

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (ASA 3)**
- Recertification Assessment**
- Extension of Scope**

Client Company name (Parent Company): Genting Plantations Berhad
Client company Address: Genting Plantations Berhad 10th Floor, Wisma Genting Jalan Sultan Ismail 50250 Kuala Lumpur Malaysia
Certification Unit: Genting Bukit Sembilan Estate Location of Certification Unit: Kampung Batu Dua 09300 Kuala Ketil, Kedah, Malaysia

TABLE of CONTENTS

Page No

Section 1: Scope of the Certification Assessment.....	4
1. Company Details	4
2. Certification Information	4
3. Other Certifications.....	4
4. Location(s) of Mill & Supply Bases	5
5. Description of Supply Base	5
6. Plantings & Cycle.....	5
7. Certified Tonnage of FFB (Own Certified Scope)	5
8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *.....	5
9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable	6
10. Certified Tonnage	6
11. Actual Sold Volume (CPO)	7
12. Actual Sold Volume (PK)	7
13. Actual Group certification Claims	7
Section 2: Assessment Process	8
2.1 Assessment Methodology, Programme, Site Visits.....	8
2.2 BSI Assessment Team:	9
2.3 Assessment Plan	10
Section 3: Assessment Findings	13
3.1 Normative requirement applied for this assessment:.....	13
3.2 Time Bound Plan progress for multiple management units	13
3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)	15
3.4 Details of findings	15
3.4.1 Status of Nonconformities Previously Identified and Observations	20
3.4.2 Summary of the Nonconformities and Status.....	20
3.5 Stakeholders and previous land owner / user consultation	21
3.6 Impartiality and conflict of interest	22
Formal Signing-off of Assessment Conclusion and Recommendation Error!	Bookmark not defined.
Appendix A: Summary of Findings <i>include the appropriate checklist used for assessment</i>	24
Appendix B: Approved Time Bound Plan.....	81
Appendix C: GHG Reporting Executive Summary	87
Appendix D: Supply Chain Declaration.....	89

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

Appendix E: Location Map of Certification Unit and Supply bases..... 90
Appendix F: Estate Field Map 91
Appendix G: List of Smallholder Sampled (*If applicable – scheme/associated/group certification*) 92
Appendix H: List of Abbreviations 93

Section 1: Scope of the Certification Assessment

1. Company Details			
Parent Company	Genting Plantations Berhad		
RSPO Membership Number	1-0086-06-000-00	Membership Approval Date	14/11/2006
Address	10th Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Genting Plantations (WM) Sdn Bhd – Genting Bukit Sembilan Estate		
Location / Address	Kampung Batu Dua, 09300 Kuala Ketil, Kedah, Malaysia		
Website	http://www.gentingplantations.com/		
Management Representative	Mr Arunan Kandasamy	E-mail	arunan.kandasamy@genting.com
Telephone	+603 2333 6401 (Head office)	Facsimile	+603 2333 6575 (Head office)

2. Certification Information			
Certificate Number	RSPO 673953	Date of First Certification	18/09/2017
		Certificate Start Date	18/09/2017
		Certificate Expiry Date	17/09/2022
Scope of Certification	Production of Fresh Fruit Bunches		
Visit Objectives	The objective of the assessment was to conduct an assessment of the existing certification to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organisation's management system.		
Applicable Standards	<input type="checkbox"/> RSPO P&C 2018 with supply chain Module <input type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance <input checked="" type="checkbox"/> <i>Malaysia</i> National Interpretation 2019 for RSPO P&C 2018 with supply chain Module <input type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 682996	MSPO MS 2530-3:2013 – General Principles for Oil Palms Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	27/01/2024

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Genting Bukit Sembilan Estate	Ladang Bukit Sembilan, Kampung Batu Dua, 09300 Kuala Ketil, Kedah, Malaysia	5° 34' 35.04" N	100° 41' 9.57" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Bukit Sembilan Estate	1,180.06	2.15	51.95	1,234.16	95.62

6. Plantings & Cycle							
Estate	Age (Years) (ha)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Bukit Sembilan Estate	110.47	77.83	475.88	272.61	243.27	1,069.59	110.47

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (Sept 2019-Aug 2020)	Actual (July 2019 – June 2020)		Forecast (Sept 2020 – Aug 2021)
		<i>Previous license period (July – Aug 2019)</i>	<i>Current license period (Sept 2019-June 2020)</i>	
Genting Bukit Sembilan Estate	24,500.00 mt	5,949.61 mt	17,849.02 mt	23,500.00 mt

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *				
Estate	Tonnage / year			
	Estimated	Actual		Forecast
		<i>Previous license period (key in period covered)</i>	<i>Current license period (key in period covered)</i>	
N/A	N/A			N/A

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

Total			
Note: <i>Nil</i>			

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable				
Independent FFB Supplier	Tonnage / year			
	Estimated (key in period)	Actual (key in period)		Forecast (key in period)
		Previous license period (key in period covered)	Current license period (key in period covered)	
N/A				
Total				
Note: <i>Nil</i>				

10. Certified Tonnage				
	Estimated (Sept 2019-Aug 2020)	Actual (July 2019 – June 2020)		Forecast (Sept 2020 – Aug 2021)
	FFB	FFB		FFB
Mill Capacity: XX MT/hr (n/a)	24,500.00 mt	Previous license period (July – Aug 2019)	Current license period (Sept 2019-June 2020)	23,500.00 mt
SCC Model: IP		5,949.61 mt	17,849.02 mt	
	CPO (OER:20.5%)	CPO (OER:20.5%)		CPO (OER:20.5%)
	5,022.50 mt	4,878.72 mt		4,817.50 mt
	PK (KER:5.5%)	PK (KER:5.5%)		PK (KER:5.5%)
	1,347.50 mt	1,308.92 mt		1,292.50 mt
Note: <i>Nil</i>				

11. Actual Sold Volume (CPO)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)					
Previous License period					
CPO (MT)					
12. Actual Sold Volume (PK)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)					
Previous License period					
PK (MT)					

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO		
IS-CSPKO		
IS-CSPKE		

Section 2: Assessment Process

Certification Body:

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

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site 3rd annual surveillance assessment was conducted from 14-15/7/2020. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out off-site assessment was conducted on 6/9/2020. Due to the movement restriction from government, the onsite assessment to close the Major NC was not able to be conducted. All the evidences of closing the Major NC were reviewed online and interview session were conducted through Microsoft Teams

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criterias 2018 (MYNI 2019) and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

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

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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

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

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

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

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

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

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

Assessment Program						
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)	
Genting Bukit Sembilan Estate	√	√	√	√	√	

Tentative Date of Next Visit: July 14, 2021 – July 15, 2021

Total No. of Mandays: 6 mandays

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Muhamad Naquiuddin Mazeli	Team Leader	He graduated with Bachelor of Science Horticulture at University Putra Malaysia. He started his career in 2009 as Researcher at Sime Darby Research Seed Centre and manage for Quality control for seed production for paddy, chilli and corn with collaboration with Malaysian Agricultural Research and Development Institute (MARDI) for 4 years. During the period, he was also involved with Nestle project on Red Rice production. He later joins the Sime Darby Plantation Berhad Sustainability Team in 2013 as Sustainability

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

		Executive. Joining the sustainability team, he managed, implemented and monitored the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training and internal audits related to RSPO, MSPO and other certifications where applicable to the operations within Sime Darby Plantation. He is a trained Safety Officer and he managed the Occupation Safety and Health of Northern Region Sime Darby Plantation Berhad operations. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health and workers consultation.
Nicholas Cheong	Team Member	Holds a Master of Environmental Management from the University Putra Malaysia and Bachelor of Science (Food Science) from Charles Sturt University Australia. He has more than 7 years of working experience in sustainability auditing for palm oil industry and hydropower plant. He is also an expert in Greenhouse Gas emissions accounting. He has also 2 years of working experience in wastewater treatment and operations. He has completed the ISO9001, ISO14001, RSPO P&C Lead Auditor course, RSPO Supply Chain Lead Auditor Course, RBA Labor & Ethic Lead Auditor Course and MSPO Awareness Training. In his previous certification body, he was a Lead Assessor for Clean Development Mechanism, World Commission of Dam and ISCC. He had been involved in Sustainable Palm Oil auditing for more than 5 years. In this assessment, the focus element includes legal requirements, social and workers welfare, workers health and safety and supply chain. He is fluent in both verbal/written in English.
Ragu Samy A/L Erulappan	Team Member	Ragu Erulappan is a fulltime employee with BSI Services Malaysia. He graduated from University Technology Malaysia. He attended internal RSPO training in 22 December 2014. He has completed ISO 9001:2008 Quality Management System Lead Auditor training, ISO 14001, ISO 18001 Lead Auditor Training. Currently he is an ISO 9001:2008, ISO 14001, ISO 18001, C-TPAT (Supply Chain Security) and GDPMD (Good Distribution Practice for Medical Devices) Lead Auditor. He has more than 5 years of auditing experience since August 2010 covering Environment, Safety and Health, Legal aspects in various industries. He is involved as Environment, Safety and Health Auditor during the RSPO Assessment. For this assessment he assesses Mill and Estate OSH, best practices and legal aspects. He is able to speak and understand Bahasa Malaysia, English and Tamil.

Accompanying Persons:

Name	Role
Hu Ning Shing	Qualifying Reviewer

2.3 Assessment Plan

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

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

Date	Time	Subjects	MN	NC	RS
Sunday, 12/07/2020		Travel to The Purest Hotel and check in Hotel.	√	√	
Monday, 13/07/2020					√
Tuesday, 14/07/2020	0830-0900	Genting Bkt Sembilan Estate: Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). 	√	√	√
	0900–1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	1230–1330	Lunch	√	√	√
	1330–1700	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/ workers representatives, new planting, CIP and implementation etc). <ul style="list-style-type: none"> • 	√	√	√
	1700–1730	Interim Closing Briefing	√	√	√
Wednesday 15/7/2020	0830–1000	Genting Bkt Sembilan Estate: Continue documentation review/site visit.	√	√	√

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

Date	Time	Subjects	MN	NC	RS
		Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		√	
	1000-1100	Verify any outstanding issues & Preparation for closing meeting	√	√	√
	1100-1230	Closing meeting	√	√	√
	1230-1700	Travelling Back	√	√	√

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Genting Plantations Berhad Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- Malaysia National Interpretation 2019 for RSPO P&C 2018
- Independent Smallholder Standard 2019

3.2 Multiple Management Units and Time Bound Plan

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	Yes, All subsidiaries, estates, mills and refinery except those estates (landholdings) planned to be developed into property development (West Malaysia)	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	The first oil mill and its supply bases were certified in 2015. As per Feb 2020, the mill and estate was certified as per TBP.	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No new acquisition as of February 2020.	Yes
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No. The group’s target for 100% certification of own estates and mills remains at 2023. The group is in progress to obtain HGU for the remaining concessions.	Yes
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No lapses however re-scheduling of the certification dates has been made.	Yes
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	None	Yes
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	<u>Sabah</u> 1.Genting Kencana Estate – LUCA passed, Concept Note for Remediation and Compensation submitted to Panel. Concept Note under revision and to be re-submitted to the Panel in 1Q 2020. <u>Indonesia</u>	Yes

