

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- ☐ Initial Assessment
- ☒ Annual Surveillance Assessment (1_2)
- ☐ 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, Wilayah Persekutuan Kuala Lumpur, Malaysia.
Certification Unit: Genting Oil Mills (Sabah) Sdn Bhd - Genting Sabapalm Oil Mill Location of Certification Unit: KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia.
Date of Final Report: 25/10/2024

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Section 1: Scope of the Assessment

1. Company Details			
Name of Parent Company	Genting Plantations Berhad		
RSPO Membership Number	1-0086-06-000-00	Membership Approval Date	14/11/2006
Parent Company address:	10 th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia.		
Name of Palm Oil Mill / Group Manager / Estate:	Genting Oil Mills (Sabah) Sdn Bhd - Genting Sabapalm Oil Mill		
Palm Oil Mill / Group Manager / Estate location (address):	KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia		
Website	www.gentingplantations.com		
Contact Name	Mr. Abdul Rahim Wilson Abdullah – Senior Vice President – Plantation (Malaysia) Mr. James Chung Khim Hon – Senior Vice President – Group Processing Ms. Erika Jesham – Sustainability Executive	E-mail	rahim.abdullah@gentingplantations.com james.chung@gentingplantations.com erika.jesham@gentingplantations.com
Telephone	+603 2333 6510 (HO) +60192949349 (GSOM)	Facsimile	+603 2333 6575

2. Certification Information			
Certificate Number	RSPO 653477	Certificate Start Date	28/09/2022
Date of First Certification	09/06/2016	Certificate Expiry Date	27/09/2027
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_2) <input type="checkbox"/> Recertification Assessment (RA 1) <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 type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	20 mt/hr

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)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE119-60233799	ISCC EU	ASG Cert GmbH	31/12/2024
MSPO 689068	MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn. Bhd	09/10/2029
MSPO 689067	MS 2530-4:2013 – General Principles for Palm Oil Mills		09/10/2029

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Genting Sabapalm Oil Mill	25 Km, Down Sungai Labuk, Mukim Tagas-Tagas, Beluran	5° 57' 54.3" N	117° 22' 26.8" E
Genting Sabapalm Estate	25 Km, Down Sungai Labuk, Mukim Tagas-Tagas, Beluran	5° 57' 54.3" N	117° 22' 26.8" 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)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Sabapalm Estate	3,947.20	8.91	402.47	4,358.58	90.56
Total	3,947.20	8.91	402.47	4,358.58	90.56

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Genting Sabapalm Estate	311.59	1,554.35	1,813.55	267.71	3,635.61	311.59
Total (ha)	311.59	1,554.35	1,813.55	267.71	3,635.61	311.59

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Sep 23 – Aug 24)	Actual (Jul 23 - Jun 24)		Forecast (Sept 24 - Aug 25)
		Previous license period (Jul 23 - Sep 23)	Current license period (Oct 23 - Jun 24)	
Genting Sabapalm Estate	106,000.00	23,149.86	55,762.62	88,969.00
Total	106,000.00	78,912.48		88,969.00

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Sep 23 – Aug 24)	Actual (Jul 23 - Jun 24)		Forecast (Sept 24 - Aug 25)
		Previous license period (Jul 23 - Sep 23)	Current license period (Oct 23 - Jun 24)	
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 (Sep 23 – Aug 24)	Actual (Jul 23 - Jun 24)		Forecast (Sept 24 - Aug 25)
		Previous license period (Jul 23 - Sep 23)	Current license period (Oct 23 - Jun 24)	
Estate	5,500.00	2,365.72	3,925.99	5,767.00
Outgrower	2,550.00	802.93	2,009.50	2,912.00
Smallholder	15,150.00	5,800.16	11,714.65	15,925.00
Total	23,200.00	26,618.95		24,604.00

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	July 2023	6,960.95	2,319.67	9,280.62
2	August 2023	7,514.76	3,127.37	10,642.13

3	September 2023	8,674.15	3,521.77	12,195.92
4	October 2023	9,287.11	3,827.83	13,114.94
5	November 2023	8,114.08	3,904.22	12,018.30
6	December 2023	7,137.03	2,084.46	9,221.49
7	January 2024	5,034.21	1,390.01	6,424.22
8	February 2024	5,170.04	1,023.04	6,193.08
9	March 2024	1,650.91	296.19	1,947.10
10	April 2024	6,635.95	1,581.67	8,217.62
11	May 2024	6,589.62	1,911.90	8,501.52
12	June 2024	6,143.67	1,630.82	7,774.49
TOTAL		78,912.48	26,618.95	105,531.43

10. Summary of Certified Tonnage (MT) (not applicable for ISS)

Estimated last year (Sep 23 – Aug 24)	Actual (Jul 23 - Jun 24)		Forecast (Sept 24 - Aug 25)
	Previous license period (Jul 23 - Sep 23)	Current license period (Oct 23 - Jun 24)	
FFB	FFB		FFB
106,000.00 mt	23,149.86 mt	55,762.62 mt	88,969.00 mt
	TOTAL	78,912.48 mt	
CPO (OER: 20.90 %)	CPO (OER: 19.60 %)		CPO (OER: 19.53 %)
22,220.00 mt	4,513.81 mt	10,955.67 mt	17,375.00 mt
	TOTAL	15,469.48 mt	
PK (KER: 3.96 %)	PK (KER: 3.57 %)		PK (KER: 3.54 %)
4,200.00 mt	832.95 mt	1,987.16 mt	3,153.00 mt
	TOTAL	2,820.11 mt	

10A. Monthly Records of Certified CPO & PK since the last audit

No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	July 2023	1,349.27	252.90
2	August 2023	1,444.69	245.56
3	September 2023	1,719.85	334.49
4	October 2023	1,924.10	359.11
5	November 2023	1,648.82	298.28

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6	December 2023	1,298.75	251.08
7	January 2024	898.18	160.68
8	February 2024	967.07	173.28
9	March 2024	304.74	58.00
10	April 2024	1,401.49	242.27
11	May 2024	1,352.37	235.21
12	June 2024	1,160.15	209.25
TOTAL		15,469.48	2,820.11

11. Summary of Actual Volume sold**Current License period (Oct 23 - Jun 24)**

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	-	-	-	11,013.59	11,013.59
PK (MT)	1,942.44	-	-	213.04	2,155.48
Credits	-	-	-	-	-

Previous License period (Jul 23 - Sep 23)

CPO (MT)	-	-	-	4,235.06	4,235.06
PK (MT)	638.49	-	-	-	638.49
Credits	-	-	-	-	-

Note: Conventional is RSPO certified material but sold as non-RSPO.**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	XXX XXXXXX XXX SDN BHD	RSPO_PO1000007211	-	2,580.93
TOTAL			-	2,580.93

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

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11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	XXX SDN BHD	15,248.65	-
2	XXX SDN BHD	-	213.04
TOTAL		15,248.65	213.04

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 (Sep 23 – Aug 24)			Actual (Jul 23 - Jun 24)			Forecast (Sept 24 - Aug 25)		
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 (Jul 23- Sep 23)							

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Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (Oct 23 – Jun 24)							
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. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)
Website: www.bsigroup.com

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2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **12/08/2024 - 15/08/2024**. The audit programme is included as Section 2.3.

The approach to the audit was to treat the Choose an item. 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 remotely on **03/10/2024**. 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 Sabapalm POM	✓	✓	✓	✓	✓
Genting Sabapalm Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: August 11, 2025 – August 14, 2025

Total Number of Man-days: 9.5 Man-days

2.2 BSI Assessment Team

Name	Role	Competency
Fahmi Othman (FBO)	Team Leader	<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 a plantation company managing the day-to-day plantation operations before acting as Sustainability Officer for another significant 4 years. In his career, Fahmi had accumulated more than 9 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Prior to joining BSI, he was an auditor for another local certification body who experienced in MSPO and PEFC Certification Audit.</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 Language.</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p>

		<input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)
Hafriazhar Mohd Mokhtar (HMM)	Team Member	<p>Education: Bachelor of Engineering (Hons.) Chemical Engineering, UTM</p> <p>Work Experience: Has more than 20 years of working experience in multiple engineering disciplines emphasized on science, technology, and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation, and mining before auditing. In summary, his started his career as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in palm oil mill, Project Control Engineer (2008-2011) in mining and Auditor (2011-present) with accredited certification bodies</p> <p>Training attended: ILO Training (2024), HCV Training (2023), GHG Training (2022), Social Auditing & SMETA Training (2021), MSPO SCCS LA Training (2020), MSPO LA Training (2019) ISO 45001 LA Training (2018), RSPO LA Training (2017), RSPO SCCS LA Training (2016), RSPO P&C LA Training (2015), ISO 9001 LA Training (2014), ISO 50001 LA Training (2013), VCS Training (2012), CDM Training (2011), ISO 14001 LA Training (2011)</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English Language.</p> <p>Aspect covered in this audit:</p> <p> <input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system) </p>
Nor'ain binti Mohd Nasir (NMN)	Team member	<p>Education: She graduated in Bachelor of Science (Hons) (Plantation Technology and Management) from University Teknologi Mara (UiTM).</p> <p>Work Experience: She has 10 years working experience in plantation company with various departments such as Estate Operations, Risk and System Management Department and Sustainability and Quality Department prior to joining Certification Body as an Auditor for more than 4 years. She is familiar with oil palm operations and its supply chain including Social, Environmental, Safety and Health, Legal and Good Agricultural practices. She is involved in auditing MSPO OPMC, MSPO SCCS, RSPO P&C, RSPO SCCS, ISCC EU and PLUS Basic Training, ISCC Waste & Residue and ISCC Independent Smallholder.</p> <p>Training attended: She has completed 14001:2015 (2019), ISO 9001:2015 (2024), Endorsed MSPO Auditor Course (2019), Endorsed MSPO SCCS Auditor Course (2019), Endorsed RSPO P&C Lead Auditor Course (2019), Endorsed RSPO SCCS Lead Auditor Course (2019), SA8000 (2019), ISCC EU and PLUS Basic Training (2019), ISCC Waste And Residue (2020), ISCC Independent Smallholder (2020), ISCC (ARIA) Platform (2023), Roundtable on Sustainable Biomaterials (RSB) (2020), Refresher-endorsed RSPO P&C 2018 Lead Auditors Training Course (2021) and RSPO-endorsed RSPO SCCS Refresher Course (2022).</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English Language.</p> <p>Aspect covered in this audit:</p>

		<input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)
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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	FBO	HMM	NMN
Sunday, 11/08/2024	-	Audit Team travel from Kuala Lumpur to Sandakan, Sabah.	√	√	√
Monday, 12/08/2024	0900-1000	Genting Sabapalm Oil Mill Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan 	√	√	√
	1000 – 12.30	Genting Sabapalm 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	√	√	√
	1230-1330	LUNCH BREAK	√	√	√
	13.30 – 16.30	Genting Sabapalm Oil Mill Document review P1 – P7: 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.	√	√	√
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Tuesday, 13/08/2024	09.00 – 12.30	Genting Sabapalm Oil Mill Continue document review P1 – P7: 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.	√	√	√
	1000-1200	Meeting with Stakeholder (Government, Village Rep, smallholders, Union Leader, Contractors etc.)	√	√	√
	1230-1330	LUNCH BREAK	√	√	√
	1330-1630	Genting Sabapalm Estate 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.)	√	√	√
	16.30 – 17.00	Interim Closing briefing.	√	√	√

Date	Time	Subjects	FBO	HMM	NMN
Wednesday, 14/08/2024	0900-1230	Genting Sabapalm Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	1230-1330	LUNCH BREAK	√	√	√
	1330-1630	Genting Sabapalm Estate 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, 15/08/2024	0900-1200	Genting Sabapalm Oil Mill (Supervised By Mr Ahmad Ruffi Bin Abu Talib Khan) Document review: RSPO SCCS general requirements, internal audit, management review, market communication and claim requirements, sales and purchasing documents, mass balance accounting and other relevant documents and records of RSPO SCCS.	√		√
	1200-1230	Verify any Outstanding Issues and Preparation for Closing Meeting	√	√	√
	1230-1330	Closing Meeting	√	√	√
	1300	Audit Team Travel to Sandakan	√	√	√

Critical NC Close Out Remote Assessment Plan

Date	Time	Subjects	FBO	ICT Planned
Wednesday, 03/10/2024	1400-1600	Virtual Opening Meeting: 1. Opening Presentation by Audit Team Leader. 2. Confirmation of assessment scope and finalize Audit plan. 3. Verification on Critical NC: • 2534462-202408-M1 4. Workers Interview (Virtual) 5. Document review – implemented evidence	√	Microsoft Teams & Whatsapp
	1600-1630	Virtual Closing Meeting	√	

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?	The Time Bound Plan (TBP) includes all the companies under Genting Plantations Berhad, covering operations in both Malaysia and Indonesia. A full list of these companies and their management units is provided in the Approved Time Bound Plan dated 29/3/2023.	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. As stated in the approved Time Bound Plan dated 29/3/2023, Genting Plantations Berhad aims to certify all its management units by December 2025.	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 acquisition as of June 2023. TBP deviation approval dated 29/3/2023 was obtained from RSPO.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	The maximum period ended in June 2023. However, Genting Plantations Berhad secured approval for a Time Bound Plan (TBP) deviation on 29/3/2023, extending the deadline until December 2025.	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?	Modifications to the Time Bound Plan have been integrated into the broader certification strategy and received formal approval from the Roundtable on Sustainable Palm Oil (RSPO) on 29/3/2023. The Annual Communication of Progress (ACOP) reporting has undergone thorough verification, as per following link: https://rspo.org/members/1-0086-06-000-00/	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapses observed since Genting has obtained approved TBP dated 29/03/2023 and still on track	Complied

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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 fundamental failure found since Genting has obtained approved TBP dated 29/03/2023 and still on track	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 accessible to the public on the RSPO website. Registered HCSA reports and Completed Peer Review Reports can be found 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.	<p>According to review, the completed Peer Reviewed HCV reports remain the same as below:</p> <p>PT Sawit Mitra Abadi: https://www.hcvnetwork.org/reports/hcv-pt-sawit-mitra-abadi-additional-1-000-ha-ketapang-regency-west-kalimantan-province-indonesia</p> <p>PT United Agro Indonesia: https://www.hcvnetwork.org/reports/hcv-in-the-permit-area-pt-united-agro-indonesia</p> <p>PT Agro Abadi Cemerlang: https://www.hcvnetwork.org/reports/hcv-concession-area-of-pt-agro-abadi-cemerlang-sanggau-regency-west-kalimantan-province-indonesia</p> <p>PT Kharisma Inti Usaha (KIU): https://www.hcvnetwork.org/reports/high-conservation-value-identification-pt-kharisma-inti-usaha</p> <p>PT Palma Agro Lestari Jaya: https://www.hcvnetwork.org/reports/hcv-pt-palma-agro-lestari-jaya-sintang-regency-west-kalimantan-indonesia</p> <p>PT Sepanjang Intisurya Mulia: https://www.hcvnetwork.org/reports/laporan-hcv-hcs-integrasi-di-areal-izin-penambahan-luasan-pt-sepanjang-intisurya-mulia-kabupaten-ketapang-provinsi-kalimantan-barat</p>	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	Based on RSPO RACP tracker, or Dispute Settlement Facility as per website, https://askrspo.force.com/Complaint/s/casetracker , there are no unresolved labor disputes.	Complied

	<p>In the event of any labor disputes, the company's established procedures would be applied.:</p> <p>Malaysian Operating Unit - SMP-GPB-19 Complaints and Grievances</p> <p>Indonesian Operating Unit - SOP - HRD-04-00.00 - Penyelesaian Keluh Kesah</p>	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<p>Based on RSPO Complaints System or Dispute Settlement Facility https://askrspo.force.com/Complaint/s/casetracker, there is no outstanding labour dispute. Should there be any, the following company's procedures applied:</p> <p><u>Indonesian Operating Unit</u> SOP - HRD-04-00.00 Penyelesaian Keluh Kesah</p> <p><u>Malaysian Operating Unit</u> SMP-GPB-19 Complaints and Grievances</p>	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance issue raised.	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, GPB's Sustainability Department conducted the internal audits in several dates January 2024 for the uncertified estates. Positive Assurance Statement for 2024 was made available for verification.	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 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.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	<p>Yes. The development of HCV documentation for the uncertified units involved the engagement of NGOs. Each HCV report for uncertified units has found engaged numerous of stakeholders such as communities, local authorities, and NGOs.</p> <p>For example, stakeholders involved in developing HCV report for PT United Agro Indonesia are:</p> <ol style="list-style-type: none"> 1. Islamic Scholars Council (MUI) 2. Kuala Kapuas Foundation 3. PT GAL Dadahup Village (Kapuas) 4. YIARI (Ketapang) 5. BOSF (Kapuas) 	Complied

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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.	There are no scheme smallholders or scheme outgrowers within the Certification Unit of Genting Sabapalm. Thus, this is not applicable.	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 July 2024	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,				

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of July 2024	Any unresolved non-compliances
12	Landworthy Sdn Bhd (84%)	Genting Landworthy Estate, Sabah, Malaysia				
13	Genting Tanjung Bahagia Sdn Bhd (100%) for estates	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah Oil Mill, Sabah, Malaysia	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		Oct, 2017	Certified	None

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of July 2024	Any unresolved non-compliances
		Mulia 5 & 6	Supply base for Mulia Oil Mill, Kalimantan, Indonesia			
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	Aug, 2023	Not certified	RaCP complete in October 2022.
26	PT United Agro Indonesia(60%)	PT UAI 1 & 2 UAI Plasma		Aug, 2023		
27	PT Susantri Permai (95%)	Puroh Estate Masaha Estate		Oct, 2025	Not certified	In the process of obtaining Forest Release and Forest

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of July 2024	Any unresolved non-compliances
		Zircon Hill Estate	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia			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	In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		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		In process of obtaining HGU HCSA report completed review. Report not published yet.
		AAC 3 & 4				
		Plasma – KSK1, KMB, BSL		Sept, 2025	Not certified	RaCP Process

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of July 2024	Any unresolved non-compliances
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.

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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 1 (One) Critical; 1 (One) Minor nonconformities and 1 (One) Opportunity For Improvement raised. The key in certification unit name 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 #	2534462-202408-M1	Issued Date	15/08/2024
Due Date	13/11/2024	Closure Date	03/10/2024
Indicator & Category (Critical / Minor)	3.6.2 – Critical		
Statement of Nonconformity:	Implementation of risk assessment and risk control is not effectively demonstrated.		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	<p>It was observed that there are unsafe observation and gaps in implementation of risk control at location as below:</p> <p><u>Genting Sabapalm Oil Mill</u></p> <ul style="list-style-type: none"> - At Loading Ramp, it was observed that workers stored their loading spikes by tucking them between the roof of their shelter, while other working tools were scattered around the area. - At the Scrap Iron Area, it was observed that the scrap metal collection area has become excessively high, and no control measure of risk has been implemented. <p><u>Genting Sabapalm Estate</u></p> <ul style="list-style-type: none"> - During the site visit to Field Block 22, it was observed that one worker was responsible for packaging decanter cake into empty bags for use as additional fertilizer. There are no risk control measure has been taken according to HIRARC documents 		
Corrections:	<p><u>Genting Sabapalm Oil Mill</u></p> <ul style="list-style-type: none"> - Build a suitable and safe sharps storage area and continuous training for workers in annual training programme - To chase the contractor to collect the scrap iron as soon as possible since the tender have been awarded to them. During waiting, safety measure such as erect barricade sign and stack the scrap iron to prevent dropping. <p><u>Genting Sabapalm Estate</u></p> <ul style="list-style-type: none"> - To conduct training of decanter cake handling and PPE training. 		

	<ul style="list-style-type: none"> - To monitor daily PPE checklist.
Root Cause Analysis:	<p><u>Genting Sabapalm Oil Mill</u></p> <ul style="list-style-type: none"> - There is no specific training regarding safe work procedures and also HIRARC to workers regarding the handling of sharp equipment in grading. - Less space for scrap metal storage and late dispose. <p><u>Genting Sabapalm Estate</u></p> <ul style="list-style-type: none"> - The estate management did not conduct Safety and Health inspection at packing decanter cake operation during the workplace inspection as it the ad-hoc work and just started on July 2024, while our last workplace inspection is in May 2024. Therefore, it is resulting lack of awareness to the appointed person about the risk of operation.
Corrective Actions:	<p><u>Genting Sabapalm Oil Mill</u></p> <ul style="list-style-type: none"> - Update the HIRARC (SP-MGR-01-FO1-1) and Procedure/SOP(GSOM-SOP-PRD-01) - Monitor the scrap iron quantity. Request for tender approval from HQ every year and to be disposed annually <p><u>Genting Sabapalm Estate</u></p> <ul style="list-style-type: none"> - To include decanter cake handling training in training matrix yearly. - To make sure that daily PPE monitoring checklist is updated by daily basis
Assessment Conclusion:	<p><u>Genting Sabapalm Oil Mill</u></p> <ul style="list-style-type: none"> - Evidence of training for Safe Working Procedure at Loading Ramp and briefing record of HIRARC (SP-MGR-01-FO1-1) updates on handling of sharp equipment at Grading Area were sighted on 14/08/2024 - A designated area for placing the loading spike during off-duty hours has been provided to reduce risks and hazards. - Evidence of disposal of 39.48 mt scrap iron by appointed vendor from 26/08/2024 to 29/08/2024 was sighted <p><u>Genting Sabapalm Estate</u></p> <ul style="list-style-type: none"> - Evidence of training record for decanter cake handling and PPE enforcement for involved worker was carried out on 26/08/2024 - Sighted evidence of daily PPE monitoring checklist for decanter cake handler has been conducted accordingly. <p>Thus, Major NC was closed on 03/10/2024</p>

Non-conformity			
NCR Ref #	2534462-202408-N1	Issued Date	15/08/2024
Due Date	Next Assessment Visit	Closure Date	"Open"

Indicator & Category (Critical / Minor)	7.3.2 – Minor
Statement of Nonconformity:	Implementation of waste management procedures is not adequately implemented
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.
Objective Evidence:	<p><u>Genting Sabapalm Estate</u></p> <p>Verification was conducted at the clinical waste store located at the back of the clinic, indicated that clinical waste (SW 404) was stored accordingly. However, there is no labelling observed providing information regards to generated date, name, address, telephone number, type of waste and scheduled waste code.</p> <p>This practice is in violation of the Scheduled Waste Management, Doc. No. SMP-GPB-11, Rev.02, updated September 2020, Clause 8.4- Labelling (Regulation, Third Schedule_ which stating that all scheduled waste containers shall be clearly labelled as well as Environment Quality Regulations (Scheduled Waste) 2005, under the Environmental Quality Act of 1974.</p>
Corrections:	The HA misunderstand the placement of the label, where she only places it prior to disposal date.
Root Cause Analysis:	To stick the label with relevant information as per regulation requirements.
Corrective Actions:	To conduct refresh training to the HA and her assistant to ensure they understand more as per SMP-GPB-11
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>2534462-202408-I1</p> <p><u>Indicator: 1.1.4</u></p> <p>Communication with the identified stakeholders could be improved by diversifying the channels used to ensure more effective information sharing.</p>

Positive Findings	
PF #	Description
PF 1	Good document retrieval
PF 2	Good commitment from the Management Team during the assessment
PF 3	Good establishment of signages around the estate and mill.

