

**MALAYSIAN SUSTAINABLE PALM OIL
MSPO OPMC Public Summary Report**

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

GENTING PLANTATIONS BERHAD
Client Company (HQ) Address: 10 th Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
Certification Unit: Genting Oil Mill Sdn Bhd Genting Ayer Item Oil Mill & Plantations: Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate
Date of Final Report: 29/4/2024

Report prepared by:
Nor Halis Bin Abu Zar (Lead Auditor)

Report Number: 3984724

Assessment Conducted by:
BSI Services Malaysia Sdn Bhd,
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TABLE of CONTENTS	Page No
Section 1: Executive Summary	3
1.1 Organizational Information and Contact Person	3
1.2 Certification Information	3
1.3 Other Certifications	4
1.4 Location of Certification Unit	5
1.5 Certified Area	5
1.6 Plantings & Cycle	6
1.7 Certified Tonnage of FFB	7
1.8 Uncertified Tonnage of FFB.....	7
1.9 Certified Tonnage	7
1.10 Actual Sold Volume (CPO).....	7
1.11 Actual Sold Volume (PK).....	8
Section 2: Assessment Process	9
2.1 BSI Assessment Team	10
2.2 Impartiality and conflict of interest	12
2.3 Accompanying Persons	13
2.4 Assessment Plan	13
Section 3: Assessment Findings	16
3.1 Details of audit results	16
3.2 Details of Nonconformities and Opportunity for improvement.....	16
3.3 Status of Nonconformities Previously Identified and OFI	20
3.4 Summary of the Nonconformities and Status.....	25
3.5 Issues Raised by Stakeholders	25
3.6 List of Stakeholders Contacted	27
Section 4: Assessment Conclusion and Recommendation	28
Appendix A: Summary of the findings by Principles and Criteria.....	29
Appendix B: Smallholder Member Details.....	168
Appendix C: Location and Field Map.....	169
Appendix D: List of Abbreviations	175

Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	Genting Plantations Berhad		
Mill/Estate	Certification Unit	MPOB License No.	Expiry Date
	Genting Ayer Item Oil Mill	500056704000	31/01/2024
	Genting Kulai Besar Estate	508591102000, 508595302000, 540060011000	30/04/2024 30/04/2024 31/05/2024
	Genting Sri Gading Estate	508592902000, 508842111000, 524435102000	30/04/2024 30/06/2024 31/10/2024
	Genting Sungei Rayat Estate	508590202000, 501298102000	30/04/2024 31/03/2024
	Genting Tanah Merah Estate	538065011000, 559916701000, 611773002000, 609122002000, 513814002000, 617898021000	31/03/2024 28/02/2024 31/05/2024 29/02/2024 30/06/2024 31/12/2024
	Genting Tebong Estate	501803202000, 539822011000, 501667602000, 501866102000	30/11/2024 31/05/2024 31/03/2024 31/12/2024
	Address	10 th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia	
Management Representative	Mr. Abdul Rahim Wilson Abdullah (Senior Vice President-Plantations Malaysia)		
Website	www.gentingplantations.com	E-mail	rahim.abdullah@gentingplantations.com
Telephone	03-2333 6401	Facsimile	N/A

1.2 Certification Information			
Certificate Number	Mill: MSPO 682363 Estate: MSPO 696629	Certificate Start Date	29/06/2023
Date of First Certification	29/06/2018	Certificate Expiry Date	28/06/2028
Scope of Certification	<input checked="" type="checkbox"/> Mill: Production of Sustainable Palm Oil and Palm Oil Products <input checked="" type="checkbox"/> Estate: Production of Sustainable Oil Palm Fruits		
Visit Objectives	The objective of the assessment was to conduct an Annual Surveillance Assessment ASA1_1 and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organization's management system and that the		

MSPO Public Summary Report
Revision 2 (Nov 2021)

	system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organization's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.
Standard	<input type="checkbox"/> MSPO MS 2530-2:2013 – General Principles for Independent Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills
Recertification Assessment Visit (RAV) 1	13/02/2023 -17/02/2023
Continuous Assessment Visit Date (CAV) 1_1	05/02/2024 -08/02/2024
Continuous Assessment Visit Date (CAV) 1_2	-
Continuous Assessment Visit Date (CAV) 1_3	-
Continuous Assessment Visit Date (CAV) 1_4	-

1.3 Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE11960213390	International Sustainability and Carbon Certification (EU)	ASG Cert GmbH	31/10/2024
RSPO 653474	RSPO Principles & Criteria for Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019; with Identity Preserved Supply Chain Module	BSI Services Malaysia Sdn Bhd	25/03/2025
MSPO 716638	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018	BSI Services Malaysia Sdn Bhd	23/10/2024
Genting Kulai Besar Estate: MPOB/CoP/NN/0409 -R1	Code of Good Nursery Practice for Oil Palm Nurseries	Malaysian Palm Oil Board (MPOB)	29/11/2026
Genting Seri Gading Estate: MPOB/CoP/NN/0023-R3	Code of Good Nursery Practice for Oil Palm Nurseries	Malaysian Palm Oil Board (MPOB)	18/05/2025
Genting Tanah Merah Estate: MPOB/CoP/NN/0003-R4	Code of Good Nursery Practice for Oil Palm Nurseries	Malaysian Palm Oil Board (MPOB)	29/11/2026
Genting Tebong Estate: MPOB/CoP/NN/0269-1	Code of Good Nursery Practice for Oil Palm Nurseries	Malaysian Palm Oil Board (MPOB)	09/11/2025

MSPO Public Summary Report
Revision 2 (Nov 2021)

1.4 Location of Certification Unit			
Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Genting Ayer Item Oil Mill	Batu 54, Jalan Johor, 86100 Ayer Hitam, Johor, Malaysia	1° 51' 24.15" N	103° 12' 35.96" E
Genting Kulai Besar Estate	No. 1213-1215, Jalan Kasturi 36/45, Indahpura, 81000 Kulai, Johor, Malaysia	1° 36' 55.33" N	103° 36' 39.56" E
Genting Sri Gading Estate	Jalan Bt Pahat - Kluang, KM 12, Sri Gading, 83009 Bt Pahat, Johor, Malaysia	1° 50' 21.10" N	103° 01' 05.20" E
Genting Sungei Rayat Estate	Jalan Sri Gading - Pt Yaani, KM 5, Sri Gading, 83009 Bt Pahat, Johor, Malaysia	1° 54' 14.54" N	103° 00' 38.48" E
Genting Tanah Merah Estate	Jalan Tangkak - Segamat, KM 3, 84907 Tangkak, Johor, Malaysia	2° 16' 53.93" N	102° 33' 37.18" E
Genting Tebong Estate	Jalan Tebong - Batang Melaka, KM 4, 76460 Tebong, Melaka, Malaysia	2° 27' 20.05" N	102° 21' 38.44" E

1.5 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Kulai Besar Estate	2,024.10	10.64	631.71	2,666.45	75.91
Genting Sri Gading Estate	3,219.18	25.82	284.2	3,529.20	91.22
Genting Sungei Rayat Estate	2,300.78	0.18	79.48	2,380.44	96.65
Genting Tanah Merah Estate	2,034.63	45.46	161.96	2,242.05	90.75
Genting Tebong Estate	2,845.51	34.31	136.11	3,015.93	94.35
Total (ha)	12,424.20	116.41	1,293.46	13,834.07	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Notes: Changes in Planted and Total Area Ha

Estate	2023		2024		Reason	Details of HCV	
	Planted	Total Area	Planted	Total Area		HCV	Conservation Area
Genting Kulai Besar Estate	2027.37	2842.05	2,024.10	2,666.45	Planted & Total reduced due to acquisition by Genting Property.	10.64	24.42
Genting Sri Gading Estate	3309.73	3688.34	3,219.18	3,529.20	Planted & Total reduced due to acquisition by Genting Property.	25.82	4.11
Genting Sungei Rayat Estate	2300.78	2378.98	2,300.78	2,380.44	Total area adjusted (increased) 1.46ha to match with land title. Planting ha remain same.	0.18	0.00
Genting Tanah Merah Estate	2044.96	2242.05	2,034.63	2,242.05	Planted reduced 10.33 ha due to conversion to Maize.	45.46	1.14
Genting Tebong Estate	2872.40	3009.73	2,845.51	3,015.93	Planted reduced 26.89 ha due to conversion to Maize. Total area adjusted (increased) 6.20ha due to GPS adjustment.	34.31	10.98
TOTAL	12,555.24	14,161.15	12,424.20	13,834.07	Planted reduced 131.04ha; Total area reduced 327.08ha.	116.41	40.65

- Conservation area has been included in the Infrastructure and Others.

1.6 Plantings & Cycle

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Kulai Besar Estate	585.22	563.24	371.76	261.57	242.31	1,438.88	585.22
Genting Sri Gading Estate	756.17	965.61	832.16	496.27	168.97	2,463.01	756.17
Genting Sungei Rayat Estate	302.73	557.15	797.65	550.71	92.54	1,998.05	302.73
Genting Tanah Merah Estate	547.08	532.34	243.02	605.22	106.97	1,487.55	547.08
Genting Tebong Estate	827.24	741.19	143.10	715.35	418.63	2,018.27	827.24

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Total (ha)	3,018.44	3,359.53	2,387.69	2,629.12	1,029.42	9,405.76	3,018.44
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1.7 Certified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Jun 2023 - May 2024)	Actual (Feb 2023 - Jan 2024)	Forecast (Jun 2024 - May 2025)
Genting Kulai Besar Estate	38,352.00	32,613.66	38,139.00
Genting Sri Gading Estate	61,400.00	52,193.14	59,852.00
Genting Sungei Rayat Estate	54,810.00	41,608.49	48,530.00
Genting Tanah Merah Estate	29,961.00	25,333.83	24,803.00*
Genting Tebong Estate	51,912.00	38,389.34	41,718.00
Total (mt)	236,435.00	190,138.46	213,042.00

Note: * GTME have crop diversion to 3rd party mills (Fermanegh POM – Sg Pelek, Sepang)

1.8 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Jun 2023 - May 2024)	Actual (Feb 2023 - Jan 2024)	Forecast (Jun 2024 - May 2025)
Nil	0	0	0
Total (mt)	0	0	0

1.9 Certified Tonnage

	Estimated (Jun 2023 - May 2024)	Actual (Feb 2023 - Jan 2024)	Forecast (Jun 2024 - May 2025)
	FFB	FFB	FFB
Mill Capacity: 60 MT/hr	236,435.00	190,138.46	213,042.00
	CPO (OER: 20.41%)	CPO (OER: 20.48%)	CPO (OER: 20.56%)
SCC Model: SG	48,256.00	38,948.74	43,808.00
	PK (KER: 5.25%)	PK (KER: 5.16%)	PK (KER: 5.11%)
	12,413.00	9,808.85	10,885.00

1.10 Actual Sold Volume (CPO)

CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		

MSPO Public Summary Report
Revision 2 (Nov 2021)

38,948.74	0	0	38,948.74	0	38,948.74
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1.11 Actual Sold Volume (PK)					
PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
9,808.85	0	0	9,808.85	0	9,808.85

Section 2: Assessment Process

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

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 05-08/02/2024. The audit programme is included as Section 2.4. The approach to the audit was to treat the Genting Ayer Item Palm Oil Mill and Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate, Genting Tebong Estate as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 and MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The Certification Unit were not using MSPO certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSPO Logo and related claims.

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

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

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

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

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

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

MSP0 Public Summary Report
Revision 2 (Nov 2021)

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

Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Re- Certification)	Year 2 (ASA1_1)	Year 3 (ASA1_2)	Year 4 (ASA1_3)	Year 5 (ASA1_4)
Genting Ayer Item Oil Mill	√	√	√	√	√
Genting Kulai Besar Estate	-	√	-	√	√
Genting Sri Gading Estate	√	-	√	-	√
Genting Sungei Rayat Estate	√	-	√	√	-
Genting Tanah Merah Estate	√	√	-	√	-
Genting Tebong Estate	-	√	√	-	√

Tentative Date of Next Visit: February 3, 2025 - February 6, 2025

Total No. of Mandays: 15 Mandays

2.1 BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Nor Halis Abu Zar (NHA)	Team Leader	<p>Education: Bachelor of Science, Plantation Technology and Management, graduated from UiTM in 2012 and Diploma in Plantation and Industry Management from UiTM in 2009.</p> <p>Work Experience: He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day-to-day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for MS 2530:2013 and RSPO Auditor for ENV and OSH and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p>Training attended: He has completed RSPO P&C Lead Auditor Course in Oct 2020, Refresher RSPO P&C Lead Auditor Course in May 2022, RSPO ISH Standard 2019 in December 2021, RSPO SCC 2020 in September 2022, QMS 9001:2015 Lead Auditor Course in April 2019, OSH 45001:2018 Lead Auditor Course in June 2021, IMS (ISO 9001:2015 & ISO 14001:2015) Lead Auditor Course, HCV & HCS Training in August 2022, MSP0 2530:2013 Lead Auditor Course in</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

		<p>February 2019, , MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training on May 2021.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety</p> <p><input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input type="checkbox"/> Environmental</p> <p>Language proficiency:</p> <p>Fluent in both verbal/written Bahasa Malaysia and English Language.</p>
<p>Zulkifli Kamarol Zaman (ZKZ)</p>	<p>Team Member</p>	<p>Education:</p> <p>Bachelor of Science (Agribusiness) from University Putra Malaysia in 2008.</p> <p>Work Experience:</p> <p>He has 10 years' experience in oil palm industry whereas he has been working at plantation company as Estate Assistant Manager prior to joining Certification Body as an Auditor. He is familiar with the estate's daily operation as well as the Best Management Practices for oil palm cultivation. Prior to joining BSI, he was the auditor for several certification bodies. He is involved in auditing MSPO OPMC, MSPO SCCS, RSPO P&C, RSPO SCCS and PEFC CoC standard.</p> <p>Training attended:</p> <p>He has completed ISO IMS 9001, 14001, 45001 Lead Auditor Course in April 2018, Endorsed MSPO OPMC Lead Auditor Course in April 2019, Endorsed MSPO SCCS Auditor Course in September 2019, Endorsed RSPO P&C Lead Auditor Course in March 2020, Endorsed RSPO SCCS Lead Auditor Course in March 2020, PEFC Chain of Custody Training in December 2020, ISO 9001:2015 Lead Auditor Course in October 2023, ISO 45001:2018 Lead Auditor Course in November 2023 and SA8000 Introduction & Basic Auditor Training Course in November 2023.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety</p> <p><input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input type="checkbox"/> Environmental</p> <p>Language proficiency:</p> <p>Fluent in both verbal/written Bahasa Malaysia and English Language.</p>
<p>Mohd Isa Hasim (MIH)</p>	<p>Team Member</p>	<p>Education:</p> <p>He holds the Diploma in Mechanical Engineering, UiTM Pulau Pinang and Diploma in Palm Oil Milling Technology, MPOB Bangi.</p> <p>Work Experience:</p> <p>He started his career with Assistant Engineer at Sime Darby Plantation and working experience almost at 8 years in Palm Oil Mill. After that he join in petrochemical plant for 3 years working experience as Steam Engineer before he joins as Freelance Auditor MSPO with various of certificate body about 6 years' experience.</p> <p>Training attended:</p> <p>He has completed ISO 9001:2015 Lead Auditor Course, MSPO OPMC Lead Auditor Course, MSPO SCCS Lead Auditor Course, IMS Lead Auditor Course, RSPO P&C Lead Auditor Course, RSPO SCCS Lead Auditor Course and</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

		<p>SA8000. He also has a competency license of CEPSWAM Schedule Waste Management, Safety & Health Officer (SHO) DOSH Green Book, Construction Safety & Health Officer (CSHO) CIDB, Steam Engineer Grade 1, DOSH Putrajaya.</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety</p> <p><input type="checkbox"/> Supply chain requirements <input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental</p> <p>Language proficiency:</p> <p>Fluent in both verbal/written Bahasa Malaysia and English Language.</p>
<p>Azman Samion (AZS)</p>	<p>Team Member</p>	<p>Education:</p> <p>Possesses Muster in Business & Administration (MBA) from University Utara Malaysia (2007). Graduated with a Bachelor Since in Agribusiness from the University Pertanian Malaysia (1988).</p> <p>Work Experience:</p> <p>He has 30 years of working experience in the plantation industry at the managerial level in Malaysia and abroad. Has substantial planting experience in oil palm, rubber, and cocoa with the last post possessed as a Plantation Controller of the company. Embarked in MSPO audit since year 2018 with accumulative manday audit as at to date is 510 manday under capacity as a Lead Auditor and Co-Auditor. Has met the qualification requirements as an ABMS Auditor and is currently undergoing Auditor In-training program to complete the required number of manday.</p> <p>Training attended:</p> <p>Has obtained the competency in various field as follow:</p> <ol style="list-style-type: none"> 1. MSPO Lead Auditor Course MSPO MS 2530-2013 (2021). 2. ISO Integrated Management System of ISO 9001:2015 and ISO 14001:2015 (2018). 3. ISO 9001:2015 Quality Management System Lead Auditor course (2019). 4. MSPO SCCS Auditor (2020). 5. Lead Auditor ISO 37001:2016 Anti-Bribery Management Systems (2020). 6. Legal Requirements complementing To MS ISO 37001:2016 Anti-Bribery Management System (ABMS) (2022). <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety</p> <p><input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental</p> <p>Language proficiency:</p> <p>Fluent in both verbal/written Bahasa Malaysia and English Language.</p>

2.2 Impartiality and conflict of interest

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

MSP0 Public Summary Report
Revision 2 (Nov 2021)

2.3 Accompanying Persons

No.	Name	Role
1	Valence Shem	Qualifying Review

2.4 Assessment Plan

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

Date	Time	Subjects	NHA	MIH	AZS	ZKZ
Sunday, 04/02/2024	-	Travelling from Kuala Lumpur to Corsica Hotel Kulai	√	√	√	√
Monday, 05/02/2024 Genting Kulai Besar Estate (GKBE)	08:30 - 09:00	Opening Meeting <ul style="list-style-type: none"> • Presentation by BSI Lead Auditor - introduction of team member and assessment agenda • Confirmation of assessment scope and finalizing audit scope 	√	√	√	√
	09:00 - 12:30	Estate assessment: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√	√
	12:30 - 13:30	Lunch break	√	√	√	√
	13:30 - 16:30	Document Review (MS 2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting	√	√	√	√
	16:30 - 17:00	Interim closing meeting	√	√	√	√

MSPO Public Summary Report
Revision 2 (Nov 2021)

Date	Time	Subjects	NHA	MIH	AZS	ZKZ
Tuesday, 06/02/2024 Genting Ayer Item Oil Mill (GAIOM)	09:00 - 12:30	Mill Assessment: Plant visit, FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√	-
	12:30 - 13:30	Lunch break	√	√	√	-
	13:30 - 16:30	Document review (MS 2530:2013 Part 4): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices.	√	√	√	-
	16:30 - 17:00	Interim closing meeting	√	√	√	-
	17.00	Travel to Tampin, Overnight at Caspari Hotel	√	√	√	-
Wednesday, 07/02/2024 Genting Tebong Estate (GTBE)	09:00 - 12:30	Estate assessment: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√	√
	12:30 - 13:30	Lunch break	√	√	√	√
	13:30 - 16:30	Document Review (MS 2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting	√	√	√	√
	16:30 - 17:00	Interim closing meeting	√	√	√	√
	0700	Travel to Tangkak	√	√	√	√

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Date	Time	Subjects	NHA	MIH	AZS	ZKZ
Thursday, 08/02/2024 Genting Tanah Merah Estate (GTME)	09:00 - 12:30	Estate assessment: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√	√
	12:30 - 13:30	Lunch break	√	√	√	√
	13:30 - 16:30	Document Review (MS 2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting	√	√	√	√
	16:30 - 17:00	Audit Team Discussion and Closing Meeting	√	√	√	√
	1700	Audit Team Travel back to Kuala Lumpur	√	√	√	√

Section 3: Assessment Findings

3.1 Details of audit results

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

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

3.2 Details of Nonconformities and Opportunity for improvement

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

During the assessment there were three (3) Major & one (1) Minor nonconformities and no (0) OFI raised. The Genting Plantations Berhad, Genting Ayer Item POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-Conformity Report			
NCR Ref #:	2454073-202402-M1	Issue Date:	08/02/2024
Due Date:	07/05/2024	Date of Closure:	31/03/2024
Area/Process:	Genting Ayer Item Oil Mill	Clause & Category: (Major / Minor)	MSPO 2530 Part 4-4.4.4.2 (d)(e) Major
Requirements:	d) The occupational safety and health plan should cover the following: The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.		
Statement of Nonconformity:	Workers was not wearing fully PPE and Chemicals stored in the container without label.		
Objective Evidence:	During site visit at Boiler and Crude Oil Tank area, it was found that operators was not wearing earplug as their PPE at each station respectively. It was not in line with NRA Assessment Baseline Section H Recommendation PHP: Recommended PHP with NRR range 25-20, Upgrade awareness and administer its usage onsite.		

MSPO Public Summary Report
Revision 2 (Nov 2021)

	<p>During site visit at Ramp area, it was found that chemicals soda was placed in the container without any labelled.</p> <p>During site visit at Temporary Laboratory area, it was found that detergent was stored in container without any labelled.</p> <p>It was not in line with CHRA Recommendation Section 6.2.7 Relabeling OSHA 1994 USECHH Regulations 200 VI sub- Regulation 21.</p>
Corrections:	<ol style="list-style-type: none"> 1. Ensure the workers wear their earplug at Boiler & Crude Oil Tank area. 2. Issued warning letter to the respective employees on failure to wear the PPE issued. 3. To clear up the contaminated containers and unauthorized repackaging chemical containers, and sent to the Scheduled Waste store.
Root cause analysis:	Lack of enforcement on PPE usage and inadequate awareness on unauthorized containers storing chemicals.
Corrective Actions:	<ol style="list-style-type: none"> 1. To conduct PPE inspection/monitoring. 2. Utilization of warning coupon as reminder. 3. To provide awareness training to all employees on PPE, Scheduled Waste and chemical container relabeling. 4. Conduct Training Evaluation upon the training.
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. PPE inspection has been conducted. Refer Personal PPE Record Card inspection dated 14/03/2024. Inspection has been conducted at Boiler Station, Grader Station and Crude Oil Tank Station to the respective workers. 2. Warning Coupon has been issue as reminder to respective workers. Refer "Laporan Salah Laku / Disiplin" dated 06/02/2024. 3. Training with training evaluation has been conducted on 02/04/2024. 4. Contaminated chemical container has been place in the SW store and Inventory sighted on 29/02/2024 with reference number JAS.KL.600-3/1/11. <p>The implementation of corrective action was conducted accordingly thus Major NC was closed on 31/03/2024.</p>

Non-Conformity Report			
NCR Ref #:	2454073-202402-M2	Issue Date:	08/02/2024
Due Date:	07/05/2024	Date of Closure:	31/03/2024
Area/Process:	Genting Ayer Item Oil Mill	Clause & Category: (Major / Minor)	MSPO 2530 Part 4- 4.5.3.2 Major
Requirements:	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <ol style="list-style-type: none"> a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. 		
Statement of Nonconformity:	Waste management plan was not effectively implemented.		

MSPO Public Summary Report
Revision 2 (Nov 2021)

Objective Evidence:	During site visit at mill compound area, it was noticed use of empty lubricant containers for domestic purpose. It was not in line with management plan stated Prevent miss used / miss placed of schedule waste items at surrounding mill compound, Monitoring Plan: Workplace inspection safety and daily monitoring. Refer Monthly workplace Inspection dated 28/12/2023.
Corrections:	To clear up the contaminated containers and sent to Scheduled Waste store.
Root cause analysis:	Lack of enforcement; Lack of follow up on issues raised/identified during Workplace Inspection.
Corrective Actions:	<ol style="list-style-type: none"> To provide awareness training to all employees (including contractors) on Scheduled Waste Management; Train OSH committee on importance of follow up on pending issues. Conduct Training Evaluation upon the training.
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> Training with training evaluation has been conducted on 02/04/2024. Contaminated chemical container has been placed in the SW store and Inventory sighted on 29/02/2024 with reference number JAS.KL.600-3/1/11. <p>The implementation of corrective action was conducted accordingly thus Major NC was closed on 31/03/2024.</p>

Non-Conformity Report			
NCR Ref #:	2454073-202402-M3	Issue Date:	08/02/2024
Due Date:	07/05/2024	Date of Closure:	31/03/2024
Area/Process:	Genting Kulai Besar Estate & Genting Tebong Estate Home & Batang Melaka Division	Clause & Category: (Major / Minor)	MSPO 2530 Part 3-4.5.1.3 Major
Requirements:	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones shall be developed, effectively implemented, and monitored.		
Statement of Nonconformity:	An environmental improvement plan to mitigate the negative impacts was not effectively implemented and monitored.		
Objective Evidence:	Environment Improvement & Management Plan and Biodiversity Action Plan; Revision, Dated 31/05/2023 on Soil Pollution (Oil spillage & Leaking) –Monitoring & Action Plan requires the management to identify leaking vehicle and shall carry out repair soonest possible. Provide a tray underneath until the repairs are done. The site visit to the tractor garage in Genting Kulai Besar Estate & Genting Tebong Estate Home & Batang Melaka Division found the indication that the oil engine leaked onto the ground from the mini tractor Yammar 100 and New Holland TN75.		
Corrections:	<ol style="list-style-type: none"> Polluted soil disposed at Scheduled Waste store. Spillage tray placed under the leaking tractors. 		
Root cause analysis:	<p><u>GKBE:</u> Lack of enforcement and supervision by the PIC; Inadequate awareness by the Drivers/workers.</p>		

MSPO Public Summary Report
Revision 2 (Nov 2021)

	<p><u>GTBE:</u> Lack of awareness of the new trainee workshop attendant regarding use of spillage container.</p>
Corrective Actions:	<p>Training on Monitoring (Vehicle checklist) & Action plan (Tray placement for all vehicles) & Awareness (effects of pollution) to PIC & All Drivers. Conduct Training Evaluation upon the training.</p>
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. Training on workshop and schedule waste has been conducted at GTBE dated 23/02/2024 with training evaluation. SW inventory for SW408 has been recorded as per latest record dated 27/03/2024. 2. Training on tractor maintenance and oil trap training has been conducted at GKBE dated 16/02/2024 with training evaluation. SW inventory for contaminated soil has been recorded as per latest record dated 16/03/2024. 3. Sighted training materials, attendance and photos for verification. <p>The implementation of corrective action was conducted accordingly thus Major NC was closed on 31/03/2024.</p>

Non-Conformity Report			
NCR Ref #:	2454073-202402-N1	Issue Date:	08/02/2024
Due Date:	Next Assessment	Date of Closure:	Open
Area/Process:	Genting Tebong Estate & Genting Tanah Merah Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3-4.6.1.1 Minor
Requirements:	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.		
Statement of Nonconformity:	Standard operating procedures are not consistently implemented and monitored.		
Objective Evidence:	<p>Verification during site visit at Genting Tebong Estate found that welding rod is kept in the workshop store. However, there is no safety data sheet for welding rod at workshop store which is against section 5.9 Pematuhan Helaian Data Keselamatan (SDS – Safety Data Sheet) under Safe Operating Procedure (Doc. No.: OM-GPB-15; Revision No.: 00; Issue date: 28/07/2022) whereby stated that Helaian Data Keselamatan (SDS) hendaklah disimpan ditempat mudah dilihat dimana bahan kimia berbahaya itu diguna dan hendaklah mudah diperolehi oleh pekerja. While for Genting Tanah Merah Estate, safety data sheet (SDS) is made available in the chemical, fertiliser, and workshop store. However, it was found that SDS for Basta SL 150 and Stainarc 310-16 (welding rod) is only available in English version at the chemical and workshop store. This is not followed section 5.3 under Safe Operating Procedure (Doc. No.: OM-GPB-15; Revision No.: 00; Issue date: 28/07/2022) where stated that Helaian Data Keselamatan (SDS) hendaklah ditulis dalam bahasa kebangsaan dan bahasa English.</p>		
Corrections:	To display the SDS in dual-language at workshop and stores; and ensure they're easily visible.		
Root cause analysis:	The SDS are available, but was not printed and displayed/ misplaced during the audit for verification;		

MSPO Public Summary Report
Revision 2 (Nov 2021)

	Inadequate monitoring/follow up by the Store Keeper.
Corrective Actions:	To retrain the workshop attendant and store clerk on the compliance on SDS, follow up etc. Conduct Training Evaluation upon the training.
Assessment Conclusion:	The CAP is accepted, further verification will be conducted in the next audit.

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

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

3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
NCR Ref #:	2307753-202302-M1	Issue Date:	17/02/2023
Due Date:	16/05/2023	Date of Closure:	17/04/2023
Area/Process:	Genting Sri Gading Estate, Genting Tanah Merah Estate, Genting Sg Rayat Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.4.2 b, c Major
Requirements:	The occupational safety and health plan shall cover the following: b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices; and ii. all precautions attached to products shall be properly observed and applied.		
Statement of Nonconformity:	Found occupational safety and health plan inadequately implemented.		
Objective Evidence:	In GTME, found 1 worker was not wearing earplug during driving the tractor, as per verification the driver (shanker) was one of 3 person who is affected with hearing loss as per audiometric test report dated 8/3/2022. The management already conducted the hearing conservation training on 8/3/2022, however 3 persons included the affected (shanker) was not attend the training. This was not followed as per NRA dated 15/5/2021. In GSGE, the management already send the workers for audiometric test at Poliklinik Intan (RZ Intan Medicare Sdn Bhd) with total workers 26 peoples.		

MSPO Public Summary Report
Revision 2 (Nov 2021)

	<p>However, found workers under workshop and small tractor was not sent for audiometric test not followed as per Noise Risk Assessment (NRA) dated 8/6/2021 (Reg. Report: JH/05/04/116) by Allied Chemists.</p> <p>Found in all estate, The JKPP 7 record was not included in the JKPP 8 during submission. The JKPP 8 that been review was:</p> <p>GTME: JKPP8/132849/2022 GSGE: JKPP8/127650/2023 GSRE: JKPP8/127415/2022</p> <p>Record JKPP 7 review: GTME: 03/06/2022 & 08/03/2022 GSGE: 03/02/2022 GSRE: 10/02/2022</p>
<p>Corrections:</p>	<p>(i) Immediately conduct the training to all workers to attend the Hearing Conservation Training.</p> <p>(ii) To send the workshop attendants and all the drivers to attend the baseline and annual audiometric test according to the NRA assessment.</p> <p>(iii) To notify/update/re-submit to DOSH on the correct figure by including JKPP 7 into JKPP 8 declarations.</p>
<p>Root cause analysis:</p>	<p>(i) (GTME) On the day of the training, the workers were absent for work despite reminders one day before the training.</p> <p>(ii) (GSGE) Internal assessment does not show noise level above 85db and the above workers (workshop workers & small tractor drivers) not exposed continuously to 8 hours of work. In view of this, we delayed the audiometric test and re-scheduled them for the test in 2023.</p> <p>This is the first time we are doing noise regulation and we don't have enough knowledge on the noise regulation.</p> <p>(iii) (GTME, GSGE, GSRE)</p> <ul style="list-style-type: none"> - Lack of knowledge by the person in-charge (PIC) - The PIC didn't include JKPP 7 into the JKPP 8 due to first time doing the compilation coupled with new requirement of NRA implementation.
<p>Corrective Actions:</p>	<p>(i) To ensure all participants must attend the training by checking the workers name list based on their job before starting the training; if any workers unable to attend due to absent/ sick leave etc, to conduct re-training as soon as possible.</p> <p>(ii) To train and brief management team on this audiometric test requirement that all workers as per the Noise Risk Assessment (NRA) shall be sent for the audiometric test, and to consult the Safety and Health Officer (SHO) accordingly if any doubt/ change in decision making.</p> <p>(iii) Training and briefing (including refresher training) to the PIC on requirements of data submission/ declaration to DOSH.</p> <p>Submit JKPP 6, 7 and 8 to Safety and Health Officer (SHO) for his review and endorsement before submitting to DOSH.</p>
<p>Assessment Conclusion:</p>	<p>Based on the evidence provided, it is verified that training on 'Noise Risk at Workplace' to all workers (including the above mentioned 3 workers) has been conducted.</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

	<p>List of workers to be send for the audiometric test is available. Training records (training to the management team) is available. Verified on JKPP 8 resubmission: GTME (submission dated 18/02/23 to DOSH, and JKPP 8 - before and after resubmission) GSGE (submission dated 16/02/23 to DOSH) GSRE (Emailed dated 10/02/23, to DOSH Putrajaya to amend the JKPP 8 data which to include JKPP 7 also in the reports. The evidence found adequate to close the Major NC. Thus, the Major NC is effectively closed on 17/04/2023. Further verification will be conducted in the next surveillance audit.</p>
<p>Verification Statement</p>	<p>Based on the objective evidence reviews during this assessment, the auditor was in satisfactorily to accept implementation of action taken to address this NC. Among others verification conducted in regard to close this NC are:</p> <ul style="list-style-type: none"> • Training for all personnel exposed to noise was conducted at each operating unit. The training focus on importance of worn personal hearing protector Relevant training record such as attendance list, photos and training material were maintained by each estate. The training conducted are as follows: <ul style="list-style-type: none"> - Genting Kulai Besar Estate (GKBE): Training that was conducted on 09/02/2023. - Genting Tebong Estate (GTBE): Training that was conducted on 15/02/2023. - Genting Tanah Merah Estate (GTME): Training that was conducted on 21/07/2023. <p>Furthermore, interview conducted with the person works at high noise area such as driver tractor, harvester (using motorized cutter) and foreman, confirmed that they have attended the training and undergone audiometric test. The result of audiometric test has also informed to them.</p> <ul style="list-style-type: none"> • Training to the management team at each estate on the audiometric test requirement as per Noise Risk Assessment (NRA) report were conducted on 18/04/2023. Interview with person in charge responsible to the audiometric test and Safety and Health Officer found that they have mechanism to ensure that none of workers involved are not sent to the audiometric test. Management team will list the workers name involved and verify them with the Safety and Health Officer. Checking with the audiometric test and list of workers which is expose to the noise as per Noise Risk Assessment (NRA), it was found that all personnel involved sent to the annual audiometric test programme that was conducted as follows: <ul style="list-style-type: none"> - Genting Kulai Besar Estate on 30/12/2023 and 17/01/2024 - Genting Tebong Estate on 13/12/2023 - Genting Tanah Merah Estate on 21/03/2023 <p>In addition, interview with sampled workers during site visit confirmed their attendance for audiometric test conducted.</p> <ul style="list-style-type: none"> • Refresher training (in house OSH training) was conducted on 18/04/2023 by Safety & Health Officer from HQ for the person in charge responsible for data submission to the DOSH, in particular JKPP 6, JKPP 7 and JKPP 8 form. An interview with person in charge, indicates that they are understood on requirement to include all accident cases in JKPP 8 form for that particular year.

