPO claim, Shipping documentation will be verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e product/commodity with SCC model (CPO/Palm Kernel RSPO IP) and RSPO certificate number. | Complied |
| 5.2.3 | Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options: | Genting Ayer Item POM is not under distributor or wholesaler category. Thus, this requirement is not applicable. | Not Applicable |

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| | <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. | | |
| 5.3 On pack claims | | | |
| 5.3.1 | Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D. | Not applicable as no on pack claims made by Genting Ayer Item POM | Not Applicable |
| 5.3.2 | <p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p> | Not applicable as no on pack claims made by Genting Ayer Item POM | Not Applicable |
| | <p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* | Not applicable as no on pack claims made by Genting Ayer Item POM | Not Applicable |

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| | <ul style="list-style-type: none"> Contains RSPO certified palm oil (MB)* *Add RSPO TM Licence Number below or next to the claim. | | |
| | C) For Partially Certified Products: <ul style="list-style-type: none"> RSPO 50% MIXED* Contains at least 50% RSPO certified palm oil* *Add RSPO TM Licence Number below or next to the claim. | Not applicable as no on pack claims made by Genting Ayer Item POM | Not Applicable |
| | D) For Products covered with Book and Claim (B&C): <ul style="list-style-type: none"> RSPO CREDITS* Supports the production of RSPO certified palm oil* Contains palm oil covered by the purchase of RSPO Credits* *Add RSPO TM Licence Number below or next to the claim. | Not applicable as no on pack claims made by Genting Ayer Item POM | Not Applicable |
| 5.3.3 | On pack claims shall not include information about the claimant's RSPO membership status. | Not applicable as no on pack claims made by Genting Ayer Item POM | Not Applicable |
| 5.3.4 | Members shall not communicate to consumers information about their suppliers' RSPO membership status. | Not applicable as no on pack claims made by Genting Ayer Item POM | Not Applicable |
| 5.3.5 | Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient. | Not applicable as no on pack claims made by Genting Ayer Item POM | Not Applicable |
| 5.3.6 | All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal. | Not applicable as no on pack claims made by Genting Ayer Item POM | Not Applicable |
| MODULE A – IDENTITY PRESERVED | | | |
| | 95% of the palm oil content must be RSPO IP certified. | Oil palm content in the CPO and PK is 100% RSPO IP-certified. | Complied |
| | If 100% of RSPO IP certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified | There is no percentage of non-certified oil palm within the products as the mill accepts only RSPO certified FFB. | Complied |

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| | palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume. | | |
| Messaging | | | |
| | <p>Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:</p> <ul style="list-style-type: none"> • The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org • RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain. www.rspo.org • Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org | Genting Ayer Item POM has not made any product-specific communications in any RSPO IP product claims | Complied |
| Product-Specific Communications Labelling | | | |
| | <p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO Trademark that includes the tag "CERTIFIED"; or • RSPO Trademark that includes the tag "This product contains certified sustainable palm oil". | Genting Ayer Item POM has not made any product-specific communications in any RSPO IP product claims | Complied |
| Principle 4: Respect community and human rights and deliver benefits | | | |
| Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders. | | | |
| 4.1.1 | (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented, and communicated to all levels of the workforce, operations, FFB suppliers | Genting Plantations Berhad formulated Social Policy (endorsed date,14/09/2020) and Whistleblower Policy (endorsed date,01/06/2020), signed by their President & Chief Operating | Complied |

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| | and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces. - Critical (Major) compliance - | Officer. Both policies evident that GPB upholds human rights and advocates for adherence to international human rights laws. They safeguard against reprisals for human rights defenders who raise legitimate complaints. In addition, GPB also adopted the established Complaints and Grievances procedure, Doc. No.: SMP-GPB-19, Revision 4, dated 01/03/2020 to provide guidelines for managing complaints and grievances involving internal and external stakeholders. Communication of policy was sighted in regular roll call briefing report, internal and external stakeholder meeting as well as induction program for newly join foreign workers. | |
| 4.1.2 | The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance - | Interviews conducted with a sample of workers at each estate and mill revealed no evidence of violence or harassment in their operational activities. All personnel are treated equitably and safeguarded from any discrimination that could infringe upon their human rights. | Complied |
| Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties | | | |
| 4.2.1 | (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance - | Genting Plantations Berhad formulated Social Policy (endorsed date,14/09/2020) and Whistleblower Policy (endorsed date,01/06/2020), signed by their President & Chief Operating Officer. Both policies evident that GPB upholds human rights and advocates for adherence to international human rights laws. They safeguard against reprisals for human rights defenders who raise legitimate complaints. In addition, GPB also adopted the established Complaints and Grievances procedure, Doc. No.: SMP-GPB-19, Revision 4, dated 01/03/2020 to provide guidelines for managing complaints and grievances involving internal and external stakeholders. The procedure clearly explained the methods of complaint established which are individuals can voice their concerns and have | Complied |

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| | | <p>them recorded in the complaint and grievance book; complaints can be submitted in writing via post, SMS, or by placing them in the complaint and suggestion box; alternatively, individuals can file their complaints directly with the head office in Kuala Lumpur.</p> <p>The procedure also specifies that any received complaint must be addressed within one month of its receipt. After the action has been taken, there is a commitment to obtain feedback on the effectiveness of the implemented measures within seven days.</p> | | | | | | | | | | | | | |
|--------|--|--|--------|------|------|------------|-------|-------------|------|------------|------|------------|------|------------|----------|
| 4.2.2 | <p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p> | <p>GPB adopted the established Complaints and Grievances procedure, Doc. No.: SMP-GPB-19, Revision 4, dated 01/03/2020 to provide guidelines for managing complaints and grievances involving internal and external stakeholders. Alternatively, individuals may use CARELINE number to directly issues their concerns directly to head office in Kuala Lumpur. The memo of the implementation of CARELINE number can be sighted on the entrance of the mill office, estate office, sundry shops and food shops.</p> <p>While communication of the procedures was verified during to daily morning rollcall in addition to internal and external stakeholder session as table below:</p> <table><tr><th>Estate</th><th>Date</th></tr><tr><td>GKBE</td><td>05/09/2023</td></tr><tr><td>GAJOM</td><td>20//12/2023</td></tr><tr><td>GSRE</td><td>30/11/2023</td></tr><tr><td>GSGE</td><td>18/11/2023</td></tr><tr><td>GTBE</td><td>13/12/2023</td></tr></table> <p>GPB adopted the established Complaints and Grievances procedure, Doc. No.: SMP-GPB-19, Revision 4, dated 01/03/2020 to provide</p> | Estate | Date | GKBE | 05/09/2023 | GAJOM | 20//12/2023 | GSRE | 30/11/2023 | GSGE | 18/11/2023 | GTBE | 13/12/2023 | Complied |
| Estate | Date | | | | | | | | | | | | | | |
| GKBE | 05/09/2023 | | | | | | | | | | | | | | |
| GAJOM | 20//12/2023 | | | | | | | | | | | | | | |
| GSRE | 30/11/2023 | | | | | | | | | | | | | | |
| GSGE | 18/11/2023 | | | | | | | | | | | | | | |
| GTBE | 13/12/2023 | | | | | | | | | | | | | | |

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| | | guidelines for managing complaints and grievances involving internal and external stakeholders and specifies that any received complaint must be addressed within one month of its receipt. After the action has been taken, there is a commitment to obtain feedback on the effectiveness of the implemented measures within seven days. Operating units shall further enhance documentation practices, ensuring dates of all recorded complaints, actions taken in response, and acknowledgment of complainants. | |
| 4.2.3 | The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance - | It was observed that the compilation of complaints and grievances is sourced from various channels, including the complaint & grievance book, internal and external stakeholder meetings, social impact assessments, gender committee meetings, and workers union meetings. Interviews with sample of workers and stakeholders have confirmed that complaints lodged will be addressed within one month of receipt, and complainants will receive acknowledgment once the resolution of the complaint has been completed. | OFI |
| 4.2.4 | The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance - | Referring to Complaints and Grievances procedure, Doc. No.: SMP-GPB-19, Revision 4, dated 01/03/2020, under Clause 2.1.10, the complainant is entitled to opt for access to independent legal and technical advice. Furthermore, they have the choice to select individuals or groups to provide support or act as observers, and they also have the option of engaging a third-party mediator. | Complied |
| Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities. | | | |
| 4.3.1 | Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance - | It was verified that GAIOM and supply bases has demonstrated contributions to community development through consultations with internal stakeholder and local communities. 1. GKBE : Sponsoring Fasting Event with workers, 19/04/2023 | Complied |

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| | | <div>2. GAIOM: Contribution of 2 aircond set to SK Sri Maju Jaya, dated 15/11/2023.</div> <div>3. GSGE: Permission to PALAPES from UTHM to use estate compound for training program from 22/02 – 07/03/2024.</div> <div>4. GTBE: Financial aid contribution for Balai Polis Batang Melaka as per request letter dated 17/07/2023.</div> | | | | | | | | | | | |
|--|--|--|--------|-------------------|------|----|------|----|------|----|------|----|----------|
| Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent. | | | | | | | | | | | | | |
| 4.4.1 | <div>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</div> <div>- Critical (Major) compliance -</div> | <div>Reviewed and verified that all estates within GAIOM certification units have valid copies of land titles to prove legal ownership of its lands. Except Genting Ayer Item Oil Mill due to its location inside the land of Genting Sungei Rayat Estate under the land title# 96424; Lot No.: 227 and Lot No.: 228 for total 88.7 acres as seen in the tenancy agreement dated 22/12/2021 between Genting Plantations (WM) Sdn Bhd and Genting Oil Mill Sdn Bhd. The agreement valid since 01/01/2022 until 30/06/2024.</div> <div>Details of land title for estates as table below:</div> <table><tr><th>Estate</th><th>No of Land Titles</th></tr><tr><td>GKBE</td><td>28</td></tr><tr><td>GSRE</td><td>30</td></tr><tr><td>GSGE</td><td>36</td></tr><tr><td>GTBE</td><td>43</td></tr></table> | Estate | No of Land Titles | GKBE | 28 | GSRE | 30 | GSGE | 36 | GTBE | 43 | Complied |
| Estate | No of Land Titles | | | | | | | | | | | | |
| GKBE | 28 | | | | | | | | | | | | |
| GSRE | 30 | | | | | | | | | | | | |
| GSGE | 36 | | | | | | | | | | | | |
| GTBE | 43 | | | | | | | | | | | | |

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| 4.4.2 | Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include: | There are no customary rights within any of the estates under the certification unit, as all land belongs to Genting Plantations Berhad. This was confirmed through document reviews of the land titles and interviews with stakeholders, which indicated that no land disputes have been reported. | Complied |
| 4.4.2a | Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance - | There are no customary rights within any of the estates under the certification unit, as all land belongs to Genting Plantations Berhad. This was confirmed through document reviews of the land titles and interviews with stakeholders, which indicated that no land disputes have been reported | Complied |
| 4.4.2b | Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance - | There are no customary rights within any of the estates under the certification unit, as all land belongs to Genting Plantations Berhad. This was confirmed through document reviews of the land titles and interviews with stakeholders, which indicated that no land disputes have been reported. Consequently, there is no need for an agreement-making process or negotiated agreements detailing the Free, Prior and Informed Consent (FPIC) process, as such processes are unnecessary and not applicable. | Complied |
| 4.4.2c | Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance - | There are no customary rights within any of the estates under the certification unit, as all land belongs to Genting Plantations Berhad. This was confirmed through document reviews of the land titles and interviews with stakeholders, which indicated that no land disputes have been reported. Consequently, there is no need for an agreement-making process or negotiated agreements detailing the Free, Prior and Informed Consent (FPIC) process, as such processes are unnecessary and not applicable. | Complied |

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| 4.4.3 | <p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p> | <p>There are no customary rights within any of the estates under the certification unit, as all land belongs to Genting Plantations Berhad. This was confirmed through document reviews of the land titles and interviews with stakeholders, which indicated that no land disputes have been reported.</p> <p>The legal boundary for all estates visited was clearly demarcated with legal boundary stone.</p> | Complied |
| 4.4.4 | <p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p> | <p>There are no customary rights within any of the estates under the certification unit, as all land belongs to Genting Plantations Berhad. This was confirmed through document reviews of the land titles and interviews with stakeholders, which indicated that no land disputes have been reported. Consequently, there is no need for an agreement-making process or negotiated agreements detailing the Free, Prior and Informed Consent (FPIC) process, as such processes are unnecessary and not applicable.</p> | Complied |
| 4.4.5 | <p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p> | <p>There are no customary rights within any of the estates under the certification unit, as all land belongs to Genting Plantations Berhad. This was confirmed through document reviews of the land titles and interviews with stakeholders, which indicated that no land disputes have been reported. Consequently, there is no need for an agreement-making process or negotiated agreements detailing the Free, Prior and Informed Consent (FPIC) process, as such processes are unnecessary and not applicable.</p> | Complied |
| 4.4.6 | <p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p> | <p>There are no customary rights within any of the estates under the certification unit, as all land belongs to Genting Plantations Berhad. This was confirmed through document reviews of the land titles and interviews with stakeholders, which indicated that no land disputes have been reported. Consequently, there is no need for an agreement-making process or negotiated agreements detailing the</p> | Complied |

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| | | Free, Prior and Informed Consent (FPIC) process, as such processes are unnecessary and not applicable. | |
| Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions. | | | |
| 4.5.1 | (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance - | No new plantings have occurred in the estates under the certification unit since the last audit. Therefore, the Free, Prior and Informed Consent (FPIC) process should not be applicable in this context. It was confirmed that lands are leased from the state government, as confirmed by the ownership documents reviewed in indicator 4.4.1. | Complied |
| 4.5.2 | (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance - | No new plantings have occurred in the estates under the certification unit since the last audit. Therefore, the Free, Prior and Informed Consent (FPIC) process should not be applicable in this context. It was confirmed that lands are leased from the state government, as confirmed by the ownership documents reviewed in indicator 4.4.1. | Complied |
| 4.5.3 | Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance - | No new plantings have occurred in the estates under the certification unit since the last audit. Therefore, the Free, Prior and Informed Consent (FPIC) process should not be applicable in this context. It was confirmed that lands are leased from the state government, as confirmed by the ownership documents reviewed in indicator 4.4.1. | Complied |
| 4.5.4 | To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, | No new plantings have occurred in the estates under the certification unit since the last audit. Therefore, the Free, Prior and Informed Consent (FPIC) process should not be applicable in this | Complied |

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| | the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance - | context. It was confirmed that lands are leased from the state government, as confirmed by the ownership documents reviewed in indicator 4.4.1. | |
| 4.5.5 | Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance - | No new plantings have occurred in the estates under the certification unit since the last audit. Therefore, the Free, Prior and Informed Consent (FPIC) process should not be applicable in this context. It was confirmed that lands are leased from the state government, as confirmed by the ownership documents reviewed in indicator 4.4.1. | Complied |
| 4.5.6 | Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance - | No new plantings have occurred in the estates under the certification unit since the last audit. Therefore, the Free, Prior and Informed Consent (FPIC) process should not be applicable in this context. It was confirmed that lands are leased from the state government, as confirmed by the ownership documents reviewed in indicator 4.4.1. | Complied |
| 4.5.7 | New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance - | No new plantings have occurred in the estates under the certification unit since the last audit. Therefore, the Free, Prior and Informed Consent (FPIC) process should not be applicable in this context. It was confirmed that lands are leased from the state government, as confirmed by the ownership documents reviewed in indicator 4.4.1. | Complied |
| 4.5.8 | (C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance - | No new plantings have occurred in the estates under the certification unit since the last audit. Therefore, the Free, Prior and Informed Consent (FPIC) process should not be applicable in this context. It was confirmed that lands are leased from the state government, as confirmed by the ownership documents reviewed in indicator 4.4.1. | Complied |

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| Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. | | | |
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| 4.6.1 | (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance - | It was confirmed that lands are leased from the state government, as confirmed by the ownership documents reviewed in indicator 4.4.1. While during stakeholder consultation, there was no land dispute raised. On the other hand, GPB has formulated Procedure on Conflict Resolution and Handling of Negotiations and Compensation within Genting Plantation Berhad's Estates (Document No.: SMP-GPB-18, Revision 03 dated 29/12/2017) to handle any dispute issue including compensation method if any. | Complied |
| 4.6.2 | (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance - | Genting Plantation Berhad has formulated Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates (Document No.: SMP-GPB-18, Revision 03 dated 29/12/2017) to handle any dispute issue and compensation method if any. | Complied |
| 4.6.3 | Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance - | No smallholder scheme is involved within the certification unit. | Complied |
| 4.6.4 | The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance - | It was confirmed that lands are leased from the state government, as confirmed by the ownership documents reviewed in indicator 4.4.1. While during stakeholder consultation, there was no land dispute raised. On the other hand, GPB has formulated Procedure on Conflict Resolution and Handling of Negotiations and Compensation within Genting Plantation Berhad's Estates (Document No.: SMP-GPB-18, Revision 03 dated 29/12/2017) to handle any dispute issue including compensation method if any. | Complied |
| Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements. | | | |