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2367634-202307-M1	Issued Date	13/07/2023
Due Date	13/10/2023	Closure Date	18/09/2023
Indicator & Category (Critical / Minor)	2.2.2 (Critical) - Escalated		
Statement of Nonconformity:	There is no mechanism to monitor compliance of legal requirement for contracted parties.		
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:	<u>Genting Sabapalm Estate</u> Verification to close minor non-conformities found out there is still business licenses that used address from other places. Details as per below 1. Man`znie Trading R41307/2020, Shops location: Lot 7, Block M Tingkat Bawah Bandar Letat Jaya, Batu 04, Jalan Lintas Utara, Sandakan. Due to reoccurrence of same issues for the same indicator, minor non-conformity have been escalated to critical non-conformity.		
Corrections:	Immediate meeting with sundry shop operators has been held on 13/07/2023. All of them has been given written reminder to settle their business licenses within one (1) month from the date of the letter issued. They also required to submit their copy of valid business licenses to estate management for physical verification on 14/08/2023. They will not be allowed to continue operating their business if their business licenses not complied as per Tenancy Agreement after verification.		
Root Cause Analysis:	No proper documentation maintain by the estate to ensure all required legal requirements complied by the sundry shop operator.		
Corrective Actions:	The PIC (Estate CC) will monitor the sundry shop operator tenancy agreement compliance on a yearly basis by using the tenancy and legal compliance checklist during the renewal of contract. If the sundry shop found not complied with the legal requirements and tenancy agreement, the contract will not renewed and new tender issued.		
Assessment Conclusion:	1. A meeting with sundry shop operators has been held on 13/07/2023, attended by 4 sundry shop owners and the management representatives. The attendance form was available for verification. 2. All of the sundry shop owners has been given written reminder to settle their business licenses within one (1) month from the date of the letter issued. The letter was issued dated 13/07/2023 and available for verification. 3. Maz`nie Trading has changed their legal name to Nur Aisyah Trading, effective 01/08/2023 as stated in the letter dated 01/08/2023 to the management. Therefore, Maznie Trading is now operating under the license name of NurAisyah Trading. Verified the Business License with License ID: BLN/2023/3321 (Groceries) and BLN/2-023/3320 (Food & Beverages) for Nur		

	<p>Aisyah Trading with premise located at Genting Sabahpalm Estate, dated 27/07/2023.</p> <p>4. The estate has established a “Tenancy Agreement Checklist” to monitor the sundry shop operator tenancy agreement compliance. Verified the tenancy Agreement Checklist for Nur Aisyah Trading dated 23/08/2023.</p> <p>Based on the implementation of the corrections and corrective action plans, it can be concluded that the raised non-conformity has been effectively addressed. Therefore the critical non-conformity is effectively closed on 18/09/2023.</p>																				
Effectiveness Closure (for previous audit closed Critical NC):	<p>The auditor has conducted stakeholder consultation during the audit and has invited Kedai Runcit Nuryani and Nur Aisyah Trading. Based on the interview, the owner informed they have updated their business licenses. The management will request all the sundry shop to provide all related business licenses during renewal of tenancy agreement every year.</p> <p>Evident the latest business licenses as below:</p> <table><tr><th>License/No</th><th>Name</th><th>Premise Address</th><th>Barang-barang Berjadual</th></tr><tr><td>Runcit/ GR12002465 Effective date: 23/01/2024</td><td>Kedai Runcit Nuryani</td><td>Genting Plantations Berhad, Genting Sabapalm Estate, P.O. Box 901, Sandakan Sabah, 90710 Beluran Sandakan, Sabah</td><td>Gas Petroleum Cecair (140kg)</td></tr><tr><td>Kedai Runcit/License ID: BLN/2016/710 Valid to 31/12/2024</td><td>Kedai Runcit – Catherine bt Jawani Pemilik bersama: Floriana Stanley Kiming</td><td>Kg. Bukit Tinggi Sabapalm, Sabah</td><td>nil</td></tr><tr><td>Kantin/Katering ID License: BLN/2023/3320 dated 29/01/2024</td><td>Nur Aisyah Trading menjalankan perniagaan makanan dan minuman</td><td>Genting Sabapalm Estate</td><td>nil</td></tr><tr><td>Kedai Runcit/ Membekal Barangan Runcit dan Pemborong LPG (Tong gas) secara runcit ID License: BLN/2023/3321 dated 29/01/2024</td><td>Nur Aisyah Trading – Runcit/Borong</td><td>Genting Sabapalm Estate</td><td>nil</td></tr></table>	License/No	Name	Premise Address	Barang-barang Berjadual	Runcit/ GR12002465 Effective date: 23/01/2024	Kedai Runcit Nuryani	Genting Plantations Berhad, Genting Sabapalm Estate, P.O. Box 901, Sandakan Sabah, 90710 Beluran Sandakan, Sabah	Gas Petroleum Cecair (140kg)	Kedai Runcit/License ID: BLN/2016/710 Valid to 31/12/2024	Kedai Runcit – Catherine bt Jawani Pemilik bersama: Floriana Stanley Kiming	Kg. Bukit Tinggi Sabapalm, Sabah	nil	Kantin/Katering ID License: BLN/2023/3320 dated 29/01/2024	Nur Aisyah Trading menjalankan perniagaan makanan dan minuman	Genting Sabapalm Estate	nil	Kedai Runcit/ Membekal Barangan Runcit dan Pemborong LPG (Tong gas) secara runcit ID License: BLN/2023/3321 dated 29/01/2024	Nur Aisyah Trading – Runcit/Borong	Genting Sabapalm Estate	nil
License/No	Name	Premise Address	Barang-barang Berjadual																		
Runcit/ GR12002465 Effective date: 23/01/2024	Kedai Runcit Nuryani	Genting Plantations Berhad, Genting Sabapalm Estate, P.O. Box 901, Sandakan Sabah, 90710 Beluran Sandakan, Sabah	Gas Petroleum Cecair (140kg)																		
Kedai Runcit/License ID: BLN/2016/710 Valid to 31/12/2024	Kedai Runcit – Catherine bt Jawani Pemilik bersama: Floriana Stanley Kiming	Kg. Bukit Tinggi Sabapalm, Sabah	nil																		
Kantin/Katering ID License: BLN/2023/3320 dated 29/01/2024	Nur Aisyah Trading menjalankan perniagaan makanan dan minuman	Genting Sabapalm Estate	nil																		
Kedai Runcit/ Membekal Barangan Runcit dan Pemborong LPG (Tong gas) secara runcit ID License: BLN/2023/3321 dated 29/01/2024	Nur Aisyah Trading – Runcit/Borong	Genting Sabapalm Estate	nil																		

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	1.Kedai Makanan Bermasak Islam 2.Kedai Makanan dan Minuman ID License: BLN/2020/1482 dated 21/01/2024	Warung Shema (Kedai dan Minum Bermasak Islam)	Genting Sabapalm Estate, Paitan Beluran, Sabah	nil	
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Previous Audit Minor Non-conformity			
NCR Ref #	2367634-202307-N1	Issued Date	13/07/2023
Due Date	Next Surveillance Assessment	Closure Date	15/08/2024
Indicator & Category (Critical / Minor)	4.2.3 – Minor		
Statement of Nonconformity:	Complaint received has not been responded in a timely manner.		
Requirement Reference:	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.		
Objective Evidence:	<p>Mechanism to lodge any complaint has been raised in the document number SMP-GPB-19 revision 05 issuance date June 2022 title "Sustainability management Procedure manual", 3.0, complaints and grievances handling procedure. Stated in the procedure that the time timeframe for the action taken depend on the seriousness of the complaint or grievance. It also mentioned that accepted time frame to acknowledge and respond to the complaint (s) is within 1 month's period.</p> <p>During the workers representative meeting for Genting Sabapalm POM conducted on 23/03/2023, the management received complaint from the workers representative on damage of septic tank at one of the sundry shops and the waste flow to the drainage at the POM workers quarters. All sundry shops are under Genting Sabapalm Estate management and request was sent by Genting Sabapalm POM on 21/03/2023 to Genting Sabapalm Estate to repair the septic tank, prior to the meeting.</p> <p>Further verification done by the auditor during the site visit, found out that the issues have not been resolved and it has been confirmed through interview with the sundry shops' owner and the complainer that they have not been updated on the progress of the complaint.</p> <p>Verification at the estate found out that order has been placed on 01/07/2023 based on purchase order reference number ASPEP15388 with total amount RM 2,808.40. Thus, the timeframe taken by the management to respond to this issue, exceeded the 1-month period, as stated in the SOP.</p>		
Corrections:	The complainer and sundry shop operator has been immediately informed on the progress of the issue on 12.7.2023. The septic tank also delivered on the same day and replacement of the damage septic tank and piping works has been completed on 22.7.2023. The completion work has been documented and acknowledged by		

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	the complainer.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Estate is aware of the issue and has sent own carpenter to do inspection and evaluation of the cost involved to repair or replace the septic tank of the respective sundry shop in the beginning of April 2023 but the action has not been documented in order to respond the request dated on 21.03.2023 to respective complainer as per SMP-GPB-19 revision 05. 2. Lack of communication and follow up between shop operator and estate management while obtaining quotation to replace the damage septic tank coupled with temporary change in management. Due to the SEM overseeing the estate at that point, information on the subject was not communicated to the returning manager, of which approval would be required by the General Manager. This also caused the issue taking a longer period of time to respond as the issue involve high amount of cost.
Corrective Actions:	<ol style="list-style-type: none"> 1. Dedicate PIC (Assistant Manager) will be appointed and train to handle all complaint, grievances and enquiries as well as risk management. 2. PIC in charge of social and risk management has been given training on 15/07/2023.
Assessment Conclusion:	<p>Verification on previous complaint confirmed that the repaired has been done on 31/07/2024 as recorded in the Complaint/Enquiry Form signed and acknowledged by the complainant. The complainant also has been invited for consultation during audit for further clarification.</p> <p>Additionally, sighted appointment letter for Assistant Manager by Manager as person who responsible to attend all complaints, grievances, and enquiries from stakeholders as per Complaints and Grievances Handling Procedure, Doc. No. SMP-GPB-19, Rev. 05, dated June 2022. Training regards to the procedure also has been provided and re-briefed by Sustainability Department from HQ on 15/07/2023 with pictorial evidence, materials of training as well as evaluation of training effectiveness.</p>

Previous Audit Minor Non-conformity			
NCR Ref #	2367634-202307-N2	Issued Date	13/07/2023
Due Date	Next Surveillance Assessment	Closure Date	15/08/2024
Indicator & Category (Critical / Minor)	3.3.2 – Minor		
Statement of Nonconformity:	The spillage of diesel located at Genting Sabapalm POM was not properly handled, contained from entering drain and adjacent effluent pond as SDS dated 04/10/2019.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<ol style="list-style-type: none"> 1. Found spillage of diesel mark on soils at skid tank storage located in Genting Sabapalm POM and later covered with soils. 2. SDS sampled for Diesel. Petronas Diesel Euro 5 (B7) Released 04/10/2019. Section 16: Accidental release measures stated Prevent product from entering drain as environmental precautions. Contain spillage and then collect with non-combustible absorbent materials (e.g. Earth, sand, diatomaceous earth, vermiculite). 		

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	Standard Operating Procedure (SOP) Rev.03, dated 11/10/2013 under Steps in managing and handling fuel could be further improved explaining method to handle and contain spillage.
Corrections:	<ol style="list-style-type: none"> 1. Training on managing and handling fuel to respective PIC 2. The diesel spillage on the soil was contained and collected with sand filled in the empty fertilizer bag. 3. The contaminated soil was sent to schedule waste store. <ul style="list-style-type: none"> - To further improve the SOP Rev.03, date 11/10/2013 under Steps in managing and handling fuel.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. No proper spillage containment kit was available 2. Oil trap is too small
Corrective Actions:	<ol style="list-style-type: none"> 1. Estate to ensure PIC are well trained and understand on managing and handling fuel spillage as per SDS and revised SOP. 2. Oil trap will be increased in size. <ul style="list-style-type: none"> - To review the Standard Operating Procedure (SOP) Rev.03 dated 11/10/2013 under Steps in managing and handling fuel (contain spillage).
Assessment Conclusion:	<p>Verification of corrective actions confirmed the following has been effectively implemented:</p> <ul style="list-style-type: none"> - Improved diesel containment in Genting Sabapalm Oil Mill (GSOM) for use of both Genting Sabapalm Oil Mill (GSOM) and Genting Sabapalm Estate (GSPE) - Availability of spill kits in diesel skid tank containment as well as lubricant store, vehicle parking area and workshop - Revised SOP Rev. 4 of Steps in managing and handling fuel (contain spillage) - Latest Safe Operating Procedure & Environmental Control Procedure (SOP & ECP) training; Date: 27/03/2024. Sighted training understanding evaluation documents for attendees and found to be sufficient to conclude effectiveness of the training. <p>Visit confirmed no recurrence with evidence verified above. Hence, Minor Nonconformity closed on 15/08/2024.</p>

Previous Audit Minor Non-conformity			
NCR Ref #	2367634-202307-N3	Issued Date	13/07/2023
Due Date	Next Surveillance Assessment	Closure Date	15/08/2024
Indicator & Category (Critical / Minor)	7.8.3 – Minor		
Statement of Nonconformity:	Effects of mill effluent discharge were not adequately monitored.		
Requirement Reference:	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.		
Objective Evidence:	In regard to the Mill Effluent management, the DOE Compliance Schedule has required for river water quality monitoring to be done by establishing 2 sampling		

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	<p>points, approved by DOE, at the upstream and downstream, to monitor the impacts of effluent discharge to the nearest water bodies.</p> <ol style="list-style-type: none"> 1. There was no evidence that the established sampling points at the downstream and upstream obtained approval from DOE. 2. The established upstream sampling point was after the "Environmental Impact Point" and not before as required to monitor the difference in river water quality via water sampling.
Corrections:	Send a letter to Ketua Pengarah Jabatan Alam Sekitar on the proposed location for upstream and downstream sampling points for his approval.
Root Cause Analysis:	Management was not aware of the requirement of the sampling points to be approved by DOE.
Corrective Actions:	Due to frequent changes in the mill management team, dedicated PIC at regional office have been appointed to monitor mills permits, legal requirements as well as KB compliance and update any changes if any.
Assessment Conclusion:	<p>Verification of corrective actions confirmed the following has been effectively implemented:</p> <ul style="list-style-type: none"> - Letter to DOE and Certificate of Analysis # E240730-07-0; Lab Ref. # E240730/07A-07C; Sampling date: 30/07/2024; Report date: 08/08/2024 for sample marking (descriptions) as following: A: Upstream Labuk River – BOD <2 B: Downstream Labuk River – BOD <2 C: POME Final Discharge Facultative Pond # 2 – BOD: 82.4 - Environmental Compliance Audit Report (Third Party Audit by RehPro Jupri Bin Mohd. Bani; EA0157; CISEC MY-1011) for Genting Oil Mills (Sabah) Sdn. Bhd.; Audit tracking # JAS.SSK.600-3/1/3/01/2024; Report Ref. # RNK/JB/ECA/2024-010; Result: 0 NC + 5 Observations. Previous Environmental Compliance Audit (Third Party Audit by The Best Solution Mohd. Hairimi Bin Mohd. Ali; EA0101; CESSWI 3756) Report Ref. # AUDIT/JP/GSOM/12/05/2023; Audit date: 12/05/2023; Report date: 16/05/2023; DOE Audit tracking # ASSH(B)31/152/000/014/AUDIT2023/1 (005261); Result: 2 AFI + 4 Observations - Identified PIC as per letter of Appointed Management Representative for ISCC, RSPO and MSPO Related Matters; Date: 26/06/2024 of Mill Manager by Assistant Vice President - Processing (Malaysia). <p>Visit confirmed no recurrence with evidence verified above. Hence, Minor Nonconformity closed on 15/08/2024.</p>

Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	<p>2367634-202307-I1</p> <p><u>Indicator: 6.5.3</u></p> <p>Checklist for new mother assessment can be further improved by identifying relevant questions included in the checklist base on the timing of assessment to obtain more information on new mothers need.</p>

	<p>Verification / Follow-up actions:</p> <p>It has been verified that new mother assessment has been conducted with interview session and relevant questions were prepared according to checklist base. The questions based on checklist provide more coverage and details on new mother needs.</p>
OFI 2	<p>2367634-202307-I2</p> <p><u>Indicator: 3.6.1</u></p> <p>The HIRARC to be further improved to ensure all developed HIRARC to be consistent with the new formats, as per HIRARC New Risk Management Regulations.</p> <p>Verification / Follow-up actions:</p> <p>There is evidence that that HIRARC documents has been prepared with new format as per HIRARC New Risk Management Regulations.</p>
OFI 3	<p>2367634-202307-I3</p> <p><u>Indicator: 7.2.10</u></p> <p>The planning to conduct the Annual Medical Surveillance for each chemical handlers could be further enhanced.</p> <p>Verification / Follow-up actions:</p> <p>Based on medical surveillance conducted for mill and estate in 2024, it was concluded that each chemical handlers were involved and advance planning has been made with appropriate list of chemical handlers and Occupation Health Doctor (OHD) appointment.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1929260-202007-M1	Critical	2.3.1	09/07/2020	Closed out on 05/10/2020
1929260-202007-M2	Critical	4.1.1	09/07/2020	Closed out on 05/10/2020
1929260-202007-M3	Critical	6.2.3	09/07/2020	Closed out on 05/10/2020
1929260-202007-M4	Critical	6.5.2	09/07/2020	Closed out on 05/10/2020
1929260-202007-N1	Minor	1.1.5	09/07/2020	Closed out on 02/06/2021
1929260-202007-N2	Minor	3.3.2	09/07/2020	Closed out on 02/06/2021
1929260-202007-N3	Minor	3.4.2	09/07/2020	Closed out on 02/06/2021
1929260-202007-N4	Minor	3.5.1	09/07/2020	Closed out on 02/06/2021
1929260-202007-N5	Minor	5.2.2	09/07/2020	Closed out on 02/06/2021
1929260-202007-N6	Minor	6.5.3	09/07/2020	Closed out on 02/06/2021
1929260-202007-N7	Minor	7.11.3	09/07/2020	Closed out on 02/06/2021
2189110-202204-M1	Critical	2.1.1	15/04/2022	Closed out on 15/07/2022
2189110-202204-M2	Critical	3.6.1	15/04/2022	Closed out on 15/07/2022

2189110-202204-N1	Minor	2.2.2	15/04/2022	Escalated to Critical NC
2189110-202204-N2	Minor	2.2.3	15/04/2022	Closed out on 13/07/2023
2189110-202204-N3	Minor	3.4.2	15/04/2022	Closed out on 13/07/2023
2367634-202307-M1	Critical	2.2.2	13/07/2023	Closed out on 18/09/2023
2367634-202307-N1	Minor	4.2.3	13/07/2023	Closed out on 15/08/2024
2367634-202307-N2	Minor	3.3.2	13/07/2023	Closed out on 15/08/2024
2367634-202307-N3	Minor	7.8.3	13/07/2023	Closed out on 15/08/2024
2534462-202408-M1	Major	3.6.2	15/08/2024	Closed out on 03/10/2024
2534462-202408-N1	Minor	7.3.2	15/08/2024	"Open"

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 Sabapalm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace. 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)
Smallholder/FFB Supplier	En. Jamil Ampak, Kg Kolagan Pn Saluma Kundur, FFB Supplier	Face to Face
Government	Klinik Kesihatan Tagas-Tagas	Face to Face
Government	Balai Polis Tagas-Tagas	Face to Face
Government	SK Ladang Sabapalm	Face to Face
Communities	Kg Klagan	Face to Face
Vendor	Sundry Shop – Kedai Runcit Nuryani	Face to Face
Vendor	Canteen - Nur Aisyah Trading	Face to Face

Stakeholders comment	
1	Feedbacks: Smallholders There is agreement and FFB rates and referred to MPOB price. No issue on payment and the representative from Kg Klagan also one of the FFB supplier and has sent FFB since 2007.
	Audit Team verification and response: The management always maintain the close relationship with local communities. No further verification required.
2	Feedbacks: Klinik Kesihatan Tagas-Tagas There are 10-20 persons from Genting Sabapalm have received treatment (both local and foreign workers) for pregnancy check-ups and illnesses such as high blood pressure, diabetes, etc. Prioritize emergency cases for foreigners if they don't have enough money.
	Audit Team verification and response: The management always maintain the close relationship with government agencies and local communities. No further verification required.
3	Feedbacks: Balai Polis Tagas-Tagas Usually there is no criminal issue related to Genting Sabapalm workers, just receive reports of fights between local people and rarely for foreigners. No drug issues. The Mill helps to deliver water for the use of police stations in Tagas-Tagas (>50%).
	Audit Team verification and response: The management always maintain the close relationship with government agencies and local communities. No further verification required.
4	Feedbacks: SK Ladang Sabapalm There are 102 students, approximately 80% come from Genting Sabah Palm Oil Mill and Estate. There is always assistance and donations from the estate and mill in terms of gift donations for school events, materials, black soil from the mill, the welfare of staff, helping to make ditches, repairing schools and teachers' houses. The teacher lives in the estate area opposite the housing of the mill quarters. And the school is also in the estate compound.
	Audit Team verification and response: The management always maintain the close relationship with government agencies and local communities. No further verification required.
5	Feedbacks: Kg Klagan There is no operation or activities of the Genting Sabapalm Oil Mill and Estate. There are residents who work in mill and estate. The village representative also one of the FFB suppliers to Genting Sabapalm Oil Mill.
	Audit Team verification and response: The management always maintain the close relationship with local communities. No further verification required.
6	Feedbacks: Sundry Shop – Kedai Runcit Nuryani and Canteen - Nur Aisyah Trading No issues arise, all vendors were provided with contract agreement. The vendor will meet the manager directly when needed. The sundry shop and canteen vendor rented the shop from the management with appropriate rate and all the repairs will be covered by the management. The sundry shop and canteen were required to give the copy of business licenses and permits to the estate for monitoring.

Audit Team verification and response:

The management always maintain the close relationship with vendor and suppliers. No further verification required.

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
<p>Based on comprehensive desktop studies, documentation reviews, and records reviews, there is no evidence of land ownership by other users or any customary rights associated with the land currently under oil palm operations. The Unit of Certification is in its third generation of planting, with the current landowner holding the property for over 25 years. A review of the complaint and grievance records during audits confirms that there have been no issues related to land conflict involving this Unit of Certification. Furthermore, interview records from previous and current assessments, including those with local communities, as maintained by BSI MY, indicate that there are no ongoing or historical conflicts related to the land in question.</p> <p>As a precaution, the CB maintains a mechanism to identify and consult any interested parties should any claims or rights be identified in the future. This includes keeping track of all consultations conducted during the certification cycle to ensure comprehensive coverage.</p>					

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

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Genting Oil Mill (Sabah) Sdn Bhd – Genting Sabapalm 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 Oil Mill (Sabah) Sdn Bhd – Genting Sabapalm Oil Mill is remain certified.</p>		
Report prepared by	Acceptance of Assessment Conclusion	
Name: Fahmi Bin Othman	Name: James Chung Khim Hon	Name: Abdull Rahim Wilson Abdullah
Company Name: BSI Services Malaysia Sdn. Bhd	Company Name: Genting Oil Mills (Sabah) Sdn Bhd	Company Name: Genting Plantations Berhad
Title: Client Manager	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: 15/10/2024	Date: 23/10/2024	Date: 23/10/2024

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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>The management has established the Procedure on Requests and Responses (Doc No.: SMP-GPB-25).</p> <p>Under 4.1.4: Documents listed as Publicly available:</p> <ol style="list-style-type: none"> 1. Company Annual Report 2. Company Sustainability Report 3. Group Policies 4. Reports related i.e.: EAI (Environmental Aspect Impact Assessment), EIA (Environment Impact Assessment) 5. RSPO External Audit reports 6. Pollution Prevention & Reduction Plan 7. Continuous Improvement Plan 8. Complaints and Grievances details & procedure 9. Negotiation and Compensation procedure 10. Sexual Harassment procedure 11. Social Management Plan 12. OSH Management Plan <p>This procedure has been communicated to all stakeholder during muster and visitor's briefings, meetings, and through notice boards as per 1.1.4.</p>	Complied

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1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	<p>The management has established Procedure for Consultation and Communication (Doc No: SMP-GPB-17, Rev: 04, Issue date 15/04/2024).</p> <p>Procedures and Responsibilities for Implementation</p> <p>5.1 Communication and consultation mechanism should be design in collaboration with workers, local communities and other affected or interested stakeholders. These should consider the use of appropriate and existing local mechanisms, the national language and the use of translator.</p> <p>Evident that all information has been provided in Bahasa Malaysia and English. It has been verified based on the document review. As per verification, all document that classified as publicly available has been documented in Bahasa Malaysia and English. As per stated in the consultation and communication procedure, explanation will be given by the person in charge if the requester is using other than Bahasa Malaysia and English.</p>	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	Evident the records of appropriate action taken in response to input from internal and external stakeholders meeting conducted on 06/06/2024 and 11/07/2024 as elaborated in 1.1.4 such as type of contribution to community, permission for using estate roads, road maintenance, security patrolling, maintenance of wooden worker quarters, jetty lighting, jetty extension (dry season), etc.	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	<p>The management has established Procedure for Consultation and Communication (Doc No: SMP-GPB-17, Rev: 04, Issue date 15/04/2024).</p> <p>Procedures and Responsibilities for Implementation</p>	OFI