MSPO Public Summary Report
Revision 2 (Nov 2021)

	<p>Mechanism to monitor accident reporting is in place. All DOSH report including JKPP 6, JKPP 7 and JKPP 8 form will be submitted to the Safety and Health Officer before final submission to DOSH. Verification made in the JKPP 8 form, found that accident cases reported were tallied with the JKPP 6 and JKPP 7 form.</p> <p>With the above verification, it was found that no reoccurrence issue has been observed. Hence, this Major NC is remained closed.</p>
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Non-Conformity Report			
NCR Ref #:	2307753-202302-M2	Issue Date:	17/02/2023
Due Date:	16/05/2023	Date of Closure:	17/04/2023
Area/Process:	Genting Sg Rayat Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.5.3.3 Major
Requirements:	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.		
Statement of Nonconformity:	The SOP in relation to the Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations(Scheduled Waste) 2005 was not effectively implemented.		
Objective Evidence:	Sg Rayat Estate 16/02/2023 - Visit to the workshop area discovered presence of empty lubricants containers and used rags being disposed into a dustbin and not stored at the designated containers.		
Corrections:	(i) The empty lubricant containers and rags were removed from the dustbin and disposed at scheduled waste store. (ii) Training and briefing to the welder on the Scheduled Waste Management including its categories, disposal, inventory update etc.		
Root cause analysis:	Inadequate training to the newly appointed workshop welder, and poor supervision by the workshop foreman.		
Corrective Actions:	Training and regular inspection (on daily basis) by the workshop foreman upon engaging any new workers at workshop until the new workers complies fully with the scheduled waste requirements.		
Assessment Conclusion:	Based on evidence verification on training done on 23/02/2023, evaluation and inspection record. The evidence found adequate to close the Major NC. Thus, the Major NC is effectively closed on 17/04/2023. Further verification will be conducted in the next surveillance audit.		
Verification Statement	<p>The site visit to the scheduled waste store at Genting Kulai Besar Estate, Genting Tebong Estate & Genting Tanah Merah Estate, observation of domestic waste disposal via contractor in Genting Kulai Besar Estate, and during the site visit to the landfill in Block 2000A Home Division Genting Tebong Estate & the landfill in Block 96 Genting Tanah Merah Estate confirmed that there is no reoccurrence of the issues concerning scheduled waste management that was highlighted in the Major Non-conformance during last year's audit.</p> <p>With the above verification, it was found that no reoccurrence issue has been observed. Hence, this Major NC is remained closed.</p>		

MSPO Public Summary Report
Revision 2 (Nov 2021)

Non-Conformity Report			
NCR Ref #:	2307753-202302-N1	Issue Date:	17/02/2023
Due Date:	08/02/2024	Date of Closure:	08/02/2024
Area/Process:	Genting Sg Rayat Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.3.1.4 Minor
Requirements:	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.		
Statement of Nonconformity:	The monitoring of machinery CF renewal is not effective.		
Objective Evidence:	There were 2 units of air compressor (PMT 14835 and PMT 15784) in Genting Sg Rayat Estate having an expired CF dated 10/11/2022. Renewal bDOSH was made dated 16/11/2022.		
Corrections:	Training and briefing to the PIC to renew permits before the expiry dates and follow up accordingly, and training on Sustainability Management Procedure (SMP-GPB-22; FMA Act1967; Act 139; Section 19; Certificate of Fitness). To follow up with DOSH on the submission for renewal of the 2 units air compressor done in 16/11/22.		
Root cause analysis:	Inadequate training to the person-in-charge on the monitoring of the permits.		
Corrective Actions:	Latest appointment letter issued (to Pn. Siti and Pn. Amira) as person in-charge to monitor the legal requirements.		
Assessment Conclusion:	CAP has been reviewed and satisfied. Effectiveness of the implementation will be review during the next ASA.		
Verification Statement	Sighted appointment letter to Chief Clerk by Manager for person in charge and responsible to monitor compliance of Law and Regulation. Based on interview conducted with the personnel at sample site, they have good awareness on their task. Monitoring on expiry license was done on monthly basis to ensure there is no lapse on renewal the license. Any update will be from HQ and person in charge was aware on that. The implementation of the corrective action found satisfactory; thus Minor NC was effectively closed on 08/02/2024.		

Opportunity For Improvement			
Ref:	N/A	Clause:	MSPO Part __: N/A
Area/Process:	N/A		
Objective Evidence:	N/A		
Verification Statement:	N/A		

3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
2307753-202302-M1	4.4.4.2 Part 3 Major	17/02/2023	Closed On 17/04/2023
2307753-202302-M2	4.5.3.3 Part 3 Major	17/02/2023	Closed On 17/04/2023
2307753-202302-N1	4.3.1.4 Part 3 Minor	17/02/2023	Closed on 08/02/2024
2454073-202402-M1	4.4.4.2 Part 4 (d)(e)	08/02/2024	Closed on 31/03/2024
2454073-202402-M2	4.5.3.2 Part 4	08/02/2024	Closed on 31/03/2024
2454073-202402-M3	4.5.1.3 Part 3	08/02/2024	Closed on 31/03/2024
2454073-202402-N1	4.6.1.1 Part 3	08/02/2024	Open

3.5 Issues Raised by Stakeholders

IS #	Description
1	<p>Issues: Workers Representative</p> <p>They informed that the management treated everyone equally without discrimination. Their wages are paid accordance to Employment Act 1955 and latest Minimum Wage Order. They have the rights to join any association. The latest workers committee meeting has conducted on 21/12/2023. The workers where can discuss with the management on any work related and social issue with the management freely. The workers were aware on the complaints and grievances channel such mycareline through online system.</p>
	<p>Management Responses:</p> <p>Noted on the positive comment. The management will ensure the compliance of regulations and respect the rights of workers.</p>
	<p>Audit Team Findings:</p> <p>Reviewed the payslips for all sampled workers found all the workers were paid as per the legal requirements. No further issues.</p>
2	<p>Issues: Gender Committee Representative</p> <p>Based on the interview, there is evidence that all female workers can participate in gender committee meeting. The latest gender committee meeting has conducted 22/08/2023. As per interview, it has been confirmed that grievance procedure for any harassment has been communicated and all representatives can demonstrate their understanding on the procedure. Other than that, it has been confirmed there is no discrimination in site operation. All female workers received same benefits same as other workers. The workers were aware on the complaints and grievances channel such mycareline through online system.</p>
	<p>Management Responses:</p> <p>Noted on the positive comment. The management will ensure the compliance of regulations and respect the rights of workers.</p>
	<p>Audit Team Findings:</p> <p>Reviewed the payslips, employment contracts and records of meeting minutes of Gender Committee confirmed that no discrimination and sexual harassment reported.</p>

<p>3</p>	<p>Issues: Head of Village Head of village for Kampung Batang Melaka and kampung Payamas has been interviewed. Some of residence are working in the office estate. Based on the on the interview, it has been confirmed that good relationships have been between both parties. They also mentioned that there are no operation or activities in estate that give adverse effect to the local communities. There are no cases of pollution has happened and identified by the villagers.</p> <p>Management Responses: Noted on the positive comment.</p> <p>Audit Team Findings: Sighted that communication of any vacancy has been informed done during the stakeholders meeting.</p>
<p>4</p>	<p>Issues: FFB Transporter The FFB Transporter had given positive feedback about the training provided by management. He mentioned that the training covered important aspects such as policy, safety, environment, and social considerations related to the certification of RSPO and MSPO. He also demonstrated a good understanding of the minimum wage requirements and safety protocols. This indicates a positive outcome from the training session.</p> <p>Management Responses: Noted on the positive comment.</p> <p>Audit Team Findings: Sighted the evidence of contract agreement with transporter including training record.</p>
<p>5</p>	<p>Issues: JCB Contractor The contractor had given positive feedback about the training provided by management. He mentioned that the training covered important aspects such as policy, safety, environment, and social considerations related to the certification of RSPO and MSPO. He also demonstrated a good understanding of the minimum wage requirements and safety protocols. This indicates a positive outcome from the training session.</p> <p>Management Responses: Noted on the positive comment.</p> <p>Audit Team Findings: Sighted the evidence of contract agreement with transporter including training record.</p>
<p>6</p>	<p>Issues: FFB Transporter The FFB Transporter had given positive feedback about the training provided by management. He mentioned that the training covered important aspects such as policy, safety, environment, and social considerations related to the certification of RSPO and MSPO. He also demonstrated a good understanding of the minimum wage requirements and safety protocols. This indicates a positive outcome from the training session.</p> <p>Management Responses: Noted on the positive comment.</p> <p>Audit Team Findings: Sighted the evidence of contract agreement with transporter including training record.</p>
<p>5</p>	<p>Issues: Police Station Batang Melaka</p>




MSP0 Public Summary Report
Revision 2 (Nov 2021)

	<p>The head of Police Station Batang Melaka has been invited during stakeholder meeting. The discussion regarding on working cooperation to enhance in terms of security. There is No cases of FFB thief, No cases on social issue and No cases of illegal workers.</p>
	<p>Management Responses: Noted on the positive comment.</p>
	<p>Audit Team Findings: Good communication estate with the stakeholder.</p>

3.6 List of Stakeholders Contacted

<p>Government Officer: Police Station Batang Melaka Sek Keb Seri Maju</p>	<p>Community/neighbouring village: Head Villager Kampung Batang Melaka Head Villager Kampung Payamas</p>
<p>Suppliers/Contractors/Vendors: JCB Contractor FFB Transport</p>	<p>Worker’s Representative/Gender Committee: Harvester, Sprayer and Workshop Operator Mill Process Operator Mill Laboratory Analysis Foreign Worker Representative Female Gender Committee</p>

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings		
Based on the findings during the assessment <i>Genting Plantations Berhad, Genting Ayer Item POM</i> Certification Unit complies with the <i>MS 2530-3:2013</i> and <i>MS 2530-4:2013</i> . It is recommended that the certification of <i>Genting Plantations Berhad, Genting Ayer Item POM</i> Certification Unit is continued.		
Acknowledgement of Assessment Findings	of	Report Prepared by
Name: James Chung Khim Hon	Name: Abdul Rahim Wilson Abdullah	Name: NOR HALIS ABU ZAR
Company name: Genting Oil Mill Sdn Bhd	Company name: Genting Plantations Berhad	Company name: BSI SERVICES MALAYSIA SDN BHD
Title: Senior Vice President - Group Processing	Title: Senior Vice President - Plantation (Malaysia)	Title: CLIENT MANAGER
Signature:  Date: 16/04/2024	Signature:  Date: 16/04/2024	Signature:  Date: 08/04/2024

Appendix A: Summary of the findings by Principles and Criteria

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	Genting Plantations Berhad made a policy on sustainable practices, signed by the President and COO, Mr. Yong Chee Kong, on 01/07/2015. The policy shows a commitment to three main things: taking care of people, the environment, and making a profit. The management aims to have a good system for sustainability and follow the rules of MSPO and MPOB codes. Employees were told about this policy through training and briefings, and it's displayed in important places. Training record as below: Genting Kulai Besar Estate: 15/08/2023 Genting Tebong Estate: 04/01/2024 & 08/01/2024 Genting Tanah Merah Estate: 06/01/2024	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The MSPO policy says that the management is dedicated to regularly reviewing and creating new and clever ways, methods, and practices. This is all aimed at getting better and better in our efforts to produce sustainable palm oil.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.	Genting Plantations Berhad has set up Standard Operating Procedures (SOP) for Sustainability Internal Audit, detailed in the Sustainability Management Procedure Manual (SMP-GPB-03, rev. 05 dated 09/2020).	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance												
	- Major compliance -	<p>The headquarters planned and carried out an internal audit. Internal audit record as below:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Date</th> <th>Findings</th> </tr> </thead> <tbody> <tr> <td>Genting Kulai Besar Estate</td> <td>11-15/12/2023</td> <td>6 Major NC</td> </tr> <tr> <td>Genting Tebong Estate</td> <td>16-19/01/2024</td> <td>3 Major NC</td> </tr> <tr> <td>Genting Tanah Merah Estate</td> <td>08-12/01/2024</td> <td>5 Major NC</td> </tr> </tbody> </table> <p>The results of these internal audits for all operating units are documented in the "RSPO, MSPO & ISCC Internal Audit Report" and are accessible for each operating unit.</p>	Estate	Date	Findings	Genting Kulai Besar Estate	11-15/12/2023	6 Major NC	Genting Tebong Estate	16-19/01/2024	3 Major NC	Genting Tanah Merah Estate	08-12/01/2024	5 Major NC	
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Genting Tebong Estate	16-19/01/2024	3 Major NC													
Genting Tanah Merah Estate	08-12/01/2024	5 Major NC													
4.1.2.2	<p>The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.</p> <p>- Major compliance -</p>	<p>Genting Plantations Berhad has created a set of guidelines called the Standard Operating Procedures (SOP) for Sustainability Internal Audit. These guidelines are documented in the Sustainability Management Procedure Manual under the section titled "Sustainability Internal Audit," with document number SMP-GPB-03, revised version 05, dated 09/2020. The root cause, correction and corrective action has been documented for each NC raised.</p>	Complied												
4.1.2.3	<p>Report shall be made available to the management for their review.</p> <p>- Major compliance -</p>	<p>The results of internal audits for all operating units have been recorded in a document titled "RSPO, MSPO & ISCC Internal Audit Report." This report is accessible and available for each operating unit.</p>	Complied												
Criterion 4.1.3 – Management Review															
4.1.3.1	<p>The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.</p> <p>- Major compliance -</p>	<p>Management review has been done for all operating units under Southern Region on 22/01/2024 at Genting Sri Gading Estate. Agenda that has been discussed during the meeting any previous or outstanding issues, changes and improvement on sustainability management systems, complaint, and grievances, etc. Meeting minutes was available where the agenda that discussed as below:</p>	Complied												

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<ol style="list-style-type: none"> 1. Minutes / Action Plan of Previous Meeting 2. RSPO, MSPO and ISCC Audit Schedule and certification Status 3. Changes and improvement on sustainability management system 4. Changes in the system 5. Results of External Audit 6. Result of Internal Audit 7. Organization Performance 8. Complaints and Grievances and Enquiry Register 9. Stakeholder meeting, minutes and complaint and request 10. Greenhouse gases 11. Continual Improvement and recommendation 12. Adequacy of resources 13. Training Requirements 14. Sustainability policies 15. Review of effectiveness / the extent in achieving quality, environmental, social, safety and health objectives and Management plans. 16. Compliance to legal requirement 17. SCC and Traceability 18. Preventive and corrective actions 19. Any other matters 	

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	<p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p>- Major compliance -</p>	<p>The estates have developed a management plan to ensure continuous improvement, addressing social and environmental concerns. This plan is regularly reviewed in January and February each year, taking into account the specific needs and requirements of the estates.</p> <p><u>Genting Kulai Besar Estate</u></p> <ol style="list-style-type: none"> 1. Construct new labour quarters amounted RM X,XXX,XXX.XX 2. OSHA / CPPR Training for workers amounted RM X,XXX.XX 3. PPE cost amounted RM XX,XXX.XX. <p><u>Genting Tebong Estate</u></p> <ol style="list-style-type: none"> 1. Upgrading Toilet & Kitchen for Labour Quarters amounted RM X,XXX.XX 2. 1 Unit of Water Tank and Piping amounted RM X,XXX.XX 3. Safety Signboard amounted RM XX,XXX.XX <p><u>Genting Tanah Merah Estate</u></p> <ol style="list-style-type: none"> 1. New Labour Quarters amounted RM XXX,XXX.XX 2. Lateriting and Upgrading road amounted RM XX,XXX.XX 	<p>Complied</p>
4.1.4.2	<p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p>- Major compliance -</p>	<p>This process is carried out when new projects are confirmed. Employees receive briefings on any new developments in a straightforward manner during weekly briefings. The management team is kept informed during monthly management meetings. Information is shared with the General Manager (GM) and other Heads of Departments through monthly Managers meetings and emails. Funding for machinery and other significant requirements is included in the Capital Expenditure (CAPEX) budget. Sample of new system</p>	<p>Complied</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance								
		implemented was MSGP (Microsoft Dynamics GP) for payroll and accounting system which is pilot trial at Genting Tanah Merah Estate.									
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	When introducing new machines and work methods, all levels of employees undergo training to handle and implement these new techniques and changes in work processes. The Estate Managers and Assistants closely monitor the on-the-job training and familiarization process.	Complied								
4.2 Principle 2: Transparency											
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements											
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance -	The management has established a standard operating procedure for communication to ensure an effective communication system with both internal and external stakeholders. Internal communication with stakeholders is facilitated through morning briefings and internal memos, while external stakeholders are engaged through the invitation of stakeholder meetings. This approach system is consistent communication channels with all relevant parties involved in the organization's operations. Sighted the evidence: Detail information on procedure company: <table border="1" data-bbox="1048 1136 1870 1273"> <tr> <td>Document</td> <td>Procedure Request & Response</td> </tr> <tr> <td>Reference</td> <td>SMP-GPB-25</td> </tr> <tr> <td>Date</td> <td>14/08/2014</td> </tr> <tr> <td>Revision</td> <td>00</td> </tr> </table> Detail information on communication between stakeholder:	Document	Procedure Request & Response	Reference	SMP-GPB-25	Date	14/08/2014	Revision	00	Complied
Document	Procedure Request & Response										
Reference	SMP-GPB-25										
Date	14/08/2014										
Revision	00										

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance								
		Genting Kulai Besar Estate	External stakeholder meeting has conducted 05/09/2023 at meeting room									
		Genting Tebong Estate	External stakeholder meeting has conducted 13/12/2023 at meeting room									
		Genting Tanah Merah Estate	External stakeholder meeting has conducted 30/11/2023 at meeting room									
4.2.1.2	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>The management has established documents that are publicly available, to ensuring that information regarding the Malaysian Sustainable Palm Oil (MSPO) is accessible to all stakeholders and communities in the surrounding area. This transparency initiative aims to raise awareness and ensure that relevant parties are informed about the MSPO standards and the organization's commitment to sustainable practices in the palm oil industry. Sighted the evidence:</p> <p>Detail information on documents publicly:</p> <table border="1"> <thead> <tr> <th>Document</th> <th>Information to Stakeholder</th> </tr> </thead> <tbody> <tr> <td>Policies</td> <td>MSPO Policy Environment Policy Safety & Health Policy Human Right Policy</td> </tr> <tr> <td>Reports</td> <td>EAI Report SIA Report HCV Report Internal & External Audit Report</td> </tr> <tr> <td>Management Plan</td> <td>Pollution Prevention Plan Continual Improvement Plan Safety & Health Plan</td> </tr> </tbody> </table>		Document	Information to Stakeholder	Policies	MSPO Policy Environment Policy Safety & Health Policy Human Right Policy	Reports	EAI Report SIA Report HCV Report Internal & External Audit Report	Management Plan	Pollution Prevention Plan Continual Improvement Plan Safety & Health Plan	Complied
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<p>Criterion 4.2.2 – Transparent method of communication and consultation</p>												

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance								
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>The management had established the standard of procedure for consultation and communication for effective communication system with internal and external stakeholders. For internal stakeholders, the mode of communication is two ways communication, internal memo, notice board, MSPO meeting. This procedure complaint & grievance also was informed to the external stakeholder during stakeholder meeting. Sighted the evidence:</p> <p>Detail information on procedure company:</p> <table border="1"> <tr> <td>Document</td> <td>Procedure Consultation & Communication</td> </tr> <tr> <td>Reference</td> <td>SMP-GPB-17</td> </tr> <tr> <td>Date</td> <td>12/12/2023</td> </tr> <tr> <td>Revision</td> <td>03</td> </tr> </table>	Document	Procedure Consultation & Communication	Reference	SMP-GPB-17	Date	12/12/2023	Revision	03	Complied
Document	Procedure Consultation & Communication										
Reference	SMP-GPB-17										
Date	12/12/2023										
Revision	03										
4.2.2.2	<p>A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.</p> <p>- Minor compliance -</p>	<p>The appointment letter for management official to be responsible for communication and any complaint from stakeholder. This is to ensure the sustainability matters with relevant stakeholders are compiled and recorded. Sighted the evidence:</p> <p>Detail information on Appointment Letter PIC:</p> <table border="1"> <tr> <td>Genting Kulai Besar Estate</td> <td>Appointment Letter dated 30/03/2023 and PIC is Estate Manager.</td> </tr> <tr> <td>Genting Tebong Estate</td> <td>Appointment Letter dated 20/01/2024 and PIC is Office Clerk</td> </tr> <tr> <td>Genting Tanah Merah Estate</td> <td>Appointment Letter dated 02/05/2023 and PIC is Estate Manager</td> </tr> </table>	Genting Kulai Besar Estate	Appointment Letter dated 30/03/2023 and PIC is Estate Manager.	Genting Tebong Estate	Appointment Letter dated 20/01/2024 and PIC is Office Clerk	Genting Tanah Merah Estate	Appointment Letter dated 02/05/2023 and PIC is Estate Manager	Complied		
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4.2.2.3	<p>List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.</p> <p>- Major compliance -</p>	<p>The management has established the list of stakeholders there were information regarding of name, address, telephone number for contractor, supplier, government agency, industry, head of committee surrounding and schools. Sighted the evidence:</p>	Complied								

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance												
		<p>Details information on the list of stakeholders:</p> <table border="1"> <tr> <td>Document</td> <td>List of Stakeholder</td> </tr> <tr> <td>Date</td> <td>31/01/2024</td> </tr> <tr> <td></td> <td>Government Agencies Supplier and contractor Neighbour mill and estate Neighbour village and school Transporter Trade Union Embassy foreign workers</td> </tr> </table> <p>The management has also done conducted stakeholder meeting and the record of minutes of meeting was recorded. During stakeholder meeting, the discussion is all about introduction of company, awareness on MSPO, explanation of complaint procedure, question and answer. Sighted the evidence:</p> <p>Detail information on communication between stakeholder:</p> <table border="1"> <tr> <td>Genting Kulai Besar Estate</td> <td>External stakeholder meeting has conducted 05/09/2023 at meeting room</td> </tr> <tr> <td>Genting Tebong Estate</td> <td>External stakeholder meeting has conducted 13/12/2023 at meeting room</td> </tr> <tr> <td>Genting Tanah Merah Estate</td> <td>External stakeholder meeting has conducted 30/11/2023 at meeting room</td> </tr> </table>	Document	List of Stakeholder	Date	31/01/2024		Government Agencies Supplier and contractor Neighbour mill and estate Neighbour village and school Transporter Trade Union Embassy foreign workers	Genting Kulai Besar Estate	External stakeholder meeting has conducted 05/09/2023 at meeting room	Genting Tebong Estate	External stakeholder meeting has conducted 13/12/2023 at meeting room	Genting Tanah Merah Estate	External stakeholder meeting has conducted 30/11/2023 at meeting room	
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Genting Tanah Merah Estate	External stakeholder meeting has conducted 30/11/2023 at meeting room														
Criterion 4.2.3 – Traceability															
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).	An established Standard Operating Procedure (SOP) for traceability is documented in Genting Plantations Berhad's Sustainable Management Procedure Manual. Specifically, it is outlined in SMP-GPB-09, Revision 06, dated November 2021, and SMP-GPB-33, Revision 00, dated	Complied												

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	September 2020. This SOP is designed for Sustainable Supply Chain and Traceability. It includes details such as the flow chart of Fresh Fruit Bunches (FFB) from harvesting in designated blocks to the mill weighbridge, which generates tickets.	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The estates engage in daily monitoring of the dispatch to the mill, ensuring alignment and tracking of the harvested volume and tonnage sent to the mill. Factors affecting the Fresh Fruit Bunches (FFB) balances in the fields are considered in this process. Various records are maintained, including daily records of FFB harvested and dispatched, along with a summary in the monthly yield statistics. The daily dispatch to the mill is cross-checked against the received amount, with close monitoring of any weight differences.	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The Person in Charge (PIC) for traceability management has been appointed, with responsibilities that include: <ul style="list-style-type: none"> • Ensuring the quality and environmental systems are maintained. • Ensuring that test equipment is in proper working order. • Ensuring that products meet customer targets and quality standards. • Ensuring compliance with all requirements in the Sustainable Palm Oil Certification (SCCS). Confirmation of these appointments has been verified through sighted appointment letters.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	The FFB weighbridge ticket and despatch notes are generated for all transactions to Ayer Item Palm Oil Mill. This set of documents includes the following information, among others, as verified through a sample as below:	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																																													
		<p>Genting Kulai Besar Estate</p> <table border="1"> <thead> <tr> <th></th> <th>Sample 1</th> <th>Sample 2</th> </tr> </thead> <tbody> <tr> <td>Date</td> <td>18/12/2023</td> <td>30/01/2024</td> </tr> <tr> <td>Lorry No</td> <td>JKU18XX</td> <td>WKN64XX</td> </tr> <tr> <td>Ticket No</td> <td>FFB2300XXXXX</td> <td>FFB2400XXXXX</td> </tr> <tr> <td>Weight</td> <td>31.98 MT</td> <td>25.23 MT</td> </tr> </tbody> </table> <p>Genting Tebong Estate</p> <table border="1"> <thead> <tr> <th></th> <th>Sample 1</th> <th>Sample 2</th> </tr> </thead> <tbody> <tr> <td>Date</td> <td>29/01/2024</td> <td>31/12/2023</td> </tr> <tr> <td>Lorry No</td> <td>JUS72XX</td> <td>JKP85XX</td> </tr> <tr> <td>Ticket No</td> <td>FFB2400XXXXX</td> <td>FFB2300XXXXX</td> </tr> <tr> <td>Weight</td> <td>33.12 MT</td> <td>27.35 MT</td> </tr> </tbody> </table> <p>Genting Tanah Merah Estate</p> <table border="1"> <thead> <tr> <th></th> <th>Sample 1</th> <th>Sample 2</th> </tr> </thead> <tbody> <tr> <td>Date</td> <td>26/12/2023</td> <td>02/12/2023</td> </tr> <tr> <td>Lorry No</td> <td>JQY11XX</td> <td>JDJ85XX</td> </tr> <tr> <td>Ticket No</td> <td>FFB2300XXXXX</td> <td>FFB2300XXXXX</td> </tr> <tr> <td>Weight</td> <td>25.88 MT</td> <td>14.37 MT</td> </tr> </tbody> </table>		Sample 1	Sample 2	Date	18/12/2023	30/01/2024	Lorry No	JKU18XX	WKN64XX	Ticket No	FFB2300XXXXX	FFB2400XXXXX	Weight	31.98 MT	25.23 MT		Sample 1	Sample 2	Date	29/01/2024	31/12/2023	Lorry No	JUS72XX	JKP85XX	Ticket No	FFB2400XXXXX	FFB2300XXXXX	Weight	33.12 MT	27.35 MT		Sample 1	Sample 2	Date	26/12/2023	02/12/2023	Lorry No	JQY11XX	JDJ85XX	Ticket No	FFB2300XXXXX	FFB2300XXXXX	Weight	25.88 MT	14.37 MT	
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4.3 Principle 3: Compliance to legal requirements																																																
Criterion 4.3.1 – Regulatory requirements																																																
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	The estates consistently adhere to legal requirements. The compliance with each applicable law and regulation is overseen by estate management, the Regional Office, and the Sustainability Department. Licenses and permits, regulated by various authorities at the Local, State, and Federal levels, are monitored and managed.	Complied																																													

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p><u>Genting Kulai Besar Estate</u></p> <ul style="list-style-type: none"> • MPOB License #508591102000 valid from 01/05/2023 until 30/04/2024 • Nursery License #54006001000 valid from 01/06/2023 until 31/05/2024 • Weighbridge calibration #B1909217 inspected by De Metrology dated 15/03/2023. • Wages deduction permit #TK(NJ) U-21 dated 21/08/2018 • Diesel and Petrol Permit #J004122 valid from 02/09/2021 until 01/09/2024 <p><u>Genting Tebong Estate</u></p> <ul style="list-style-type: none"> • MPOB License #501667602000 valid from 01/04/2023 until 31/03/2024 • Nursery License #539822011000 valid from 01/06/2023 until 31/05/2024 • Diesel permit #M000972 valid from 10/08/2021 until 09/08/2024 • Weighbridge calibration #B2047514 inspected by De Metrology on 22/06/2023 • Air compressor #MK PMT 5455 valid until 06/11/2024 • Abstraction license #BKSAM01531 valid from 01/10/2023 until 30/09/2024 <p><u>Genting Tanah Merah Estate</u></p> <ul style="list-style-type: none"> • MPOB License 611773002000 valid until 01/06/2023 until 31/05/2025 • Diesel permit #MR/PD/SK-0439@SKS33 valid 11/10/2021 until 10/10/2024 	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Weighbridge #A15226290 valid 10/06/2023 until 10/06/2024 • Air Compressor #JH/23 217673 valid until 03/11/2024 • Permit for wages deduction #JTKNJ.PMT/TK(NJ)U-21 dated 08/01/2017 • Schedule waste contractor license #003319 valid from 01/05/2023 until 30/04/2024 • Water Abstraction License #BAKAJ:334/300/05/04/06/1 valid until 31/12/2024 	
4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>The Legal Requirements Register (LRR) encompasses all necessary regulatory obligations and undergoes an annual review. The list of relevant legal and other requirements is available during assessments and is compiled in the Sustainability Management Procedure Manual (SMP-GPB-22), with revision number 12 dated 12/12/2023.</p> <p>The list includes three main sections:</p> <ul style="list-style-type: none"> • Environment/Safety & Health/Social • Best practices & other requirements • International Standards Requirement <p>Among the identified applicable laws and regulations relevant to operations are:</p> <ul style="list-style-type: none"> • Worker’s Minimum Standards Housing & Amenities Act, 1990 • Wildlife Conservation Act 2010 • Land Ordinance (Amended Ordinance) • Employment Insurance Scheme Act 2017 • Windfall Profit Levy OP Amendment Order 2021 • Employment (Amendment) Act 2022 	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Minimum Wages Order 2022 • Anti Sexual harassment Act 2022 • Labor Act (Working Hours). 	
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>The Sustainability Department (SD), located at the Head Office in Wisma Genting, is responsible for monitoring changes in the law. This information is then shared with all plantations and mills within the organization. The SD, along with the Senior Vice President (SVP) Processing (Malaysia), ensures that any new Acts and Regulations are communicated to all estates in the group.</p> <p>The process involves:</p> <ul style="list-style-type: none"> • Communicating with the document publisher for updates. • Outlining this mechanism in the procedure. • Periodically updating the legal register. • Communicating any changes in the legal register to the respective regions. <p>The estates have fully adopted the established Genting Plantations Berhad (GPB) system for identifying, tracking, accessing, and updating legal requirements. This ensures that all relevant legal requirements related to the Malaysian Sustainable Palm Oil (MSPO) are established, implemented, and maintained.</p>	Complied
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>The Estate Managers designate the Chief Clerks as the Persons in Charge (PIC) responsible for updating changes in laws at the estates. The relevant letters confirming these appointments were observed and verified. Based on interview with PIC, confirmed that they have good awareness on the job responsibility to ensure all license and applicable laws and regulation was updated.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	The management takes measures to ensure that their oil palm cultivation activities do not encroach upon the land use rights of other users. This is achieved by verifying the accuracy of legal boundaries through land surveys during the development phase. As of the current assessment, no land disputes have been raised by any stakeholders.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	Estates has provided documents showing legal ownership of their land. Sample checking of land title as below: <u>Genting Kulai Besar Estate</u> Total land title: 27 1. PTD No. 47XXX – 126.34 Ha 2. PTD No. 107XXX – 123.925 Ha 3. PTD No. 47XXX – 118.78 Ha <u>Genting Tebong Estate</u> Total land title: 42 1. GRN 000090XX – 105.5321 Ha 2. GM 00017XXX – 542.6953 Ha 3. GRN 00029XXX – 194.1440 Ha 4. G 00105XX – 109.340 Ha 5. GM 00004XX – 0.465 Ha <u>Genting Tanah Merah Estate</u> Total land title: 33 1. GRN 817XX – 126.86 Ha	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance								
		2. GRN 8175X – 294.248 Ha 3. GRN 842XX – 20.411 Ha 4. GRN 867XX – 127.0207 Ha 5. GRN 867XX – 9.526 Ha									
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	All Estates have conducted a field survey on Boundary stone by Genting Plantations Research Centre. During site verification, the boundary markers are demarcated and visibly maintained on the ground. The sample boundary was verified; <table border="1"> <thead> <tr> <th>Estate</th> <th>Block No</th> </tr> </thead> <tbody> <tr> <td>Genting Kulai Besar Estate</td> <td>Blk 1P09 BR</td> </tr> <tr> <td>Genting Tebong Estate</td> <td>Blk 01C</td> </tr> <tr> <td>Genting Tanah Merah Estate</td> <td>Blk 96</td> </tr> </tbody> </table> Noticed that where the boundary tranches are constructed, the estate boundary stone is seen as located outside the boundary trench.	Estate	Block No	Genting Kulai Besar Estate	Blk 1P09 BR	Genting Tebong Estate	Blk 01C	Genting Tanah Merah Estate	Blk 96	Complied
Estate	Block No										
Genting Kulai Besar Estate	Blk 1P09 BR										
Genting Tebong Estate	Blk 01C										
Genting Tanah Merah Estate	Blk 96										
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	No land disputes have been reported since the last assessment. In the event of any such dispute arising, the case will be managed in accordance with the SMP-GPB-27: Land Acquisition, New Planting & New Development.	N/A								
Criterion 4.3.3 – Customary rights											
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land or negotiated agreements at all the sampled estates.	N/A								

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance						
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	There is no customary land or negotiated agreements at all the sampled estates.	N/A						
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There is no customary land or negotiated agreements at all the sampled estates.	N/A						
4.4 Principle 4: Social responsibility, health, safety and employment condition									
Criterion 4.4.1: Social Impact Assessment (SIA)									
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	<p>The management has identified, and plans are implemented on Social Impact Assessment (SIA) to mitigate the negative impacts and promote the positive ones. Refer Social Impact Assessment (SIA) report, the methodology was done by interview section to local community, interview internal workers and conduct stakeholder meeting. The process of assessment was done through identified stakeholder, social factor, analyse data, meeting, develop and implement action plan. Sighted the evidence:</p> <p>Details information on Social Impact Assessment (SIA):</p> <table border="1"> <tr> <td>Document</td> <td>Social Impact Assessment Report</td> </tr> <tr> <td>Date</td> <td>29/01/2021</td> </tr> <tr> <td>Report By</td> <td>Sustainability Department</td> </tr> </table> <p>Based on the Social Impact Assessment, the management has developed a mitigation action plan to aimed and promoting positive actions to generate beneficial impacts. This plan likely includes strategies and initiatives designed to address identified social issues,</p>	Document	Social Impact Assessment Report	Date	29/01/2021	Report By	Sustainability Department	Complied
Document	Social Impact Assessment Report								
Date	29/01/2021								
Report By	Sustainability Department								

Criterion / Indicator		Assessment Findings	Compliance												
		<p>enhance community well-being, and foster sustainable development within the affected areas.</p> <p>Details information on social management plan:</p> <table border="1"> <thead> <tr> <th>Status</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>Done – completed</td> <td>To conduct the meeting with stakeholder once a year</td> </tr> <tr> <td>Done – completed</td> <td>To display topic discussion at notice board before meeting</td> </tr> <tr> <td>Done – completed</td> <td>To ensure all request are recorded in enquiry register book</td> </tr> <tr> <td>Done – completed</td> <td>To ensure contractors well brief on contract agreement</td> </tr> <tr> <td>Done – completed</td> <td>To ensure workers pay meet the minimum wages</td> </tr> </tbody> </table>	Status	Action Plan	Done – completed	To conduct the meeting with stakeholder once a year	Done – completed	To display topic discussion at notice board before meeting	Done – completed	To ensure all request are recorded in enquiry register book	Done – completed	To ensure contractors well brief on contract agreement	Done – completed	To ensure workers pay meet the minimum wages	
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Criterion 4.4.2: Complaints and grievances															
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>The management has established a system for dealing with complaints and grievances. The management also has provided training to the worker regarding of complaint and grievances procedure. Sighted the evidence:</p> <p>Details information on complaint and grievance procedure:</p> <table border="1"> <thead> <tr> <th>Document</th> <th>Procedure Complaint & Grievance</th> </tr> </thead> <tbody> <tr> <td>Reference</td> <td>SMP-GPB-19</td> </tr> <tr> <td>Date</td> <td>13/05/2022</td> </tr> <tr> <td>Revision</td> <td>05</td> </tr> </tbody> </table>	Document	Procedure Complaint & Grievance	Reference	SMP-GPB-19	Date	13/05/2022	Revision	05	Complied				
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Date	13/05/2022														
Revision	05														