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

	<p>1. PT SISM – LUCA passed. Concept Note and Remediation Plan submitted and approved by Panel.</p> <p>2. PT GAL – LUCA under review by RSPO.</p>																			
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	NPP for PT PALJ, PT AAC, PT UAI, PT SMA, PT KIU are in progress.	Yes																		
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</p>	<p>No new complaint. Latest was on 2016, Based on the following: http://www.rspo.org/members/complaints/statusof-complaints/view/38 Complaints officially closed on 31 October 2016. From the update, RaCP status as per below:-</p> <table border="1" style="width: 100%;"> <thead> <tr> <th>Unit</th> <th>RaCP status</th> <th>LUCA report status</th> </tr> </thead> <tbody> <tr> <td>PT Globalindo Agung Lestari</td> <td>Ongoing</td> <td>In progress (Clarification process)</td> </tr> <tr> <td>PT Sepanjang Inti Surya Mulia</td> <td>Completed</td> <td>Completed</td> </tr> <tr> <td>PT Agro Abadi Cemerlang</td> <td>Completed</td> <td>Completed</td> </tr> <tr> <td>Genting Jambongan Estate (GJBE)</td> <td>Ongoing</td> <td>Completed</td> </tr> <tr> <td>Genting Kencana Estate (GKCE)</td> <td>Ongoing</td> <td>Completed</td> </tr> </tbody> </table>	Unit	RaCP status	LUCA report status	PT Globalindo Agung Lestari	Ongoing	In progress (Clarification process)	PT Sepanjang Inti Surya Mulia	Completed	Completed	PT Agro Abadi Cemerlang	Completed	Completed	Genting Jambongan Estate (GJBE)	Ongoing	Completed	Genting Kencana Estate (GKCE)	Ongoing	Completed	Yes
Unit	RaCP status	LUCA report status																		
PT Globalindo Agung Lestari	Ongoing	In progress (Clarification process)																		
PT Sepanjang Inti Surya Mulia	Completed	Completed																		
PT Agro Abadi Cemerlang	Completed	Completed																		
Genting Jambongan Estate (GJBE)	Ongoing	Completed																		
Genting Kencana Estate (GKCE)	Ongoing	Completed																		
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No any labour disputes occur.	Yes																		
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Based on the following: https://askrspo.force.com/Complaint/s/casetracker No any legal non-compliance occur.	Yes																		
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes, The Internal audit was conducted for uncertified units on periodical basis by Sustainability Team. Internal audit report indicated the positive assurance has been produced.	Yes																		
Have there been any stakeholder (including NGO) consultation conducted?	To-date, no comments received from stakeholders on the TBP.	Yes																		

3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

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

3.4 Details of Nonconformities

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

During this Assessment there were 4 Critical (Major); 2 Minor nonconformities and 2 Opportunity For Improvement raised. The Genting Bukit Sembilan Estate Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	1933881-202007-M1	Clause & Category (Major / Minor)	2.1.1 [Critical (Major)]
Date Issued	15/7/2020	Due Date	12/10/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	06/09/2020
Statement of Nonconformity:	Found the CU inadequately comply with legal requirements		
Requirement Reference:	(C) The Unit of Certification complies with legal requirements		
Objective Evidence:	1. Sighted Diesel storage in Paya Kamunting Div without license for buy and kept as per requirement Control Of Supplies Act 1961 2. No record of Scheduled waste for PPE disposal (SW 410) on August 2019 however found issuance of rubber and glove for sprayer and manuring team on August 2019. This not comply with Safety and Health Manual (OM-GPB-02; 1/1/2010) The used PPE must bring for exchange with new PPE and the used PPE must be disposed as scheduled waste and also not comply with EQA 1974(Scheduled waste regulation 2005)		
Corrections:	1. To apply for diesel license for the outlying division (Paya Kamunting Div)		

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

	2. To update the Aug 2019 – SW 410 inventory accordingly.
Root Cause Analysis:	<p>1. The outlying division license was missed to be included in the LRR/license list, due to misunderstanding that the diesel license of main division (Bukit Sembilan Div) is adequate as long as the management complies with the total volume as stated in the license.</p> <p>2. Inadequate training as the staff misunderstood that small quantities of SWs not required to be recorded on the same month.</p>
Corrective Actions:	<p>1. To include all outlying division license in the LRR/license list, and continuously check and verify if any other 'individual division' legal compliances are required.</p> <p>2. Provide training to the relevant staff to ensure all SWs are inventoried although small in quantity.</p>
Assessment Conclusion:	<p>As per document review as per below:-</p> <p>1: (a) Diesel licence / application details. (b) License list</p> <p>2: (a) Aug 2019 – SW 410 inventory (b) Training record on SWs inventory and management</p> <p>Evidence shown consistency of implementation of the corrective action and verified effective to address the issue. Hence, Major NC was closed on 6/9/2020 since evidence provided sufficient for off-site verification.</p> <p>This Justification is according to off-site verification due to Movement Control Order (MCO) cause by N-Covid virus issue.</p>

Non-conformity			
NCR Ref #	1933881-202007-M2	Clause & Category (Major / Minor)	6.7.3 [Critical (Major)]
Date Issued	15/7/2020	Due Date	12/10/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	6/9/2020
Statement of Nonconformity:	PPE compliance was not fully adequate.		
Requirement Reference:	(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Objective Evidence:	A harvesting worker was found wearing short pants during at work. This was not as per requirement to the Clause 2.1 PPE compliance of wearing thick and long – jeans/khakis as stated in Harvesting Procedure, Doc. No. SOP-GBSE-11, Latest Update: 27/06/2020		
Corrections:	Refresher training on PPE compliance was conducted to the target harvesters group. The harvesters also advised to to keep extra pants to use if the existing pants are torn/wet.		

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

Root Cause Analysis:	Inefficient monitoring on PPE compliance by estate management personnel during muster call because only 'visual' observation being practiced (without checklist), which cause some workers missed from being checked properly.
Corrective Actions:	Implement daily PPE compliance checklist by the mandore/staff.
Assessment Conclusion:	As per document review as per below:- 1. Training record 2. PPE compliance checklist Evidence shown consistency of implementation of the corrective action and verified effective to address the issue. Hence, Major NC was closed on 6/9/2020 since evidence provided sufficient for off-site verification. This Justification is according to off-site verification due to Movement Control Order (MCO) cause by N-Covid virus issue.

Non-conformity			
NCR Ref #	1933881-202007-M3	Clause & Category (Major / Minor)	4.1.1 [Critical (Major)]
Date Issued	15/7/2020	Due Date	12/10/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	6/9/2020
Statement of Nonconformity:	The policy is not yet finalized		
Requirement Reference:	A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.		
Objective Evidence:	The policy on prohibiting retaliation against Human Rights Defenders (HRD) is not yet established and implemented.		
Corrections:	To liase with top management to get the policy approved by 31st Aug 2020.		
Root Cause Analysis:	The draft policy with inclusion of HRD elements was prepared (by Sustainability Department) and available since Feb 2020. However, the approval by top management was delayed due to Covid19/MCO as unable to conduct physical meeting.		
Corrective Actions:	In the event unable to conduct physical meeting, SD (Sustainability Dept) to arrange online meeting/discussion with top management for discussion on new company policies.		
Assessment Conclusion:	As per document review as per below:- 1. Approved 'Social Policy' with inclusion of HRD elements 2. Circulation memo Evidence shown consistency of implementation of the corrective action and verified effective to address the issue. Hence, Major NC was closed on 6/9/2020 since evidence provided sufficient for off-site verification. This Justification is according to off-site verification due to Movement Control Order (MCO) cause by N-Covid virus issue.		

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

Non-conformity			
NCR Ref #	1933881-202007-M4	Clause & Category (Major / Minor)	6.2.3 [Critical (Major)]
Date Issued	15/7/2020	Due Date	12/10/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	6/9/2020
Statement of Nonconformity:	Minimum wages not achieved and payment was not according to the MAPA/NUPW Field and Other general employees and fringe benefits agreement 2019 Article 8.		
Requirement Reference:	There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.		
Objective Evidence:	Minimum wage for worker Basak Kanak Kumar (Grabber driver) was not achieved during low crop months i.e. November 2019 and no top-up despite he has met his productivity. Furthermore, the worker was moved from harvesting operation to piece rate work and no SGP was paid.		
Corrections:	To top up the worker's wage and SGP accordingly (for the month of Nov 2019) in his Jul 2020 payslip.		
Root Cause Analysis:	The worker name did not appear in the 'list to top up' because 3 days were marked as 'uncompleted days'. Details as follows: Wages = RM906.19 + SGP = RM76.90; Total = RM983.09 Worked = 26days, Uncompleted = 3 days; Total actual days worked = 23 days So, minimum wages per day = RM983.09/23 days = RM42.74 System compare the earned RM42.74, with legal minimum wage/day = RM42.31, and conclude that the worker had met minimum wage, therefore not required to be topped up.		
Corrective Actions:	To monitor workers productivity daily and maintain the records properly to ensure accuracy when deciding their completed days.		
Assessment Conclusion:	As per document review as per below:- 1. Payslip of Kanak Kumar for Jul 2020 / Payment Voucher 2. Training to field staff and office personnel Evidence shown consistency of implementation of the corrective action and verified effective to address the issue. Hence, Major NC was closed on 6/9/2020 since evidence provided sufficient for off-site verification. This Justification is according to off-site verification due to Movement Control Order (MCO) cause by N-Covid virus issue.		

Non-conformity			
NCR Ref #	1933881-202007-N1	Clause & Category (Major / Minor)	7.12.7 (Minor)
Date Issued	15/7/2020	Due Date	Next Surveillance
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	Found RTE monitoring was inadequately implemented		

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

Requirement Reference:	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.
Objective Evidence:	1. The Identification of RTE species was available under HCV report (12.6 Appendix VI Inventory of Flora and Fauna at Genting Bukit Sembilan estate; Table 2: List of Fauna), however not included Malayan Pit Viper in identification record. 2. No monitoring of RTE species in Bukit Sembilan estate for year 2019 and 2020, last RTE species monitoring dated 6/12/2018
Corrections:	To re-activate the RTE monitoring checklist, and carry out the monitoring at least 4 months once. Provide training to the relevant workers and field staff.
Root Cause Analysis:	1. Misunderstood that only RTE species which were listed in the earlier HCV report to be monitored. 2. Misunderstood that RTE species monitoring no longer required after re-classification of the forest strip from HCV 1.4 to non-HCV (conservation set aside) in 2018.
Corrective Actions:	To include the RTE species monitoring/checklist into the annual sustainability programme. To include training on RTE species monitoring into the estate's annual training programme.
Assessment Conclusion:	Corrective action plan accepted on 19/8/2020. Evidence of its effectiveness to be verified in next assessment.

Non-conformity			
NCR Ref #	1933881-202007-N2	Clause & Category (Major / Minor)	3.5.1 (Minor)
Date Issued	15/7/2020	Due Date	Next Surveillance
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	Employment procedure for foreign labors is not finalized.		
Requirement Reference:	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.		
Objective Evidence:	The recruitment procedure for Foreign labour is not yet finalized and not yet available to be implemented.		
Corrections:	To liase with top management to get the procedure approved by 31st Aug 2020.		
Root Cause Analysis:	The draft procedure which was initially prepared in 2018, was updated again in early 2020 to include some latest requirements as per MYNI 2019. However, the approval by top management was delayed due to Covid19/MCO as unable to conduct physical meeting.		
Corrective Actions:	In the event unable to conduct physical meeting, SD (Sustainability Dept) to arrange online meeting/discussion with top management for discussion on new/amended company procedures.		