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		<p>5.1 Communication and consultation mechanism should be design in collaboration with workers, local communities and other affected or interested stakeholders. These should consider the use of appropriate and existing local mechanisms, the national language and the use of translator.</p> <p>5.6 The meeting shall be carried out at least half yearly for internal stakeholders and annually for external stakeholders or when necessary.</p> <p>5.9 Following are topics or issues that shall be discussed (but not limited to):</p> <ol style="list-style-type: none"> 1. Relationship with the company 2. Opportunities for employment 3. Participation in decision making 4. Provision of housing, sanitation, amenities and educational support 5. Pay, conditions, facilities, safety and trainings 6. Forced labour issue relating to the 11 ILO Indicators 7. Medical and health facility 8. Social issues – discrimination, sexual harassment and road access facility etc. 9. Land issues 10. Complaints and grievances 11. Company approach to community development 12. FPIC 13. Environmental protection and pollution prevention plan 14. Biodiversity conservation and wildlife protection 	
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		<p>15. Suggestion for improvement</p> <p>Under clause 6.1: OUs shall communicate the following flowchart with their stakeholders for comments. This can be done during routine stakeholder meeting via email or postage.</p> <p><u>Genting Sabapalm Oil Mill</u></p> <p>Stakeholders meeting with Smallholders (External) for Genting Sabapalm Oil Mill has been conducted on 1406/2024 attended by Mill Manager, Marketing Manager, Sustainability Department, Sr Assistant Genting Sabapalm Estate (GSPE), Document Controller GSOM, Mill Engineer GSOM, and smallholders (Zurinah Abah, Rossledy A/K Jus Bowen, Norlena Tangkawang (David Jais Rep), En Maika Ibau, Luaren Jais, Mursalim Hattamu (Dragon Villa Rep), and Ismail Marupu (Tang Hong Piau rep).</p> <p>The previous External Stakeholders consultation FY 2023 at Kelab Labuk Genting Sabapalm Estate (GSPE) on 11/04/2023 attended by Genting Sabapalm Estate (GSPE) Manager and Assistant Manager GSPO Manager, Ketua Kg Tagas-tagas, Ketua Kg. Klagan, JPPK Kg. Bambang, SK Tagas-tagas, SMK Pamol, Palm Mach Sdn Bhd, ICP Agro Solution, Assistant Manager Pamol Estate, Klinik Kesihatan Tagas-tagas, etc.</p> <p>The training to all workers as per checkroll on QESH & Sustainability Policy on 19/03/2024 at GSOM Muster Area that covered Quality Policy, Environment Policy, Occupational Safety and Health Policy, Sustainability Policy, Human Policy, Sexual Harassment Policy, Zero</p>	
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		<p>Burning Policy, Ethical Conduct and Integrity Policy, Social Policy and Food Safety Policy.</p> <p><u>Genting Sabapalm Estate</u></p> <p>External Stakeholder Consultation Meeting FY2024 has been conducted on 11/07/2024 at Kelab Labuk, GSPE attended by 21 person such as Manager, Assistant Manager and staff of GSPE, Auxiliary Police of GSPE, Warden Jemaat St Paul (church), Medical Assistant Klinik Kesihatan Tagas- Tagas, JKKK Kampung Tagas-Tagas, SK Ladang Sabapalm, HUMANA teacher, OCS Police Station Tagas-Tagas, Ancom Crop Care, SMK Pamol, SK Tagas-Tagas dan SK Ladang Sabapalm. Part of the agenda covered safety briefing, introduction, approval of 2023 minutes meeting, briefing on MSPO, RSPO, ISCC, and OSH, any matters arising. All matter arising has been discussed and appropriate actions have been taken.</p> <p>Training on company policies has been conducted on 07/02/2024 and 16/02/2024 covered Quality Policy, Environment Policy, Occupational Safety and Health Policy, Sustainability Policy, Human Policy, Sexual Harassment Policy, Zero Burning Policy, Ethical Conduct and Integrity Policy, Social Policy and Food Safety Policy.</p> <p><u>Genting Sabapalm Oil Mill and Genting Sabapalm Estate</u></p> <p>Internal Stakeholders Consultation has been conducted on 06/06/2024 at Kelab Labuk, Genting Sabapalm Estate attended by Estate Manager and Assistant Manager, Mill Manager, Chief Clerk (Gender Committee), Sustainability GSPE, Auxiliary Police, Welfare Committee Chairman, Liong Enterprise, Warung Shema, Kedai Nurani, Dinamik Enterprise, Syarikat CM, Hon Kim Enterprise,</p>	
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		<p>Syarikat Tan Hong Transport, Syarikat Abadi Maju, Nur Aisyah Trading and AAA Unit.</p> <p>OFI</p> <p>Communication with the identified stakeholders could be improved by diversifying the channels used to ensure more effective information sharing.</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 mill and estates have maintained the List of Stakeholders FY 2024 includes categorized as Contractors, Vendors/Suppliers, Local Community and Other Interested Parties (Government Agencies, School, Hospitals, Balai Polis, Village, OCP, NGO, etc.).</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>The management has established the Ethical Conduct and Integrity Policy approved by President & Chief Operating Procedure dated 22/06/2015. Genting Plantations is committed to always conduct its business ethically and with integrity. All employees of the Group are expected to adhere to the following values:</p> <ol style="list-style-type: none"> 1. Respect for fair conduct of business 2. Refrain from all forms of corruption, bribery and fraudulent use of funds and resources 3. Full, fair, accurate and timely disclosure of relevant facts in all reports and documents dealings with applicable regulations and laws 4. Respect and protect confidential and or privileged information to which we have access in the course of our duties. 	Complied

		<p>Every employee is accountable for adherence to this policy and to report violations or suspected violations. This policy operates in conjunction with out Whistleblower Policy.</p> <p>The training to all workers as per check roll on QESH & Sustainability Policy on 19/03/2024 at Genting Sabapalm Oil Mill Muster Area that covered Quality Policy, Environment Policy, Occupational Safety and Health Policy, Sustainability Policy, Human Policy, Sexual Harassment Policy, Zero Burning Policy, Ethical Conduct and Integrity Policy, Social Policy and Food Safety Policy.</p> <p>Evident the samples of PK Transport Agreement dated 01/08/2023 between Genting Oil Mills (Sabah) Sdn Bhd and Juita Baru Sdn Bhd valid till 31/07/2025.</p> <p>The transporters and contractors shall ensure compliance with the requirements on RSPO, MSPO and ISCC. The transporters and his employees shall be aware of existing company policies including Ethical and Integrity Policy.</p>	
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>System to monitor compliance and the implementation of the policy established through the finance internal audit RSPO/MSPO conducted by internal audit department (IAD) on 12/07/2024. There are no issues on ethical conduct has been raised.</p>	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad diligently monitored compliance with permits and licenses, with oversight from the operating units and the sustainability team. Respective operating units will undertake</p>	Complied

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		<p>the responsibility of identifying, managing, updating, and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p><u>Genting Sabapalm Oil Mill</u></p> <table><tr><th>License / Permit</th><th>Reference</th><th>Validity Date</th></tr><tr><td>MPOB License</td><td>620051004000</td><td>28/02/2025</td></tr><tr><td>Permit Barang Kawalan Berjadual – Diesel (Euro 2M)</td><td>KPDNHEP.SDN. 18/2021 (SK)</td><td>29/09/2024</td></tr><tr><td>Power Air Compressor</td><td>PMT-SB/20 34117</td><td>16/06/2025</td></tr><tr><td>Sterilizer 1</td><td>PMT-SB/20 36506</td><td>16/06/2025</td></tr><tr><td>Sterilizer 2</td><td>PMT-SB/20 36506</td><td>16/06/2025</td></tr><tr><td>Boiler No. 3</td><td>APU2. (D40/82/2002)</td><td>13/06/2025</td></tr><tr><td>Monorail Host Crane No.1</td><td>SB PMA 53/PMT-SB/20 36507</td><td>16/06/2025</td></tr></table>	License / Permit	Reference	Validity Date	MPOB License	620051004000	28/02/2025	Permit Barang Kawalan Berjadual – Diesel (Euro 2M)	KPDNHEP.SDN. 18/2021 (SK)	29/09/2024	Power Air Compressor	PMT-SB/20 34117	16/06/2025	Sterilizer 1	PMT-SB/20 36506	16/06/2025	Sterilizer 2	PMT-SB/20 36506	16/06/2025	Boiler No. 3	APU2. (D40/82/2002)	13/06/2025	Monorail Host Crane No.1	SB PMA 53/PMT-SB/20 36507	16/06/2025	
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		Jadual Pematuhan Alam Sekitar	05261	30/06/2025	
		Lesen bagi Pepasangan Persendirian	59942/2023/00133	21/03/2025	
		Weighbridge Calibration	5106/L115-30 MT	06/06/2025	
		Permit for hiring foreign workers	200601002661	28/09/2024	
		<u>Genting Sabapalm Estate</u>			
		License / Permit	Reference	Validity Date	
		MPOB License	523495002000	31/12/2024	
		Permit Barang Kawalan Berjadual – Petrol 95 (200 liter/day)	KPDNHEP.SDK.100/2021(PK)	20/09/2024	
		Sabah Small Ship Licence	BN-1598/7/P	29/09/2024	
		DOSH Permit (Air Compressor Receiver)	PMT-SB/2365340	17/10/2024	

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		<table><tr><td>Permit for hiring foreign workers</td><td>JTK.H.SDK.600 - 4/1/1/01261/0 05604</td><td>01/10/2024</td></tr><tr><td>Licence for Workers Wages Deduction</td><td>JTKSBH/PMT/1 13/2021/0400</td><td>11/03/2026</td></tr></table>	Permit for hiring foreign workers	JTK.H.SDK.600 - 4/1/1/01261/0 05604	01/10/2024	Licence for Workers Wages Deduction	JTKSBH/PMT/1 13/2021/0400	11/03/2026	
Permit for hiring foreign workers	JTK.H.SDK.600 - 4/1/1/01261/0 05604	01/10/2024							
Licence for Workers Wages Deduction	JTKSBH/PMT/1 13/2021/0400	11/03/2026							
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Genting Plantations Berhad diligently monitored compliance with permits and licenses as per Sustainability Management Procedure Manual, Legal Requirement Register, Doc. No. SMP-GPB-22, Rev. 13, last updated on 15/04/2024.</p> <p>All legal requirements were documented in Legal Requirement Register, Doc. No. SMP-GPB-22 available at the estate and mill. The register is reviewed regularly and updated as and when there are new or amended legal requirements that are applicable to the estate operations. The content of the legal register summarize below:</p> <p>1. List of local legal requirements applicable to plantation and mill operations in Malaysia and East Malaysia.</p> <p>2. List of international standards/requirements applicable to plantation operation in Malaysia:</p> <ul style="list-style-type: none">• Part 1: Environment• Part 2: Safety and Health• Part 3: Social• Part 4: Best Practices and other requirements• Part 5: International Standards/Requirement	Complied						

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2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	<div>Estate's maps clearly showing the estates boundary while Palm Oil Mill's border marked through the fencing of the mill area.</div> <div>The demarcation at estate was by using concrete pegging and boundary trenching. Site visit confirmed at P103H and P12 that boundary packs (Red Poled) available along the perimeter boundary. There was no evidence of plantings beyond the perimeter boundary as verified during the site visit at the boundary area. Verified location of boundary stone at location:</div> <table><tr><td>Estate</td><td colspan="2">Location</td></tr><tr><td rowspan="2">Genting Sabapalm Estate</td><td>5°58'11.5"N</td><td>117°23'02.8" E</td></tr><tr><td>5°54'31.3"N</td><td>117°23'31.1" E</td></tr></table>	Estate	Location		Genting Sabapalm Estate	5°58'11.5"N	117°23'02.8" E	5°54'31.3"N	117°23'31.1" E	Complied
Estate	Location										
Genting Sabapalm Estate	5°58'11.5"N	117°23'02.8" E									
	5°54'31.3"N	117°23'31.1" E									
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.											
2.2.1	A list of contracted parties is maintained. - Minor compliance -	Genting Sabapalm Oil Mill and Sabapalm Estate's management has maintained a list of contracted parties, which is documented in the List of Stakeholders. Among contracted parties listed are JXXXX BXXX Sdn Bhd, CXXXX SXX MXX Trading Sdn Bhd, AXXXX Bin AXXXXX and HXX XXX Enterprise . The list includes List of Customer, List of Supplier, Local Community Heads, Neighbours, Local Authorities, Union Associations, Foreign Country Embassies, and Vendors which (Contractors & Suppliers).	Complied								
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.	Genting Plantations Berhad has established very specific agreement contracts for appointed contractor and FFB suppliers. The contracts were available for verification for all contracted parties with the mill and estate which contains specific clause on meeting applicable	Complied								

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Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	<p>legal requirements to them, disallowing young/child/forced/trafficked labour with protection clause should be made in place. Verified documents sample of contractors and FFB Suppliers as table below:</p> <table><tr><th>Unit of Certification</th><th colspan="2">Sample of Contractor</th></tr><tr><td rowspan="4">Genting Sabapalm Oil Mill (GSOM)</td><td rowspan="2">CPO & PK Transporter</td><td>JXXXX BXXX Sdn Bhd</td></tr><tr><td>CXXXX SXX MXX Trading Sdn Bhd</td></tr><tr><td rowspan="2">FFB Supplier</td><td>AXXXX Bin AXXXXX</td></tr><tr><td>ZXXXXX MXXXXXX</td></tr><tr><td>Genting Sabapalm Estate (GSPE)</td><td>Loading & Transport FFB and Loose Fruit</td><td>HXX XXX Enterprise</td></tr></table> <p>While for recruitment agencies, there is implementation of Foreign Workers Ethical & Responsible Recruitment Procedures, outlined in Document Number GEN-13, Revision 06, issued on 17/10/2023. 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</p>	Unit of Certification	Sample of Contractor		Genting Sabapalm Oil Mill (GSOM)	CPO & PK Transporter	JXXXX BXXX Sdn Bhd	CXXXX SXX MXX Trading Sdn Bhd	FFB Supplier	AXXXX Bin AXXXXX	ZXXXXX MXXXXXX	Genting Sabapalm Estate (GSPE)	Loading & Transport FFB and Loose Fruit	HXX XXX Enterprise
Unit of Certification	Sample of Contractor													
Genting Sabapalm Oil Mill (GSOM)	CPO & PK Transporter	JXXXX BXXX Sdn Bhd												
		CXXXX SXX MXX Trading Sdn Bhd												
	FFB Supplier	AXXXX Bin AXXXXX												
		ZXXXXX MXXXXXX												
Genting Sabapalm Estate (GSPE)	Loading & Transport FFB and Loose Fruit	HXX XXX Enterprise												

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		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.														
2.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Genting Plantations Berhad has established very specific agreement contracts for appointed contractor and FFB suppliers. The contracts (Third Party Acknowledgement Letter, Related Party Disclosures by Business Associates and Code of Business Conduct for Third parties) were available for verification for all contracted parties with the mill and estate which contains specific clause on meeting applicable legal requirements to them, disallowing young/child/forced/trafficked labour with protection clause should be made in place. Verified agreement for sample of contractors and FFB Suppliers as table below:</p> <table><tr><th>Unit of Certification</th><th colspan="2">Sample of Contractor</th></tr><tr><td rowspan="4">Genting Sabapalm Oil Mill (GSOM)</td><td rowspan="2">CPO & PK Transporter</td><td>JXXXX BXXX Sdn Bhd</td></tr><tr><td>CXXXX SXX MXX Trading Sdn Bhd</td></tr><tr><td rowspan="2">FFB Supplier</td><td>AXXXX Bin AXXXXX</td></tr><tr><td>RXXXXX Bin JXXX</td></tr><tr><td>Genting Sabapalm Estate (GSPE)</td><td>Loading & Transport FFB and Loose Fruit</td><td>HXX XXX Enterprise</td></tr></table>	Unit of Certification	Sample of Contractor		Genting Sabapalm Oil Mill (GSOM)	CPO & PK Transporter	JXXXX BXXX Sdn Bhd	CXXXX SXX MXX Trading Sdn Bhd	FFB Supplier	AXXXX Bin AXXXXX	RXXXXX Bin JXXX	Genting Sabapalm Estate (GSPE)	Loading & Transport FFB and Loose Fruit	HXX XXX Enterprise	Complied
Unit of Certification	Sample of Contractor															
Genting Sabapalm Oil Mill (GSOM)	CPO & PK Transporter	JXXXX BXXX Sdn Bhd														
		CXXXX SXX MXX Trading Sdn Bhd														
	FFB Supplier	AXXXX Bin AXXXXX														
		RXXXXX Bin JXXX														
Genting Sabapalm Estate (GSPE)	Loading & Transport FFB and Loose Fruit	HXX XXX Enterprise														

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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>For directly sourced FFB, detailed information about third-party FFB suppliers including smallholders is meticulously documented and maintained. This includes contract agreements that outline the terms and conditions of the supply, MPOB licenses that verify the suppliers' compliance with regulatory standards, and location maps complete with GPS coordinates to accurately identify the sourcing locations. Additionally, evidence of ownership is also kept, ensuring transparency and traceability in the supply chain. All this information is systematically organized and available for review.</p> <p>Sample of details of estates and smallholders as follows:</p> <ol style="list-style-type: none"> 1. AXXXX Bin AXXXX; Land Area: 1.200 Ha; MPOB License: 888719001014; License Expiry Date: 31/10/2027. 2. RXXXX Bin JXXX; Land Area: 2.43 Ha; MPOB License: 798940001014; License Expiry Date: 30/11/2024. 3. SXXXXXX TXXXX Sdn Bhd; Land Area: 444.90 Ha; MPOB License: 581848002000; License Expiry Date: 28/02/2025. 	Complied
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>It was confirmed that the mill does not receive any indirectly sourced FFB. All FFB are sent directly from estates or smallholders. Therefore, this indicator is not applicable during this assessment.</p>	Not Applicable
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>All estates have established yearly financial budget for their Capital Expenditure (CAPEX) and Operation Expenditure (OPEX) which detailing their allocation for details as below:</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none">• FFB projection from each block• Income and expenditure• Sundry Revenue• Operation Cost• Capital Expenditures• General Charges• Hectarage Statement <p>On the other hand, the business plan for the mill is reflected in the form of an annual budget (MPLAN) and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX.</p> <ul style="list-style-type: none">• Mill intake – FFB input.• Production of CPO• Production of PK• Total Palm Oil Extraction• Total Palm Kernel Extraction• Mill cost													
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>The estate has established the replanting plan as details in table below:</p> <table><tr><td>Estate</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>GSPE</td><td>-</td><td>104.68</td><td>170.82</td><td>178.24</td><td>188.15</td></tr></table>	Estate	2024	2025	2026	2027	2028	GSPE	-	104.68	170.82	178.24	188.15	Complied
Estate	2024	2025	2026	2027	2028										
GSPE	-	104.68	170.82	178.24	188.15										
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Mill and estate have conducted regular Management Review in accordance with the Sustainability Management Procedure Manual: Management Review, Doc. No. SMP-GPB-06, Rev. 04, last updated on 15/04/2024. The meeting discussing matters but not limited to as below:</p>	Complied												

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		<ul style="list-style-type: none">• Status of outstanding issues from previous meeting• Changes, improvement of the Sustainability Management System• Internal and External Audit Findings• Complaints, Grievances and Enquiry Book• Stakeholder Meeting Concern• Preventive and Correctives Action status• Customer Feedback• Compliance status on legal and other requirements• Recommendation for improvement <table><tr><td>Estate</td><td>Date</td></tr><tr><td>Genting Sabapalm Oil Mill</td><td rowspan="2">05/08/2024</td></tr><tr><td>Genting Sabapalm Estate</td></tr></table>	Estate	Date	Genting Sabapalm Oil Mill	05/08/2024	Genting Sabapalm Estate	
Estate	Date							
Genting Sabapalm Oil Mill	05/08/2024							
Genting Sabapalm Estate								
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 -	<p>Social Impact Assessment (SIA) & Human Rights Impact Assessment (HRIM) Report for Genting Sabapalm Oil Mill (GSOM) & Genting Sabapalm Estate (GSPE) dated June 2020 review in March 2021 and prepared by Sustainability Department.</p> <p>The management has established the Social Management Plan and Monitoring Management Plan of Genting Sabapalm Procedures and Responsibilities and the samples as below:</p> <table><tr><td>Social Impact</td><td>Management Plan</td><td>Status</td></tr></table>	Social Impact	Management Plan	Status	Complied		
Social Impact	Management Plan	Status						

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		Social impact assessment	Social impact assessment shall be conducting at least 2 years once	Done on 21, 22 & 24/05/2024	
		List of stakeholders	List of stakeholders shall be updated at least once a year	Evident FY 2024	
		Internal stakeholder consultation and communication meeting	-conduct the meeting with internal stakeholder in quarterly basis -invitation letter shall be sent out at least two weeks before meeting conducted - appropriate action shall be taken for the issued raised in timely manner	-done on 06/06/2024. -ongoing progress -on progress	

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		External Stakeholder Consultation and Communication	-conduct the meeting with external stakeholder in yearly basis - invitation letter shall be sent out at least 2 weeks before meeting conducted -appropriate action shall be taken for the issued raised in timely manner	-meeting done on 14/06/2024 (smallholders) and 11/07/2024 (GSPE) -done via WhatsApp group -all issues raised closed during the meeting
		Complaint and grievances	To ensure all complaints and grievances are recorded and appropriate actions taken in timely manner	ongoing
		Others social impact included in the management plan were worker committee, contract agreement, pay and conditions, facilities-line site, workplace, etc and sexual harassment.		
Documented as per Genting Sabapalm Estate (GSPE) Continuous Improvement Plan; Date: 01/01/2024 as per sample as following:				
		Requirement	Objective	Action plan

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		Minimize use of certain pesticides	Mainly targeted at usage of Highly Toxic Pesticides Class 1a and 1b chemical i.e. Paraquat, Metamidophos and other chemicals such as rat bait etc.	Use of alternative pesticides that are safe and less toxic i.e. Basta and Glyphosate Improvement actions: Change from paraquat to other alternative chemicals i.e. Glphosate for VOPs at mature areas or kenlon for spot spraying, except Stenochlaena Monix used at immature areas instead of Paraquat	
				Monthly pesticides issue record Improvement Actions: Briefing to staffs and executives on minimizing pesticides and continue	

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		<table><tr><td></td><td></td><td>monitoring, avoid wastage</td></tr><tr><td></td><td>Expand IPM Programme</td><td>Planted with 250 ha of <i>Tunera</i></td></tr></table> <p>Sabapalm POM main continuous environmental improvement plan mainly based on the compliance schedule of DOE license # 005261; Validity period: 01/07/2024 – 30/06/2025; POME final discharge method: Land application; Max FFB processing capacity: 20 mt/hr; Max POME discharge capacity: 18m³/hr.</p>			monitoring, avoid wastage		Expand IPM Programme	Planted with 250 ha of <i>Tunera</i>	
		monitoring, avoid wastage							
	Expand IPM Programme	Planted with 250 ha of <i>Tunera</i>							
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 raw data source records for RSPO template verified including mill production reports, estate yield reports, chemical and fertilizer bin cards, JKPP reports, and complaints and grievances records etc. All data submitted were acceptable and consistent with verified records.</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>Genting Sabapalm Oil Mill and the estate are guided by a number of SOPs that have been established for standardization as well as to ensure implementations and operations are in accordance with the legal requirements and best practices.</p>	Complied						

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		<p>Sighted Sustainability Management Procedure Manual (SMPM) were available for verification. Genting Sabapalm Oil Mill. A total of 34 documents in SMPM Contents such as:</p> <ul style="list-style-type: none">• Control of Documents, Doc. No. SMP-GPB-01, Rev.00 dated 01/08/2013.• Traceability, Doc. No. SMP-GPB-09, Rev.06 dated 11/01/2023.• Scheduled Waste Management, Doc. No. SMP-GPB-11, Rev.02, dated 11/10/2013.• Complaint and Grievances, SMP-GP-19, Rev.04 dated 15/04/2024.• Supply Chain and Traceability, Doc. No. SMP-GPB-33, Rev.00 dated 27/07/2020.• Pollution Management (SPM-GPB-31) Rev.01 dated 02/08/2016. <p>While operation activities in estate, there are 17 Safe Work Procedures established as per examples below:</p> <ul style="list-style-type: none">• FFB Harvesting, Doc. No. GEN/SOP/05/001, dated 11/10/2022.• FFB Transportation, Doc. No. GEN/SOP/00/006, dated 11/10/2022.• Genset Operation, Doc. No. GEN/SOP/00/014, dated 12/07/2022.• Nursery Operation, Doc. No. GEN/SOP/00/013, dated 01/05/2019.• Grabber Operation, Doc. No. GEN/SOP/00/017, dated 01/06/2021.• Replanting Activities, Doc. No. GEN/SOP/00/008, dated 12/07/2022.	
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3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	<p>There are various mechanism and methods for Genting Plantations Berhad to monitor estate and mill implementation accordingly. Among the program but not limited to are:</p> <ul style="list-style-type: none"> • RSPO & MSPO internal audit has been conducted by Sustainable Department on 16-17/07/2024 for Genting Sabapalm Oil Mill and 11-14/06/2024 for Genting Sabapalm Estate. • Self-Assessment Checklist in terms of Legal Compliance of Environmental and Safety & Health, dated 15-16/05/2024. • Safety & Health Internal Audit by region's OSH Manager, dated 11/07/2024 for mill and 12/07/2024 for estate. 	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<p>The ongoing monitoring of SOP implementation was carried out across all levels of supervisory personnel, with records being maintained and verified. There have been no changes in the records since the previous assessment. Among others the records are:</p> <ul style="list-style-type: none"> • Daily production/work records for the core activities • Field Costing Books • Monthly Chemical Consumption Record • Mature/immature field work program • Fertilizer application Records • Herbicide Work Program • Rat Baiting Census Records • Harvesting Standard Checklist • Worksite Inspection Form 	Complied