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| 4.7.1 | <p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p> | It was confirmed that lands are leased from the state government, as confirmed by the ownership documents reviewed in indicator 4.4.1. While during stakeholder consultation, there was no land dispute raised. On the other hand, GPB has formulated Procedure on Conflict Resolution and Handling of Negotiations and Compensation within Genting Plantation Berhad's Estates (Document No.: SMP-GPB-18, Revision 03 dated 29/12/2017) to handle any dispute issue including compensation method if any. | Complied |
| 4.7.2 | <p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p> | It was confirmed that lands are leased from the state government, as confirmed by the ownership documents reviewed in indicator 4.4.1. While during stakeholder consultation, there was no land dispute raised. On the other hand, GPB has formulated Procedure on Conflict Resolution and Handling of Negotiations and Compensation within Genting Plantation Berhad's Estates (Document No.: SMP-GPB-18, Revision 03 dated 29/12/2017) to handle any dispute issue including compensation method if any. | Complied |
| 4.7.3 | <p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p> | Since the last audit, there have been no land acquisition involving communities' area. However, estate management has extended employment opportunities to local communities, as confirmed by the master list of employees. | Complied |
| <p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p> | | | |
| 4.8.1 | <p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p> | It was confirmed that lands are leased from the state government, as confirmed by the ownership documents reviewed in indicator 4.4.1. While during stakeholder consultation, there was no land dispute raised. On the other hand, GPB has formulated Procedure on Conflict Resolution and Handling of Negotiations and Compensation within Genting Plantation Berhad's Estates | Complied |

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| | | (Document No.: SMP-GPB-18, Revision 03 dated 29/12/2017) to handle any dispute issue including compensation method if any | |
| 4.8.2 | <p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p> | <p>There are no customary rights within any of the estates under the certification unit, as all land belongs to Genting Plantations Berhad. This was confirmed through document reviews of the land titles and interviews with stakeholders, which indicated that no land disputes have been reported.</p> <p>The legal boundary for all estates visited was clearly demarcated with legal boundary stone.</p> | Complied |
| 4.8.3 | <p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p> | <p>There are no customary rights within any of the estates under the certification unit, as all land belongs to Genting Plantations Berhad. This was confirmed through document reviews of the land titles and interviews with stakeholders, which indicated that no land disputes have been reported. Nevertheless, all estates within the certification unit have preserved all existing user right and confirmed with stakeholder consultation conducted.</p> | Complied |
| 4.8.4 | <p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p> | <p>All estates within the certification unit have preserved all existing user right and confirmed with stakeholder consultation conducted. On the other hand, GPB has formulated Procedure on Conflict Resolution and Handling of Negotiations and Compensation within Genting Plantation Berhad's Estates (Document No.: SMP-GPB-18, Revision 03 dated 29/12/2017) to handle any dispute issue including compensation method if any.</p> | Complied |
| Principle 5: Support smallholder inclusion | | | |
| Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses. | | | |
| 5.1.1 | <p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p> | <p>Sighted at the weight bridge the FFB Price posted. The prices paid for FFB was publicly available and updated weekly, however no</p> | Complied |

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| | | outside crop was send to GAIOM since it is certified as an RSPO IP mill. | |
| 5.1.2 | (C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance - | No smallholder and external surrounding estate supplying FFB to GAIOM and the mill is practicing Identity preserve module, therefore this criteria is not applicable. Stakeholder Meeting was conducted on 12/12/2023 at GTBE Club House. Attended by 33 representatives from various stakeholders. | Complied |
| 5.1.3 | (C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance - | No smallholder and external surrounding estate supplying FFB to GAIOM and the mill is practicing Identity preserve module, therefore this criteria is not applicable. | Complied |
| 5.1.4 | (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance - | No smallholder and external surrounding estate supplying FFB to GAIOM and the mill is practicing Identity preserve module, therefore this criteria is not applicable. | Complied |
| 5.1.5 | Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance - | No smallholder and external surrounding estate supplying FFB to GAIOM and the mill is practicing Identity preserve module, therefore this criteria is not applicable. | Complied |
| 5.1.6 | (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance - | No smallholder and external surrounding estate supplying FFB to GAIOM and the mill is practicing Identity preserve module, therefore this criteria is not applicable. | Complied |
| 5.1.7 | Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance - | No smallholder and external surrounding estate supplying FFB to GAIOM and the mill is practicing Identity preserve module, therefore this criteria is not applicable. Weighbridges are calibrated on a | Complied |

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| | | yearly basis to ensure accuracy. Weighbridge calibration certificates were available for verification as below. Weighbridge No. 1 Certificate Number: 054640; Serial Number: B521963089; 60,000 Kg x 10 Kg; Inspection Date: 08/06/2023. Weighbridge No. 2 Certificate Number: 056300; Serial Number: C046504178; Description: 80,000 Kg; Inspection Date: 28/07/2023. | |
| 5.1.8 | The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance - | No smallholder and external surrounding estate supplying FFB to GAIOM and the mill is practicing Identity preserve module, therefore this criteria is not applicable. | Complied |
| 5.1.9 | (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance - | No smallholder and external surrounding estate supplying FFB to GAIOM and the mill is practicing Identity preserve module, therefore this criteria is not applicable. However available a complaint and Grievance Procedure | Complied |
| Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains. | | | |
| 5.2.1 | The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance - | No smallholder and external surrounding estate supplying FFB to GAIOM and the mill is practicing Identity preserve module, therefore this criteria is not applicable. | Complied |
| 5.2.2 | The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance - | No smallholder and external surrounding estate supplying FFB to GAIOM and the mill is practicing Identity preserve module, therefore this criteria is not applicable. | Complied |

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| 5.2.3 | Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance - | No smallholder and external surrounding estate supplying FFB to GAIOM and the mill is practicing Identity preserve module, therefore this criteria is not applicable. | Complied |
| 5.2.4 | (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance - | No smallholder and external surrounding estate supplying FFB to GAIOM and the mill is practicing Identity preserve module, therefore this criteria is not applicable. | Complied |
| 5.2.5 | The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance - | No smallholder and external surrounding estate supplying FFB to GAIOM and the mill is practicing Identity preserve module, therefore this criteria is not applicable. | Complied |
| Principle 6: Respect workers' rights and conditions | | | |
| Criterion 6.1: Any form of discrimination is prohibited. | | | |
| 6.1.1 | (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance - | Genting Plantations Berhad has implemented a Social Policy dated 14/09/2020, signed by the President & Chief Operating Officer. According to this policy, the company commits to non-discrimination in various aspects such as hiring, compensation, access to training, promotion, termination, or retirement. Discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, union membership, or political affiliation is strictly prohibited. | Complied |
| 6.1.2 | (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance - | Based on interview with workers comprises of local and foreign workers, male and female workers confirmed that they were treated equally. It also confirmed that there is no discrimination in terms of salary payment via pay slip review, particularly for individuals performing similar job scopes. Additionally, it was established that no recruitment fees have been charged for new hires, ensuring a fair and transparent employment process within the company. | Complied |

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| 6.1.3 | <p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p> | <p>Procedure for Social Management, Doc. No. SMP-GPB-32, updated on 12/12/2023 established by GPB indicates that recruitment, hiring, promotion and selection of workers were based on performance, merit and skills, Interviews conducted with sampled workers from various genders and nationalities have confirmed that there is no discrimination based on ethnic origin, nationality, religion, disability, gender, sexual orientation, union membership, political affiliation, or age.</p> <p>There are no complaints regards to discrimination happened from the sample workers.</p> | Complied | | | | | | |
| 6.1.4 | <p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p> | <p>Interviewed with samples of female employees in all estates and mill confirmed that pregnancy testing is not conducted prior to work. They still will be able to offer for work if they are pregnant. A pre-medical check-up was administered by a Hospital Assistant to assess the worker's fitness for work. The urine test conducted only screened for drug and glucose levels. The commitment is mentioned in Procedure of Social Management, Clause 6.8.5 stating that certification unit shall not use pregnancy tests of the use of contraception as a condition of hiring or continued employment,</p> | Complied | | | | | | |
| 6.1.5 | <p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p> | <p>Each supply base has established appropriate gender committee as per Procedure of Social Management, Doc. No. SMP-GPB-32, updated on 12/12/2023. Details of meeting conducted by estates as table below:</p> <table><tr><td>Estate</td><td>Date of latest minute meeting</td></tr><tr><td>GKBE</td><td>18/12/2023</td></tr><tr><td>GSRE</td><td>12/12/2023</td></tr></table> | Estate | Date of latest minute meeting | GKBE | 18/12/2023 | GSRE | 12/12/2023 | Complied |
| Estate | Date of latest minute meeting | | | | | | | | |
| GKBE | 18/12/2023 | | | | | | | | |
| GSRE | 12/12/2023 | | | | | | | | |

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| | | <table><tr><td>GAIOM</td><td>15/12/2023</td></tr><tr><td>GSGE</td><td>13/12/2023</td></tr><tr><td>GTBE</td><td>18/12/2023</td></tr></table> <p>From the minute’s meetings, it can be concluded that the committee conducted every 6 months and discussing on awareness among female workers regarding to abuse and violence in the workplace, women’s rights, any issues in reproductive rights, welfare and child care facilities.</p> | GAIOM | 15/12/2023 | GSGE | 13/12/2023 | GTBE | 18/12/2023 | |
| GAIOM | 15/12/2023 | | | | | | | | |
| GSGE | 13/12/2023 | | | | | | | | |
| GTBE | 18/12/2023 | | | | | | | | |
| 6.1.6 | There is evidence of equal pay for the same work scope. - Minor compliance - | It was confirmed that all estates and mill were demonstrate equal pay for the same job roles. Workers across all units receive a base pay aligned with the minimum wages order of RM57.70 per day per person in 2023. While for piece-rate work, the documentation indicates fixed rates irrespective of gender and nationality but differ based on type and scope of job. Interview session with the workers confirmed the statement. | Complied | | | | | | |
| Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW). | | | | | | | | | |
| 6.2.1 | (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance - | A collective agreement between Genting Plantation Berhad and MAPA/NUPW has been formalized and documented in the document titled "MAPA/NUPW Field and other general employees and fringe benefits agreement, 2019." Additionally, each operating unit adheres to the Employment Act 1955 and the Minimum Wages Order, 2022. Payment documentation is provided through monthly pay slips issued to the workers. These pay slips include detailed information such as the worker's name, the month of payment, total wages for the month, overtime pay, paid public holidays, paid medical leave | Complied | | | | | | |

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| | | (if applicable), price bonus, overtime, paid annual leave, as well as statutory deductions like SOCSO (for all workers), EIS, and EPF (for local workers only), along with any other deductions, if applicable. | |
| 6.2.2 | <p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p> | <p>65 personal files were reviewed across all sampled supply bases. Sighted and verified that each personal file has critical information such as employee's registration card, employment contract in understandable language, copy of passport and work permit (foreign workers), copy of electronic pass, and application for extend employment contract. Employment contract highlighted the terms and conditions such as working hours, deduction, overtime, sick leave, holiday entitlement, reason of dismissal and period of notice were outlined in the contract.</p> <p>Payroll documents, namely the payslip, also give accurate information on compensation for all work done. This includes those who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay. Salary deductions and overtime were in accordance with the relevant laws (SOCSO, EPF, EIS) and Labour Office permits.</p> | Complied |
| 6.2.3 | <p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p> | <p>65 personal files were reviewed across all sampled supply bases. Sighted and verified that each personal file has critical information such as employee's registration card, copy of payslips, employment contract in understandable language, copy of passport and work permit (foreign workers), copy of electronic pass, and application for extend employment contract. Payroll documents, namely the payslip, also give accurate information on compensation for all work done. This includes those who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay. Reviewed payslip of sampled workers indicates compliance to regulations on working hours, overtime, annual leave</p> | Complied |

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| | | and permitted deductions such as SOCSO, EPF and SIP as well as non-statutory deductions such as unions fees and utility bills | |
| 6.2.4 | <p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p> | <p>In general, Genting Plantation Berhad offers free housing facilities to all workers, including contracted workers. The company subsidizes water and electricity for all workers residing in these accommodations. Additionally, workers who live outside the estate are provided with a housing allowance. The management oversees all housing units and is currently in the process of upgrading labor quarters by replacing old tiles and conducting painting work.</p> <p>Linesite inspection has been conducted weekly at all estates accordingly. In GKBE and GTBE, inspection was conducted by Healthcare Assistant (HA) and verified by Visiting Medical Officer (VMO). Sighted and verified linesite inspection at GKBE dated 03/02/2024, 09/02/2024 and 17/02/2024. While for GTBE, inspection was conducted on 05/02/2024, 12/02/2024 and 19/02/2024 respectively. Concerns regards to cleanliness, condition of drainage system, rubbish collection status, condition of bathroom and septic tank were highlighted.</p> <p>While at GAIOM, it was noted that water supply for worker quarters was sourcing from designated tube well and mill. Licence from SPAN, Doc No. LK/3/23/00803 valid from 27/02/2023 to 26/02/2026 for private water supply system and water analysis documents was reviewed. Water analysis was conducted every 6 months with external accredited laboratory on 09/05/2023 and 17/10/2023 and results are positive and safe to drink. Alternatively, GPB has scheduled for installation of facilities to directly received water supply from Ranhill SAJ Sdn Bhd since 2020 but due to COVID-19 pandemic, it has been pending ever since. In 2024, GPB has approach consultant to assist on installation of water supply facilities</p> | Complied |

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| | | from SAJ main water facility. Doc. No RZT/202228/MAZ/GSMSB/6370/MAM/07, dated 30/01/2024 was reviewed as evidence that the process of installation of the water facilities and its specifications has been proposed to Ranill SAJ Sdn Bhd | |
| 6.2.5 | The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance - | Interviewed with the workers informed that they have no issue to access to foods and goods. This is due to location of each estate which near to town and public transportation to go the town are available accordingly. There are also groceries shop established at each estate and monitoring of price is carried out by estate's management. Observation during visit at the shop shows that price was displayed. | Complied |
| 6.2.6 | <p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include</p> | <p>Genting Plantation Berhad's supply base has conduct assessment on actual average wage calculation of DLW benchmark calculation that considering of 10 type of expenses which are housing allowance, transport allowance, meals at work, food rations, transport-to and from work, child care, school for worker's children, healthcare, welfare and air ticket.</p> <p>GKBE has updated the assessment on 23/01/2022 and the details as below:</p> <ul style="list-style-type: none"> - Average take home pay per piece rated harvesters: RM 2,691.38 - Highest earned wage by harvester (average 12 months): RM 3,214.35 - Minimum earned wage by general workers (daily rated): RM 1,735.71 <p>While for GSRE, the details of the assessment as below:</p> <ul style="list-style-type: none"> - Average take home pay per piece rated harvesters: RM 2,646.99 | Complied |

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| | <p>other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage). The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p> | <p>- Highest earned wage by harvester (average 12 months): RM 3,159.96</p> <p>- Minimum earned wage by general workers (daily rated): RM 1,731.32</p> | |
| 6.2.7 | <p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p> | <p>According to the verification of the master list of workers, pay slips, employment contracts, and interviews with the workers, it has been established that all permanent workers at GAIOM and supply base performed core work. There is no recruitment of casual, temporary, or seasonal workers across all operating units. The estates have appointed contractor for FFB transporting and the workers of contractors are working permanently in for the contractors.</p> | Complied |

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| Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel. | | | | | | | | | | | |
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| 6.3.1 | <p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p> | <p>Genting Plantations Berhad has implemented Social policy dated 14/09/2020. This policy explicitly states that the management will uphold the rights of workers to join or establish legal trade unions of their own choice and to engage in collective bargaining.</p> <p>Website review and onsite visit observed the Policy is available on displayed and in understandable language at main notice boards at each supply bases. While interview with workers indicated that workers are well aware their right to join unions and verified a numbers of the workers already joined NUPW accordingly.</p> | Complied | | | | | | | | |
| 6.3.2 | <p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p> | <p>It was confirmed that there are workers who joined and actively involved in National United Plantation Workers (NUPW). Alternatively, it was affirmed that mill and estates has their own workers representative committee enable workers to voice out their concern. Any concerns were compiled by each representative of workers committee prior to meeting with estate management. Concern will delivered during the meeting and management will act accordingly. Details of latest meeting conducted for mill and estates as table below:</p> <table><tr><th>Estate</th><th>Date of latest minute meeting</th></tr><tr><td>GKBE</td><td>18/12/2023</td></tr><tr><td>GSRE</td><td>12/12/2023</td></tr><tr><td>GAIOM</td><td>26/01/2024</td></tr></table> | Estate | Date of latest minute meeting | GKBE | 18/12/2023 | GSRE | 12/12/2023 | GAIOM | 26/01/2024 | Complied |
| Estate | Date of latest minute meeting | | | | | | | | | | |
| GKBE | 18/12/2023 | | | | | | | | | | |
| GSRE | 12/12/2023 | | | | | | | | | | |
| GAIOM | 26/01/2024 | | | | | | | | | | |