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance								
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	The management has established system to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. Sighted the evidence: Details information on system of complaint & grievance: <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Complaint Form</td> <td>Display at office</td> </tr> <tr> <td>Complaint Flowchart</td> <td>Display at notice board</td> </tr> <tr> <td>Complaint Box</td> <td>Install at office</td> </tr> <tr> <td>Online System</td> <td>Through WhatsApp – Careline</td> </tr> </table>	Complaint Form	Display at office	Complaint Flowchart	Display at notice board	Complaint Box	Install at office	Online System	Through WhatsApp – Careline	Complied
Complaint Form	Display at office										
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4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	The management has established a complaint form at the premises. The complaint form has been used for employees and stakeholders to make any complaint. Anyone can make any complaint and it was recorded in the complaint form and logbook. Sighted the evidence: Details information on system of complaint & grievance: <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Complaint Form</td> <td>Display at office</td> </tr> <tr> <td>Complaint Flowchart</td> <td>Display at notice board</td> </tr> <tr> <td>Complaint Box</td> <td>Install at office</td> </tr> <tr> <td>Online System</td> <td>Through WhatsApp – Careline</td> </tr> </table>	Complaint Form	Display at office	Complaint Flowchart	Display at notice board	Complaint Box	Install at office	Online System	Through WhatsApp – Careline	Complied
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4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	The management has established complaint procedure. Refer complaint procedure upon receipt of grievances, the decision taken to provide a written reply to the employee or stakeholder concerned. The grievance will be acting with immediate superior for the resolution on complaint. Sighted the evidence: Details information sample of complaint & grievance form: <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Genting Kulai Besar Estate</td> <td>Complaint received: 30/10/2023 Complaint resolved: 31/10/2023</td> </tr> <tr> <td>Genting Tebong Estate</td> <td>Complaint received: 31/07/2023 Complaint resolved: 31/07/2023</td> </tr> </table>	Genting Kulai Besar Estate	Complaint received: 30/10/2023 Complaint resolved: 31/10/2023	Genting Tebong Estate	Complaint received: 31/07/2023 Complaint resolved: 31/07/2023	Complied				
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance
		Genting Tanah Merah Estate	Complaint received: 25/05/2023 Complaint resolved: 28/05/2023	
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	Complaints and resolutions for the last 24 months has documented and made available to affected stakeholders upon request. The complaint form was recorded in the office for their monitoring and action taken. Sighted the evidence: Details information sample of complaint & grievance form:		Complied
		Genting Kulai Besar Estate	Complaint received: 30/10/2023 Complaint resolved: 31/10/2023	
		Genting Tebong Estate	Complaint received: 31/07/2023 Complaint resolved: 31/07/2023	
		Genting Tanah Merah Estate	Complaint received: 25/05/2023 Complaint resolved: 28/05/2023	
Criterion 4.4.3: Commitment to contribute to local sustainable development				
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	The management has contributed to local development in consultation with the local communities. There is a record for the CSR programme are made with surrounding community. Sighted the evidence: Details information of CSR from the company:		Complied
		Date	Remark	
		Genting Kulai Besar Estate	Donation to employee during Hari Raya on 19/04/2023 Donation to employee for Majlis Berbuka Puasa on 14/04/2023 Provide venue for SMK Foon Yew High School on 09/12/2023	

Criterion / Indicator		Assessment Findings		Compliance						
		Genting Tebong Estate	Annual Dinner at Club House on 09/03/2023 Donation to employee for Hari Raya on 20/04/2023 Donation foods & drinks to communities on 11/04/2023 Donation to employee for Labour Day on 01/05/2023							
		Genting Tanah Merah Estate	Donation to employee for Hari Raya 19/04/2023 Provide backhoe to Kampung Payamas during gotong royong							
Criterion 4.4.4: Employees safety and health										
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	<p>Genting Plantations Berhad's has established Occupational Safety and Health Policy dated 01/07/2023 signed by President & Chief Operating Officer. All estates under Genting Plantations Berhad adopted with the policy.</p> <p>The policy is available in Bahasa Malaysia and English and has been displayed at the estate notice board as information to the stakeholders.</p> <p>Reviewed the policy has stated that <i>Genting Plantations Berhad will establish and maintain a safe and healthy working environment for all employees and protect others who may be affected by our activities.</i></p> <p>Document review found, the policy has been communicated to the internal and stakeholders as example below:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Internal</th> <th>External</th> </tr> </thead> <tbody> <tr> <td>Genting Kulai Besar Estate</td> <td>15/08/2023</td> <td>Stakeholder meeting on 05/09/2023</td> </tr> </tbody> </table>		Estate	Internal	External	Genting Kulai Besar Estate	15/08/2023	Stakeholder meeting on 05/09/2023	Complied
Estate	Internal	External								
Genting Kulai Besar Estate	15/08/2023	Stakeholder meeting on 05/09/2023								

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings				Compliance
		Genting Tebong Estate	24/07/2023	Stakeholder meeting	on 13/12/2023	
		Genting Tanah Merah Estate	06/01/2024	Stakeholder meeting	on 30/11/2023	
		<p>All visited estates has maintained relevant training record such as attendance list, photo and material of training in appropriate manner.</p> <p>In addition, plan to improve occupational health and safety is evident from the estate's 'Safety & Health Management Plan 2023 & 2024' which includes an information on objective, targets & programs, communication & implementation, training plan, accident & incident statistics, OSH Meetings, HIRARC, ERP, first aid kit, OSH coordinator – PIC, audit and inspection details, OSH action plan & strategies and OSH budget. The OSH plan is signed by estate manager.</p> <p>Evidence of implementation of the OSH plan is verified from the documentation review, site visit and interview with sampled workers during the audit.</p>				
4.4.4.2	<p>The occupational safety and health plan shall cover the following:</p> <p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risks of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied 	<p>a) Occupational Safety and Health Policy dated 01/07/2023 has been established by the company, signed by President & Chief Operating Officer. The policy has been communicated to all workers and stakeholders by displaying in the office, briefing during muster call and stakeholders meeting. Site verification confirms that the safety and health policy has been implemented throughout the plantation activities.</p> <p>Record of briefing the above policy to the workers was conducted as below:</p> <ul style="list-style-type: none"> • Genting Kulai Besar Estate – Briefing that was conducted on 15/08/2023. 				Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<ul style="list-style-type: none"> • Genting Tebong Estate – Briefing that was conducted on 24/07/2023. • Genting Tanah Merah Estate – Briefing that was conducted on 06/01/2024. <p>b) The risk of all operation has been assessed and documented at all visited estates (i.e., Genting Kulai Besar Estate, Genting Tebong Estate and Genting Tanah Merah Estate).</p> <p><u>Genting Kulai Besar Estate</u></p> <p>HIRARC was assessed and documented for all estates operations in document entitled 'Hazard Identification, Risk Assessment & Control Measure – HIRARC Form' updated in 03/01/2023, where health and safety are an issue, in order to determine the significant hazards and implement control measures. Significant hazards determined and documented include noise exposure, pesticides/chemicals, accident, fire, fuel spillage, working at heights, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc.</p> <p>Site visit was conducted at grass cutting using rotoslasher, strip spraying and FFB evacuation (using grabber) activities and it was observed that the workers involved were worn and provided proper PPE as per recommended in the HIRARC.</p> <p>Chemical Health Risk Assessment (CHRA) was conducted on 17/03/2023 by competent person with DOSH registration number HQ/12/ASS/00/309 and HQ/03/ASS/00/154. The assessment was conducted at the work unit of diesel handler, fertiliser application personnel, pesticide application personnel and workshop personnel. Observed during site visit at workstation and estate activities found that recommendation in CHRA were implemented</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>such as PPE usage, emergency response plan (ERP), first aid kit, biological monitoring, etc. Regarding to chemical exposure monitoring, it has been recommended in the CHRA for workshop personnel that exposed to welding fume (manganese). Personal Chemical Exposure Monitoring were conducted on 03/10/2022 and the result indicated that the exposure level airborne contaminants for the selected employees were below permissible limit as stipulated under Schedule I of USECCH Regulation 2000. Based on the welding durations declared in all estates. As a result, from the Chemical Exposure Monitoring (CEM), there is no further requirement to perform any CEM for welding activities at the remaining Genting Ayer Item estate workshops. Current respirator is adequate in protecting workers against potential exposures to welding fumes. Following to this, no CEM to be conducted by the estate as recommended by the CHRA assessor as verified in the letter dated 06/08/2023.</p> <p>No recommendation for medical surveillance were stated in the CHRA report. However, all workers were exposed to the chemical hazards have undergo medical surveillance which is conducted by Estate Hospital Assistant (EHA) by monthly basis. This has been verified in the 'Medical Check-up Manuring and Spraying Record' whereby the weight, height, pulse, fingernails, BMI, blood pressure and eyes were checked by the EHA. Workers exposed to the chemical hazard which consists of mechanic, manurer and pesticide sprayer are fit to work. Based on interview with the workers and Estate Hospital Assistant (EHA), any abnormal result will be reported to Visiting Medical Officer (VMO) for further investigation. Sprayers were interviewed during field visits, and feedback received that they did not have any symptoms of toxic</p>	

**MSPO Public Summary Report
Revision 2 (Nov 2021)**

Criterion / Indicator	Assessment Findings	Compliance
	<p>reactions such as skin infection, throat pain, breathing difficulties or nail problems.</p> <p>Noise Risk Assessment (NRA) was conducted internally on 29/12/2023 and 22/12/2022 by Estate Hospital Assistant (EHA) as verified in the Checklist of Noise Identification Form. From the assessment, it was found that the activity assessed in the assessment were tractor, harvesting, manuring, spraying, general work, workshop, and office.</p> <p>Audiometric Testing Programme conducted to the workers involved in activities exposed to the noise. Audiometric testing programme conducted 30/12/2023 and 17/01/2024 resulted in out of 7 workers inspected, 2 of them declared as having abnormal audiogram. Referring to the recommendation in the audiometric test report, the estate has submitted JKPP 7 form to DOSH on 25/01/2024 for 2 workers that having abnormal audiogram. The Occupational Health Doctor (OHD) also recommend the workers to continue audiometric test annually and provide the workers with hearing protectors. Verification has been made during the site visit and interview with sampled workers. It was found that person who exposed to the noise activity has attended the training regarding to hearing protection and observed they are worn are correct PPE as recommended.</p> <p><u>Genting Tebong Estate</u></p> <p>HIRARC was assessed and documented in document entitled 'Hazard Identification, Risk Assessment & Control Measure – HIRARC Form' updated in 23/01/2024. There were risks identified as significant and control measures determined to mitigate the risks. Significant hazards determined and documented include noise exposure, chemicals/pesticides exposure and accident. It</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>also found procedures and actions implemented to mitigate the hazards.</p> <p>Chemical Health Risk Assessment (CHRA) was conducted on 14/03/2022 by competent person with DOSH registration number HQ/12/ASS/00/309 and HQ/03/ASS/00/154. The assessment was conducted at the work unit of diesel handler, fertiliser application personnel, pesticides application personnel and workshop personnel. Observed during site visit at workstation and estate activities found that recommendation in CHRA were satisfactorily implemented.</p> <p>Although annual medical surveillance for pesticide operators is not compulsory based on the latest CHRA reports, the estates still made an initiative to carry out the medical surveillance for their workers. Monthly clinical checks are carried out by the Estate Hospital Assistant to the workers who are exposed to the chemical hazards. Medical check-up and monthly health checking records were made available during the audit in the document entitled 'Medical Examination Report for Person Handling Chemicals (Sprayers, Manuring Workers, Chemical Mixer, etc.)'.</p> <p>Noise Risk Assessment (NRA) was conducted on 08/04/2021 by competent person with registration number HQ/16/PEB/00/155. In the report, it was found that the activity assessed in the assessment were farm tractor, palm motorized cutter, grasscutter personal and workers operating mistblower. Estate management have taken steps to reduce the noise levels by reducing the exposure time to high noise and mandatory use of ear plugs and displayed warning signages at high noise levels area. Observed during site visit, found that the workers who exposed to the noise were used appropriate PPE as recommended in the NRA report.</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Training for personal hearing protection (PHP) was conducted in 15/02/2023.</p> <p>As per recommended in the NRA report, audiometric test was conducted on 13/12/2023 and the report was received on 23/01/2024. Sighted Audiometric Report which was conducted by competent person with DOSH registration no. HQ/08/DOC/00/333. Out of 28 workers inspected, 9 of them declared as having abnormal hearing. As recommended in the audiometric retest report, the estate has submitted JKKP 7 form for 9 workers that having abnormal hearing to DOSH on 30/01/2024.</p> <p><u>Genting Tanah Merah Estate</u></p> <p>HIRARC was assessed and documented for all estates operations in document entitled 'Hazard Identification, Risk Assessment & Control Measure – HIRARC Form' updated in 23/12/2023. Site visit at harvesting and slashing activities were found that mitigation plan control measure includes in the HIRARC were implemented accordingly. HIRARC is subject for a review in event of the change in work process, revision/changes in legislative requirement and occurrence of accidents.</p> <p>Latest Chemical Hazardous Risk Assessment (CHRA) has been conducted by QMSPRO Sdn Bhd dated 15/03/2022. Report of the CHRA is provided for verification during the audit (Report No: HQ/12/ASS/00/309-2022/004). The assessment has been conducted by competent person with DOSH Registration No: HQ/12/ASS/00/309 and HQ/03/ASS/00/154. Among recommendation in the CHRA is to strictly wear appropriate PPE, bring first aid kit and emergency response plan to the workers exposed to chemical hazards. Number of units identified to be assessed consists of diesel handler, fertilizer application personnel,</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>pesticides application personnel and workshop personnel. Medical surveillance was conducted on 07/07/2023 and 12/10/2023 to the workers exposed to chemical hazards as recommended in the CHRA report on 14/08/2023. All workers undergo medical surveillance is fit to continue their work without any abnormal results. The results have been verified in the report of medical surveillance which is conducted by Occupational Health Doctor (DOSH Reg. No.: HQ/19/DOC/00/00399). In addition, site visit at various workstation including chemical store, fertilizer store, chemical mixing area and workshop found that the workers conducted the work related to chemical were worn appropriate PPE as recommended in the CHRA.</p> <p>Besides that, Noise Risk Assessment was conducted on 09/04/2021 by competent person (DOSH Reg. No.: JH/05/04/1238). Site verification at the estate workstation found that recommendation from the assessment were implemented such as fixing signage hearing protection zone at the noise area and the workers worn personal hearing protection (PHP).</p> <p>Reflecting to the above, there is an Audiometric Test conducted to all workers exposed to noise for the tractor driver, power barrow operator, palm cutter operator and grass cutter operator. Latest programme conducted 21/03/2023 resulted in out of 28 workers inspected, 3 of them declared as having hearing impairment. 3 total workers which having hearing impairment were recommended by OHD to be repeat the test. Following to this, the estates has sent the workers to repeat the test on 27/06/2023 as verified in the Report for Occupational Disease/Poisoning. As recommended in the audiometric retest report, the estate has submitted JKKP 7 form for 3 workers that having hearing</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>impairment to DOSH on 20/07/2023. Training on noise risk at workplace has been conducted on 21/07/2023 and attended by 356 workers.</p> <p>c) Annual training program for the year 2023 and 2024 has been established by each estate include training for the workers who exposed to chemical.</p> <p>i) All workers involved in chemical activity had been adequately trained in safe working practices in objective to ensure the workers have been adequately trained in handling chemical, safe working practices and the correct use of PPE. Record of training were verified are as below:</p> <p><u>Genting Kulai Besar Estate</u></p> <ul style="list-style-type: none"> - Training for PPE that was conducted on 18/11/2023. - Training for chemical premix that was conducted on 08/06/2023. - Training for Workshop SOP that was conducted on 28/08/2023. <p><u>Genting Tebong Estate</u></p> <ul style="list-style-type: none"> - Training for safety of chemical handling, HIRARC on spraying works, premixing chemical and calibration for spraying that was conducted on 08/01/2024. - Training for manuring that was conducted on 05/09/2023. <p><u>Genting Tanah Merah Estate</u></p> <ul style="list-style-type: none"> - Training for triple rinse and puncturing that was conducted on 11/02/2023. 	

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Training for premixing chemical and calibration that was conducted on 30/05/2023. - Training for spraying that was conducted on 05/02/2024. - PPE training that was conducted on 11/02/2023. <p>ii) All precaution attached to the product are available in the safety data sheet (SDS). During site visit at chemical activities area for all visited estates found that implementation of the chemical activities is according to the SDS especially for PPE usage and the emergency procedures.</p> <p>d) All sampled estates have provided appropriate PPE to the workers to cover all potentially hazardous operations as identified in the Hazard Identification, Risk Assessment and Risk Control (HIRARC) and CHRA.</p> <p>Document review found that the company has established '<i>Borang Pemberian/Penggantian PPE</i>' to record any PPE provided to the workers. Example of PPE provided to sprayers are apron, rubber glove, respirator, and rubber boot for sprayer. While for harvester, the estate provided safety helmet, goggle, sickle cover and yellow rubber boot. During site visit at the sampled estate, the PPE were adequately provided and implemented as per HIRARC and found tally with the record of issuance PPE.</p> <p>Further verification is made by interview the sampled workers consists of sprayer, tractor driver, and harvester at all visited estates confirm that PPE they received was free, and the management did not charge any payments for the PPE. If there is any damage or it is time to change to new PPE, the worker only needs to bring the used PPE to the management and the management will issue new PPE to the worker.</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>The management provides adequate shower rooms and soap for employees' use after returning from activities involving chemical application. Lockers are also provided for the convenience of employees to keep clean clothes for them to use to go home. To ensure that no PPE is taken home, the management has provided an area to wash and store PPE.</p> <p>e) All estates adopted the Genting Plantations Berhad procedure entitled 'Chemical Management' (Doc. No.: SMP-GPB-28; Revision: 08; Dated: 11/01/2023) for handling of chemicals to ensure proper and safe handling and storage in accordance with Occupational Safety Health (Classification Packaging and Labelling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. In addition, the following were sighted during site visit at all sampled estates:</p> <ul style="list-style-type: none"> • The stores were built with adequate ventilation and in good condition. • Stores are locked and only authorized person allowed to enter. • Appropriate safety signage is in place. • Chemicals, fertilizers and lubricants are in good arrangement follow the best practices. • Chemicals, fertilizers and lubricants are available with original labelling. <p>f) At all visited estates, estate manager has been appointed as person responsible for safety and health and appointed as Chairman for OSH Committee at their respective unit. Sighted OSH Committee Organization Chart is established by all operating unit audited. Evidence was captured for appointment of estate manager as chairman of OSH Committee is made available in the Memorandum</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>from Senior Manager Operation (SMO) Plantation dated 22/02/2022. Inside the memorandum stated that to appoint estate manager as Chairman of Safety and Health Committee</p> <p>The appointment of estate manager as chairman of a safety and health committee is in line with section 6 (1) of Occupational Safety and Health (Safety and Health Committee) Regulations 1996 where stated an employer or his authorised manager shall be chairman of safety and health committee.</p> <p>g) The company by each estate conducts OSH meeting at quarterly period with employees where their concerns about safety, health and welfare are discussed openly. The meeting was attended by employee and employer representatives. Agenda discuss including accident statistics, review of HIRARC, OSH related matters, workplace inspection report and emergency response plan. Minutes of OSH meeting of sampled estate was verified during the audit are as follows:</p> <p><u>Genting Kulai Besar Estate</u> OSH Committee meeting was conducted on 20/03/2023, 22/06/2023, 14/09/2023 and 14/12/2023.</p> <p><u>Genting Tebong Estate</u> OSH Committee meeting was conducted on 08/03/2023, 08/06/2023, 08/09/2023 and 29/12/2023.</p> <p><u>Genting Tanah Merah Estate</u> OSH Committee meeting was conducted on 24/03/2023, 26/06/2023, 22/09/2023 and 21/12/2023.</p> <p>h) All sampled estates have established 'Emergency Response Procedure' (ERP) includes chemical spillage, fire, accident, and</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>physical injury also were established with list of emergency contact persons and numbers of estates management personnel. The ERP and emergency contact details are displayed at the notice board located at office, workers quarters, chemical and fertilizer store. Emergency response team chart also were made available at each operating unit. On-site interview with workers informed, they are aware of the accident and emergency procedure and able to demonstrate their awareness. Example records of ERP training conducted to estate workers were verified as below:</p> <p><u>Genting Kulai Besar Estate</u></p> <ul style="list-style-type: none"> - Fire Drill Training dated 27/12/2023. <p><u>Genting Tebong Estate</u></p> <ul style="list-style-type: none"> - Emergency Response Plan Training dated 24/07/2023. - Fire Drill & Respond Emergency Training dated 13/07/2023. <p><u>Genting Tanah Merah Estate</u></p> <ul style="list-style-type: none"> - Training on Emergency Response Plan (ERP) and Fire Drill dated 07/03/2023. - Training for Fire Drill dated 20/05/2023. <p>i) Observed during site visit at all sampled estates operations found, first aid kit is available with approved content. Interview conducted with the mandore confirms that they have attended first aid training that was conducted internally by the estate. Each estates have staff which has attended Basic Occupational First Aid (BOFA) and CPR Course which is valid for 2 years. Records of training captured during the audit are as follows:</p> <p><u>Genting Kulai Besar Estate</u></p> <p>First aid training conducted to the workers on 20/01/2023.</p>	

**MSPO Public Summary Report
Revision 2 (Nov 2021)**

Criterion / Indicator	Assessment Findings	Compliance																
	<p><u>Genting Tebong Estate</u> First aid training conducted to the workers on 25/10/2023.</p> <p><u>Genting Tanah Merah Estate</u> First aid training conducted to the workers on 06/02/2024.</p> <p>j) The company by each estates using 'Accident Investigation Report Form' and 'Monthly Accident Statistic Monitoring' to record any incidents occur within the estate area. Estate Hospital Assistant (EHA) is responsible to record any accident cases in the form. All accident were recorded in the form will be used to fill JKPP 8 form. All sampled estates have submitted the JKPP 8 form through MyKKP portal as below:</p> <table border="1" data-bbox="1093 826 1865 1123"> <thead> <tr> <th>Estate</th> <th>Reference No</th> <th>Date Submission</th> <th>No of Mandays Loss</th> </tr> </thead> <tbody> <tr> <td>Genting Kulai Besar Estate</td> <td>JKKP 8/135075/2023</td> <td>18/01/2024</td> <td>35 days</td> </tr> <tr> <td>Genting Tebong Estate</td> <td>JKKP 8/163843/2023</td> <td>15/01/2024</td> <td>0 days</td> </tr> <tr> <td>Genting Tanah Merah Estate</td> <td>JKKP 8/173372/2023</td> <td>29/01/2024</td> <td>4 days</td> </tr> </tbody> </table> <p>All accident cases were review and discussed during the OSH Committee meeting which is conducted quarterly. Sighted one of the agenda in the minutes meeting discussed accident statistics within the estates.</p>	Estate	Reference No	Date Submission	No of Mandays Loss	Genting Kulai Besar Estate	JKKP 8/135075/2023	18/01/2024	35 days	Genting Tebong Estate	JKKP 8/163843/2023	15/01/2024	0 days	Genting Tanah Merah Estate	JKKP 8/173372/2023	29/01/2024	4 days	
Estate	Reference No	Date Submission	No of Mandays Loss															
Genting Kulai Besar Estate	JKKP 8/135075/2023	18/01/2024	35 days															
Genting Tebong Estate	JKKP 8/163843/2023	15/01/2024	0 days															
Genting Tanah Merah Estate	JKKP 8/173372/2023	29/01/2024	4 days															
<p>Criterion 4.4.5: Employment conditions</p>																		

Criterion / Indicator		Assessment Findings	Compliance								
<p>4.4.5.1</p>	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>The management has established policy on good social practice regarding human rights in respect of industrial harmony in the organisation. The policy has been signed by the top management and effectively communicated to the employees through muster briefing at field site. Sighted the document as below evidence:</p> <p>Details information of policy of company:</p> <table border="1"> <tr> <td>Document</td> <td>Social Policy</td> </tr> <tr> <td>Signed By</td> <td>President & Chief Operating Officer</td> </tr> <tr> <td>Date</td> <td>14/09/2020.</td> </tr> <tr> <td>Content of Policy</td> <td> <p>Respect human rights and support international human rights law. Provide safe and healthy working environment. Respect the right of workers to join or form legal trade unions. Not use any child labour. No discrimination in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation. Not commit any physical abuse, threatened, harassment or verbal abuse towards the employees.</p> </td> </tr> </table> <p>Details information of policy has communicated to employee:</p>	Document	Social Policy	Signed By	President & Chief Operating Officer	Date	14/09/2020.	Content of Policy	<p>Respect human rights and support international human rights law. Provide safe and healthy working environment. Respect the right of workers to join or form legal trade unions. Not use any child labour. No discrimination in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation. Not commit any physical abuse, threatened, harassment or verbal abuse towards the employees.</p>	<p>Complied</p>
Document	Social Policy										
Signed By	President & Chief Operating Officer										
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance								
		Genting Kulai Besar Estate	Policy training has conducted on 10/10/2023 during morning muster									
		Genting Tebong Estate	Policy training has conducted on 04/01/2024 during morning muster									
		Genting Tanah Merah Estate	Policy training has conducted on 06/01/2024 during morning muster									
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>The management has established policy that provided equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin to all employee. This policy has effectively communicated to employee through muster briefing and training session. Sighted the evidence:</p> <p>Details information of policy of company:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Document</td> <td>Social Policy</td> </tr> <tr> <td>Signed By</td> <td>President & Chief Operating Officer</td> </tr> <tr> <td>Date</td> <td>14/09/2020.</td> </tr> <tr> <td>Content of Policy</td> <td> Respect human rights and support international human rights law. Provide safe and healthy working environment. Respect the right of workers to join or form legal trade unions. Not use any child labour. No discrimination in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital </td> </tr> </table>		Document	Social Policy	Signed By	President & Chief Operating Officer	Date	14/09/2020.	Content of Policy	Respect human rights and support international human rights law. Provide safe and healthy working environment. Respect the right of workers to join or form legal trade unions. Not use any child labour. No discrimination in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital	Complied
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Criterion / Indicator		Assessment Findings		Compliance																									
			status, union membership or political affiliation. Not commit any physical abuse, threatened, harassment or verbal abuse towards the employees.																										
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>The management has to ensure that employees pay, and condition meet legal or industry minimum standards and as per agreed Collective Agreements. Refer on contract agreement between employer and employee, sighted the basic salary was stated in agreement. Sighted the document as below sample evidence:</p> <p>Details information sample of contract agreement and salary:</p> <table border="1"> <tr><td>Estate</td><td>Genting Kulai Besar Estate</td></tr> <tr><td>Document</td><td>Employment Agreement</td></tr> <tr><td>Employee No</td><td>03XXX</td></tr> <tr><td>Date Agreement</td><td>29/04/2017</td></tr> <tr><td>Category</td><td>Foreign Worker – Tractor Driver</td></tr> <tr><td>Payment Term</td><td>Piecer Rate</td></tr> <tr><td>Working Days</td><td>26 Days</td></tr> <tr><td>Signed</td><td>Employer & employee</td></tr> <tr><td>Basic Salary</td><td>RM62.69 / Day RM1629.94 / Month</td></tr> <tr><td>Pay Slip</td><td>RM51XX.XX – Dec 2023 RM35XX.XX – Nov 2023 RM34XX.XX – Oct 2023</td></tr> </table> <p>Details information sample of contract agreement and salary:</p> <table border="1"> <tr><td>Estate</td><td>Genting Tebong Estate</td></tr> <tr><td>Document</td><td>Employment Agreement</td></tr> <tr><td>Employee No</td><td>03XXX</td></tr> </table>	Estate	Genting Kulai Besar Estate	Document	Employment Agreement	Employee No	03XXX	Date Agreement	29/04/2017	Category	Foreign Worker – Tractor Driver	Payment Term	Piecer Rate	Working Days	26 Days	Signed	Employer & employee	Basic Salary	RM62.69 / Day RM1629.94 / Month	Pay Slip	RM51XX.XX – Dec 2023 RM35XX.XX – Nov 2023 RM34XX.XX – Oct 2023	Estate	Genting Tebong Estate	Document	Employment Agreement	Employee No	03XXX	Complied
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Estate	Genting Tebong Estate																												
Document	Employment Agreement																												
Employee No	03XXX																												

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance
		Date Agreement	04/10/2023	
		Category	Local Worker – Cleaner	
		Payment Term	Fixed Rate	
		Working Days	26 Days	
		Signed	Employer & employee	
		Basic Salary	RM57.69 / Day RM1500.00 / Month	
		Pay Slip	RM23XX.XX – Dec 2023 RM15XX.XX – Nov 2023 RM15XX.XX – Oct 2023	
		Details information sample of contract agreement and salary:		
		Estate	Genting Tanah Merah Estate	
		Document	Employment Agreement	
		Employee No	03XXX	
		Date Agreement	07/10/2023	
		Category	Foreign Worker – Sprayer	
		Payment Term	Piece Rate	
		Working Days	26 Days	
		Signed	Employer & employee	
		Basic Salary	RM57.69 / Day RM1500.00 / Month	
		Pay Slip	RM26XX.XX – Mar 2023 RM26XX.XX – Apr 2023 RM16XX.XX – May 2023	
		Based on the record on pay slip. The payment on employee is meet the industry minimum standard. Based on interview with the random sampling of workers. There are understand the term and condition		

Criterion / Indicator		Assessment Findings	Compliance																																
		stated in employment agreement such basic salary, annul leave, public holiday, working hours, overtime and job description.																																	
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>The management has ensured the contractor are paid his employee based on minimum wages. Sighted also the contractor has provide the contract agreement to his employee. Sighted the evidence:</p> <p>Details information sample of contract agreement for contractor:</p> <table border="1"> <tr><td>Estate</td><td>Genting Kulai Besar Estate</td></tr> <tr><td>Document</td><td>Contract Agreement</td></tr> <tr><td>Contractor</td><td>CXXX FXXX TXXXXXX</td></tr> <tr><td>Scope work</td><td>FFB Transporter</td></tr> <tr><td>Date Agreement</td><td>01/07/2023</td></tr> <tr><td>Signed</td><td>Contractor & Employee</td></tr> <tr><td>Payment Term</td><td>Piece Rate</td></tr> <tr><td>Pay Slip</td><td>RM39XX.XX – Dec 2023 RM42XX.XX – Nov 2023 RM31XX.XX – Oct 2023</td></tr> </table> <p>Details information sample of contract agreement for contractor:</p> <table border="1"> <tr><td>Estate</td><td>Genting Tebong Estate</td></tr> <tr><td>Document</td><td>Contract Agreement</td></tr> <tr><td>Contractor</td><td>MXXX JXXXX SXX BXX</td></tr> <tr><td>Scope work</td><td>FFB Transporter</td></tr> <tr><td>Date Agreement</td><td>01/01/2023</td></tr> <tr><td>Signed</td><td>Contractor & Employee</td></tr> <tr><td>Payment Term</td><td>Piece Rate</td></tr> <tr><td>Pay Slip</td><td>RM33XX.XX – Jul 2023 RM40XX.XX – Jun 2023 RM43XX.XX – May 2023</td></tr> </table>	Estate	Genting Kulai Besar Estate	Document	Contract Agreement	Contractor	CXXX FXXX TXXXXXX	Scope work	FFB Transporter	Date Agreement	01/07/2023	Signed	Contractor & Employee	Payment Term	Piece Rate	Pay Slip	RM39XX.XX – Dec 2023 RM42XX.XX – Nov 2023 RM31XX.XX – Oct 2023	Estate	Genting Tebong Estate	Document	Contract Agreement	Contractor	MXXX JXXXX SXX BXX	Scope work	FFB Transporter	Date Agreement	01/01/2023	Signed	Contractor & Employee	Payment Term	Piece Rate	Pay Slip	RM33XX.XX – Jul 2023 RM40XX.XX – Jun 2023 RM43XX.XX – May 2023	Complied
Estate	Genting Kulai Besar Estate																																		
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Contractor	CXXX FXXX TXXXXXX																																		
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Criterion / Indicator		Assessment Findings	Compliance																								
		Based on the record on pay slip. The payment of contractor to his employee is more than industry minimum standard.																									
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The management has established records that provide an accurate account of all employees on the premises. The records have been containing the full names, gender, date of birth, date of entry, a job description, wage and the period of employment. Sighted the document as below sample evidence:</p> <p>Details information sample of contract agreement of worker:</p> <table border="1"> <tr> <td>Estate</td> <td>Genting Kulai Besar Estate</td> </tr> <tr> <td>Document</td> <td>Employment Agreement</td> </tr> <tr> <td>Employee No</td> <td>03XXX</td> </tr> <tr> <td>Date Agreement</td> <td>29/04/2017</td> </tr> <tr> <td>Category</td> <td>Foreign Worker – Tractor Driver</td> </tr> <tr> <td>Detail Information</td> <td>Full names, gender, date of birth, date of entry, a job description, wage, annual leave, public holiday, working time and date entry available in agreement.</td> </tr> </table> <p>Details information sample of contract agreement of worker:</p> <table border="1"> <tr> <td>Estate</td> <td>Genting Tebong Estate</td> </tr> <tr> <td>Document</td> <td>Employment Agreement</td> </tr> <tr> <td>Employee No</td> <td>02XXX</td> </tr> <tr> <td>Date Agreement</td> <td>04/10/2023</td> </tr> <tr> <td>Category</td> <td>Foreign Worker – General Work</td> </tr> <tr> <td>Detail Information</td> <td>Full names, gender, date of birth, date of entry, a job description, wage, annual leave, public holiday, working time and date entry available in agreement.</td> </tr> </table>	Estate	Genting Kulai Besar Estate	Document	Employment Agreement	Employee No	03XXX	Date Agreement	29/04/2017	Category	Foreign Worker – Tractor Driver	Detail Information	Full names, gender, date of birth, date of entry, a job description, wage, annual leave, public holiday, working time and date entry available in agreement.	Estate	Genting Tebong Estate	Document	Employment Agreement	Employee No	02XXX	Date Agreement	04/10/2023	Category	Foreign Worker – General Work	Detail Information	Full names, gender, date of birth, date of entry, a job description, wage, annual leave, public holiday, working time and date entry available in agreement.	Complied
Estate	Genting Kulai Besar Estate																										
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Employee No	03XXX																										
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																
		<p>Details information sample of contract agreement of worker:</p> <table border="1"> <tr> <td>Estate</td> <td>Genting Tanah Merah Estate</td> </tr> <tr> <td>Document</td> <td>Employment Agreement</td> </tr> <tr> <td>Employee No</td> <td>03XXX</td> </tr> <tr> <td>Date Agreement</td> <td>07/10/2023</td> </tr> <tr> <td>Category</td> <td>Foreign Worker – Sprayer</td> </tr> <tr> <td>Detail Information</td> <td>Full names, gender, date of birth, date of entry, a job description, wage, annual leave, public holiday, working time and date entry available in agreement.</td> </tr> </table>	Estate	Genting Tanah Merah Estate	Document	Employment Agreement	Employee No	03XXX	Date Agreement	07/10/2023	Category	Foreign Worker – Sprayer	Detail Information	Full names, gender, date of birth, date of entry, a job description, wage, annual leave, public holiday, working time and date entry available in agreement.					
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4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>All employees have been provided with fair contracts that have been signed by both employee and employer. The copy of employment contract is available for each employee and it was kept as employment records. Sighted the evidence:</p> <p>Details information sample of contract agreement of worker:</p> <table border="1"> <tr> <td>Estate</td> <td>Genting Kulai Besar Estate</td> </tr> <tr> <td>Document</td> <td>Employment Agreement</td> </tr> <tr> <td>Employee No</td> <td>03XXX</td> </tr> <tr> <td>Date Agreement</td> <td>29/04/2017</td> </tr> <tr> <td>Category</td> <td>Foreign Worker – Tractor Driver</td> </tr> <tr> <td>Signed</td> <td>Employer & employee</td> </tr> <tr> <td>Observation</td> <td>Copy of agreement has provided to employee. The payment has been paid as per contract agreement</td> </tr> </table> <p>Details information sample of contract agreement of worker:</p> <table border="1"> <tr> <td>Estate</td> <td>Genting Tebong Estate</td> </tr> </table>	Estate	Genting Kulai Besar Estate	Document	Employment Agreement	Employee No	03XXX	Date Agreement	29/04/2017	Category	Foreign Worker – Tractor Driver	Signed	Employer & employee	Observation	Copy of agreement has provided to employee. The payment has been paid as per contract agreement	Estate	Genting Tebong Estate	Complied
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Estate	Genting Tebong Estate																		