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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	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>There are no new plantings or operations within Genting Sabapalm Oil Mill and supply base.</p> <p>The Social Impact Assessment (SIA) & Human Rights Impact Assessment (HRIM) Report for Genting Sabapalm Oil Mill (GSOM) & Genting Sabapalm Estate (GSPE) dated June 2020 review in March 2021 and prepared by Sustainability Department.</p> <p>The current social impact assessment was identified through social management plan such as annual stakeholder meeting, social dialogue with workers, workers welfare committee meeting, union meeting, gender committee meeting, etc.</p> <p>Additional assessment will be made based on any new operations and activities. The objective of the assessment is for information and data collection related to social and environment and workers` livelihood issues in Genting Sabapalm Estate and POM and to propose management actions and provide recommendation for identified issues and to manage the social impacts that has been occurred.</p> <p>No new planting in Genting Sabapalm Certification unit. For existing operations, the assessments documented as following:</p> <ul style="list-style-type: none"> - Genting Sabapalm Oil Mill (GSOM) Environmental Aspect and Impact Assessment (EAI) - Genting Sabapalm Estate (GSPE) Environmental Aspect and Impact Assessment (EAI) <p>Review on the assessments conducted with internal and external stakeholders in various meetings with sample documented as following:</p>	Complied

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		Revised Mitigation Plan – Control Measures on Activity: Pesticide Spraying/Application; Date: 20/03/2024													
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 -	<div>The management has established the Social Management Plan and Monitoring Management Plan of Genting Sabapalm Procedures and Responsibilities and the samples as below:</div> <table><tr><td>Social Impact</td><td>Management Plan</td><td>Status</td></tr><tr><td>Social impact assessment</td><td>Social impact assessment shall be conducting at least 2 years once</td><td>Done on 21, 22 & 24/05/2024</td></tr><tr><td>List of stakeholders</td><td>List of stakeholders shall be updated at least once a year</td><td>Evident FY 2024</td></tr><tr><td>Internal stakeholder consultation and communication meeting</td><td><div>-conduct the meeting with internal stakeholder in quarterly basis</div><div>-invitation letter shall be sent out at least two weeks before meeting conducted</div><div>- appropriate action shall be taken for the issued raised in timely manner</div></td><td><div>-done on 06/06/2024.</div><div>-ongoing progress</div><div>-on progress</div></td></tr></table>	Social Impact	Management Plan	Status	Social impact assessment	Social impact assessment shall be conducting at least 2 years once	Done on 21, 22 & 24/05/2024	List of stakeholders	List of stakeholders shall be updated at least once a year	Evident FY 2024	Internal stakeholder consultation and communication meeting	<div>-conduct the meeting with internal stakeholder in quarterly basis</div> <div>-invitation letter shall be sent out at least two weeks before meeting conducted</div> <div>- appropriate action shall be taken for the issued raised in timely manner</div>	<div>-done on 06/06/2024.</div> <div>-ongoing progress</div> <div>-on progress</div>	Complied
Social Impact	Management Plan	Status													
Social impact assessment	Social impact assessment shall be conducting at least 2 years once	Done on 21, 22 & 24/05/2024													
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		External Stakeholder Consultation and Communication	-conduct the meeting with external stakeholder in yearly basis - invitation letter shall be sent out at least 2 weeks before meeting conducted -appropriate action shall be taken for the issued raised in timely manner	-meeting done on 14/06/2024 (smallholders) and 11/07/2024 (GSPE) -done via WhatsApp group -all issues raised closed during the meeting	
		Complaint and grievances	To ensure all complaints and grievances are recorded and appropriate actions taken in timely manner	ongoing	
		Evident the records of appropriate action taken in response to input from internal and external stakeholders meeting conducted on 06/06/2024 and 11/07/2024 as elaborated in 1.1.4 such as type of contribution to community, permission for using estate roads, road maintenance, security patrolling, maintenance of wooden worker quarters, jetty lighting, jetty extension (dry season), etc. The latest review of environmental impact assessment for both Genting Sabapalm Oil Mill (GSOM) & Genting Sabapalm Estate			

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		(GSPE) was conducted during external stakeholder consultation meeting conducted on 20/03/2024	
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>The management has established the Social Management Plan and Monitoring Management Plan of Genting Sabapalm Procedures and Responsibilities, and the samples as elaborated in 3.4.2.</p> <p>Based on the compliance schedule of DOE license # 005261; Validity period: 01/07/2024 – 30/06/2025; DOE file ref. # JAS.SHQ.600-3/1/014; POME final discharge method: Land application; BOD limit: 500 mg/L; Max FFB processing capacity: 20 mt/hr; Max POME discharge capacity: 18m³/hr</p> <p>Monitoring records included the following:</p> <ul style="list-style-type: none"> - Environmental Compliance Audit Report (Third Party Audit by RehPro Jupri Bin Mohd. Bani; EA0157; CISEC MY-1011) for Genting Oil Mills (Sabah) Sdn. Bhd.; Audit tracking # JAS.SSK.600-3/1/3/01/2024; Report Ref. # RNK/JB/ECA/2024-010; Result: 0 NC + 5 Observations. Previous Environmental Compliance Audit (Third Party Audit by The Best Solution Mohd. Hairimi Bin Mohd. Ali; EA0101; CESSWI 3756) Report Ref. # AUDIT/JP/GSOM/12/05/2023; Audit date: 12/05/2023; Report date: 16/05/2023; DOE Audit tracking # ASSH(B)31/152/000/014/AUDIT2023/1 (005261); Result: 2 AFI + 4 Observations - Stack Emission Monitoring Report for Boiler # 2 Year 2024; Report Ref. # RSSB/STACK/2024-018; Sampling date: 27/02/2024 by RehPro Scientific Sdn. Bhd. - Certificate of Analysis # E240730-07-0; Lab Ref. # E240730/07A-07C; Sampling date: 30/07/2024; Report date: 08/08/2024 for sample marking (descriptions) as following: - A: Upstream Labuk River – BOD <2 	Complied

		<ul style="list-style-type: none"> - B: Downstream Labuk River – BOD <2 - C: POME Final Discharge Facultative Pond # 2 – BOD: 82.4 - Fifth Schedule Inventory of Scheduled Wastes File Ref. # JAS.SSK.600-3/1/3; Inventory month: July 2024 - Sixth Schedule Consignment Note for Scheduled Waste; Date received: 14/05/2024; Disposal contractor: Lagenda Bumimas Sdn. Bhd. - Consignment # 2024051411WISGRB; Waste code: SW323 – Spent chemicals; Quantity: 0.12 mt - Consignment # 2024051411EDAZBU; Waste code: SW409 – Contaminated containers; Quantity: 0.027 mt - Consignment # 2024051413LRNP4; Waste code: SW410 – Used Filter; Quantity: 0.091 mt - Consignment # 2024051413LRNP4; Waste code: SW410 – Contaminated rags etc.; Quantity: 0.091 mt 	
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>The management has established the Foreign Workers Ethical & Responsible Recruitment Procedures (Doc No: GEN-13, Rev 06, Issue date 17/10/2023) that covered Zero Recruitment Cost Policy, Recruitment Fees and other costs, Human Resources and Administrative Department, Recruitment Agencies, Recruitment Procedure, Abscondment of Foreign Workers, Renewal/Extension of Work Permit and passports, repatriation-completion of contract/termination/retirement and others.</p> <p>For local employees the HR will request operating unit to provides the following document as part of the hiring process:</p> <ol style="list-style-type: none"> 1. Information of New Local Worker 2. Information of New Dependant 	Complied

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		<div>3. Vaccination Card</div> <div>4. Medical Check-up for New Worker</div> <div>5. Covid 19 test</div> <div>6. Application for Employment</div> <div>7. Identity Card</div> <div>8. Education Certificate</div>																
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	<div>Verifications has been made for local and foreign workers in term of implementation of procedure. There is evidence that procedure has been properly implemented. Evident personal files that comprise the employment contract, identification card, passport, visa, driving license, pay slips, SOCSO and EPF contributions, application for employment, education certificates, etc for the following workers:</div> <div>Genting Sabapalm Oil Mill</div> <table><tr><td>Workers</td><td>Gender</td><td>Nationality</td></tr><tr><td>EE003XX - Workshop</td><td>M</td><td>Philippine – Under Smart Sabah dated 21/05/2024 – barcode: 80000078</td></tr><tr><td>EE003XX - WB Operator</td><td>F</td><td>Malaysia</td></tr><tr><td>E003XX - Store</td><td>F</td><td>Malaysia</td></tr><tr><td>E002XX - Effluent and Land Application</td><td>M</td><td>Indonesia Passport valid to 06/11/2033 and visa valid to 18/01/2025</td></tr></table>	Workers	Gender	Nationality	EE003XX - Workshop	M	Philippine – Under Smart Sabah dated 21/05/2024 – barcode: 80000078	EE003XX - WB Operator	F	Malaysia	E003XX - Store	F	Malaysia	E002XX - Effluent and Land Application	M	Indonesia Passport valid to 06/11/2033 and visa valid to 18/01/2025	Complied
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			E002XX - Shift A	M	Malaysia
			E003XX - Shift B	M	Indonesia Passport valid to 08/01/2028 and visa valid to 12/04/2025
			E002XX - Shift C	F	Indonesia Passport valid to 17/07/2027 and visa valid to 21/02/2025
			E003XX - Driver Tanker	M	Malaysian
			<u>Genting Sabapalm Estate</u>		
			Workers	Gender	Nationality
			E10XXX-Field Worker	M	Indonesia Passport valid to 13/02/2033 and visa valid to 23/02/2025
			E11XXX GW – Boatman Agreement signed on 6.12.2021	M	Malaysia
			E11XXX Field worker – agreement date 02/01/2024	F	Malaysia

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		E002XX Field Worker – manuring – agreement date 22/02/2023	M	Indonesia Passport: 27/02/2033 and visa 21/02/2025	
		E11XXX Field worker- Contract Agreement dated 01/02/2022	M	Indonesia Passport valid to 19/08/2027 and visa valid to 08/12/2024	
		E11XXX Field worker Contract agreement dated 01/01/2023	F	Indonesia Passport valid to 19/08/2027 and visa valid to 08/12/2024	
		E11XXX Harvester Contract Agreement dated 01/03/2024	M	Indonesia Passport valid to 10/11/2033 and visa 29/06/2025	
		E10XXX Harvester Contract Agreement 17/02/2020	M	Indonesia Passport 14/02/2025 and visa valid till 06/02/2025	
		E10XXX Harvester Contract Agreement dated 01/03/2024	M	Indonesia Passport valid to 19/11/2026 and visa valid to 08/02/2025	
		E10XXX	M	Indonesia	

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		Driver Mini Grabber Contract Agreement 20/02/2023		Passport valid to 19/02/2033 and visa valid to 21/02/2025	
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>Risk assessment in operations has been assessed and action plan has been implemented accordingly as details below:</p> <p><u>Genting Sabapalm Oil Mill</u></p> <ul style="list-style-type: none"> • HIRARC, Doc. No. SP-MGR-01-F01-1 was last reviewed and updated on 01/03/2024 for all stations covering operation area, store, and facilities area. All types of hazards were identified, and risk control are measured. • Chemical & Health Risk Assessment (CHRA) has been conducted on 23/11/2020, Ref. No. HQ/11/ASS/00/290-2020/038. The assessment covered 6 work units which includes mill laboratory, Boiler, Workshop & Engine Room, Kernel Plant, Water Treatment Plant and store. CHRA Action plan has been developed and implementation was monitored by mill to improved and control the risk of chemical exposure. • Baseline Noise Risk Assessment was conducted on 15-16/04/2021 by assessor with DOSH reg. no. HQ/14/PEB/00/125 for 20 stations: Lab, Loading Ramp, Capstan, Sterilizers, Crane & Threshers, Press, Oil Room, Kernel Plant, Engine Room, Boiler, Shovel Operation, Compound Maintenance, Workshop, Tractor Operation, Water Treatment Plant, Effluent Treatment, Store & Grading. • Mill completed its Audiometric Test on 19/03/204 & 			Complied

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		<p>25/03/2024, report no. AUD 0324/487 by assessor with DOSH registration no. JKPP IH 127/171-1(309). 32 workers were involved resulting 5 workers required to be sent for medical examination. All 5 workers sent to for medical checkup on 25/04/2024 and all workers were found to be medically fit with normal hearing.</p> <ul style="list-style-type: none">• Medical Surveillance has been conducted for individuals exposed to chemical. The medical surveillance has been conducted on 02/07/2024 by certified assessor for 24 persons in total. Sighted result of examination for medical surveillance dated on 06/08/2024 and all workers examined are fit to work. <p><u>Genting Sabapalm Estate</u></p> <ul style="list-style-type: none">• HIRARC, Doc. No. GENP/HIRARC/05/001-005 were last reviewed and updated on 24/07/2024 for FFB Transportation Activity While for other stations covering from operation area, store, and facilities area remain updated on 30/03/2024. Based on documents review and site observation, all types of hazards were identified, and risk control are measured.• Chemical & Health Risk Assessment (CHRA) has been conducted in October 2019, Ref. No. HQ/07/ASS/00/236-2019/158 by DOSH approved assessor. The assessment covered 9 work units which includes premix area, field spraying, field manuring, field rat biting, field trunk injection, workshop and store operator & scheduled wasted store. It was noted that updated CHRA assessment has been conducted on 27/04/2024 . However, these	
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		<p>CHRA report is yet to be provided due to some technical correction by the assessor.</p> <ul style="list-style-type: none"> Estate completed its Baseline Noise Risk Assessment, Doc. No. CC/0421/053 on 01/04/2021, conducted by an assessor with DOSH registration no. HQ/18/PEB/00/00024 – grass cutter operator, compactor driver, grabber driver, super bull driver, tractor driver, and workshop, operator. Result of the assessment found that all three activities were below noise exposure limit and no further action required. Audiometric Test was conducted on 05/02/2024, by Audiometric Test Center with DOSH registration no. JKKP/2023/11-04/00036. 67 workers were involved resulting 2 workers has Abnormal Audiogram and 1 worker have Standard Threshold Shift (STS). Sighted submission of JKKP 7 notification for abnormal diagram with reference number SB/SKES/24/00127 Medical Surveillance has been conducted for individuals exposed to chemical. The medical surveillance has been conducted on 05/06/2024 by certified assessor for 52 workers in total. Sighted result of examination for medical surveillance concluded that all workers examined are fit to work. 	
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>The effectiveness of Health and Safety in the certification unit is monitored and ensured by the management teams of the operating units through the recording of various checklists and trainings. Site visits to sampled operations and workstations at the mill and estates indicated that, in general, the control measures outlined in the HIRARC, and SOPs were implemented satisfactorily. It was observed that there are unsafe observation and gaps in implementation of risk control at location as below:</p>	Non-compliance

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		<p><u>Genting Sabapalm Oil Mill</u></p> <ul style="list-style-type: none"> - At Loading Ramp, it was observed that workers stored their loading spikes by tucking them between the roof of their shelter, while other working tools were scattered around the area. - At the Scrap Iron Area, it was observed that the scrap metal collection area has become excessively high, and no control measure of risk has been implemented. <p><u>Genting Sabapalm Estate</u></p> <ul style="list-style-type: none"> - During the site visit to Field Block 22, it was observed that one worker was responsible for packaging decanter cake into empty bags for use as additional fertilizer. There are no risk control measure has been taken according to HIRARC documents <p>Hence, Major Non-Conformity is raised.</p>	
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>Genting Sabapalm Oil Mil and Estate have established and documented a training plan based on an annual training needs analysis. The Training Need Analysis, Doc. No. PM-MGR-05-F01-0and Training Schedule for FY 2024 were reviewed, covering all job designations, including contractors. The training program encompasses areas such as Safety, Environment, and Management Systems.</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Training records were maintained and kept as sampled:</p> <p><u>Genting Sabapalm Oil Mill</u></p> <ul style="list-style-type: none"> • PPE Training for Chemical Handlers dated 08/02/2024. 	Complied

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		<ul style="list-style-type: none"> • Confined Space and Working at Height Briefing, dated 09/02/2024. • Training on Company Policies dated 19/03/2024. • Safety Use of Chemical Management dated 26/03/2024. • Risk Management and HIRARC Updates Briefing, dated 27/03/2024. • Safe Operating Procedure & Environmental Control Procedure dated 27/03/2024. • Accident Investigation & NADOPOD, dated 28/04/2024. • First Aid Training dated 29/05/2024. • Scheduled Waste for Handler dated 14/06/2024. • Emergency Preparedness/Fire Drill Mil & Housing /Fire Extinguisher dated 24/07/2024. • Zero Burning Training dated 08/08/2024. • Domestic and Recycling Waste Management Program, dated 08/08/2024. <p><u>Genting Sabapalm Estate</u></p> <ul style="list-style-type: none"> • Training on Safe Work Procedure for Tractor Handling, HIRARC & PPE Use, dated 16/05/2024 • Training on Manual Spraying and Mechanical Spraying Work Procedure, dated 16/05/2024 • Training on Manuring Procedure and HIRARC, dated 08/02/2024 • Training on Safe Work Procedure for Harvesting, dated 22/03/2024 • Fire & Emergency Response Procedure, dated 26/03/2024 	
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		<ul style="list-style-type: none"> First Aid Box Training, dated 23/05/2024 HCV Awareness Training, dated 26/04/2024 Genset Operation Briefing, dated 11/05/2024 	
3.7.3	<p>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.</p> <p>- Minor Compliance -</p>	<p>Training conducted from time to time to all personnel critical in SCCS effective implementation. Latest training was conducted to Weighbridge personnel, as per Training record dated 20/03/2024.</p>	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	<p>Identity Preserved Module</p> <p>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.</p> <p>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.</p>	<p>N/A since Genting Sabapalm Oil Mill (GSOM) implements MB module.</p>	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>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.</p>	<p>The Palm Oil Mill receives and processes both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.</p>	Complied

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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 certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	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
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Company has registered their mill in the PalmTrace: <ul style="list-style-type: none"> – License ID: CB153433 – Members Name: Genting Oil Mills (Sabah) Sdn. Bhd - Genting Sabapalm Oil Mill – Members ID: RSPO_PO1000004650 – RSPO Membership Number: 1-0086-06-000-00 (Genting Plantations Berhad) – Type Of Business: Oil Mill 	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 	<p>Documented procedures established as per Sustainability Management Procedure Manual (SMPM) – Supply Chain and Traceability (Palm Oil Mill); Doc. # SMP-GPB-23; Rev. 15; Issue date: 15/04/2024 to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. Other procedures relevant were developed by mill as following:</p> <ul style="list-style-type: none"> - Incoming Inspection (Direct Material), Doc. No. PM-PRD-04 dated 02/01/2018 - Product Identification & Traceability, Doc. No. PM-PRD-01 dated 02/01/2018 - Handling, Storage, Preservation and Delivery, Doc. No. PM-LAB-03 dated 02/01/2018 	Complied

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	<p>to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>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>	<p>- Genting Plantations Berhad; RSPO SCCS Requirement, Documentation Guidelines and Compliance Status; Prepared By: Sustainability Department; Last Amended: 20/04/2018.</p> <p>Identified PIC as per letter of Appointed Management Representative for ISCC, RSPO and MSPO Related Matters; Date: 26/06/2024 of Mill Manager by Assistant Vice President - Processing (Malaysia).</p>	
3.8.6	<p>Internal Audit</p> <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>The internal audits conducted by sustainability personnel based on Sustainability Management Procedure Manual – Sustainability Internal Audit; Doc. # SMP-GPB-03; Rev. 08; Issue date: 15/04/2024. Latest SCCS internal audit was conducted in Genting Sabapalm POM as per Internal Audit Report; Internal audit date: 16-17/07/2024; Report date: 19/07/2024. No findings on SCCS requirements.</p> <p>Management review meeting was latest conducted as per Minutes of Internal Audit Management Review Meeting; Date: 05/08/2024.</p>	Complied
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 accompanying documents of incoming FFB from own estate are estate's weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate's ticket number is recorded in the mill's ticket number as per sample FFB received tickets as following:</p> <p>- Supplier: Genting Sabapalm Estate; FFB Despatch Advice # A168709; FFB Weighbridge Ticket # FFB24008982W; Product:</p>	Complied

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		<p>RSPO Certified FFB; Field block # SSP1PP17AE; Net weight: 6,260 kg; Date: 05/08/2024</p> <p>Mechanism in place for handling non-conforming FFB and/or documents available as per Procedure Manual Title: Control of Nonconforming/Noncertified Product; Doc. # PM-PRD-05; Rev. 01; Issue date: 12/12/2019.</p>	
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>No certified CPO sales except for PK only. All information required by the standard was available in various shipping documents such as transporter's delivery order, mill's weighbridge, buyer's receiving notes as per sample PK despatch as following:</p> <ol style="list-style-type: none"> The name and address of the buyer: IOI Edible Oils Sdn. Bhd.; Address: P.O. Box 3423, 90738 Sandakan, Sabah The name and address of the seller: Genting Sabapalm Oil Mill; Address: Wisma Genting Plantations, KM12, Jalan Labuk, 90000 Sandakan, Sabah The loading or shipment / delivery date: 27/07/2024 The date on which the documents were issued: 27/07/2024 RSPO certificate number: RSPO 653477 A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): PK RSPO MB The quantity of the products delivered: 31,530 kg Any related transport documentation: Weighbridge Ticket # PKMB24000039W A unique identification number: DO # 112281 	Complied
3.8.9	<p>Outsourcing Activities</p> <ol style="list-style-type: none"> The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors 	<p>There is no milling activity outsourced by the mill. Transportation of CPO and PK is outsourced to two contractors. Verification of the contract agreements showed that the requirements of RSPO SCCS</p>	Complied

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	<p>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</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <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>were also included in the contract involving CPO and PK Transport Agreement as following:</p> <ul style="list-style-type: none"> - The mill maintains legal ownership of CPO and PK during the transportation by the contractor to the buyer - Sighted the contract agreement with Landasan Kembar Sdn Bhd (Dated: 01/09/2023 – 31/08/2025) available for verification. The contract agreement states under Addendum on RSPO, MSPO, ISCCS and OSHA 1994 that the certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. - The Supply Chain and Traceability (Palm Oil Mill) Procedure has been communicated to the contractors during the signing of the contract agreement. <p>The Transporter Contract Agreement states under Addendum on RSPO, MSPO, ISCCS and OSHA 1994 that they commit to provide relevant access for duly accredited CBs to their respective operations, systems, 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 name and contact details of the transporters were recorded in the mill's list of stakeholders and updated whenever necessary. Latest updates for stakeholder list were on 03/01/2024	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.	The list of contractors is updated from time to time by the mill. Based on document review and interview session with mill management, it was confirmed that no new contractors appointed for physically handled of RSPO certified oil palm products.	Complied
3.8.12	Record keeping	The mill opted for three monthly basis record and balance. Excel format is used for the mass balance calculation. Among the information available in the format is month, FFB processed, OER,	Complied

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	<ul style="list-style-type: none"> 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. 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. 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. iv) For Mass Balance Module, the mill: <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). 	<p>CPO amount (opening, produced, and closing), dispatch of CPO & PK and balance of CPO & PK both in virtual and physical. Verification of the MB sheet showed that the mill was able to demonstrate the products were delivered from positive stocks. Should there be any short sale, it will be balanced within three months. Relevant records and reports retained for 2 years as per sample as following:</p> <p>Daily Production Figure (Report) for 30/08/2022; FFB production</p>	
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>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER can be seen in Table 10 of this report.</p>	Complied

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3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER can be seen in Table 10 of this report.	Complied
3.8.15	Processing 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.	N/A. The facility opted for mass balance model.	Not Applicable
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to 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.	<p>The Marketing Palm Product Department at HQ is responsible for PalmTrace registration and monitor all transactions recorded.</p> <p>Based on the announcement summary, all the registrations were found to be in order and announced within the 3 months after despatch. Sampled despatch of PK as below.</p> <p>CSPK - MB; Contract Number: SGOMS/PK/2406/S01; Despatch Date: 15/06/2024; PalmTrace Announcement Date: 20/06/2024.</p> <p>CSPK - MB; Contract Number: SGOMS/PK/2305/S02; Despatch Date: 28/05/2024; PalmTrace Announcement Date: 20/06/2024.</p> <p>It was affirmed that there is no sales of Certified CPO May 2023.</p> <p>Registration of Transactions carried out as per Sustainability Management Procedure Manual (SMPM) – Supply Chain and Traceability (Palm Oil Mill); Doc. # SMP-GPB-23; Rev. 15; Issue date: 15/04/2024.</p> <p>i) The procedure specified that the Marketing Palm Products Department (MPPD) to perform Shipping Announcement in</p>	Complied

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		<p>Palm Trace within 3 months from the date of the first physical dispatch of the contract as per sample for Transaction ID # TR-afe06b58-3aa8; Created date: 12/07/2024; Confirmation date: 15/07/2024</p> <p>ii) The procedure also specified that the MPPD to remove the RSPO volumes sold under ISCC, MSPO or conventional at least once a year</p> <p>Removals done before the expiry of the license period for previous license.</p>	
3.8.17	<p>Claims</p> <p>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.</p>	<p>Genting Plantations Berhad aware with the requirements of the RSPO Rules on Market Communications and Claims and have obtained the RSPO Trademark License since 31/03/2011. Nonetheless, it was confirmed that RSPO trademark was not used</p> <p>No product claims made except for corporate communications with details in General Corporate Communications indicators below.</p>	Complied
General corporate communications			
4.1	<p>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.</p>	<p>A corporate communication was made in Genting Plantations Berhad Integrated Annual Report 2023 (GENP-IAR-2023) as per web link as following: https://www.gentingplantations.com/wp-content/uploads/2024/04/GENP-IAR-2023.pdf.</p>	Complied
4.2	<p>In corporate communications, a member is allowed to:</p> <ul style="list-style-type: none"> 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 	<p>RSPO Trademark was used in Genting Plantations Berhad Integrated Annual Report 2023 (GENP-IAR-2023) report under title Sustainability Highlights for statement 100% RSPO certified in Malaysia. However, the further trail of the report was found that the report has been approved and endorsed by Genting Plantation</p>	Complied