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| | | GSGE | 29/12/2023 | | |
| | | GTBE | 18/12/2023 | | |
| 6.3.3 | Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance - | As per interview with the workers representative at mill and estate, it has been confirmed that, there is no interference by management to select representative. Workers will decide who will represent them for meeting with the management. | | | Complied |
| Criterion 6.4: Children are not employed or exploited. | | | | | |
| 6.4.1 | A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance - | Genting Plantations Berhad has instituted a Social Policy dated 14/09/2020 and a People Policy dated 03/08/2009, both of which emphasize the company's commitment to not engage in child labor. The rights of children are upheld and respected within the company's operations. While for appointed contractor, there is specific clause in contract agreement that prohibit contractor employed any minor. | | | Complied |
| 6.4.2 | (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance - | Reviewed the master list in each operating units and interview session with samples, found that no young person was employed. All the workers are above 18 years old. It has been further confirmed during the interview with the workers. Genting Ayer Item Palm Oil Mill and supply bases screened their workers' age using NRIC (for Malaysians) and passports (for non-Malaysians) in their personnel files. No individuals under 18 were found working during a site visit, showing compliance with age-related employment regulations. | | | Complied |
| 6.4.3 | (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance - | It was confirmed that via reviewing the master list in each operating units and interview session with samples, found that no young person was employed. | | | Complied |

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| 6.4.4 | <p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p> | <p>Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired. Briefing on social policies has been conducted regularly which includes contractor as below:</p> <table><tr><th>Estate</th><th>Date</th></tr><tr><td>GKBE</td><td>05/09/2023</td></tr><tr><td>GAJOM</td><td>20//12/2023</td></tr><tr><td>GSRE</td><td>30/11/2023</td></tr><tr><td>GSGE</td><td>18/11/2023</td></tr><tr><td>GTBE</td><td>13/12/2023</td></tr></table> | Estate | Date | GKBE | 05/09/2023 | GAJOM | 20//12/2023 | GSRE | 30/11/2023 | GSGE | 18/11/2023 | GTBE | 13/12/2023 | Complied |
|--|--|---|--------|------|------|------------|----------|-------------|------|------------|------|------------|------|------------|----------|
| Estate | Date | | | | | | | | | | | | | | |
| GKBE | 05/09/2023 | | | | | | | | | | | | | | |
| GAJOM | 20//12/2023 | | | | | | | | | | | | | | |
| GSRE | 30/11/2023 | | | | | | | | | | | | | | |
| GSGE | 18/11/2023 | | | | | | | | | | | | | | |
| GTBE | 13/12/2023 | | | | | | | | | | | | | | |
| Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected. | | | | | | | | | | | | | | | |
| 6.5.1 | <p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p> | <p>Genting Plantations Berhad has instituted a Social Policy dated 14/09/2020 and a People Policy dated 03/08/2009, both of which emphasize the company's commitment to prohibit any physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation. Additionally, Sexual Harassment Policy dated 03/08/2009 was established to guarantee a workplace free from harassment and to prevent any conduct that could foster an environment of hostility or intimidation.</p> <p>Communication of the policy has been conducted during internal stakeholder meetings, gender committee meeting and workers committee meetings. For internal stakeholder meeting, the details as table below:</p> <table><tr><th>Estate</th><th>Date</th></tr><tr><td>GKBE</td><td>08/01/2024</td></tr></table> | Estate | Date | GKBE | 08/01/2024 | Complied | | | | | | | | |
| Estate | Date | | | | | | | | | | | | | | |
| GKBE | 08/01/2024 | | | | | | | | | | | | | | |

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| | | <table><tr><td>GAIOM</td><td>03/10/2023</td></tr><tr><td>GSRE</td><td>11/07/2023</td></tr><tr><td>GSGE</td><td>20/11/2023</td></tr><tr><td>GTBE</td><td>24/07/2023</td></tr></table> | GAIOM | 03/10/2023 | GSRE | 11/07/2023 | GSGE | 20/11/2023 | GTBE | 24/07/2023 | | | | | |
| GAIOM | 03/10/2023 | | | | | | | | | | | | | | |
| GSRE | 11/07/2023 | | | | | | | | | | | | | | |
| GSGE | 20/11/2023 | | | | | | | | | | | | | | |
| GTBE | 24/07/2023 | | | | | | | | | | | | | | |
| 6.5.2 | <p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p> | <p>GAIOM and supply bases adopted Social Policy dated 14/09/2020 and a People Policy dated 03/08/2009, both of which emphasize the company's commitment to protect reproductive rights of all, especially for women in operations.</p> <p>Communication of the policy has been taking place during the internal stakeholder meeting which details as table below:</p> <table><tr><td>Estate</td><td>Date</td></tr><tr><td>GKBE</td><td>08/01/2024</td></tr><tr><td>GAIOM</td><td>03/10/2023</td></tr><tr><td>GSRE</td><td>11/07/2023</td></tr><tr><td>GSGE</td><td>20/11/2023</td></tr><tr><td>GTBE</td><td>24/07/2023</td></tr></table> | Estate | Date | GKBE | 08/01/2024 | GAIOM | 03/10/2023 | GSRE | 11/07/2023 | GSGE | 20/11/2023 | GTBE | 24/07/2023 | Complied |
| Estate | Date | | | | | | | | | | | | | | |
| GKBE | 08/01/2024 | | | | | | | | | | | | | | |
| GAIOM | 03/10/2023 | | | | | | | | | | | | | | |
| GSRE | 11/07/2023 | | | | | | | | | | | | | | |
| GSGE | 20/11/2023 | | | | | | | | | | | | | | |
| GTBE | 24/07/2023 | | | | | | | | | | | | | | |
| 6.5.3 | <p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p> | <p>There was no new mother found in Genting Kulai Besar Estate, Genting Ayer Item Oil Mill, and Genting Sri Gading Estate, Therefore, no assessment of new mother needs has carried out. However, assessment of new mother was reviewed at Genting Sungei Rayat Estate on 16/02/2024 who due date of delivery in April 2024. While in Genting Tebong Besar Estate, sighted new mother assessment records available on 05/12/2023 and 30/11/2023 for its two new mothers. The assessment was generally conducted before the due date to identify needs such as private breast pumping area</p> | Complied | | | | | | | | | | | | |

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| | | within work area, time off to send babies to clinic for periodical check-up and facilities to store pumped milk. Interview with the new mothers evident that all needs were fulfilled by the company. | |
| 6.5.4 | A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance - | Genting Plantations Berhad has established a Procedure on Prevention and Eradication of Sexual Harassment at the Workplace (Doc. No. SMP-GPB-20, Revision 0 dated 11/10/2013), which includes the establishment of a grievance mechanism. The procedure respects anonymity and protects complainants when requested especially for sensitive issues regarding on sexual concerns. Interview session with gender committee and female workers confirmed that they are aware and understand on the SOPs and mechanism. | Complied |
| Criterion 6.6: No forms of forced or trafficked labour are used. | | | |
| 6.6.1 | (C) All workers have entered into employment voluntarily and the following are prohibited: <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages - Critical (Major) compliance - | With regards on documents review such as employment agreement, payslip, passport, works permits, agreement between recruitment agency with headquarters, agreement with contractors, overtime forms and approval as well as interview session with samples of workers, it can conclude that: <ul style="list-style-type: none"> - Retention of documents: Workers can keep their passports freely, and the company only holds them when needed for renewal. - Charging of recruitment fee: Workers are not charged any recruitment fees. Workers employed by the certification unit are directly hired with no recruitment agents as intermediaries. - Involuntary overtime: Based on interviews conducted with the workers, all overtime work were carried out on a voluntary basis. Workers are free to decline any offers for overtime work. - Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. | Complied |

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| | | <ul style="list-style-type: none"> - Debt bondage: There is no evidence of any incidence of debt bondage. - Withholding of wages: There is no evidence of withholding of wages. - Contract substitution: There was no evidence of contract substitution. All workers were directly hired and knew what type of job they would be doing prior to signing their contracts. Interview with the workers confirmed the statement. | |
| 6.6.2 | (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented. - Critical (Major) compliance - | Genting Plantation Berhad have implemented a Social Policy dated 14/09/2020 and a People Policy dated 03/08/2009. Additionally, Procedures for Social Management, Doc. No. SMPGPB-32, Revision 03 dated 12/12/2023 have been developed and put into effect. These procedures ensure that migrant workers are provided with safe living conditions and receive post-arrival orientation on employment conditions, safety and health protocols, sustainability practices, as well as relevant laws and regulations. Furthermore, the company strictly prohibits discrimination, recruitment fees, and contract substitution. | Complied |
| Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health. | | | |
| 6.7.1 | (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded. - Critical (Major) compliance - | GKBE Available Organization Chart of Safety and Health Committee where the Estate Manager is the Chairman of SHC Committee. Meeting was regularly conducted and 4 time a year (quarterly) as minutes of meeting sampled that discussed OSH issues. Chairman of SHC (Mill Manager GAIOM) was appointed by Choo Huan Boon as Appointment Letter dated 01/12/2017. Organization Chart for SHC dated 16/01/2024 where Chairman id Mill Manager (Muhammad Azim b. Bani Amin), Secretary is Muhammad Izwan Mohamed Manshawi) Mill Engineer/OSH-C, 6 employers Representatives, 6 Employees Representatives. Meeting of SHC was | Complied |

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| | | <p>conducted regularly as required minimum quarterly in a year. It was conducted on 30/01/2024, 20/11/2023, 24/08/2023, 24/08/2023, 19/06/2023, 19/04/2023, 25/01/2023. OSH issues were discussed and decided in the meeting as stated in the minutes.</p> <p>GSGE</p> <p>Appoint Letter of SHC members among workers (Ku Azba Arish, Nurfatin Syarina, Muhamad Akmal Izzat (dated 01/07/2023), Syafawi, Ng Cheng Huat, Mohmammad Ziaur Rahman(01/01/2017) and others. Meeting of SHC was conducted on 22/12/2023, 25/09/2023, 27/06/2023, 28/03/2023. OSH Issues included accident cases reported were discussed as stated in the minutes.</p> <p>GTBE</p> <p>Minutes of Meeting of SHC was sighted as conducted regularly in year 2023. Conducted on 29/12/2023, 08/09/2023, 08/06/2023, 08/03/2023.</p> | |
| 6.7.2 | <p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p> | <p>First Aid Box inspection by HA conducted once a month for 12 units issued to mandores and departmental used in GKBE on 01/02/2024, 02/01/2024, 03/12/2023</p> <p>GAIOM</p> <p>NADOPOD Procedure (SP-MGR-06) Rev.02, dated 20/02/2011 was established and documented. The procedure explained process for accident reporting, investigation. 20 workers listed in attendance of BOFA-C by Certified Emergency Response Training Academy conducted on 19-20/12/2022. Sampled First aid boxes in Workshop found properly maintained.</p> | Complied |
| 6.7.3 | <p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine</p> | <p>GKBE, GTME, GSGE sampled among Harvesters, Chemical handlers (sprayers and tractor drivers), Manurer during site visit found used PPEs issue and in good working conditions, fit and provided FOC.</p> | Complied |

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| | <p>operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p> | <p>Available and maintain records of PPEs distribution as sampled in all estate.</p> <p>Noise Risk Assessment was conducted on Allied Chemist by Assessor Amirul Hakim (HQ/16/PEB/00/155) on 26/04/2021. Personnel monitoring was conducted:</p> <p>Lasiman (Workshop) NEL (90 dBA)</p> <p>Md. Kurshed (Tractor Grabber) NEL 89.2 dBA</p> <p>Udayakumar (Tractor Roto Slash) NEL 90.2 dBA</p> <p>Ramamorthy (JCB Excavator) NEL 84.8 dBA</p> <p>All above employees provided with ear plugs/nuff for protection from noise.</p> | |
| 6.7.4 | <p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p> | <p>Sighted coverage and contribution made to SOCSO for medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law:</p> <p>GKBE</p> <p>December 2023: 169 workers, RM 6,107.70</p> <p>June 2023: 154 workers, RM 4,938.20</p> <p>January 2023: 161 workers, RM 4,312.20</p> <p>GAIOM</p> <p>Contribution as sighted in Form 8A for coverage of SOCSO as below:</p> <p>January 2023: 77 Workers, RM 3,0187.70</p> <p>Mei 2023: 77 Workers, RM 3,280.30</p> <p>November 2023: 81 Workers, 3,906.80</p> <p>GSRE has made a contribution to SOCSO as records sampled in Form 8A below:</p> <p>January 2024: 127 Workers, RM 3,913.90</p> | Complied |

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| | | <p>October 2023: 132 Workers, RM 4,432.30 July 2023: 115 Workers, RM 4,008.30. GSGE Monthly contribution made using Form 8A to SOCSO as below: November 2023: 173 Workers, RM 5,650.50 May 2023: 167 Workers, RM 5,537.60 GTBE Monthly contribution using Form 8A to SOCSO as below: November 2023: 251 Workers. RM 7,994.10 June 2023: 248 Workers, RM 7,899.10 May 2023: 244 Workers, RM 7,857.20</p> | |
| 6.7.5 | <p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -</p> | <p>In GKBE Sighted Accident involving: Hamadi (Indonesian Harvester) accident on 29/08/2023 at Block 11B, causing soft tissue injury (Elbow joint left) 5 days MC. Hendri Saputra (Indonesia Harvester) accident on 10/12/2023 at Block 11 BX (KBN) left knee cuts by parang and received 6 day MC. Hutharsanan Mahadgran accident on 04/07/2023 at Block 18 B, causing Left elbow infection. Received 24 days MC. JKKP 8 was submitted to DOSH on 18/01/2024 and all above cases were correctly reported. GAIOM Accident was reported (JKKP 6) date occurred on 10/02/2023 involving Muhammad Hisyamuddin Mahat Technician). Doing maintenance of ESP Vibrator No. 2. Stepped on conveyor cover and left leg dropped in the conveyor. Accident Investigation Report was raised accordingly. Investigation was conducted on 11/02/2023.</p> | Complied |

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| | | <p>SHC Meeting was conducted on 11/02/2023 as minutes of Meeting sighted.</p> <p>GSGE</p> <p>Form JKPP 8 was submitted and notified to DOSH on 31/01/2024. Stated number of MC only 6 days and not tally with records below. Year 2023 Accident statistic and records was maintained. Monthly statistics approved by Estate Manager as below:</p> <table><tr><th>Date</th><th>worker</th><th>Summary of Accident</th><th>Work Unit</th><th>MC</th></tr><tr><td>26/04</td><td>Shofikul Islam</td><td>Thorn prick at below eyelids</td><td>Manuring</td><td>3</td></tr><tr><td>19/05</td><td>Rafiq Ahmad</td><td>Chemical splash over both eye</td><td>Sprayer</td><td>1</td></tr><tr><td>26/05</td><td>Samain</td><td>Thorn prick over right knee</td><td>Harvester</td><td>2</td></tr><tr><td>19/06</td><td>Iman Holid</td><td>Chemical splash over right eye</td><td>Sprayer</td><td>0</td></tr><tr><td>28/06</td><td>Halil</td><td>Palm fronds fall over head</td><td>Harvester</td><td>3</td></tr></table> <p>GTBE</p> <p>Form JKPP 8 was notified and submitted to JKPP on 15/01/2024 for statistic of accident, occupational disease and poisoning in 2023. Zero accident and loss on mandays due to accident reported in 2023.</p> | Date | worker | Summary of Accident | Work Unit | MC | 26/04 | Shofikul Islam | Thorn prick at below eyelids | Manuring | 3 | 19/05 | Rafiq Ahmad | Chemical splash over both eye | Sprayer | 1 | 26/05 | Samain | Thorn prick over right knee | Harvester | 2 | 19/06 | Iman Holid | Chemical splash over right eye | Sprayer | 0 | 28/06 | Halil | Palm fronds fall over head | Harvester | 3 | |
|--|----------------|--|-----------|--------|---------------------|-----------|----|-------|----------------|------------------------------|----------|---|-------|-------------|-------------------------------|---------|---|-------|--------|-----------------------------|-----------|---|-------|------------|--------------------------------|---------|---|-------|-------|----------------------------|-----------|---|--|
| Date | worker | Summary of Accident | Work Unit | MC | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26/04 | Shofikul Islam | Thorn prick at below eyelids | Manuring | 3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| 28/06 | Halil | Palm fronds fall over head | Harvester | 3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Principle 7: Protect, conserve and enhance ecosystems and the environment | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| 7.1.1 | <p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p> | <p>IPM Plan FY 2024 was established and documented in GKBE and GSRE. Among in the programme included:</p> <ul style="list-style-type: none"> • Increase barn owl box ratio but according to Oil Palm Manual. • Increase barn owl population: <ul style="list-style-type: none"> - Implement 1st and 2nd generation bait – Butik S - Stop completely usage of 3rd generation bait – Storm etc. - Increase planting area for beneficial plant - Grass Cutting / Rotor slasher (Integrated Weed management) <p>In GSGE IPM Management Plan dated 16/02/2024 established and monitored.</p> <table border="1" data-bbox="1137 758 1930 1390"> <thead> <tr> <th>Category</th><th>Action Plan</th><th>Status</th><th>Dateline</th></tr> </thead> <tbody> <tr> <td>Biological control:</td><td>Barn Owl Ratio Increase Phase 1 (1:30) Phase 2 (1:20) Phase 3 (1:10) Current Ratio (1:12)</td><td>On-going</td><td>Dec 2024</td></tr> <tr> <td>Chemical Control</td><td>Maintain Barn owl population <ul style="list-style-type: none"> • Implement 1st generation bait-Racumen, Butik S • Stop completely usage of 3rd Generation bait-Storm etc </td><td>Done</td><td>Complete</td></tr> <tr> <td>Biological Plant</td><td>Set up beneficial plant nursery</td><td>Done On-going</td><td>Complete Dec 2024</td></tr> </tbody> </table> | Category | Action Plan | Status | Dateline | Biological control: | Barn Owl Ratio Increase Phase 1 (1:30) Phase 2 (1:20) Phase 3 (1:10) Current Ratio (1:12) | On-going | Dec 2024 | Chemical Control | Maintain Barn owl population <ul style="list-style-type: none"> • Implement 1st generation bait-Racumen, Butik S • Stop completely usage of 3rd Generation bait-Storm etc | Done | Complete | Biological Plant | Set up beneficial plant nursery | Done On-going | Complete Dec 2024 | Complied |
|---------------------|--|--|----------------------|-------------|--------|----------|---------------------|---|----------|----------|------------------|--|------|----------|------------------|---------------------------------|------------------|----------------------|----------|
| Category | Action Plan | Status | Dateline | | | | | | | | | | | | | | | | |
| Biological control: | Barn Owl Ratio Increase Phase 1 (1:30) Phase 2 (1:20) Phase 3 (1:10) Current Ratio (1:12) | On-going | Dec 2024 | | | | | | | | | | | | | | | | |
| Chemical Control | Maintain Barn owl population <ul style="list-style-type: none"> • Implement 1st generation bait-Racumen, Butik S • Stop completely usage of 3rd Generation bait-Storm etc | Done | Complete | | | | | | | | | | | | | | | | |
| Biological Plant | Set up beneficial plant nursery | Done On-going | Complete Dec 2024 | | | | | | | | | | | | | | | | |