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

Assessment Conclusion:	Corrective action plan accepted on 19/8/2020. Evidence of its effectiveness to be verified in next assessment
-------------------------------	---

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>1933881-202007-I1 <u>Indicator 3.4.2</u></p> <p>The SEIA , social and environmental management and monitoring plans need to be improved and need also to include issue been raised by the stakeholder or workers in other Division estate.</p>
OFI 2	<p>1933881-202007-I2 <u>Indicator 6.1.5</u></p> <p>Further improvement can be made to identify the type of awareness program to improve women knowledge and opportunities.</p>

Positive Findings	
PF #	Description
PF 1	Good commitment from the management team
PF 2	Good hospitality provided for the audit team

3.4.1 Status of Nonconformities Previously Identified and Observations

N/A

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1502868-201707-M1	Major	5.1.1	13/07/2017	Closed out on 24/07/2017
1652689-201806-M1	Major	2.1.1	26/07/2018	Closed out on 6/9/2018
1652689-201806-M2	Major	6.5.2	26/07/2018	Closed out on 6/9/2018
1652689-201806-N1	Minor	5.2.4	26/07/2018	Closed out on 25/7/2019
1652689-201806-N2	Minor	5.4.1	26/07/2018	Closed out on 25/7/2019
1933881-202007-M1	[Critical (Major)]	2.1.1	15/7/2020	Closed on 6/9/2020
1933881-202007-M2	[Critical (Major)]	6.7.3	15/7/2020	Closed on 6/9/2020
1933881-202007-M3	[Critical (Major)]	4.1.1	15/7/2020	Closed on 6/9/2020

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

1933881-202007-M4	[Critical (Major)]	6.2.3	15/7/2020	Closed on 6/9/2020
1933881-202007-N1	Minor	7.12.7	15/7/2020	Open
1933881-202007-N2	Minor	3.5.1	15/7/2020	Open

3.5 Stakeholders and previous land owner / user consultation

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

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

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

List of Stakeholders contacted	
<p>Internal/External Stakeholders Kuala Bakong Village Padang Geh Village Estate Manager, Stothard Estate Workers representative Hospital Assistant Sprayer</p>	<p>Union/Contractors NUPW Kedah Branch</p>
<p>Government Departments Nil</p>	<p>NGO Nil</p>

Stakeholders comment	
1	<p>Feedbacks: Kuala Bakong Village / Smallholders There were no negative comment received from the village representative. The villagers has no issue on access. The village representative understood that there is a complaint mechanism implemented by the certificate holder.</p>
	<p>Management Responses: Noted on stakeholder’s comment</p>
	<p>Audit Team Findings:</p>

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

	Despite there were no negative comments from the village, the assessment team has raised an OFI against 3.4.2
2	Feedbacks: NUPW Kedah Branch There were no negative comment received from the NUPW Secretariat of Kedah Branch. They have received good operation from the certificate holder. There were no reports that the certificate holder is preventing workers from joining the union.
	Management Responses: Noted on stakeholder's comment
	Audit Team Findings: No further issue
3	Feedbacks: Padang Geh Village / Smallholders There were no negative comment received from the village representative. The villagers has no issue on access. The village representative acknowledge that they have invited for stakeholder meeting previously.
	Management Responses: Noted on stakeholder's comment
	Audit Team Findings: Despite there were no negative comments from the village, the assessment team has raised an OFI against 3.4.2

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
N/A					

Assessor Notes:
The land was open since 1980 and the planting for oil palm already ongoing 2 cycle.

Previous land owner / user comment	
Nil	Feedbacks:
	Management Responses:
	Audit Team Findings:

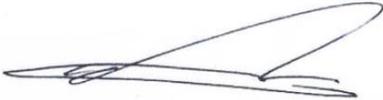
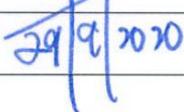
3.6 Impartiality and conflict of interest

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

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Genting Bukit Sembilan estate has complied with the RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Genting Bukit Sembilan estate is continued.

Report prepared by	Acceptance of Assessment Conclusion
Name: Muhamad Naquiuddin Mazeli	Name: Arunan Kandasamy
Company Name: BSI Services (M) Sdn Bhd	Company Name: Genting Plantations Berhad
Title: Client Manager	Title: SVP-Plantation (Malaysia)
Signature: 	Signature: (I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.) 
Date: 23/9/2020	Date: 

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations has established the Procedures on Request and Responses rev 0 dated 14/08/2014 to manage respond to the information requested by stakeholders. The information that can be requested includes – Company annual report; Group policies; Report related to EAI, EIA; External audit reports; Pollution prevention plan; continuous improvement plan; negotiation and compensation procedure; and sexual harassment procedure.</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>There was no such request recorded since the last assessment. There was 1 request in 2017 from nearby community requested for the estate’s land title to verify the land area.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>There was no such request recorded since the last assessment.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>The Procedure for Consultation and Communication rev 02 dated 23/02/2018 was developed for effective internal and external communication and responding to communications from local communities and other affected or interested parties.</p> <p>The nominated representative of Bukit Sembilan estate is Mr Anwar Bin Mat Ghani, Senior Assistance Manager dated 26/06/2020.</p> <p>Interview with stakeholders confirms that the procedures are communicated.</p>	Complied

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>The current stakeholder list includes stakeholders of the nearby communities, authorities department, trade union and suppliers.</p> <p>The stakeholder list could be improved to include other indirect stakeholders such as Wildlife department, forestry department, surrounding/related NGOs, SOCSO and EPF.</p>	OFI
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>The Ethical Conduct and Integrity Policy established on 22/06/2015 was replaced with Code of Conduct and Ethics for Employees and Directors dated 01/06/2020. All employee within Genting Plantations Group is adhere to follow the policy.</p> <p>The code of conduct is operated in conjunction with Whistle-blower policy revised on 01/06/2020 and Anti-Bribery & Corruption System Policy dated 01/06/2020.</p> <p>Policy training provided to harvesting contracted dated 18/06/2020 was sighted. Interview with the labour supplier contract confirmed he had been briefed on the company policies.</p>	Complied
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>Internal audit for RSPO requirements and financial implementation is conducted annually to ensure the business practices is implemented. The last RSPO internal audit was conducted on 07-08/07/2020 while the finance internal audit was conducted on 16/10/2019.</p> <p>Sample of ramp repairing work dated 11/05/2020 was verified. The contract was awarded base on quotation.</p>	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			

<p>2.1.1</p>	<p>(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -</p>	<p>Genting Bukit Sembilan Estate had continued to comply with the legal requirements applicable to its operation as identified in the Legal Requirements Register, Doc. No. SMP-GPB-22 last updated on 16/3/2020. Compliance to each applicable law and regulation is monitored by the operating units and the sustainability team. Genting Bukit Sembilan had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were:</p> <ul style="list-style-type: none"> a) MPOB license No. 508759002000 valid until 31/05/21 for "Menjual dan Mengalih". b) Diesel Storage Permit, S/N P: K003304, Diesel Quantity: 5500 Litre, permit valid until 05/08/20 c) Certificate of Fitness for Air Receiver, KD PMT 4993, valid until 29/09/20. d) Certificate of Fitness for Air Receiver, KD PMT 4621, valid until 04/03/21. e) Occupational Health Doctor, Reg. No. HQ/12/DOC/00262 valid until 28/02/21. f) License to Possess Arms and Ammunition, License No. 282153 valid until 30/06/21. <p>However sighted :-</p> <ul style="list-style-type: none"> 1. Diesel storage in Paya Kamunting Div without license for buy and kept as per requirement Control Of Supplies Act 1961. <p>1. No record of Scheduled waste for PPE disposal (SW 410) on August 2019 however found issuance of rubber and glove for sprayer and manuring team on August 2019. This not</p>	<p>Non-compliance</p>
--------------	---	---	-----------------------

		<p>comply with Safety and Health Manual (OM-GPB-02; 1/1/2010) The used PPE must bring for exchange with new PPE and the used PPE must be disposed as scheduled waste and also not comply with EQA 1974(Scheduled waste regulation 2005).</p> <p>Thus Major Non Conformity been raised under this indicator.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Genting Bukit Sembilan Estate continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that are applicable to the CU operation. Details of compliance were evaluated once a year as per in Legal Requirements Register, Doc. No. SMP-GPB-22 last updated on 16/3/2020.</p> <p>The Legal Register includes Occupational Safety and Health Act 1994, Pesticide Act 1974, Environmental Quality Act 1974, Occupational Safety and Health (Noise Exposure) Regulations 2019 and other related legal requirements.</p> <p>Tracking system to identify changes in the relevant regulations is available through the head office, website information and is communicated. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operation. Tracking system on any changes in the law had been well implemented.</p>	Complied
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>GBSE established a Boundary Stone Maintenance and Management Programme; Dated 26/6/2019. Programmes included replace missing stones, repainting & numbering, patrolling and etc.</p>	Complied
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

2.2.1	A list of contracted parties is maintained. - Minor compliance -	List of contractors including foreign labour agency are available. Copies of agreement are retained. The list of contractors are maintained according to the stakeholders list.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	This certification is a single estate certification. There is no purchase of FFB. Sample contract of NAG Supply & Services dated 01/06/2020 was sighted and clause related to meeting Malaysian Legal requirements are available in the terms and conditions.	Complied
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. - Minor compliance -	Sample contract of NAG Supply & Services dated 01/06/2020 was sighted and it has included clause of no minor below 18 years old shall be hired; workers have to be provided with fair legal contracts; and shall not practice any kind of discrimination or forced labour.	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	(C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license - Critical (Major) compliance -	GBSE was a single estate, Not applicable	Not Applicable
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1. - Minor compliance -	GBSE was a single estate, Not applicable	Not Applicable

Principle 3: Optimise productivity, efficiency, positive impacts and resilience																			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.																			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>In GBSE, 4 year management plan the annual budget with projection is available covering a period from 2020-2023 that specifies the activities/elements. Sighted the latest GBSE Summary of Capital Expenditure Costs for Fiscal Year 2020 (01/01/2020 to 31/12/2020). Sighted part of the approved CAPEX.</p>	Complied																
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>Annual replanting programme was available at estates which included the 5 years projection. The programme are as follows:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Area (Ha)</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>83.02</td> </tr> <tr> <td>2022</td> <td>0</td> </tr> <tr> <td>2023</td> <td>222.17</td> </tr> <tr> <td>2024</td> <td>96.46</td> </tr> <tr> <td>2025</td> <td>0</td> </tr> <tr> <td>2026</td> <td>41.36</td> </tr> <tr> <td>2027</td> <td>122.32</td> </tr> </tbody> </table>	Year	Area (Ha)	2021	83.02	2022	0	2023	222.17	2024	96.46	2025	0	2026	41.36	2027	122.32	Complied
Year	Area (Ha)																		
2021	83.02																		
2022	0																		
2023	222.17																		
2024	96.46																		
2025	0																		
2026	41.36																		
2027	122.32																		
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>According to the Management Review Procedure rev 2 dated 23/07/2019, management review is conducted annually. The agenda, includes:</p> <ol style="list-style-type: none"> 1. Status of outstanding issues from previous meetings 2. Changes, improvement or modification of the Sustainability management system 	Complied																