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	E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership	Berhad's Board of Directors on 08/03/2024. Details Genting Plantation Berhad's Trademark Licence as below: - RSPO License Number: 1-0086-06-100-00 - Trademark Licensee Name: Genting Plantations Berhad - License Start Date: 07/06/2023 - License Expiration Date: 06/06/2025	
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.	Verified records and reports confirmed that no RSPO corporate logo has been used in Genting Sabapalm Oil Mill (GSOM) certified product shipping documentations and corporate communications.	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 statement made by Genting Sabapalm Oil Mill (GSOM) that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	Complied
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." 	A general statement of RSPO certification status highlights made in Genting Plantations Berhad Integrated Annual Report 2023 (GENP-IAR-2023) with no statement on product-related claims.	Complied

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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> <p>i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)."</p> <p>ii. 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> <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>	Not applicable as Genting Sabapalm Oil Mill (GSOM) is a certified member.	Not Applicable
Product-specific communications			
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.	Product specific communications made off pack on shipping documents as per sample for CSPO despatch Weighbridge Ticket # PKMB24000039W as per indicator 3.8.8 above.	Complied
5.1.2	Product-specific communications are voluntary.	No Product-specific communications are being made by Genting Sabapalm Oil Mill (GSOM). Hence, this requirement is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK.	Not Applicable

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		Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	
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 Product-specific communications are being made by Genting Sabapalm Oil Mill (GSOM). Hence, this requirement is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
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 Product-specific communications are being made by Genting Sabapalm Oil Mill (GSOM). Hence, this requirement is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
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. • 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. 	No Product-specific communications are being made by Genting Sabapalm Oil Mill (GSOM). Hence, this requirement is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
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	No Product-specific communications are being made by Genting Sabapalm Oil Mill (GSOM). Hence, this requirement is not applicable as no packings required for the mill products as	Not Applicable

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	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	deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	
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 hence, this is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
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.	The mill announced the certified sales while the buyers confirmed the receipt as of Table 11 above via Palm Trace.	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: <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. 	This is not applicable since the mill is neither a distributor nor wholesaler.	Not Applicable

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	<ul style="list-style-type: none"> 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.	No on-pack claims made hence, this is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	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>	No on-pack claims made hence, this is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	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* Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	No on-pack claims made hence, this is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> RSPO 50% MIXED* Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	No on-pack claims made hence, this is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable

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	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.	No on-pack claims made hence, this is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	No on-pack claims made hence, this is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No on-pack claims made hence, this is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	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.	No on-pack claims made hence, this is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	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.	No on-pack claims made hence, this is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	Based on the excel sheet mass balance accounting of the mill, production of certified products was calculated correctly according to fractions of FFB received from both certified and non-certified	Complied

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		suppliers. Therefore, 100% of certified oil palm content in the products can be achieved.	
	If 100% of RSPO MB 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 palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	Based on the excel sheet mass balance accounting of the mill, production of certified products was calculated correctly according to fractions of FFB received from both certified and non-certified suppliers. Therefore, 100% of certified oil palm content in the products can be achieved.	Complied
Messaging			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> • [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. • The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. 	Genting Sabapalm Oil Mill (GSOM) only apply MB model and the conventional CPO are downgraded from MB whenever demanded.	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"> • The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 	No on-pack claims made hence, this is not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and PK MB.	Not Applicable
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.			

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4.1.1	<p>(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 and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>The management has established Social Policy dated 14/09/2020 signed by Tan Wee Kok, President & Chief Operating Officer. As a responsible of the organization, the company committed to ensure that our workers and employees are treated fairly, equally and with respect according to local, national, and rectified international laws.</p> <p>Mentioned the policy, the company prohibited retaliation against human rights defenders who submit complaints in good faith in line with company Whistleblower Policy which provides a grievances channel for human rights defenders to report their concerns freely and without fear of reprisal or intimidation. However, we will tolerate reports made wrongly with/without malicious intent.</p> <p>The policy has been communicated to internal and external stakeholders as follows.</p> <p><u>Genting Sabapalm Oil Mill</u></p> <p>Stakeholders meeting with Smallholders (External) for Genting Sabapalm Oil Mill has been conducted on 14/06/2024 attended by Mill Manager, Marketing Manager, Sustainability Department, Sr Assistant Genting Sabapalm Estate (GSPE), Document Controller GSOM, Mill Engineer GSOM, and smallholders (Zurinah Abah, Rossledy A/K Jus Bowen, Norlena Tangkawang (David Jais Rep), En Maika Ibau, Luaren Jais, Mursalim Hattamu (Dragon Villa Rep), and Ismail Marupu (Tang Hong Piau rep).</p> <p>The previous External Stakeholders consultation FY 2023 at Kelab Labuk Genting Sabapalm Estate (GSPE) on 11/04/2023 attended by Genting Sabapalm Estate (GSPE) Manager and Assistant Manager</p>	Complied
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		<p>GSPO Manager, Ketua Kg Tagas-tagas, Ketua Kg. Klagan, JPPK Kg. Bambangan, SK Tagas-tagas, SMK Pamol, Palm Mach Sdn Bhd, ICP Agro Solution, Assistant Manager Pamol Estate, Klinik Kesihatan Tagas-tagas, etc.</p> <p>The training to all workers as per checkroll on QESH & Sustainability Policy on 19/03/2024 at GSOM Muster Area that covered Quality Policy, Environment Policy, Occupational Safety and Health Policy, Sustainability Policy, Human Policy, Sexual Harassment Policy, Zero Burning Policy, Ethical Conduct and Integrity Policy, Social Policy and Food Safety Policy.</p> <p><u>Genting Sabapalm Estate</u></p> <p>External Stakeholder Consultation Meeting FY2024 has been conducted on 11/07/2024 at Kelab Labuk, Genting Sabapalm Estate (GSPE) attended by 21 person such as Manager, Assistant Manager and staff of Genting Sabapalm Estate (GSPE), Auxiliary Police of Genting Sabapalm Estate (GSPE), Warden Jemaat St Paul (church), Medical Assistant Klinik Kesihatan Tagas- Tagas, JKKK Kampung Tagas-Tagas, SK Ladang Sabapalm, HUMANA teacher, OCS Police Station Tagas-Tagas, Ancom Crop Care, SMK Pamol, SK Tagas-Tagas dan SK Ladang Sabapalm. Part of the agenda covered safety briefing, introduction, approval of 2023 minutes meeting, briefing on MSPO, RSPO, ISCC, and OSH, any matters arising. All matter arising has been discussed and appropriate actions have been taken.</p> <p>Training on company policies has been conducted on 07/02/2024 and 16/02/2024 covered Quality Policy, Environment Policy, Occupational Safety and Health Policy, Sustainability Policy, Human</p>	
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		<p>Policy, Sexual Harassment Policy, Zero Burning Policy, Ethical Conduct and Integrity Policy, Social Policy and Food Safety Policy.</p> <p><u>Genting Sabapalm Oil Mill and Genting Sabapalm Estate</u></p> <p>Internal Stakeholders Consultation has been conducted on 06/06/2024 at Kelab Labuk, Genting Sabapalm Estate attended by Estate Manager and Assistant Manager, Mill Manager, Chief Clerk (Gender Committee), Sustainability Genting Sabapalm Estate (GSPE), Auxiliary Police, Welfare Committee Chairman, Liong Enterprise, Warung Shema, Kedai Nurani, Dinamik Enterprise, Syarikat CM, Hon Kim Enterprise, Syarikat Tan Hong Transport, Syarikat Abadi Maju, Nur Aisyah Trading and AAA Unit.</p> <p>As per interview session with sample workers and external stakeholder including local communities representatives at both mill and estate, it was indicated that all of them able to demonstrated their understanding on the Genting's Human Right Policy and the importance of promoting good practice for human rights protection.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Genting Plantations Berhad, in accordance with its policy, strictly prohibits any acts of inciting violence or any form of harassment within its operations which detailed on up in indicator 4.1.1. Interviewed with the workers and stakeholders confirmed that they are aware prohibition for any harassment by the management and action will be taken for any cases of harassment happen. As for the day of audit, there is no harassment cases happen in both Genting Sabapalm POM and estate that been confirmed through interview with both workers and stakeholders.</p>	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			

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4.2.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Mechanism for lodge any complaint has been raised in the document number SMP-GPB-19 revision 05 issuance date June 2022 title "Sustainability Management Procedure Manual", 3.0, Complaints and Grievances Handling Procedure.</p> <p>Stated in the procedure that the timeframe for the action taken depend on the seriousness of the complaint or grievance.</p> <p>It also mentioned in the clause 2.1.9 that accepted time frame to acknowledge and respond to the complaint (s) is within 1 months period. For complaint channel, stated in that written complaint can be delivered to management through email, post of short messaging systems. Other than that complaint can be extended via careline to VP-HRAD at head office.</p> <p>Other than that, for female workers, there is specific procedure has been established in the document title Procedure on Prevention and Eradication of Sexual Harassment at the Workplace document number SMP-GPB-20 dated January 2023. Stated in the procedure, any complaint related to female can be lodge through gender committee, immediate supervisor, head of department or Human resources and administration department (HRAD) Stated in the procedure will be given option of access to independent legal and technical advice, to choose individuals or groups to support them and act as observer as well as the option of third-party mediator.</p>	Complied
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>The management has established Complaints and Grievances Procedure (Doc No: SMP-GPB-19, Revision 05, Issue Date: June 2022) approved by Koh Chung Shen, Head of Sustainability.</p> <p>The procedure has been communicated during internal and external stakeholders meeting and internal training as mentioned in the indicator 1.1.4.</p> <p>As per interview with workers and the sample stakeholders, it has been confirmed that the procedure has been communicated to them</p>	Complied

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		and all of them can demonstrate their understanding on the procedure. There are no illiterate parties has been identified.	
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 -	Evident the records of appropriate action taken in response to input from internal and external stakeholders meeting conducted on 06/06/2024 and 11/07/2024 as elaborated in 1.1.4 such as type of contribution to community, permission for using estate roads, road maintenance, security patrolling, maintenance of wooden worker quarters, jetty lighting, jetty extension (dry season), etc. The management directly give the feedback to the stakeholders during the meeting. Any updates will be informed from time to time.	Complied
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 -	The process for submitting complaints is outlined in document number SMP-GPB-19, version 05, which was issued in June 2022 and titled "Sustainability Management Procedure Manual." Section 3.0 of this manual pertains to the procedure for managing complaints and grievances. As described in the procedure under clause 2.1.10, individuals lodging complaints will have the opportunity to access independent legal and technical advice. They can also select individuals or groups to provide support and serve as observers. Additionally, there is an option to engage a third-party mediator if desired.	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 -	The Corporate Social Responsibility (CSR) initiatives presented are founded upon interactions with stakeholders during stakeholder's meetings, or in response to requests from stakeholders via established communication and consultation procedures. Evident the records of appropriate action taken in response to input from internal and external stakeholders meeting conducted on 06/06/2024 and 11/07/2024 as elaborated in 1.1.4 such as type of contribution to community such as housing repairs for	Complied

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		<p>schoolteacher, permission for using estate roads, road maintenance for smallholders and teacher, security patrolling, maintenance of wooden worker quarters, jetty lighting, jetty extension (dry season), etc.</p> <p>During interview with the external stakeholders, they informed the company provides treated water to Klinik Kesihatan Tagas- Tagas, Balai Polis Tagas-Tagas, and SK Ladang Sabapalm school building was maintained by the management including teachers houses as evident during site visit.</p> <p>The above contribution also was documented in the Genting Sabapalm Oil Mill – Corporate Social Responsibility (CSR) such as:</p> <ol style="list-style-type: none"> 1. Supplied water to Klinik Kesihatan Tagas-Tagas 2. Instructed Electrical team to maintain ceiling fan SRK Ladang Sabapalm 3. Supplied water to Masih Jaya Sdn Bhd 4. Supplied water to Kg Lumantik 5. Supplied water to Quarters Sk Tagas-Tagas 6. Supplied water to Masjid Al-Taqwa Tagas-Tagas <p>Evident the Corporate Social Responsibility (CSR) for Genting Sabapalm Estate as below:</p> <ol style="list-style-type: none"> 1. Request security control from SK Ladang Sabapalm during PIBG volleyball event on 05 to 07/07/2024. 2. Permission to use Genting Sabapalm Estate Hall on 11/07/2024 from SK Genting Sabapalm. 3. Permission to use estate area for school event on 07/07/2024. 	
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.			

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4.4.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>There are 3 land titles for Genting Sabapalm complex which 2 has been transferred of leased from Kwang Borneo development company on 22/01/1964 to Sabah Development Company Ltd (Currently known as Genting Plantations Berhad) and the other 1 leased from Sabah state government. Details of the land title as per below:</p> <table><tr><th>Lease</th><th>HA</th><th>Lease Period</th></tr><tr><td>08510997</td><td>2,118.12</td><td>10/07/1888 – 10/07/2887 (999 years)</td></tr><tr><td>08510996</td><td>1,957.46</td><td>10/07/1888 – 10/07/2887 (999 years)</td></tr><tr><td>085319231</td><td>283.00</td><td>10/07/1987 – 31/12/2085 (99 years)</td></tr><tr><td></td><td>4,358.58</td><td></td></tr></table> <p>Evident Quit Rent Payment Statement to Jabatan Tanah Ukur Sabah, Malaysia title no: 085319231.</p> <p>Evident the Tenancy Agreement made on 12/07/2024 between Genting Plantations Berhad and Genting Oil Mills (Sabah) Sdn. Bhd. The land held under CL085109968. The Contract valid to 30/06/2027. The rental rate was stated in the agreement.</p> <p>Evident invoice: GSPEC100003745 dated 18/06/2024 from Genting Sabapalm Oil Mill to Genting Sabapalm Estate for quit rent.</p> <p>No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities.</p>	Lease	HA	Lease Period	08510997	2,118.12	10/07/1888 – 10/07/2887 (999 years)	08510996	1,957.46	10/07/1888 – 10/07/2887 (999 years)	085319231	283.00	10/07/1987 – 31/12/2085 (99 years)		4,358.58		Complied
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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:	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process. The legality of land was evident (as reported under 4.4.1).	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 -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process. The legality of land was evident (as reported under 4.4.1).	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 -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process. The legality of land was evident (as reported under 4.4.1).	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 -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process. The legality of land was evident (as reported under 4.4.1).	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>	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process. The legality of land was evident (as reported under 4.4.1).	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>	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process. The legality of land was evident (as reported under 4.4.1).	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>	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process. The legality of land was evident (as reported under 4.4.1).	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>	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process. The legality of land was evident (as reported under 4.4.1).	Complied
<p>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.</p>			

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4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting at Genting Sabapalm Estate as verified by reviewing the documents and interview with workers and staffs. There are 3 land titles for Genting Sabapalm complex which 2 has been transferred of leased from Kwang Borneo development company on 22/01/1964 to Sabah Development Company Ltd (Currently known as Genting Plantations Berhad) and the other 1 leased from Sabah state government. Details of the land title as per below:</p> <table><tr><td>Lease</td><td>HA</td><td>Lease Period</td></tr><tr><td>08510997</td><td>2,118.12</td><td>10/07/1888 – 10/07/2887 (999 years)</td></tr><tr><td>08510996</td><td>1,957.46</td><td>10/07/1888 – 10/07/2887 (999 years)</td></tr><tr><td>085319231</td><td>283.00</td><td>10/07/1987 – 31/12/2085 (99 years)</td></tr><tr><td></td><td>4,358.58</td><td></td></tr></table> <p>Evident Quit Rent Payment Statement to Jabatan Tanah Ukur Sabah, Malaysia title no: 085319231.</p> <p>Evident the Tenancy Agreement made on 12/07/2024 between Genting Plantations Berhad and Genting Oil Mills (Sabah) Sdn. Bhd. The land held under CL085109968. The Contract valid to 30/06/2027. The rental rate was stated in the agreement.</p> <p>Evident invoice: GSPEC100003745 dated 18/06/2024 from Genting Sabapalm Oil Mill to Genting Sabapalm Estate for quit rent. Thus, this is not applicable.</p>	Lease	HA	Lease Period	08510997	2,118.12	10/07/1888 – 10/07/2887 (999 years)	08510996	1,957.46	10/07/1888 – 10/07/2887 (999 years)	085319231	283.00	10/07/1987 – 31/12/2085 (99 years)		4,358.58		Not Applicable
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4.5.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	There is no new planting for Genting Sabapalm Estate. It has been verified by the auditor and interview with local communities and neighbouring estate. Thus, this is not applicable.	Not Applicable
4.5.3	<p>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.</p> <p>- Minor compliance -</p>	There is no new planting for Genting Sabapalm Estate. It has been verified by the auditor and interview with local communities and neighbouring estate. Thus, this is not applicable.	Not Applicable
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	There is no new planting for Genting Sabapalm Estate. It has been verified by the auditor and interview with local communities and neighbouring estate. Thus, this is not applicable.	Not Applicable
4.5.5	<p>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.</p> <p>- Minor compliance -</p>	There is no new planting for Genting Sabapalm Estate. It has been verified by the auditor and interview with local communities and neighbouring estate. Thus, this is not applicable.	Not Applicable

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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 -	There is no new planting for Genting Sabapalm Estate. It has been verified by the auditor and interview with local communities and neighbouring estate. Thus, this is not applicable.	Not Applicable
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 -	There is no new planting for Genting Sabapalm Estate. It has been verified by the auditor and interview with local communities and neighbouring estate. Thus, this is not applicable.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no new planting for Genting Sabapalm Estate. It has been verified by the auditor and interview with local communities and neighbouring estate. Thus, this is not applicable.	Not Applicable
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.			
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 -	The management of Genting Plantations Berhad adopt the same procedure title "Negotiation, compensations and handling procedure document number SMP-GPB-18 issuance date 05/09/2014. Stated in the clause 2.0 land/boundary disputes where has outline the process of handling any issues related land dispute and identification of legal, customary and user rights. Identification of persons entitle to compensation also stated in the same procedure.	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 -	The management of Genting Plantations Berhad adopt the same internal procedure title "Negotiation, compensations and handling procedure document number SMP-GPB-18 issuance date 05/09/2014. The objective of the procedure is to ensure implementation of a fair compensation for any issue/ disputes related land power to claim rights, ownership, and access to land	Complied

		between parties involved in considering differences in ethnic groups' gender differences. It is also to ensure any negotiation concerning compensation are dealt with through a documented system that enables indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved. Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute.	
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 -	There is no scheme smallholder involved in 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 -	There is no land dispute reported since last audit. This has verified through interview with the stakeholders.	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.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	The management of Genting Plantations Berhad adopt the same internal procedure title "Negotiation, compensations and handling procedure document number SMP-GPB-18 issuance date 05/09/2014. The objective of the procedure is to ensure implementation of a fair compensation for any issue/ disputes related land power to claim rights, ownership and access to land between parties involved in considering differences in ethnic groups' gender differences. It is also to ensure any negotiation concerning compensation are dealt with through a documented system that enables indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved. Based on documentation review	Complied

		and interviews conducted with local communities, there is no evidence of any land dispute.	
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>	The management of Genting Plantations Berhad adopt the same internal procedure title "Negotiation, compensations and handling procedure document number SMP-GPB-18 issuance date 05/09/2014. The objective of the procedure is to ensure implementation of a fair compensation for any issue/ disputes related land power to claim rights, ownership and access to land between parties involved in considering differences in ethic groups' gender differences. It is also to ensure any negotiation concerning compensation are dealt with through a documented system that enables indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved. Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute.	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>	Not applicable since there is no issues of land has been identified.	Not Applicable
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.			
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>	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process. The legality of land was evident (as reported under 4.4.1).	Complied

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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>	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process. The legality of land was evident (as reported under 4.4.1).	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>	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process. The legality of land was evident (as reported under 4.4.1).	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>	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. No agreement-making processes and negotiated agreements detailing the FPIC process. The legality of land was evident (as reported under 4.4.1).	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>The prices for Fresh Fruit Bunches (FFB) are clearly outlined in Clause 3.0- Price Formula of the Contract Agreement between Genting Sabapalm Oil Mill and the FFB suppliers. All FFB suppliers have a copy of this contract agreement for reference.</p> <p>Current and previous period prices are made accessible to FFB suppliers by being publicly posted at the weighbridge office. These prices are determined using the Malaysian Palm Oil Board (MPOB)</p>	Complied

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		<p>Monthly Average and the Mill Oil Extraction Rate (OER) & Kernel Extraction Rate (KER).</p> <p>During interviews with a sample of FFB suppliers, it was confirmed that they were well-informed about the FFB price fluctuation mechanism as outlined in their contract agreement. Additionally, they were aware of the daily FFB prices displayed at weighbridge office when delivering their FFB.</p>	
5.1.2	<p>(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).</p> <p>- Critical (Major) compliance -</p>	<p>Verified the latest meeting with FFB Suppliers conducted on 14/06/2024. The meeting was to explain on how the FFB pricing is made to all the FFB suppliers accordingly. Total attendance for the meeting was 62 smallholders.</p>	Complied
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>The pricing is determined by the MPOB Monthly Average Price for CPO and PK, as well as the OER and KER ratings assigned by Genting Sabapalm Oil Mill, which has been confirmed through the validation of self-billed invoices from FFB suppliers. According to an interview with the management, FFB pricing will be calculated based on daily MPOB pricing for both CPO and PK, including additional costs such as CESS MPOB, Sabah Sales Tax and processing costs.</p>	Complied
5.1.4	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm Oil Mill received and processed both RSPO certified from own estate and uncertified FFB from outside smallholders' supplier and claim only the volume of oil palm products produced from processing of the certified FFB as MB certified.</p> <p>There is significant evidence showing that women have been given opportunities to participate in the decision-making process among smallholders who supply Fresh Fruit Bunches (FFB) to Genting Sabapalm POM. Document review agreement as FFB supplier with AXXXXXX Binti HXXXXX, AXXXX Binti TXXXX and SXXX NXX</p>	Complied

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		SXXXXXXX Binti WXXXX and interview session confirmed the statement.													
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Contract agreement sighted for FFB suppliers (smallholders) and stated in the agreement on agreed timeframe and there is also evidence that the contract is legal, fair, and transparent based on the verification done on the sampled contract agreement. Sample has been taken for 2 FFB supplier which are DXXXXX VXXXXX Sdn Bhd, AXXXX Bin AXXXX and TXX HXXX PXXX.	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 -	Genting Sabapalm Oil Mill guarantees that all agreed payments to external Fresh Fruit Bunch (FFB) suppliers are promptly disbursed in accordance with the contract agreement. Samples of payment statement has been taken for 2 FFB supplier in July 2024. <ol style="list-style-type: none"> 1. Payment Voucher for KXXXXXX Bin SXXXXXX - Transaction. No. 539044410100325, Payer Ref. No. 2400087714GSDC dated 11/07/2024. 2. Payment Voucher for FXXXXX SXXXXXX KXXXXX - Transaction. No. 539044410100254, Payer Ref. No. 2400087714GSDC dated 11/07/2024. 	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 -	Genting Sabapalm Oil Mill conducts regular calibration on their weighbridges used to determine the FFB tonnage for all FFB suppliers. There are 2 weighbridges used in the mill and records of yearly calibration for both weighbridges were available for verification as below: <table border="1"> <thead> <tr> <th>No</th><th>Details</th><th>Weighbridge 1</th><th>Weighbridge 2</th></tr> </thead> <tbody> <tr> <td>1</td><td>Capacity</td><td>30,000 kg</td><td>60,000 kg</td></tr> <tr> <td>2</td><td>Serial Number</td><td>240450009</td><td>162150256</td></tr> </tbody> </table>	No	Details	Weighbridge 1	Weighbridge 2	1	Capacity	30,000 kg	60,000 kg	2	Serial Number	240450009	162150256	Complied
No	Details	Weighbridge 1	Weighbridge 2												
1	Capacity	30,000 kg	60,000 kg												
2	Serial Number	240450009	162150256												