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| | | <table><tr><td></td><td>Increase beneficial plant planting (Tunera subulate, Tunera ulmifobia, Antigonan leptopus, Cassia cobanensis.</td><td></td><td></td></tr></table> IPM Plan dated 15/01/2024 was sighted in GTBE which having almost similar programme as in the above table. | | Increase beneficial plant planting (Tunera subulate, Tunera ulmifobia, Antigonan leptopus, Cassia cobanensis. | | | |
| | Increase beneficial plant planting (Tunera subulate, Tunera ulmifobia, Antigonan leptopus, Cassia cobanensis. | | | | | | |
| 7.1.2 | Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance - | None of species referenced in the Global Invasive Species Database and CABI.org are used for the management of IPM in the estates visited. The estates have declared this compliance in the status of IPM species invasiveness. | | Complied | | | |
| 7.1.3 | There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance - | Genting Plantations has a policy of no open burning. As advocated, the estates practiced zero burning. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal. | | Complied | | | |
| Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment. | | | | | | | |
| 7.2.1 | (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance - | As sampled in Estates of Genting Plantations (GKBE, GSRE, GSGE), a Sustainability Management procedure Manual under section SOPs and Justification of Pesticides Used (SMP-GPB-28), rev 7 dated June 2022. The SOP addressed on <ul style="list-style-type: none">• Procedures on pesticides usage• Type of pesticides• Para 7.0 Justification for all pesticides Used that mentioned refer to Table that contains:<ul style="list-style-type: none">a) Crop stageb) Application Typec) Pesticide Name | | Complied | | | |

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| | | d) Active Ingredient e) Class (by Pesticide Malaysia) f) WHO class g) Target Weed/Pest | |
| 7.2.2 | (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - Critical (Major) compliance - | Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i applied per ha and number of applications) dated 15/01/2024 had been maintained and kept by the sampled estates. This was established in all estates of Genting Plantation. Among details sampled in: GSGE | Complied |
| 7.2.3 | (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance - | The quantity of agrochemicals required for various field conditions are documented and justified in Sustainability Management procedure Manual under section SOPs and Justification of Pesticides Used. Refer document no. SMP-GPB-28, rev 8 dated 11/01/2023. The implementation in the field is consistent with the SOP established. Currently no Class IA and IB and II types of pesticides used an all estates visited and stock card sampled in all Chemicals Store. | Complied |
| 7.2.4 | There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance - | No prophylactic use of pesticide was identified in the estates. This was verified in all estate and chemicals store visited. | Complied |
| 7.2.5 | Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: | Based on the sampled estates' Chemical Register using OSHA regulated format, there were only class II, III & IV chemicals used by the estates. There were no pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, used. Control | Complied |

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| | <p>a) Judgment of the threat and verify why this is a major threat</p> <p>b) Why there is no other alternative which can be used</p> <p>c) Which process was applied to verify why there is no other less hazardous alternative</p> <p>d) What is the process to limit the negative impacts of the application</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p> | <p>of leaf-eating pest such as bagworms was done using Class IV Acephate.</p> <p>As in Pesticides Usage Monitoring Record from 2016-2023 found mentioned Use of Paraquat has been stop. As recorded since 2019 no such usage in all estates (GKBE, GSRE, GSGE).</p> | |
| 7.2.6 | <p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p> | <p>Trainings on safe handling of chemical and right method of spraying were given to the relevant employees which include the storekeeper, pre-mixers, and herbicides sprayers. This is also in-line with the recommendation by the CHRA assessor. Various methods of training such as briefing, practical training and on-the-job supervisions were used to ensure effective delivery of knowledge. Records of training were well maintained for verification at all the sampled estates.</p> <p>GSGE has a record of training foe PPE and Spraying conducted on 07/09/2023 and attended by 10 workers as stated in attendance. The chemicals management, including spraying SOP explained that also considered mixing, storage and roles and responsibility.</p> | Complied |
| 7.2.7 | <p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p> | <p>Pesticides were found stored in all estates' Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. Hazard signage and signage requiring the wearing of PPE were visibly displayed. The stores were also equipped with:</p> <ul style="list-style-type: none"> • Ventilation fans • Containment/bunding • SDS (reviewed all maintain within 5 years as sampled) | Complied |

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| | | <ul style="list-style-type: none"> • Spill kits • Emergency shower/Eye wash facilities. • Labelling and signages • Stock Cards <p>Fire Extinguishers/First aid boxes.</p> | |
| 7.2.8 | <p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p> | <p>Excess chemical containers that were not used for containing premixed chemicals have been triple rinsed and punctured and safely stored to prevent misuse. The containers will then be collected by any authorised vendors and records of disposal were maintained.</p> | Complied |
| 7.2.9 | <p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p> | <p>Aerial of pesticides was not practiced by any of the sampled estates.</p> | Complied |
| 7.2.10 | <p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p> | <p>CHRA was conducted on 17/03/2022-11/05/2022 by Hjh Aisyah & Hajh Noormahani Harun (JKKP/HQ/12/ASS/00/309 & HQ/03/ASS/00/154). Under 6.4 Necessity for Medical Surveillance. Use of Organophosphates. Acephate is classified as organophosphate but GKBE not using it now. Then Medical Surveillance found not recommended.</p> <p>In GSGE found Medical Surveillance was conducted for conducted for workers exposed to pesticides.</p> <p>Copy of Report of Medical Surveillance available (Certificate of Fitness): Muhamad Shahrizan Salleh. Examination Test Result: FBC/Renal+ Liver Functions, Spirometry Test (Fit) and Hendra. Examination Test Result: FBC/Renal+ Liver Functions Spirometry Test (Fit)</p> | Complied |

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| 7.2.11 | <p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p> | Based on site observation and verification of employee master list, there is no evidence that work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions. No ladies Sprayers in all estates as sampled. | Complied |
| Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner. | | | |
| 7.3.1 | <p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p> | <p>The Waste Management Plan (for Estates and Mills) has been established by Genting Ayer Item Certification Unit. The document states the monitoring and Action plan of managing all waste generated in the mill and estate, including methods of disposal and its legal requirements associated to the type of waste.</p> <p>Waste was classified into Scheduled Waste, Domestic Waste and Recyclable Waste. Scheduled Waste were disposed via licensed SW Contractors under DOE after being stored at the units SW store respectively. Scheduled Waste from line site is also identified and segregated to ensure they are not disposed as domestic waste. The certification units have places recyclable containers (plastic, paper and glass) around the housing compounds with regular awareness being conducted for the workers to promote recycling.</p> | Complied |
| 7.3.2 | <p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p> | <p>Genting Plantations Berhad have established procedures for proper disposal of generated waste materials which was available in Sustainability Management Procedure Manual; Scheduled Waste Management; SMP-GPB- 11, Rev. 02, dated 11/08/2020, Sustainability Management Procedure Manual; Landfill and Domestic Waste Management Plan; SMP-GPB-12, Rev. 01, dated 01/12/2014 and Sustainability Management Procedure Manual; Recyclable Waste Management; SMP-GPB-13, Rev. 00, dated 11/10/2023</p> <p><u>Genting Ayer Item Oil Mill</u></p> | Complied |

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| | | <p>1. Scheduled Waste were identified and stored in the mill's scheduled waste stored in accordance with SW Regulations 2005. The waste is stored less than 180 days and disposed via licensed contractors. Consignment notes of latest disposed SW were verified as below:</p> <p>a. SW409 – Contaminated Chemical Container; Consignment Note Number: 20240130115QKW28; Date: 30/01/2024; Quantity: 0.3915; Facility: Southern Strength (M) Sdn Bhd.</p> <p>b. SW305 – Spent Engine Oil; Consignment Note Number: 2024013011GSV51E; Date: 30/01/2024; Quantity: 1.039; Facility: Southern Strength (M) Sdn Bhd.</p> <p>c. SW322 – Waste of Water Chemical Testing; Consignment Note Number: 2024013011569RDO; Date: 31/01/2024; Quantity: 0.1114; Facility: Southern Strength (M) Sdn Bhd.</p> <p>d. SW410 – Contaminated Cotton rag, Plastic & Filter; Consignment Note Number: 2024013011JVPX73; Date: 31/01/2023; Quantity: 0.4689; Facility: Southern Strength (M) Sdn Bhd.</p> <p>2. Domestic wastes were disposed via 3rd party contractor, Foo Chen Enterprise where the contractor has placed 2 units on bins at the housing complex. The domestic and household waste is filled into the bin and the contractor removes the bins twice a week to be disposed to the government waste disposal centres.</p> <p><u>Genting Sungei Rayat Estate</u></p> <p>1. Scheduled Waste were identified and stored in the estates' scheduled waste store in accordance with SW Regulations 2005. The waste is stored less than 180 days and disposed via licensed</p> | |
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| | | <p>contractors. Consignment notes of latest disposed SW were verified as below:</p> <p>a. SW306 – Spent Hydraulic Oil; Consignment Note Number: 2024020710JA1MOH; Date: 30/01/2024; Quantity: 0.0191; Facility: Southern Strength (M) Sdn Bhd.</p> <p>b. SW410 – Spent contaminated oil filters, rags etc; Consignment Note Number: 20240207108WY574; Date: 30/01/2024; Quantity: 0.0428; Facility: Southern Strength (M) Sdn Bhd.</p> <p>Domestic wastes were disposed at the landfill in the estate and for some of the estates through 3rd party contractor. The landfill was visited and found to be far from the housing complex and watercourses. The domestic and household waste is filled into the bin and the contractor removes the bins twice a week to be disposed to the government waste disposal centres. There was no evidence of any scheduled waste disposed via the landfill as well.</p> | |
| 7.3.3 | <p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p> | <p>Verification and interview with employees at the estate have concluded that there was no use of fire in wastes disposal. Domestic and household wastes were disposed via landfill and based on the site visit to the estate's landfill, it was observed that all domestic waste were sent to the landfill and buried.</p> | Complied |
| Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield. | | | |
| 7.4.1 | <p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p> | <p>Managing soil fertility to optimise yield and minimise environmental impact is addressed in Oil Palm Manual: Manuring of Oil Palm. Among the topics covered in the manual are:</p> <ul style="list-style-type: none"> • Nursery manuring • Field Manuring • Application of Fertiliser | Complied |

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| | | <ul style="list-style-type: none"> Fertiliser delivery and Stock Reports for estates Fertiliser sampling for analysis Manuring Schedule Method of application for younger and mature palms Apart from that other relevant procedures are also adhered such as: <ul style="list-style-type: none"> Soil conservation and terracing Riparian Buffer Zone Management (SMP-GPB-14) | | | | | | | | | |
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| 7.4.2 | <p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p> | <p>Soils of Genting Sungei Rayat Estate (GSRE) dated July 2021 by Param Agriculture Soil Surveys in Mukim Linau and Tanjung Sembrong, Batu Pahat. The purpose of the study is to produce semi-details soil map of estates with a view of grouping of soils into management group for oil palm cultivation and improve practices.</p> <p>Genting Plantation Research Centre (GPRC) prepare the annual fertilizer recommendation base leaf analysis result. Leaf analysis which is showing the nutrient status was used as a guidance to establish the recommendation.</p> <p>In GSRE, GSRE, a Soils Survey and Assessment Report for Mukim Estates in Batu Pahat dated July 2021 by Param Agriculture Soil Surveys (M) Sdn Bhd was sighted. Proposed to produced semi details soils map for the estates for oil palm cultivation and highlight problems if any.</p> | Complied | | | | | | | | |
| 7.4.3 | <p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p> | <p>Summary of EFB for Month of January was sampled. Available record of monthly transportation of FFB from GAIOM to estate among sampled November and December 2023 and January 2025. Application was sampled for month of January below:</p> <table border="1"> <thead> <tr> <th>Field</th><th>Contractor Applied</th><th>Estate Applied</th><th>Total (MT)</th></tr> </thead> <tbody> <tr> <td></td><td></td><td></td><td></td></tr> </tbody> </table> | Field | Contractor Applied | Estate Applied | Total (MT) | | | | | Complied |
| Field | Contractor Applied | Estate Applied | Total (MT) | | | | | | | | |
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Criterion 7.5: Practices minimise and control erosion and degradation of soils.

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| 7.5.1 | <p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p> | <p>As sampled in GKBE, the Soil Map was sighted from Department of Agriculture (DOA), dated 04/02/2019. The soil classes for the estate were:</p> <ul style="list-style-type: none"> • Steepland (2.58 Ha/0.15%), • Segamat/Katong (670.24 Ha/39.64%) and • Rengam - Jerangau (1018.22 Ha/60.21%). <p>IN GSBE available a Soil Map dated 08/01/2018 By DOA where the soil class as mentioned:</p> <ul style="list-style-type: none"> • Rengam - Jerangau (1,769.79 Ha/53.28 %) • Sedu Parit Botak-Linau (1,290.85 Ha/38.86%) • Holyrood-Lunas (261,09 Ha/7.86%) <p>In GTBE available a Soils Map comprised of all division (Cempedak, Cheng, Kelemak, Repah, See Kee, Main Division.</p> | Complied |
| 7.5.2 | <p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p> | <p>In Genting Plantation Estates (GKBE, GSRE and GTBE) no replanting on steep slopes (above 25 Degree).</p> | Complied |
| 7.5.3 | <p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p> | <p>As verified and estates site visit conducted found no new planting of oil palm in Genting Plantation Ayer Item Certification Unit Estates.</p> | Complied |
| <p>Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p> | | | |
| 7.6.1 | <p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p> | <p>In GSRE found Soils Map established as GIS processed dated 16/04/2020.</p> <p>Soil classes: Sedu-Parit Botak-Linau (649.48 Ha/62.61%)</p> <p>Soil classes: Briah (217.20 Ha/20.94 %)</p> | Complied |

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| | | <p>Briah-Sedu-Transition (170.66 Ha/16.45%) and visit in Sing Mah Division found the Soils Map data dated GIS Processed on 16/04/2020. Soil classes: Peat (338.03 Ha/52.96%) Soil classes: Mineral Soil (300.22 Ha/47.04%) While Slope Map dated 01/10/2013 for GSME as data recorded below: 0-6 Degree: Flat (638.64 Ha/99.37%) 6-10 Degree: Undulating (4.06 Ha/0.63%) 10-15 Degree: Rolling (-) 15-20 Degree: Hilly (-) 20-25 Degree: Steep (-) >25 Degree: Very Steep (-) In Sampled in Main Division of GTBE found a Slope Map dated 24/06/2013 as below information: 0-6 Degree: Flat (1,405.99 Ha/89.53%) 6-10 Degree: Undulating (130.21 Ha/8.29%) 10-15 Degree: Rolling (27.43 Ha/1.75%) 15-20 Degree: Hilly (1.82 Ha/0.12%) >25 Degree: Very Steep (0.00 Ha/0.00%). Other Divisions also having Slope Maps as verified.</p> | |
| 7.6.2 | <p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -</p> | <p>Except in Sing Mah Division where a peat land recorded other divisions in GSME practiced no extensive planting on marginal and fragile soils as verified during site visit and document reviewed. This is manage accordance to Oil Palm Manual for Genting Plantation Manual under titled Managing Difficult Soils (GPS/GPRC) dated April 2021.</p> | Complied |