**MSPO Public Summary Report
Revision 2 (Nov 2021)**

Criterion / Indicator		Assessment Findings		Compliance
		Document	Employment Agreement	
		Employee No	02XXX	
		Date Agreement	04/10/2023	
		Category	Foreign Worker – General Work	
		Signed	Employer & employee	
		Observation	Copy of agreement has provided to employee. The payment has been paid as per contract agreement	
		Details information sample of contract agreement of worker:		
		Estate	Genting Tanah Merah Estate	
		Document	Employment Agreement	
		Employee No	03XXX	
		Date Agreement	07/10/2023	
		Category	Foreign Worker – Sprayer	
		Signed	Employer & employee	
		Observation	Copy of agreement has provided to employee. The payment has been paid as per contract agreement	
		Based on interview with the random sampling of workers. There are understand the term and condition stated in employment agreement such basic salary, annul leave, public holiday, working hours, overtime and job description.		
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.	The management has established a time recording system that makes working hours and overtime transparent for both employees and		Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance																																						
<p>- Major compliance -</p>	<p>employer. The overtime has recorded transparent in the pay slip of employee. Sighted the evidence: Details information sample of payslip of employee:</p> <table border="1" data-bbox="1048 544 1872 914"> <tr><td>Estate</td><td>Genting Kulai Besar Estate</td></tr> <tr><td>Document</td><td>Pay Slip</td></tr> <tr><td>Employee No</td><td>03XXX</td></tr> <tr><td>Category</td><td>Local Staff – Office Clerk</td></tr> <tr><td>Working Hour</td><td>7.5 Hours</td></tr> <tr><td>Overtime Approved</td><td>104 Hour</td></tr> <tr><td>Overtime calculated</td><td>Basic Wage / 7.5 Hr x 1.5 (Normal) Basic Wage / 7.5 Hr x 2.0 (Rest Day) Basic Wage / 7.5 hr x 3.0 (Public Day)</td></tr> <tr><td>Pay Slip Dec 2023</td><td>Overtime: 48 Hours @ RM5XX.XX</td></tr> <tr><td>Pay Slip Nov 2023</td><td>Overtime: 38 Hours @ RM4XX.XX</td></tr> </table> <p>Details information sample of payslip of employee:</p> <table border="1" data-bbox="1048 962 1872 1361"> <tr><td>Estate</td><td>Genting Tebong Estate</td></tr> <tr><td>Document</td><td>Pay Slip</td></tr> <tr><td>Employee No</td><td>02XXX</td></tr> <tr><td>Category</td><td>Foreign Worker – General Work</td></tr> <tr><td>Working Hour</td><td>7.5 Hours</td></tr> <tr><td>Overtime Approved</td><td>104 Hour</td></tr> <tr><td>Overtime calculated</td><td>Basic Wage / 7.5 Hr x 1.5 (Normal) Basic Wage / 7.5 Hr x 2.0 (Rest Day) Basic Wage / 7.5 hr x 3.0 (Public Day)</td></tr> <tr><td>Pay Slip Dec 2023</td><td>Overtime: 75 Hours @ RM9XX.XX</td></tr> <tr><td>Pay Slip Nov 2023</td><td>Overtime: 72 Hours @ RM8XX.XX</td></tr> <tr><td>Pay Slip Oct 2023</td><td>Overtime: 63 Hours @ RM7XX.XX</td></tr> </table>	Estate	Genting Kulai Besar Estate	Document	Pay Slip	Employee No	03XXX	Category	Local Staff – Office Clerk	Working Hour	7.5 Hours	Overtime Approved	104 Hour	Overtime calculated	Basic Wage / 7.5 Hr x 1.5 (Normal) Basic Wage / 7.5 Hr x 2.0 (Rest Day) Basic Wage / 7.5 hr x 3.0 (Public Day)	Pay Slip Dec 2023	Overtime: 48 Hours @ RM5XX.XX	Pay Slip Nov 2023	Overtime: 38 Hours @ RM4XX.XX	Estate	Genting Tebong Estate	Document	Pay Slip	Employee No	02XXX	Category	Foreign Worker – General Work	Working Hour	7.5 Hours	Overtime Approved	104 Hour	Overtime calculated	Basic Wage / 7.5 Hr x 1.5 (Normal) Basic Wage / 7.5 Hr x 2.0 (Rest Day) Basic Wage / 7.5 hr x 3.0 (Public Day)	Pay Slip Dec 2023	Overtime: 75 Hours @ RM9XX.XX	Pay Slip Nov 2023	Overtime: 72 Hours @ RM8XX.XX	Pay Slip Oct 2023	Overtime: 63 Hours @ RM7XX.XX	
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance												
		Based on interview with the random sampling of workers. They are informed that overtime has paid as per stated in agreement and no deduction overtime.													
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance -	<p>The working hours and breaks of each individual employee as indicated in the time records has comply with legal regulations and collective agreements. Sighted the evidence:</p> <p>Details information of working hours for employee (Office Clerk):</p> <table border="1"> <tr> <td>Working Time</td> <td>08:00am – 5:00pm</td> </tr> <tr> <td>Rest Time</td> <td>1:00pm – 2:30pm</td> </tr> <tr> <td>Working Hours</td> <td>7.5 Hours</td> </tr> </table> <p>Details information of working hours for employee (Harvester):</p> <table border="1"> <tr> <td>Working Time</td> <td>06:30am – 4:30pm</td> </tr> <tr> <td>Rest Time</td> <td>12:00pm – 2:30pm</td> </tr> <tr> <td>Working Hours</td> <td>7.5 Hours</td> </tr> </table>	Working Time	08:00am – 5:00pm	Rest Time	1:00pm – 2:30pm	Working Hours	7.5 Hours	Working Time	06:30am – 4:30pm	Rest Time	12:00pm – 2:30pm	Working Hours	7.5 Hours	Complied
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Working Time	06:30am – 4:30pm														
Rest Time	12:00pm – 2:30pm														
Working Hours	7.5 Hours														
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	<p>Based on the payslips and check roll book sampled. There is evidence that wages and overtime payment are in line with the government act and regulation. Sighted the evidence:</p> <p>Details information sample of payslip of worker:</p> <table border="1"> <tr> <td>Estate</td> <td>Genting Kulai Besar Estate</td> </tr> <tr> <td>Document</td> <td>Employment Agreement</td> </tr> <tr> <td>Employee No</td> <td>03XXX</td> </tr> <tr> <td>Date Agreement</td> <td>29/04/2017</td> </tr> <tr> <td>Basic Wages</td> <td>Sighted basic salary in Pay Slip The salary meets the minimum wages</td> </tr> <tr> <td>Overtime</td> <td>Sighted overtime paid in Pay Slip The overtime not over than limit</td> </tr> </table>	Estate	Genting Kulai Besar Estate	Document	Employment Agreement	Employee No	03XXX	Date Agreement	29/04/2017	Basic Wages	Sighted basic salary in Pay Slip The salary meets the minimum wages	Overtime	Sighted overtime paid in Pay Slip The overtime not over than limit	Complied
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance												
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Basic Wages	Sighted basic salary in Pay Slip The salary meets the minimum wages														
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4.4.5.10	<p>Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.</p> <p>- Minor compliance -</p>	<p>Social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, medical care and health provisions. Sighted the evidence.</p> <p>Details information sample of benefit to employee:</p> <table border="1"> <tr> <td>Medical</td> <td>Medical treatment support by company</td> </tr> <tr> <td>Housing</td> <td>Housing for all workers</td> </tr> <tr> <td>Water supply</td> <td>Water supply provide by company</td> </tr> <tr> <td>Electric supply</td> <td>Electric supply provided by company and have subsidies for all workers</td> </tr> </table>	Medical	Medical treatment support by company	Housing	Housing for all workers	Water supply	Water supply provide by company	Electric supply	Electric supply provided by company and have subsidies for all workers	Complied				
Medical	Medical treatment support by company														
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4.4.5.11	<p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p>- Major compliance -</p>	<p>The management has provided the workers housing at line site were provided with facilities provided such as treated water and electricity. The management also has conducted the housing inspection to ensure the housekeeping in good condition. Sighted the evidence:</p> <p>Details information employee residence and facilities:</p> <table border="1"> <tr> <td>Housing</td> <td>Housing for all workers</td> </tr> <tr> <td>Water supply</td> <td>Water supply provide by company</td> </tr> </table>	Housing	Housing for all workers	Water supply	Water supply provide by company	Complied								
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance												
		Electric supply	Electric supply provided by company and have subsidies for all workers													
		Line site Inspection	Line site inspection has maintained by HA by weekly basis													
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	<p>The management has established a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. Sighted document as below evidence:</p> <p>Details information of policy of company:</p> <table border="1"> <tr> <td>Document</td> <td>Sexual Harassment Policy</td> </tr> <tr> <td>Signed By</td> <td>Chief Operating Office</td> </tr> <tr> <td>Date</td> <td>03/08/2009</td> </tr> <tr> <td>Genting Kulai Besar Estate</td> <td>Policy training has conducted on 10/10/2023 during morning muster</td> </tr> <tr> <td>Genting Tebong Estate</td> <td>Policy training has conducted on 04/01/2024 during morning muster</td> </tr> <tr> <td>Genting Tanah Merah Estate</td> <td>Policy training has conducted on 06/01/2024 during morning muster</td> </tr> </table> <p>Based on interview with the female worker representative, there is No issue and No record complaint that related sexual harassment happen in the estate. Besides that, they are aware on compliant procedure and method of complaint.</p>		Document	Sexual Harassment Policy	Signed By	Chief Operating Office	Date	03/08/2009	Genting Kulai Besar Estate	Policy training has conducted on 10/10/2023 during morning muster	Genting Tebong Estate	Policy training has conducted on 04/01/2024 during morning muster	Genting Tanah Merah Estate	Policy training has conducted on 06/01/2024 during morning muster	Complied
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4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their	<p>The management has respected the right of all employees to form or join trade union. The employees have been given the freedom to join a trade union relevant to the industry where is sighted the workers association in operating unit. Sighted the evidence:</p> <p>Details information of policy of company:</p> <table border="1"> <tr> <td>Document</td> <td>Social Policy</td> </tr> </table>		Document	Social Policy	Complied										
Document	Social Policy															

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance								
	work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	<table border="1"> <tr> <td>Signed By</td> <td>President & Chief Operating Officer</td> </tr> <tr> <td>Date</td> <td>14/09/2020.</td> </tr> <tr> <td>Content of Policy</td> <td>Respect human rights and support international human rights law. Respect the right of workers to join or form legal trade unions</td> </tr> </table> <p>Based on interview with the representative of employee. They are informed that currently practice is regular meeting with the employee committee and management team for discussion and to meet objective.</p>	Signed By	President & Chief Operating Officer	Date	14/09/2020.	Content of Policy	Respect human rights and support international human rights law. Respect the right of workers to join or form legal trade unions				
Signed By	President & Chief Operating Officer											
Date	14/09/2020.											
Content of Policy	Respect human rights and support international human rights law. Respect the right of workers to join or form legal trade unions											
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children and young persons is acceptable on family farms, under adult supervision, and when not interfering with their education. They shall not be exposed to hazardous working conditions. - Major compliance -	<p>The management has established policy that focus on children and young person is not employed or exploited. The minimum age complies with local, state, and national legislation. During audit time, there was not sighted the children or young person was working and no record in workers master list. Sighted the evidence:</p> <p>Details information of policy of company:</p> <table border="1"> <tr> <td>Document</td> <td>Social Policy</td> </tr> <tr> <td>Signed By</td> <td>President & Chief Operating Officer</td> </tr> <tr> <td>Date</td> <td>14/09/2020.</td> </tr> <tr> <td>Content of Policy</td> <td>Not use any child labour.</td> </tr> </table> <p>From the interview and record of employee there is No evidence of children and young person employ in estate.</p>	Document	Social Policy	Signed By	President & Chief Operating Officer	Date	14/09/2020.	Content of Policy	Not use any child labour.		Complied
Document	Social Policy											
Signed By	President & Chief Operating Officer											
Date	14/09/2020.											
Content of Policy	Not use any child labour.											
Criterion 4.4.6: Training and competency												
4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of	All employees and contractors undergo proper training. The estates' management has established a training matrix and training program		Complied								

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance																																										
<p>training needs and documentation, including records of training shall be kept.</p> <p>- Major compliance -</p>	<p>for the year 2023 and 2024 to ensure that relevant and necessary training is provided to individuals.</p> <p>Genting Kulai Besar Estate</p> <table border="1" data-bbox="1048 544 1868 847"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>EFB Application</td> <td>13/01/2023</td> </tr> <tr> <td>Harvesting Training</td> <td>20/12/2023</td> </tr> <tr> <td>Training for Driver</td> <td>21/12/2023</td> </tr> <tr> <td>PPE and Safety Training</td> <td>18/11/2023</td> </tr> <tr> <td>Spraying Training</td> <td>15/11/2023</td> </tr> <tr> <td>Calibration & Inter pump Training</td> <td>06/07/2023</td> </tr> <tr> <td>Chemical Mixing Training</td> <td>08/06/2023</td> </tr> <tr> <td>HIRARC Training</td> <td>12/04/2023</td> </tr> </tbody> </table> <p>Genting Tebong Estate</p> <table border="1" data-bbox="1048 895 1868 1198"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Safety of Chemical Handling</td> <td>08/01/2024</td> </tr> <tr> <td>HIRARC on Spraying Works</td> <td>08/01/2024</td> </tr> <tr> <td>Contractor Training</td> <td>12/12/2023</td> </tr> <tr> <td>IPM Training</td> <td>05/09/2023</td> </tr> <tr> <td>Chemical Store Safety Training</td> <td>15/08/2023</td> </tr> <tr> <td>Fire Drill and ERP Training</td> <td>13/07/2023</td> </tr> <tr> <td>PPE briefing training</td> <td>02/02/2023</td> </tr> <tr> <td>Triple Rinsing training</td> <td>15/02/2023</td> </tr> </tbody> </table> <p>Genting Tanah Merah Estate</p> <table border="1" data-bbox="1048 1246 1868 1374"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>First aid Box Training</td> <td>06/02/2024</td> </tr> <tr> <td>Checking Spraying Pump Equipment Training</td> <td>05/02/2024</td> </tr> </tbody> </table>	Training	Date	EFB Application	13/01/2023	Harvesting Training	20/12/2023	Training for Driver	21/12/2023	PPE and Safety Training	18/11/2023	Spraying Training	15/11/2023	Calibration & Inter pump Training	06/07/2023	Chemical Mixing Training	08/06/2023	HIRARC Training	12/04/2023	Training	Date	Safety of Chemical Handling	08/01/2024	HIRARC on Spraying Works	08/01/2024	Contractor Training	12/12/2023	IPM Training	05/09/2023	Chemical Store Safety Training	15/08/2023	Fire Drill and ERP Training	13/07/2023	PPE briefing training	02/02/2023	Triple Rinsing training	15/02/2023	Training	Date	First aid Box Training	06/02/2024	Checking Spraying Pump Equipment Training	05/02/2024	
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MSPO Public Summary Report
Revision 2 (Nov 2021)

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PPE safety training	08/01/2024												
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>The estate has devised a comprehensive training program for mill executives, workers, and contractors based on a training needs analysis. This analysis is documented in the Training Matrix analysis, which considers job designations and identifies various types of training needs for employees. The training types are categorized into three groups: Core training, non-core training – theoretical training, and non-core training – theoretical and hands-on training. Identified training needs have been planned and implemented.</p>	Complied										
4.4.6.3	<p>A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>The estate maintains an annual training program that is updated through a training needs analysis. The identified training sessions are scheduled throughout the year, with the latest programming being dated January 2024. This ensures that training initiatives align with the evolving needs of the estate's workforce.</p>	Complied										
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services													
Criterion 4.5.1: Environmental Management Plan													
4.5.1.1	<p>An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Management has established an Environment Policy signed by Chief Operating Officer) dated 05/10/2009. Based on the Environmental Policy, the Company is committed to the implementation of the following practices:</p>	Complied										

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Comply with all applicable laws and other regulations about the Environment; • Adopt suitable pollution prevention measures that will enhance the current practices towards sustainable development; • Set realistic goals and monitor progress to ensure continual improvement in environmental performance; and • Ensure that our stakeholders are aware of and share our commitment to responsible environmental stewardship. <p>The policy and plan were communicated to the employees through various methods such as training, briefings, and display on notice boards.</p>	
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations.</p> <p>- Major compliance -</p>	<p>Sighted that the environment management plan has covering;</p> <p>a. Management has established an Environment Policy signed by Chief Operating Officer dated 05/10/2009.</p> <p>b. The management has established an Environmental Aspect and Impact Assessment. The EAIA covers the following Estate activities: -</p> <ol style="list-style-type: none"> 1. Pesticide Application 2. Fertilizer Application 3. EFB and Bunch Ash Application 4. POME, Decanter Cake application 5. Harvesting, Pruning, and Buffalo Infield Collection 6. Chemical Store 7. Etc <p>The EAIA is updated annually, and the recent update is as follows:</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings				Compliance										
		<table border="1" style="width: 100%;"> <tr> <td>Estate</td> <td>Date Updated</td> </tr> <tr> <td>Genting Kulai Besar Estate</td> <td>22/1/2024</td> </tr> <tr> <td>Genting Tebong Estate</td> <td>06/01/2024</td> </tr> <tr> <td>Genting Tanah Merah Estate</td> <td>05/01/2024</td> </tr> </table>		Estate	Date Updated	Genting Kulai Besar Estate	22/1/2024	Genting Tebong Estate	06/01/2024	Genting Tanah Merah Estate	05/01/2024					
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Genting Tebong Estate	06/01/2024															
Genting Tanah Merah Estate	05/01/2024															
		Sample taken on Handling of Pesticides Containers Activity: -														
		Environmental Aspects	Disposal of used chemical containers													
		Legal Requirement	OSHA, EQA, RSPO													
		Mitigation Plan	Triple rinse & puncture													
			To ensure after triple rinse & puncture, all empty container being keep in store for disposal.													
			Training and briefing on chemical handling													
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>The Environmental Management Plan for the year 2024 has developed the mitigation of the negative impacts and to promote the positive one. The mitigation is documented under the Environment Improvement & Management Plan. The sample taken from the Environment Improvement Plan;</p> <table border="1" style="width: 100%;"> <thead> <tr> <th>Estate</th> <th>Activity</th> <th>Negative Impact</th> <th>Mitigation Plan</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>Genting Kulai Besar Estate</td> <td>Protection of HCV areas</td> <td>Loss of HCV areas and ERT Species</td> <td>Protection and demarcation of HCV area within estate and sensitive area.</td> <td>HCV Report</td> </tr> </tbody> </table>				Estate	Activity	Negative Impact	Mitigation Plan	Action Plan	Genting Kulai Besar Estate	Protection of HCV areas	Loss of HCV areas and ERT Species	Protection and demarcation of HCV area within estate and sensitive area.	HCV Report	Major Non Compliance
Estate	Activity	Negative Impact	Mitigation Plan	Action Plan												
Genting Kulai Besar Estate	Protection of HCV areas	Loss of HCV areas and ERT Species	Protection and demarcation of HCV area within estate and sensitive area.	HCV Report												

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings					Compliance
					Training/ communication		
		Genting Tebong Estate	Oil Spillage & leaking	Soil and water pollution	Reduce oil spillage Avoid spillage	Environment Improvement Plan Report	
		Genting Tanah Merah Estate	Water Pollution- Groundwater pollution from waste water, septic tank or landfill	Seepage of raw sewage into ground or surface water	Regular maintenance of septic tank system Improving septic tank design in future development	Environment Improvement Plan Report	
<p>An environmental improvement plan to mitigate the negative impacts was not effectively implemented and monitored.</p> <p>Environment Improvement & Management Plan and Biodiversity Action Plan; Revision, Dated 31/05/2023 on Soil Pollution (Oil spillage & Leaking) –Monitoring & Action Plan requires the management to identify leaking vehicle and shall carry out repair soonest possible. Provide a tray underneath until the repairs are done. The site visit to the tractor garage in Genting Kulai Besar Estate & Genting Tebong Estate Home & Batang Melaka Division found the indication that the oil engine leaked onto the ground from the mini</p>							

Criterion / Indicator		Assessment Findings	Compliance																								
		tractor Yammar 100 and New Holland TN75. Thus, Major NC was raised.																									
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	All the Estates have established a Continuous Improvement Plan dated 22/01/2024 which consists of the following: - a. Minimize usage of certain pesticides b. Environmental Impacts c. Waste Reduction d. Pollution and Greenhouse Emissions e. Social Impacts f. A mechanism to capture the performance and expenditure in social and environmental aspects g. Encourage optimizing the yield of the supply base h. Workers personal file i. Water consumption and water quality j. Health and Safety Performance	Complied																								
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	The Estate has established Environmental Training Program 2024 as below: - <table border="1" data-bbox="1048 1102 1883 1374"> <thead> <tr> <th>No</th> <th>Training Programs</th> <th>No of Participants</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td colspan="4">a. Genting Kulai Besar Estate</td> </tr> <tr> <td>1</td> <td>Buffer Zone Training</td> <td>15</td> <td>14/03/2023</td> </tr> <tr> <td>2</td> <td>Triple rinsing & Premix operation Training</td> <td>13</td> <td>08/09/2023</td> </tr> <tr> <td colspan="4">b. Genting Tebong Estate</td> </tr> <tr> <td>1</td> <td>Waste Management Training</td> <td>12</td> <td>25/11/2023</td> </tr> </tbody> </table>	No	Training Programs	No of Participants	Date	a. Genting Kulai Besar Estate				1	Buffer Zone Training	15	14/03/2023	2	Triple rinsing & Premix operation Training	13	08/09/2023	b. Genting Tebong Estate				1	Waste Management Training	12	25/11/2023	Complied
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings				Compliance
		2	Spraying & Chemical Handling Training	12	13/09/2023	
		c. Genting Tanah Merah Estate				
		1	Riparian & Buffer Zone training	11	6/05/2023	
		2	Oil Spillage Management Training	11	10/04/2023	
		3	Water Sampling Training	11	10/04/2023	
		Interviews with staff/workers during the site visit to the HCV area, buffer zone areas, EFB application plots, replanting areas, workshop, chemical premixing station, scheduled waste store & landfill they demonstrated good awareness of environmental issues.				
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	Environmental meeting has been conducted as follows: -				Complied
		No	Meeting	No of Participants	Date	
		a. Genting Kulai Besar Estate				
		1	Environment Performance Monitoring Committee Meeting	14	30/03/2023	
		2	Environment Performance Monitoring Committee Meeting	15	19/06/2023	
		b. Genting Tebong Estate				
		1	Environment Performance Monitoring Committee Meeting	9	20/06/2023	
		2	Environment Performance Monitoring Committee Meeting	9	20/12/2023	
		c. Genting Tanah Merah Estate				
		1	Environment Committee Meeting	11	13/06/2023	
		2	Environment Committee Meeting	11	27/12/2023	

Criterion / Indicator		Assessment Findings	Compliance																																																																						
		The minutes of the meeting discussed the Status of beneficial plants, renewable usage, road maintenance, EFB application, domestic waste, schedule waste, open burning, buffer zone, HCV, illegal fishing/hunting & recycling.																																																																							
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																																																																									
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance -	<p>The monthly record of monitoring the usage of Diesel consumption of the Estates was kept and documented. It is monitored to optimize the use of renewable energy and the consumption is monitored every month. Sample taken on diesel & electricity consumption 2023 as follows: -</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Diesel Baseline (lt)</th> <th>Diesel Act Usage (lt)</th> <th>Electricity Baseline (kWh)</th> <th>Electricity Act Usage (kWh)</th> </tr> </thead> <tbody> <tr> <td colspan="5" style="text-align: center;">a. Genting Kulai Besar Estate</td> </tr> <tr> <td>Jan</td> <td>5884</td> <td>4744</td> <td>21135</td> <td>26992</td> </tr> <tr> <td>Feb</td> <td>5884</td> <td>5031</td> <td>21135</td> <td>26854</td> </tr> <tr> <td>Mac</td> <td>5884</td> <td>5130</td> <td>21135</td> <td>26413</td> </tr> <tr> <td>Apr</td> <td>5884</td> <td>5116</td> <td>21135</td> <td>27937</td> </tr> <tr> <td>May</td> <td>5884</td> <td>6431</td> <td>21135</td> <td>31064</td> </tr> <tr> <td>Jun</td> <td>5884</td> <td>5728</td> <td>21135</td> <td>30946</td> </tr> <tr> <td>Jul</td> <td>5884</td> <td>5498</td> <td>21135</td> <td>25840</td> </tr> <tr> <td>Aug</td> <td>5884</td> <td>6064</td> <td>21135</td> <td>31177</td> </tr> <tr> <td>Sep</td> <td>5884</td> <td>5402</td> <td>21135</td> <td>29313</td> </tr> <tr> <td>Oct</td> <td>5884</td> <td>6443</td> <td>21135</td> <td>30583</td> </tr> <tr> <td>Nov</td> <td>5884</td> <td>4645</td> <td>21135</td> <td>21333</td> </tr> <tr> <td>Dec</td> <td>5884</td> <td>5525</td> <td>21135</td> <td>30220</td> </tr> </tbody> </table>	Month	Diesel Baseline (lt)	Diesel Act Usage (lt)	Electricity Baseline (kWh)	Electricity Act Usage (kWh)	a. Genting Kulai Besar Estate					Jan	5884	4744	21135	26992	Feb	5884	5031	21135	26854	Mac	5884	5130	21135	26413	Apr	5884	5116	21135	27937	May	5884	6431	21135	31064	Jun	5884	5728	21135	30946	Jul	5884	5498	21135	25840	Aug	5884	6064	21135	31177	Sep	5884	5402	21135	29313	Oct	5884	6443	21135	30583	Nov	5884	4645	21135	21333	Dec	5884	5525	21135	30220	Complied
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings				Compliance	
		b. Getting Tebong Estate					
		Jan	4850	4972	34150		26597
		Feb	4850	5262	34150		27064
		Mac	4850	5143	34150		32230
		Apr	4850	2045	34150		35581
		May	4850	5025	34150		20387
		Jun	4850	5491	34150		35120
		Jul	4850	5507	34150		37006
		Aug	4850	5362	34150		43642
		Sep	4850	4548	34150		37327
		Oct	4850	4770	34150		40864
		Nov	4850	4881	34150		35618
		Dec	4850	4897	34150		38420
		c. Genting Tanah Merah Estate					
		Jan	6680	6643	1400		13486
		Feb	6680	5604	1400		13922
		Mac	6680	5393	1400		13867
		Apr	6680	5199	1400		13469
		May	6680	6341	1400		12218
		Jun	6680	7200	1400		15610
		Jul	6680	6244	1400		15280
		Aug	6680	6243	1400		14200
		Sep	6680	7700	1400		13979
		Oct	6680	8325	1400		14807
		Nov	6680	7205	1400		15922
		Dec	6680	8147	1400		14138

Criterion / Indicator		Assessment Findings	Compliance									
		The estate has established and maintained the records of non-renewable energy in a spreadsheet including the actual usage, estimate, baseline value, and the graph to show the trend of non-renewable energy consumption.										
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	Noticed that the management had incorporated the estimated usage of diesel (including usage by the estate contractor) and electricity in the estate budget to determine the energy efficiency of their operations inclusive of fuel used by contractors, including all transport and machinery operations available in the respective estate yearly budgets.	Complied									
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	At the moment, there is no renewable energy being practiced in Genting Kulai Besar Estate & Genting Tanah Merah Estate. Noticed that 1 1-unit solar panel is used for street lighting at the estate entrance and 1 unit solar panel at the estate's guard house.	Complied									
Criterion 4.5.3: Waste management and disposal												
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	All waste products and sources of pollution are identified in Identification, Segregation, and Storage of Waste dated 16/01/2024. Details as below: - <table border="1" data-bbox="1055 1134 1868 1353"> <thead> <tr> <th>Source of waste</th> <th>Waste Product</th> <th>Storage / handling/ disposal</th> </tr> </thead> <tbody> <tr> <td>Chemical Store</td> <td>Chemical containers</td> <td>Used containers will be sent to empty container store</td> </tr> <tr> <td>Fertilizer store</td> <td>Bags</td> <td>Used bags will be kept at Empty Fertilizer Bag store</td> </tr> </tbody> </table>	Source of waste	Waste Product	Storage / handling/ disposal	Chemical Store	Chemical containers	Used containers will be sent to empty container store	Fertilizer store	Bags	Used bags will be kept at Empty Fertilizer Bag store	Complied
Source of waste	Waste Product	Storage / handling/ disposal										
Chemical Store	Chemical containers	Used containers will be sent to empty container store										
Fertilizer store	Bags	Used bags will be kept at Empty Fertilizer Bag store										

Criterion / Indicator		Assessment Findings			Compliance
		Clinic	Clinical waste	All waste will be dumped into special containers supplied by Kualiti Alam	
		Workshop	Filters	Used filters will be kept at oil strainer tray before transfer to schedule waste store.	
		Scheduled Waste Store	Schedule waste	Stored in designated containers according to the category of wastes.	
		Diesel Tank	Scheduled Waste	Contaminated soil or fiber sent to scheduled waste store	
		Shops	Domestic	Dump in separate containers before sent to land fill/Majlis Daerah/Perbandaran	
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <ul style="list-style-type: none"> a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products <p>- Major compliance -</p>	<p>Sighted that the waste management plan includes;</p> <ul style="list-style-type: none"> a. All waste and pollution are identified and documented in the Identification of Source and Type of Waste Format. Details of the management plan as described below. This is a continuation of the 4.5.3.1 above. b. Waste management plan was established by the estate to include pollution source, management plan, and monitoring plan. For example, source of waste and mitigation plan for scheduled waste, domestic wastes, and recyclable waste. The action plan is as follows: <ul style="list-style-type: none"> i. Disposal as scheduled waste by DOE-approved contractor ii. Disposal of domestic wastes at designated landfill area/ Majlis Daerah/Majlis Perbandaran (Majlis Perbandaran Kulai) 			Complied

Criterion / Indicator		Assessment Findings	Compliance																				
		<p>iii. Segregation of waste and storage at designated recyclable waste area.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Date Updated waste Management Plan</th> </tr> </thead> <tbody> <tr> <td>Genting Kulai Besar Estate</td> <td>16/01/2024</td> </tr> <tr> <td>Genting Tebong Estate</td> <td>04/01/2024</td> </tr> <tr> <td>Genting Tanah Merah Estate</td> <td>05/01/2024</td> </tr> </tbody> </table> <p>The Estate is utilizing EFB as a source to improve the recycling of potential wastes as nutrients. Details are as follows; -</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Hectare</th> <th>Mt</th> </tr> </thead> <tbody> <tr> <td>Genting Kulai Besar Estate</td> <td>148.17</td> <td>7,794.58</td> </tr> <tr> <td>Genting Tebong Estate</td> <td>151.93</td> <td>1,875.10</td> </tr> <tr> <td>Genting Tanah Merah Estate</td> <td>1,620.00</td> <td>41,577</td> </tr> </tbody> </table>	Estate	Date Updated waste Management Plan	Genting Kulai Besar Estate	16/01/2024	Genting Tebong Estate	04/01/2024	Genting Tanah Merah Estate	05/01/2024	Estate	Hectare	Mt	Genting Kulai Besar Estate	148.17	7,794.58	Genting Tebong Estate	151.93	1,875.10	Genting Tanah Merah Estate	1,620.00	41,577	
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4.5.3.3	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>The management has established the Standard Operating Procedure under Sustainability Management Procedure Manual, Scheduled Waste Management, Doc No SMP-GPB-11 Revision 1 Issue date; 05/06/2018, Sustainability Management Procedure Manual, SOPs and Justification of Pesticides Used, Doc No SMP-GPB-28 Revision 5 Issue date; September 2020.</p> <p>Sighted the appointed licensed collector to collect the scheduled wastes at the estate. The latest disposal of scheduled waste for the estate is as follows;</p> <table border="1"> <thead> <tr> <th>SW</th> <th>Waste Name</th> <th>Previous Disposal</th> <th>Date Generated</th> <th>Date Latest Disposed</th> <th>No days from date generated to recent disposed</th> <th>Contractor</th> </tr> </thead> <tbody> <tr> <td colspan="7">a. Genting Kulai Besar Estate</td> </tr> </tbody> </table>	SW	Waste Name	Previous Disposal	Date Generated	Date Latest Disposed	No days from date generated to recent disposed	Contractor	a. Genting Kulai Besar Estate							Complied						
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a. Genting Kulai Besar Estate																							

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings						Compliance	
		408	Soil / dust		27/07/23	24/01/24 3 kg	180	Kualiti Alam Sdn Bhd	
		306	Used hydraulic oil	27/07/23 324 kg	30/07/23	02/01/24 101 kg	180		
		305	Used lubricant oil	27/07/23 203 kg	27/07/23	02/01/24 163 kg	180		
		102	battery		25/07/23	02/01/24 160 kg	180		
		410	PPE	27/07/23 298 kg	02/08/23	07/07/24 192 kg	180		
		b. Genting Tebong Estate							
		306	Used hydraulic oil	17/08/23 324 kg	20/08/23	31/01/24 55 kg	180	Kualiti Alam Sdn Bhd	
		305	Used lubricant oil	17/08/23 203 kg	20/08/23	02/01/24 63 kg	180		
		408	Contaminated soil		27/07/23	24/01/24 3 kg	180		
		410	Used Oil Filter	21/9/23 45 kg	01/08/23	07/7/2024 16 kg	180		
		410	PPE	27/7/23 298 kg	020/8/23	07/7/2024 19 kg	180		
		c. Genting Tanah Merah Estate							
		404	Clinical waste		05/08/23	18/01/24 102 kg	180	Kualiti Alam Sdn Bhd	
		410	Contaminated Oil Filter	21/08/23 95 kg	25/08/23	30/01/24 150kg	180		