		<ol style="list-style-type: none"> 3. Internal and external audit findings on sustainability management system 4. Complaints and grievances 5. Stakeholder meetings minutes 6. GHG 7. Continual improvement status & recommendation 8. Review sustainability related training 9. Review sustainability related policies 10. Review effectiveness in achieving quality, environmental, social, safety and health objectives. 11. Compliance to legal requirements 12. Supply chain and traceability. <p>The last management review was conducted on 09/07/2020.</p>	
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -</p>	<p>Among the continuous improvement plan verified against budget at GBSE certification unit are:</p> <ul style="list-style-type: none"> • Minimise use of certain pesticides such as paraquat or metamidophos – paraquat was last used in April 2019 • Waste reduction by recycling activity • Improving the machinery efficiency therefore fossil fuel usage is optimised • To improve the understanding of complaint procedure amongst stakeholders through stakeholders meeting • Maximising yield of crop 	Complied

3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>RSPO PalmGHG Calculator is used by the certification unit as a reporting method of its continuous improvement progress. Latest record was available under ACOP 2019 report.</p>	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>On the estates front three sets of manual had been developed and used daily in their operations, namely:</p> <ul style="list-style-type: none"> - Sustainability Management Procedure Manual enumerating 32 topics, latest update on 11/02/2019. - OSH Manual covers accident notification, PPE, health and safety programme, Emergency Response Plan, safety signage, OSH committee, HIRARC, and - Oil Palm Manual consisting of SOP describing activities at estate, example: <p>OPM 1: Land clearing, preparation, planting and legume covers establishment</p> <p>OPM 2: Oil palm nursery practices</p> <p>OPM 3: Planting density and planting technique</p> <p>OPM 4: Soil conservation and terracing</p> <p>OPM 5: Pest and disease</p>	Complied

		OPM 6: Weeding-weed management OPM 7: Manuring of oil palm OPM11: Harvesting OPM 13: Managing difficult soils	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	The mechanism to check consistent implementation for all activities carried out in the estate was through internal audit. Verified the internal audit report at GBSE.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	All records related to Internal Audit and Estate Inspector visit was maintained and available at mill and estate offices.	Complied
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	No new planting in Genting Bukit Sembilan Estate, however in aspect impact of environmental already include stakeholder on EFB implementation. The baseline SIA was conducted from 11/05/2009 – 11/06/2009 by University Kebangsaan Malaysia’s student engaged by Genting Plantations. Subsequent to the SIA, since 2017, the assessment is updated once every 2 years. The last assessment was updated in 2019 and the assessment was conducted between 02-05/07/2020. The update assessments are conducted internally by Genting Plantations Group Sustainability team and to assess the current impact to the surrounding communities. A list of interviewed parties is provided in the report.	Complied
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	Environmental aspect and impact was available dated 16/3/2020. The management establish the plan to ensure the application of	Complied

	<p>- Minor Compliance -</p>	<p>EFB must be 20m buffer from residential area. Record of training for contractor was on 22 April 2020.</p> <p>From the updated Social impact assessment, management plan is developed following the recommendation. The management plan is reviewed annually by the estate.</p> <p>The review of the management plan on 27/04/2020 has not included other concerns/impact from the recent Paya Kamunting division external stakeholder consultation conducted on 11/03/2020. Due to the recent Covid-19, stakeholder consultations has not been fully completed. Since the Malaysia government has allowed the business to resume, the stakeholder consultations have to be completed as soon as possible and include all the impacts raised into the management plan. A review of the management plan is required.</p> <p>During interview with local communities, it was found that they could have some problem regarding theft by the workers. This was not captured during the stakeholder consultation. The technique of consultation could be further improve to ensure all impacts are covered.</p> <p>Hence, an OFI was raised.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The review of the management plan on 27/04/2020 has not included other concerns/impact from the recent Paya Kamunting division external stakeholder consultation conducted on 11/03/2020. Please refer to 3.4.4 on opportunity for improved raised.</p>	Complied
<p>Criterion 3.5: A system for managing human resources is in place.</p>			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p>	<p>For local workers employment, the hiring procedure is as per the Procedure for Social Management rev 0 dated 18/01/2018. The procedure has highlighted that workers shall receive an</p>	Non-compliance

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

	- Minor Compliance -	employment contract; recruitment and promotion shall be based on merit and skills; and no discrimination using medical/pregnancy test results. Worker sample enrolled on 27/02/2020 was reviewed to verify that no discrimination in employment. However, the procedure for Foreign labour is not yet finalized and available.	
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Local employments' contract have been reviewed. Employment contract are retained. During the field assessment, it was observed that workers with hearing-impaired were hired. Please refer to 3.5.1 above on Foreign labour hiring procedure.	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	Genting Bukit Sembilan Estate had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. At the estate, among the HIRARC carried out covered activities like chemical mixing and spraying, manuring, chemical storage, harvesting, landfill and FFB collection and vehicle maintenance. Latest HIRARC was reviewed on 27/6/2020 Revision was done for harvesting activity after incident (snake bite).	Complied
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -	Genting Bukit Sembilan Estate has maintained an approved Health and Safety Policy dated 1/07/2018 that is displayed prominently on notice boards in English/Bahasa Malaysia. CHRA was conducted on 15/03/2017-30/04/2017 by registered assessor Reg. No. JKPP HIE 127/171-2 (154). This followed with Supplementary CHRA Report No. JKPP HQ/03/ASS/00/154-	Complied

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

		<p>2020/011 for the assessment for intended introduce use of G-Met pesticide by G-Planter Sdn Bhd.</p> <p>Health Surveillance Program:</p> <p>Annual Medical Surveillance has been conducted accordingly for all workers exposed to pesticide which includes woman and man. No pregnant/nursing workers were involved in pesticide handling works. Seen the Medical Surveillance Report dated 12/10/19 conducted for 14 workers by DOSH Reg. OHD No. HQ/12/DOC/00/262. Results indicates all 14 workers were fit to work.</p>	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Bukit Sembilan Estate has established an annual training program with latest training program for year 2020 that covers all aspects of the RSPO Principles and Criteria. The training need and program was made available for verification at all visited sites. Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE.</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Training records for employees available and maintained at the office. Records are verified on a sampling basis which covers all aspect of training and RSPO P&C requirement as follows:</p> <ul style="list-style-type: none"> a) First Aid Training dated 29/06/20 b) Harvesting Training dated 13/1/20 c) Loose fruit collection dated 8/04/20 d) SOP Training for Pre Mix of Chemical dated 11/03/20 	Complied

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

		<p>e) SOP Training for Spraying – Manual & Mechanized dated 11/03/20</p> <p>f) SOP COVID-19 Training dated 7/07/20</p> <p>g) Fire Fighting Training dated 6/07/20</p> <p>h) RSPO/MSPO Awareness dated 27/06/20</p> <p>i) SOP Training for EFB Application dated 22/04/20</p> <p>j) SOP Training for Palm Poisoning dated 15/04/20</p> <p>k) Training on construction wastes, paint containers, dust noise to contractors dated 19/07/20</p> <p>l) Environmental Responsibility & Biodiversity, HCV Area Management, Wildlife protection (No hunting etc) dated 08/01/20</p> <p>m) Manuring Training dated 10/03/20</p>	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	Not applicable	Not Applicable
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB</p>	Not applicable	Not Applicable

	without physically separating them, then only Mass Balance Module is applicable.		
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	Not applicable because single estate	Not Applicable
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	Not applicable	Not Applicable
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	Not applicable	Not Applicable
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	Not applicable	Not Applicable

	<ul style="list-style-type: none"> c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill. 		
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports. 	Not applicable	Not Applicable
3.8.7	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	Not applicable	Not Applicable

<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>Not applicable</p>	<p>Not Applicable</p>
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: 	<p>Not applicable</p>	<p>Not Applicable</p>

	<ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. 		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Not applicable	Not Applicable
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Not applicable	Not Applicable
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. 	Not applicable	Not Applicable

	<p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>		
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	Not applicable	Not Applicable
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	Not applicable	Not Applicable
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	Not applicable	Not Applicable
3.8.16	<p>Registration of Transactions</p>	Not applicable	Not Applicable

	<p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>		
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	Not applicable	Not Applicable
General corporate communications			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	Not applicable	Not Applicable
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	Not applicable	Not Applicable

4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable	Not Applicable
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	Not applicable	Not Applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Not applicable	Not Applicable
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Not applicable	Not Applicable
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Not applicable	Not Applicable
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.	Not applicable	Not Applicable

	b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	Not applicable	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Not applicable	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Not applicable	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not applicable	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Not applicable	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Not applicable	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Not applicable	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be	Not applicable	Not Applicable

	<p>undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
<p>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces. - Critical (Major) compliance -</p>	<p>The policy on prohibiting retaliation against Human Rights Defenders (HRD) is not yet established and implemented.</p>	<p>Non-compliance</p>
<p>4.1.2</p>	<p>The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -</p>	<p>Interview with workers confirms that there were no violence and harassment against them.</p>	<p>Complied</p>
<p>Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
<p>4.2.1</p>	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-</p>	<p>The Whistle-Blower policy dated 01/06/2020 provides a system for anonymity grievance.</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

	blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Other than the policy, the Complaints and Grievance Procedure rev 4 dated March 2020 documented the procedure to handle complaints and grievance related to estate/mill workers, external stakeholders and native customary rights. Document review and interview with workers and relevant stakeholders did not identify any grievances other than those request for house fixing. However please refer to 4.1.1 regarding HRD policy.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	The Complaints and Grievance Procedure rev 4 dated March 2020 documented the procedure to handle complaints and grievance related to estate/mill workers, external stakeholders and native customary rights. The procedure is available in both English and Bahasa Malaysia.	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	The grievance book was reviewed and mainly complaints are regarding house fixing. Dates of complaint and date of completing the fixing has been documented.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	The Complaints and Grievance Procedure rev 4 dated March 2020 documented the complainant shall be given the option of access to independent legal and technical advice, to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator in clause 2.1.10.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	There were no community development identified. However constantly there are request from the community for assistance such as grass cutting and donation for festive. The certification unit has documented the request and provide where it was appropriate.	Complied

Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The land for carrying out oil palm plantation activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities that there is no evidence of any legal, customary or user rights of other users on any of the GBSE.</p> <p>GBSE divided into 2 divisions with a total of 10 land titles/user rights as per sighted samples as following:</p> <ul style="list-style-type: none"> • Main Div.: <ul style="list-style-type: none"> i) Title # 36096; Lot # 52; Area: 564.9902 ha ii) Title # 36097; Lot # 53; Area: 21.0368 ha • Paya Kamuniting Div.: <ul style="list-style-type: none"> i) Title # GRN 197658; Lot # 3221; Area: 15.34 ha ii) Title # GRN 197658; Lot # 3199; Area: 3.818 ha <p>Area Statement as per Monthly Progress Report. The grants are attached with proper demarcated maps issued by the state authorities.</p>	Complied
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>The land for carrying out oil palm plantation activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities that there is no evidence of any legal, customary or user rights of other users on any of the GBSE.</p>	Complied
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p>	<p>The land for carrying out oil palm plantation activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities that there is no evidence of any legal, customary or user rights of other users on any of the GBSE.</p>	Complied

	- Minor compliance -		
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	The land for carrying out oil palm plantation activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities that there is no evidence of any legal, customary or user rights of other users on any of the GBSE. Therefore, no agreement-making process and negotiated agreements detailing FPIC process is necessary and available.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	The land for carrying out oil palm plantation activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities that there is no evidence of any legal, customary or user rights of other users on any of the GBSE. Therefore, no maps of an appropriate scale showing extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties is necessary and available.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	The land for carrying out oil palm plantation activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities that there is no evidence of any legal, customary or user rights of other users on any of the GBSE. Therefore, no evidence of implementation of agreements negotiated through FPIC has been annually reviewed in consultation with affected parties is necessary and available.	Complied

4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>The land for carrying out oil palm plantation activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities that there is no evidence of any legal, customary or user rights of other users on any of the GBSE.</p> <p>Therefore, no evidence of implementation of agreements negotiated through FPIC has been annually reviewed in consultation with affected parties is necessary and available.</p>	Complied
4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>The land for carrying out oil palm plantation activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities that there is no evidence of any legal, customary or user rights of other users on any of the GBSE.</p> <p>Therefore, no evidence of implementation of agreements negotiated through FPIC has been annually reviewed in consultation with affected parties is necessary and available.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>No customary land within estate of GBSE. Hence, this requirement is not applicable (N/A).</p>	Complied
<p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the SIA, there is no customary land present in this certification unit. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers.</p>	Complied

4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>The plantation was established since 1980s. Hence FPIC should not be applicable.</p> <p>Genting Plantations has also established the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>The plantation was established since 1980s. Hence FPIC should not be applicable.</p> <p>However, Genting Plantations has established the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>The plantation was established since 1980s. Hence FPIC should not be applicable.</p> <p>However, Genting Plantations has established the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is</p>	<p>The plantation was established since 1980s. Hence FPIC should not be applicable.</p>	Complied

	<p>independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>However, Genting Plantations has established the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.</p>	
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>The plantation was established since 1980s. Hence FPIC should not be applicable.</p> <p>However, Genting Plantations has established the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.5.7	<p>New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.</p> <p>- Minor compliance -</p>	<p>The plantation was established since 1980s and no new land development took place for this certification unit. Hence FPIC should not be applicable.</p> <p>However, Genting Plantations has established the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>The plantation was established since 1980s and no new land development took place for this certification unit.</p>	Complied

<p>Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -</p>	<p>Based on the SIA, there is no customary land present in this certification unit. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers. Through stakeholder interviews, there was no land dispute identified. However, if there is any land disputes, it will be managed following the Procedure on Conflict Resolution and Handling of Negotiations and Compensations within Genting Plantations Estates rev 3 dated 29/12/2017.</p>	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -</p>	<p>The Procedure on Conflict Resolution and Handling of Negotiations and Compensations within Genting Plantations Estates rev 3 dated 29/12/2017 is established to manage any compensation needed.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -</p>	<p>There is no scheme small holdings involved in this certification. Furthermore the estate has been established since 1980s and the surrounding land has been well established by villagers.</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -</p>	<p>The Procedure on Conflict Resolution and Handling of Negotiations and Compensations within Genting Plantations Estates rev 3 dated 29/12/2017 is established to manage any compensation needed. There was no land dispute recorded since last assessment.</p>	Complied
<p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -</p>	<p>Based on the SIA, there is no customary land present in this certification unit. The estate has been developed in the 1980s. Since</p>	Complied

		<p>then there were no new development. Hence the FPIC negotiation is not applicable.</p> <p>However, the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020 is in place. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.</p>	
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the SIA, there is no customary land present in this certification unit. The estate has been developed in the 1980s. Since then there were no new development. Hence the FPIC negotiation is not applicable.</p> <p>However, the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020 is in place. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>Although this certification does not involved in land acquisition that may FPIC and land use right access, however, Genting Plantation had maintained all existing user rights and it is confirmed during interview with stakeholders and villagers.</p>	Complied
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition</p>	<p>The estate has been developed in the 1980s and since then there were no new development. Although the this indicator may not be applicable to this certification unit, Genting Plantation has</p>	Complied

	<p>is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>maintained the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.</p> <p>Although this certification does not involved in land acquisition that may FPIC and land use right access, however, Genting Plantation had maintained all existing user rights and it is confirmed during interview with stakeholders and villagers.</p>	
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantation had maintained all existing user rights and it is confirmed during interview with stakeholders and villagers.</p>	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	<p>The estate has been developed in the 1980s and since then there were no new development.</p>	Complied
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	<p>The Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020 is in place. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.</p>	Complied

		There was no conflict or dispute recorded since last assessment.	
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Genting Bukit Sembilan estate was not accessible to FFB buying.	Not Applicable
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Genting Bukit Sembilan estate was not accessible to FFB buying.	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Genting Bukit Sembilan estate was not accessible to FFB buying.	Not Applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	Genting Bukit Sembilan estate was not accessible to FFB buying.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Genting Bukit Sembilan estate was not accessible to FFB buying.	Not Applicable
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Genting Bukit Sembilan estate was not accessible to FFB buying.	Not Applicable

5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	Genting Bukit Sembilan estate was not accessible to FFB buying.	Not Applicable
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	Genting Bukit Sembilan estate give training to smallholder/stakeholder , record showed on 11 March 2020. This training regarding best practice and MSPO and RSPO awareness.	Complied
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	The Complaint and Grievances procedure was available (SMP-GPB-19; Rev 04; Dated March 2020) this include grievance mechanism for smallholders and no record since 2017 of smallholder complaint.	Complied
<p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
5.2.1	<p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	The certification is a single estate certification. It does not involved purchasing of smallholders FFBs. Hence this requirement is not applicable.	Not Applicable
5.2.2	<p>The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p> <p>- Minor compliance -</p>	The certification is a single estate certification. It does not involved purchasing of smallholders FFBs. Hence this requirement is not applicable.	Not Applicable

5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	The certification is a single estate certification. It does not involved purchasing of smallholders FFBS. Hence this requirement is not applicable.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	The certification is a single estate certification. It does not involved purchasing of smallholders FFBS. Hence this requirement is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	The certification is a single estate certification. It does not involved purchasing of smallholders FFBS. Hence this requirement is not applicable.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	The People Policy dated 03/09/2009 documented Genting Plantation's commitment towards non-discrimination and equal opportunity. During workers' interview, it was found that Genting had hired workers with impairment and all religion are hired. There were no discrimination found.	Complied
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance -	Interview with foreign workers confirmed that Genting Plantations pay for fees including air tickets, levies and medical fees. There is not charge to the workers. Interview with female workers confirms that there were no discrimination against them. Equal opportunity and overtime has been offered to the workers.	Complied
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	The hiring of workers are based on fitness of the task. There are no discrimination recorded. The clerk hiring process was sampled and	Complied

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

	- Minor compliance -	the decision to hire was based on skills and qualifications. The medical fitness test was not the deciding factor of hiring.	
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	Pregnancy test is only conducted for females that are handling chemicals. Interview with the females workers found that work alternative is offered when they are pregnant and cannot handle chemicals. The offers includes for female workers are still breast feeding the new born.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	The special women committee has established. The Chairperson of the committee is the chief clerk. Selection of the chairperson is by voting and meeting held are documented. Training such as sexual harassment and protection of sexual harassment was conducted. However, further improvement can be made to identify the type of awareness program to improve women knowledge and opportunities. Hence, an OFI was raised.	OFI
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Pay slips of sampled female workers and foreigners verified that pays are equal for the same scope of work. Overtime offered to these groups of workers was not discriminated.	Complied
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	Samples of 15 workers from all operations type was reviewed. The work contract has referenced to the applicable Malaysian Law. Pay and conditions are stated in the contract and the MAPA/NUPW agreement was referenced. The contract are available in the language understood by the workers.	Complied
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal	The contracts reviewed have include terms such as termination of contract, renewal of contracts, work hours, overtime, leave, sick leave, maternity leave entitlement.	Complied

	<p>requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Interview with workers especially foreign workers confirmed that they have sign the work agreement at the home country prior departure to Malaysia.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Workers are issued with pay slips documenting the pay received and correspondence with the work hours or piece works. For any deduction on the salary has received the Department of Human Resource approval. Days of workers that did not attend work is recorded in the daily check-roll book.</p> <p>Minimum wage for worker a Grabber driver was not achieved during low crop months i.e. November 2019 and no top-up despite he has met his productivity. Furthermore, the worker was moved from harvesting operation to general work. However, the moving of the worker did not consider the Price Bonus for Field workers as he is considered as harvesting operation.</p>	Non-compliance
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Housing facilities provided by the CH is deemed sufficient. Cleanliness of the facilities are maintained.</p> <p>Each house are provided with electricity and clean water.</p> <p>Interview with workers confirms that each house are usually for 2-4 people and it is not over crowded.</p> <p>Housing inspections are conducted by periodically and any damages are requested through the grievance mechanism and attended by the CH.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>The CH has allocated land at the housing area for workers to do some vegetable farming. Additional to these, the estate is located at urban. Hence affordable food is easily accessible.</p>	Complied

<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p>	<p>The interim requirement to identify the in-kinds benefit has been conducted by Genting Plantation.</p>	<p>Complied</p>
--------------	---	---	-----------------

	<p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>All foreign workers are under the check-roll of Genting Plantations. No casual or temporary workers were hired for work such as harvesting, loose fruits collection, spraying, fertilizing and nursery activities.</p> <p>Local contract workers are employed by contractors for core work such as harvesting. Contract details of the workers were verified that they are fulltime workers of the contractor.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The People Policy dated 03/09/2009 stated that “no one shall be denied of their rights, freedom of association and equal opportunities”. The policy is available in both English and Bahasa Malaysia.</p> <p>The list of Trade Union workers was observed. There is 27 workers registered with NUPW.</p> <p>Interview with Kedah State NUPW Secretariat confirmed that there is no such restriction observed in Bukit Sembilan.</p>	Complied

6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request. - Minor compliance -	There is no meeting held with NUPW. However the workers' committee meetings are being held on quarterly. The last meeting was held on 31/01/2020. Due to the Covid-19 pandemic, subsequent meetings were delayed.	Complied
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	Workers representatives are elected by workers usually during morning muster. There is no management interference in this process.	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	The People Policy dated 03/08/2009 stated that Genting Plantations will not employ nor exploit under aged children to work in their operating unit. The terms of contract with contractors has stated similar that no under age children shall be employed by the contractors for any activities at the certification unit.	Complied
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -	The age screening mechanism has been built in to the Litramax system. The system does not allow to register any workers that is below 18 years old. The workers list was further verified to confirm there is not workers below the age of 18. This includes the contractor's worker for FFB transport and FFB harvest.	Complied
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	There is no young worker employed at Genting Bukit Sembilan Estate. Details of compliance been identified as per Sustainability Management Procedure Manual – Legal Requirement Register Part 3: Social, Doc. No. SMP-GPB-22 under part 11. Children and Young Persons (Employment) Act 1966, Children & Young Persons	Complied

		(Employment) (Amendment) 2018. Verified during the field visit, no young persons were employed.	
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	The People Policy dated 03/08/2009 stated that Genting Plantations will not employ nor exploit under aged children to work in their operating unit. The terms of contract with contractors has stated similar that no under age children shall be employed by the contractors for any activities at the certification unit. The policy is explained to the workers usually during the morning briefing. The policy is also published at locations such as housing area and master ground to make it easy for workers' access. Interview with contractors confirm they understood the no child labour policy implemented by Genting Plantations.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	The Sexual Harassment Policy dated 03/08/2009 is established. The policy is communicated through morning briefing and publicizing the policy on notice boards. Interviewed with workers confirms they are aware about no sexual harassment.	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	The Social Policy dated 22/06/2015 is established. The policy has been briefed to all the workers during induction training and morning briefing. Workers records shown that there are cases of pregnancy and workers still maintained their work but in a location that that is suitable.	Complied
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -	Consultation was conducted with a new mother during the gender committee meeting. The process of conducting the consultation can be further improved to ensure it is able to cover all new mothers in any period.	OFI

6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The Procedure on Prevention and Eradication of Sexual Harassment at the Workplace rev 2 dated 11/10/2013 was established to describe what is sexual harassment and how to launch a grievance/complaint if such event took place.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Contracts of 15 sampled foreign workers were reviewed. The contracts does not have any clauses that deemed to be promoting forced labour.</p> <p>Interview with workers confirmed that there were no debt bondages especially when they wanted to return home for holidays.</p> <p>Personnel identifications are either kept by workers or when required, will be kept at the office. The passport are hand over to the office voluntary.</p> <p>Interview with workers shows that overtime are voluntary and the CH ensure that the overtime are following the allowable overtime under the Employment Act.</p>	Complied
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations has developed Procedures for Social Management, Doc. No. SMP-GPB-32, Rev. 0, dated 18/01/2018. The procedure has outlined the practices of the company such as no contract of substitution for the foreign workers, provide reasonable and safe living condition to all the employees, post arrival orientation will be provided to brief on terms and conditions, safety & health, national and state laws and regulations and no discrimination to all the workers.</p>	Complied
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

<p>6.7.1</p>	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The OSH policy is well briefed to all workers. Interview with workers reveal that they understand the policy and the importance of safety at work at Genting Bukit Sembilan Estate.</p> <p>Genting Bukit Sembilan Estate:</p> <p>OSH meeting conducted on quarterly basis. For year 2020 the 1st OSH Meeting was conducted on 23/06/2020 combining the 1st quarter meeting scheduled on March 2020. This was done due to the COVID-19 Movement Control Order which rescheduled the meeting program. Seen the meeting minutes dated 23/6/20, 23/12/19, 23/09/19 & 28/06/19.</p> <p>Verified that for accidents occurred e.g. accident dated 25/06/20, a special emergency OSH Meeting was done on 26/06/20 to discuss on the investigation accordingly.</p> <p>Appointed letter for OSH Committee members available with latest issuance dated 30/05/2020 for Appointment of New Secretary. Verified also that appointment letters for Chairman, Employees Representative and Employer Representative has been issued accordingly with the respective roles & responsibilities clearly stated in the appointment letters.</p> <p>Training on OSH Committee members pertaining to the roles and responsibilities been conducted accordingly on 1/6/20.</p>	<p>Complied</p>
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>Accident and emergency procedures have been communicated to employees, contractors and visitors.</p> <p>Fire evacuation drill at Genting Bukit was conducted on 06/07/20 to test the state of readiness during emergency situation.</p> <p>Accident and emergency procedures are in English/Bahasa Malaysia and this is understood by the responsible workers, staff or</p>	<p>Complied</p>

	<p>- Minor compliance -</p>	<p>executives involved in the operation. Good understanding level observed among the workers.</p> <p>Training for First Aid is conducted on annual basis. Adequate first aiders trained available. Latest First Aid Training done dated 29/06/20</p> <p>First aid equipment is available at worksites. During the site visit there is evident that First Aid Box is available at the relevant area.</p> <p>Fire extinguisher (ABC Powder) assessed during the site observation are available and within the expiry date.</p> <p>Portable emergency eye wash & shower facility available at chemical store, workshop and mixing area</p> <p>Sampled case reported with JKPP 6 submission dated 26/06/20. Verified that the Incident Investigation Report been raised according including review of existing HIRARC accordingly dated 27/06/20 for Harvesting. DOSH visit been recorded in the DOSH log book. Seen the latest DOSH visit recorded dated 17/03/2020 and comments highlighted by DOSH was noted and rectification process was in progress related to the DOSH improvement notice S/N: 133432.</p>	
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>1) PPE issuance record sampled for sprayers: -</p> <ul style="list-style-type: none"> a) Apron dated 2/5/20 b) Nitrile Glove dated 3/7/20 c) N95 mask dated 3/7/20 d) Goggle dated 3/7/20 <p>2) PPE issuance record sampled for harvesters: -</p> <ul style="list-style-type: none"> a) Rubber Boot dated 15/2/20 b) Pole dated 20/4/20 	<p>Non-compliance</p>

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

		<p>c) Sickle dated 20/5/20 d) Safety Helmet dated 17/5/19</p> <p>A nonconformance was raised on below matters: PPE compliance was not fully adequate. A harvesting worker was found wearing short pants during at work. This was not as per to the Clause 2.1 PPE compliance requirement of wearing thick and long – jeans/khakis as stated in Harvesting Procedure, Doc. No. SOP-GBSE-11, Latest Update: 27/06/2020</p>	
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care and accident insurance is provided to all the employees. Workers are covered under SOCSO scheme. Seen the SOCSO scheme payment schedule at Genting Bukit Sembilan Estate for April 2020, May 2020 & June 2020.</p> <p>Above Sosco submission were done using the Borang 8A. Details of the Employer and worker’s details been available accordingly.</p>	Complied
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records on Lost Time Accident (LTA) metrics at Genting Bukit Estate had been verified. JKPP 8 been submitted to DOSH annually with latest done Ref No. JKPP 8/56587/2019 submitted for year ending 2019 to DOSH on 29/1/2020.</p>	Complied
<p>Principle 7: Protect, conserve and enhance ecosystems and the environment</p>			
<p>Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>IPM Plan available for reviewed dated 10 July 2020. This include identification on potential pest in estate and action to be taken. Sample on implementation of Barn Owl Box (BOB) to increase ration from 1:25 into 1:23. From the monitoring of occupancy of BOB dated 20/2/2020 was 76%.</p>	Complied

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	No record of species of Global invasive database ad CABI.Org in Genting Ayer Item and Supply base	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	Genting not use fire as pest control in estate, this stated under Zero Burning Policy; Rev 01; 10 August 2011. There shall be no open burning of any kind at operating units, except where deemed necessary with the prior approval of the relevant authorities.	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	Justification of pesticides applied is available in the Sustainability Management Procedure, SMP-GPB-28 dated 21/07/2015. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non- target species.	Complied
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - Critical (Major) compliance -	The records of pesticide use was available in pesticide and chemical usage record as per todate the record was 0.524 lower than previous year 1.752.	Complied
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in GENP Sustainability Management Procedure Manual, SMP-GPB-28 Rev04, dated 3 July 2018. The implementation in the field is consistent with the manual.	Complied
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in GENP Sustainability Management Procedure Manual, SMP-GPB-28 Rev04, dated 3 July 2018. The implementation in the field is consistent with the manual. Genting	Complied

		Management views the use of agrochemicals in its daily operation as essential but not at the expense of its existing IPM programme. All pesticides application is carried out as per the Oil Palm Manual and SOP. There is no prophylactic use of pesticides.	
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	Sighting of the Chemical Register showed that only class III & IV chemicals were used at the estates visited. During the site visit to the chemical store it was justified that there were only class III and IV chemicals being used. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead.	Complied
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides operators have been given training on the safety handling and application of pesticides. The training have been provided by Asst. Manager, Medical Assistant and suppliers of Spraying Equipment/ Pesticides who are knowledgeable on pesticides handling and application. Sighted the training records as follows:</p> <ul style="list-style-type: none"> a) SOP Training for Pre Mix of Chemical dated 11/03/20 b) SOP Training for Spraying – Manual & Mechanized dated 11/03/20 c) SOP COVID-19 Training dated 7/07/20 	Complied

7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices. - Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazad Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -</p>	<p>Sighted the unused empty chemical containers that were triple rinsed, pierced 3 holes at the bottom and kept at Scheduled Waste Store. They are disposed via G-Planter Sdn Bhd. as non-scheduled waste. The approval of G-Planter to collect the containers was verified and found in order. Last disposal of empty container at G-Planter on 10/7/2019 with total 247 container.</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -</p>	<p>There was no aerial spraying observed at Genting Bukit Sembilan estate</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -</p>	<p>Annual Medical Surveillance has been conducted accordingly for all workers exposed to pesticide which includes woman and man. No pregnant/nursing workers were involved in pesticide handling works. Seen the Medical Surveillance Report dated 12/10/19 conducted for 14 workers by DOSH Reg. OHD No.</p>	Complied

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

		HQ/12/DOC/00/262. Results indicates all 14 workers were fit to work.	
7.2.11	(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance -	No person under the age of 18, pregnant/nursing workers were involved in pesticide handling works. This was verified during the field visit.	Complied
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance -	Waste management plan establish dated 27 April 2020, This waste management includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics. The Implementation was available as per indicator 7.3.2	Complied
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	Empty chemical containers are reused for premix containers for spraying activities. For those containers that are can't reused anymore, it will be disposed through scheduled waste or collected by G-Planters. Sampling on SW disposal as per below:- Consignment note (20190715161FNPZD) dated 15/7/2020 for SW 305 Consignment note 2019071516XC58KG dated 15/07/219 for SW 409 Last disposal of empty container at G-Planter on 10/7/2019 with total 247 container. Ref.: Sustainability Management Procedure Manual, SMP-GPB-12, rev. 1, dated 1/12/2014. Based on interview and site verification, it was noted that the proper disposal of wastes was understood by the workers and management.	Complied
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	Based on site verification and interview with employees at all the sampled operating units, there was no use of fire in wastes disposal observed. No Sighted of unit using fire as waste disposal.	Complied

Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.										
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	GBSE continuously implement practices good agricultural practices as guided in their SOPs (Oil Palm Manual, dated 30/8/2013). They are followed to manage the soil fertility to levels ensuring optimal and sustainable yields.	Complied							
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	The Soil Sampling conducted on 1/4/2016 by Genting Plantations Research Berhad (SR08/2016). Agronomist visit conducted on April 2019. This monitoring was done yearly bases. August 2020 will be another visit.	Complied							
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	Based on SOP Manual, OPM 7: Manuring of Oil Palm, the nutrient strategy includes the use of Empty Fruit Bunches (EFB) distributed in the field to improve the soil structure as well as to improve the organic matter. Recommendation per round is 25 MT (main division) and PKD is 40 mt per round. EFB application recorded:-	Complied							
		<table border="1"> <thead> <tr> <th>Year</th> <th>EFB record/ Target</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>11290.53 mt</td> </tr> <tr> <td>2020</td> <td>13236.50 mt</td> </tr> </tbody> </table>	Year	EFB record/ Target	2019	11290.53 mt	2020	13236.50 mt		
Year	EFB record/ Target									
2019	11290.53 mt									
2020	13236.50 mt									
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Fertilizers are applied as per agronomist recommendation. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators.	Complied							