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| 7.6.3 | Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance - | Sighted available a Topographic Map of GSRE (Bangkar Division) and Tanjung Division in a Soils of Genting Sungei Rayat Estate (GSRE) dated July 201 by Param Agriculture Soil Surveys. | Complied | | | | | | | | | | | | | | | | | | | | |
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| Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly. | | | | | | | | | | | | | | | | | | | | | | | |
| 7.7.1 | (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance - | As verified found no new planting was conducted in Genting Plantation Estate sampled since 15/11/2018 regardless of soil type. | Complied | | | | | | | | | | | | | | | | | | | | |
| 7.7.2 | Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance - | Genting Plantations Estates has reported in the Peat Inventory to RSPO Secretariat records of 338.03 Ha of peat area which was identified in GSRE (Sing Mah Division). The peat is classified as deep peat as reported in GSME Peat Drainability Report dated 15/02/2021 prepared by Genting Plantation Research Centre. | Complied | | | | | | | | | | | | | | | | | | | | |
| 7.7.3 | (C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance - | <p>The subsidence of peat or lowering of peat surface level in GSRE (Sing Mah Division) is monitored every quarterly (3 months), documented. Started date of monitoring 05/0/2015. As abstracted monitoring data as below:</p> <table border="1"> <thead> <tr> <th>Date</th><th>Point A – OP19A (P98)</th><th>Point C – OP08A (P95)</th><th>Point B – OP20A (P08A)</th></tr> <tr> <th></th><th>(cm)</th><th>(cm)</th><th>(cm)</th></tr> </thead> <tbody> <tr> <td>05/10/2016</td><td>8.2</td><td>3.3</td><td>3.4</td></tr> <tr> <td>30/12/2020</td><td>7.8</td><td>28.5</td><td>2.1</td></tr> <tr> <td>31/12/2021</td><td>9.0</td><td>2.0</td><td>2.5</td></tr> </tbody> </table> | Date | Point A – OP19A (P98) | Point C – OP08A (P95) | Point B – OP20A (P08A) | | (cm) | (cm) | (cm) | 05/10/2016 | 8.2 | 3.3 | 3.4 | 30/12/2020 | 7.8 | 28.5 | 2.1 | 31/12/2021 | 9.0 | 2.0 | 2.5 | Complied |
| Date | Point A – OP19A (P98) | Point C – OP08A (P95) | Point B – OP20A (P08A) | | | | | | | | | | | | | | | | | | | | |
| | (cm) | (cm) | (cm) | | | | | | | | | | | | | | | | | | | | |
| 05/10/2016 | 8.2 | 3.3 | 3.4 | | | | | | | | | | | | | | | | | | | | |
| 30/12/2020 | 7.8 | 28.5 | 2.1 | | | | | | | | | | | | | | | | | | | | |
| 31/12/2021 | 9.0 | 2.0 | 2.5 | | | | | | | | | | | | | | | | | | | | |

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| | | 06/12/2022 | 2.0 | 2.5 | 2.5 | |
| | | 20/09/2023 | 0.5 | 0.5 | 0.5 | |
| | | 20/12/2023 | 0.4 | 0.8 | 0.8 | |
| 7.7.4 | <p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p> | <p>The water and ground cover management programme is documented in Genting Plantation Berhad as documented in Water Management in Inland, Costal and Peat lands (SMP 15) issued on 12/11/2014. Refer to respective Water Management Plan mainly to monitor among others the following.</p> | | | | Complied |
| 7.7.5 | <p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p> | <p>Genting Plantation Berhad is maintaining documented document titled Drainability Assessment Procedure as the guidance in conducting the drainability assessment. Available A GSME (Genting Sing Mah Estate) Peat Drainability Report dated 15/02/2021 prepared by Genting Plantation Research Centre (GPRS) as additional report from previous report generated on 04/02/2019. Drainage system specifically for peat soil management. The basic requirements in peat area such as water management bund is in place in GSME as visited at Water Level Station-Water Bund 5, (total 7 Water Management Bund established).</p> | | | | Complied |
| 7.7.6 | <p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p> | <p>As sampled in GSRE (Sing Mah Division) during site visit, existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) and associated audit guidance. This was observed during site audit and verified with a procedure titled Water Management in Inland, Costal and Peat lands (SMP 15) issued on 12/11/2014.</p> | | | | Complied |

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|---|--|---|----------|
| 7.7.7 | <p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p> | As sampled in GSRE (Sing Mah Division) unplanted and set-aside peatlands in the managed area are protected as “peatland conservation areas”; found and observed no new drainage, road building and power lines on peat soils. This was verified during site visit found area protected as “peatland conservation areas”; no new drainage, road building and power lines constructed on the set aside peatland. | Complied |
| Criterion 7.8: Practices maintain the quality and availability of surface and groundwater. | | | |
| 7.8.1 | <p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p> | <p>Genting Ayer Item Certification Unit estates and mill have established its Water Management Plan. The objective of the plan is to maintain water source, ensure efficient use of water, ensure renewability of water source and avoidance of surface and ground water contamination.</p> <p>a. GAIOM have established the Water Management Plan for the Mill Operations and Linesite for 2024. GAIOM does not restrict access to clean water for all its employees. The mill provides where they treat the water obtained from underground tube well. The mill regularly treats the water to ensure the water quality is within the specifications of NWQS. The most recent water sampling was conducted on 17/10/2023 with the report (Report Number: W/2310/63387) available for verification. The results indicated that the specifications were within the World Health Organisation Guideline.</p> <p>b. GKBE have established the Water Management Plan for 2024 and available for verification. GKBE does not restrict access to clean water for all its employees. All employees are provided Government Treated Water by Syarikat Air Johor (SAJ) which is provided free by the estate.</p> | Complied |

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| | | <p>c. GSGE have established the Water Management Plan for 2024 and available for verification. GSGE does not restrict access to clean water for all its employees. All employees are provided Government Treated Water by Syarikat Air Johor (SAJ) which is provided free by the estate.</p> <p>d. GTME have established the Water Management Plan for 2024 and available for verification. GTME does not restrict access to clean water for all its employees. All employees are provided Government Treated Water by Syarikat Air Johor (SAJ) which is provided free by the estate.</p> | |
| 7.8.2 | <p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p> | <p>The protection of watercourses is guided by the procedure Genting Plantations Berhad; Sustainability Management Procedure Manual; Riparian Buffer Zone Management; Doc Number: SMO-GPB-14; revision: 02; Date: 16/03/2020. Riparian buffer zones have been established along all the rivers that flow through the estates and verified during the site visit. The management have erected signages prohibiting of works such as manuring and spraying, trespassing and encroachments as well as fishing to be done within the riparian buffers. During the visit there were no evidence of chemical or manuring works being done at the riparian reserves. Workers have been provided awareness trainings and documents of trainings were available for verification.</p> <p>Genting Plantations Berhad have established a Sustainability Management Procedure Manual for Water Sampling and Analysis, Document Number: SMP- GPB-15 (Issue Date: 12/11/2014) which provide guidelines on water quality sampling to ensure that proper practices are implemented at site to comply with RSPO Requirements. The estates have identified water sampling points at the river/stream inlets and outlets and conduct water sampling</p> | Complied |

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|---|---|---|----------|-------------------|------|---|-----------|-------|---|--------------|-------|----------|
| | | every 6 months. The samples are sent to accredited laboratories for sampling and monitored accordingly. | | | | | | | | | | |
| 7.8.3 | Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance - | Mill effluent is treated in compliance with the Department of Environment (DOE); Syarat Syarat Lesen – Premis Kilang Minyak Kelapa Sawit Mentah. The mill monitors the effluent on a monthly basis and reports to DOE on a quarterly basis via the Online Environment Reporting (OER) System were available for verification and continuously comply with the stipulated limit. | Complied | | | | | | | | | |
| 7.8.4 | Mill water use per tonne of FFB is monitored and recorded. - Minor compliance - | Records of Water Usage for January – December 2023 was available for verification in the mill. The data ranging from 1.2 – 1.5 m3/FFB were verified throughout the year. | Complied | | | | | | | | | |
| Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised | | | | | | | | | | | | |
| 7.9.1 | A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance - | <p>The monitoring is recorded in environment performance indicator-electricity generated by steam turbine tabulated for 2023 and to date 2024. It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt CPO. A monthly record on energy consumption for both renewable and non-renewable sources were also maintained and documented. It is monitored to optimize use of renewable energy. The electricity energy monitoring based on CPO produced tabulated as shown below;</p> <table><tr><td></td><td>Energy Monitoring</td><td>2023</td></tr><tr><td>1</td><td>kWh / CPO</td><td>97.53</td></tr><tr><td>2</td><td>Diesel / CPO</td><td>0.918</td></tr></table> <p>Variation of ratio in the analysis were explained and justified. Under the energy management plan 2024 the mill aimed for reduction plan for fossil fuel usage;</p> <ul style="list-style-type: none">- Educate workers on fuel saving practices.- Preventive maintenance programme | | Energy Monitoring | 2023 | 1 | kWh / CPO | 97.53 | 2 | Diesel / CPO | 0.918 | Complied |
| | Energy Monitoring | 2023 | | | | | | | | | | |
| 1 | kWh / CPO | 97.53 | | | | | | | | | | |
| 2 | Diesel / CPO | 0.918 | | | | | | | | | | |

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| Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions. | | | |
|---|--|--|----------|
| 7.10.1 | <p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p> | <p>Main sources of GHG emission identified were methane (CH₄) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO₂, SO_x and NO_x from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO's Palm GHG Calculator ver. 4.</p> | Complied |
| 7.10.2 | <p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p> | Not applicable since no new development by the certification unit. | Complied |
| 7.10.3 | <p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p> | <p>Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment, among the identified sources of gaseous emissions were boiler chimney, diesel engines and POME to name a few. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring for dust particulate.</p> <p>Each operating units have established Pollution Prevention Plans to reduce and prevent pollutions within the area of certification. GAIOM have conducted Chimney Gas Emission Monitoring in compliance to the DOE Compliance Schedule. The gas emission monitoring reports were available for verification.</p> | Complied |
| Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area | | | |

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| 7.11.1 | (C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance - | Based on the site visit of the replanting area at the estate, there was no evidence that fire had been used for land preparation. Oil palms were felled, chipped, and windrowed. | Complied |
| 7.11.2 | The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance - | Genting Plantation Berhad; Standard Operating Procedure; Fire Prevention and Control Measures; Doc Number: SDP-PD-12 Revision: 00; Issue Date: Oct 2020 has been established and available for verification. | Complied |
| 7.11.3 | The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance - | The above-mentioned fire prevention and control measures were communicated to the stakeholders via providing the procedure to the identified stakeholders. The stakeholders have acknowledged received of the document and it was available for verification. Engagement session with stakeholder on fire prevention concurrently done during stakeholder consultation meeting at each respective operating units. | Complied |
| Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced. | | | |
| 7.12.1 | (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance - | No new development within the Genting Ayer Item Oil Mill Certification Units since November 2005. The Certification Units has conducted the HCV assessment as per report Inventory on HCV sites within Genting Plantations Berhad Group of Estates – Central Region (Genting Tebong Estate and Genting Tanah Merah Estate) and Inventory on HCV sites within Genting Plantations Berhad Group of Estates and Southern Region (Genting Kulai Besar Estate and Genting Sungai Rayat Estate) conducted in February to March 2010 by S.K. Yap Forestry and Landscape Advisory Services. | Complied |
| 7.12.2 | (C) HCVs, HCS forests and other conservation areas are identified as follows: | Genting Ayer Item Certification Unit have established an Inventory on HCV Sites Within Genting Plantations Berhad Group of Estate | Complied |

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| | <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -</p> | <p>(Southern Region) – Feb 2010 and Inventory on HCV Sites Within Genting Plantations Berhad Group of Estates (Central Region) and (Southern Region) – Feb to Mar 2010.</p> <table><tr><th>Estate</th><th>HCV category</th><th>Hectarage</th></tr><tr><td>Genting Kulai Besar Estate</td><td>4.2 (riparian buffer zone)</td><td>10.64 ha</td></tr><tr><td>Genting Genting Sungei Rayat Estate</td><td>HCV 6 (cultural value – temple and cemetery)</td><td>0.18 ha</td></tr><tr><td>Genting Sri Gading Estate</td><td>4.2 (riparian buffer zone) HCV 6 (cultural value – temple and cemetery)</td><td>25.82 ha</td></tr><tr><td>Genting Tebong Estate</td><td>HCV 1.4 (catchment/pond), HCV 4.2 (riparian buffer zone), HCV 6 (cultural value – temple and cemetery)</td><td>34.31 ha</td></tr></table> | Estate | HCV category | Hectarage | Genting Kulai Besar Estate | 4.2 (riparian buffer zone) | 10.64 ha | Genting Genting Sungei Rayat Estate | HCV 6 (cultural value – temple and cemetery) | 0.18 ha | Genting Sri Gading Estate | 4.2 (riparian buffer zone) HCV 6 (cultural value – temple and cemetery) | 25.82 ha | Genting Tebong Estate | HCV 1.4 (catchment/pond), HCV 4.2 (riparian buffer zone), HCV 6 (cultural value – temple and cemetery) | 34.31 ha | |
|-------------------------------------|--|---|----------------|--------------|-----------|----------------------------|----------------------------|----------|-------------------------------------|--|---------|---------------------------|--|----------|-----------------------|--|----------|--|
| Estate | HCV category | Hectarage | | | | | | | | | | | | | | | | |
| Genting Kulai Besar Estate | 4.2 (riparian buffer zone) | 10.64 ha | | | | | | | | | | | | | | | | |
| Genting Genting Sungei Rayat Estate | HCV 6 (cultural value – temple and cemetery) | 0.18 ha | | | | | | | | | | | | | | | | |
| Genting Sri Gading Estate | 4.2 (riparian buffer zone) HCV 6 (cultural value – temple and cemetery) | 25.82 ha | | | | | | | | | | | | | | | | |
| Genting Tebong Estate | HCV 1.4 (catchment/pond), HCV 4.2 (riparian buffer zone), HCV 6 (cultural value – temple and cemetery) | 34.31 ha | | | | | | | | | | | | | | | | |
| 7.12.3 | Indicator is not applicable in Malaysia context | Not applicable | Not Applicable | | | | | | | | | | | | | | | |
| 7.12.4 | (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once | The Certification Units has conducted the HCV assessment as per report Inventory on HCV sites within Genting Plantations Berhad Group of Estates – Central Region (Genting Tebong Estate and Genting Tanah Merah Estate) and Inventory on HCV sites within Genting Plantations Berhad Group of Estates and Southern Region (Genting Kulai Besar Estate and Genting Sungai Rayat Estate) | Complied | | | | | | | | | | | | | | | |

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| | <p>every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p> | <p>conducted in February to March 2010 by S.K. Yap Forestry and Landscape Advisory Services.</p> <p>The sampled estates have established and documented HCV area/Biodiversity management Plan. Generally, among the plans established were:</p> <p>i) Maintaining signages</p> <p>ii) Continue to record HCV monitoring such as wildlife sighting, encroachment and illegal hunting</p> <p>iii) Enhancing HCV awareness among employees.</p> <p>The estates continue to train the workers on HCV and RTE Species. Signage on prohibition of illegal hunting or fishing, no swimming and chemical application at buffer zone area were erected at the HCV area. Noted during site visit, all signages visibly maintained in good condition.</p> | | | | |
| 7.12.5 | <p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p> | <p>Not applicable since there is no land clearing after November 2005.</p> | <p>Complied</p> | | | |
| 7.12.6 | <p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p> | <p>The estates continue to train the workers on HCV and RTE Species. Signage on prohibition of illegal hunting or fishing, no swimming and chemical application at buffer zone area were erected at the HCV area, housing area and notice board to educate the workers. The monitoring conducted by monthly basis and the record was available in each sampling estate.</p> <table><tr><td>Estate</td><td>Training</td><td>Date of training</td></tr></table> | Estate | Training | Date of training | <p>Complied</p> |
| Estate | Training | Date of training | | | | |

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| | | <table><tr><td>Genting Kulai Besar Estate</td><td>HCV/buffer zone training RTE awareness training</td><td>18/09/23 4/09/23</td></tr><tr><td>Genting Seri Gading Estate</td><td>HCV & RTE management plan HCV & RTE procedure: SMP-GPB-30 Human – Wildlife conflicts</td><td>14-15/11/2023</td></tr></table> | Genting Kulai Besar Estate | HCV/buffer zone training RTE awareness training | 18/09/23 4/09/23 | Genting Seri Gading Estate | HCV & RTE management plan HCV & RTE procedure: SMP-GPB-30 Human – Wildlife conflicts | 14-15/11/2023 | |
| Genting Kulai Besar Estate | HCV/buffer zone training RTE awareness training | 18/09/23 4/09/23 | | | | | | | |
| Genting Seri Gading Estate | HCV & RTE management plan HCV & RTE procedure: SMP-GPB-30 Human – Wildlife conflicts | 14-15/11/2023 | | | | | | | |
| 7.12.7 | <p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p> | <p>Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the GM/SHO and also personnel from the Sustainability unit. Sighting of RTE recorded during the AP rounds in the estates if any. Records of HCV monthly monitoring checked:</p> <table><tr><td>Estate</td><td>HCV area/Field no.</td><td>Remarks</td></tr><tr><td>Genting Kulai Besar Estate</td><td>OP96 (HCV 4)</td><td>i) No encroachment and illegal activity recorded. ii) Signboard erected and in good condition. iii) No disturbance at the established riparian area.</td></tr></table> | Estate | HCV area/Field no. | Remarks | Genting Kulai Besar Estate | OP96 (HCV 4) | i) No encroachment and illegal activity recorded. ii) Signboard erected and in good condition. iii) No disturbance at the established riparian area. | Complied |
| Estate | HCV area/Field no. | Remarks | | | | | | | |
| Genting Kulai Besar Estate | OP96 (HCV 4) | i) No encroachment and illegal activity recorded. ii) Signboard erected and in good condition. iii) No disturbance at the established riparian area. | | | | | | | |