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings						Compliance												
		305	Spent lubricant oil	21/08/23 730 kg	30/08/23	30/01/24 950 kg	180													
		110	E-Waste	21/08/23 15kg	27/08/23	30/01/24 23 kg	180													
		408	Contaminated soil	21/08/23 40 kg	30/08/23	30/01/24 50.5 kg	180													
		<p>The site visit to schedule waste store noticed that the stock scheduled items at minimum quantity since the last scheduled disposal was on January 2024. Noticed that the scheduled waste labeling was properly done in accordance with Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974.</p> <p>The site visit to the scheduled waste store at Genting Kulai Besar Estate, Genting Tebong Estate & Genting Tanah Merah Estate, observation of domestic waste disposal via contractor in Genting Kulai Besar Estate, and during the site visit to the landfill in Block 2000A Home Division Genting Tebong Estate & the landfill in Block 96 Genting Tanah Merah Estate confirmed that there is no reoccurrence of the issues concerning scheduled waste management that was highlighted in the Major Non-conformance during last year's audit.</p>																		
4.5.3.4	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p>- Major compliance -</p>	<p>The empty pesticide containers are disposed to Kualiti Alam Sdn Bhd/G-Planter Sdn Bhd, a buyer of triple-rinsed containers. The record of disposal through Kualiti Alam Sdn Bhd/G-Planter Sdn Bhd is as follows: -</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Date</th> <th>Mineral Bottle</th> <th>Empty Chemical</th> </tr> </thead> <tbody> <tr> <td>Genting Kulai Besar Estate</td> <td>24/01/2024</td> <td>-</td> <td>270 kg</td> </tr> <tr> <td>Genting Tebong Estate</td> <td>01/02/2024</td> <td>-</td> <td>60 kg</td> </tr> </tbody> </table>						Estate	Date	Mineral Bottle	Empty Chemical	Genting Kulai Besar Estate	24/01/2024	-	270 kg	Genting Tebong Estate	01/02/2024	-	60 kg	Complied
Estate	Date	Mineral Bottle	Empty Chemical																	
Genting Kulai Besar Estate	24/01/2024	-	270 kg																	
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance				
		<table border="1" style="width: 100%;"> <tr> <td style="width: 30%;">Genting Tanah Merah Estate</td> <td style="width: 15%;">08/01/2024</td> <td style="width: 15%;">-</td> <td style="width: 30%;">320kg</td> </tr> </table> <p>During the site visit to schedule the waste store (empty container) noticed that the empty chemical containers were punched. The empty fertilizer bags were stacked properly.</p>	Genting Tanah Merah Estate	08/01/2024	-	320kg	
Genting Tanah Merah Estate	08/01/2024	-	320kg				
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	<p>Disposal of domestic wastes is guided by the Landfill and Domestic Waste Management procedure [SMP-GPB-12, rev. 01, dated 01/12/2014]. The procedure outlines the criteria to be considered in selecting a landfill area and the method to construct a waste pit.</p> <p>Domestic waste in Genting Kualu Besar Estate is collected twice a week and disposed of by Majlis Perbandaran Kulai.</p> <p>Seen, the landfill in Genting Tebong Estate, Home & Batang Melaka Division was designated at Block 2000A and Genting Tanah Merah Estate at Block 96. The site visit to the landfill found that the landfill was well managed complete with a warning signboard c/w opening and closing of the landfill. The collection from the line site was done 3 times a week by own transportation. Observed that no scheduled waste was dumped into domestic waste bins as well as landfills.</p>	Complied				
Criterion 4.5.4: Reduction of pollution and emission							
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	<p>All polluting activities were identified through the environmental aspect and impact evaluation register which includes all the estate's activities such as FFB harvesting & evacuation, workshop, field maintenance, nursery, replanting, line-site, and administration.</p> <p>Data on the level of Greenhouse gas (GHG) emissions are monitored and compiled yearly through the GHG calculation methodology accepted for RSPO and ISCC GHG calculations and certifications which</p>	Complied				

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings				Compliance																
		are analyzed. Sighted the GHG Calculation for 1/7/2022- 30/6/2023 using GHG RSPO PalmGHG Calculator, V.3.0.1 as below: - <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Estate</th> <th>Total Emission kgCO₂E</th> <th>kgCO₂E/ha</th> <th>kgCO₂E / mt FFB</th> </tr> </thead> <tbody> <tr> <td>Genting Kulai Besar Estate</td> <td>2,094,832</td> <td>737.08</td> <td>95.62</td> </tr> <tr> <td>Genting Tebung Estate</td> <td>3,635,630</td> <td>1,207.95</td> <td>127.08</td> </tr> <tr> <td>Genting Tanah Merah Estate</td> <td>3,016,765</td> <td>1,345.56</td> <td>134.38</td> </tr> </tbody> </table>				Estate	Total Emission kgCO ₂ E	kgCO ₂ E/ha	kgCO ₂ E / mt FFB	Genting Kulai Besar Estate	2,094,832	737.08	95.62	Genting Tebung Estate	3,635,630	1,207.95	127.08	Genting Tanah Merah Estate	3,016,765	1,345.56	134.38	
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4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Sighted Environmental Management Plan (EMP), mitigation measures are identified in the Environment Impacts Assessment register to prevent or minimize pollution. Sample taken as below: - <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Estate</th> <th>Activity</th> <th>Negative Impact</th> <th>Mitigation Plan</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>Genting Kulai Besar Estate</td> <td>Water Pollution – groundwater pollution from waste water, septic tanks</td> <td>Seepage of raw sewage into ground and surface water</td> <td>Regular maintenance of septic tank</td> <td>Surface water quality monitoring</td> </tr> <tr> <td>Genting Tebung Estate</td> <td>Air pollution- Open burning</td> <td>Air pollution</td> <td>Enforce a no burning policy</td> <td>Regular site inspection Site inspection report</td> </tr> </tbody> </table>				Estate	Activity	Negative Impact	Mitigation Plan	Action Plan	Genting Kulai Besar Estate	Water Pollution – groundwater pollution from waste water, septic tanks	Seepage of raw sewage into ground and surface water	Regular maintenance of septic tank	Surface water quality monitoring	Genting Tebung Estate	Air pollution- Open burning	Air pollution	Enforce a no burning policy	Regular site inspection Site inspection report	Complied	
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings					Compliance
		Genting Tanah Merah Estate	Waste Management - Domestic & Recycleable waste	pollution	Ensure adequate procedure, waste management plans and implementation are available	Routine Waste collection	
Criterion 4.5.5: Natural water resources							
4.5.5.1	<p>The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate. 	<p>The management has established a water management plan that includes as following;</p> <ul style="list-style-type: none"> a. Water Management Plan has been established with the main objective of maintaining the quality and availability of natural water resources (surface and groundwater). Among the plans established covering: <ul style="list-style-type: none"> a. Water treatment Plan b. Domestic Water c. Water Storage Tank d. Drainage System e. Sewage and Septic Tank f. Assessment of water usage g. Education and training h. Flood Area 					Complied

Criterion / Indicator	Assessment Findings	Compliance																																																										
<p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>	<p>i. Water Quality</p> <p>Sources of domestic water usage in Genting Kulai Besar Estate and Genting Tebong Estate and Genting Tanah Merah Estate are obtained from Syarikat Air Johor (SAJ) and Syarikat Air Melaka Berhad (SAMB) respectively.</p> <p>b. Sighted river water quality analyzed. Details are as follows: -</p> <table border="1" data-bbox="1093 651 1753 1374"> <thead> <tr> <th rowspan="2">Parameter</th> <th colspan="2">Results</th> <th rowspan="2">Standard Limit</th> </tr> <tr> <th>Inlet</th> <th>Outlet</th> </tr> </thead> <tbody> <tr> <td colspan="4">a. Genting Kulai Besar Estate -</td> </tr> <tr> <td>pH</td> <td>5.9</td> <td>6.0</td> <td>5.5 – 9.0</td> </tr> <tr> <td>COD</td> <td>18</td> <td>9</td> <td>200</td> </tr> <tr> <td>BOD</td> <td>5</td> <td>3</td> <td>50</td> </tr> <tr> <td>Suspend Solid</td> <td>23</td> <td>123</td> <td>100</td> </tr> <tr> <td>Dissolved Oxygen</td> <td>Not Detected</td> <td>Not Detected</td> <td>-</td> </tr> <tr> <td>Ammoniacal Nitrogen</td> <td>1.73</td> <td>2.54</td> <td>20</td> </tr> <tr> <td>Phosphorous</td> <td>8.10</td> <td>8.28</td> <td>10</td> </tr> <tr> <td colspan="4">b. Genting Tebong Estate (Home Division)</td> </tr> <tr> <td>pH</td> <td>6.2</td> <td>6.3</td> <td>5.5 – 9.0</td> </tr> <tr> <td>COD</td> <td>19.62</td> <td>15.09</td> <td>200</td> </tr> <tr> <td>BOD</td> <td>1.06</td> <td>1.04</td> <td>50</td> </tr> <tr> <td>Suspend Solid</td> <td>6</td> <td>6</td> <td>100</td> </tr> </tbody> </table>	Parameter	Results		Standard Limit	Inlet	Outlet	a. Genting Kulai Besar Estate -				pH	5.9	6.0	5.5 – 9.0	COD	18	9	200	BOD	5	3	50	Suspend Solid	23	123	100	Dissolved Oxygen	Not Detected	Not Detected	-	Ammoniacal Nitrogen	1.73	2.54	20	Phosphorous	8.10	8.28	10	b. Genting Tebong Estate (Home Division)				pH	6.2	6.3	5.5 – 9.0	COD	19.62	15.09	200	BOD	1.06	1.04	50	Suspend Solid	6	6	100	
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**MSPO Public Summary Report
Revision 2 (Nov 2021)**

Criterion / Indicator		Assessment Findings				Compliance
		Dissolved Oxygen	10	9	-	
		Ammoniacal Nitrogen	0.6	0.6	20	
		Phosphorous	0.01	0.01	10	
		c. Genting Tanah Merah Estate				
		pH	4.8	4.7	5.5 – 9.0	
		COD	150	151	200	
		BOD	1.4	19.8	50	
		Suspend Solid	12	8	100	
		Dissolved Oxygen	9	10	-	
		Ammoniacal Nitrogen	1.1	0.8	20	
		Phosphorous	-	-	10	
		<p>c. Management has established Water Management to optimize water and nutrient usage to reduce wastage by monitoring pipe leakages and installing rain gutter to collect rainwater. The water trap at chemical mixing station established to trap chemical solution spillages reuse it for chemical mixing process. The regular monitoring of water usage is verified.</p> <p>d. Protection of Steep Slopes Management is guided by its established procedure of Sustainability Management Procedure Manual, Doc No SMP-GPB-10 Revision 02 Issue Date 18/03/2021 and Protection of Water Course through Sustainability Management Procedure Manual, Doc No SMP-GPB-14 Revision 02 Issue Date 20/01/2021</p> <p>The buffer zone area was demarcated with red color at the palm. Signboards on prohibition of chemical application were erected at</p>				

Criterion / Indicator		Assessment Findings	Compliance
		<p>the buffer zone area and no trace of agrochemical usage was observed.</p> <p>e. The site visit to the buffer zone area found no indication of natural vegetation removal in riparian areas.</p> <p>The site visit observation and interview with employee found that no utilization of tube well/bore well in the estate.</p>	
4.5.5.2	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p>- Minor compliance -</p>	<p>Walkabout in the field during the site visit confirmed that no construction of bunds, weirs, and dams across the river and natural water streams in the estate. Noticed that the inlet & outlet water pond nursery Genting Tanah Merah Estate keeps flowing from and to the water stream.</p>	Complied
4.5.5.3	<p>Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).</p> <p>- Minor compliance -</p>	<p>The estate has practice water harvesting incorporated in the estate infra development and their Good Agriculture Practices (GAP). Observed that the field road has developed with cambering and roadside drain on both sides to channel in the rainwater into palm planting row. In the slop area palms were planted on the planting terrace with sufficient terrace backdrop to retain water. The cut frond was stacked on a palm row in every 2 palm rows in a flat area and broadly stacked at the edge of the planting terrace to conserve the rainwater run-off. Noticed that rainwater harvesting using a rain gutter is practiced at a workshop in Genting Tanah Merah Estate.</p>	Complied
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			
4.5.6.1	<p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p>	<p>The High Conservation Value (HCV) & Conservation Area Assessment And Management Action Plans are available for Auditor verification. The assessment namely, "Inventory On HCV sites within Genting</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance																
<p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</p> <p>- Major compliance -</p>	<p>Plantations Bhd Group Of Estate (Southern Region)" by Dr xxx from xxx xxx Advisory Services dated February 2010.</p> <p>a. Based on the above study, listed below the HCV being identified:</p> <table border="1" data-bbox="1093 544 1868 932"> <thead> <tr> <th>Estate</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Genting Kulai Besar Estate</td> <td>1. Forest areas containing globally, regionally or nationally significant concentration of biodiversity value</td> </tr> <tr> <td>Genting Tebong Estate</td> <td>1. Ponds 2. Steep Terrain 3. Temple 4. Cemetery</td> </tr> <tr> <td>Genting Tanaj Merah Estate</td> <td>1. The Ficus trees 2. Old Teak Plot 3. Temple</td> </tr> </tbody> </table> <p>b. Conservation status;</p> <table border="1" data-bbox="1093 1023 1868 1370"> <thead> <tr> <th>Estate</th> <th>HCV</th> <th>Management Measures</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>Genting Kulai Besar Estate</td> <td>1. Forest areas containing globally, regionally or nationally significant concentrati</td> <td>Road and tranches along the forest boundary, warning signboards (No Fishing, No Trapping, No Hunting & No Trespassing).</td> <td>On-going</td> </tr> </tbody> </table>	Estate	HCV	Genting Kulai Besar Estate	1. Forest areas containing globally, regionally or nationally significant concentration of biodiversity value	Genting Tebong Estate	1. Ponds 2. Steep Terrain 3. Temple 4. Cemetery	Genting Tanaj Merah Estate	1. The Ficus trees 2. Old Teak Plot 3. Temple	Estate	HCV	Management Measures	Status	Genting Kulai Besar Estate	1. Forest areas containing globally, regionally or nationally significant concentrati	Road and tranches along the forest boundary, warning signboards (No Fishing, No Trapping, No Hunting & No Trespassing).	On-going	
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Criterion / Indicator		Assessment Findings				Compliance
			on of biodiversity value			
		Genting Tebong Estate	<ol style="list-style-type: none"> 1. Ponds 2. Steep Terrain 3. Tample 4. Cemetery 	Protection of the residual pond with signage and demarcation. Establish appropriate riparian buffer belts in accordance with company on buffer zone. Protect the residual steep terrain and prevent any poaching. Protection of the Tample area. Protection of the Cemetery area.	On-going	
		Genting Tanah Merah Estate	<ol style="list-style-type: none"> 1. The Ficus trees 2. Old Teak Plot 3. Tample 	Place clear boundary on the Ficus sport. Protect the residual area from encroachment.	On-going	
4.5.6.2	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include: <ol style="list-style-type: none"> a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to 	The management and monitoring plan for HCV areas was established and reviewed annually. There were displays of signage made at the site; <ol style="list-style-type: none"> a. No fishing, no manuring/ no spraying b. No spraying/ no hunting/ no swimming c. Muslim & Christian cemetery signage 				Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	<p>resolve human-wildlife conflicts.</p> <p>- Major compliance -</p>	<p>There were programs held by the estates for all employees on the awareness of HCV areas and RTE species. Interviews with the employees concluded that training and briefing were made during the ad-hoc session and morning muster. Employees are aware of the following reminders:</p> <ol style="list-style-type: none"> 1. An offense to capture, harm, or kill any wildlife 2. Disciplinary measures shall be taken if found violating company rules 3. Riparian buffer zone to be free from any chemicals application/pollution 4. Relevant signs NO HUNTING NO FELLING ALLOWED 	
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>The Management Plan was established with the implementation of monitoring/observation of buffer zones and wildlife. The monitoring records are maintained:</p> <ol style="list-style-type: none"> a. Monitoring of Wildlife record b. Monitoring of Buffer Zone record <p>The latest appearance of endangered species recorded in the wildlife record Genting Kulai Besar Estate was a wild Boer & Long-Tailed Macaque dated 13/8/2023 at 10:00 am. In Genting Tanah Merah Estate appearance of an endangered species was Sus csrofa 7 Python reticulates on 25/10/2023.</p>	Complied
Criterion 4.5.7: Zero burning practices			
4.5.7.1	<p>Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.</p>	<p>In the sampled estates, there has been no land preparation through burning since Genting Plantations adopted the Zero Burning Policy.</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>This policy, dated 10/8/11 and signed by the President & Chief Operating Officer, emphasizes:</p> <ul style="list-style-type: none"> a) Prohibition of any open burning in all Operating Units (OU). b) Proper disposal of all types of waste products. c) Limited allowance of open burning only for cooking and religious purposes, under appropriate supervision. <p>During the audit visits, it was observed that in replant areas, all palms were felled, shredded, windrowed, and left to decompose, aligning with the practice of zero burning as per the established policy.</p>	
4.5.7.2	<p>A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop.</p> <p>- Major compliance -</p>	<p>There is no land preparation by means of burning at both the estates. This is confirmed through observation during the field visits and interview with the workers.</p>	N/A
4.5.7.3	<p>Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws.</p> <p>- Major compliance -</p>	<p>There is no land preparation by means of burning at both the estates. This is confirmed through observation during the field visits and interview with the workers.</p>	N/A
4.5.7.4	<p>Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.</p> <p>- Minor compliance -</p>	<p>The practice of zero burning during land preparation for replanting is explicitly included in the specification of work orders. This practice is considered a standard within the Genting Group and the industry as a whole. However, variations in practices are noted between inland and coastal estates.</p> <p>In specific conditions, for example, in certain coastal estates, trunks are felled and chipped without the need for shredding and windrowing.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Any necessary adjustments to the work process are finalized based on directives from the Regional Office or Head Office, allowing for flexibility and adaptation to different estate conditions.	
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	<p>Genting Plantations Berhad has established standard operating procedures to be adopted by the estates under Genting groups. Estates' operations are governed by two documented procedures as follows:</p> <ul style="list-style-type: none"> • Oil Palm Manual dated June 2013; and • SOP for the estate management and operations dated January 2011. <p>The above documented procedures are found covered best management practices at all operation's processes. It is observed that, in terms of practice, every estate's operation also make reference to the Genting Peninsular Malaysia Estates Standard Operating Procedure (SOP) (Revision 2 – December 2010), which cover more on safety aspects.</p> <p>In practice, daily muster chit form is used for work planning at all sampled estates, which is prepared by field conductor, verified by assistant manager, and approved by estate manager. Based on the interview with estate managers, all activities will be monitored by field supervisor / mandore to ensure all activities are conducted as per plan. Daily work progress for major works such as harvesting, spraying, and manuring of all sampled estates is made available during the audit. The work progress is recorded on daily basis for every work gang. The</p>	Minor Non Compliance

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>record which is reviewed by assistant and estate manager on daily and monthly basis.</p> <p><u>Genting Kulai Besar Estate</u></p> <p>Observed strip spraying activity at field P20 and it is confirmed that the activity was conducted according to the procedure established. An interview with the workers has confirmed that the workers were informed and trained to carry out strip spray. The audit team also found that the workers are able to demonstrate their understanding on safety and health and also the process of strip spraying including type of chemical use (i.e., <i>glyphosate, ally and amine</i>), premix chemical, preparation of tools, techniques of strip spray, etc. as verified during interview with the workers. Signboard for date allow to entering spraying area were sighted during site visit. Besides that, it was found that a few estate operations implemented mechanisation for field grass cutting and FFB evacuation activities by using rotoslasher and grabber mini tractor.</p> <p><u>Genting Tebong Estate</u></p> <p>Observed harvesting operation and FFB evacuation using grabber mini tractor at field 01C. All workers involved were trained by the estate management before carry out the work assigned and harvester is strictly follow minimum ripeness standard which is harvest bunches with 5 loose fruits on the ground as verified during interview with harvester.</p> <p><u>Genting Tanah Merah Estate</u></p> <p>Observed manuring application for fertiliser Compund 55 at field 21B with dosage 1.50 kg/palm. All workers involved has been trained by the estate management before carried out work assigned to them as verified during interview with the workers. It was also found that their</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>understanding for the job assigned is aligned with the company's Oil Palm Manual.</p> <p>Despite the above, verification during site visit at Genting Tebong Estate found that welding rod is kept in the workshop store. However, there is no safety data sheet for welding rod at workshop store which is against section 5.9 <i>Pematuhan Helaian Data Keselamatan (SDS – Safety Data Sheet)</i> under Safe Operating Procedure (Doc. No.: OM-GPB-15; Revision No.: 00; Issue date: 28/07/2022) whereby stated that <i>Helaian Data Keselamatan (SDS) hendaklah disimpan ditempat mudah dilihat dimana bahan kimia berbahaya itu diguna dan hendaklah mudah diperolehi oleh pekerja.</i></p> <p>While for Genting Tanah Merah Estate, safety data sheet (SDS) is made available in the chemical, fertiliser, and workshop store. However, it was found that SDS for Basta SL 150 and Stainarc 310-16 (welding rod) is only available in English version at the chemical and workshop store. This is not followed section 5.3 under Safe Operating Procedure (Doc. No.: OM-GPB-15; Revision No.: 00; Issue date: 28/07/2022) where stated that <i>Helaian Data Keselamatan (SDS) hendaklah ditulis dalam bahasa kebangsaan dan bahasa English.</i> Therefore, Minor NC was raised against this indicator.</p>	
4.6.1.2	<p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p>- Major compliance -</p>	<p>Generally, all estates adopted to Genting Plantations Berhad's Sustainability Management Procedure Manual - Steep Land Management (Doc. Ref.: SMP-GPB-10; Rev 02; dated 18/03/2021). The practice with regards to steep area as follows:</p> <ul style="list-style-type: none"> • 7.1 No new planting at Steep Slopes <ul style="list-style-type: none"> a. Steep slopes above 25 degrees shall not be developed for oil palm. b. Existing crop and vegetation should be conserved accordingly. 	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Planting of timber or other tree species can be considered according to prevailing company policy.</p> <ul style="list-style-type: none"> • 7.2 Replanting at Steep Slopes <ul style="list-style-type: none"> • Prior to replanting, estate to show map of slope terrains and identify contiguous area of steep terrain above 25 degrees. Contiguous area greater than 25 hectares shall not be replanted. • For Sabah, slopes 25 degree and steeper are considered high risk erosion areas and cannot undergo replanting unless approved by Environmental Protection Department (EPD). <p><u>Genting Kulai Besar Estate</u> The terrain of the estate is flat to undulating area. It was observed during field visits that there was no planting at slopes of greater than 25°. Appropriate soil conservation measures such as good ground cover been implemented. Vigorous legume cover crop growth was sighted in all field especially in young immature area as verified during site visit. Proper perpendicular frond stacking between interrow of palms at the undulating area and frond stacking at banks of steep ravine area has been practices by the estate management to minimize surface run-off. Minimal surface run-off was observed throughout the estate. No evidence of blanket spray observed during field tour.</p> <p><u>Genting Tebong Estate and Genting Tanah Merah Estate</u> The estates located on flat to undulating area. Observed throughout the estate that good ground cover dominated with soft grasses is maintained to minimize soil erosion and keep soil moisture. Appropriate soil conservation measures such as proper perpendicular frond stacking between interrow of palms at the undulating area to minimize surface run-off. Water management were in practice such</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		as silt pit constructed. No chemical activities near to the drain practices by estates as verified during site visit. Minimal surface run-off was observed throughout the estate. For young mature and immature field, observed legume cover crop such as <i>mucuna bracteata</i> were planted to maintain soil moisture and avoid the erosion in the field.	
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	All visited estate has established visual identification for each field. Observed throughout the estate such as signage shows as below: <ul style="list-style-type: none"> - Field: PH1B - Block No.: OP2017A - Ha: 45.08 - Date commences: 1 August 2017 - Planting material: GH 500 Block name be given based on Block Number and Year of Planting/Replanting. Block map is made available during the audit.	Complied
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	The audited estates share a similar budget format. This includes a 4-year budget/forecast financial plan covering the period 2025 - 2028. The allocation categories encompass various aspects: a) Hectarage statement <ul style="list-style-type: none"> - Oil Palm - Total Planted Area - Title Area - Replanting Area (Ha) - Replanting Expenditure (RM) 	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																													
		b) Ex Estate Cost c) Crop Production d) Yield Per Ha e) Capital Expenditure (RM)																														
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance -	The replanting programs for the estates are compiled and reviewed on an annual basis, with the possibility of amendments. The sizes of fields identified for replanting vary based on factors such as terrain, yield, etc. The Head Office monitors all replanting programs and planning across the Group Estates. The General Manager (GM) provides assistance and conducts visits to approve hectares, stands per hectare, and other relevant details. <table border="1" data-bbox="1048 836 1868 1102"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="5">Replanting Hectarage, Ha</th> </tr> <tr> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> <th>2028</th> </tr> </thead> <tbody> <tr> <td>Genting Kulai Besar Estate</td> <td>0.00</td> <td>84.86</td> <td>94.94</td> <td>107.72</td> <td>0.00</td> </tr> <tr> <td>Genting Tebong Estate</td> <td>122.79</td> <td>148.48</td> <td>148.69</td> <td>178.19</td> <td>242.03</td> </tr> <tr> <td>Genting Tanah Merah Estate</td> <td>138.20</td> <td>108.76</td> <td>81.29</td> <td>281.09</td> <td>71.03</td> </tr> </tbody> </table>	Estate	Replanting Hectarage, Ha					2024	2025	2026	2027	2028	Genting Kulai Besar Estate	0.00	84.86	94.94	107.72	0.00	Genting Tebong Estate	122.79	148.48	148.69	178.19	242.03	Genting Tanah Merah Estate	138.20	108.76	81.29	281.09	71.03	Complied
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4.6.2.3	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast	The audited estates share a similar budget format. This includes a 4-year budget/forecast financial plan covering the period 2025 - 2028. The allocation categories encompass various aspects: a) Hectarage statement <ul style="list-style-type: none"> - Oil Palm - Total Planted Area - Title Area 	Complied																													

Criterion / Indicator		Assessment Findings	Compliance
	<p>e) Financial indicators: cost benefit, discounted cash flow, return on investment</p> <p>- Major compliance -</p>	<ul style="list-style-type: none"> - Replanting Area (Ha) - Replanting Expenditure (RM) b) Ex Estate Cost c) Crop Production d) Yield Per Ha e) Capital Expenditure (RM) 	
4.6.2.4	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p> <p>- Major compliance -</p>	<p>The estates' performance is documented in the monthly progress report, which includes details on the actual versus budget figures, such as crop production, fixed costs, and direct costs.</p> <ul style="list-style-type: none"> a) Additionally, the management provides a variance report on the performance, which is reviewed monthly. b) Supervisory personnel maintain daily cost records for field operations, ensuring a detailed account of expenses. c) Regional meetings involving Managers take place monthly with the Head Office and higher management for a comprehensive performance review, enhancing coordination and communication across the organization. <p>Sample of visit report as below:</p> <p><u>Genting Tebong Estate</u></p> <ol style="list-style-type: none"> 1. Advisory and RIA visit dated 09/10/2023 2. Agronomist Visit dated 27/01/2023 & 02/02/2023 <p><u>Genting Tanah Merah Estate</u></p> <ol style="list-style-type: none"> 1. Advisory & RIA Visit dated 27/09/2023 <p><u>Genting Kulai Besar Estate</u></p> <ol style="list-style-type: none"> 1. Agronomist Visit dated 15-16/02/2023 	Complied

Criterion / Indicator		Assessment Findings	Compliance																										
		2. Advisory & RIA Visit dated 24/07/2023																											
Criterion 4.6.3: Transparent and fair price dealing																													
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	The management has engaged contractor and they are understanding the MSPO requirements. The management also provided the required documentation and information to contractor. Meanwhile the contractor also has signed contract agreement. Refer also in the contract agreement it was stated the term and condition for contractor including the price agreed. Sighted the evidence. Detail information on the contractor agreement: <table border="1"> <tr><td>Estate</td><td>Genting Kulai Besar Estate</td></tr> <tr><td>Document</td><td>Contract Agreement</td></tr> <tr><td>Date</td><td>01/07/2023</td></tr> <tr><td>Scope of work</td><td>Transport</td></tr> <tr><td>Reference</td><td>GKBE/GSEC-GWO/06(23)</td></tr> <tr><td>Price Mechanism</td><td>Available state in Contract Agreement RM4X.XX/MT FFB</td></tr> </table> Detail information on the contractor agreement: <table border="1"> <tr><td>Estate</td><td>Genting Tebong Estate</td></tr> <tr><td>Document</td><td>Contract Agreement</td></tr> <tr><td>Date</td><td>01/01/2023</td></tr> <tr><td>Scope of work</td><td>Transport</td></tr> <tr><td>Reference</td><td>GTBE/TD/TPT/24/01/08MJ</td></tr> <tr><td>Price Mechanism</td><td>Available state in Contract Agreement RM4X.XX/MT FFB</td></tr> </table> Detail information on the contractor agreement: <table border="1"> <tr><td>Estate</td><td>Genting Tanah Merah Estate</td></tr> </table>	Estate	Genting Kulai Besar Estate	Document	Contract Agreement	Date	01/07/2023	Scope of work	Transport	Reference	GKBE/GSEC-GWO/06(23)	Price Mechanism	Available state in Contract Agreement RM4X.XX/MT FFB	Estate	Genting Tebong Estate	Document	Contract Agreement	Date	01/01/2023	Scope of work	Transport	Reference	GTBE/TD/TPT/24/01/08MJ	Price Mechanism	Available state in Contract Agreement RM4X.XX/MT FFB	Estate	Genting Tanah Merah Estate	Complied
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance																		
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4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>The management has engaged contractor and they are understanding the MSPO requirements. The management also provided the required documentation and information to contractor. The contractor also has signed contract agreement. Refer also in the contract agreement it was stated the term and condition for contractor including the price agreed. Sighted the evidence.</p> <p>Detail information on the payment to contractor:</p> <table border="1"> <tr><td>Estate</td><td>Genting Kulai Besar Estate</td></tr> <tr><td>Document</td><td>Contract Agreement</td></tr> <tr><td>Between</td><td>Contractor & Estate</td></tr> <tr><td>Scope of work</td><td>Transport</td></tr> <tr><td>Reference</td><td>GKBE/GSEC-GWO/06(23)</td></tr> <tr><td>Invoice Date</td><td>10/01/2024</td></tr> <tr><td>Payment Date</td><td>15/01/2024 – Done Paid</td></tr> </table> <p>Detail information on the payment to contractor:</p> <table border="1"> <tr><td>Estate</td><td>Genting Kulai Besar Estate</td></tr> <tr><td>Document</td><td>Contract Agreement</td></tr> </table>	Estate	Genting Kulai Besar Estate	Document	Contract Agreement	Between	Contractor & Estate	Scope of work	Transport	Reference	GKBE/GSEC-GWO/06(23)	Invoice Date	10/01/2024	Payment Date	15/01/2024 – Done Paid	Estate	Genting Kulai Besar Estate	Document	Contract Agreement		Complied
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance
		Between	Contractor & Estate	
		Scope of work	Transport	
		Reference	GTBE/TD/TPT/24/01/08MJ	
		Invoice Date	31/12/2023	
		Payment Date	15/01/2024 – Done Paid	
		Detail information on the payment to contractor:		
		Estate	Genting Tanah Merah Estate	
		Document	Contract Agreement	
		Between	Contractor & Estate	
		Scope of work	Transport	
		Reference	GTME/TF23/02MJ	
		Invoice Date	31/12/2023	
		Payment Date	15/01/2024 – Done Paid	
Criterion 4.6.4: Contractor				
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	All contractors have been briefed on the MSPO requirements, with the management providing necessary documentation and information. Furthermore, the management has conducted training sessions for contractors to familiarize them with the rules of operations within the estate. This is to ensure that contractors are well-informed and compliant with MSPO standards, promoting sustainable practices across the organization's operations. Sighted the evidence: Detail information on the training to contractor:		Complied
		Genting Kulai Besar Estate	Training to contractor has done conducted on 05/09/2023	
		Genting Tebong Estate	Training to contractor has done conducted on 12/12/2023	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance																								
		Genting Tanah Merah Estate	Training to contractor has done conducted on 08/01/2024																									
		Training to contractor has done conducted and the explanation regarding on company policies, contract agreement, pay slip, requirement MSPO/RSPO, safety & environment.																										
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	<p>The management has engaged contractor and they are understanding the MSPO requirements. The management also provided the required documentation and information to contractor. Meanwhile the contractor also has signed contract agreement. Refer also in the contract agreement it was stated the term and condition for contractor including the price agreed. Sighted the evidence.</p> <p>Detail information on the contractor agreement:</p> <table border="1"> <tr> <td>Document</td> <td>Contract Agreement</td> </tr> <tr> <td>Between</td> <td>Contractor & Estate</td> </tr> <tr> <td>Scope of work</td> <td>Transport</td> </tr> <tr> <td>Reference</td> <td>GKBE/GSEC-GWO/06(23)</td> </tr> <tr> <td>Price Mechanism</td> <td>Available state in Contract Agreement</td> </tr> <tr> <td>Term & Condition</td> <td>Available state in Contract Agreement</td> </tr> </table> <p>Detail information on the contractor agreement:</p> <table border="1"> <tr> <td>Document</td> <td>Genting Tebong Estate</td> </tr> <tr> <td>Between</td> <td>Contractor & Estate</td> </tr> <tr> <td>Scope of work</td> <td>Transport</td> </tr> <tr> <td>Reference</td> <td>GTBE/TD/TPT/24/01/08MJ</td> </tr> <tr> <td>Price Mechanism</td> <td>Available state in Contract Agreement</td> </tr> <tr> <td>Term & Condition</td> <td>Available state in Contract Agreement</td> </tr> </table>		Document	Contract Agreement	Between	Contractor & Estate	Scope of work	Transport	Reference	GKBE/GSEC-GWO/06(23)	Price Mechanism	Available state in Contract Agreement	Term & Condition	Available state in Contract Agreement	Document	Genting Tebong Estate	Between	Contractor & Estate	Scope of work	Transport	Reference	GTBE/TD/TPT/24/01/08MJ	Price Mechanism	Available state in Contract Agreement	Term & Condition	Available state in Contract Agreement	Complied
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Criterion / Indicator		Assessment Findings	Compliance						
		Based on interview with the contractor, they are understanding on the term and condition in the contract agreement and there is No issue on outstanding payment where is the payment is timely paid.							
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	<p>The management has accepted MSPO approved auditors to verify assessments through a physical inspection if required. During audit, the management had arranged the invitation stakeholder meeting which is the audit team will do a stakeholder meeting. During audit there is discussion and receiving data collection from the contractor. Sighted the evidence:</p> <p>Detail information on stakeholder consultation during audit:</p> <table border="1"> <tr> <td>Genting Kulai Besar Estate</td> <td>FFB Transporter & JCB Contractor</td> </tr> <tr> <td>Genting Tebong Estate</td> <td>FFB Transporter</td> </tr> <tr> <td>Genting Tanah Merah Estate</td> <td>FFB Transporter</td> </tr> </table>	Genting Kulai Besar Estate	FFB Transporter & JCB Contractor	Genting Tebong Estate	FFB Transporter	Genting Tanah Merah Estate	FFB Transporter	Complied
Genting Kulai Besar Estate	FFB Transporter & JCB Contractor								
Genting Tebong Estate	FFB Transporter								
Genting Tanah Merah Estate	FFB Transporter								
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	<p>The management has observed the contractor job or task before made any payment to them. The monitoring done by checking the site of work, checking the data collection of FFB weighing, checking schedule of work and checking the invoice. Sighted the evidence:</p> <p>Detail information on documents checking before payment:</p> <table border="1"> <tr> <td>Document Checking 1</td> <td>Site work by observation and taking a photo</td> </tr> <tr> <td>Document Checking 2</td> <td>Schedule of work completed by checking the figure, task completion</td> </tr> <tr> <td>Document Checking 3</td> <td>FFB weighbridge ticket monitoring figure of FFB tonnage</td> </tr> </table>	Document Checking 1	Site work by observation and taking a photo	Document Checking 2	Schedule of work completed by checking the figure, task completion	Document Checking 3	FFB weighbridge ticket monitoring figure of FFB tonnage	Complied
Document Checking 1	Site work by observation and taking a photo								
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4.7 Principle 7: Development of new planting									

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.7.1: High biodiversity value			
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia’s National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance -	Not Applicable, there are no new planting available.	N/A
Criterion 4.7.2: Peat Land			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	Not Applicable, there are no new planting available.	N/A
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	Not Applicable, there are no new planting available.	N/A

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -	Not Applicable, there are no new planting available.	N/A
Criterion 4.7.4: Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	Not Applicable, there are no new planting available.	N/A

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	Not Applicable, there are no new planting available.	N/A
Criterion 4.7.6: Customary land			
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites.	Not Applicable, there are no new planting available.	N/A

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	Not Applicable, there are no new planting available.	N/A

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

Criterion / Indicator		Assessment Findings	Compliance						
4.1 Principle 1: Management commitment & responsibility									
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy									
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	Genting Plantations Berhad made a policy on sustainable practices, signed by the President and COO, Mr. Yong Chee Kong, on 01/07/2015. The policy shows a commitment to three main things: taking care of people, the environment, and making a profit. The management aims to have a good system for sustainability and follow the rules of MSPO and MPOB codes. Employees were told about this policy through training and briefings, and it's displayed in important places. Training record as below: Genting Air Item Oil Mill: 02/01/2023 & 07/11/2023	Complied						
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	The MSPO policy says that the management is dedicated to regularly reviewing and creating new and clever ways, methods, and practices. This is all aimed at getting better and better in our efforts to produce sustainable palm oil.	Complied						
Criterion 4.1.2 – Internal Audit									
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Genting Plantations Berhad has set up Standard Operating Procedures (SOP) for Sustainability Internal Audit, detailed in the Sustainability Management Procedure Manual (SMP-GPB-03, rev. 05 dated 09/2020). The headquarters planned and carried out an internal audit. Internal audit record as below: <table border="1" data-bbox="1086 1332 1870 1362"> <thead> <tr> <th>Estate</th> <th>Date</th> <th>Findings</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Estate	Date	Findings				Complied
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**MSPO Public Summary Report
Revision 2 (Nov 2021)**

Criterion / Indicator		Assessment Findings		Compliance	
		Genting Air Item Oil Mill	5-6/12/2023	2 Major NC	
		The results of these internal audits for all operating units are documented in the "RSPO, MSPO & ISCC Internal Audit Report" and are accessible for each operating unit.			
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Genting Plantations Berhad has created a set of guidelines called the Standard Operating Procedures (SOP) for Sustainability Internal Audit. These guidelines are documented in the Sustainability Management Procedure Manual under the section titled "Sustainability Internal Audit," with document number SMP-GPB-03, revised version 05, dated 09/2020. The root cause, correction and corrective action has been documented for each NC raised.			Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The results of internal audits for all operating units have been recorded in a document titled "RSPO, MSPO & ISCC Internal Audit Report." This report is accessible and available for each operating unit.			Complied
Criterion 4.1.3 – Management Review					
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	Management review has been done for all operating units under Southern Region on 22/01/2024 at Genting Sri Gading Estate. Agenda that has been discussed during the meeting any previous or outstanding issues, changes and improvement on sustainability management systems, complaint, and grievances, etc. Meeting minutes was available where the agenda that discussed as below: 1. Minutes / Action Plan of Previous Meeting 2. RSPO, MSPO and ISCC Audit Schedule and certification Status			Complied

Criterion / Indicator		Assessment Findings	Compliance
		3. Changes and improvement on sustainability management system 4. Changes in the system 5. Results of External Audit 6. Result of Internal Audit 7. Organization Performance 8. Complaints and Grievances and Enquiry Register 9. Stakeholder meeting, minutes and complaint and request 10. Greenhouse gases 11. Continual Improvement and recommendation 12. Adequacy of resources 13. Training Requirements 14. Sustainability policies 15. Review of effectiveness / the extent in achieving quality, environmental, social, safety and health objectives and Management plans. 16. Compliance to legal requirement 17. SCC and Traceability 18. Preventive and corrective actions 19. Any other matters	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.	The Mill has established a Continual Improvement Plan covering the social, environmental, and opportunities of the Company dated 26/01/2023. The details are as follows: -	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
<p>- Major compliance -</p>	<ul style="list-style-type: none"> a. Environmental Impacts To improve on Environmental aspects and impacts risk assessment and risk control by regular monitoring of water quality. b. Waste Reduction Maximizing recycling and minimizing waste or by-product generation through an awareness recycling campaign. c. Pollution and greenhouse gas (GHG) emission To minimize the contaminated discharge to the monsoon drain. d. Encourage optimizing the yield of the supply base To enhance the OER and oil production. e. Social Impacts To improve and maintain the interior and exterior of workers' quarters by carrying out necessary repairs. f. Mill output Mill output such as; EFB, Fibre, bunch ash, boiler ash, decanter cake, POME. g. Water Consumption and water quality Clean water is a scarce resource refer to the water management plan as guidance. h. Energy Consumption To ensure the use of efficient diesel & electricity. i. Training Training Program for relevant personnel involved in the implementation of new technology/techniques. 	