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		3	Certificate Number	SSD-ATK 003025	SSD-ATK 014967	
		4	Safety Label Number	1.4 KQ 003205	2.1 KQ 037128	
		5	Calibration Date	07/06/2024	07/06/2024	
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 -	Interview session with samples of smallholders indicated that Genting Sabapalm Oil Mill is open to providing technical assistance to independent smallholders interested in obtaining certification. It also revealed that some smallholders have achieved MSPO certification through the SPOC scheme with MPOB.				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 -	Sighted and verified Grievance Mechanism in place as outlined in the Sustainability Management Procedure Manual titled "Complaints and Grievances", Doc. No. SMP-GPB-19, Rev. No. 06, dated 15/04/2024. As of the most recent audit, Genting Sabapalm Oil Mill has not received any grievances related to the supply of Fresh Fruit Bunches (FFB) from smallholders.				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 -	There is verified evidence that management engaged in consultations with interested smallholders during a stakeholders' meeting held on April 14, 2023. This confirmation comes from direct interviews with the smallholders. Currently, the smallholders have not shown any interest in pursuing RSPO certification.				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	Genting Sabapalm Oil Mill has implemented a support program that involves consultations and recommendations provided to smallholders by agronomists. The details of the shared information to enhance production of FFB, best management practices in				Complied

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	competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	managing oil palm trees and compliance to RSPO requirement were stated in external stakeholder consultation minutes meeting on 14/06/2024	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Not applicable since all smallholders delivering to Genting Sabapalm Oil Mill are required to have valid MPOB licenses by law. Additionally, copy of land title and copy of MPOB License for sample of smallholders were reviewed to confirm the legality.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Not applicable since there is no scheme smallholders.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Management Review Meeting was conducted for the entire certification unit at the mill, conducted on 05/08/2024 which discussing on status of smallholder support program. It was reviewed annually and monitored accordingly.	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 -	The management has established Social Policy dated 14/09/2020 signed by Tan Wee Kok, President & Chief Operating Officer. As a responsible of the organization, the company committed to ensure that our workers and employees are treated fairly, equally and with respect according to local, national and rectified international laws. The management shall not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, age, disability, gender, marital status, union membership or political affiliation.	Complied

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		Based on the interview sessions with workers and external stakeholders, it was understood that the policy is readily accessible, having been posted on the company's website and the notice boards of the operating units. Additionally, both internal and external stakeholders were briefed on the policies during consultation sessions.	
6.1.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>There is no discrimination against local communities, women, migrant workers based on document reviews and interviews with sampled employees from each operating units based on nationality, gender, age, type of work, race and religious including charging on recruitment fees for foreign workers.</p> <p>The company has provided employment contract for all workers. The employment contract adopts by the estates and mill as part as requirement to ensure the workers employment conditions received as accordingly.</p> <p>Review on the sampled of employment contracts verified terms and conditions outlined as per on Sabah Labour Ordinance. They have been paid based on piece rates or daily rates as per current minimum wages order and they have rights to choose to do overtime if requested.</p> <p>The management has provided free housing facilities to staff and employees. Basic amenities such as water, electricity, football field etc. were provided to the workers. The housing condition was in accordance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446).</p> <p>There is no recruitment fee has been charges to new foreign workers.</p> <p>There is no complain on discrimination received by the company during the audit period.</p>	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>The management has established the Foreign Workers Ethical & Responsible Recruitment Procedures (Doc No: GEN-13, Rev 06, Issue date 17/10/2023) that covered Zero Recruitment Cost Policy, Recruitment Fees and other costs, Human Resources and Administrative Department, Recruitment Agencies, Recruitment Procedure, Abscondment of Foreign Workers, Renewal/Extension of Work Permit and passports, repatriation-completion of contract/termination/retirement and others.</p> <p>The company has provided employment contract for all workers. The employment contract adopts by the estates and mill as part as requirement to ensure the workers employment conditions received as accordingly.</p> <p>Every employee has his own file which keeps their details including medical history, employment contract, offer letter, confirmation letter, appraisal, etc.</p> <p>It is stated in the letter of appointment that the company practise no discrimination and provide fair treatment to every employee as evident in indicator 6.2.2.</p> <p>While interview with sample workers, it was confirmed that opportunity for promotion is determined by competency, proficiency, attributes, and the medical clearance aligned with the job specifications. In addition, workers also provided with appropriate number of training based on their current job description.</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>Onsite interviewed with sampled female workers and Medical Assistant (MA) informed no pregnancy testing conducted as a discriminatory measure prior to work. They still will be able to offer for work if they are pregnant however with light duty task.</p>	Complied

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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>Evident the appointment letter of the gender committee member as per 'Surat Perlantikan Sebagai Ahli Jawatankuasa Wanita dan Kanak-kanak di Genting Sabapalm' / Letter of Appointment as a Member of the Women and Children's Committee in Genting Sabapalm and part of the responsibilities:</p> <ol style="list-style-type: none"> 1. Assist the estate in forming guidelines to prevent sexual harassment in the work system. 2. Conduct investigations into complaints of sexual harassment and related matters and help prepare reports for the estate. 3. Assist the Women and Children committee to conduct investigations when there is any incident of sexual harassment at the workplace. <p>The Gender Committee Meeting for GSOM has been carried out on 20/07/2024 attended by 12 person and the agenda comprises of briefing on Sexual Harassment Policy, Complaint Procedure for Sexual Harassment, matter arising. There is no case has been reported since last audit.</p> <p>Gender committee meeting for GSPE has been conducted on 21/02/2024 and attended by 8 person and the agenda of the meeting consists of complaint from workers, matters arising and suggestion on activities. The issue has been reported related to sexual harassment and abuse.</p> <p>Evident 'Rekod Penilaian & Keperluan Bakal & Ibu Baru' / Records of Evaluation & Needs of Prospective & New Mothers (Newborn 0-</p>	Complied
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		<p>24 months). The scope applies to new mothers before and after the birth of their child. The sample as below:</p> <ol style="list-style-type: none"> Employee ID C203XXXX - giving permission to the employer to carry out a work risk assessment for myself due to pregnancy or childbirth dated 02/09/2023. I understand the purpose of this consultation. The mother has made preliminary preparations before and after the birth. Mother has stamped her birth certificate in JPN. 	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>As per sample of workers that was taken from different category but same work scope, it has been identified that all workers has been paid equally. Verification has been done through interview with the workers and review of pay slips.</p> <p>Evident personal files that comprise the employment contract, identification card, passport, visa, driving license, pay slips, SOCSO and EPF contributions, application for employment, education certificates, etc. as per indicator 6.2.2.</p>	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	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>There is no collective agreement for both Genting Sabapalm POM and Genting Sabapalm Estate since there is no union has been established or existed in both operating units. Pays and conditions based on Sabah Labour Ordinance, employment contract, and others permit that applicable.</p> <p>Employment Contract of Genting Plantation Comprises of Name, ID, address, Position, contract duration, contract service, probation period, retirement period, work location, transfer of work location, worker responsibilities, Levy, Visa, salary, day and working hour, overtime, rest day, work on rest day & public holiday, housing and</p>	Complied

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		<p>accommodation, transport to workplace, tools, medical, medical leave, maternity leave, annual leave, insurance/compensation, EPF Contribution, salary payment, salary deduction, safety and health, termination, notice for resignation, return journey fare, passport and visa keeping, etc. The agreement was prepared in Bahasa Melayu and all workers including Indonesian and Philippines workers understand local language.</p> <p>While piece rate works, it has been documented approved by the management and will be revised on annual basis if there is any requirement. As per interview, the rate has been done based on the motion study conducted and average earning per workers and productivity.</p>	
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>Employment Contract of Genting Plantation Comprises of Name, ID, address, Position, contract duration, contract service, probation period, retirement period, work location, transfer of work location, worker responsibilities, Levy, Visa, salary, day and working hour, overtime, rest day, work on rest day & public holiday, housing and accommodation, transport to workplace, tools, medical, medical leave, maternity leave, annual leave, insurance/compensation, EPF Contribution, salary payment, salary deduction, safety and health, termination, notice for resignation, return journey fare, passport and visa keeping, etc. The agreement was prepared in Bahasa Melayu and all workers including Indonesian and Philippines workers understand local language.</p> <p>Evident personal files that comprise the employment contract, identification card, passport, visa, driving license, pay slips, SOCSO and EPF contributions, application for employment, education certificates, etc for the following workers:</p> <p><u>Genting Sabapalm Oil Mil</u></p>	Complied

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		Workers	Salary	Gender	Nationality	
		EE00XXX Workshop	April 2024 RM3134.75 OT - 51 hours OT (RD) – 5 hours ND -24 WRD – 3 hours PH – 2 days July 2024 RM2730.90 OT – 64 hours OT RD – 5.5 hours WND – 26 days WRD – 2 days PH – 1 day	M	Philippine – Under Smart Sabah dated 21/05/2024 – barcode: 80000078	
		EE00XXX WB Operator	April 2024 Rm2150.36 OT – 7 hours OT (RD) – 15.50 hours	F	Malaysia	

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			ND – 22 days WRD – 4 days PH – 2 days UP – 2 days July 2024 Rm2260.76 OT – 14 hours OT (RD) – 10.50 hours OT (PH) – 2.50 hours ND – 24 days WRD – 3 WPH - 1 PH - 2 UP – 2 days			
		E00XXX Store	April 2024 Rm1802.01 OT – 33.50 hours ND – 20 days PH – 2 days	F	Malaysia	

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			UP – 3 days AL – 1 day July 2024 Rm2190.48 OT – 40.50 hours ND – 20 days WRD – 1 day PH – 1 day UP – 1 days AL – 1 day			
		E00XXX Effluent and Land Application	April 2024 RM2037.26 OT – 23 hours OT (RD) – 4 hours ND – 24 days WRD – 2 days PH – 2 days July 2024 RM2037.26	M	Indonesia Passport valid to 06/11/2033 and visa valid to 18/01/2025	

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			OT – 23 hours OT (RD) – 4 hours ND – 24 days WRD – 2 days PH – 2 days			
		E00XXX Shift A	April 2024 RM2478.07 OT – 62 hours OT (RD) – 5 hours ND – 24 days WRD – 1 day PH – 2 days July 2024 Rm2161.58 OT – 24.50 hours OT (RD) – 7.5 hours ND – 26 days WRD – 2 days PH – 1 day	M	Malaysia	
		E00XXX	April 2024	M	Indonesia	

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		Shift B	RM2446.29 OT – 47 hours OT (RD) – 8.50 hours WND – 24 days WRD – 1 day PH – 2		Passport valid to 08/01/2028 and visa valid to 12/04/2025	
		E00XXX Shift C	April 2024 RM1499.94 ND – 22 days PH – 2 days AL – 2 days	F	Indonesia Passport valid to 17/07/2027 and visa valid to 21/02/2025	
		E00XXX Driver Tanker	April 2024 RM5057.63 OT – 6.5 hours OT RD – 11 hours WND – 24 days WRD – 3 days PH – 2 days	M	Malaysia	
		Remarks: Overtime - OT, Overtime on Rest Day - OT (RD), Overtime on Public Holiday - OT (PH), Normal Day – ND, Work on Rest Day –				

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		<p>WRD, Work on Public Holiday – WPH, Public Holiday – PH, Unpaid – UP, Absent – AB, etc.</p> <p>Sample Permit from JTK:</p> <p>Women's Night Work Permit/ Permit Wanita Kerja Malam Seksyen 75, Ordinan Buruh Sabah (Sabah Bab 67) – between 10.00pm to 5.00 am. and the conditions set. rest period free from work for 11 continuous hours. weekly rest leave of not less than 30 continuous hours. Valid from 23/09/2022 – 22/09/2024. Serial No.: JTKSBH/PMT/75/2022/0028.</p> <p>Evident Overtime Restriction Permit / 'Permit Sekatan Kerja Lebih Masa' – The maximum limit of overtime allowed in a month is 120 hours. Employees are not allowed to work more than 12 hours except under certain conditions and employees cannot be allowed to work more than 5 hours in a row.</p> <p>Sample of Medical Leave Series No: 05738 dated 06/08/2024 – Left & right-hand cramps given by Clinic Attendant.</p> <p>Sample annual leave application for Sumairah Kartadimaja from 10/08/2024 to 12/08/2024 for 2 days.</p> <p>Genting Sabapalm Oil Mill has made EPF contribution for all employees, Employer Ref No: 602012204 for the month of July (08/2024) with printed date 02/08/2024. The SOCSO contribution, Employer code: F9600017737Y for July 2024 (07/2024).</p> <p><u>Genting Sabapalm Estate</u></p> <table> <tr> <th>Workers</th><th>Salary</th><th>Gender</th><th>Nationality</th></tr> </table>	Workers	Salary	Gender	Nationality	
Workers	Salary	Gender	Nationality				

		E10XXX Field Worker	<p>April 2024</p> <p>RM1945.84</p> <p>Piece rate work</p> <p>PH – 2 days</p> <p>RD – 4 days</p> <p>July 2024</p> <p>RM1454.70 – piece rate</p> <p>MC – 1 day</p> <p>PH – 1 day</p> <p>RD – 4 days</p> <p>UP – 3 days</p> <p>Piece rate work -23 days</p>	M	<p>Indonesia</p> <p>Passport valid to 13/02/2033 and visa valid to 23/02/2025</p>	
		E11XXX GW – Boatman Agreement signed on 6.12.2021	<p>April 2024</p> <p>Rm2202.62</p> <p>OT – 24 hours</p> <p>ND – 24 days</p> <p>PH – 2 days</p> <p>RD – 4 days</p>	M	Malaysia	

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			July 2024 Rm2328.68 OT – 31.50 hours OT (PH) – 2.50 hours ND – 26 days PH – 1 day RD – 4 days			
		E11XXX Field worker – agreement date 02/01/2024	April 2024 Rm1520.14 OT – 4 hours ND – 22 days PH – 2 days RD – 4 days UP - 2 July 2024 Rm1733.36 OT – 7 hours ND – 26 days PH – 1 days RD – 4 days	F	Malaysia	

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		<div>E00XXX</div> <div>Field Worker – manuring – agreement date 22/02/2023</div>	<div>April 2024</div> <div>RM1499.94</div> <div>ND – 24 days</div> <div>PH – 2 days</div> <div>RD – 4 days</div> <div>July 2024</div> <div>RM1557.63</div> <div>ND – 6 days</div> <div>PH – 1 day</div> <div>RD – 4 days</div>	M	<div>Indonesia</div> <div>Passport: 27/02/2033 and visa 21/02/2025</div>	
		<div>E11XXX</div> <div>Field worker- Contract Agreement dated 01/02/2022</div>	<div>April 2024</div> <div>RM1633.25</div> <div>ND – 23 days</div> <div>PH – 2 days</div> <div>AB – 1 day</div> <div>RD – 4 days</div> <div>July 2024</div> <div>Rm1609.58</div> <div>ND – 22 days</div>		<div>Indonesia</div> <div>Passport valid to 19/08/2027 and visa valid to 08/12/2024</div>	

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			MC - 2 days PH – 1 day AB – 2 days RD – 2 days Remarks: Sijil Cuti Sakit (Serial No: 05122) MC – on 20/07/2024 and (Serial No: 05123) MC on 23/07/2024.			
		E11XXX Field worker Contract agreement dated 01/01/2023	April 2024 RM2123.07 Piece rate work – 20 days PH – 2 days AB – 4 days RD – 2 days July 2024 RM 2063.67 Harvesting – 25 days AB – 1 day	F	Indonesia Passport valid to 19/08/2027 and visa valid to 08/12/2024	

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			RD – 4 days WPH – 1 day			
		E11XXX Harvester Contract Agreement dated 01/03/2024	April 2024 RM2495.78 Harvesting – 24 days PH – 2 days Piece rate work – 4 days July 2024 RM2006.63 Harvesting – 26 days RD – 1 day WPH – 1 day	M	Indonesia Passport valid to 10/11/2033 and visa 29/06/2025	
		E10XXX Harvester Contract Agreement 17/02/2020	April 2024 RM4448.36 Harvesting – 24 days PH – 1 day RD – 2 days WPH – 1 day	M	Indonesia Passport 14/02/2025 and visa valid till 06/02/2025	

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			July 2024 RM2693.98 Harvesting – 26 days RD – 1 day WPH – 1 day			
		E10XXX Harvester Contract Agreement dated 01/03/2024	April 2024 RM3245.07 Harvesting – 23 days PH – 2 days AB – 1 day July 2024 RM2693.98 Harvesting – 26 days RD – 1 day	M	Indonesia Passport valid to 19/11/2026 and visa valid to 08/02/2025	
		E10XXX Driver Mini Grabber Contract Agreement 20/02/2023	April 2024 RM1557.63 ND – 25 days PH – 2 days RD – 4 days	M	Indonesia Passport valid to 19/02/2033 and visa valid to 21/02/2025	

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		<p>July 2024</p> <p>RM1557.63</p> <p>ND – 26 days</p> <p>PH – 1 day</p> <p>RD – 4 days</p>			<p>Remarks: Overtime - OT, Overtime on Rest Day - OT (RD), Overtime on Public Holiday - OT (PH), Normal Day – ND, Work on Rest Day – WRD, Work on Public Holiday – WPH, Public Holiday – PH, Unpaid – UP, Absent – AB, etc.</p> <p>Sighted Leave Application Form – Hendrikus Yohanes – dated applied 13/08/2024, leave from 16/08/2024 and 17/08/2024. Evident Maternity Benefits Entitlement Verification Checklist for Muliati binti Kandare (E00074) (C9622843) and Maternity Leave Period from 14/03/2024 to 13/05/2024 (60 days), attendance during pregnancy 161 days and date start to abstain from work will 01/03/2024.</p> <p>Evident SOCSO, Employer Code: F9700005XXXW, contribution on 07/2024.</p> <p>Contractor</p> <p>Samples:</p> <p>Agreement No: GSPE/MOA/23/06/05 dated 01/08/2023 between the Genting Sabapalm Estate and Syarikat C.M and the agreement valid to 31/12/2023 for Replanting Works. Addendum to contract agreement contract no: GSPE/MOA/23/06/05. The contract work will be ended from 31/12/2023 to 31/05/2024.</p> <p>Samples of workers:</p>
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		<ol style="list-style-type: none"> 1. Employment contract, E293XXXX as excavator driver with monthly salary RM1500 starting from 31/07/2023. Salary on July 2024, RM2432.70 with commission, ND – 26 days, PH – 1 day, RD – days. Passport valid to 20/07/2033 and visa (25/07/2024) in the process of renewal as evident in the Official Receipt Malaysia Immigration Department dated 12/07/2024 and reference no: BPA/12091/PGAMP22553. 2. Employment contract date 01/04/2023, E216XXXX as Mechanic Assistant with monthly salary RM1800. Salary on July 2024, RM2500.00 with commission, ND – 26 days, PH – 1 day, RD – days. Passport valid to 29/03/2033 and visa valid till 25/04/2025. 	
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>All estates have registered all their workers into Employee Master Details List. All the daily attendance and overtime work were recorded in the Daily attendance record and payroll system. The wages details were attached in the payslip including the overtime, harvesting bunch weights, allowance, number of working day (on normal day, rest day, public holiday, annual leave, sick leave, unpaid leave, absent, etc).</p> <p>Onsite interview with sampled workers informed working hours, break time, deductions, overtime, sickness, holiday entitlement, maternity leave, and others is according to employment contract and employment act. Overtime offered to workers is voluntarily upon mutually agreement between management and workers including compliance by contractor as per their Letter of Award. Refer 6.2.2</p>	Complied
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</p>	<p>Genting Sabapalm POM and Genting Sabapalm Estate has conducted line site inspection on weekly basis. Water and electric have been provided for free to all employees which extracted from nearby pond, electricity from Sabah Electricity and back up with</p>	Complied

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	<p>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>genset for electricity. Clinic has been established in the mill and estate area with medical assistant.</p> <p>HUMANA School has been established to provide education to Indonesian kids. There is also primary school, SK Ladang Sabapalm located inside the estate compound and the management provided transport for kids to travel to secondary school. Houses are equipped with 2 or 3 bedrooms and a bathroom. As per site visit for both Sabapalm Estate and POM sighted that each family has been provided one house while for single workers, one room has been provided. Currently 70% of the wooden worker quarters have been replaced with new house in staggered.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There is sundry shops and canteens inside the estate and there is nearest town from the estate and mill. Some of the operating units provide transport to the nearest town. The workers have alternative to take bus or taxi to the town and some have their own transport.</p> <p>Apart from that, all the workers are provided with free medical facilities located at the mill or nearby panel clinic and Klinik Kesihatan Tagas-Tagas. Free housing facilities were provided to all the workers and their families such as subsidised electricity and water, mosque, temples, hall, playground, creche, kindergarten, school bus, allowances, bonuses, etc.</p>	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,</p>	<p>There are no changes compared to last year where Genting Plantations Berhad adopted the same prevailing wage calculation last updated on 27/05/2022 to include all the in-kind benefits provided to the workers in Genting Sabapalm Estate and Genting Sabapalm Oil Mill. In-kind benefit calculated is RM 991.78 and average take home salary is around RM1700. The prevailing wages is more than the Minimum Wage Order 2022.</p>	Complied

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	<p>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 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 		
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	<ul style="list-style-type: none"> 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>		
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>The management adopted the company employment contracts includes with the details of payments and conditions of employment to the permanent workers employed as per samples sighted in indicator 6.2.2 above.</p> <p>Document review on workers master list, sighted no casual, temporary and day labour employed within all operating units.</p>	Complied
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.			
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>The management has established Social Policy dated 14/09/2020 signed by Tan Wee Kok, President & Chief Operating Officer. As a responsible of the organization, the company committed to ensure that our workers and employees are treated fairly, equally and with respect according to local, national and rectified international laws. Mentioned the policy, the management shall respect the rights of our workers to join or form legal trade unions of their choosing and to bargain collectively.</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><u>Genting Sabapalm Oil Mill</u></p> <p>The latest Workers Welfare Meeting for Genting Sabapalm Oil Mill has been conducted on 27/06/2024 attended by 7 committee members out of 11.</p> <p><u>Genting Sabapalm Estate</u></p>	Complied

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		<p>The latest Workers Welfare Meeting for Genting Sabapalm Oil Mill has been conducted on 19/06/2024 attended by 9 committee members out of 11.</p> <p>The agenda of the meeting including briefing on:</p> <ol style="list-style-type: none"> 1. Abuse of Vulnerability 2. Debt bondage 3. Deception 4. Retention of identity documents 5. Withholding of wages 6. Excessive overtime 7. Isolation 8. Restriction of movement 9. Abusive working and living condition. 10. Intimidation and threats 11. Physical and sexual violence 12. Feedback form for all committee member 13. Any matters arising. <p>The samples of report from committee members / workers representative:</p> <ol style="list-style-type: none"> 1. The problem of buffalo entering the employee housing area - wait for quotation - CQ24/05/886 dated 28/07/2024 and MQT24080009 dated 29/07/2024 for fencing. 2. Block G1 – mosquito net broken - has been settled on 14/07/2024 as evident in the Complaint/Enquiry received. 3. Block H3 – mosquito net broken - has been settled on 14/07/2024 as evident in the Complaint/Enquiry received. <p>The worker's representative has been nominated by all workers and evident the name that has been appointed by voting. The</p>	
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		management appointed as Welfare Committee based on the voting results as per indicator 6.3.3. The minutes meeting has been documented in local language. Based on the interview with foreign workers such as Philippine and Indonesia, they understood local language.	
6.3.3	<p>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.</p> <p>- Minor compliance -</p>	<p>The worker's representative has been nominated by all workers and evident the name that has been appointed by voting. The management appointed as Welfare Committee on 08/10/2022 based on the voting results as below:</p> <p><u>Genting Sabapalm Oil Mill</u></p> <ol style="list-style-type: none"> 1. Chairman – Pn Sabtariah binti Abu Bakar 2. Secretary – Pn Surianti binti Mayah 3. Member – En Sakka bin Masse (Indonesian) 4. Member – Pn Mawar binti Lammai (Indonesian) 5. Member – Joseph Gaung 6. Member – Md Isa bin Kahar 7. Member – Eko bin Rahmat (Indonesian) 8. Member – Jason John 9. Member - Walidi Saimin 10. Member – Usman bin Mase (Indonesian) 11. Member – Agus bin Subala <p><u>Genting Sabapalm Estate:</u></p> <ol style="list-style-type: none"> 1. Chairman – Budi bin Padu 2. Assistant Manager - Razalie bin Sufian 	Complied

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		3. Secretary – Hasni binti Suli 4. Member – Alosus Jannu (Indonesian) 5. Member – Kana Anak Lawing 6. Member – Zainal Arifin 7. Member – Arisa Pondin Salilan (Indonesian) 8. Member – Sulaiman bin Madanreng (Indonesian) 9. Member – Fauzih bin Nanro (Indonesian) 10. Member - Ismail Ligad Leliza (Indonesian) 11. Member - Yohanis Tafuli (Indonesian)	
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 adopt the same policy for protection of children including prohibition of child labour in the document title Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where the company shall not use any child labour. Children's right is respected. There was specific clause under 2.6 of the agreement with contractors mentioned the contractor shall ensure no minor (Below 18 years old) are employed.	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 -	The management of each operating units follows requirement as per stated in local regulations which is "Akta Kanak-Kanak Dan Orang Muda (Pekerjaan) (Pindaan)" 2019 where persons under 16 and below has been classified as children and young workers has been classified between 16-18 years. As per sampled personal file for both operating units, there are evidence that all workers recruited were above 18 years. Age screening verification procedure has been documented in the recruitment procedure title "Procedural Instruction Foreign Workers Ethical & Responsible Recruitment Procedure document number GEN-12 dated 17/05/2022.	Complied

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		Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements of 18 years old are met throughout Genting Sabapalm POM and estate. Personnel files contain copies of the workers' NRIC (for Malaysians) and passports (for non-Malaysians). These documents were used to screen age of the workers when they applied for the job. Visit to the linesite and field also did not reveal any persons under 18 years old are working.	
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 -	Review from the master list of workers for both estate and POM and interview with the workers, confirmed that there are no young workers has been recruited.	Complied
6.4.4	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. - Minor compliance -	The policy has been communicated during internal and external stakeholders' consultation and training as per indicator 1.1.4.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Genting Plantations Berhad adopt the same policy as previous audit and documented in the document Sexual Harassment Policy dated 03/08/2009 was developed to ensure harassment-free environment and avoid behaviour that may create an atmosphere of hostility and intimidation of any kind at the workplace. Other than that, it has been stated in the Social policy dated 14/09/2023 which clearly stated that physical abuse or discipline the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidations shall be prohibited. Other than that, for female workers, there is specific procedure has been established in the document title Procedure on Prevention and Eradication of Sexual Harassment at the Workplace document	Complied

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		<p>number SMP-GPB-20 dated January 2023. Stated in the procedure, any complaint related to female can be lodge through gender committee, immediate supervisor, head of department or Human resources and administration department (HRAD) Stated in the procedure will be given option of access to independent legal and technical advice, to choose individuals or groups to support them and act as observer as well as the option of third-party mediator.</p> <p>The policy has been communicated during internal and external stakeholders' consultation and training as per indicator 1.1.4.</p> <p>The Gender Committee Meeting for Genting Sabapalm Oil Mill (GSOM) has been carried out on 20/07/2024 attended by 12 person and the agenda comprises of briefing on Sexual Harassment Policy, Complaint Procedure for Sexual Harassment, matter arising. There is no case has been reported since last audit.</p> <p>While Gender committee meeting for Genting Sabapalm Estate (GSPE) has been conducted on 21/02/2024 and attended by 8 person and the agenda of the meeting consists of complaint from workers, matters arising and suggestion on activities. The issue has been reported related to sexual harassment and abuse.</p> <p>Communication of the Genting's commitment towards harassment-free environment was confirmed during interview with sample workers. Beside awareness during gender committee meeting, the policy also briefed during morning roll call to all workers.</p>	
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>Genting Plantations Berhad has implemented a Social Policy (Incorporating the Labour and Human Rights requirements) dated 22/6/2015. In the policy statement, it mentioned that reproductive rights are protected.</p> <p>The policy has been communicated during internal and external stakeholders' consultation and training as per indicator 1.1.4.</p>	Complied

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		<p>The Gender Committee Meeting for Genting Sabapalm Oil Mill (GSOM) has been carried out on 20/07/2024 attended by 12 person and the agenda comprises of briefing on Sexual Harassment Policy, Complaint Procedure for Sexual Harassment, matter arising. There is no case has been reported since last audit.</p> <p>While Gender committee meeting for Genting Sabapalm Estate (GSPE) has been conducted on 21/02/2024 and attended by 8 person and the agenda of the meeting consists of complaint from workers, matters arising and suggestion on activities. The issue has been reported related to sexual harassment and abuse.</p> <p>During interviews with a sample of workers, it was confirmed that Genting's commitment to promote reproductive rights is communicated effectively. The policy is not only highlighted during the morning roll call for all workers but also reinforced in gender committee meetings to raise awareness.</p>	
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>Evident 'Rekod Penilaian & Keperluan Bakal & Ibu Baru' / Records of Evaluation & Needs of Prospective & New Mothers (Newborn 0-24 months). The scope applies to new mothers before and after the birth of their child. The samples as below:</p> <ol style="list-style-type: none"> 1. Employer ID, C203XXXX - giving permission to the employer to carry out a work risk assessment for myself due to pregnancy or childbirth dated 22/12/2023. Evaluator's Note, mothers understand very well about preparations before pregnancy, during pregnancy and after giving birth. Understand the importance of pregnancy planning. The child has been registered and the birth certificate at JPN. 2. Employer ID, C203XXXX - giving permission to the employer to carry out a work risk assessment for myself due to pregnancy or childbirth dated 02/09/2023. I understand the purpose of this consultation. The mother has made 	Complied

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		preliminary preparations before and after the birth. Mother has stamped her birth certificate in JPN.	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>There is specific procedure has been established in the document title Procedure on Prevention and Eradication of Sexual Harassment at the Workplace document number SMP-GPB-20 dated January 2023. Stated in the procedure, any complaint related to female can be lodge through gender committee, immediate supervisor, head of department or Human resources and administration department (HRAD) Stated in the procedure will be given option of access to independent legal and technical advice, to choose individuals or groups to support them and act as observer as well as the option of third-party mediator.</p> <p>The policy has been communicated during internal and external stakeholders' consultation and training as per indicator 1.1.4 and their understanding of the grievance mechanism has been confirmed during interview session with sample of workers.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <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 	<p>Based on interviews with the workers, and observations made as per indicator 6.2.2, the following were found:</p> <p>Retention of documents: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Some Indonesian and Philippine workers has been interviewed and confirmed that passport has been kept by the workers itself. It has been confirmed during site visit to line site where verification passport has been kept at their house.</p> <p>Charging of recruitment fee: Workers are not charged any recruitment fees. Interviews conducted with workers also confirmed that they have not been charged any recruitment fees.</p>	Complied

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	- Critical (Major) compliance -	<p>Contract substitution: Based on document review, worker interview and site tour, it was noted all the migrant workers are legally recruited. Interview with the sampled workers confirmed that they have entered employment by voluntarily and freely basis. They also informed that all contract signed in their origin country is consistent with the terms and condition that they received upon arrival.</p> <p>Involuntary overtime: Based on interviews conducted with the workers, all overtime work were carried out on a voluntary basis. Workers are free decline any offers for overtime work.</p> <p>Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with workers.</p> <p>Penalty for termination of employment: Based on the interview and employment contract review, there is no evidence to suggest that workers are being penalized for the termination of employment when appropriate justifications and reasons are provided.</p> <p>Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview where there is no debt has been given to the workers. The is also no recruitment fee has been charged to the workers hence confirmed that there is debt bondage implement.</p> <p>Withholding of wages: There is no evidence of withholding of wages.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The company adopt the same policy document in the document title Social Policy dated 14/09/2020 and People Policy dated 03/08/2009. Besides, Procedures for Social Management (Doc. No.: SMP-GPB32, Rev. 01 dated April 2021) was developed and implemented where the migrant workers are provided with safe living condition, post-arrival orientation on the employment condition, safety & health,</p>	Complied

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		sustainability and law & regulations. No discrimination, no recruitment fee and no contract substitution was implemented in the company.																
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	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Estate and mill management has established a Safety Committee, with members including a secretary, representatives from both the employer and employees. These appointments are in line with the appointment letter issued by the Estate Manager. The quarterly meeting agenda covers items such as matters arising from the previous meeting, reports from workplace inspections, updates on the training program and its implementation, discussions on safety issues in the workplace, review of accident cases, consideration of HIRARC, and other safety-related concerns.</p> <p>Reviewed latest safety minutes meeting for operating unit:</p> <table><tr><td>Operating Unit</td><td>3rd meeting (2023)</td><td>4th meeting (2023)</td><td>1st meeting (2024)</td><td>2nd meeting (2024)</td></tr><tr><td>Genting Sabapalm Oil Mill</td><td>11/06/2024</td><td>22/09/2023</td><td>11/03/2024</td><td>11/06/2024</td></tr><tr><td>Genting Sabapalm Estate</td><td>23/08/2023</td><td>23/11/2023</td><td>27/02/2024</td><td>21/05/2024</td></tr></table>	Operating Unit	3 rd meeting (2023)	4 th meeting (2023)	1 st meeting (2024)	2 nd meeting (2024)	Genting Sabapalm Oil Mill	11/06/2024	22/09/2023	11/03/2024	11/06/2024	Genting Sabapalm Estate	23/08/2023	23/11/2023	27/02/2024	21/05/2024	Complied
Operating Unit	3 rd meeting (2023)	4 th meeting (2023)	1 st meeting (2024)	2 nd meeting (2024)														
Genting Sabapalm Oil Mill	11/06/2024	22/09/2023	11/03/2024	11/06/2024														
Genting Sabapalm Estate	23/08/2023	23/11/2023	27/02/2024	21/05/2024														
6.7.2	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	Accident and emergency protocols have been established, including the formation of an Emergency Response and Preparedness (ERP) Team for identified incidents. These procedures, encompassing fire, chemical spillage, flood, and workplace accidents, have been condensed into a flowchart and prominently displayed for all estate and mill employees. Detailed instructions can be found in the	Complied															

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	<p>equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Emergency Response Procedure, Doc. No. SP-MGR-04, dated 01/08/2023</p> <p>The ERP team's organizational chart has been established and shared with employees, accompanied by essential telephone contact information. Guidelines were issued by the SPO (presumably Safety and Preparedness Officer) and adapted to suit variations in the situations within the estates and mill.</p> <p>Verified training related to ERP was conducted as table below:</p> <table><tr><th>Operating Unit</th><th>Date</th></tr><tr><td>Genting Sabapalm Oil Mill</td><td>24/07/2024 – Emergency Preparedness/Fire Drill Training</td></tr><tr><td>Genting Sabapalm Estate</td><td>26/03/2024 – Fire & Emergency Response Procedure Training</td></tr></table> <p>It was noted that Emergency Response Team was updated as per Jan 2024. The team consists of representatives from both workers and staff who will serve as the frontline in case of an emergency.</p> <p>Monthly First Aid inspection record and updates was conducted by each Medical Assistant (MA) as table below:</p> <table><tr><th>Certification Unit</th><th>Date of Latest Monthly Inspection</th></tr><tr><td>Genting Sabapalm Oil Mill</td><td>25/07/2024</td></tr><tr><td>Genting Sabapalm Estate</td><td>07/08/2024</td></tr></table> <p>The operating units consistently document accident-related information, including JKPP 6 forms submitted to the Department of Safety & Health, medical leave certificates, accident investigation reports, and reviews of Hazard Identification, Risk Assessment, and Risk Control (HIRARC). According to JKPP 8 submission report for</p>	Operating Unit	Date	Genting Sabapalm Oil Mill	24/07/2024 – Emergency Preparedness/Fire Drill Training	Genting Sabapalm Estate	26/03/2024 – Fire & Emergency Response Procedure Training	Certification Unit	Date of Latest Monthly Inspection	Genting Sabapalm Oil Mill	25/07/2024	Genting Sabapalm Estate	07/08/2024	
Operating Unit	Date														
Genting Sabapalm Oil Mill	24/07/2024 – Emergency Preparedness/Fire Drill Training														
Genting Sabapalm Estate	26/03/2024 – Fire & Emergency Response Procedure Training														
Certification Unit	Date of Latest Monthly Inspection														
Genting Sabapalm Oil Mill	25/07/2024														
Genting Sabapalm Estate	07/08/2024														

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		Genting Sabapalm Oil Mill	Loading Ramp	01/07/2024		
		Genting Sabapalm Estate	Sprayers	18/07/2024		
6.7.4	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. - Minor compliance -	Noted that all employees receive medical care known as SOCSO contribution, and a review of workers' profile records indicates that every worker is covered by accident insurance.			Complied	
		Certification Unit	Month	Total Workers		Amount
		Genting Sabapalm Oil Mill	July 2024	77		RM5,141.00
		Genting Sabapalm Estate	July 2024	402		RM14,828.60
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Records of accidents were documented accordingly. It was verified that Records of Lost Time Accident (LTA) metrics were consistently maintained. Observed samples of accident statistics for Year 2023 as reported to DOSH are as follows:			Complied	
		Operating Unit	Accidents Reported	Lost Time Accident (LTA)		Reference No.
		Genting Sabapalm Oil Mill	-	-		JKKP 8/156286/2023
		Genting Sabapalm Estate	5	77 days		JKKP 8/152961/2023

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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.			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm Estate continued to monitor the Implementation of Integrated Pest Management (IPM) plans. a) The estate had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides.</p> <ul style="list-style-type: none"> Planting beneficial plants such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, along the roadsides and designated points in the fields and within the nursery perimeter. Establishment of single layer EFB mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. Census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year were recommended by the GM /Agronomist. Baiting is continued until bait acceptance threshold level. 	Complied
7.1.2	<p>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.</p> <p>- Minor compliance -</p>	<p>This is not practiced in the estate visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM. The estate have declared this compliance in the status of IPM species invasiveness.</p>	Complied

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7.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>As outlined in Zero Burning Policy, signed by the President & Chief Operating Officer, dated 10/08/2011, Genting Plantations Berhad mandates zero tolerance for fire use, effective monitoring and prevention systems, and protective firefighting measures to protect forests and wildlife and minimize carbon emissions. Limited open burning was also emphasized but only allow for cooking and religious purposes under appropriate supervision.</p> <p>During the visit to P24, where replanting was recently completed in June 2024, no evidence of fire being used for pest control was observed.</p>	Complied								
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.											
7.2.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>The use of pesticides was conducted in accordance with the Sustainability Management Procedure, Justification of Pesticides Used, Document No. SMP-GPB-28, dated 17/03/2015. Justifications were documented in the SOP and the Pictorial Safety Standard Book for various field operations. The selection of chemicals was tailored to address the specific target pest, weed, and disease.</p> <p>Sighted and reviewed chemical register and confirmed that all operating units confined usage to only class II, class III & class IV pesticides.</p>	Complied								
7.2.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides used (including active ingredients used and their Lethal Dosage (LD 50), area treated, amount of a.i. applied per ha and number of applications) is maintained by the estate. Sighted Pesticide Usage Monitoring Record from year 2021 to 2023 was available and summarize as table below:</p> <table border="1"> <tr> <td></td><td>2021</td><td>2022</td><td>2023</td></tr> <tr> <td>Kg pesticide/planted Ha</td><td>2.20</td><td>3.81</td><td>3.44</td></tr> </table>		2021	2022	2023	Kg pesticide/planted Ha	2.20	3.81	3.44	Complied
	2021	2022	2023								
Kg pesticide/planted Ha	2.20	3.81	3.44								

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		<table><tr><td>Kg a.i pesticides /planted Ha</td><td>0.43</td><td>0.80</td><td>1.28</td></tr></table> <p>While for 2024, Kg a.i pesticides/planted Ha was tabulate as below:</p> <table><tr><td>Jan</td><td>Feb</td><td>Mar</td><td>Apr</td><td>May</td><td>June</td><td>July</td></tr><tr><td>0.92</td><td>0.99</td><td>0.89</td><td>1.10</td><td>1.01</td><td>0.98</td><td>1.21</td></tr></table>	Kg a.i pesticides /planted Ha	0.43	0.80	1.28	Jan	Feb	Mar	Apr	May	June	July	0.92	0.99	0.89	1.10	1.01	0.98	1.21	
Kg a.i pesticides /planted Ha	0.43	0.80	1.28																		
Jan	Feb	Mar	Apr	May	June	July															
0.92	0.99	0.89	1.10	1.01	0.98	1.21															
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>All pesticides used were those officially registered under the Pesticide Act 1974. The selection of products was tailored to address the specific target pest, weed, and disease.</p> <p>Sighted and reviewed chemical register and confirmed that all operating units confined usage to only class II, class III & class IV pesticides.</p> <p>IPM Plan for estate was reviewed. Examples of programmed conducted are increasing number of barn owl nest, addition of plot for beneficial plants and increasing amount of EFB and decanter cake to be applied in estate.</p>	Complied																		
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>No prophylactic use of pesticides can be identified during site visit and confirmation with Chemical Register updated on 01/01/2024</p>	Complied																		
7.2.5	<p>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.</p> <p>The due diligence refers to:</p> <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>Observation at chemical store and documents verification via Chemical Register affirmed that there no Class 1A and Class 1B chemical has been utilized in estate and mill operation activities. Chemical ingredients commonly used are glyphosate, metsulfuron methyl, triclopyr which categorized as Class 2 and Class 3 chemicals. Other examples of chemical used are as listed below:</p> <ul style="list-style-type: none">• Hextar Supremo – Glyphosate Isoprrylamine• Basta – Glufosinate	Complied																		

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	<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>	<ul style="list-style-type: none"> • Garlon Mix – Triclopyr • Starane 33 – Fluroxypr • Monex HC – MSMA and Diuron • Krush – Glyphosate Pottasium • Cyper 16 OEC – Cypermethrin • Asir 5G – Carbosulfan • Antracol 70WP – Propineb • Matikus – Brodifacoum • Ebor - Bromadioline 	
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>Pesticide operators have undergone training concerning the safe and health-conscious usage, as well as the proper application methods of chemicals. Additionally, they regularly participate in monthly health surveillance conducted by the Medical Assistant. List of training conducted for each estate as details below:</p> <ul style="list-style-type: none"> • <u>Genting Sabapalm Estate</u>: Training on Manual Spraying and Mechanical Spraying Work Procedure, dated 16/05/2024 <p>Based on interview session and documents review, training related to pesticide handling listed above were attended by sprayers, chemical mixer, store clerk and upkeep mandores.</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 discovered stored in the Chemical Store on the estate, adhering to the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) along with their corresponding regulations. The storage facilities were consistently secured to avoid unauthorized access, and proper hazard signage was observed and well maintained at both exterior and interior walls. Adequate ventilation facilities and safety data sheets were also provided.</p>	Complied

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		Interview session with personnel in charge confirmed that chemical storage is restricted area for pregnant and breast-feeding mothers.	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	Unused chemical containers not utilized for premixing were subjected to triple rinsing and puncturing. These containers were then classified as scheduled waste and appropriately disposed of through waste collection contractors, as outlined in Indicator 7.3.2	Complied
7.2.9	(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. - Critical (Major) compliance -	Not applicable since there is no aerial spraying has been conducted.	Not Applicable
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	Medical Surveillance has been conducted for individuals exposed to chemical. The medical surveillance has been conducted on 05/06/2024 by certified assessor for 52 workers in total. Sighted result of examination for medical surveillance concluded that all workers examined are fit to work.	Complied
7.2.11	(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. - Critical (Major) compliance -	On-site observation at P99, Block 20 in addition to verification of the employee master list, no evidence was found indicating that individuals under the age of 18, pregnant or breastfeeding women, or those with medical restrictions were involved in work related to pesticides.	Complied
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance -	The waste management plans that includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics are documented in all operating units as per sample Genting Sabapalm Oil Mill (GSOM) Waste Management Plan as following:	Complied

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		<table><tr><th>Source</th><th>Management & monitoring/action plan</th><th>Data/records</th></tr><tr><td>Scheduled waste</td><td>EQ SW 2005 Reg. 2005 handling: - Designated storage max 180 days - Labelling - Disposal via DOE authorized contractor</td><td>- 2nd schedule - 5th schedule - 6th schedule - 7th schedule</td></tr><tr><td>Domestic waste</td><td>Segregation & landfill</td><td>- Collection 3x/weeks - 1-2ft filling trench & sandwich method weekly</td></tr><tr><td>Recyclable waste</td><td>Segregation & recycle – paper, aluminium can & plastic bottles</td><td>- Collection weekly - Storage & sell 6 monthly</td></tr></table> <p>The Waste Management Plan – Genting Sabapalm Estate, for identified type of waste # (1) Scheduled Waste (Including Clinical Waste), Management Plan – Collection/disposal by DOE approved contractor Scheduled Waste: Lagenda Bumimas; Clinical Waste: Sedafiat – to call contractor every 6 month or when waste exceeds 20mt, whichever comes first – however, based on the Waste Management Plan for identified type of waste # (1) Scheduled Waste (Including Clinical Waste), Management Plan – Collection/disposal by DOE approved contractor Scheduled Waste: Lagenda Bumimas; Clinical Waste: Sedafiat – to call contractor every 6 month or when waste exceeds 20mt, whichever comes first.</p>	Source	Management & monitoring/action plan	Data/records	Scheduled waste	EQ SW 2005 Reg. 2005 handling: - Designated storage max 180 days - Labelling - Disposal via DOE authorized contractor	- 2 nd schedule - 5 th schedule - 6 th schedule - 7 th schedule	Domestic waste	Segregation & landfill	- Collection 3x/weeks - 1-2ft filling trench & sandwich method weekly	Recyclable waste	Segregation & recycle – paper, aluminium can & plastic bottles	- Collection weekly - Storage & sell 6 monthly	
Source	Management & monitoring/action plan	Data/records													
Scheduled waste	EQ SW 2005 Reg. 2005 handling: - Designated storage max 180 days - Labelling - Disposal via DOE authorized contractor	- 2 nd schedule - 5 th schedule - 6 th schedule - 7 th schedule													
Domestic waste	Segregation & landfill	- Collection 3x/weeks - 1-2ft filling trench & sandwich method weekly													
Recyclable waste	Segregation & recycle – paper, aluminium can & plastic bottles	- Collection weekly - Storage & sell 6 monthly													
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	Proper disposal of waste material was fully understood by all personnel and demonstrated as per sample records as following: - Fifth Schedule Inventory of Scheduled Wastes File Ref. # JAS.SSK.600-3/1/3; Inventory month: July 2024	Non-compliance												

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		<ul style="list-style-type: none"> - Sixth Schedule Consignment Note for Scheduled Waste; Date received: 14/05/2024; Disposal contractor: Lagenda Bumimas Sdn. Bhd. - Consignment # 2024051411WISGRB; Waste code: SW323 – Spent chemicals; Quantity: 0.12 mt - Consignment # 2024051411EDAZBU; Waste code: SW409 – Contaminated containers; Quantity: 0.027 mt - Consignment # 2024051413LRNP4; Waste code: SW410 – Used Filter; Quantity: 0.091 mt - Consignment # 2024051413LRNP4; Waste code: SW410 – Contaminated rags etc.; Quantity: 0.091 mt <p>Verification was conducted at the clinical waste store of Genting Sabapalm Estate, which is located at the back of the clinic, indicated that clinical waste (SW 404) was stored accordingly. However, there is no labelling observed providing information regards to generated date, name, address, telephone number, type of waste and scheduled waste code.</p> <p>This practice is in violation of the Scheduled Waste Management, Doc. No. SMP-GPB-11, Rev.02, updated September 2020, Clause 8.4- Labelling (Regulation, Third Schedule_ which stating that all scheduled waste containers shall be clearly labelled as well as Environment Quality Regulations (Scheduled Waste) 2005, under the Environmental Quality Act of 1974.</p> <p>Hence, Minor Non-Conformity is raised</p>	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	Based on site verification and interview with internal and external stakeholders, there is no use of fire in wastes disposal observed. Domestic and household wastes were landfilled.	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			

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7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts as per sample Genting Plantations Berhad Oil Palm Manual by Genting Plantation Research Centre; An update as at April 2021 for contents subject as following: <table><tr><td>Code</td><td>Subject</td></tr><tr><td>OPM # 01</td><td>Land Clearing, Preparation Planting and Legume Covers Establishment</td></tr><tr><td>OPM # 02</td><td>Oil Palm Nursery Practices</td></tr><tr><td>OPM # 03</td><td>Planting Density and Planting Techniques</td></tr></table>	Code	Subject	OPM # 01	Land Clearing, Preparation Planting and Legume Covers Establishment	OPM # 02	Oil Palm Nursery Practices	OPM # 03	Planting Density and Planting Techniques	Complied
Code	Subject										
OPM # 01	Land Clearing, Preparation Planting and Legume Covers Establishment										
OPM # 02	Oil Palm Nursery Practices										
OPM # 03	Planting Density and Planting Techniques										
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	Periodic tissue and soil sampling is carried out by Genting Plantations Research Centre (GPRC) Annual Plant Test Report as per latest Soil Test Report # STR 11/2021; Annual Soil Sampling; Date tested: 27/10/20221 – 25/11/2021; Date issued: 06/12/2021.	Complied								
7.4.3	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. - Minor compliance -	A nutrient recycling strategy is in place as per sample EFB application as following: - Mature area: 25mt/ha - Immature area: 16mt/ha	Complied								
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Records of fertilisers input is maintained in Genting Plantations Research Centre - 2023 & 2024 Fertiliser Program for Genting Sabapalm Estate, which have the information about type of fertiliser, quantity (bags and kg), dates of application and field number. Verification of records confirmed that the applied fertilisers were tally with the agronomist recommendation. The application of the fertilizers is recorded in the program upon completion of each field.	Complied								