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| | | Genting Seri Gading Estate | OP14 (HCV 4), OP 15B (HCV 6) | i) No encroachment and illegal activity recorded. ii) Signboard erected and in good condition. iii) No disturbance at the established riparian area. | |
| | | Genting Sungei Rayat Estate | P16AP (HCV 4), P18AD (HCV 6) | i) No encroachment and illegal activity recorded. ii) Signboard erected and in good condition. iii) No disturbance at the established riparian area. | |
| | | Genting Tebong Estate | OP95A (HCV 1.4), OP2002(A) (HCV 4.2), OP95 (HCV 6) | i) No encroachment and illegal activity recorded. ii) Signboard erected and in good condition. iii) No disturbance at the established riparian area. | |

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| 7.12.8 | (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance - | The audit findings have confirmed that there is no new planting affecting present HCV and primary forest. There were no land clearing activities made nor had damaged any forest to protect or enhance the HCV. | Complied |
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for **Genting Ayer Item POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2023** for **Genting Ayer Item POM** and supply base are as following:

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | 1.54 |
| PKO | 0 |

| Extraction | % |
|------------|-------|
| OER | 20.13 |
| KER | 5.17 |

| Production | t/yr |
|--------------|------------|
| FFB Process | 193,368.27 |
| CPO Produced | 38,933.027 |
| PKO Produced | 0 |

| Land Use | Ha |
|-----------------------------|------------------|
| OP Planted Area | 12,174.17 |
| OP Planted on peat | 338.03 |
| Conservation (forested) | 0 |
| Conservation (non-forested) | 157.06 |
| Total | 12,669.26 |

Summary of Field Emission and Sink

| | Own Crop* | | Group | | 3 rd Party | | Total | |
|--|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
| | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB |
| Emission | | | | | | | | |
| Land Conversion | 95,385.17 | 0.49 | 0 | 0 | 0 | 0 | 95,385.17 | 0.49 |
| CO ₂ Emission from fertilizer | 11,317.29 | 0.06 | 0 | 0 | 0 | 0 | 11,317.29 | 0.06 |
| NO ₂ Emission | 11,640.48 | 0.05 | 0 | 0 | 0 | 0 | 11,640.48 | 0.05 |
| Fuel Consumption | 1,925.85 | 0.01 | 0 | 0 | 0 | 0 | 1,925.85 | 0.01 |
| Peat Oxidation | 18,018.80 | 0.09 | 0 | 0 | 0 | 0 | 18,018.80 | 0.09 |
| Sink | | | | | | | | |
| Crop Sequestration | -86,949.95 | -0.45 | 0 | 0 | 0 | 0 | -86,949.95 | -0.45 |
| Conservation Sequestration | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 50,337.64 | 0.26 | 0 | 0 | 0 | 0 | 50,337.64 | 0.26 |

**Note: Includes both estates and smallholders*

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Summary of Mill Emission and Credit

| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 27,644.69 | 0.14 |
| Fuel Consumption | 1,146.37 | 0.01 |
| Grid Electricity Utilization | 0 | 0 |
| Credit | | |
| Export of Grid Electricity | 0 | 0 |
| Sales of PKS | -3,702.60 | -0.02 |
| Sales of EFB | 0 | 0 |
| Total | 25,088.45 | 0.13 |

Summary of Kernel Crusher Emission and Credit (if applicable)

| Emissions | tCO ₂ e |
|--------------------------------|--------------------|
| PK from own mill | 0 |
| PK from other source | 0 |
| Fuel Consumptions | 0 |
| Total Crusher emissions | 0 |

*This mill has no kernel crusher operation.

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

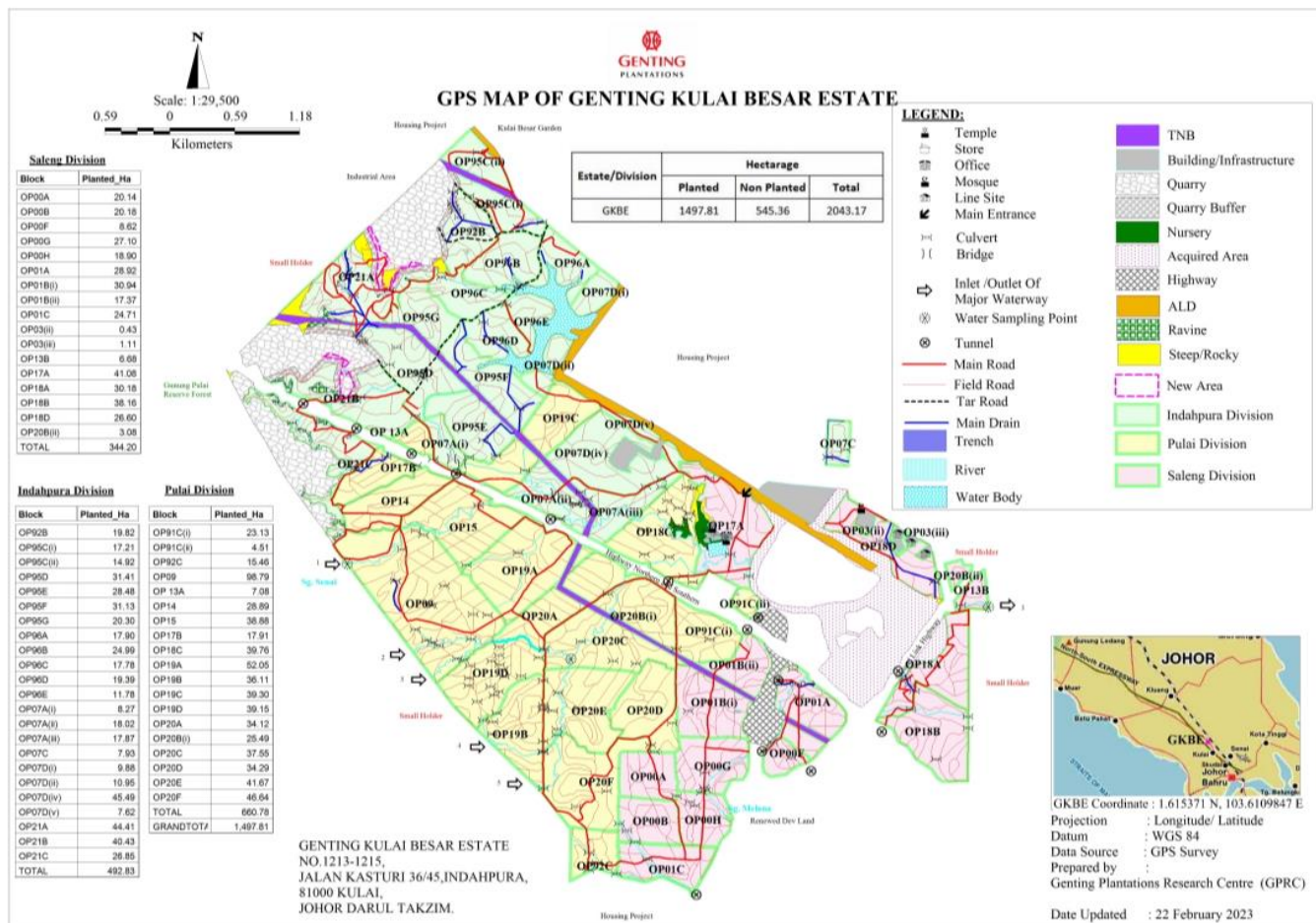
| POME Diverted to Anaerobic Digestion: | |
|--|-----|
| Divert to anaerobic pond (%) | 100 |
| Divert to methane captured (flaring) (%) | 0 |
| Divert to methane captured (energy generation) (%) | 0 |

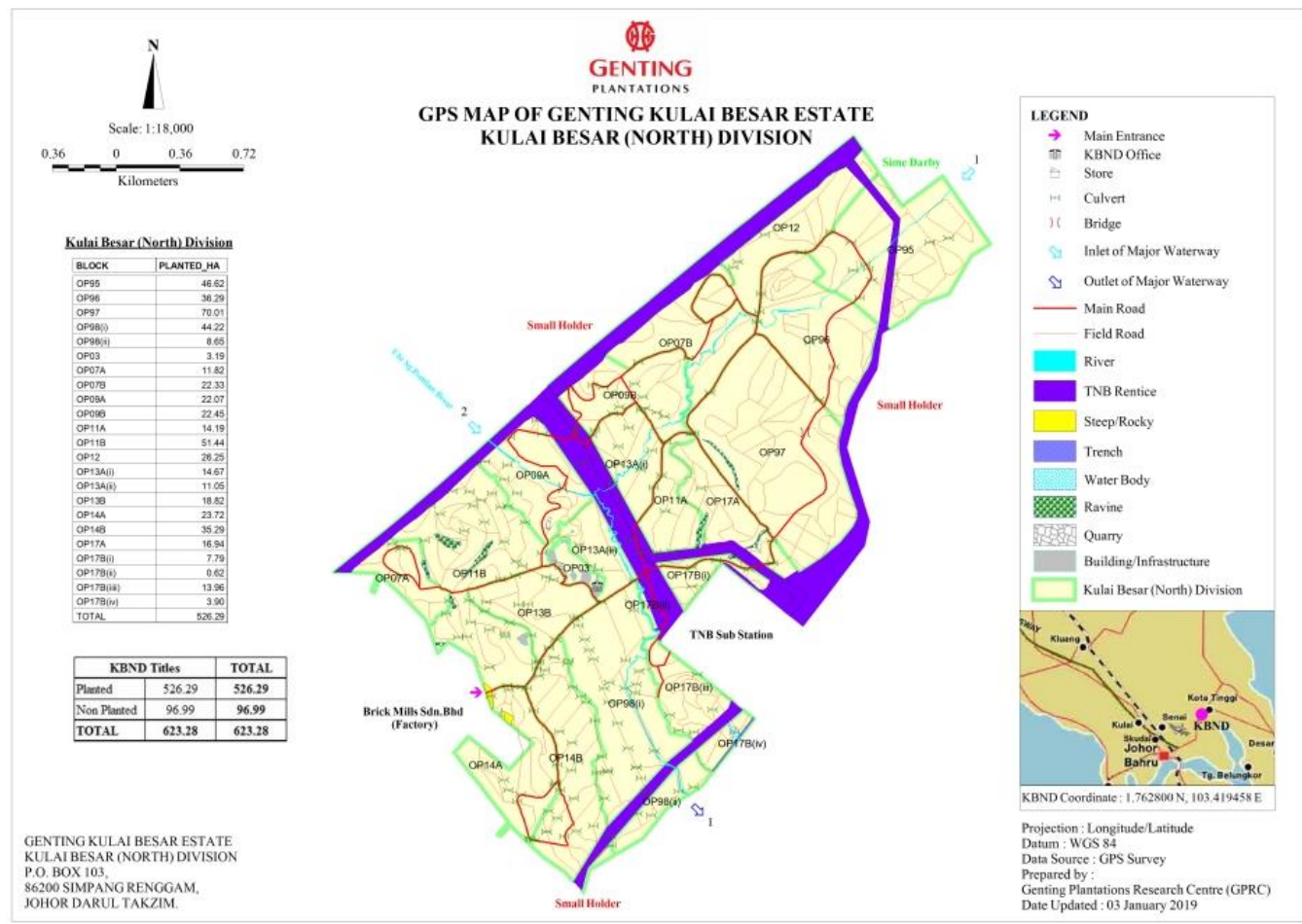
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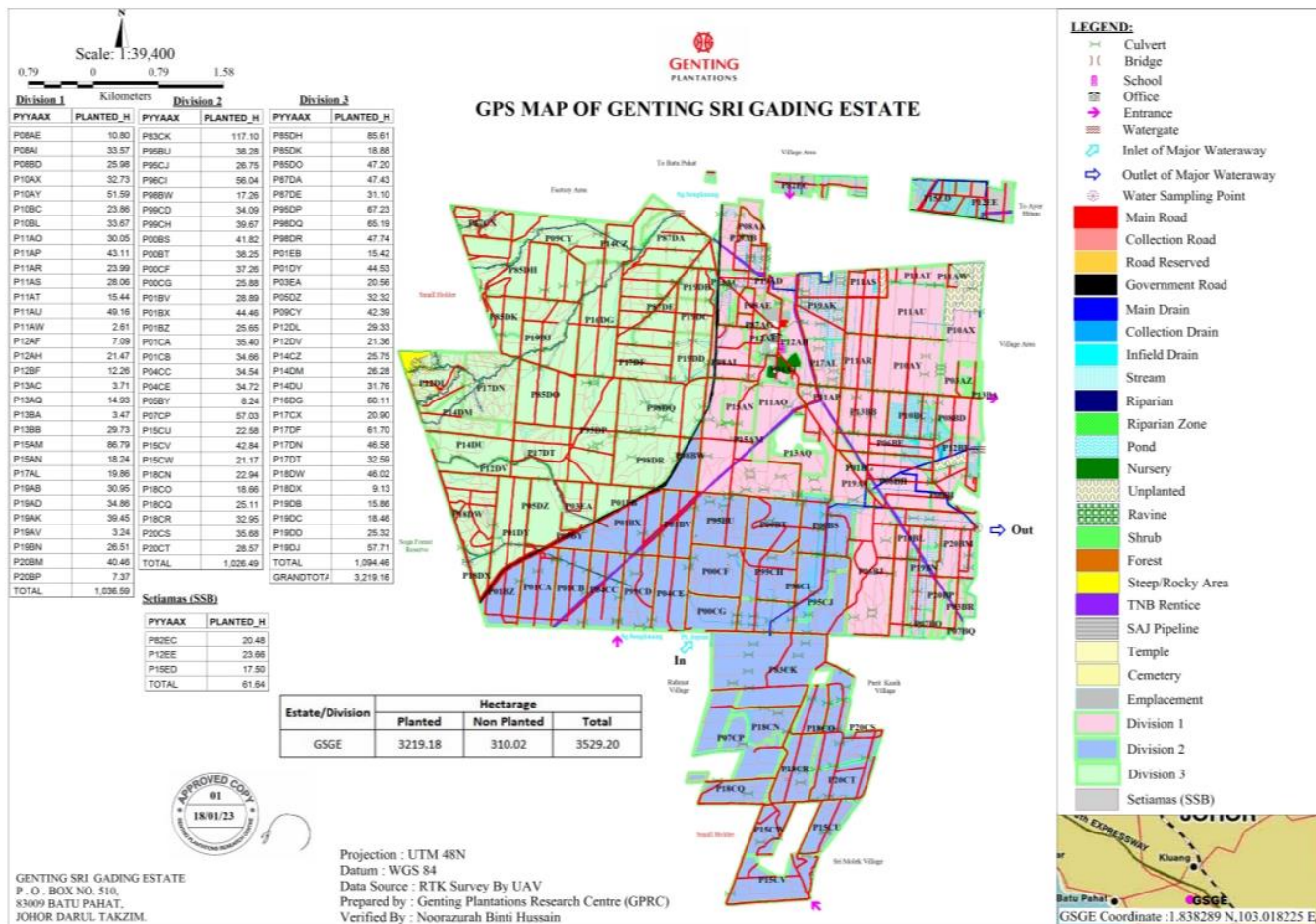
Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map

Genting Kulai Besar Estate (Main Div.)

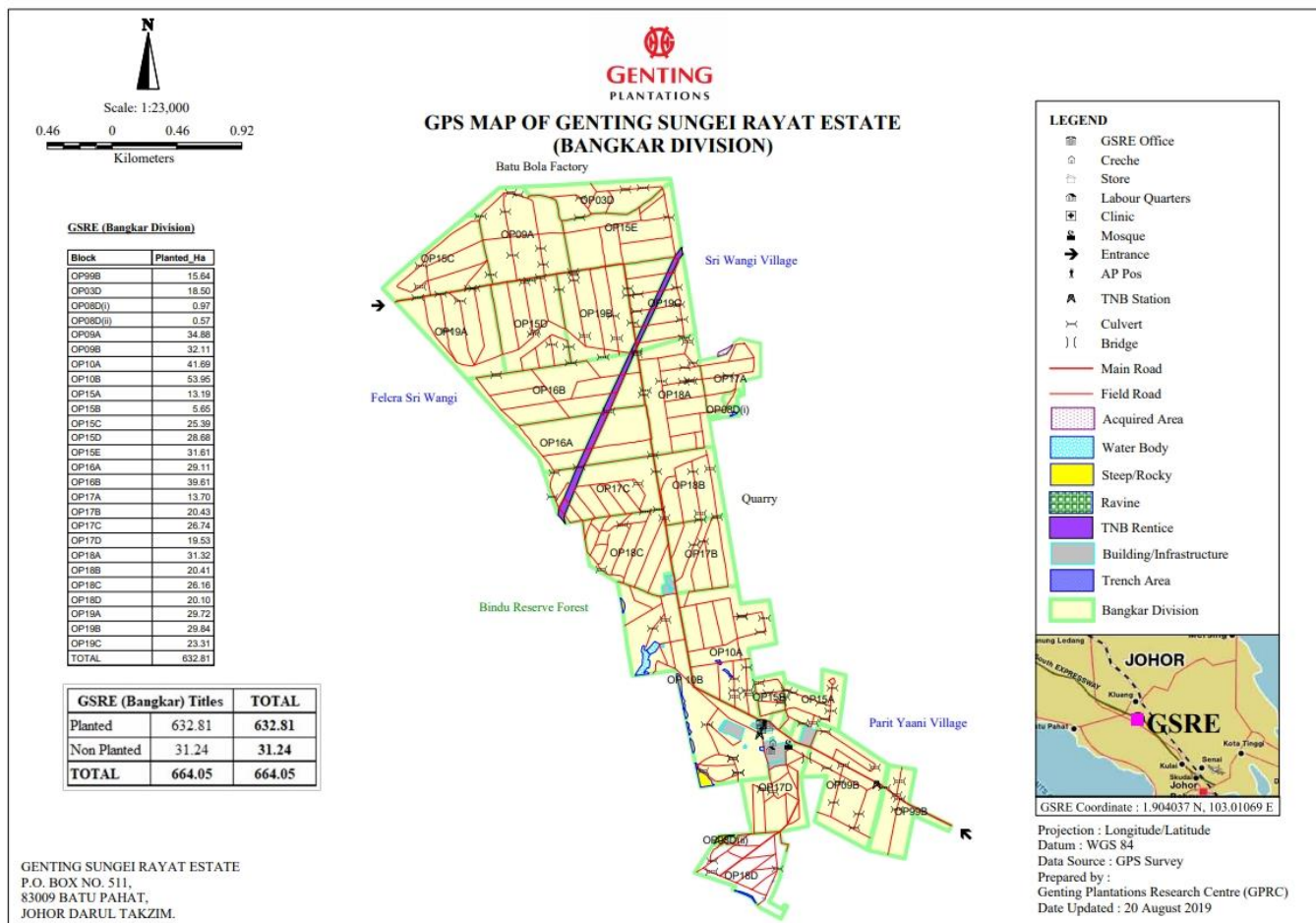
Genting Kulai Besar Estate (North Div.)

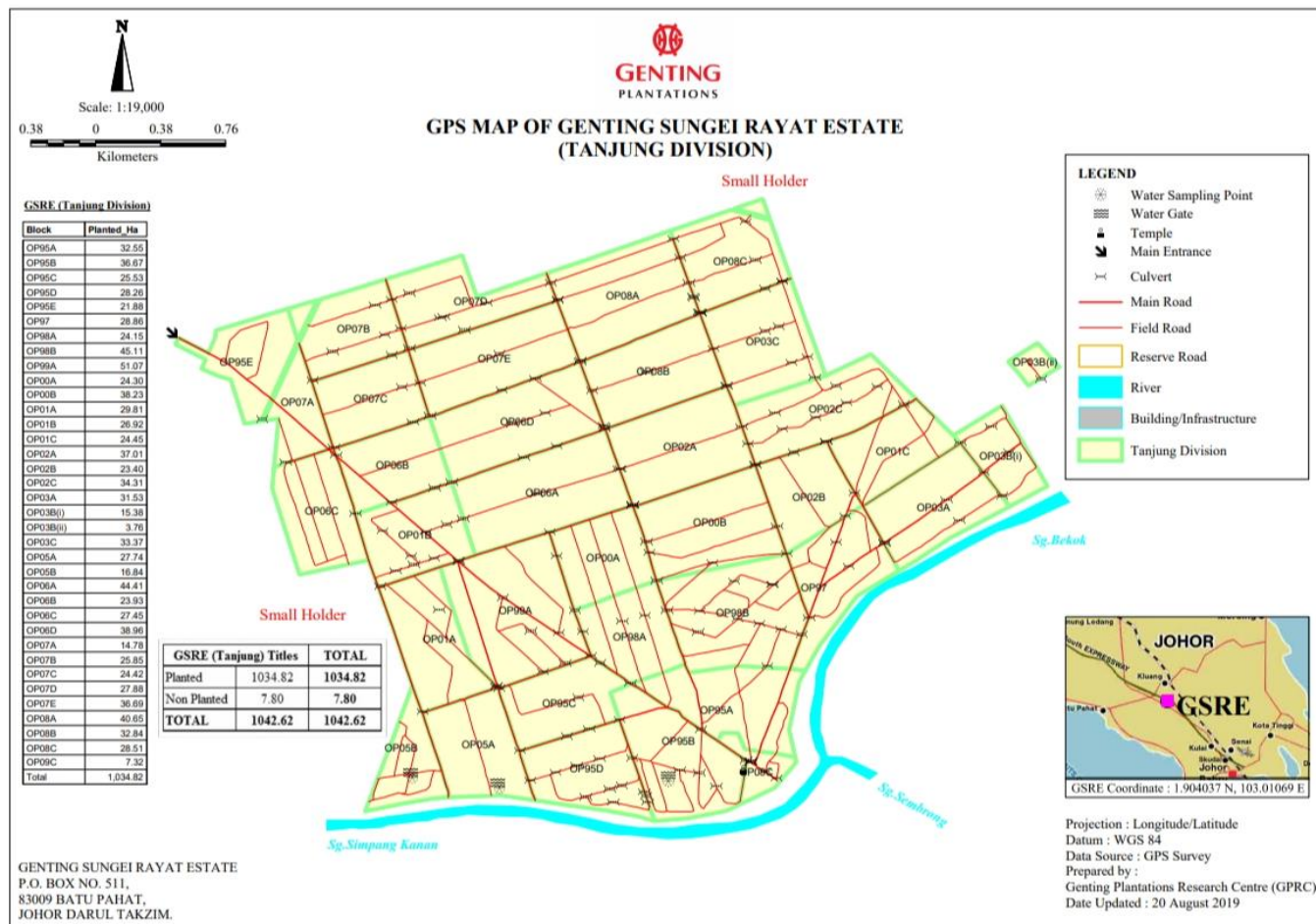
Genting Sri Gading Estate

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Genting Sungei Rayat Estate (Bangkar Div.)

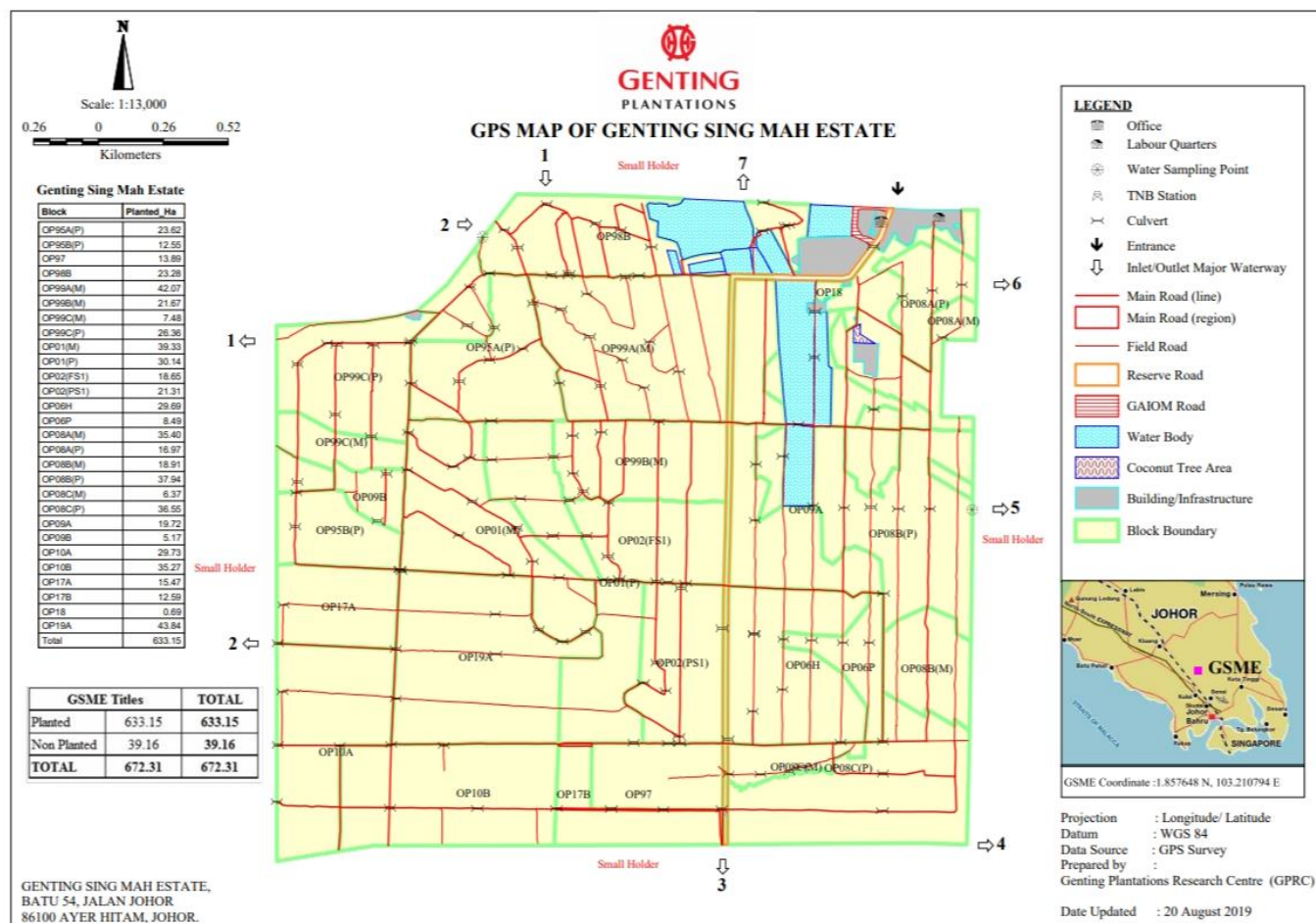


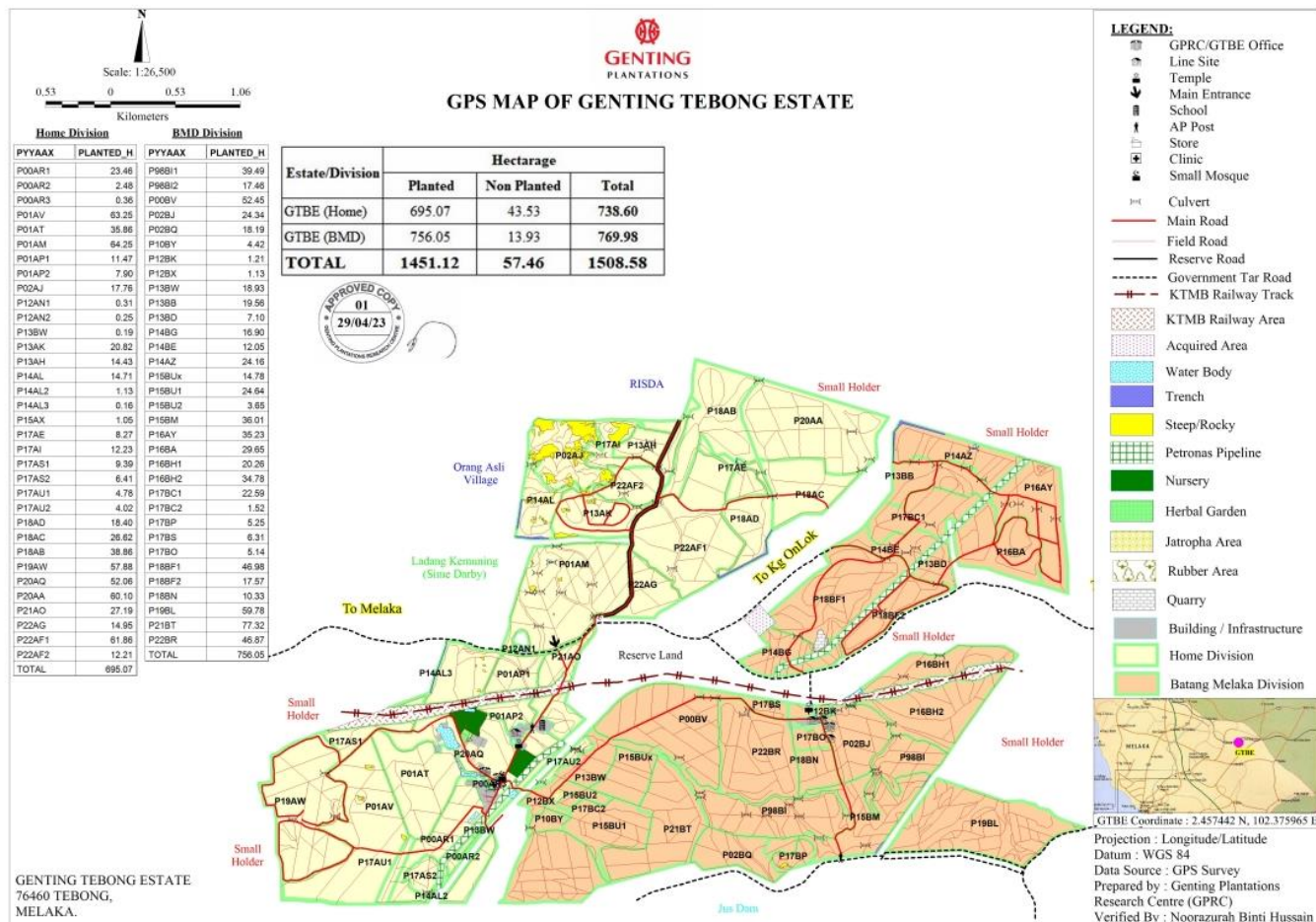
Genting Sungei Rayat Estate (Tanjung Div.)

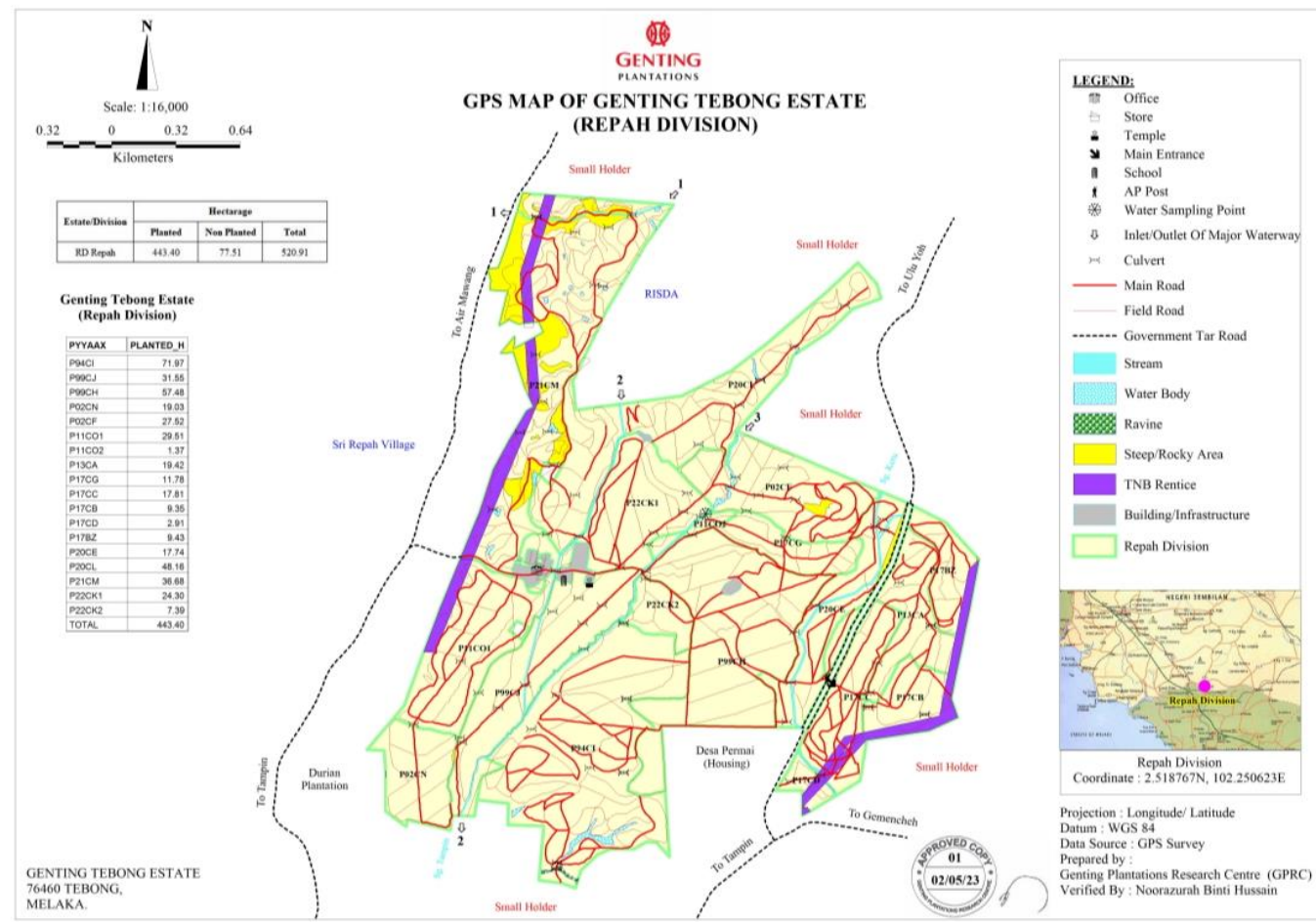
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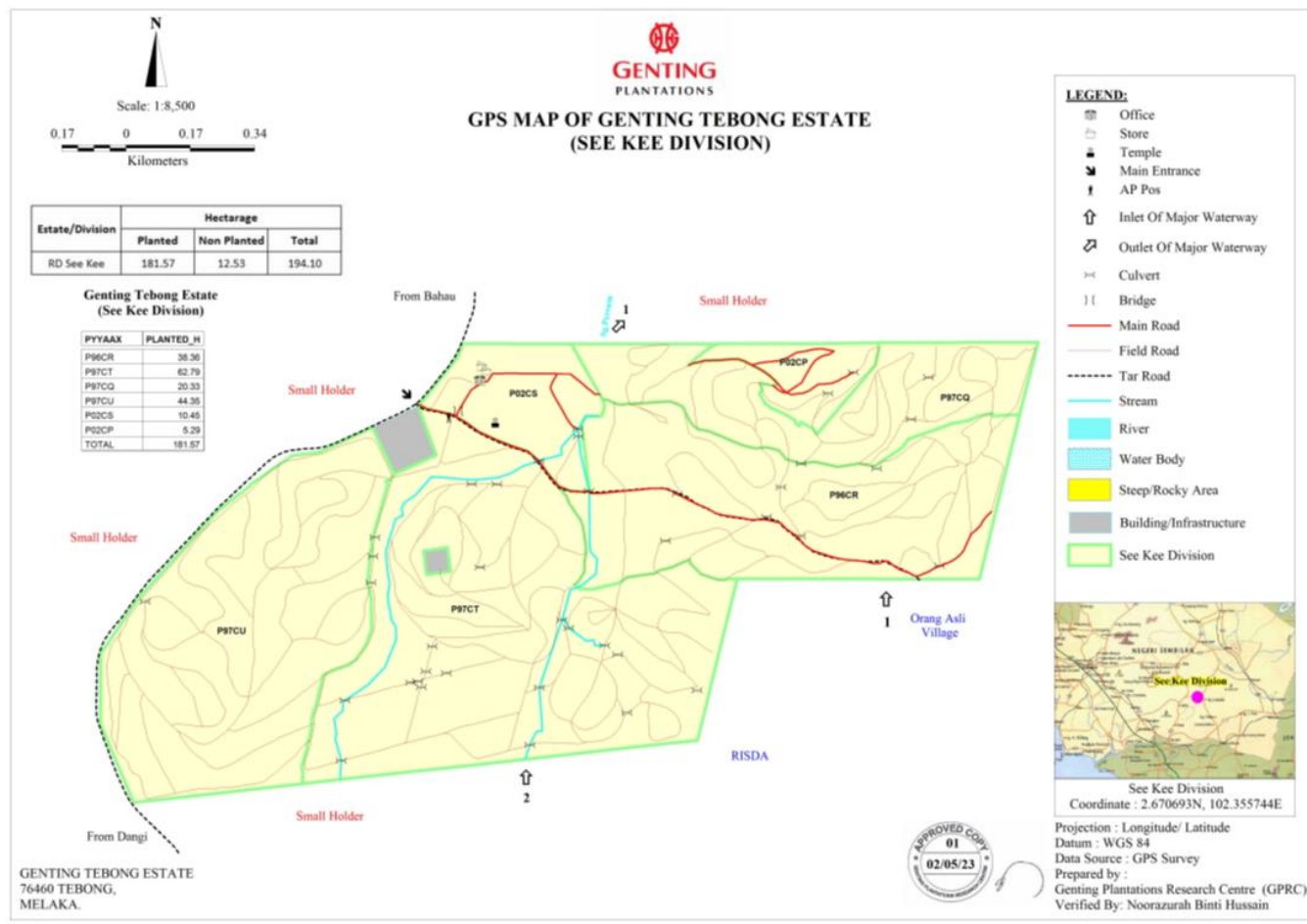
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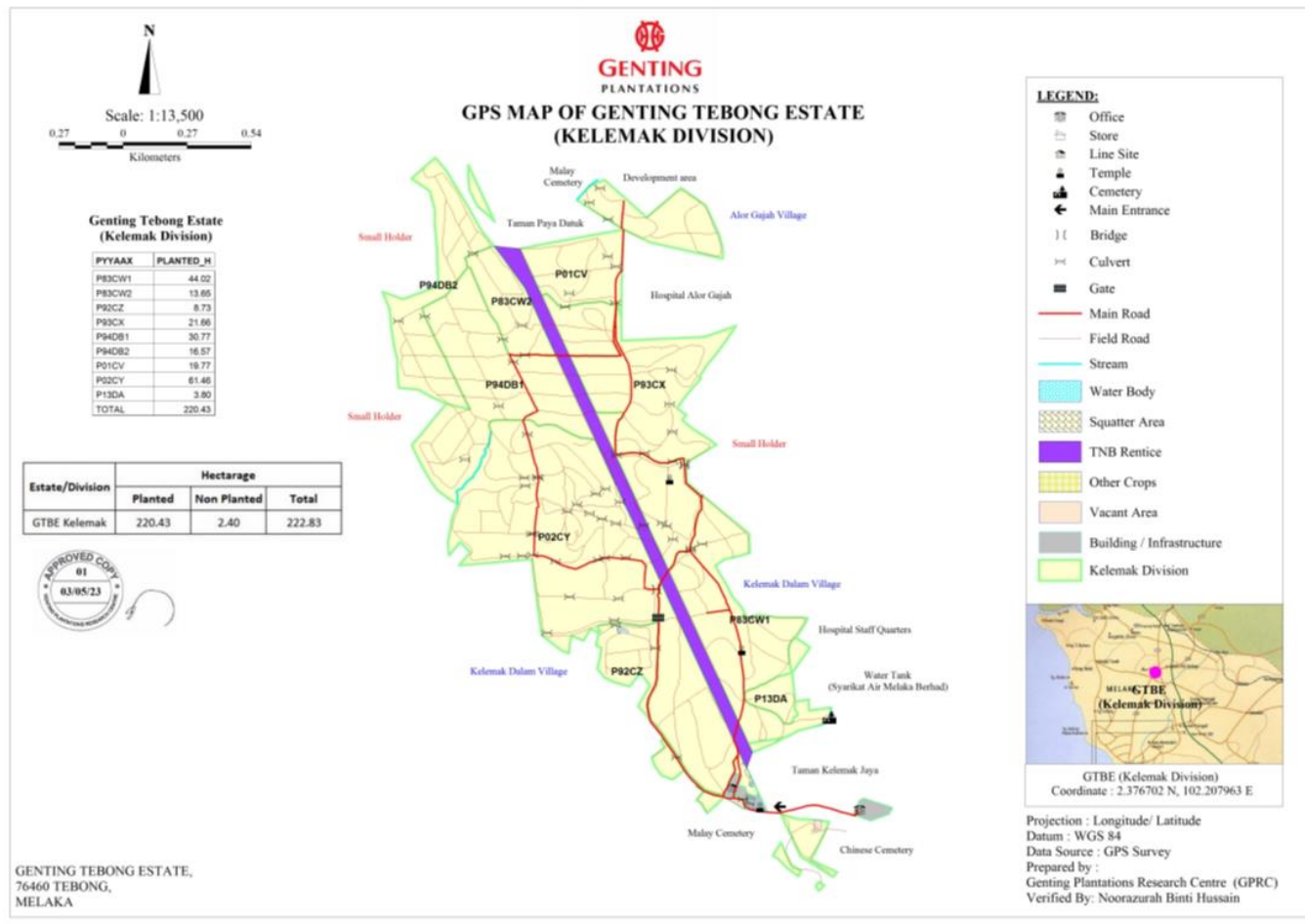
Genting Sungei Rayat Estate (Sing Mah Div.)



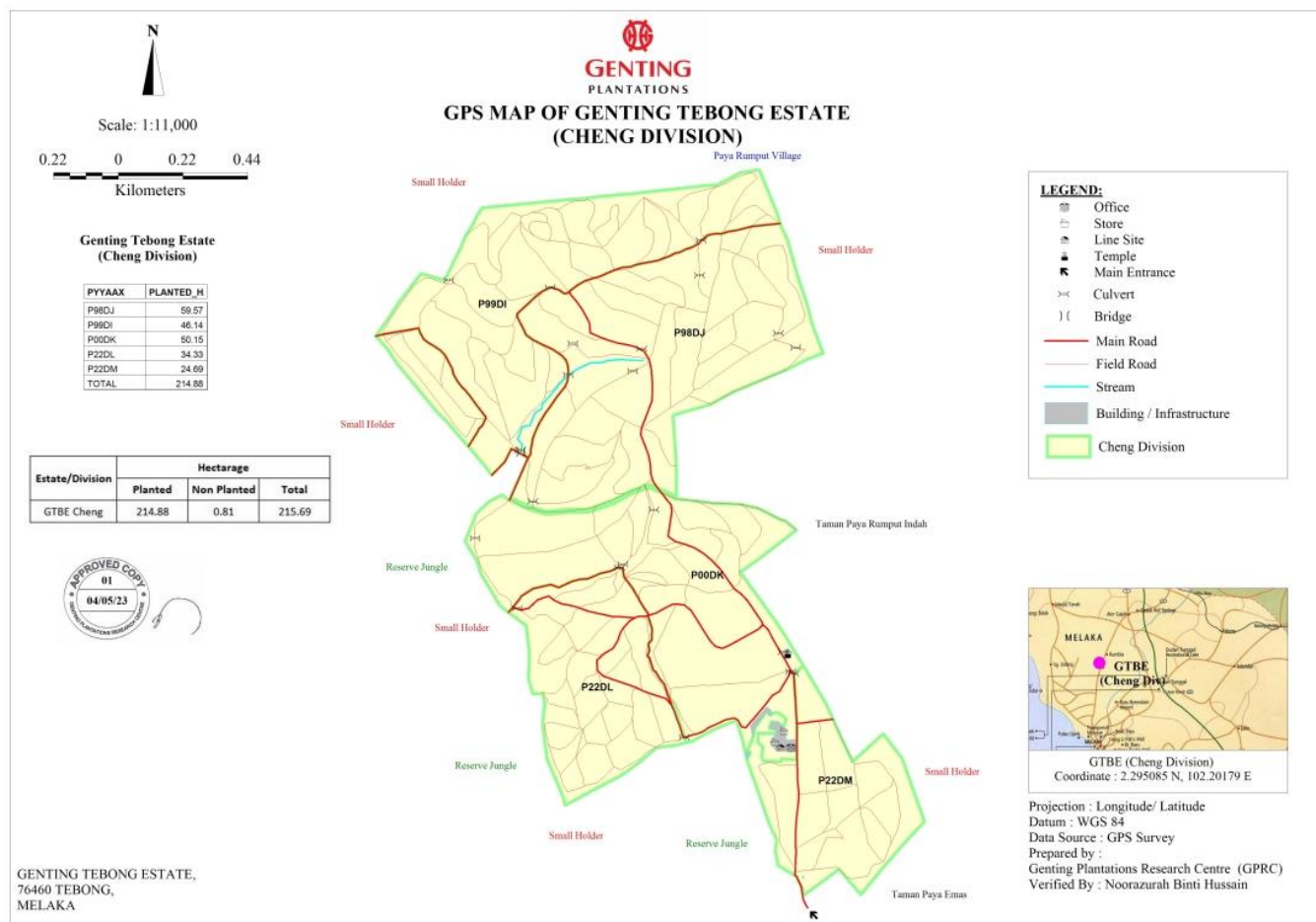
Genting Tebong Estate (Main Div.)

Genting Tebong Estate (Repah Div.)

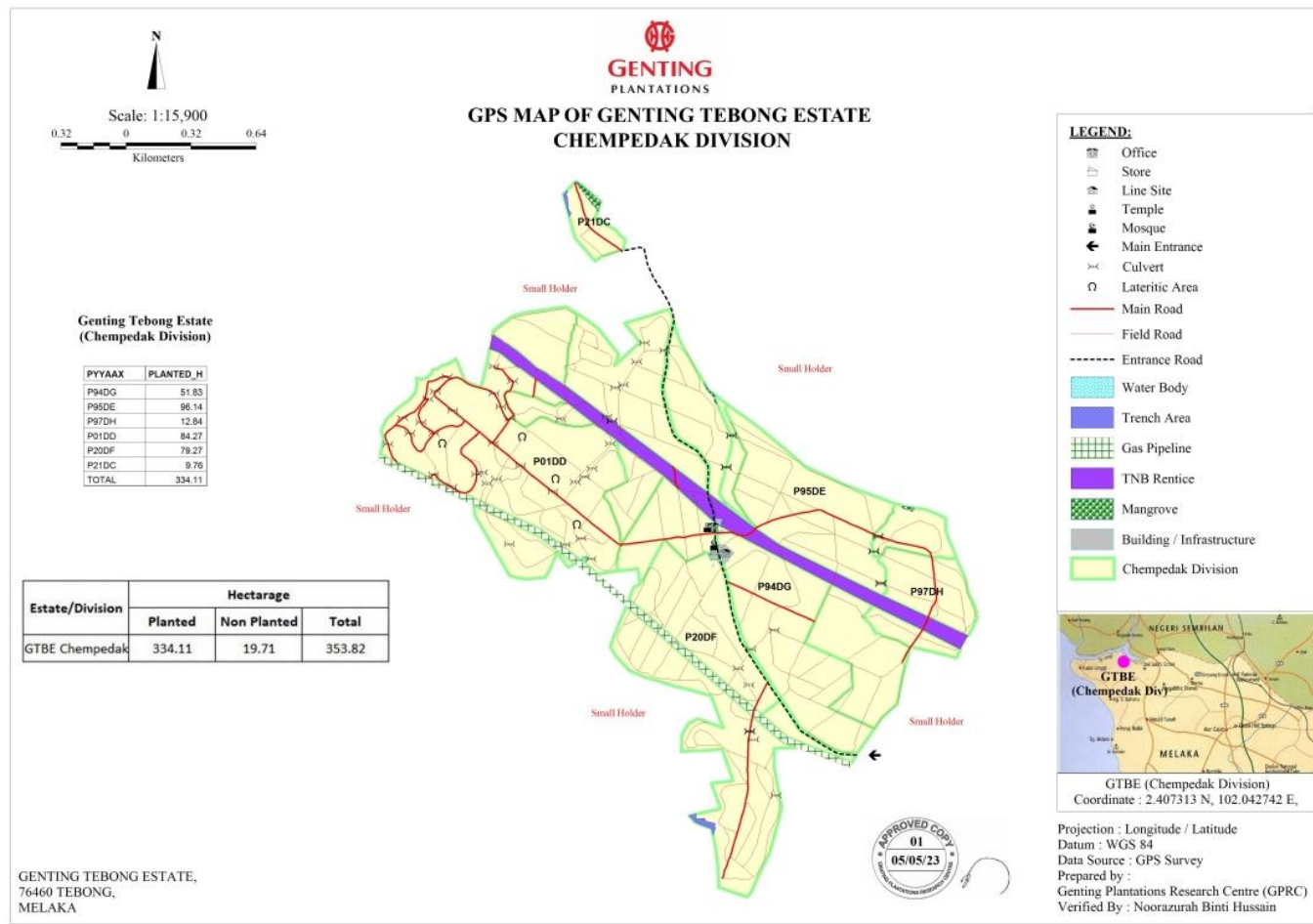
Genting Tebong Estate (See Kee Div.)

Genting Tebong Estate (Kelemak Div.)

Genting Tebong Estate (Cheng Div.)



Genting Tebong Estate (Chempedak Div.)



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Appendix E: List of Smallholder Registered and/or sampled

| Sampling Group | Current Certification | Scope Extension | Other: |
|--------------------------------------|-----------------------|-----------------|--------|
| Risk Factor Applied | N/A | N/A | N/A |
| Justification of Risk Factor Applied | | | |
| Number of samples | | | |
| Remarks | | | |

| No | Name of farmer | Location | GPS Reference | | Area Summary (Ha) | | Forecasted annual FFB Production (MT) | Date of joining | Smallholder ID |
|---|----------------|----------|---------------|---------------|----------------------|--------------|---------------------------------------|-----------------|----------------|
| | | | Latitude (N) | Longitude (E) | Total Certified Area | Planted Area | | | |
| Not Applicable | | | | | | | | | |
| Total | | | | | | | | | |
| Note: * are smallholders sampled in this audit. | | | | | | | | | |

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Appendix F: List of Abbreviations

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