Criterion / Indicator		Assessment Findings	Compliance						
		j. New information, New techniques, New technology To establish a system to improve practices in line with new information and techniques or new industry standards and technology that are available and feasible for adoption.							
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	No new technology at the Mill. The new information and techniques to improve practices are obtained mainly through information from communications with suppliers and being members of associations related to the palm oil industry. Any new information on new technology will be forwarded to the HQ for approval before any implementation.	Complied						
4.2 Principle 2: Transparency									
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements									
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	The management has established a standard operating procedure for communication to ensure an effective communication system with both internal and external stakeholders. Internal communication with stakeholders is facilitated through morning briefings and internal memos, while external stakeholders are engaged through the invitation of stakeholder meetings. This approach system is consistent communication channels with all relevant parties involved in the organization's operations. Sighted the evidence: Detail information on procedure company: <table border="1" data-bbox="1086 1284 1870 1380"> <tr> <td>Document</td> <td>Procedure Request & Response</td> </tr> <tr> <td>Reference</td> <td>SMP-GPB-25</td> </tr> <tr> <td>Date</td> <td>14/08/2014</td> </tr> </table>	Document	Procedure Request & Response	Reference	SMP-GPB-25	Date	14/08/2014	Complied
Document	Procedure Request & Response								
Reference	SMP-GPB-25								
Date	14/08/2014								

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance								
		Revision	00									
		Detail information on communication between stakeholder:										
		Genting Ayer Item Oil Mill	External stakeholder meeting has conducted 14/06/2023 at meeting room									
4.2.1.2	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>The management has established documents that are publicly available, to ensuring that information regarding the Malaysian Sustainable Palm Oil (MSPO) is accessible to all stakeholders and communities in the surrounding area. This transparency initiative aims to raise awareness and ensure that relevant parties are informed about the MSPO standards and the organization's commitment to sustainable practices in the palm oil industry. Sighted the evidence:</p> <p>Detail information on documents publicly:</p> <table border="1"> <thead> <tr> <th>Document</th> <th>Information to Stakeholder</th> </tr> </thead> <tbody> <tr> <td>Policies</td> <td>MSPO Policy Environment Policy Safety & Health Policy Human Right Policy</td> </tr> <tr> <td>Reports</td> <td>EAI Report SIA Report HCV Report Internal & External Audit Report</td> </tr> <tr> <td>Management Plan</td> <td>Pollution Prevention Plan Continual Improvement Plan Safety & Health Plan</td> </tr> </tbody> </table>		Document	Information to Stakeholder	Policies	MSPO Policy Environment Policy Safety & Health Policy Human Right Policy	Reports	EAI Report SIA Report HCV Report Internal & External Audit Report	Management Plan	Pollution Prevention Plan Continual Improvement Plan Safety & Health Plan	Complied
Document	Information to Stakeholder											
Policies	MSPO Policy Environment Policy Safety & Health Policy Human Right Policy											
Reports	EAI Report SIA Report HCV Report Internal & External Audit Report											
Management Plan	Pollution Prevention Plan Continual Improvement Plan Safety & Health Plan											
<p>Criterion 4.2.2 – Transparent method of communication and consultation</p>												

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance								
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	<p>The management had established the standard of procedure for consultation and communication for effective communication system with internal and external stakeholders. For internal stakeholders, the mode of communication is two ways communication, internal memo, notice board, MSPO meeting. This procedure complaint & grievance also was informed to the external stakeholder during stakeholder meeting. Sighted the evidence:</p> <p>Detail information on procedure company:</p> <table border="1"> <tr> <td>Document</td> <td>Procedure Consultation & Communication</td> </tr> <tr> <td>Reference</td> <td>SMP-GPB-17</td> </tr> <tr> <td>Date</td> <td>12/12/2023</td> </tr> <tr> <td>Revision</td> <td>03</td> </tr> </table>	Document	Procedure Consultation & Communication	Reference	SMP-GPB-17	Date	12/12/2023	Revision	03	Complied
Document	Procedure Consultation & Communication										
Reference	SMP-GPB-17										
Date	12/12/2023										
Revision	03										
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	<p>The appointment letter for management official to be responsible for communication and any complaint from stakeholder. This is to ensure the sustainability matters with relevant stakeholders are compiled and recorded. Sighted the evidence:</p> <p>Detail information on Appointment Letter PIC:</p> <table border="1"> <tr> <td>Genting Ayer Item Oil Mill</td> <td>Appointment Letter dated 30/03/2023 and PIC is Manager.</td> </tr> </table>	Genting Ayer Item Oil Mill	Appointment Letter dated 30/03/2023 and PIC is Manager.	Complied						
Genting Ayer Item Oil Mill	Appointment Letter dated 30/03/2023 and PIC is Manager.										
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance -	<p>The management has established the list of stakeholders there were information regarding of name, address, telephone number for contractor, supplier, government agency, industry, head of committee surrounding and schools. Sighted the evidence:</p> <p>Details information on the list of stakeholders:</p> <table border="1"> <tr> <td>Document</td> <td>List of Stakeholder</td> </tr> <tr> <td>Date</td> <td>31/01/2024</td> </tr> </table>	Document	List of Stakeholder	Date	31/01/2024	Complied				
Document	List of Stakeholder										
Date	31/01/2024										

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance		
			<p>Government Agencies Supplier and contractor Neighbour mill and estate Neighbour village and school Transporter Trade Union Embassy foreign workers</p> <p>The management has also done conducted stakeholder meeting and the record of minutes of meeting was recorded. During stakeholder meeting, the discussion is all about introduction of company, awareness on MSPO, explanation of complaint procedure, question and answer. Sighted the evidence: Detail information on communication between stakeholder:</p> <table border="1"> <tr> <td>Genting Ayer Item Oil Mill</td> <td>External stakeholder meeting has conducted 14/06/2023 at meeting room</td> </tr> </table>	Genting Ayer Item Oil Mill	External stakeholder meeting has conducted 14/06/2023 at meeting room	
Genting Ayer Item Oil Mill	External stakeholder meeting has conducted 14/06/2023 at meeting room					
Criterion 4.2.3 – Traceability						
4.2.3.1	<p>The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.</p> <p>- Major compliance -</p>	<p>An established Standard Operating Procedure (SOP) for traceability is documented in Genting Plantations Berhad's Sustainable Management Procedure Manual (SMP-GPB-33), revision 00, dated September 2020. This SOP focuses on Sustainable Supply Chain and Traceability and includes a detailed FFB flow chart from estate harvesting designated blocks to mill weighbridge (tickets). Extracted samples of the weighbridge records are as follows:</p> <p>a) FFB Flow Chart: Describing the journey of Fresh Fruit Bunches (FFB) from estate harvesting designated blocks to the mill weighbridge (tickets). The mill processing records the total FFB</p>		Complied		

Criterion / Indicator		Assessment Findings	Compliance
		<p>processed for the day, along with the storage tank number where it is stored.</p> <p>b) Records Formula: The records include opening FFB balances in ramps and cages, plus the FFB intake from the estates for the day. Subtracting the closing FFB balances provides the total processed. The despatch oil from the storage tank follows a similar formula: opening stock plus production, less the despatch volume, gives a closing stock for the day. All records of Crude Palm Oil (CPO) tank sounding are documented during the two shifts of operations.</p> <p>This comprehensive approach ensures accurate tracking and traceability of FFB throughout the processing stages at the mill.</p>	
4.2.3.2	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p>- Major compliance -</p>	<p>The mill diligently maintains daily production records, adhering to the procedures established by the mill. This includes a systematic FFB flow chart from estate harvesting designated blocks to the mill weighbridge (tickets).</p> <ul style="list-style-type: none"> - The daily production records. - The total FFB processed for the day. - The storage tank number where the FFB is stored. - Opening FFB balances in ramps. - FFB intake from the estates for the day. - Closing FFB balances, which, when subtracted, provide the total processed amount. <p>A similar formula is applied for the despatch of oil from the storage tank: opening stock plus production, minus the despatch volume, results in a closing stock for the day. All records of Crude Palm Oil</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>(CPO) tank sounding are meticulously documented during the two shifts of operations.</p> <p>These records are consolidated in the daily production report, which is authorized by the Mill Manager, ensuring accountability and accuracy in the mill's operational documentation.</p>	
4.2.3.3	<p>The management shall identify and assign suitable employees to implement and maintain the traceability system.</p> <p>- Minor compliance -</p>	<p>The mill has appointed the Senior Assistant Manager as the person responsible for implementing the traceability system. This appointment was formalized through an appointment letter dated 01/07/22, signed by the Mill Manager. The authenticity of this letter has been sighted and verified.</p>	Complied
4.2.3.4	<p>Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.</p> <p>- Major compliance -</p>	<p>The Crude Palm Oil (CPO) and Crude Palm Kernel (CPK) weighbridge ticket/despatch note is generated for all transactions with respective buyers. This set of documents includes various pieces of information. While the specific details may vary, typical information found on these documents may include:</p> <ul style="list-style-type: none"> - Date of transaction - Type and quantity of product (CPO/CPK) - Weighbridge ticket number - Buyer information - Mill details - Gross weight and net weight of the product - Vehicle details (if applicable) - Any additional relevant information specific to the transaction <p>Similar information is likely to be present in dispatches of other mill produce, ensuring a standardized and comprehensive record of transactions with buyers.</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings			Compliance
			Sample 1	Sample 2	
		Product	CPO	PK	
		Date	17/01/2024	14/12/2023	
		Lorry No	NCE30XX	VBL32XX	
		Receipt No	CPO24-00XXX	PKIP23000XXXX	
		Weight	41.62 MT	41.88 MT	
4.3 Principle 3: Compliance to legal requirements					
Criterion 4.3.1 – Regulatory requirements					
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	<p>A mechanism to ensure compliance with legal and other requirements has been documented in the Sustainability Management Procedure Manual SMP-GPB-21: Procedure / System to Track Changes to the Laws and Regulations. The process involves the Legal Department taking responsibility for identifying, managing, updating, and tracking legal requirements, as well as monitoring the status of legal compliance.</p> <p>The procedure includes the following steps:</p> <ul style="list-style-type: none"> • The Legal Department handles the identification, management, updating, and tracking of legal requirements and monitors compliance status. • Subsequently, the estates and mill, where applicable, are notified via email about changes or updates to the Legal Requirements Register (LORR) for implementation. <p>Licenses and permits viewed as compliant by the mill for legislative requirements are among the aspects considered during this process.</p>			Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<ol style="list-style-type: none"> 1. MPOB License #500056704000 valid from 01/12/2024 until 31/01/2025 2. Diesel Permit #PJ001836 valid from 06/12/2021 until 05/12/2024 3. Air Compressor #PMT101855 valid until 06/11/2024 4. Boiler #JH PMD 965 valid until 06/11/2024 5. Jadual Pematuhan #003866 valid from 01/07/2023 until 30/06/2024 6. Competence Person #CePPOME/2322166 to Senior Assistant Manager NRIC 920925-XX-XXXX dated 14/09/2023. 7. Competence Person #CePSWaM/03485 to Mill Manager NRIC 860719-XX-XXXX dated 09/12/2019. 8. Competence Person #Steam Engineer G2 to Mill Manager NRIC 860719-XX-XXXX dated 12/11/2015. 9. Competence Person #NW-SRO-AE-3639-T Authorized Entrant and Standby Person for Confined Space to Assistant Mill Engineer NRIC 940424-XX-XXXX dated 19/11/2023 10. Weighbridge Calibration #D057653 inspected by De Metrology dated 24/07/2024. 	
4.3.1.2	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>The Legal Requirements Register (LRR) encompasses all necessary regulatory obligations and undergoes an annual review. The list of relevant legal and other requirements is available during assessments and is compiled in the Sustainability Management Procedure Manual (SMP-GPB-22), with revision number 12 dated 12/12/2023.</p> <p>The list includes three main sections:</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Environment/Safety & Health/Social • Best practices & other requirements • International Standards Requirement <p>Among the identified applicable laws and regulations relevant to operations are:</p> <ul style="list-style-type: none"> • Worker’s Minimum Standards Housing & Amenities Act, 1990 • Wildlife Conservation Act 2010 • Land Ordinance (Amended Ordinance) • Employment Insurance Scheme Act 2017 • Windfall Profit Levy OP Amendment Order 2021 • Employment (Amendment) Act 2022 • Minimum Wages Order 2022 • Anti Sexual harassment Act 2022 	
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>The Sustainability Department (SD), located at the Head Office in Wisma Genting, is responsible for monitoring changes in the law. This information is then shared with all plantations and mills within the organization. The SD, along with the Senior Vice President (SVP) Processing (Malaysia), ensures that any new Acts and Regulations are communicated to all estates in the group.</p> <p>The process involves:</p> <ul style="list-style-type: none"> • Communicating with the document publisher for updates. • Outlining this mechanism in the procedure. • Periodically updating the legal register. • Communicating any changes in the legal register to the respective regions. 	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance								
		The estates has fully adopted the established Genting Plantations Berhad (GPB) system for identifying, tracking, accessing, and updating legal requirements. This ensures that all relevant legal requirements related to the Malaysian Sustainable Palm Oil (MSPO) are established, implemented, and maintained.									
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - Minor compliance -	The Mill Manager has appointed the Chief Clerk as the Person in Charge (PIC) for updating changes in laws. The respective letter confirming this appointment has been sighted and verified.	Complied								
Criterion 4.3.2 – Lands use rights											
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	The management has ensured that the palm oil mill not diminish the rights of another user. Which is the mill is located in the Genting Sungei Rayat Estate, Sing Mah Division land title under lot no. 2XX and 2XX with land title no. 96XXX The mill complex is 88.7 acres and has been verified based on the estate map. Sighted the evidence: Details information on Land Title: <table border="1" data-bbox="1086 1077 1870 1212"> <tr> <td>Document</td> <td>Geran</td> </tr> <tr> <td>Reference</td> <td>96XXX</td> </tr> <tr> <td>No Lot</td> <td>2XX & 2XX</td> </tr> <tr> <td>Mukim</td> <td>Mukim Machap</td> </tr> </table>	Document	Geran	Reference	96XXX	No Lot	2XX & 2XX	Mukim	Mukim Machap	Complied
Document	Geran										
Reference	96XXX										
No Lot	2XX & 2XX										
Mukim	Mukim Machap										
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	The management has provided the legal ownership actual legal of the land. The land title is documented and keep in the filing. The mill also has paid the quit rent to Pejabat Tanah Negeri Johor. Sighted the evidence: Details information on quit rent paid annually.	Complied								

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance
		Document	Bayaran Cukai Tanah	
		Reference	F0950841	
		Year	2023	
		No Lot	227	
		Payment	Paid – RM6X,XXX	
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The mill is separated through fencing around the vicinity. The reservoirs and effluent ponds are located at a distance from the processing area as larger space is required. The mill is located within Genting Sungai Rayat Estate Sinmah Division company of the same certification unit.		Complied
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	Not applicable as land issues is handled by the Genting Ayer Item Oil Mill.		N/A
Criterion 4.3.3 – Customary rights				
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	Not applicable as land issues is handled by the Genting Ayer Item Oil Mill.		N/A
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	Not applicable as land issues is handled by the Genting Ayer Item Oil Mill.		N/A

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance								
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	Not applicable as land issues is handled by the Genting Ayer Item Oil Mill.	N/A								
4.4 Principle 4: Social responsibility, health, safety and employment condition											
Criterion 4.4.1: Social Impact Assessment (SIA)											
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	The management has identified, and plans are implemented on Social Impact Assessment (SIA) to mitigate the negative impacts and promote the positive ones. Refer Social Impact Assessment (SIA) report, the methodology was done by interview section to local community, interview internal workers and conduct stakeholder meeting. The process of assessment was done through identified stakeholder, social factor, analyse data, meeting, develop and implement action plan. Sighted the evidence: Details information on Social Impact Assessment (SIA): <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Document</td> <td>Social Impact Assessment Report</td> </tr> <tr> <td>Date</td> <td>7 – 8/12/2023</td> </tr> <tr> <td>Report By</td> <td>Sustainability Department</td> </tr> </table> Based on the Social Impact Assessment, the management has developed a mitigation action plan to aimed and promoting positive actions to generate beneficial impacts. This plan likely includes strategies and initiatives designed to address identified social issues, enhance community well-being, and foster sustainable development within the affected areas Details information on social management plan: <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Status</td> <td>Action Plan</td> </tr> </table>	Document	Social Impact Assessment Report	Date	7 – 8/12/2023	Report By	Sustainability Department	Status	Action Plan	Complied
Document	Social Impact Assessment Report										
Date	7 – 8/12/2023										
Report By	Sustainability Department										
Status	Action Plan										

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance						
		Done – completed 14/06/2023	To conduct the meeting with stakeholder once a year							
		Done – completed 14/06/2023	To prepare the invitation letter for stakeholder before meeting							
		Done – completed 03/04/2023	To training complaint & grievance to employee							
		Done – completed 30/10/2023	To conducted meeting for workers committee							
		Done – completed 13/02/2023	To updated contract agreement for worker with national language							
Criterion 4.4.2: Complaints and grievances										
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	<p>The management has established a system for dealing with complaints and grievances. The management also has provided training to the worker regarding of complaint and grievances procedure. Sighted the evidence:</p> <p>Details information on complaint and grievance procedure:</p> <table border="1"> <tr> <td>Document</td> <td>Procedure Complaint & Grievance</td> </tr> <tr> <td>Reference</td> <td>SMP-GPB-19</td> </tr> <tr> <td>Date</td> <td>13/05/2022</td> </tr> </table>		Document	Procedure Complaint & Grievance	Reference	SMP-GPB-19	Date	13/05/2022	Complied
Document	Procedure Complaint & Grievance									
Reference	SMP-GPB-19									
Date	13/05/2022									
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	<p>The management has established system to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. Sighted the evidence:</p> <p>Details information on system of complaint & grievance:</p> <table border="1"> <tr> <td>Complaint Form</td> <td>Display at office</td> </tr> <tr> <td>Complaint Flowchart</td> <td>Display at notice board</td> </tr> <tr> <td>Complaint Box</td> <td>Install at office</td> </tr> </table>		Complaint Form	Display at office	Complaint Flowchart	Display at notice board	Complaint Box	Install at office	Complied
Complaint Form	Display at office									
Complaint Flowchart	Display at notice board									
Complaint Box	Install at office									

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance										
		Online System	Through WhatsApp – Careline											
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	<p>The management has established a complaint form at the premises. The complaint form has been used for employees and stakeholders to make any complaint. Anyone can make any complaint and it was recorded in the complaint form and logbook. Sighted the evidence:</p> <p>Details information on system of complaint & grievance:</p> <table border="1"> <tr> <td>Complaint Form</td> <td>Display at office</td> </tr> <tr> <td>Complaint Flowchart</td> <td>Display at notice board</td> </tr> <tr> <td>Complaint Box</td> <td>Install at office</td> </tr> <tr> <td>Online System</td> <td>Through WhatsApp – Careline</td> </tr> </table>		Complaint Form	Display at office	Complaint Flowchart	Display at notice board	Complaint Box	Install at office	Online System	Through WhatsApp – Careline	Complied		
Complaint Form	Display at office													
Complaint Flowchart	Display at notice board													
Complaint Box	Install at office													
Online System	Through WhatsApp – Careline													
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -	<p>The management has established complaint procedure. Refer complaint procedure upon receipt of grievances, the decision taken to provide a written reply to the employee or stakeholder concerned. The grievance will be acting with immediate superior for the resolution on complaint. Sighted the evidence:</p> <p>Details information sample of complaint & grievance form:</p> <table border="1"> <tr> <td>Genting Ayer Item Oil Mill</td> <td>Complaint received: 20/07/2023 Complaint resolved: 26/07/2023</td> </tr> </table> <p>Details information training on complaint procedure:</p> <table border="1"> <tr> <td>Document</td> <td>Minutes of Meeting Stakeholder</td> </tr> <tr> <td>Date</td> <td>14/06/2023</td> </tr> <tr> <td>Attendance</td> <td>External Stakeholder</td> </tr> <tr> <td>Agenda</td> <td>Explanation on complaint procedure to stakeholder</td> </tr> </table>		Genting Ayer Item Oil Mill	Complaint received: 20/07/2023 Complaint resolved: 26/07/2023	Document	Minutes of Meeting Stakeholder	Date	14/06/2023	Attendance	External Stakeholder	Agenda	Explanation on complaint procedure to stakeholder	Complied
Genting Ayer Item Oil Mill	Complaint received: 20/07/2023 Complaint resolved: 26/07/2023													
Document	Minutes of Meeting Stakeholder													
Date	14/06/2023													
Attendance	External Stakeholder													
Agenda	Explanation on complaint procedure to stakeholder													
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon	Complaints and resolutions for the last 24 months has documented and made available to affected stakeholders upon request. The		Complied										

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance						
	request. - Major compliance -	<p>complaint form was recorded in the office for their monitoring and action taken. Sighted the evidence:</p> <p>Details information sample of complaint & grievance form:</p> <table border="1"> <tr> <td>Complaint Form 1</td> <td>Complaint received: 27/06/2023 Complaint resolved: 22/07/2023</td> </tr> <tr> <td>Complaint Form 2</td> <td>Complaint received: 07/12/2022 Complaint resolved: 08/12/2022</td> </tr> </table>	Complaint Form 1	Complaint received: 27/06/2023 Complaint resolved: 22/07/2023	Complaint Form 2	Complaint received: 07/12/2022 Complaint resolved: 08/12/2022			
Complaint Form 1	Complaint received: 27/06/2023 Complaint resolved: 22/07/2023								
Complaint Form 2	Complaint received: 07/12/2022 Complaint resolved: 08/12/2022								
Criterion 4.4.3: Commitment to contribute to local sustainable development									
4.4.3.1	<p>Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.</p> <p>- Minor compliance -</p>	<p>The management has contributed to local development in consultation with the local communities. There is a record for the CSR programme are made with surrounding community. Sighted the evidence:</p> <p>Details information of CSR from the company:</p> <table border="1"> <tr> <td>CSR 1</td> <td>Donation smart television to SK Seri Maju Jaya on 11/01/2023</td> </tr> <tr> <td>CSR 2</td> <td>Donation office equipment to Balai Polis Ayer Hitam</td> </tr> <tr> <td>CSR 3</td> <td>Donation football equipment to SK Seri Maju Jaya on 07/08/2023</td> </tr> </table>	CSR 1	Donation smart television to SK Seri Maju Jaya on 11/01/2023	CSR 2	Donation office equipment to Balai Polis Ayer Hitam	CSR 3	Donation football equipment to SK Seri Maju Jaya on 07/08/2023	Complied
CSR 1	Donation smart television to SK Seri Maju Jaya on 11/01/2023								
CSR 2	Donation office equipment to Balai Polis Ayer Hitam								
CSR 3	Donation football equipment to SK Seri Maju Jaya on 07/08/2023								
Criterion 4.4.4: Employees safety and health									
4.4.4.1	<p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>The Occupational Safety and Health (OSH) Policy, established and signed by the President and Chief Operating Officer on 01/07/2023, outlines the commitment of the company to provide and maintain a safe and healthy working environment for its employees, contractors, and visitors. The policy has been communicated</p>	Complied						

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>periodically during policy briefings, displayed prominently on notice boards in both English and Bahasa Malaysia, and implemented through OSH activities by on-site Safety Officers. Monitoring of OSH activities is carried out by personnel from the Head Office.</p> <p>To ensure understanding and awareness, employees have been regularly briefed on the OSH policy. The latest briefing, conducted by Mr. P. Sivaji, took place on 02/01/2023 & 07/11/2023, and during interviews with workers and staff on site visits, it was revealed that employees have been briefed and understood the policy. This reflects the company's commitment to prioritizing safety and health in the workplace.</p>	
4.4.4.2	<p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). 	<ul style="list-style-type: none"> a) The safety and health policy have been communicated and implemented. Latest training was conducted on 02/01/2023 & 07/11/2023. b) Risk of all operations has been assessed and documented in the HIRARC with reference number SP-MGR-01-F01-0 Rev 03, Issue date 18/2/2022. There is 41 activities has been discussed in the HIRARC documents. Among the activities verified with HIRARC was Loading Ramp, Steriliser and Boiler. <p>CHRA Assessment has been conducted on 15-26/06/2023 with report reference number JKPP HQ/07/ASS/00/236-2023/004 by QMSPRO Sdn Bhd.</p> <p>Medical surveillance was conducted on voluntary basis as per assessor recommendation on previous report. Latest Medical surveillance conducted on 21/10/2022 until 04/11/2022. Total of 12 workers was examined all results showed all workers were fit to work. Medical check-up has been conducted for Authorized Entry Stand By Person Authorized Gas Tester (AESP & AGT)</p>	Major Non Compliance

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
<p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>dated 03/12/2023 by Poliklinik Intan. Result showed all workers were fit to work.</p> <p>Noise Risk Assessment Report (NRA(J)/21-01/02) conducted o 26-27/1/2021 and 29/1/2021 by Nur Izzati Binti Salleh (HQ/16/PEB/00/158).</p> <p>Audiometric Test has been conducted on Mac 2023 until May 2023. A total of 50 wokers was examined and Result showed 48 workers got Normal result while 2 workers need retest. Re test has been conducted on 17/08/2023.</p> <p>c) Training matrix and training programme were established by the management. Evidence of adequate and appropriate training on safe working practices provided to workers was sighted. The training and awareness programme was base on training need analysis conducted by the management team. Each training already been decide through training needs and plan (refer PM-MGR-05-F01-0) dated 2023. Refer List of training at 4.4.6.1.</p> <p>d) The mill has provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC requirements. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>Workers was not wearing fully PPE.</p> <p>During site visit at Boiler and Crude Oil Tank area, it was found that operators was not wearing earplug as their PPE at each station respectively.</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>It was not in line with NRA Assessment Baseline Section H Recommendation PHP: Recommended PHP with NRR range 25-20, Upgrade awareness and administer its usage onsite.</p> <p>Thus Major NC was raised.</p> <p>e) The following manuals contained SOP for chemical handling and used as a procedure in handling chemicals. SOP (safety working instruction) SOP-PRD-14 dated 30 June 2019, to handle the chemical for water testing must be handle by competent person with proper PPE and the test must be conduct at specific area as per requirement. Both were issued from Head Office and used in all operating units within the Group. SDS were kept in the file and workplace through verification during interview.</p> <p>Chemicals stored in the container without label.</p> <p>During site visit at Ramp area, it was found that chemicals soda was placed in the container without any labelled.</p> <p>During site visit at Temporary Laboratory area, it was found that detergent was stored in container without any labelled.</p> <p>It was not in line with CHRA Recommendation Section 6.2.7 Relabelling OSHA 1994 USECHH Regulations 200 VI sub-Regulation 21.</p> <p>Thus, Major NC was raised</p> <p>f) The responsible person(s) for workers' safety and health was a Mill Manager. OSH Committee has been appointed and this included employer representative and employee representative.</p> <p>g) The management already conducted regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance														
		<p>and welfare are discussed openly. Latest OSH Meeting tabulated in the table below:</p> <table border="1"> <thead> <tr> <th>OSH Meeting 2024</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1st Meeting</td> <td>15/01/2024</td> </tr> <tr> <th>OSH Meeting 2023</th> <th>Date</th> </tr> <tr> <td>4th Meeting</td> <td>20/11/2023</td> </tr> <tr> <td>3rd Meeting</td> <td>24/08/2023</td> </tr> <tr> <td>2nd Meeting</td> <td>19/06/2023</td> </tr> <tr> <td>1st Meeting</td> <td>25/01/2023</td> </tr> </tbody> </table> <p>h) Emergency Response Procedure was established. Refer Doc No: SP-MGR-04 Revision 06 dated 16/10/2023. ERP Evacuation Plan has been placed at the notice board and safety briefing has been given to visitor. Latest ERP Training has been conducted on 01/02/2023 and 24/10/2023.</p> <p>i) First Aiders was present at all mill operations. First Aid equipment has been placed at each worksite. Latest First Aid Training has been conducted on 19-20/12/2022 by CERT Academy. A total of 21 personnel was joined the training.</p> <p>j) JKPP 8 has been submitted on 15/01/2024 with reference number JKPP8/164452/2023. There is 1 accident reported with 144 TLA.</p>	OSH Meeting 2024	Date	1 st Meeting	15/01/2024	OSH Meeting 2023	Date	4 th Meeting	20/11/2023	3 rd Meeting	24/08/2023	2 nd Meeting	19/06/2023	1 st Meeting	25/01/2023	
OSH Meeting 2024	Date																
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3 rd Meeting	24/08/2023																
2 nd Meeting	19/06/2023																
1 st Meeting	25/01/2023																
Criterion 4.4.5: Employment conditions																	
4.4.5.1	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.	The management has established policy on good social practice regarding human rights in respect of industrial harmony in the organisation. The policy has been signed by the top management	Complied														

**MSPO Public Summary Report
Revision 2 (Nov 2021)**

Criterion / Indicator	Assessment Findings	Compliance																
<p>- Major compliance -</p>	<p>and effectively communicated to the employees through muster briefing at field site. Sighted the document as below evidence: Details information of policy of company:</p> <table border="1" data-bbox="1088 544 1865 1198"> <tr> <td>Document</td> <td>Social Policy</td> </tr> <tr> <td>Signed By</td> <td>President & Chief Operating Officer</td> </tr> <tr> <td>Date</td> <td>14/09/2020.</td> </tr> <tr> <td>Content of Policy</td> <td> Respect human rights and support international human rights law. Provide safe and healthy working environment. Respect the right of workers to join or form legal trade unions Not use any child labour. No discrimination in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation. Not commit any physical abuse, threatened, harassment or verbal abuse towards the employees. </td> </tr> </table> <p>Details information of policy has communicated to employee:</p> <table border="1" data-bbox="1088 1246 1865 1380"> <tr> <td>Document</td> <td>Training Record</td> </tr> <tr> <td>Training</td> <td>Training Policies to employee</td> </tr> <tr> <td>Training By</td> <td>Senior Asst Manager</td> </tr> <tr> <td>Date</td> <td>08/01/2024</td> </tr> </table>	Document	Social Policy	Signed By	President & Chief Operating Officer	Date	14/09/2020.	Content of Policy	Respect human rights and support international human rights law. Provide safe and healthy working environment. Respect the right of workers to join or form legal trade unions Not use any child labour. No discrimination in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation. Not commit any physical abuse, threatened, harassment or verbal abuse towards the employees.	Document	Training Record	Training	Training Policies to employee	Training By	Senior Asst Manager	Date	08/01/2024	
Document	Social Policy																	
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance								
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>The management has established policy that provided equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin to all employees. This policy has effectively communicated to employee through muster briefing and training session. Sighted the evidence:</p> <p>Details information of policy of company:</p> <table border="1"> <tr> <td>Document</td> <td>Social Policy</td> </tr> <tr> <td>Signed By</td> <td>President & Chief Operating Officer</td> </tr> <tr> <td>Date</td> <td>14/09/2020.</td> </tr> <tr> <td>Content of Policy</td> <td> <p>Respect human rights and support international human rights law. Provide safe and healthy working environment. Respect the right of workers to join or form legal trade unions. Not use any child labour. No discrimination in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation. Not commit any physical abuse, threatened, harassment or verbal abuse towards the employees.</p> </td> </tr> </table>	Document	Social Policy	Signed By	President & Chief Operating Officer	Date	14/09/2020.	Content of Policy	<p>Respect human rights and support international human rights law. Provide safe and healthy working environment. Respect the right of workers to join or form legal trade unions. Not use any child labour. No discrimination in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation. Not commit any physical abuse, threatened, harassment or verbal abuse towards the employees.</p>	Complied
Document	Social Policy										
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4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements.</p>	<p>The management has to ensure that employees pay and condition meet legal or industry minimum standards and as per agreed</p>	Complied								