		The application record was maintained accordingly. Sampling on application on NKB was on 15 May 2020	
Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	Map available prepared by Genting Research Centre dated 26 August 2013. Based on the soil map, there is no other fragile and problem soils found in GBSE and its divisions. Landscapes of GBSE are mostly undulating, flat, rolling and hilly. No planting within areas more than 25 degrees in GBSE.	Complied
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	Landscapes of GBSE are mostly undulating, flat, rolling and hilly. No planting within areas more than 25 degrees in GBSE. Management also have establish procedures for guidance OPM 4 : Soil conservation and terracing (rev 2013) and also the Steep land Management SMP –GPB-10.	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting in GBSE.	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	GBSE continuously implement practices good agricultural practices as guided in their SOPs (Oil Palm Manual, dated 30/8/2013). They are followed to manage the soil fertility to levels ensuring optimal and sustainable yields.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	The last soil sampling was carried out on March 2016, refer to report SR08/2016 dated 7 March 2016. No fragile soil in GBSE.	Complied

7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	The agronomist from GPRC will visit the estate and conduct the sampling on annual basis. Based on Soil Sampling Procedure dated 1/12/17, the frequency of analysis is every 5 years. The last soil sampling was carried out on March 2016, refer to report SR08/2016 dated 7 March 2016.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	The agronomist from GPRC will visit the estate and conduct the sampling on annual basis. Based on Soil Sampling Procedure dated 1/12/17, the frequency of analysis is every 5 years. The last soil sampling was carried out on March 2016, refer to report SR08/2016 dated 7 March 2016. No peat soil reported in GBSE.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	No peat soil in all estate. Not applicable	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	No peat soil in all estate. Not applicable	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	No peat soil in all estate. Not applicable	Not Applicable
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two	No peat soil in all estate. Not applicable	Not Applicable

	<p>cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>		
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	No peat soil in all estate. Not applicable	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	No peat soil in all estate. Not applicable	Complied
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p>	<p>The water management plan available for reviewed dated 8/7/2020 to maintain the quality and availability of natural water resources (surface and ground water). The water management plan include;-</p> <p>i. Two water source been declared from water government (SADA) and water from collection pond.</p>	Complied

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

	<p>b) Workers have adequate access to clean water. - Minor compliance -</p>	<p>ii. The monitoring of outgoing water been twice a year, latest record was on June 2020. From the monitoring Bkt Sembilan estate have 2 inlet and one outlet. The result showed inclined with INWQS(National Water Quality Standards. Previous record was on Sept 2019.</p> <p>iii. To optimize the water and nutrient usage to reduce wastage, management to monitoring the pipe leakage in residential area, ensure no leakage of spraying pumps and educate the workers regarding to promotes water conservation. Sample implementation of water leakage as per linesite inspection (latest record 10/6/2020) done by weekly.</p> <p>iv. For protection of water courses, site visit at area P05 sighted no chemical activity trace in bufferzone area.</p> <p>v. No trace of natural vegetation in riparian areas has been removed. All in good condition.</p> <p>vi. No bore well is being use for water supply, GBSE using SADA (Syarikat Air Darul Aman) as water supply.</p>	
<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle. - Critical (Major) compliance -</p>	<p>Management of riparian zone is guided by the GPB's Riparian Buffer Zone Management, doc. No. SMP-GPB-14, rev. 1, dated 14/8/2014. The width of riparian zone has been defined in the procedure. The allocated zones shall be demarcated and left to the nature. Application of agrochemicals such as fertilisers and herbicides is prohibited.</p>	<p>Complied</p>
<p>7.8.3</p>	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -</p>	<p>This was a single estate. Not applicable</p>	<p>Complied</p>

7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	This was a single estate. Not applicable	Not Applicable
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	The estates consistently monitored their fossil fuel consumption and kept records in order to get the information about efficient consumption. Among the management plans to improve efficiency generally were: - To carry out preventive maintenance of machinery in order to prevent high breakdown hours and making the machines more efficient - continuous education to operators who handle the machinery so that the unnecessary running hours can be minimised	Complied
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	The GHG emission are identified and assess for the Genting Bukit Sembilan. The data was accurate as per verification on diesel data and fertiliser used in GBSE.	Complied
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	Not applicable since no new development by the certification unit.	Not applicable
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	Other significant pollutant identified is the smoke emission from boiler operation. The mill currently is using multi-stage dust cyclone to minimise the pollutant. Monitoring of quality is done through	Complied

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

	- Critical (Major) compliance -	regular stack sampling. Verification of the stack sampling reports shows that the mill complied with the regulated limit.	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	As per Zero Burning Policy dated 10 August 2011, there shall be no open burning of any kind at operating unit except where deemed necessary with prior approval of the relevant parties or authorities.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	The management already establish regarding to fire prevention standard operating procedure and control the measure such as warning signs at land clearing area and scheduled for patrolling of replanting area, estate boundary area during prolong dry season and also install stop off to retain water at 50 cm to 60 cm in the field for keep the soil moisture and prevent fire outbreak occurred.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Due to fire prevention and control measure, during stakeholder meeting management inform the stakeholder regarding to zero burning policy. This meeting involve the interested parties such as smallholder, authorities, contractor, and others.	Complied
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	Not applicable since there is no land clearing after November 2005	Complied
7.12.2	(C) HCVs, HCS forests and other conservation areas are identified as follows:	The GBSE had re-assessed to collate information relating to HCV. The assessment contained information of both planted area and	Complied

	<p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -</p>	<p>relevant wider landscape-level, and result of HCV was obtained. The Inventory of HCV Sites within Genting Plantations Berhad Group of Estates (Northern Region) has been conducted on 27/3/2010 by Dr Yap Son Kheong. Identification of HCV in Bukit Sembilan estate have 2 HCV;- HCV 4.2(Steep area sites and rocky area at OP 93A and HCV 6 (Temple and Cemetery area) with total 2.15 Ha however the detail of hectare area was not available</p>	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -</p>	<p>The Inventory of HCV Sites within Genting Plantations Berhad Group of Estates (Northern Region) has been conducted on 27/3/2010 by Dr Yap Son Kheong.</p> <ul style="list-style-type: none"> • Identification of HCV in Bukit Sembilan estate have 2 HCV;- HCV 4.2(Steep area sites and rocky area at OP 93A and HCV 6 (Temple and Cemetery area) with total 2.15 Ha however the detail of hectare area was not available. <p>The Identification of RTE species was available under HCV report (Table 2: List of Fauna). However not included Malayan Pit Viper.</p>	Complied
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated</p>	<p>Not applicable since there is no land clearing after November 2005.</p>	Complied

	<p>agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>		
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The assessment contained information of both planted area and relevant wider landscape-level, and result of HCV was obtained. The report of assessment contained all rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment HCV. The Biodiversity training conducted on 12/1/2020</p>	Complied
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The latest monitoring was done on 10/4/2020 and RTE species monitoring dated 6/12/2018, monitoring was done 4 month once. This management plan will be reviewed annually by management latest reviewed was on Jan 2020. The training on Buffer Zone on 15/1/2020</p> <p>The Identification of RTE species was available under HCV report (12.6 Appendix VI Inventory of Flora and Fauna at Genting Bukit Sembilan estate; Table 2: List of Fauna). However not included Malayan Pit Viper.</p>	Non-compliance
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>Not applicable since there is no land clearing after November 2005.</p>	Complied

Appendix B: Approved Time Bound Plan

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	Status as of January 2020	Any unresolved non-compliances	
1	Genting Plantations (WM) Sdn Bhd & Setiamas Sdn Bhd(100%)for estates Genting Oil Mill Sdn Bhd (100%) for mill	Genting Sri Gading Estate,	Supply base for Genting Ayer Item Oil Mill, Johor, Malaysia	Dec,2014	Certified	None
2		Genting Sungei Rayat Estate,				
3		Genting Kulai Besar Estate,				
4		Genting Tanah Merah Estate,		Dec,2015		
5		Genting Tebong Estate,		July, 2015		
		Genting Sepang Estate		Feb, 2020		
	Genting Cheng Estate		"Extension of Scope" audit due to merger with Genting Tebong Estate			
6	Genting Plantations (WM) Sdn Bhd (100%)for estates	Genting Selama Estate, Kedah, Malaysia		July 2019	Certified	None

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of January 2020	Any unresolved non-compliances
7	Genting SDC Sdn Bhd (100%)	Genting Sabapalm Estate, Sabah, Malaysia	Supply base for Genting Sabapalm Oil Mill, Sabah, Malaysia	Aug,2015	Certified	None
8	Genting Tanjung Bahagia Sdn Bhd (100%) for estates	Genting Tanjung Estate, Sabah, Malaysia	Supply base for Genting Tanjung Oil Mill, Sabah, Malaysia	Aug,2016	Certified	None
9		Genting Tenegang Estate, Sabah, Malaysia				
10		Genting Layang Estate, Sabah, Malaysia				
11		Genting Bahagia Estate,				
12	Landworthy Sdn Bhd (84%)	Genting Landworthy Estate, Sabah, Malaysia				
13	Genting Tanjung Bahagia Sdn Bhd (100%) for estates	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah Oil Mill, Sabah, Malaysia	2020		Concept Note for RACP to be re-submitted to RSPO.
14		Genting Permai Estate, Sabah, Malaysia				
15		Genting Kencana Estate, Sabah, Malaysia				

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	Status as of January 2020	Any unresolved non-compliances	
16	Genting SDC Sdn Bhd (100%) for estate and mill	Genting Jambongan Estate, Sabah, Malaysia Supply base for Genting Jambongan Oil Mill, Sabah, Malaysia	Sept 2019	Certified	None	
17	Genting Plantations Bhd Wawasan Land Progress Sdn Bhd (100%)	Genting Sekong Estate, Sabah, Malaysia Supply base for Genting Trushidup Oil Mill, Sabah, Malaysia	Sept, 2017	Certified	None	
18	Asiaticom Sdn Bhd (100%) Sawit Sukau Usahasama Sdn Bhd(56%)	Genting Suan Lamba Estate, Sabah, Malaysia				
19	PT Sepanjang Intisurya Mulia (70%)	Mulia 1 & 2 Mulia 3 & 4 Mulia 5 & 6 SISM Plasma	Supply base for Mulia Oil Mill, Kalimantan, Indonesia	Oct, 2017	Certified	None PT SMA (1k) – NPP submitted for 30 days public notification (30 April 2020)
20	PT Sawit Mitra Abadi (70%)	Abadi 1 & 2 Abadi 3 & 4 SMA Plasma				

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	Status as of January 2020	Any unresolved non-compliances	
21	Genting Plantations Berhad (100%)	Genting Mewah Estate, Sabah, Malaysia	Supply base for Genting Mewah Oil Mill, Sabah, Malaysia	Mar, 2017	Certified	None
22	Genting Plantations (WM) Sdn Bhd (100%)	Genting Bukit Sembilan Estate, Kedah, Malaysia		July, 2017	Certified	None
23	Knowledge One Investment Pte Ltd (85%)-PT Kharisma Inti Usaha (KIU)	KIU 1 KIU 2 KIU 3 KIU 4	Supply base for KIU Oil Mill	Dec, 2021		NPP in progress. HCV report being reviewed by HCVRN. HCSA report to be reviewed by HCSA
		KIU Plasma				
24	PT Agro Abadi Cemerlang (70%)	AAC 1 & 2 AAC 3 & 4	Supply base for AAC Oil Mill*	Oct, 2021		HCSA report under review by HCSA. NPP completed
		AAC Plasma				
25	PT Surya Agro Palma (70%)	SAP Estate 1 SAP Estate 2, 3 & 4 SAP Estate 5 & 6				In process of obtaining HGU. HCSA report in progress.
		SAP Plasma				

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	Status as of January 2020	Any unresolved non-compliances	
26	PT Globalindo Agung Lestari (60%)	Lamunti Barat Estate Lamunti Timur Estate I & II Mengkatip Estate I & II Bakuta Estate Plasma Timur & Barat	Supply base for Globalindo Oil Mill, Kalimantan, Indonesia	Nov, 2021		In process of obtaining HGU HCSA report in progress.
27	PT United Agro Indonesia (60%)	PT UAI 1 & 2	Supply base for UAI Oil Mill, Kalimantan, Indonesia	Oct, 2022	In process of obtaining HGU NPP for PT UAI in progress. HCSA report in progress.	
		UAI Plasma				
28	PT Susantri Permai (95%)	Puroh Estate Masaha Estate Zircon Hill Estate	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia	Oct, 2023	In the process of obtaining Forest Release and Forest Exchange prior to HGU application.	
		SP Plasma		Oct, 2023		
29	PT Dwie Warna Karya (95%)	Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate	Supply bases for Golden Hill Oil Mill, Kalimantan Indonesia	Oct , 2023	In the process of obtaining Forest Release and Forest Exchange prior to HGU application.	
		DWK Plasma				
30	PT Kapuas Maju Jaya (95%)	Waterfall Estate I & II Muhun Estate I & II Talawang Estate I & II	Supply bases for KMJ Oil Mill,	Oct,2023		In the process of obtaining Forest Release and Forest

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of January 2020	Any unresolved non-compliances
		KMJ Plasma	Kalimantan Indonesia			Exchange prior to HGU application.
31	PT Citra Sawit Cemerlang (70%)	Cemerlang Estates	Supply base for CSC Oil Mill*	Oct,2023		In process of obtaining HGU. HCSA report under review by HCSA.
		CSC Plasma				
32	PT Palma Agro Lestari Jaya (70%)	PALJ Estates	Supply base for PALJ Oil Mill*	Aug,2023		In process of obtaining HGU. HCSA report under review by HCSA. NPP completed.
		PALJ Plasma				

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2019** for **Bukit Sembilan estate** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2019** for **Bukit Sembilan estate** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0
PKO	0

Extraction	%
OER	0
KER	0

Production	t/yr
FFB Process	0
CPO Produced	0
PKO Produced	0

Land Use	Ha
OP Planted Area	1180.06
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	2.15
Total	1182.21

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	0	0	0	0	0	0	0	0
CO ₂ Emission from fertilizer	0	0	0	0	0	0	0	0
NO ₂ Emission	0	0	0	0	0	0	0	0
Fuel Consumption	0	0	0	0	0	0	0	0
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	0	0	0	0	0	0	0	0
Conservation Sequestration	0	0	0	0	0	0	0	0

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

Total	0	0	0	0	0	0	0	0
--------------	---	---	---	---	---	---	---	---

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0	0
Fuel Consumption	0	0
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	0	0

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

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

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

Appendix D: Supply Chain Declaration (Not Applicable)

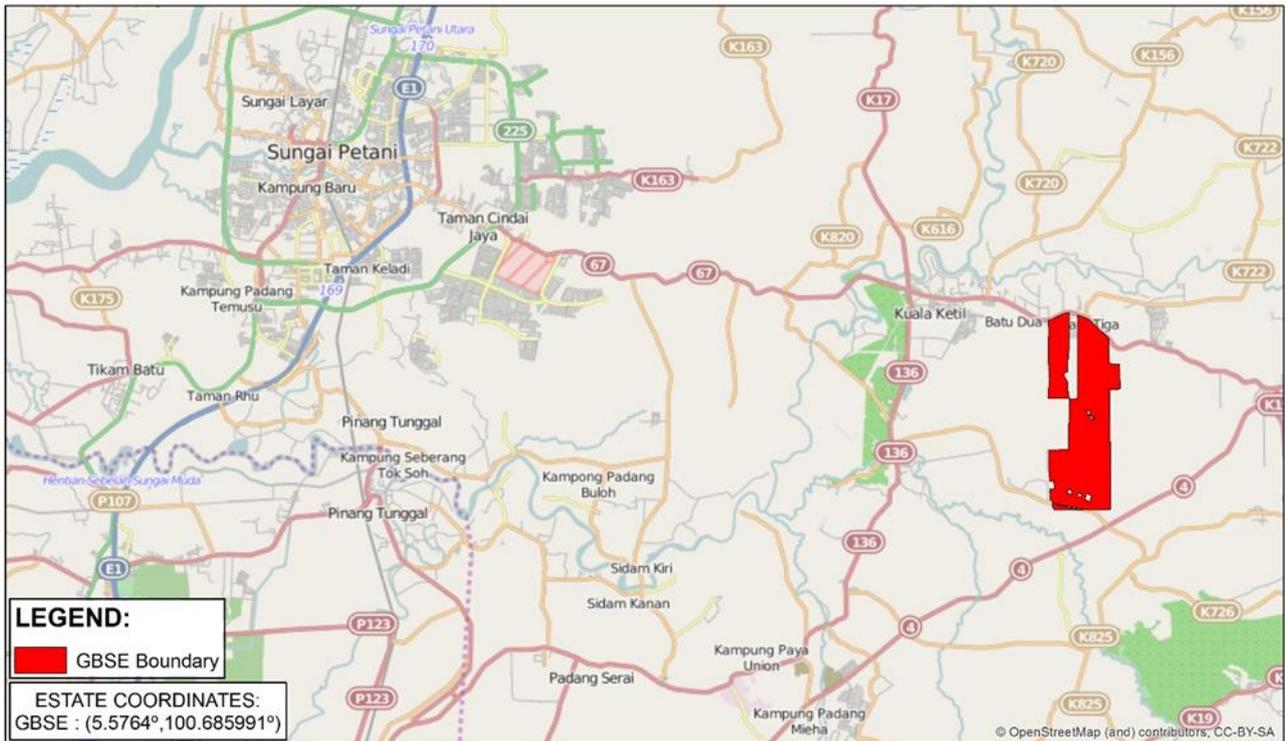
Appendix E: Location Map of Certification Unit and Supply bases



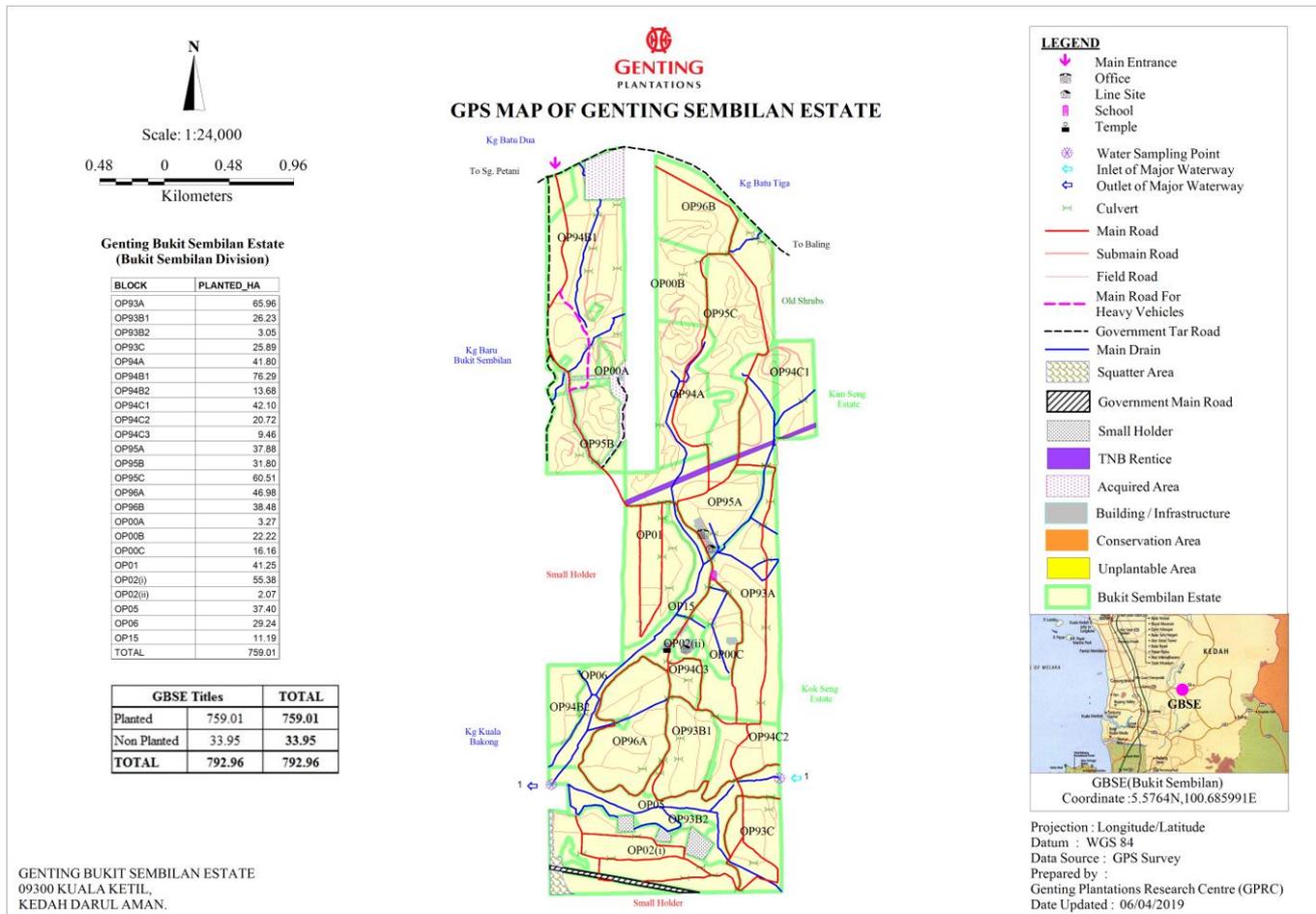
LOCATION MAP
GENTING BUKIT SEMBILAN ESTATE



Scale 1:131,700



Appendix F: Estate Field Map



Appendix G: List of Smallholder Sampled *(N/A)*

Appendix H: List of Abbreviations

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