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Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	Maps identifying marginal and fragile soils, including steep terrain, are available as Genting Sabapalm Estate (GSPE) Soil Map; Projection: Longitude/Latitude; Datum: WGS 84; Data Source: Param Agricultural Soilsurvey (M) Sdn. Bhd.; Prepared by: GPRCS; WEF date: 14/9/2018.	Complied
7.5.2	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. - Minor compliance -	Based on site visit at the replanting areas, there were no observation of planting on steep slopes. Generally, slope areas that are more than 25° are left unplanted and natural vegetation is maintained.	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting in Genting Sabapalm Estate (GSPE).	Complied
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.			
7.6.1	(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. - Critical (Major) compliance -	There's no new planting in Genting Sabapalm Estate (GSPE). Nonetheless, the estates continuously implement practices good agricultural practices as guided in their SOPs (Oil Palm Manual, dated 30/08/2013). They are followed to manage the soil fertility to levels ensuring optimal and sustainable yields. Based on the soil map, it was indicated that the estate consists of 2822.00 ha of Mineral Soil (64.85 %), 1334.30 Ha of Peat Soil (30.62 %) and 204.74 Ha of Acid Sulphate Soil (4.70 %).	Complied
7.6.2	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 -	Not applicable since no new planting in Genting Sabapalm Estate (GSPE).	Not Applicable

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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 -	Not applicable since no new planting in Genting Sabapalm Estate (GSPE).	Not Applicable
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 of last assessment, there is no new planting on peat within the Genting Sabapalm Estate (GSPE).	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 -	Areas of Peat inventoried in the Map of Genting Sabapalm Estate (GSPE), Soil Map, available for verification in the estate. The map was prepared by Genting Plantations Research Centre Sabah (GPRCS) and updated on 22/11/2022 but no changes regard to hectareage of peat. Notwithstanding, GSPE maintained the information as documented in the peat inventory form. Evidence of 2 nd submission of the peat inventory was available and evident as per submission receipt via google form on 08/06/2023. The soil map indicated that the estate consists of 2822.00 ha of Mineral Soil (64.85 %), 1334.30 Ha of Peat Soil (30.62 %) and 204.74 Ha of Acid Sulphate Soil (4.70 %). Genting Plantation Berhad have submitted the Peat Inventory for the organisation to RSPO on 15/11/2019 and RSPO have acknowledged received on 27/11/2019. The records of communication were available for verification.	Complied
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	The subsidence soil monitoring was done annually in Genting Sabapalm Estate (GSPE). Visit to the Soil Subsidence Monitoring Pole in Klagan Division indicated no movement from the previous record for subsidence soil. Piezometer was also installed in the peat field to monitor the water level of the peat areas. Monitoring was done on a weekly basis and records were available for verification. During the visit to the	Complied

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		Piezometer at Klagan Division, the reading was within the required range of 55 cm – 65 cm.	
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The management of the Peat areas are in accordance with the Best Management Practises (BMP) for cultivation of Oil Palm on marginal Soils, by Genting Plantations Research Centre, Sabah. Peat Drainability Report dated 23/03/2021 were prepared by Genting Plantations Research Centre, Sabah for planning drainage and irrigation within peat field.</p> <p>Piezometer was also installed in the peat field to monitor the water level of the peat areas. Monitoring was done on a weekly basis and records were available for verification. During the visit to the Piezometer at Klagan Division, the reading was within the required range of 55 cm – 65 cm.</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>The management of the Peat areas are in accordance with the Best Management Practises (BMP) for cultivation of Oil Palm on Marginal Soils, by Genting Plantations Research Centre, Sabah.</p> <p>Peat Drainability Report dated 23/03/2021 prepared by Genting Plantations Research Centre, Sabah for planning drainage and irrigation at areas with peat. There is evidence that the report prepared is according to RSPO Drainability Assessment Procedure Version 02 dated October 2021 and all requirement in the checklist has been included.</p> <p>Total 1,334.30 Ha out of 3,947.20 Ha is peat area that has been planted with oil palm which is around 30.62% of total land area.</p> <p>There is no replanting has been done at peat area. As per assessment done, it has been confirmed that peat drainability is in place where there is no significant incidence of backflow of water observed. The management has established plan to re construct</p>	Complied

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		suitable carrier drains and additional monitoring. The minimum natural drainability threshold has been met.	
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>The existing planting on peat area are managed according to the RSPO manual on Best Management Practices such as water table management and piezometer motoring.</p> <p>The management of the Peat areas are in accordance with the Best Management Practises (BMP) for cultivation of Oil Palm on marginal Soils, by Genting Plantations Research Centre, Sabah.</p> <p>Peat Drainability Report dated 23/03/2021 were prepared by Genting Plantations Research Centre, Sabah for planning drainage and irrigation at areas with peat.</p>	Complied
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>	Not applicable because no unplanted and set-aside peatlands in the managed area.	Not Applicable
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>Water management plans were in place in both Genting Sabapalm Oil Mill (GSOM) and Genting Sabapalm Estate (GSPE). The plan documented as Genting Sabapalm Oil Mill (GSOM) Water Management Plan for Raw Water & Drinking Water (as per SOM-LAB-12 & SOP-LAB-03); Date: 27/04/2024 has ensured the continued availability of water sources and avoidance of negative impacts on other users in the catchment.</p> <p>Water analysis report carried out on quarterly basis based on established plan and procedure, SMP-GPB-15: Water Sampling and</p>	Complied

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		<p>Analysis Rev. # 2 dated January 2023 to ensure domestic water provide to workers is safe for human consumption and comply with Drinking Water Quality Standard (DWQS) as part of adequate access to clean water provided to workers. The latest quarter of domestic water analysis at (Division 1, 3 & 4) checked and comply with Drinking Water Quality Standard (DWQS). as per sample Water Certificate of Analysis Ref. # W240507/18; Date: 27/05/2024; Parameters tested results:</p> <ul style="list-style-type: none"> - Ammonical Nitrogen: 1.5 ppm - Turbidity: 5 ppm - pH: 6.5 - 9.0 - Total Coliform: ND in 100ml 	
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>Genting Sabapalm Estate (GSPE) maintained their riparian zones well based on the observation during site visits with efforts to maintained and enhanced the area were demonstrable. Among the efforts observed were demarcation of riparian zones, restriction of herbicides or fertilizer application in the zones, enrichment of vegetation and installation of signboards.</p> <p>To ensure natural stream water not affected by the mill and estate activities, regular water quality monitoring conducted as per sample documented as following:</p> <ul style="list-style-type: none"> - Certificate of Analysis # E240730-07-0; Lab Ref. # E240730/07A-07C; Sampling date: 30/07/2024; Report date: 08/08/2024 for sample marking (descriptions) as following: - A: Upstream Labuk River – BOD <2 - B: Downstream Labuk River – BOD <2 - C: POME Final Discharge Facultative Pond # 2 – BOD: 82.4 	Complied

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7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>It has been noted, as stated in the DOE license # 005261 compliance schedule, the POME final discharge via land application BOD limit is 500ppm. Verified latest laboratory analysis result for final discharge effluent conducted by accredited lab as following:</p> <ul style="list-style-type: none"> - Certificate of Analysis # E240730-07-0; Lab Ref. # E240730/07A-07C; Sampling date: 30/07/2024; Report date: 08/08/2024 for sample marking (descriptions) as following: - A: Upstream Labuk River – BOD <2 - B: Downstream Labuk River – BOD <2 - C: POME Final Discharge Facultative Pond # 2 – BOD: 82.4 	Complied
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Mill water use per tonne of FFB is monitored and recorded in the Genting Sabapalm Oil Mill (GSOM) & Domestic Water Monitoring Report as per records of Sabapalm Oil Mill water consumption monitoring as following:</p> <ul style="list-style-type: none"> - 2021: 0.85 m³/mt FFB processed - 2022: 0.67 m³/mt FFB processed - 2023: 0.53 m³/mt FFB processed - To-date July 2024: 0.66 m³/mt FFB processed <p>Water consumptions were divided into mill/process, boiler & domestic.</p>	Complied
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>The plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored, and documented as per records of Genting Sabapalm Oil Mill (GSOM) Monitoring of energy use as following:</p> <p>2023 Diesel Consumption Monitoring Record; Date: 14/01/2024:</p> <ul style="list-style-type: none"> - Total usage: 272,698.00 liters 	Complied

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		<ul style="list-style-type: none"> - Average Diesel Use / FFB (L/MT): 2.61 - Baseline (L/MT): 1.95 – 4.69 <p>2024 (to-date) Diesel Consumption Monitoring Record; Date: 06/08/2024:</p> <ul style="list-style-type: none"> - Total usage: 157,475.00 liters - Average Diesel Use / FFB (L/MT): 4.18 - Baseline (L/MT): 2.61 (2023) 	
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> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>GHG emissions are identified and assessed with plans to reduce or minimize as per sample management plan to improve efficiency of diesel usage as following:</p> <ul style="list-style-type: none"> - Drivers' education training - Mechanization in field implementation 	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> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>No new planting/development in Genting Sabapalm Estate (GSPE). For existing operations, both Genting Sabapalm Estate (GSPE) and Genting Sabapalm Oil Mill (GSOM) has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. The data and calculations in Palm GHG have been verified and approved accordingly.</p>	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Other significant pollutants identified mainly sourced from the boiler stack emissions as per sample monitoring by Genting Sabapalm Oil Mill (GSOM) as following:</p> <p>Stack Emission Monitoring Report for Boiler # 2 Year 2024; Report Ref. # RSSB/STACK/2024-018; Sampling date: 27/02/2024 by RehPro Scientific Sdn. Bhd.</p>	Complied

Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	No new planting within Genting Sabapalm Estate (GSPE). For replanting, fire is not used for preparing land as per method established in the SOP – Plantation Division Title: Fire Prevention and Control Measures; Doc. # SOP-PD-12; Rev. 00; Issue date: Oct 2020. This also include the prevention of fire use in the managed area such as boundary with adjacent stakeholders. These stakeholders were engaged by Genting Sabapalm Estate (GSPE) on fire prevention during latest stakeholder consultation conducted on 20/03/2024.	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 -	Fire Prevention and Control Measures (Doc No.: SOP-PD- 12; Revision: 00; Issue Date: Oct 2020) has been established to provide guidance to the estates on the prevention of fire and its management during the dry season and replanting stage should there is any fire breakout.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	For replanting, fire is not used for preparing land as per method established in the SOP – Plantation Division Title: Fire Prevention and Control Measures; Doc. # SOP-PD-12; Rev. 00; Issue date: Oct 2020. This also include the prevention of fire use in the managed area such as boundary with adjacent stakeholders. These stakeholders were engaged by Genting Sabapalm Estate (GSPE) on fire prevention during latest stakeholder consultation conducted on 20/03/2024.	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.	No land clearing since no new planting/development in Genting Sabapalm Estate (GSPE) since last audit.	Complied

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	<p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>										
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <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).</p> <p>- Critical (Major) compliance -</p>	<p>HCVs, HCS forests and other conservation areas are identified based on the report Inventory on HCV Sites Within Genting Plantations Berhad Group of Estates (Sabah Region 1) by Dr. Yap Son Kheong of SK Yap Forestry and Landscape Advisory Services.</p> <p>Site visit and the report prepared for: Genting Plantations Berhad, 3rd Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur; Author: Dr. Yap Son Kheong, SK Yap Forestry and Landscape Advisory Services, 31 Loring Zaaba, Taan Tun Dr. Ismail, 60000 Kuala Lumpur confirmed that no new land clearing in Genting Sabapalm Estate (GSPE) after 15/11/2018.</p> <p>Based on the report, there were 2 areas classified as HCV which is the Riparian Buffer Belt (Labuk River & Bangkawat River) and Burial grounds which has been identified. The management have established a Management and Monitoring Plan for HCV Areas Within Genting Sabapalm Estate which were reviewed on a yearly basis. The purpose of the Management Plan is to preserve and conserve the HCVs within the estate's management areas as per sample Summary of HCV areas at Genting Sabapalm Estate (GSPE) and example signages; Date: 20/03/2024 as following:</p> <table border="1"> <thead> <tr> <th>Details</th><th>Division/Block</th><th>HCV</th><th>Signage</th></tr> </thead> <tbody> <tr> <td>Riparian Buffer Zones</td><td>Sapi Div. – Block 8, 7B</td><td>HCV 4.2 (Erosion Control)</td><td>- No spraying & manuring - No felling, sickling & slashing</td></tr> </tbody> </table>	Details	Division/Block	HCV	Signage	Riparian Buffer Zones	Sapi Div. – Block 8, 7B	HCV 4.2 (Erosion Control)	- No spraying & manuring - No felling, sickling & slashing	Complied
Details	Division/Block	HCV	Signage								
Riparian Buffer Zones	Sapi Div. – Block 8, 7B	HCV 4.2 (Erosion Control)	- No spraying & manuring - No felling, sickling & slashing								

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					- No fishing & swimming -													
7.12.3	Indicator is not applicable in Malaysia context	Not Applicable				Not Applicable												
7.12.4	<p>(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 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>An HCV management plan established based on the result of the assessment mentioned in Indicator 7.12.2. Verification on-site confirmed that the plan was satisfactorily implemented. Among identified HCV was HCV 4.2. The management plans include regular patrols within to identified areas with findings recorded by the respective estate executives to monitor the conservation and riparian zones areas. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented. Specific plan based on area implemented as following:</p> <table><tr><td></td><td>HCV area</td><td>Management & Monitoring</td></tr><tr><td>1</td><td>Protected areas</td><td>Boundary markers estate/forest reserve Signage on no illegal hunting/collecting & no authorised entry</td></tr><tr><td>2</td><td>RTE</td><td>Patrol the boundary area Inform all stakeholders on HCV assessment and protection Education & awareness for workers Ensure no agrochemicals activities at bordering water bodies</td></tr><tr><td>3</td><td>Sacred sites</td><td>Clear demarcation and proper fencing at identified HCV Inform community concerning utilisation of site</td></tr></table>					HCV area	Management & Monitoring	1	Protected areas	Boundary markers estate/forest reserve Signage on no illegal hunting/collecting & no authorised entry	2	RTE	Patrol the boundary area Inform all stakeholders on HCV assessment and protection Education & awareness for workers Ensure no agrochemicals activities at bordering water bodies	3	Sacred sites	Clear demarcation and proper fencing at identified HCV Inform community concerning utilisation of site	Complied
	HCV area	Management & Monitoring																
1	Protected areas	Boundary markers estate/forest reserve Signage on no illegal hunting/collecting & no authorised entry																
2	RTE	Patrol the boundary area Inform all stakeholders on HCV assessment and protection Education & awareness for workers Ensure no agrochemicals activities at bordering water bodies																
3	Sacred sites	Clear demarcation and proper fencing at identified HCV Inform community concerning utilisation of site																

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				<p>To maintain cleanliness / upkeep of areas</p> <p>Maintain a buffer in order to secure the area from fire and other disturbances</p> <p>To include areas in HCV map</p>	
		4	Ecosystem	<p>Place clear boundary markers between estate and forest reserve.</p> <p>Place signage on no illegal activities</p> <p>Patrol boundary areas within forest reserve regularly</p> <p>Socialise the HCV assessment consisting of identification management and monitoring to all employees</p> <p>Information to stakeholders on the HCV</p>	
7.12.5	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. - Minor compliance -	No local communities have been identified in HCV areas and HCV forest within Genting Sabapalm Oil Mill (GSOM) certification unit. Furthermore, there is no land clearing after November 2005. Thus, this indicator is not applicable.			Not Applicable
7.12.6	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. - Minor compliance -	<p>Based on the HCV assessment report mentioned in Indicator 7.12.1, there was a potential RTE species presence in the plantation area although no sightings reported since last audit. As part of the conservation programs, signage about the restriction to capture RTE and the information about disciplinary measures were planted at many strategic places in the estate to educate the employees.</p> <p>As per document review, it was confirmed that latest HCV Awareness including briefing on RTE existence in estate compound was conducted to workers on 26/04/2024.</p>			Complied

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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>Outcomes of monitoring (HCV monitoring & RTE sighting checklist) are monitored on monthly basis. Reports of monitoring were made available for verification. The monitoring is one of the activities included in the HCV management and monitoring plan of the estate as per Management and Monitoring Plan for HCV areas within Genting Sabapalm Estate (GSPE). Among the main actions are to develop HCV Management Plan to maintain and enhance identified HCV. These monitoring findings have been further fed back into the management plan that leads to frequent awareness briefings and training programs of stakeholders mainly among workers to conserve nature and RTE by not hunting or keeping the RTE as pet.</p>	Complied
7.12.8	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>There was no land clearing since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Genting Sabapalm Oil Mill (GSOM) certification unit. Thus, this indicator is not applicable.</p>	Not Applicable

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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for **Genting Sabapalm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0.1. 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 Sabapalm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct	Extraction	%
CPO	9.29	OER	19.86
PKO	9.29	KER	3.78

Production	t/yr	Land Use	Ha
FFB Process	108,379.99	OP Planted Area	2,612.90
CPO Produced	21,521.33	OP Planted on peat	1,334.30
PKO Produced	4,096.32	Conservation (forested)	8.91
		Conservation (non-forested)	0.00
		Total	3,956.11

Summary of Field Emission and Sink

	Own Crop*		Group		3rd 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	36,340.96	0.43	-	-	-	-	36,340.96	0.43
CO ₂ Emission from fertilizer	1,996.54	0.02	-	-	-	-	1,996.54	0.02
N ₂ O Emission from peat	9,988.25	0.12	-	-	-	-	9,988.25	0.12
N ₂ O Emission from fertilizer	2,081.87	0.02	-	-	-	-	2,081.87	0.02
Fuel Consumption	407.98	-	-	-	-	-	407.98	-
Peat Oxidation	72,852.79	0.87	-	-	-	-	72,852.79	0.87
Sink								
Crop Sequestration	-32,602.51	-0.39	-	-	-	-	-32,602.51	-0.39
Conservation Sequestration	-81.70	-	-	-	-	-	-81.70	-
Total	90,984.17	1.09	-	-	17,382.53	0.21	108,366.70	1.30

**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	128,802.83	1.19
Fuel Consumption	100.46	-
Grid Electricity Utilization	645.35	0.01
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	129,548.64	1.20

Summary of Kernel Crusher Emission and Credit (if applicable)

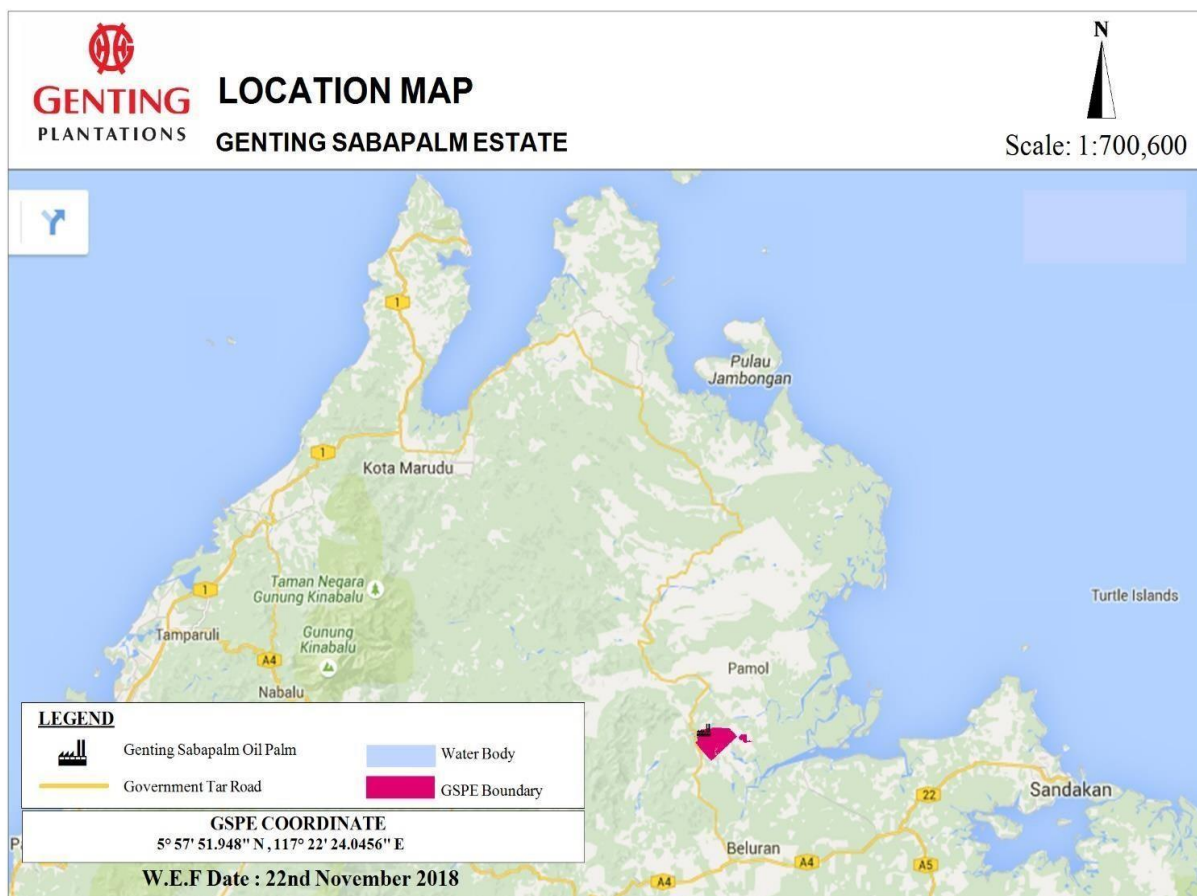
Emissions	tCO ₂ e
PK from own mill	-
PK from other source	-
Fuel Consumptions	-
Total Crusher emissions	-

*This mill has no kernel crusher operation.

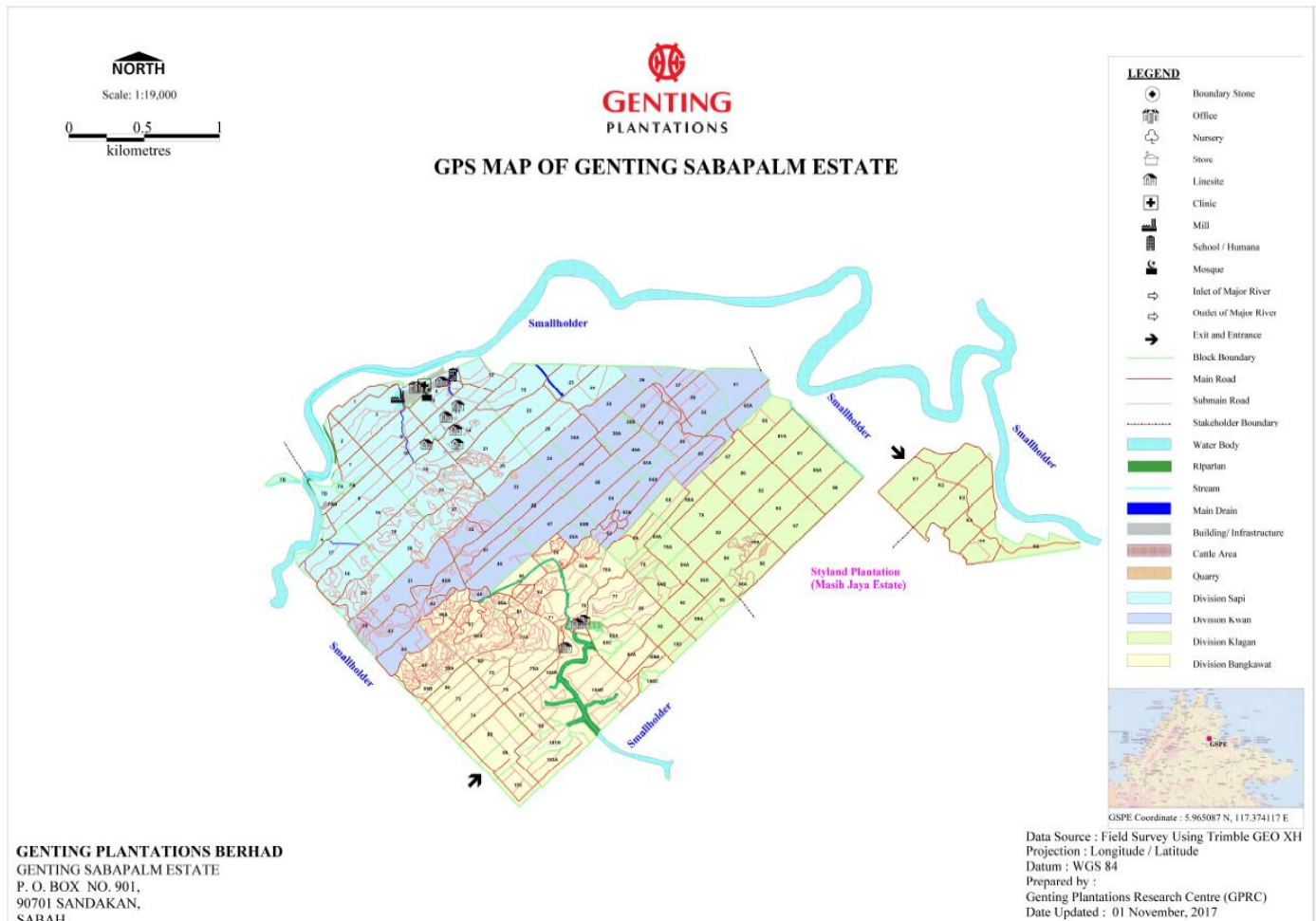
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100.00

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100.00
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



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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