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																		
	<p>The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>Collective Agreements. Refer on contract agreement between employer and employee, sighted the basic salary was stated in agreement. Sighted the document as below sample evidence:</p> <p>Details information sample of contract agreement and salary:</p> <table border="1"> <tr> <td>Document</td> <td>Employment Agreement</td> </tr> <tr> <td>Employee No</td> <td>02XXX</td> </tr> <tr> <td>Date Agreement</td> <td>04/10/2023</td> </tr> <tr> <td>Category</td> <td>Local Worker - Cleaner</td> </tr> <tr> <td>Payment Term</td> <td>Daily Rate @ 26 Days</td> </tr> <tr> <td>Signed</td> <td>Employer & Employee</td> </tr> <tr> <td>Basic Salary</td> <td>RM57.69 / Day RM1500 / Month</td> </tr> <tr> <td>Pay Slip</td> <td>RM15XX.XX – Oct 2023 RM15XX.XX – Nov 2023 RM25XX.XX – Dec 2023</td> </tr> <tr> <td>Pay Slip Contribution</td> <td>EPF – Available SOCSO – Available EIS – Available</td> </tr> </table> <p>Based on the record on pay slip. The payment on employee is meet the industry minimum standard. Based on interview with the random sampling of workers. There are understand the term and condition stated in employment agreement such basic salary, annul leave, public holiday, working hours, overtime and job description.</p>	Document	Employment Agreement	Employee No	02XXX	Date Agreement	04/10/2023	Category	Local Worker - Cleaner	Payment Term	Daily Rate @ 26 Days	Signed	Employer & Employee	Basic Salary	RM57.69 / Day RM1500 / Month	Pay Slip	RM15XX.XX – Oct 2023 RM15XX.XX – Nov 2023 RM25XX.XX – Dec 2023	Pay Slip Contribution	EPF – Available SOCSO – Available EIS – Available	
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Pay Slip Contribution	EPF – Available SOCSO – Available EIS – Available																				
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p>	<p>The management has ensured the contractor are paid his employee based on minimum wages. Sighted also the contractor has provide the contract agreement to his employee. Sighted the evidence:</p> <p>Details information sample of contract agreement for contractor:</p>	Complied																		

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance														
	- Minor compliance -	<table border="1"> <tr><td>Document</td><td>Contract Agreement</td></tr> <tr><td>Contractor</td><td>TXX TXXX KXXX SXX BXX</td></tr> <tr><td>Scope work</td><td>CPO Transporter</td></tr> <tr><td>Date</td><td>28/11/2023</td></tr> <tr><td>Signed</td><td>Contractor & Employee</td></tr> <tr><td>Payment Term</td><td>Piece Rate</td></tr> <tr><td>Pay Slip</td><td>RM62XX.XX – Oct 2023 RM51XX.XX – Jun 2023 RM59XX.XX – Aug 2023</td></tr> </table> <p>Based on the record on pay slip. The payment of contractor to his employee is more than industry minimum standard.</p>	Document	Contract Agreement	Contractor	TXX TXXX KXXX SXX BXX	Scope work	CPO Transporter	Date	28/11/2023	Signed	Contractor & Employee	Payment Term	Piece Rate	Pay Slip	RM62XX.XX – Oct 2023 RM51XX.XX – Jun 2023 RM59XX.XX – Aug 2023		
Document	Contract Agreement																	
Contractor	TXX TXXX KXXX SXX BXX																	
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4.4.5.5	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The management has established records that provide an accurate account of all employees on the premises. The records have been containing the full names, gender, date of birth, date of entry, a job description, wage and the period of employment. Sighted the document as below sample evidence:</p> <p>Details information sample of contract agreement of worker:</p> <table border="1"> <tr><td>Document</td><td>Employment Agreement</td></tr> <tr><td>Employee No</td><td>03XXX</td></tr> <tr><td>Date Agreement</td><td>04/10/2023</td></tr> <tr><td>Category</td><td>Local Worker – FFB Grader</td></tr> <tr><td>Detail Information</td><td>Full Name – MXXX HXX BXX AXXXXX Gender – Male Date of Birth – 14/04/1988 Date Entry – 22/02/2023 Job Description – FFB Grader Wage – RM15XX / Month</td></tr> </table>	Document	Employment Agreement	Employee No	03XXX	Date Agreement	04/10/2023	Category	Local Worker – FFB Grader	Detail Information	Full Name – MXXX HXX BXX AXXXXX Gender – Male Date of Birth – 14/04/1988 Date Entry – 22/02/2023 Job Description – FFB Grader Wage – RM15XX / Month		Complied				
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Date Agreement	04/10/2023																	
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance											
<p>4.4.5.6</p> <p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>All employees have been provided with fair contracts that have been signed by both employee and employer. The copy of employment contract is available for each employee and it was kept as employment records. Sighted the evidence:</p> <p>Details information sample of contract agreement of worker:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Document</td> <td>Employment Agreement</td> </tr> <tr> <td>Employee No</td> <td>03XXX</td> </tr> <tr> <td>Date Agreement</td> <td>04/10/2023</td> </tr> <tr> <td>Category</td> <td>Local Worker – FFB Grader</td> </tr> <tr> <td>Signed</td> <td>Employer & employee</td> </tr> <tr> <td>Observation</td> <td>Copy of agreement has provided to employee. The payment has been paid as per contract agreement</td> </tr> </table> <p>Based on interview with the random sampling of workers. There are understand the term and condition stated in employment agreement such basic salary, annul leave, public holiday, working hours, overtime and job description.</p>	Document	Employment Agreement	Employee No	03XXX	Date Agreement	04/10/2023	Category	Local Worker – FFB Grader	Signed	Employer & employee	Observation	Copy of agreement has provided to employee. The payment has been paid as per contract agreement	<p>Complied</p>
Document	Employment Agreement													
Employee No	03XXX													
Date Agreement	04/10/2023													
Category	Local Worker – FFB Grader													
Signed	Employer & employee													
Observation	Copy of agreement has provided to employee. The payment has been paid as per contract agreement													
<p>4.4.5.7</p> <p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p>- Major compliance -</p>	<p>The management has established a time recording system that makes working hours and overtime transparent for both employees and employer. The overtime has recorded transparent in the pay slip of employee. Sighted the evidence:</p> <p>Details information sample of payslip of employee:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Document</td> <td>Employment Agreement</td> </tr> <tr> <td>Employee No</td> <td>03XXX</td> </tr> <tr> <td>Date Agreement</td> <td>04/10/2023</td> </tr> <tr> <td>Category</td> <td>Local Worker – FFB Grader</td> </tr> </table>	Document	Employment Agreement	Employee No	03XXX	Date Agreement	04/10/2023	Category	Local Worker – FFB Grader	<p>Complied</p>				
Document	Employment Agreement													
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Date Agreement	04/10/2023													
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance												
		<table border="1"> <tr> <td>Signed</td> <td>Employer & employee</td> </tr> <tr> <td>Working Hour</td> <td>7.5 Hours</td> </tr> <tr> <td>Overtime Approved</td> <td>104 Hour</td> </tr> <tr> <td>Overtime calculated</td> <td>Basic Wage / 7.5 Hr x 1.5 (Normal) Basic Wage / 7.5 Hr x 2.0 (Rest Day) Basic Wage / 7.5 hr x 3.0 (Public Day)</td> </tr> <tr> <td>Overtime: Dec 2023</td> <td>Normal: 33.5 Hours @ RM3XX.XX Rest Day: 2.5 Hours @ RM3X.XX</td> </tr> <tr> <td>Overtime: Nov 2023</td> <td>Normal: 31.0 Hours @ RM3XX.XX Rest Day: 3.5 Hours @ RM5X.XX</td> </tr> </table> <p>Based on interview with the random sampling of workers. They are informed that overtime has paid as per stated in agreement and No deduction overtime.</p>	Signed	Employer & employee	Working Hour	7.5 Hours	Overtime Approved	104 Hour	Overtime calculated	Basic Wage / 7.5 Hr x 1.5 (Normal) Basic Wage / 7.5 Hr x 2.0 (Rest Day) Basic Wage / 7.5 hr x 3.0 (Public Day)	Overtime: Dec 2023	Normal: 33.5 Hours @ RM3XX.XX Rest Day: 2.5 Hours @ RM3X.XX	Overtime: Nov 2023	Normal: 31.0 Hours @ RM3XX.XX Rest Day: 3.5 Hours @ RM5X.XX		
Signed	Employer & employee															
Working Hour	7.5 Hours															
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Overtime: Nov 2023	Normal: 31.0 Hours @ RM3XX.XX Rest Day: 3.5 Hours @ RM5X.XX															
4.4.5.8	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p>- Major compliance -</p>	<p>The working hours and breaks of each individual employee as indicated in the time records has comply with legal regulations and collective agreements. Sighted the evidence:</p> <p>Details information of working hours for employee (Office Clerk):</p> <table border="1"> <tr> <td>Working Time</td> <td>08:00am – 5:00pm</td> </tr> <tr> <td>Rest Time</td> <td>1:00pm – 2:30pm</td> </tr> <tr> <td>Working Hours</td> <td>7.5 Hours</td> </tr> </table> <p>Details information of working hours for employee (Operator):</p> <table border="1"> <tr> <td>Working Time</td> <td>09:30am – 5:00pm</td> </tr> <tr> <td>Rest Time</td> <td>1:00pm – 2:30pm</td> </tr> <tr> <td>Working Hours</td> <td>7.5 Hours</td> </tr> </table>	Working Time	08:00am – 5:00pm	Rest Time	1:00pm – 2:30pm	Working Hours	7.5 Hours	Working Time	09:30am – 5:00pm	Rest Time	1:00pm – 2:30pm	Working Hours	7.5 Hours		Complied
Working Time	08:00am – 5:00pm															
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Working Hours	7.5 Hours															
Working Time	09:30am – 5:00pm															
Rest Time	1:00pm – 2:30pm															
Working Hours	7.5 Hours															
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p>	<p>Based on the payslips and check roll book sampled. There is evidence that wages and overtime payment are in line with the government act and regulation. Sighted the evidence:</p>		Complied												

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance
	- Major compliance -	Document	Employment Agreement	
		Employee No	03XXX	
		Date Agreement	04/10/2023	
		Category	Local Worker – FFB Grader	
		Basic Wages	Sighted basic salary in Pay Slip The salary meets the minimum wages	
		Overtime	Sighted overtime paid in Pay Slip The overtime not over than limit	
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. - Minor compliance -	Social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, medical care and health provisions. Sighted the evidence Details information sample of benefit to employee:		Complied
		Medical	Medical treatment support by company	
		Housing	Housing for all workers	
		Water supply	Water supply provide by company	
		Electric supply	Electric supply provided by company	
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	The management has provided the workers housing at line site were provided with facilities provided such as treated water and electricity. The management also has conducted the housing inspection to ensure the housekeeping in good condition. Sighted the evidence: Details information employee residence and facilities:		Complied
		Housing	Housing for all workers	
		Water supply	Water supply provide by company	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance								
		Electric supply	Electric supply provided by company									
4.4.5.12	<p>The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>The management has established a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. Sighted document as below evidence:</p> <p>Details information of policy of company:</p> <table border="1"> <tr> <td>Document</td> <td>Sexual Harassment Policy</td> </tr> <tr> <td>Signed By</td> <td>Chief Operating Office</td> </tr> <tr> <td>Date</td> <td>03/08/2009</td> </tr> <tr> <td>Training Policy</td> <td>All policies have display at notice board. Training policy was done conducted on 08/01/2024</td> </tr> </table> <p>Based on interview with the female worker representative, there is No issue and No record complaint that related sexual harassment happen in the estate. Besides that, they are aware on compliant procedure and method of complaint.</p>		Document	Sexual Harassment Policy	Signed By	Chief Operating Office	Date	03/08/2009	Training Policy	All policies have display at notice board. Training policy was done conducted on 08/01/2024	Complied
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Signed By	Chief Operating Office											
Date	03/08/2009											
Training Policy	All policies have display at notice board. Training policy was done conducted on 08/01/2024											
4.4.5.13	<p>The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>The management has respected the right of all employees to form or join trade union. The employees have been given the freedom to join a trade union relevant to the industry where is sighted the workers association in operating unit. Sighted the evidence:</p> <p>Details information of policy of company:</p> <table border="1"> <tr> <td>Document</td> <td>Social Policy</td> </tr> <tr> <td>Signed By</td> <td>President & Chief Operating Officer</td> </tr> <tr> <td>Date</td> <td>14/09/2020.</td> </tr> <tr> <td>Content of Policy</td> <td>Respect human rights and support international human rights law.</td> </tr> </table>		Document	Social Policy	Signed By	President & Chief Operating Officer	Date	14/09/2020.	Content of Policy	Respect human rights and support international human rights law.	Complied
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance										
			Respect the right of workers to join or form legal trade unions											
		Based on interview with the representative of employee. They are informed that currently practice is regular meeting with the employee committee and management team for discussion and to meet objective.												
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. - Major compliance -	<p>The management has established policy that focus on children and young person is not employed or exploited. The minimum age complies with local, state and national legislation. During audit time, there was not sighted the children or young person was working and no record in workers master list. Sighted the evidence: Details information of policy of company:</p> <table border="1"> <tr> <td>Document</td> <td>Social Policy</td> </tr> <tr> <td>Signed By</td> <td>President & Chief Operating Officer</td> </tr> <tr> <td>Date</td> <td>14/09/2020.</td> </tr> <tr> <td>Content of Policy</td> <td>Not use any child labour.</td> </tr> <tr> <td>Training Policy</td> <td>All policies have display at notice board Training policy was done conducted on 08/01/2024</td> </tr> </table> <p>From the interview and record of employee there is No evidence of children and young person employ in estate.</p>		Document	Social Policy	Signed By	President & Chief Operating Officer	Date	14/09/2020.	Content of Policy	Not use any child labour.	Training Policy	All policies have display at notice board Training policy was done conducted on 08/01/2024	Complied
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Criterion 4.4.6: Training and competency														
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.	All employees and contractors undergo proper training. The Mill management has established a training matrix and training		Complied										

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																								
	- Major compliance -	<p>program for the year 2023 and 2024 to ensure that relevant and necessary training is provided to individuals.</p> <p>Genting Ayer Item Oil Mill</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>CPO & Chemical Spillage Procedure</td> <td>01/02/2023</td> </tr> <tr> <td>Company Policies Training</td> <td>02/01/2023</td> </tr> <tr> <td>Sustainability Procedure Training</td> <td>07/11/2023</td> </tr> <tr> <td>Effluent Treatment Plant</td> <td>24/10/2023</td> </tr> <tr> <td>Noise Awareness Training</td> <td>06/10/2023</td> </tr> <tr> <td>Tractor Driver Training</td> <td>02/09/2023</td> </tr> <tr> <td>AGTES Training</td> <td>25-27/07/2023</td> </tr> <tr> <td>SDS Training</td> <td>07/05/2023</td> </tr> <tr> <td>HIRARC Training</td> <td>26/02/2023</td> </tr> <tr> <td>First Aid Training</td> <td>19-20/12/2022</td> </tr> <tr> <td>ERP Training</td> <td>24/10/2023</td> </tr> </tbody> </table>	Training	Date	CPO & Chemical Spillage Procedure	01/02/2023	Company Policies Training	02/01/2023	Sustainability Procedure Training	07/11/2023	Effluent Treatment Plant	24/10/2023	Noise Awareness Training	06/10/2023	Tractor Driver Training	02/09/2023	AGTES Training	25-27/07/2023	SDS Training	07/05/2023	HIRARC Training	26/02/2023	First Aid Training	19-20/12/2022	ERP Training	24/10/2023	
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4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>The Mill has devised a comprehensive training program for mill executives, workers, and contractors based on a training needs analysis. This analysis is documented in the Training Matrix analysis, which considers job designations and identifies various types of training needs for employees. The training types are categorized into three groups: Core training, non-core training – theoretical training, and non-core training – theoretical and hands-on training. Identified training needs have been planned and implemented.</p>	Complied																								
4.4.6.3	<p>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function</p>	<p>The Mill maintains an annual training program that is updated through a training needs analysis. The identified training sessions are scheduled throughout the year, with the latest programming</p>	Complied																								

Criterion / Indicator		Assessment Findings	Compliance
	and responsibility in accordance to the documented training procedure. - Minor compliance -	being dated January 2024. This ensures that training initiatives align with the evolving needs of the estate's workforce.	
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	The Management has established an Environment Policy signed by Yong Chee Kong (Chief Operating Officer) dated 05/10/2009. Based on the Environmental Policy, the Company is committed to the implementation of the following practices: a. Comply with all applicable laws and other regulations about the Environment; b. Adopt suitable pollution prevention measures that will enhance the current practices towards sustainable development; c. Set realistic goals and monitor progress to ensure continual improvement in environmental performance; and d. Ensure that our stakeholders are aware of and share our commitment to responsible environmental stewardship. The policy and plan were communicated to the employees through various methods such as training, briefings, and display on notice boards.	Complied
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations - Major compliance -	The environment management plan covers: a. Management has established Environment Policy signed by Chief Operating Officer dated 05/10/2009.	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance										
		<p>b. The management has established Environmental Aspect and Impact Register prepared on 15/01/2024. The EAI covering the following Mill activities: -</p> <ul style="list-style-type: none"> i. Product Storage and dispatch ii. Laboratory iii. Workshop, etc <p>Sample taken on CPO clarifier: -</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Activity</td> <td>CPO Clarifying</td> </tr> <tr> <td>Environmental Aspects</td> <td>Water pollution Risk of contaminated CPO with oil</td> </tr> <tr> <td>Legal Requirement</td> <td>EQA</td> </tr> <tr> <td>Mitigation Plan</td> <td>Install and maintain high level siren at sludge tank, hot water tank and CPO tank. Channel al spillage of CPO & Sludge to sludge pit for recovery purposes. Recover oil from sludge pit to oil room for reprocess. Regular services and maintenance of machinery. Containment via bunds for machinery gearbox.</td> </tr> <tr> <td></td> <td>Training and briefing to chemical handler</td> </tr> </table>	Activity	CPO Clarifying	Environmental Aspects	Water pollution Risk of contaminated CPO with oil	Legal Requirement	EQA	Mitigation Plan	Install and maintain high level siren at sludge tank, hot water tank and CPO tank. Channel al spillage of CPO & Sludge to sludge pit for recovery purposes. Recover oil from sludge pit to oil room for reprocess. Regular services and maintenance of machinery. Containment via bunds for machinery gearbox.		Training and briefing to chemical handler	
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	Training and briefing to chemical handler												
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p>- Major compliance -</p>	<p>Mill Environmental Management Plan for the year 2024 has developed the mitigation of the negative impacts and promoted the positive ones and effectively implemented and monitored. The plan dated 15/01/2024 as follows: -</p>	Complied										

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings					Compliance
		Source	Negatives Impacts	Mitigation Plan	Action Plan	Status	
		Air Pollution					
		Open Burning	Air Pollution	Enforce a no burning policy	Regular Site Inspection	Compliance	
		Water Pollutions					
		Pollutions from mill operations	Mill waste by product	Provide safe temporary storage at mill	Weighbridge tickets on by products offtake and evacuation	On -going	
		Noise Pollution					
		Noise from mill operation	Nuisance and health impact	To implement engineering control – isolation and guarding of area	To conduct site inspection and documented.	If any	
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	The Management has established a Continuous Improvement Plan dated 16/01/2024 which consists of the following: - a. Environmental Impacts To improve on Environmental aspects and impacts risk assessment and risk control by regular monitoring of water quality. b. Waste Reduction					Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings				Compliance								
		<p>Maximizing recycling and minimizing waste or by-product generation through an awareness recycling campaign.</p> <p>c. Pollution and greenhouse gas (GHG) emission To minimize the contaminated discharge to the monsoon drain.</p> <p>d. Social Impacts To improve and maintain the interior and exterior of workers' quarters by carrying out necessary repairs.</p> <p>e. Water Consumption and water quality Clean water is a scarce resource refer to the water management plan as guidance.</p> <p>f. Energy Consumption To ensure the use of efficient diesel & electricity.</p> <p>g. Training Training Program for relevant personnel involved in the implementation of new technology/techniques.</p> <p>h. Water Consumption and water quality Clean water is a scarce resource refer to the water management plan as guidance.</p>												
4.5.1.5	<p>An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives.</p> <p>- Major compliance -</p>	<p>The Mill has established the Environmental Training Program 2024 as below: -</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;">No</th> <th style="width: 45%;">Training Program</th> <th style="width: 20%;">No of Participants</th> <th style="width: 30%;">Date</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Schedule Waste management system Training</td> <td style="text-align: center;">23</td> <td style="text-align: center;">02/03/2023</td> </tr> </tbody> </table>				No	Training Program	No of Participants	Date	1	Schedule Waste management system Training	23	02/03/2023	Complied
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1	Schedule Waste management system Training	23	02/03/2023											

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings				Compliance	
		2	Schedule Waste Management system Training	23	08/06/2023		
		Interviews with staff/workers during the site visit to the effluent ponds, POME Land Application, scheduled waste store & EFB platform they demonstrated good awareness of environmental issues.					
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	The mill has conducted a periodic Environmental Management meeting monthly. The latest environmental meeting was on 20/12/2024 attended by 15 representatives comprising Mill Management and the workers' representatives.				Complied	
Criterion 4.5.2: Efficiency of energy use and use of renewable energy							
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period - Major compliance -	Available a record of monitoring of diesel & electricity consumption (Jan-Dec 2023) for auditor verification:				Complied	
		Month (2023)	FFB (mt)	CPO (mt)	Diesel (lt)	Electricity (kW)	Water (l)
		Jan	13647	2744	1862	50450	25328
		Feb	12481	2460	2040	43470	22980
		Mac	12137	2410	1865	54250	25961
		Apr	12034	2486	2395	50900	23743
		May	16325	3392	3255	46520	37370
		Jun	11902	2496	2460	60310	27972
		Jul	20650	4151	2770	32240	42613
		Aug	20229	4178	2175	34450	38812
		Sep	20099	4244	2450	35310	32678
		Oct	15723	3374	1890	45120	32180

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings					Compliance	
		Nov	17819	3582	2025	44650	31977	
		Dec	17065	3478	3670	54600	31153	
		The management maintained the monthly records of non-renewable energy including actual usage, estimated usage, and baseline value. The graph is also established to show the non-renewable usage trend.						
4.5.2.2	Palm oil millers shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. - Major compliance -	Available estimation of diesel and electricity usage as documented. The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel to determine the energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective Mill yearly budgets.					Complied	
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	The mill uses by-products of FFB production as a renewable energy source where 100% of fiber and shell are extracted from FFB production. The production and used data are as below;-					Complied	
			2021	2022	2023			
		FFB / Mt	195679	216966	190116			
		Fibre (Mt)	36787	39989	35741			
		kWH	4244702	4730957	3795586			
		Kwh / Mt FFB	21.69	21.80	19.96			
		Fibre used/mt FFB	0.188	0.184	0.188			
Criterion 4.5.3: Waste management and disposal								
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	All waste products and source of pollution are identified in Identification, Segregation and Storage of Waste dated 16/01/2024. Details as below: -					Complied	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings			Compliance
		Source of waste	Waste Product	Storage / handling/ disposal	
		Chemical Store	Chemical containers	Used containers will be sent to empty container store	
		Fertilizer store	Bags	Used bags will be kept at Empty Fertilizer Bag store	
		Workshop	Filters	Used filters will be kept at oil strainer tray before transfer to schedule waste store.	
		Scheduled Waste Store	Schedule waste	Stored in designated containers according to the category of wastes.	
		Diesel Tank	Scheduled Waste	Contaminated soil or fiber sent to scheduled waste store	
		Oil Mill & Resident area	Domestic	Collected twice a week by contractor	
4.5.3.2	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p>- Major compliance -</p>	<p>The waste management established covers;</p> <p>a. All waste and pollution are identified and documented in the Identification of Source and Type of Waste Format. Details of the management plan as described below. This is a continuation of the 4.5.3.1 above.</p> <p>b. Waste management plan was established by the estate to include pollution source, management plan and monitoring plan. For example, source of waste and mitigation plan for scheduled waste, domestic wastes and recyclable waste. The action plan is sighted as follows:</p>			Major Non Compliance

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance														
		<p>i. Disposal as scheduled waste by DOE-approved contractor</p> <p>ii. Disposal of domestic wastes via authorized contractor</p> <p>Segregation of waste and store at designated recyclable waste areas.</p> <p>Waste management plan was not effectively implemented.</p> <p>During site visit at mill compound area, it was noticed use of empty lubricant containers for domestic purpose. It was not in line with management plan stated Prevent miss used / miss placed of schedule waste items at surrounding mill compound, Monitoring Plan: Workplace inspection safety and daily monitoring. Refer Monthly workplace Inspection dated 28/12/2023.</p> <p>Thus, Major NC was raised.</p>															
4.5.3.3	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p>- Major compliance -</p>	<p>The management has established the Standard Operating Procedure under Sustainability Management Procedure Manual, Scheduled Waste Management, Doc No SMP-GPB-11 Revision 2 Issue date; September 2020, Sustainability Management Procedure Manual, SOPs and Justification of Pesticides Used, Doc No SMP-GPB-28 Revision 5 Issue date; September 2020.</p> <p>Sighted the appointed licensed collector to collect the scheduled wastes at the Mill. The latest disposal of scheduled waste for the Mill is as follows;</p> <table border="1"> <thead> <tr> <th>SW</th> <th>Waste Name</th> <th>Previous Disposal</th> <th>Date Generated</th> <th>Date Latest Disposed</th> <th>No days from date generated to recent disposed</th> <th>Contractor</th> </tr> </thead> <tbody> <tr> <td>109</td> <td>Electrical waste</td> <td>27/7/23 118 kg</td> <td>28/7/2023</td> <td>25/1/24 53kg</td> <td>180</td> <td>Kualiti Alam Sdn Bhd</td> </tr> </tbody> </table>	SW	Waste Name	Previous Disposal	Date Generated	Date Latest Disposed	No days from date generated to recent disposed	Contractor	109	Electrical waste	27/7/23 118 kg	28/7/2023	25/1/24 53kg	180	Kualiti Alam Sdn Bhd	Complied
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings					Compliance	
		110	Electrical Assemble	27/6/23 83 kg	28/7/2023	25/1/24 163	180	
		305	Used hydraulic oil	27/7/23 1600 kg	28/7/2023	25/1/24 10390 kgs	180	
		322	Waste water chemical tasting		1/8/2023	30/1/24 1114 kg	180	Sothern Strenggh (M) SB
		409	Contaminate chemical container	27/7/23 190 kg	7/8/23	30/1/24 391.5kg	180	
		<p>During the visit to the scheduled store noticed that the scheduled store was well managed. The scheduled waste stock balance is minimum in quantity science the last scheduled waste disposal was on 30/01/24. The labelling of the schedule was per Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974, and Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005. The eSWISS records were verified and found that all scheduled waste items were properly documented.</p>						
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	<p>Domestic Waste Management procedure [SMP-GPB-12, rev. 01, dated 01/12/2014]. The procedure outlines the criteria to be considered in selecting a landfill area and the method to construct a waste pit.</p> <p>Domestic waste is collected twice a week by the authorized contractor Mrs xxx Enterprise and disposed to the disposal area under Majlis Perbandaran Pekan Nenas, Johor.</p>						Complied
Criterion 4.5.4: Reduction of pollution and emission including greenhouse gas								

Criterion / Indicator		Assessment Findings	Compliance																																			
<p>4.5.4.1</p>	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p>	<p>All polluting activities were identified through the environmental aspect and impact evaluation register which includes all the mill's activities such as sterilization, laboratory, etc. The register was last reviewed on 26/01/2024.</p> <p>Data on the level of Greenhouse gas (GHG) emissions are monitored and compiled yearly through the GHG calculation methodology accepted for RSPO and ISCC GHG calculations and certifications which are analyzed. As evidence, sighted the GHG Calculation for Genting Ayer Itam POM year Jun 2022- July 023 using GHG RSPO Palm GHG Calculator, V.3.0.1.</p> <table border="1" data-bbox="1093 778 1792 914"> <thead> <tr> <th>Product</th> <th>kgCOe2/mt-product</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>936.96</td> </tr> <tr> <td>PK</td> <td>431.07</td> </tr> <tr> <td>PKO</td> <td>0</td> </tr> </tbody> </table> <table border="1" data-bbox="1093 963 1865 1398"> <thead> <tr> <th>Description</th> <th>kgCO₂</th> <th>kCO₂E / mt FFB</th> </tr> </thead> <tbody> <tr> <td colspan="3">Emission sources</td> </tr> <tr> <td>POME</td> <td>1,355,558</td> <td>56.00</td> </tr> <tr> <td>Fuel Consumption</td> <td>624,909</td> <td>16.07</td> </tr> <tr> <td>Grid Electricity Utilization</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td colspan="3">Credits</td> </tr> <tr> <td>Export of excess electricity to housing and grid</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Sales of PKS</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Sales of EFB</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table>	Product	kgCOe2/mt-product	CPO	936.96	PK	431.07	PKO	0	Description	kgCO ₂	kCO ₂ E / mt FFB	Emission sources			POME	1,355,558	56.00	Fuel Consumption	624,909	16.07	Grid Electricity Utilization	0.00	0.00	Credits			Export of excess electricity to housing and grid	0.00	0.00	Sales of PKS	0.00	0.00	Sales of EFB	0.00	0.00	<p>Complied</p>
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings				Compliance								
		Total		1,980467	72.07									
		<p>The identification and significant determination of environmental aspects has identified boiler and incinerator chimneys as one of the sources of pollution. Monitoring was through stack monitoring of dust particulate and dark smoke observation.</p> <p>Sighted the sample Stack Emission Monitoring Report dated 25/05/2024; Report ref. MS/GTOM/2022/Boiler No 2 (s2) – 1ST Half. The result is as follows: -</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Parameter</th> <th style="width: 15%;">Unit</th> <th style="width: 20%;">Boiler No 2</th> <th style="width: 35%;">Regulations</th> </tr> </thead> <tbody> <tr> <td>Total particulate matter@12%CO 2</td> <td>Mg/m3</td> <td>117.8</td> <td>150</td> </tr> </tbody> </table> <p>The gas concentrations measured during the sampling period show that all the parameters are within the analyser’s detectable limit.</p>				Parameter	Unit	Boiler No 2	Regulations	Total particulate matter@12%CO 2	Mg/m3	117.8	150	
Parameter	Unit	Boiler No 2	Regulations											
Total particulate matter@12%CO 2	Mg/m3	117.8	150											
4.5.4.2	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p>	<p>The action plan to reduce the polluting activities has been assessed during Environmental Aspect and Impact Assessment. The EAI assessment findings including list of polluting sources, risk and mitigation plan have been documented in the Identification of Environmental Aspect. Other plans are: -</p> <ul style="list-style-type: none"> a. Emission of Dark Smoke Mill Stack - Installation of air pollution device and Inspection of Vehicle Conditions b. Emission of Noise Boundary - parameter noise mapping data keeping <p>Electrostatic precipitator system in mill to fulfil DOE clean air regulation. High particulate flue gas from boiler is filtered through ESP before releasing to atmosphere.</p>				Complied								

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																													
<p>4.5.4.3</p> <p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p>- Major compliance -</p>	<p>The effluent treatment plant was made in accordance and an interview with the operator in charge revealed that the operation was under standard operation procedure and legal requirements. No overflow was observed, and flow meter reading was recorded daily. GAIPOM records the effluent monitoring for DOE submission in the 'Borang Penyata Suku Tahunan'. (License no 003866) Details as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Month</th> <th>Date</th> <th>pH</th> <th>BOD3</th> </tr> </thead> <tbody> <tr> <td></td> <td>Standard</td> <td>5.0-9.0</td> <td>500</td> </tr> <tr> <td rowspan="2">Oct-23</td> <td>13/10</td> <td>8.0</td> <td>76</td> </tr> <tr> <td>17/10</td> <td>8.2</td> <td>330</td> </tr> <tr> <td rowspan="2">Nov-23</td> <td>7/11</td> <td>8.8</td> <td>56</td> </tr> <tr> <td>21/11</td> <td>8.0</td> <td>40</td> </tr> <tr> <td rowspan="2">Dec-23</td> <td>5/12</td> <td>8.5</td> <td>91</td> </tr> <tr> <td>9/12</td> <td>8.5</td> <td>72</td> </tr> </tbody> </table> <p>The Mill license was for land application and the requirement is for the BOD to be less than 20mg/l. Effluent samples are analyzed in Envilab Sdn Bhd Johor.</p>		Month	Date	pH	BOD3		Standard	5.0-9.0	500	Oct-23	13/10	8.0	76	17/10	8.2	330	Nov-23	7/11	8.8	56	21/11	8.0	40	Dec-23	5/12	8.5	91	9/12	8.5	72	<p>Complied</p>
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Criterion 4.5.5: Natural water resources																																
<p>4.5.5.1</p> <p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <p>a) Assessment of water usage and sources.</p>	<p>The mill has established and documented Water management Plan 2024, dated 15/01/2024 on Raw water for mill processing and drinking water supply.</p> <p>a. The water is sourced from the rainwater reservoir which is located near the mill. The consumption is closely monitored to avoid overuse. The details as below: -</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Year</th> <th>Water Consumption</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>		Year	Water Consumption			<p>Complied</p>																									
Year	Water Consumption																															

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings						Compliance																									
	b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). - Major compliance -		FFB Process	Mill	Domestic	Total Water Consumption	Water Usage / Mt FFB Processed																										
		2021	195679	302969	58785	361754	1.55																										
		2022	216967	320977	43471	380492	1.48																										
		2023	190116	300070	43995	373767	1.58																										
		The drinking water was obtained from a tube well. The report of the water analysis sample received on 03/10/2023, sampling date 17/10/2023 – Drinking Water																															
		<table border="1"> <thead> <tr> <th>Parameter</th> <th>Results</th> <th>Drinking Water Quality standard</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>7.1</td> <td>6.5 – 9.0</td> </tr> <tr> <td>Turbidity</td> <td>0.5</td> <td>5</td> </tr> <tr> <td>Total Dissolved Solids</td> <td>59</td> <td>1000</td> </tr> <tr> <td>Aluminium</td> <td>0.076</td> <td>0.2</td> </tr> <tr> <td>Ammonical Nitrogen</td> <td><0.03</td> <td>0.03</td> </tr> <tr> <td>Chloride</td> <td>15.69</td> <td>250</td> </tr> <tr> <td>E-Coli</td> <td>ND (<1.8)</td> <td>ND in 100ml</td> </tr> <tr> <td>Total Coliform Count</td> <td>ND (<1.8)</td> <td>ND in 100ml</td> </tr> </tbody> </table>			Parameter	Results	Drinking Water Quality standard	pH	7.1	6.5 – 9.0	Turbidity	0.5	5	Total Dissolved Solids	59	1000	Aluminium	0.076	0.2	Ammonical Nitrogen	<0.03	0.03	Chloride	15.69	250	E-Coli	ND (<1.8)	ND in 100ml	Total Coliform Count	ND (<1.8)	ND in 100ml		
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		b. Water Analysis Test Report (MABB 2235/23) sampled on 02/01/2024 & 03/10/24 was available for verification. The results dated 10/01/2024 & 12/10/24 indicated that samples taken at 2 sampling points at the field outlet field drain are below the trash hold in terms of pH, BOD level, COD level, SS, TN, AN, O&G, DO*, and P.																															

**MSPO Public Summary Report
Revision 2 (Nov 2021)**

Criterion / Indicator		Assessment Findings					Compliance																																																	
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Test Parameter</th> <th colspan="2">Sample 10/1/24</th> <th colspan="2">Sample 12/10/24</th> </tr> <tr> <th>Hulu</th> <th>Hilir</th> <th>Hulu</th> <th>Hilir</th> </tr> </thead> <tbody> <tr> <td>1. pH</td> <td>4.5</td> <td>4.5</td> <td>5.0</td> <td>4.9</td> </tr> <tr> <td>2. COD</td> <td>267</td> <td>207</td> <td>202</td> <td>207</td> </tr> <tr> <td>3. BOD</td> <td>15</td> <td>13</td> <td>16</td> <td>14</td> </tr> <tr> <td>4. S Solid</td> <td>56</td> <td>50</td> <td>60</td> <td>58</td> </tr> <tr> <td>5. Ammonical Nitrogen</td> <td>3.3</td> <td>2.7</td> <td>4.0</td> <td>3.7</td> </tr> <tr> <td>6. Phosphorus</td> <td>3.1</td> <td>2.81</td> <td>3.12</td> <td>2.87</td> </tr> <tr> <td>7. E coli</td> <td>4.5</td> <td>ND</td> <td>2.0</td> <td>ND</td> </tr> <tr> <td>8. Dissolved Oxygen</td> <td>3.9</td> <td>3.9</td> <td>3.9</td> <td>3.9</td> </tr> </tbody> </table> <p>Verified also the result of water analysis for effluent pond dated 10/10/2023 at Algae No: 6 – Outlet Pond 6 & Farrow (POM land application).</p> <p>The management has been designed in such a way that the rainwater from the monsoon drains from the mill and office compound is channelled into oil traps before being released to the field drain and the sludge pit prior pumped into the effluent pond.</p>					Test Parameter	Sample 10/1/24		Sample 12/10/24		Hulu	Hilir	Hulu	Hilir	1. pH	4.5	4.5	5.0	4.9	2. COD	267	207	202	207	3. BOD	15	13	16	14	4. S Solid	56	50	60	58	5. Ammonical Nitrogen	3.3	2.7	4.0	3.7	6. Phosphorus	3.1	2.81	3.12	2.87	7. E coli	4.5	ND	2.0	ND	8. Dissolved Oxygen	3.9	3.9	3.9	3.9	
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8. Dissolved Oxygen	3.9	3.9	3.9	3.9																																																				
4.5.5.2	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations. - Major compliance -	<p>Mill does the final discharge to furrow into the field in Block 99, Sinmah Division, Sungei Rakyat Estate at an average capacity of 600-800 M³ per day. There are 28 valves maintained with 20-30 units of flatbeds for each valve. The water analysis results for Effluent Pond dated 10/01/2024 is as follows;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Test Parameter</th> <th>Aerobic Pond 4</th> <th>Anaerobic Pond 5</th> <th>Stabilizing Pond</th> <th>Final Discharge</th> </tr> </thead> <tbody> <tr> <td>1. pH</td> <td>8.4</td> <td>8.8</td> <td>8.7</td> <td>8.9</td> </tr> <tr> <td>2. COD</td> <td>1763</td> <td>1943</td> <td>1045</td> <td>1110</td> </tr> </tbody> </table>					Test Parameter	Aerobic Pond 4	Anaerobic Pond 5	Stabilizing Pond	Final Discharge	1. pH	8.4	8.8	8.7	8.9	2. COD	1763	1943	1045	1110	Complied																																		
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings					Compliance
		3. BOD	581	293	107	162	
		4. Suspend Solid	1180	520	270	253	
		5. Ammonical Nitrogen	191	145	66	54	
		6. Oil & Grease	25	18	3	ND	
		7. T Nitrogen	268	197	110	98	
		<p>The site visit to review the POME land application found it was well managed. Interviews with the person in charge demonstrated competency in the land application methods as well as mitigation action plans to prevent overflowing and spillages.</p>					
4.6 Principle 6: Best Practices							
Criterion 4.6.1: Mill Management							
4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>The estates and mill operations have a comprehensive set of Standard Operating Procedures (SOPs), prepared on a Group basis. Various levels and types of documentation are identified, each serving specific purposes. Among the SOP were:</p> <ul style="list-style-type: none"> a) Safe Operating Procedure dated 17/11/2021. b) Sustainability Management Procedure Manual dated 12/12/2023. c) Quality, Environmental, Safety & Health & Sustainability Manual – Dated 01/07/2017. d) Procedure Manual – Dated 02/01/2018. e) Environmental Control Procedure – Dated 01/09/2018. <p>These documents collectively form a structured framework for guiding and standardizing operations, ensuring compliance with</p>					Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		quality, environmental, safety, health, sustainability, and other relevant standards and procedures within the organization. Monitoring on Mill Performance was done on monthly basis. Refer Minutes of 16 th Dashboard Monthly Meeting dated 16/10/2023 and Minutes of 17 th Dashboard Monthly Meeting dated 16/01/2024.	
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	The mill process is monitored through shift supervision led by an Engineer/Executive. This involves documenting all process parameters and summarizing them in a daily report. External monitoring is conducted through visits, including those by the Senior Vice President (SVP) and the mill management team. This comprehensive monitoring approach ensures that the mill's operations adhere to established parameters and standards, and it allows for both internal and external assessments of the process.	Complied
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	The business plan for the mill is structured in the form of an annual budget, with a 5-year projection, serving as guidance for future planning. This plan encompasses production figures for Crude Palm Oil (CPO) and Palm Kernel (PK), as well as operational and maintenance costs, and Capital Expenditure (CAPEX). Similarly, the business or management plan for the Mill is presented through an annual budget with a 5-year projection. This budget includes crop projections and financial allocations for field operations, administration, and CAPEX. To maintain fiscal discipline, the management employs monthly progress reports and holds regular meetings to monitor expenditures, ensuring that the budget is not exceeded. This	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance										
		approach promotes financial accountability and strategic planning for both the mill and estates.											
Criterion 4.6.3: Transparent and fair price dealing													
4.6.3.1	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p>- Major compliance -</p>	<p>The management has engaged contractor and they are understanding the MSPO requirements. The management also provided the required documentation and information to contractor. Meanwhile the contractor also has signed contract agreement. Refer also in the contract agreement it was stated the term and condition for contractor including the price agreed. Sighted the evidence.</p> <p>Detail information on the contractor agreement:</p> <table border="1" style="width: 100%;"> <tr> <td>Document</td> <td>Contract Agreement</td> </tr> <tr> <td>Between</td> <td>Mill & Refinery</td> </tr> <tr> <td>Scope</td> <td>Buyer of CPO</td> </tr> <tr> <td>Reference</td> <td>SGMWM/CPO/2402/A04</td> </tr> <tr> <td>Price Mechanism</td> <td>Available state in Contract Agreement</td> </tr> </table> <p>Based on interview with the contractor, they are understanding on the term and condition in the contract agreement including the price agreed. There is no issue outstanding payment where is the payment is timely paid.</p>	Document	Contract Agreement	Between	Mill & Refinery	Scope	Buyer of CPO	Reference	SGMWM/CPO/2402/A04	Price Mechanism	Available state in Contract Agreement	Complied
Document	Contract Agreement												
Between	Mill & Refinery												
Scope	Buyer of CPO												
Reference	SGMWM/CPO/2402/A04												
Price Mechanism	Available state in Contract Agreement												
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>The management has engaged contractor and they are understanding the MSPO requirements. The management also provided the required documentation and information to contractor. The contractor also has signed contract agreement. Refer also in the contract agreement it was stated the term and</p>	Complied										

**MSPO Public Summary Report
Revision 2 (Nov 2021)**

Criterion / Indicator		Assessment Findings	Compliance														
		<p>condition for contractor including the price agreed. Sighted the evidence.</p> <p>Detail information on the payment to contractor:</p> <table border="1"> <tr> <td>Document</td> <td>Contract Agreement</td> </tr> <tr> <td>Between</td> <td>Mill & Transporter</td> </tr> <tr> <td>Scope of work</td> <td>CPO Transport</td> </tr> <tr> <td>Reference</td> <td>G470951</td> </tr> <tr> <td>Date</td> <td>30/11/2023</td> </tr> <tr> <td>Invoice Date</td> <td>31/12/2023</td> </tr> <tr> <td>Payment Date</td> <td>05/02/2024</td> </tr> </table> <p>Based on interview with the contractor, they are understanding on the term and condition in the contract agreement and there is No issue on outstanding payment where is the payment is timely paid.</p>	Document	Contract Agreement	Between	Mill & Transporter	Scope of work	CPO Transport	Reference	G470951	Date	30/11/2023	Invoice Date	31/12/2023	Payment Date	05/02/2024	
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Criterion 4.6.4: Contractor																	
4.6.4.1	<p>In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p>	<p>All contractors have been briefed on the MSPO requirements, with the management providing necessary documentation and information. Furthermore, the management has conducted training sessions for contractors to familiarize them with the rules of operations within the estate. This is to ensures that contractors are well-informed and compliant with MSPO standards, promoting sustainable practices across the organization's operations. Sighted the evidence:</p> <p>Detail information on the training to contractor:</p> <table border="1"> <tr> <td>Document</td> <td>Meeting External Stakeholder</td> </tr> <tr> <td>Date</td> <td>14/06/2023</td> </tr> </table>	Document	Meeting External Stakeholder	Date	14/06/2023	Complied										
Document	Meeting External Stakeholder																
Date	14/06/2023																

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance										
		Agenda	Explanation on rules safety & environment Explanation on complaint procedure & policies company Explanation on MSPO/RSPO/ISCC requirement											
		Training to contractor has done conducted and the explanation regarding on company policies, contract agreement, pay slip, requirement MSPO/RSPO, safety & environment.												
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	The management has engaged contractor and they are understanding the MSPO requirements. The management also provided the required documentation and information to contractor. The contractor also has signed contract agreement. Refer also in the contract agreement it was stated the term and condition for contractor including the price agreed. Sighted the evidence. Detail information on the payment to contractor: <table border="1" style="width: 100%; margin-top: 5px;"> <tr> <td>Document</td> <td>Contract Agreement</td> </tr> <tr> <td>Between</td> <td>Mill & Transporter</td> </tr> <tr> <td>Scope of work</td> <td>CPO Transport</td> </tr> <tr> <td>Reference</td> <td>G470951</td> </tr> <tr> <td>Term & Condition</td> <td>Include in Contract Agreement</td> </tr> </table>		Document	Contract Agreement	Between	Mill & Transporter	Scope of work	CPO Transport	Reference	G470951	Term & Condition	Include in Contract Agreement	Complied
Document	Contract Agreement													
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Reference	G470951													
Term & Condition	Include in Contract Agreement													
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	The management has accepted MSPO approved auditors to verify assessments through a physical inspection if required. During audit, the management had arranged the invitation stakeholder meeting which is the audit team will do a stakeholder meeting. During audit		Complied										

Criterion / Indicator		Assessment Findings	Compliance						
		<p>there is discussion and receiving data collection from the contractor. Sighted the evidence: Detail information on stakeholder consultation during audit:</p> <table border="1"> <tr> <td>Stakeholder 1</td> <td>SK Seri Maju Jaya</td> </tr> <tr> <td>Stakeholder 2</td> <td>CPO Transporter</td> </tr> <tr> <td>Stakeholder 3</td> <td>Ladang Singmah</td> </tr> </table>	Stakeholder 1	SK Seri Maju Jaya	Stakeholder 2	CPO Transporter	Stakeholder 3	Ladang Singmah	
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Stakeholder 2	CPO Transporter								
Stakeholder 3	Ladang Singmah								

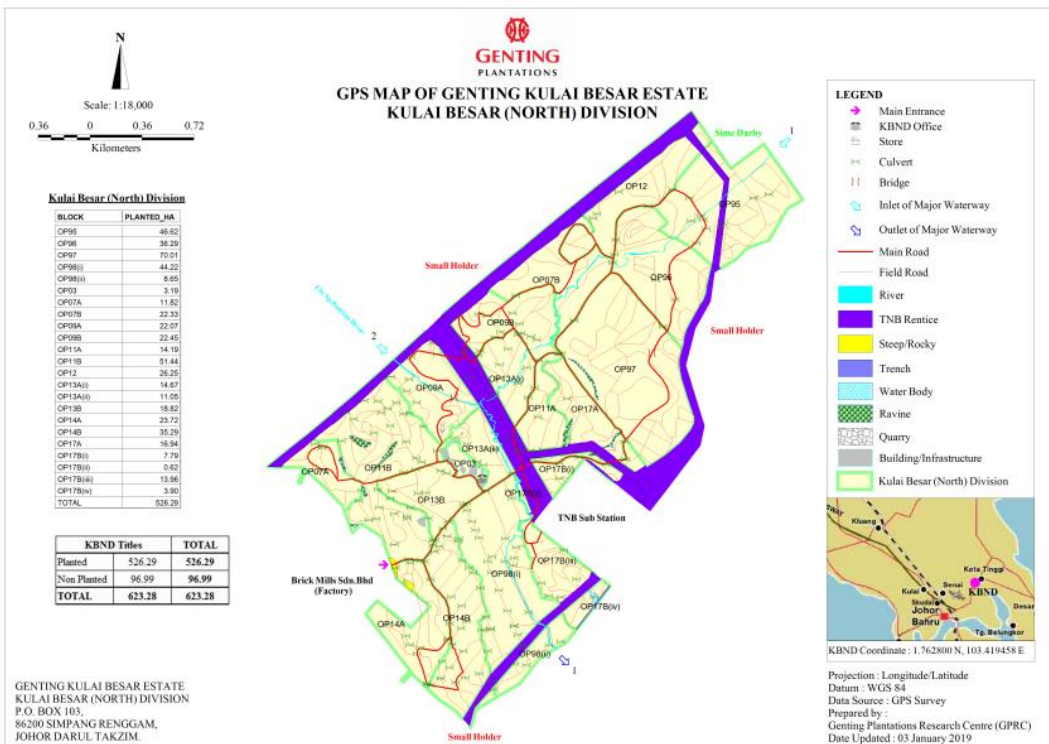
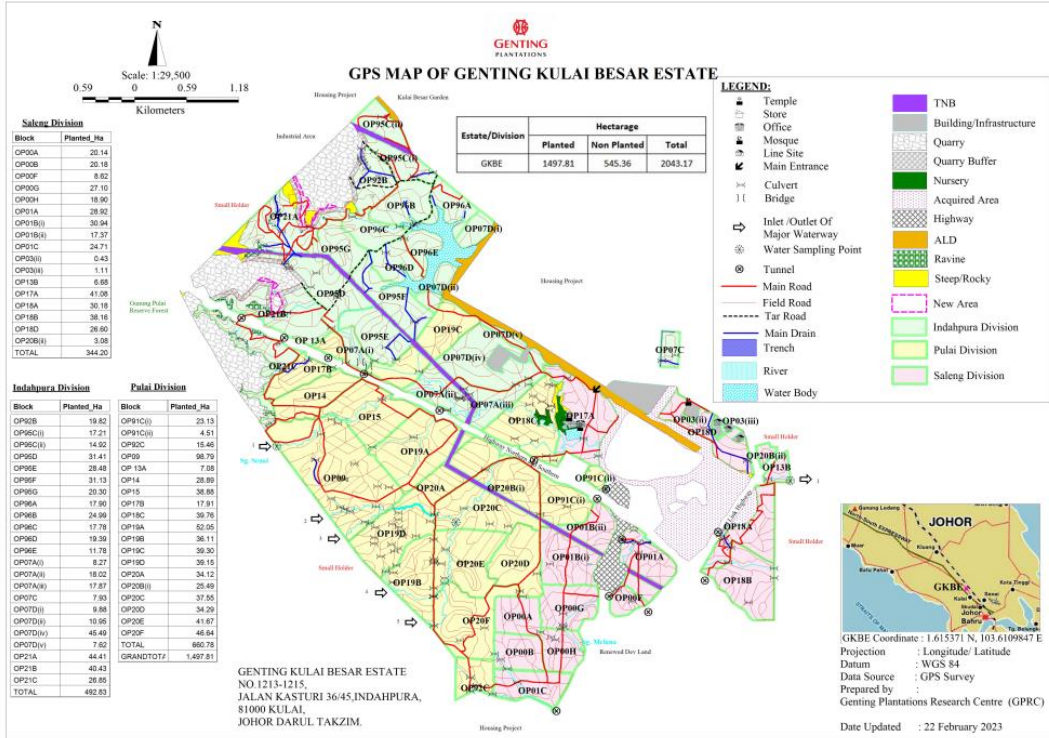
Appendix B: Smallholder Member Details

No.	Smallholder		Location of Planted Area (District)	GPS Coordinates		Certified Area (ha)	Planted Area (ha)
	Name	MPOB License Number		Latitude	Longitude		
	N/A						

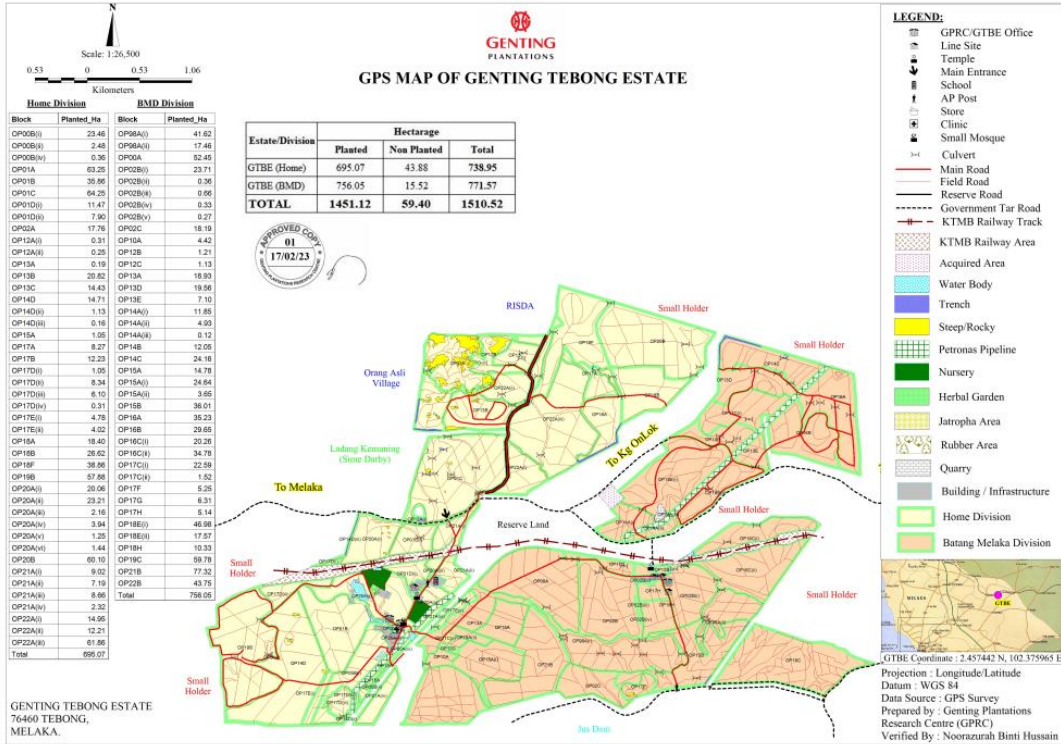
Appendix C: Location and Field Map

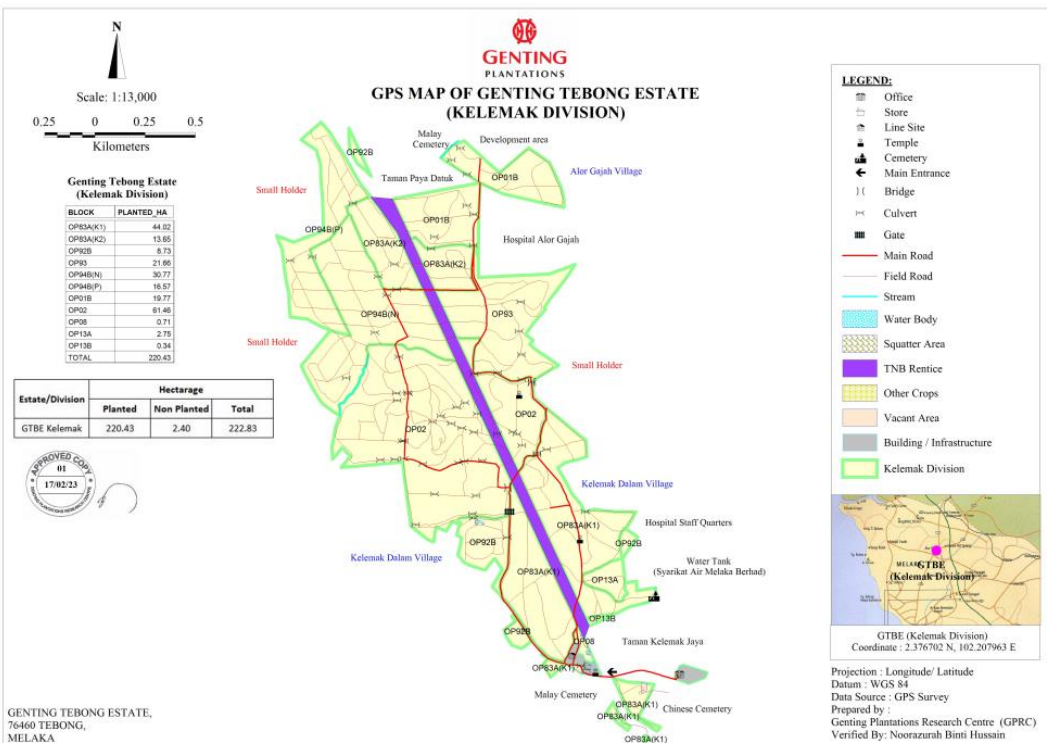
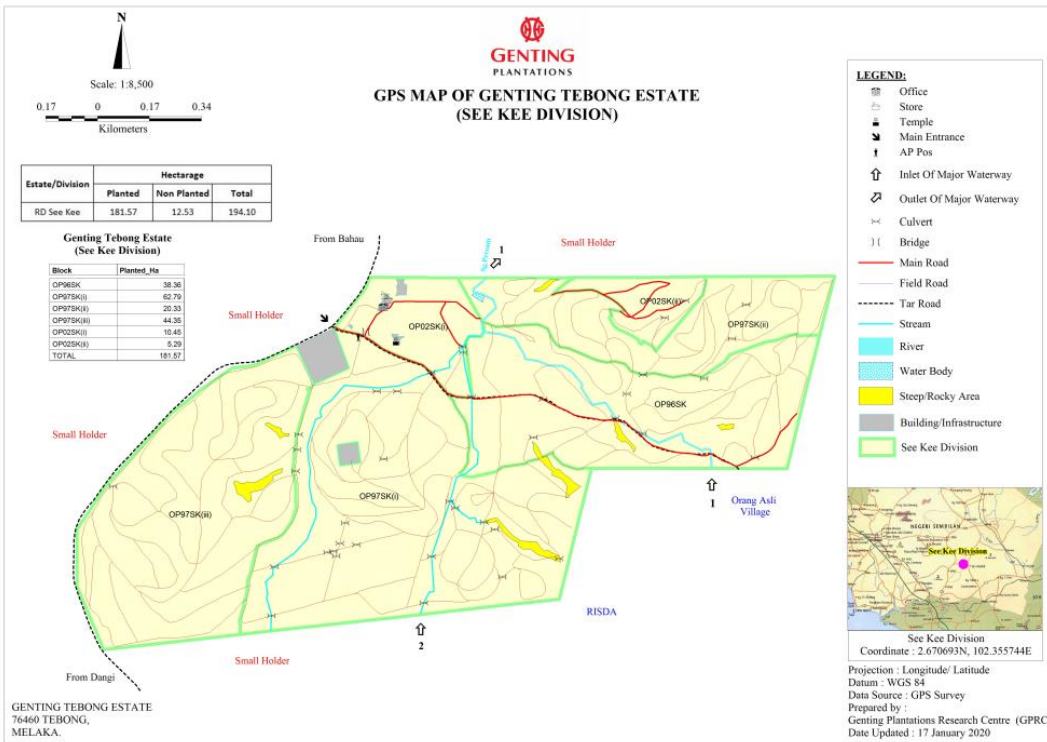


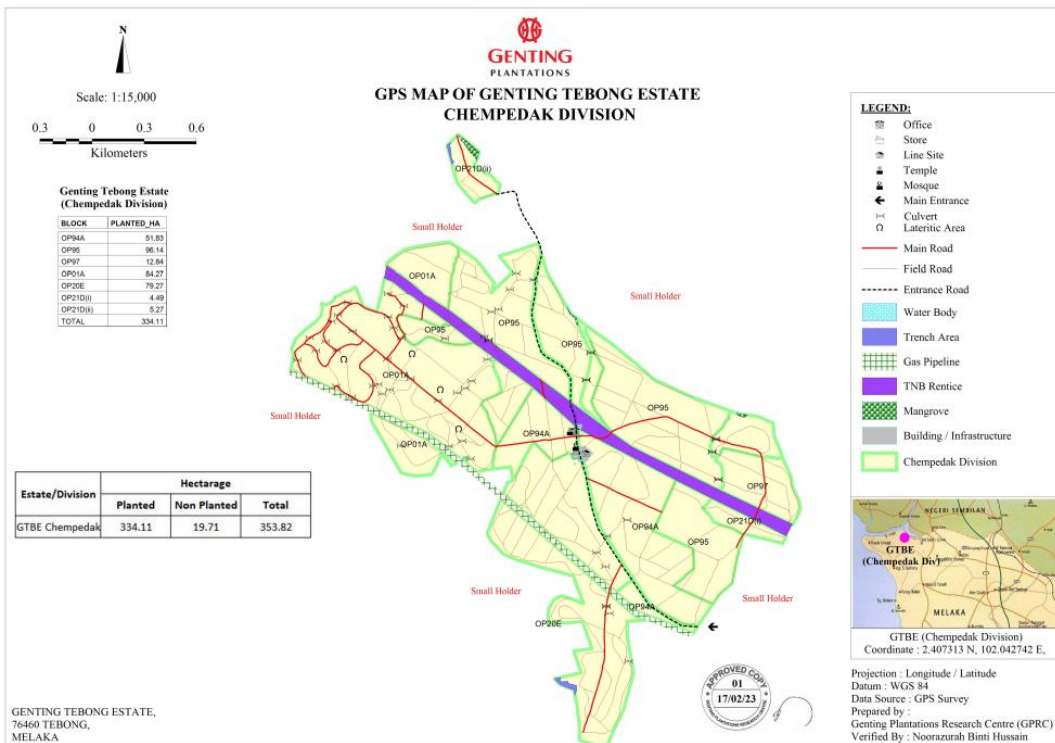
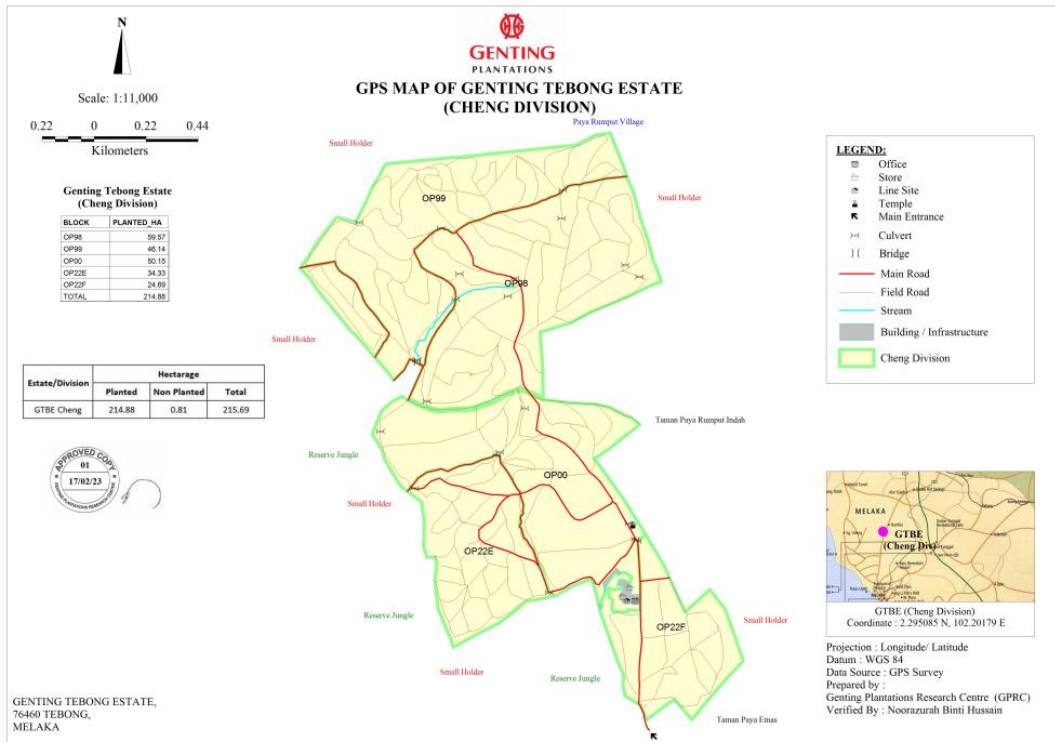
Genting Kulai Besar Estate



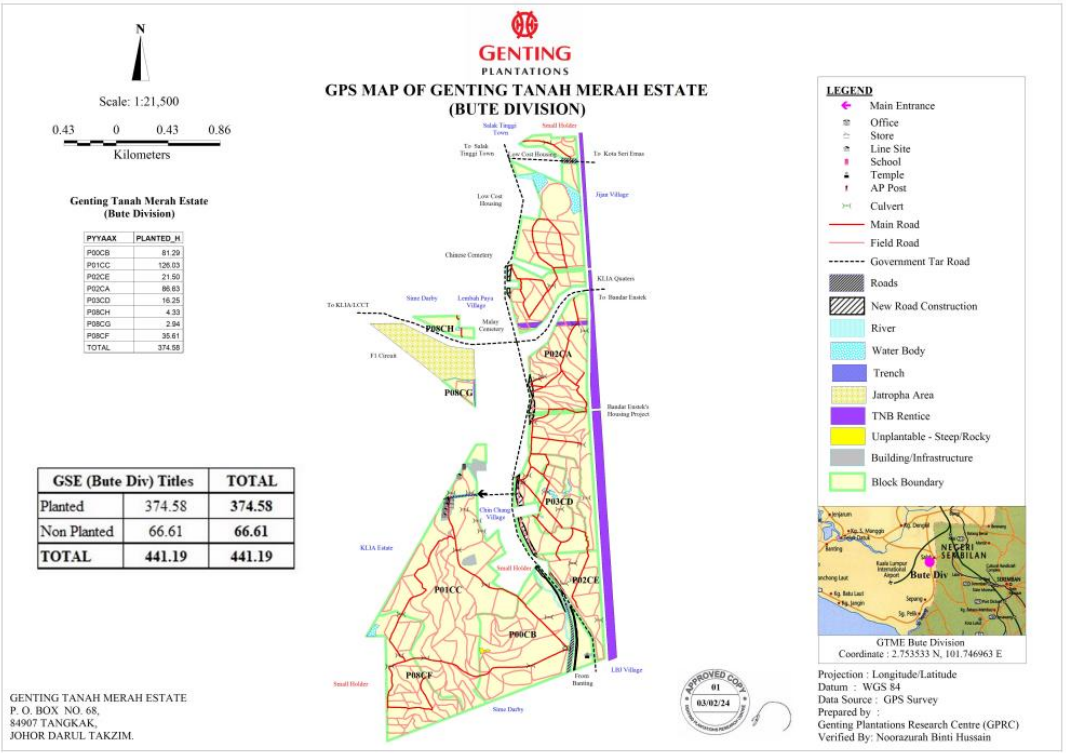
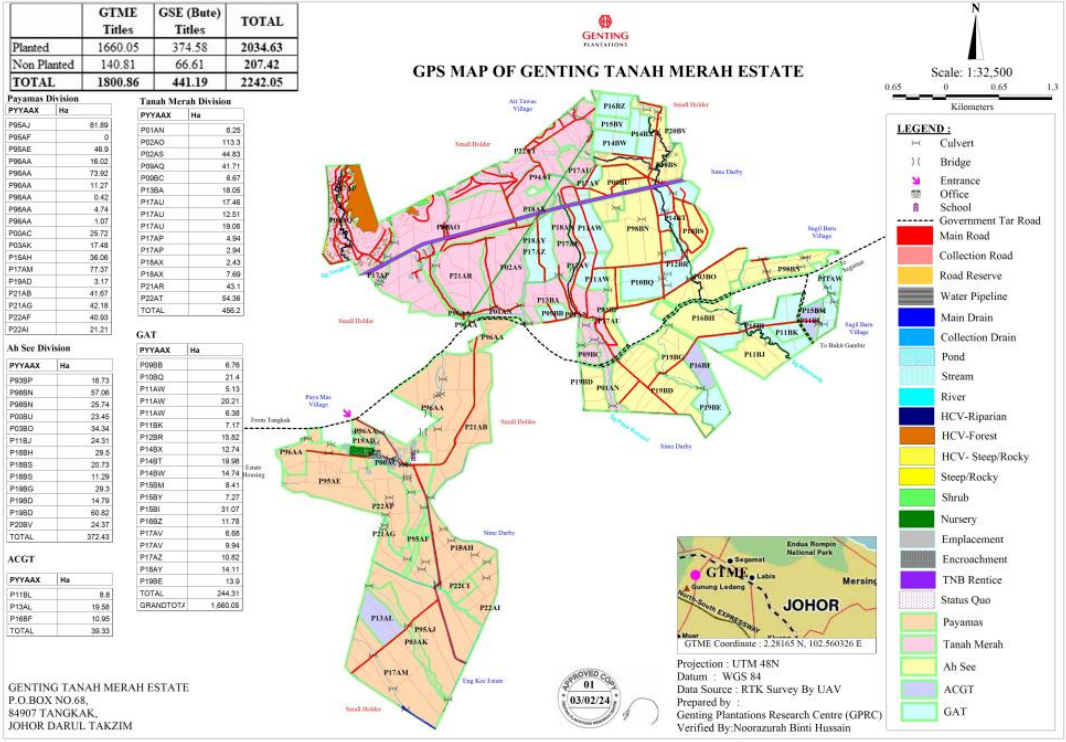
Genting Tebong Estate







Genting Tanah Merah Estate



Appendix D: List of Abbreviations

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MSPO	Malaysian Sustainable Palm Oil
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RTE	Rare, Threatened or Endangered species
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure