

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

Client Company name (Parent Company): Genting Plantations Berhad
Client company Address: 10th Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
Certification Unit: Genting Oil Mills (Sabah) Sdn Bhd - Genting Tanjung Oil Mill
Location of Certification Unit: Mile 97, Sandakan-Lahad Datu Road, Tenegang, Jalan Jeroco 90200 Kinabatangan, Sabah, Malaysia
Date of Final Report: 09/05/2022

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Genting Plantations Berhad		
RSPO Membership Number	1-0086-06-000-00	Membership Approval Date	14/11/2006
Address	10th Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Genting Oil Mills (Sabah) Sdn. Bhd - Genting Tanjung Oil Mill		
Location / Address	Mile 97, Sandakan-Lahad Datu Road, Tenegang, Jalan Jeroco 90200, Kinabatangan, Sabah, Malaysia		
Website	http://www.gentingplantations.com		
Management Representative	1) Arunan Kandasamy 2) Choo Huan Boon	E-mail	1) arunan.kandasamy@genting.com 2) huanboon.choo@genting.com
Telephone	03 2333 6510	Facsimile	03 2333 6575

2. Certification Information			
Certificate Number	RSPO 652320	Certificate Start Date	11/01/2022
Date of First Certification	11/01/2017	Certificate Expiry Date	10/01/2027
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 1) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	80 mt/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 692777	MSPO Part 3	BSI Services Malaysia Sdn Bhd	08/08/2023
MSPO 680512	MSPO Part 4		08/08/2023
MSPO 716640	MSPO SCCS		06/10/2024
ISCC-PLUS-CERT-60213796	ISCC	ASG Cert	12/01/2022

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Genting Tanjung Oil Mill	Mile 97, Sandakan-Lahad Datu Road, Tenegang, Jalan Jeroco 90200, Kinabatangan, Sabah, Malaysia	5° 25' 22.80" N	118° 16' 23.90" E
Genting Tanjung Estate		5° 26' 33.41" N	118° 10' 10.23" E
Genting Tenegang Estate		5° 20' 46.02" N	118° 13' 32.20" E
Genting Landworthy Estate		5° 25' 13.40" N	118° 18' 24.60" E
Genting Layang Estate		5° 25' 21.90" N	118° 14' 3.35" E
Genting Bahagia Estate		5° 21' 49.50" N	118° 16' 33.70" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Tanjung Estate	13,959.02	234.96	272.29	4,466.27	88.64
Genting Tenegang Estate	3,420.28	29.75	202.51	3,652.54	93.64
Genting Landworthy Estate	3,695.66	9.87	333.47	4,039.00	91.50
Genting Layang Estate	1,817.80	179.92	79.69	2,077.41	87.50
Genting Bahagia Estate	24,026.94	44.54	355.65	4,427.13	90.96
Total	16,919.70	499.04	1,243.61	18,662.35	90.66

Notes:

¹Reduction of 14.64 ha compared to previous report due to resurvey of area after replanting

²Reduction of 2.48 ha compared to previous report due to resurvey of area after replanting

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6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Tanjung Estate	1,885.66	889.95	198.28	-	985.13	2,073.36	1,885.66
Genting Tenegang Estate	1,318.48	440.32	265.08	-	1,396.40	2,101.80	1,318.48
Genting Landworthy Estate	968.63	-	-	2,133.82	593.21	2,727.03	968.63
Genting Layang Estate	69.68	269.75	-	1,443.88	34.49	1,748.12	69.68
Genting Bahagia Estate	1,504.67	168.67	-	-	2,353.60	2,522.27	1,504.67
Total (ha)	5,747.12	1,768.69	463.36	3,577.70	5,362.83	11,172.58	5,747.12

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Jan 2021-Dec 2021)	Actual (Mar 2021-Oct 2021)		Forecast (Jan 2022-Dec 2022)
		Previous license period (NA – covered during previous audit)	Current license period (Mar 2021-Oct 2021)	
Genting Tanjung Estate	48,050.00	NA	31,334.64	43,180.00
Genting Tenegang Estate	48,690.00	NA	26,291.66	43,510.00
Genting Landworthy Estate	60,670.00	NA	31,092.69	48,940.00
Genting Layang Estate	40,130.00	NA	22,188.84	34,450.00
Genting Bahagia Estate	53,440.00	NA	25,595.79	49,220.00
Total	250,980.00		136,503.62	219,300.00

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Jan 2021-Dec 2021)	Actual (Mar 2021-Oct 2021)		Forecast (Jan 2022-Dec 2022)
		Previous license period (NA – covered during previous audit)	Current license period (Mar 2021-Oct 2021)	
Nil				
Total				

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Jan 2021-Dec 2021)	Actual (Mar 2021-Oct 2021)		Forecast (Jan 2022-Dec 2022)
		<i>Previous license period (NA – covered during previous audit)</i>	<i>Current license period (Mar 2021-Oct 2021)</i>	
Syarikat Yu Kwang Development Sdn Bhd			5,244.19	
Malbumi Estate Sdn Bhd			2,723.09	
Tentu Murni Sdn Bhd			7,934.52	
Winking Plantation Sdn bhd			5,832.13	
Tenera Eco Plantation Sdn bhd			1,545.39	
Chong Lip Chong			178.72	
Tey Ah Bu Plantation Sdn bhd			1,177.36	
Anchor Prospects sdn bhd			989.88	
Harus Permai Sdn Bhd			781.72	
V.K Kalyanasundram Platations Sdn bhd			5,403.77	
Matsu Green Sdn Bhd			691.41	
Green Palm			691.78	
Total			33,193.96	

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9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Mar-21	15,518.73	3,717.73	19,236.46
2	Apr-21	15,232.13	3,357.60	18,589.73
3	May-21	17,352.02	3,528.36	20,880.38
4	Jun-21	16,472.32	2,932.78	19,405.10
5	Jul-21	15,350.88	2,939.90	18,290.78
6	Aug-21	17,723.44	3,516.48	21,239.92
7	Sep-21	18,773.37	4,108.45	22,881.82
8	Oct-21	20,080.73	3,903.24	23,983.97
TOTAL		136,503.62	28,004.54	164,508.16

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (Jan 2021-Dec 2021)	Actual (Mar 2021-Oct 2021)		Forecast (Jan 2022-Dec 2022)
	<i>Previous license period (NA – covered during previous audit)</i>	<i>Current license period (Mar 2021-Oct 2021)</i>	
FFB	FFB		FFB
250,980.00 mt	-	136,503.62 mt	219,300.00 mt
CPO (OER: 21.00%)	CPO (OER: 20.16%)		CPO (OER: 20.54%)
52,705.80 mt	-	27,913.97 mt	45,038.00 mt
PK (KER: 6.37%)	PK (KER: 4.74%)		PK (KER: 4.92%)
15,975.67 mt	-	6,442.97 mt	10,781.00 mt

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Mar-21	3,116.90	718.13
2	Apr-21	3,134.01	732.26
3	May-21	3,489.61	828.91
4	Jun-21	3,414.80	765.90
5	Jul-21	3,117.76	684.43

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6	Aug-21	3,638.57	811.69
7	Sep-21	3,776.10	902.02
8	Oct-21	4,226.20	999.64
TOTAL		27,913.97	6,442.97

11. Summary of Actual Volume sold					
Current License period (Mar 2021 – Oct 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	18,084.02	1,194.16	-	8,971.11	28,249.29
PK (MT)	6,046.13	-	-	428.22	6,474.35
Credits	-	-	-	-	-
Notes: Sales of certified CPO is more by 335.32 mt and PK is more by 31.38 mt due to balance carried forward from Feb 2021.					
Previous License period (NA – covered during previous audit)					
CPO (MT)	-	-	-	-	-
PK (MT)	-	-	-	-	-
Credits	-	-	-	-	-

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Non-disclosure A	-	18,084.02	-
2	Non-disclosure B	-	-	4,756.66
3	Non-disclosure C	-	-	1,289.47
TOTAL			18,084.02	6,046.13

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11B. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Non-disclosure D	ISCC	1,194.16	-
TOTAL			1,194.16	-

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Non-disclosure E	7,262.62	
2	Non-disclosure F	413.39	
3	Non-disclosure G	1,295.10	
4	Non-disclosure H	-	428.22
TOTAL		8,971.11	428.22

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil		
TOTAL			

12. Independent Smallholders Certified Tonnage / Volume – NA									
Phase	Estimated last year <i>(key in period)</i>			Actual <i>(key in period)</i>			Forecast <i>(key in period)</i>		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB									
IS-CSPO									
IS-CSPKO									
IS-CSPKE									

13. Independent Smallholders Actual Sold Tonnage / Volume – NA						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period <i>(key in period)</i>						
Credits						
Physical						

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 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 15-17/11/2021. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on 12/10/2021. https://www.bsigroup.com/globalassets/localfiles/en-my/rspo/Public%20Notification/2021/11-02-rspo-public-notification_recertification_genting-tanjung-oil-mill--supply-base_english.pdf

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

The Critical NC close out on-site assessment was conducted on 12/02/2021. It was remotely conducted using MS Teams since desktop verification deemed to be sufficient to close the NCR. The audit programs are included in Section 2.3.

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

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

Meetings were held with stakeholders to seek their views on the performance of the 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 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

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of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (RC1)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Genting Tanjung Oil Mill	✓	✓	✓	✓	✓
Genting Tanjung Estate		✓			✓
Genting Tenegang Estate	✓		✓		
Genting Landworthy Estate			✓		✓
Genting Layang Estate	✓			✓	
Genting Bahagia Estate		✓		✓	

Tentative Date of Next Visit: November 14, 2022 - November 16, 2022

Total Number of Mandays: 9.0

2.2 BSI Assessment Team

Name	Role	Competency
Valence Shem (VSH)	Team Leader	<p>Education: BTech (Hons) Bachelor Degree in Industrial Technology, University of Science Malaysia</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1) 9 years working experience in oil palm plantation industry 2) Management system auditing since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS, MSPO and SMETA <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 14001 Lead Auditor Course 2) ISO 9001 Lead Auditor Course 3) Endorsed RSPO P&C Lead Auditor Course 4) Endorsed RSPO SCCS Lead Assessor Course 5) MSPO Awareness Training 6) ISO 45000 Lead Auditor Course 7) SMETA Auditor training 8) HCV-HCS training 9) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course <p>Aspect covered in this audit: Legal requirements, wastes management, environmental aspects, occupational health and safety, GAP, training, and economic management plan</p> <p>Language proficiency: English and Bahasa Malaysia</p>
Hu Ning Shing (HNS)	Team Member	<p>Education: Bachelor Degree in Science majoring in Applied Chemistry, University of Malaya</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1) 5 years working experience in rubber and palm oil industry 2) Auditor for several standards including ISO 9001, MSPO and RSPO since 2015 <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 9001 Lead Auditor Course 2) Endorsed RSPO P&C Lead Auditor Course 3) MSPO Awareness Training

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		<p>4) Endorsed RSPO SCCS Lead Auditor Course 5) RSPO Social Audit Training 6) SMETA Auditor training</p> <p>Aspect covered in this audit: Legal requirements, policies and commitment, social aspects, contract agreement, human rights, land use rights, and workers' welfare</p> <p>Language proficiency: English and Bahasa Malaysia</p>
Vijay Kanna Pakirisamy (VKP)	Team Member	<p>Education: Bachelor's Degree in Agribusiness Science Management with Honours from University Utara Malaysia</p> <p>Work Experience: 1) 10 year tenure in the oil palm industry – Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad</p> <p>Training attended: 2) ISO IMS 9001 3) ISO 14001 Lead Auditor Course 4) ISO 45001(OHS 18001) 5) Endorsed RSPO P&C Lead Auditor Course 6) Endorsed MSPO Lead Auditor Course 7) SMETA Auditor training 8) HCV-HCS training</p> <p>Aspect covered in this audit: Legal requirements, natural and HCV conservation, water & wastes management, environmental aspects, GAP, mill best practices, training, and economic management plan</p> <p>Language proficiency: English and Bahasa Malaysia</p>
Dr. Suhaili Bin Sahari	Peer Reviewer	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p>

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		<p>Work Experience:</p> <p>Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 9001:2015 Lead Auditor and Internal Auditor 2) TS16949 3) Safety 4) ISO 14001: 2015 Standard 5) RSPO Standards: RSPO P&C 2018 MY-NI 2019 6) MSPO Standards: MS 2530: 2013 part 1, 2 , 3 and 4 7) Problem Solving Technique: 8 D, ICC, QCC, Systematic PS 8) HACCP MS 1480:2019 <p>GAP Standard: Global GAP, Euru GAP</p>
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Accompanying Persons:

Name	Role
Nil	

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2.3 Assessment Plan

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

Date	Time	Subjects	VSH	HNS	VKP
Monday 15/11/2021	0900-0915	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) 	✓	✓	✓
	0915-1230	GTOM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	✓	✓	✓
	1000-1200	Stakeholder consultation Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-
	1230-1330	Lunch break			
	1330-1630	GTOM Document Review P1 – P7: SOPs, Supply chain, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓
	1630-1700	Interim closing briefing	✓	✓	✓
Tuesday 16/11/2021	0900-1230	GLYE 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, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓
	1230-1330	Lunch break			
	1330-1630	GLYE Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓
	1630-1700	Interim closing briefing	✓	✓	✓

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Wednesday 17/11/2021	0900-1230	GTGE 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, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓
	1230-1330	Lunch break			
	1330-1600	GTGE Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓
	1600-1630	Audit team discussion & preparation for closing meeting	✓	✓	✓
	1630-1700	Closing meeting	✓	✓	✓

Critical NCR Close-out verification

Date	Time	Subjects	VSH	ICT planned
Saturday 12/02/2022	0900-0915	Opening briefing by audit team leader	✓	MS Teams, whatsapp, email, Google drive, etc.
	0915-1230	Verification of effective implementation of corrective actions for the following NCR: <ul style="list-style-type: none"> • 2130489-202111-M1 • 2130489-202111-M2 	✓	
	1200-1230	Closing meeting – conclusion and recommendation	✓	

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	The time bound plan has included all the subsidiaries of Genting Plantations Berhad. The TBP includes all units in Malaysia and Indonesia. The detail of the subsidiaries and the management units is as per Approved Time Bound Plan below.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	No. As stated in the updated time bound plan, the management of Genting Plantations Berhad has plan to certify all the complexes until October 2023. The updated time bound plan dated 09/11/2021 shows that the plan spans from year 2014 until year 2023. The delays are due to the following factors: 1) Some estates in Indonesia are in progress to obtain their Hak Guna Usaha (HGU). 2) PT SP, KMJ, DWK is in the process of obtaining Forest Release and Forest Exchange prior to HGU application. 3) RACP in progress for Genting Kencana Estate. 4) Standalone HCSA reports are in progress to be peer reviewed. 5) NPP in progress for PT SISM, PT SMA (additional areas) and PT KIU	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	No new acquisitions as of Nov 2021. Nonetheless, there is a three parts of expansion of land area at PT Sepanjang Inti Surya Mulia i.e. Area 199 Ha, Area 100 Ha and Area 1300 Ha. As per comment in table below, the required assessments were being conducted and in progress.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No changes in the 100% certification targets, except for adjustment of dates for planned certification.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	There are no lapses in implementation of the plan.	Complied

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<p>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</p>	<p>There are no fundamental failure in implementation of the plan.</p>	<p>Complied</p>
Un-Certified Units or Holdings		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>NPP documents are publicly available at the RSPO website. Registered HCSA reports Completed Peer Review Reports are published at:</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>http://highcarbonstock.org/registered-hcsa-assessments/ Completed Peer Reviewed HCV reports: PT Agro Abadi Cemerlang: https://hcvnetwork.org/find-a-report/?acs-action=advanced-search PT Kharisma Inti Usaha: https://hcvnetwork.org/find-a-report/?acs-action=advanced-search PT Sawit Mitra Abadi: https://hcvnetwork.org/find-a-report/?acs-action=advanced-search PT Palma Agro Lestari Jaya: https://hcvnetwork.org/find-a-report/?acs-action=advanced-search PT United Agro Indonesia: https://hcvnetwork.org/find-a-report/?acs-action=advanced-search</p>	<p>Complied</p>
<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 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No outstanding land conflicts.</p> <p><u>Indonesian Operating Units</u> SOP - CPD – 02-00.00 Mekanisme Penyelesaian Sengketa Lahan</p> <p><u>Malaysian Operating Unit</u> SMP-GPB-18 Negotiation, Compensation and Handling Procedures.</p> <p>At the point of this assessment, based on the RaCP Tracker, Genting Plantations Berhad, has a total of 4 submitted LUCA which 3 of them have completed the review. There are 2 Concept Notes required which 1 of them has been submitted and approved. 3 Remediation Plans are required which 1 of them has been submitted.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in</p>	<p>No outstanding labour disputes.</p>	<p>Complied</p>

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accordance with RSPO P&C criterion 4.2	<u>Indonesian Operating Unit</u> SOP - HRD-04-00.00 Penyelesaian Keluh Kesah <u>Malaysian Operating Unit</u> SMP-GPB-19 Complaints and Grievances	
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	In progress to obtain Hak Guna Usaha (HGU). Refer to TBP (9 Nov 2021)	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. Sustainability Dept conducts the internal audit. Positive Assurance Statement 2021 was made available for verification.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	None raised.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	NA	Complied

Approved Time Bound Plan

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of November 2021	Any unresolved non-compliances
1	Genting Plantations (WM) Sdn Bhd & Setiamas Sdn Bhd (100%)for estates Genting Oil Mill Sdn Bhd (100%) for mill	Genting Sri Gading Estate	Supply base for Genting Ayer Item Oil Mill, Johor, Malaysia	Dec,2014	Certified	None
2		Genting Sungei Rayat Estate				
3		Genting Kulai Besar Estate				
4		Genting Tanah Merah Estate		Dec,2015		
5		Genting Tebong Estate		July, 2015		
6	Genting Plantations (WM) Sdn Bhd (100%)for estate	Genting Selama Estate, Kedah, Malaysia		July 2019	Certified	None
7	Genting Oil Mills (Sabah) Sdn Bhd (100%) for Mill Genting Plantations Berhad (Estate)	Genting Sabapalm Estate, Sabah, Malaysia	Supply base for Genting Sabapalm Oil Mill, Sabah, Malaysia	Aug,2015	Certified	None
8	Genting Tanjung Bahagia Sdn Bhd (100%) for estates Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Tanjung Estate, Sabah, Malaysia	Supply base for Genting Tanjung Oil Mill, Sabah, Malaysia	Aug,2016	Certified	None
9		Genting Tenegang Estate, Sabah, Malaysia				
10		Genting Layang Estate, Sabah, Malaysia				
11		Genting Bahagia Estate,				
12	Landworthy Sdn Bhd (84%)	Genting Landworthy Estate, Sabah, Malaysia				

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13	Genting Tanjung Bahagia Sdn Bhd (100%) for estates	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah Oil Mill, Sabah, Malaysia	July,2022		Concept Note for RACP approved on 19/11/2021. RACP plan submitted and awaiting for approval.
14	Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Permai Estate, Sabah, Malaysia				
15		Genting Kencana Estate, Sabah, Malaysia				
16	Genting Oil Mills (Sabah) Sdn Bhd (100%) for estate and mill	Genting Jambongan Estate, Sabah, Malaysia	Supply base for Genting Jambongan Oil Mill, Sabah, Malaysia	Sept 2019	Certified	None
17	Genting Plantations Bhd Wawasan Land Progress Sdn Bhd (100%) Genting Oil Mills (Sabah) (Mill)	Genting Sekong Estate, Sabah, Malaysia	Supply base for Genting Trushidup Oil Mill, Sabah, Malaysia	Sept,2017	Certified	None
18	Asiaticom Sdn Bhd (100%) Sawit Sukau Usahasama Sdn Bhd(56%)	Genting Suan Lamba Estate, Sabah, Malaysia				
19	PT Sepanjang Intisurya Mulia (70%)	Mulia 1 & 2 Mulia 3 & 4 Mulia 5 & 6	Supply base for Mulia Oil Mill, Kalimantan, Indonesia	Oct, 2017	Certified	None
20	PT Sawit Mitra Abadi (70%)	Abadi 1 & 2 Abadi 3 & 4				

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21	PT Sepanjang Intisurya Mulia (70%)	Area 199 Ha Area 1300 Ha	Supply base for Mulia Oil Mill, Kalimantan, Indonesia	Oct,2023		In Process of NPP In Process of NPP In process of obtaining HGU.
22	PT Sawit Mitra Abadi (70%)	Area 1000 Ha				NPP Process In process of obtaining HGU. HCS Report completed peer review.
23	Genting Plantations Berhad (100%)Estate Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Mewah Estate, Sabah, Malaysia	Supply base for Genting Mewah Oil Mill, Sabah, Malaysia	Mar,2017	Certified	None
24	Genting Plantations (WM) Sdn Bhd (100%)	Genting Bukit Sembilan Estate, Kedah, Malaysia		July,2017	Certified	None
25	PT Globalindo Agung Lestari (60%)	Lamunti Barat Estate Lamunti Timur Estate I &II Mangkatip Estate I & II Bakuta Estate Plasma Timur & Barat	Supply base for Globalindo Oil Mill, Kalimantan, Indonesia	Aug, 2022		NPP and HCSA Report completed for PT UAI. In the process of obtaining HGU for UAI.

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26	PT United Agro Indonesia(60%)	PT UAI 1 & 2 UAI Plasma		Oct, 2023		
27	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		
28	PT Kapuas Maju Jaya (95%)	Waterfall Estate I & II Muhun Estate I & II Talawang Estate I & II	Supply bases for Golden Hill Oil Mill, Kalimantan Indonesia	Oct, 2023		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		KMJ Plasma		Oct, 2023		
29	PT Dwie Warna Karya (95%)	Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate		Oct, 2023		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		DWK Plasma		Oct, 2023		
30	PT Citra Sawit Cemerlang (70%)	CSC Estates	Supply base for Mulia Oil Mill	Oct, 2023		In process of obtaining HGU. HCSA report completed review.

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31	PT Surya Agro Palma (70%)	SAP Estate 1&2 SAP Estate 3&4 SAP Estate 5&6	Supply base for Cemerlang Oil Mill, Kalimantan, Indonesia	Sept, 2023		In process of obtaining HGU. HCSA report completed review.		
		Plasma		Sept, 2023				
32	PT Agro Abadi Cemerlang (70%)	AAC 1 & 2		Plasma – KSK1, KMB, BSL		Sept, 2022		In process of obtaining HGU. HCSA report completed review. Report not published yet.
		AAC 3 & 4				Sept, 2023		
33	PT Palma Agro Lestari Jaya (70%)	PALJ Estates	Dec,2023			In process of obtaining HGU. HCSA report completed review.		
		PALJ Plasma						
34	Knowledge One Investment Pte Ltd (85%)-PT Kharisma Inti Usaha (KIU)	KIU 1 & 2 KIU 3 & 4	Supply base for KIU Oil Mill	July,2022		NPP in progress. HCV report approved by HCVRN. HCSA report is completed and waiting for peer review.		
		KIU Plasma		July 2022				

3.3 Details of Nonconformities

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

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

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

Non-conformity			
NCR Ref #	2130489-202111-M1	Date Issued	17/11/2021
Due Date	14/02/2022	Date of nonconformity Closure	12/02/2022
Clause & Category (Critical / Minor)	2.1.1 (Critical)		
Statement of Nonconformity:	Compliance of legal requirements was not effectively implemented.		
Requirement Reference:	The Unit of Certification complies with legal requirements.		
Objective Evidence:	<p><u>Genting Tanjung Oil Mill</u></p> <p>Refer to approval from <i>Jabatan Tenaga Kerja Sabah</i> (S/N: 600-1/2/13/9 Jld.6(05/KBN/2020-0231) which valid until 23/07/2022) for female to work from 10pm to 5am, GTOM did not comply with the Clause 1.6 - to pay night shift allowance at the rate agreed between workers and employers stated in the employment contract. Sampled one of the female workers' payslips and punch card for October 2021 (Employee No.: E00087) found that she worked at night shift without paying shift allowance.</p> <p><u>Genting Tenegang Estate</u></p> <p>Genting Tenegang Estate has obtained approval from <i>Jabatan Tenaga Kerja Sabah</i> (S/N: 600-1/2/13/9(11/KBN/2019-0170) to make deduction of wages of workers for the following purposes:</p> <ol style="list-style-type: none"> i. Travel document processing cost (excluded levy, bank guarantee, agent fee and medical check-up) ii. Passport for dependent iii. Medical cost iv. Loan for purchase buffalo <p>The permit was expired on 18/06/2021. Renewal of the permit was submitted on 17/11/2021 as verified the email correspondence to Genting HQ in Sandakan. However, the management continue to make deduction of wages for travelling documents and loan for purchase buffalo as verified in the payslips of October 2021 and monthly account analysis report.</p>		

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Corrections:	<p>Genting Tanjung Oil Mill – Mill management will conduct the discussion with all the women workers to come out with an agreeable rate for the night shift allowance. Mill will begin to pay the night shift allowance to all women workers.</p> <p>Genting Tenegang Estate – Estate PIC in Legal requirement which is the Chief Clerk, will follow up on the status for the JTK license renewal and estate will immediately stop any deduction from workers salary starting November 2021.</p>
Root Cause Analysis:	<p>Since the enforcement of the Movement Control Order, there are no proper monitoring done by the SD to check on the continuous compliances and implementations on the legal requirements and company’s Sustainability Management Procedures on each Operating Unit.</p>
Corrective Actions:	<p>Since the Movement Control Order has been lifted and Sabah has been declared as PPN Fasa 4, SD will continue to conduct the monitoring of the continuous compliances and implementations on the legal requirements and company’s Sustainability Management Procedures on each Operating Unit in each quarterly visit to the operating unit and in the next RSPO Internal Audit.</p>
Assessment Conclusion:	<p>Evidence verified:</p> <p><u>GTOM</u></p> <ol style="list-style-type: none"> 1) Minutes of meeting dated 08/12/2021 that shows the discussion with all the women workers to come out with an agreeable rate for the night shift allowance has been conducted. The meeting was attended by 10 female employees and chaired by the Mill Manager. 2) Pay slips for the month of Dec 2021 that show the night shift allowance to all women workers involved have been paid by the mill 3) Social management plan dated 07/12/2021 that shows the unpaid night shift allowance starting from July 2020 (as stipulated in the permit) will be reimbursed in Feb 2022 4) Monitoring records (Sustainability Department Visit) dated 21/01/2022 that show the continuous compliances and implementations on the legal requirements and company’s Sustainability Management Procedures for the GTOM has been inspected <p><u>GTGE</u></p> <ol style="list-style-type: none"> 1) The status for the JTK license renewal has been followed up by the Chief Clerk through e-mails. The last response from the JTK was on 05/01/2021 and the last follow-up by the estate was on 21/01/2022. 2) Pay slips for Nov and Dec 2021 that show the deductions from the sampled workers salary have been stopped 3) Monitoring records (Sustainability Department Visit) dated 21/01/2022 that show the continuous compliances and implementations on the legal requirements and company’s Sustainability Management Procedures for GTGE has been inspected <p>The evidence of corrections and corrective actions were found to be adequate to close the NCR. Continuous effective implementation shall be verified in the next assessment visit.</p>

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Non-conformity			
NCR Ref #	2130489-202111-M2	Date Issued	17/11/2021
Due Date	14/02/2022	Date of nonconformity Closure	12/02/2022
Clause & Category (Critical / Minor)	3.3.2 (Critical – escalated from previous Minor NC)		
Statement of Nonconformity:	There was no mechanism to check consistent implementation of procedures.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<p><u>Genting Tanjung Oil Mill</u></p> <p>Site visit to the sundry shop, Tasmiasi Lapadeng found that one of the workers was 15 years old. This has verified with the birth certificate provided by the sundry shop’s owner. However, the tenant has employed young person which is not comply with the tenancy agreement signed dated 01/01/2021, under Schedule 3, Clause vii, the tenant shall comply to no employment of minors (below 18 years old).</p> <p><u>Genting Tenegang Estate</u></p> <p>The last review of the social management plan in GTGE was conducted on 20/09/2018 and the latest was on 08/11/2021. This is not accordance to the Social Management Procedure (Doc. No.: SMP-GPB-32, Rev. 1 dated April 2021), under Clause 6.1.6 where the plan shall be reviewed and updated at least once in 2 years.</p> <p>This is recurrence of minor non-conformance of the same indicator and thus, this minor non-conformance escalated to major non-conformance.</p>		
Corrections:	<p>Genting Tanjung Oil Mill – A memo will be issued to the Tenancy to immediately stop the minor age workers from working in the sundry shop. The tenancy also will be re-brief on the tenancy agreements requirement that they need to comply.</p> <p>Genting Tenegang Estate – A review of Social Management Plan for the year 2020 will be produced. The PIC on Social Management in the estate will be re-brief on the sustainability procedure requirement, SMP-GPB-32 - Social Management Procedure, that the Social Management Plan shall be review once in 2 years.</p>		
Root Cause Analysis:	Since the enforcement of the Movement Control Order, there are no proper monitoring done by the SD to check on the continuous compliances and implementations on the legal requirements and company’s Sustainability Management Procedures on each Operating Unit.		
Corrective Actions:	Since the Movement Control Order has been lifted and Sabah has been declared as PPN Fasa 4, SD will continue to conduct the monitoring of the continuous compliances and implementations on the legal requirements and company’s Sustainability Management Procedures on each Operating Unit in each quarterly visit to the operating unit and in the next RSPO Internal Audit.		
Assessment Conclusion:	Evidence verified:		

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	<p><u>GTOM</u></p> <ol style="list-style-type: none"> 1) Copy of the memo dated 16/11/2021 [ref.: GTOM/2021/11/05] has been issued to the tenant describing that she has to immediately stop the minor worker from working at the sundry shop 2) Minutes of meeting dated 04/12/2021 that show the tenant has been re-briefed on the tenancy agreements requirements. The meeting was chaired by the Mill Manager. 3) Monitoring records (Sustainability Department Visit) dated 21/01/2022 that show the continuous compliances and implementations on the legal requirements and company's Sustainability Management Procedures for the GTOM has been inspected <p><u>GTGE</u></p> <ol style="list-style-type: none"> 1) Copy of latest reviewed Social Management Plan dated 07/01/2022 2) Record dated 14/12/2021 that shows the PIC on Social Management in the estate has been re-briefed on the sustainability procedure requirement, SMP-GPB-32 (Procedure of Social Management Plan) 3) Monitoring records (Sustainability Department Visit) dated 21/01/2022 that show the continuous compliances and implementations on the legal requirements and company's Sustainability Management Procedures for GTGE has been inspected <p>The evidence of corrections and corrective actions were found to be adequate to close the NCR. Continuous effective implementation shall be verified in the next assessment visit.</p>
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Non-conformity			
NCR Ref #	2130489-202111-N1	Date Issued	17/11/2021
Due Date	Next assessment visit	Date of nonconformity Closure	Open
Clause & Category (Critical / Minor)	2.1.3 (Minor)		
Statement of Nonconformity:	There were planting beyond the legal boundaries in the estate.		
Requirement Reference:	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.		
Objective Evidence:	<p><u>Genting Layang Estate.</u></p> <p>Visit to the boundary markers at Field 22 (1 marker) and Field 23 (2 markers), (Lat. 005° 24'31" N, Lon. 118° 13'44" N), boundary with Government Reserve (Road), witnessed that the estate has planted beyond the existing markers into the Government Reserve (Road) area along the 3 sampled points at the fields mentioned above.</p>		
Corrections:	For immediate action, estate will count and clearly marking all the palms outside the boundary markings to determine the hectare of overplanted and abandoned the area by living it as it and stop any work activities in the area including Harvesting.		

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Root Cause Analysis:	During land clearing in 1995/96, the original boundary stone was not found and the planting was done based on map during that time. Re-survey was done in 2018 by authorized surveyor to install back the boundary stones as per estate land title area and identified that there is a planting area beyond the boundary, on the Government Reserve Road. However, there is no action plan produced by the estate management after the re-survey is done.
Corrective Actions:	Estate management will come out with the action plan for the area. As per pre-planned, the area beyond the existing marker will be abandoned and also will not include in replanting program. Based on replanting program for GLYE, Block 22 will be replant on 2022 and Block 23 will be replant on 2023.
Assessment Conclusion:	The correction and corrective action plan are accepted. The evidence of effective implementation of the corrective action shall be verified in the next assessment.

Non-conformity			
NCR Ref #	2130489-202111-N2	Date Issued	17/11/2021
Due Date	Next assessment visit	Date of nonconformity Closure	Open
Clause & Category (Critical / Minor)	3.4.2 (Minor)		
Statement of Nonconformity:	The social management plan has not completed comprehensively.		
Requirement Reference:	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.		
Objective Evidence:	There was a change of payment method of wages from cheque to Merchant Trade Card since July 2021 in both estates. However, the impact of the changes was not identified and not included in the social management plan.		
Corrections:	SD will re-conduct the SEIA and to identified the impact of the change of worker's payment method of wages from cheque to Merchant Trade Card.		
Root Cause Analysis:	The Sustainability Team was not informed by the estate that there was a change of payment method for their workers salary.		
Corrective Actions:	SD to conduct briefing to all estates and mill, any new changes to the current practices/system that related to sustainability requirement, must be inform to the sustainability team, so that any sustainability related pre-assessment can be done before the new changes to the current practices/system is implemented.		
Assessment Conclusion:	The correction and corrective action plan are accepted. The evidence of effective implementation of the corrective action shall be verified in the next assessment.		

Opportunity for Improvements	
OFI #	Description

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2130489-202111-I1	<p><u>Indicator 3.4.1</u> At GLYE, the monitoring of Environmental Monitoring & Compliance Audit for replanting can be further improved to ensure it is delivered on timely manner.</p>
2130489-202111-I2	<p><u>Indicator 3.4.2</u> The SEIA and the list of stakeholders of GLYE can be further improved by including the villagers from Kampung Bilit and Kampung Sukau as they are confirmed by the management to be doing fishing activities at Tenegang Besar River and occasionally left their empty lubricants drums at the riverbank within the estate.</p>
2130489-202111-I3	<p><u>Indicator 7.3.1</u> The monitoring of trips of tractors collecting domestic wastes at the labour quarters can be further improved to ensure they are disposed at the designated landfill.</p>

Positive Findings	
PF #	Description
PF 1	Very good cooperation and hospitality by management team/staff/sustainability team
PF 2	Prompt retrieval of relevant documents by the management team
PF 3	Good awareness on sustainability aspects among the workers and stakeholders

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1988112-202011-M1	Clause & Category (Critical (Major) / Minor)	2.3.1 (Critical)
Date Issued	18/11/2020	Due Date	15/02/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	18/01/2021
Statement of Nonconformity:	Evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder was not available for FFB Suppliers.		
Requirement Reference:	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 		
Objective Evidence:	A list of all directly sourced FFB is available. It has the information about names of the suppliers, MPOB License number, geo-location and address. So far there were 13 suppliers registered from outside the certification scope. However, the evidence to show the status of the third party FFB suppliers land ownership for example Land Application (LA), letter from Land & Survey Department, Surat Tuai Rumah/ Ketua Kampung, letter from Jabatan Kemajuan Orang Asli (JAKOA) (for Peninsular), Temporary Occupation Lease (TOL), Provisional Lease or Alienated Land was not available for verification.		
Corrections:	Mill will send memo to all the FFB supplier requesting them to submit their copy of land title, LA/PT and other related documents for mill filling. Sustainability Department will make sure all document on ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder for all the FFB Supplier to Genting Tanjung Oil Mill will be available and filled in the mill office. This matter will be further verified during routine visit and in the next RSPO internal audit.		
Root Cause Analysis:	The clause requirement on requesting supporting document on ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder was not stated in the Mill Procedure, PM-MKT-04 - Supplier Evaluation, Selection & Monitoring (Direct Material), hence, Genting Tanjung Oil Mill haven't request it from all the FFB supplier (3rd party direct FFB supplier).		
Corrective Actions:	The Mill procedure in managing new and existing supplier, PM-MKT-04 - Supplier Evaluation, Selection & Monitoring (Direct Material) will be amended to include in the clause requirement on evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder.		
Assessment Conclusion:	NC close out verification: SOP for PM-MKT-04 - Supplier Evaluation, Selection & Monitoring (Direct Material), dated 2nd January 2021 rev:1 has been revised to include clause requirement on evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder. Related evidences for legality was obtained by Genting Tanjung POM for Ace Foremost and Winking Plantation Sdn Bhd. The evidences submitted were found to be suffice and effective to close the NC on 18/1/21. Continuous implementation will be further verified in the next surveillance assessment		

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RAV Verification	<p>A list of all directly sourced FFB is available for verification in the Genting Tanjung Oil Mill Approved Supplier List – FFB Supplier. It has the information about names of the suppliers, MPOB License number, geo-location and the status of the third party FFB suppliers land ownership.</p> <p>GTOM receives RSPO certified FFB from 5 of its own estates such as Genting Tanjung Estate, Genting Bahagia Estate, Genting Tenegang Estate, Genting Landworthy Estate and Genting laying Estate. The mill also receives non-certified FFB from 6 estates and 6 smallholders registered from outside the certification scope. The information related to the third party FFB suppliers were available for verification. Therefore, the major non-conformity remains closed.</p>
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Non-conformity			
NCR Ref #	2036809-202103-M1	Clause & Category (Critical (Major) / Minor)	7.10.3 (Critical)
Date Issued	24/03/2021	Due Date	22/06/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	04/06/2021
Statement of Nonconformity:	Implementation and monitoring of significant pollutants were not effectively managed.		
Requirement Reference:	Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.		
Objective Evidence:	<p>Observed during field visit at block 8 (Landworthy Estate);</p> <ul style="list-style-type: none"> i) Oil/lubricant containers were placed directly on the ground which lead to soil contamination. No proper waste storage area sighted. ii) Environmental mitigation at skid tank was not made available to reduce risk of pollution. Soil contamination was observed at nozzle/pump area. iii) Secondary containment was not available for the drum filled with diesel and placed directly on the ground. iv) Temporary workshop shed was built near to field drain. Workshop activities carried out at the area contaminating the ground soil where there was no concrete slab to mitigate pollution. 		
Corrections:	<p>Estate will re-brief and conduct training to the contractor management and workers on company's Environment Policy and Procedures including Procedure of Scheduled Waste Management.</p> <p>All scheduled waste i.e contaminated soil, used lubricant containers and used lubricant oil will be stored in the estate's scheduled waste store and recorded. The skid tank will be removed out from the estate and the area will be cleared from pollutions. The contractors will get diesel fuel through estate's skid tank. Dedicated tray will be provide to drums that used to store and distributed diesel. The temporary workshop will not be allowed and it will be cleared. All mechanical job must be done in estate workshop</p>		
Root Cause Analysis:	All the pollution sighted at contractor's machinery parking area. The contractor failed to demonstrate compliance to the agreement signed with the estate, indicates that value of work of the contractor must include compliances to company's Environment Policy and Procedures including Procedure of Scheduled Waste Management.		

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Corrective Actions:	Estate team will be monitoring the contractor activities including conducting monthly workplace inspection to avoid any recurrent polluting activities. Any new appointed contractor will be brief and provided with training on company's Environment Policy and Management Procedures. This matter will also be monitored by sustainability department in monthly basis and in the next RSPO internal audit.
Assessment Conclusion:	<p>Remote Major NC close out verification:</p> <ul style="list-style-type: none"> i) Briefing to the respective contractor (Generasi Beringin Sdn Bhd) was done on 31/3/2021. Records of training was verified which has covered on Genting Plantations Berhad's environmental management procedures and policies. ii) Contaminated soils was cleared together with other type of waste generated onsite. iii) Skid tank was removed from temporary site. All diesel issuance will be through estate's skid tank. iv) Secondary containment/tray and ERP kit provided to the contractor for distribution of diesel. v) No more temporary workshop placed at field area for the contractor. Only temporary shelter allowed for rest area. vi) Monthly inspection was carried out by OSH committee on 8/5/21 to monitor contractor activities in the estate. vii) Monitoring on the contractor activities in the estate was discussed in the meeting Sustainability Management Team. The latest meeting minute dated 26/3/21 was verified. <p>Implemented corrective action found to be adequate to close the NC effectively on 4/6/21. Continuous implementation will be further verified in the next assessment</p>
RAV Verification	Based on the site visits at the two sampled estates, contractors have been implementing good housekeeping practice at their temporary shelter. Contaminated soils have been cleared and secondary containment/tray were available should there be any minor repairs necessary. Diesel supply is managed by the estates. No recurrence of non-conformity observed. Thus, the NCR remains closed.

Non-conformity			
NCR Ref #	2036809-202103-M2	Clause & Category (Critical (Major) / Minor)	3.6.2 (Critical)
Date Issued	24/03/2021	Due Date	22/06/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	04/06/2021
Statement of Nonconformity:	The Existing Control Measures stated in the HIRARC was not effectively implemented		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	<ul style="list-style-type: none"> a) HIRARC for Shovel & Tractor Driver; Record Number: SP-MGR-01-F01-0; Rev:06; Activiti: Beroperasi dalam Kawasan Kilang; Kawalan Sedia Ada: Topi Keselamatan. It was noticed during the site visit to the ramp at the mil that the Shovel Driver was not wearing appropriate PPE (Safety Helmet). b) HIRAC for FFB Grading: SP-MGR-01-F01-0; Rev: 05; Activiti: FFB Grading; Mengred Buah & Pungut/Sapu LF; Kawalan Sedia Ada: PPE – Kasut 		

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	Keselamatan. It was noticed during the site visit to the ramp at the mill that the FFB Grader was not wearing appropriate PPE (Safety Shoe) as the worker was wearing Wellington Boots.
Corrections:	The work station PIC will be re-brief on monitoring of PPE usage by the mill PIC on OSH. The workers will be provided with PPE, Safety helmet and Safety Shoe and will be re-brief and re-training on the HIRARC for Shovel & Tractor driver and for FFB Grading including the PPE requirement by the mill PIC on OSH and monitored by SHO.
Root Cause Analysis:	The implementation of daily monitoring of PPE usage by the work station PIC is not effective.
Corrective Actions:	Briefing and training on monitoring of PPE usage by the PIC of each work station will be done once in 6 month and recorded. It is also will be included in Mill OSH training program for 2021. This matter will be further monitor by SHO on monthly basis.
Assessment Conclusion:	Remote Major NC close out verification: i) Briefing on PPE usage for FFB grading was carried out on 12/04/21. All relevant employees including APs were trained on the importance and PPE compliance while doing work at FFB grading area. ii) PPE issuance records were verified for the FFB grading and shovel drivers. Latest issuance for boots was recorded on 26/4/21. iii) HIRARC for shovel and tractor driver was last reviewed on 5/4/21 and has included control measures such as PPE and administrative control in the register. iv) SHO report dated 19/4/21 was verified and no PPE non-compliance issue reported by SHO. Implemented corrective action found to be adequate to close the NC effectively on 4/6/21. Continuous implementation will be further verified in the next assessment.
RAV Verification	During the mill visit to the workshop, ramp, boiler station and stores, it was identified that all appropriate PPE's such as safety shoes, safety helmets, ear plugs, etc were worn by the workers in the mill workers. Interview with the workers indicated that they were aware of the importance of wearing PPEs during work and are provided continuous training on PPE usages. Therefore, the major nonconformity remains closed.

Non-conformity			
NCR Ref #	2036809-202103-N1	Clause & Category (Critical (Major) / Minor)	3.3.2 (Minor)
Date Issued	24/03/2021	Due Date	17/11/2021
Closed (Yes / No)	No	Date of nonconformity Closure	Escalated to Critical
Statement of Nonconformity:	There was no mechanism to check consistent implementation of procedures.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	i) Genting Plantations Berhad has established Procedures for Social Management (Doc. No.: SMP-GPB-32, Rev. 0 dated 18/01/2018). Under Clause 6.8.2, the workers committee meetings shall be conducted at least quarterly or whenever necessary. However, document reviewed in GTOM,		

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	<p>GBHE and GLWE found that the workers committee meeting was conducted once a year. For e.g.:</p> <table border="1" data-bbox="550 421 1369 557"> <thead> <tr> <th>Estate</th> <th>2018</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td>GTOM</td> <td>14/08/2018</td> <td>14/09/2019</td> <td>04/09/2020</td> </tr> <tr> <td>GBGE</td> <td>26/11/2018</td> <td>24/07/2019</td> <td>17/10/2020</td> </tr> <tr> <td>GLWE</td> <td>19/10/2018</td> <td>27/09/2019</td> <td>04/02/2021</td> </tr> </tbody> </table> <p>ii) Labels must be available for all containers where chemicals are being stored. This is especially for the chemicals which have been transferred from its original packaging and there is potential for it to be kept overnight. An example is diesel containers for use at the genset and workshop. Pesticide mixtures and oils for use by the workshop team are also of no exception. If the contents are used within normal work shift, containers are to be relabel with the chemical name or the trade names written on the original label. If the contents are not used within normal work shift, then the containers shall carry the same labels to that of the original packaging. The requirements is in accordance to OSHA1994 USECHH Regulations 2000 Part VI sub-Regulation 21. During the site visit to the mill workshop, it was noticed that there were several mineral water bottles being used to store lubricants. The container used was not relabeled to identify the actual content</p>	Estate	2018	2019	2020	GTOM	14/08/2018	14/09/2019	04/09/2020	GBGE	26/11/2018	24/07/2019	17/10/2020	GLWE	19/10/2018	27/09/2019	04/02/2021
Estate	2018	2019	2020														
GTOM	14/08/2018	14/09/2019	04/09/2020														
GBGE	26/11/2018	24/07/2019	17/10/2020														
GLWE	19/10/2018	27/09/2019	04/02/2021														
Corrections:	<p>i) Estate and mill to prepare committee meeting schedule for the year 2021 and the schedule to be verified by Mill Manager, Estate Senior Manager and Estate Manager. The Sustainability Department will conduct checking on the schedule compliance during monthly follow up visit.</p> <p>ii) Mill In-charge will conduct briefing and training on labelling of reused container with accordance to OSHA1994 USECHH Regulations 2000 Part VI sub-Regulation 21 to all the mill workshop workers.</p>																
Root Cause Analysis:	<p>i) Frequency of meeting for the Workers Committee (JCC) was not following the procedure requirements due to the PIC was unaware of the SOP requirements</p> <p>ii) The workshop workers is unaware of the Labelling of reused container because there is no training or briefing provided to them on the SOP requirement.</p>																
Corrective Actions:	<p>i) Estate and Mill to schedule its Workers Committee (JCC) meeting to be the same date with OSH Committee meeting. OSH committee meeting was conducted at least once in three month as per OSHA 1994 requirements.</p> <p>ii) Briefing and Training on labelling of reused container will be included in the mill annual training program 2021 and to be conducted once in 6 month. Sustainability department will monitor this implementation in monthly visit and in the next RSPO internal audit.</p>																
Assessment Conclusion:	<p>The corrective action is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.</p>																
RAV Verification	<p>i) GTOM, GLYE and GTGE has developed Sustainability Annual Programme Year 2021 to plan out the meetings for whole year such as Gender Committee and Workers' Committee meeting. However, due to Covid-19 pandemic and MCO, the meeting scheduled on the 1st half of the year was unable to carry out as approved by the Managers. plan. The 2nd half of the meeting was carried out on 31/10/2021 in GTOM, 30/10/2021 in GLYE and 11/10/2021 in GTGE. The meeting minutes was available in each of the estate.</p>																

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	<p>However, the minor non-conformance was escalated to major non-conformance due to recurrence of the same indicator during RAV.</p> <p>ii) Training on labelling of reused container with accordance to OSHA1994 USECHH Regulations 2000 Part VI sub-Regulation 21 to all the mill workshop workers on 26/10/2021 and 15/11/2021. Awareness were provided for workers not to store lubricants in unlabelled containers. Visit to the mill vicinity indicated that there was no storage of lubricants in any unlabelled containers. Therefore, this minor nonconformity is closed.</p>
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Non-conformity			
NCR Ref #	2036809-202103-N2	Clause & Category (Critical (Major) / Minor)	6.5.3 (Minor)
Date Issued	24/03/2021	Due Date	17/11/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	17/11/2021
Statement of Nonconformity:	No evidence of assessment of the needs of new mothers with consultation was sighted.		
Requirement Reference:	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.		
Objective Evidence:	There was one new mother just delivered on December 2020 in Genting Tanjung Oil Mill and one new mother delivered on September 2020 in Genting Landworthy Estate. However, no evidence of assessment of the needs of the new mothers with consultation was sighted. This has confirmed through interview with both new mothers.		
Corrections:	SD to conduct training/briefing to the estate and mill PIC regarding this requirement as well as to provide the documented assessment on the new mother needs. Estate and Mill plan to conduct the assessment of new mother's needs on April 2021.		
Root Cause Analysis:	This is new requirements as per RSPO P&C 2019 and estate/mill PIC is unaware of the requirements.		
Corrective Actions:	Sustainability Department will conduct proper training in future on any new certification standard requirements.		
Assessment Conclusion:	The corrective action is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.		
RAV Verification	Sustainability Executive has carried out briefing on consultation for new mother on 14/04/2021. All the Hospital Assistants from each of the estates and mill were attended. Seen the training attendance and evaluation form. There were 3 new mothers in GTOM. 1 of the new mothers is currently on unpaid leave waiting for delivery and the other 2 new mothers were resume back to work. The new mother assessment was conducted on 03/11/2021 and seen the evidence of consultation. There is no any specific needs requested by the new mothers. Interviewed with the new mothers confirmed that no specific needs that required by them. There was one new mother identified in GLYE with a baby of 1 year old. New mother assessment was conducted on 14/02/2020 and interviewed with the new mother confirmed no special needs required as new mother.		

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	The implementation of corrective action was found effective. Thus, the minor non-conformity was closed on 17/11/2021.
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Non-conformity			
NCR Ref #	2036809-202103-N3	Clause & Category (Critical (Major) / Minor)	7.2.8 (Minor)
Date Issued	24/03/2021	Due Date	17/11/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	17/11/2021
Statement of Nonconformity:	Handling and Traceability of Empty Chemical Containers was not justified in the estate.		
Requirement Reference:	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.		
Objective Evidence:	<p>Empty Chemical Containers are stored in the Scheduled Waste store temporarily before transferred to the premix area where it is triple rinsed, punctured and stored to be disposed as Recyclable Waste to the Licensed Waste Manager. Since 04/01/2020, the estate has issued a total of 198 units of empty chemical containers to date. The Empty Chemical Gallon Record shows only 77 units in the empty chemical containers inventory. The physical stock verified in the scheduled waste store and premix area was a total of 87 units. The balance empty chemical containers were not traceable.</p> <p>There were no records of storage or disposal of 4 liters chemical containers since the last disposal on 04/01/2020. The issuance records shown that there was a total of 78 containers used since the last disposal on 04/01/2020. There were no evidence that the chemical containers were handled responsibly.</p>		
Corrections:	<ol style="list-style-type: none"> 1) The balance empty chemical containers will be trace back, triple rinse if needed, punctured, recorded and kept in the empty chemical container store. 2) The 78 of 4 liters empty chemical containers will also be trace back, triple rinse, punctured, recorded and kept in the empty chemical store. 3) The storekeeper will update all empty chemical container record and tally with physical stock available in the store and will be verified by assistant manager incharge. Storekeeper also will be re-brief on the company procedure SOP-PD-01 by the assistant manager. 		
Root Cause Analysis:	There is lack of monitoring done by the estate management on the compliances of company procedure SOP-PD-01, Prosedur Stor dan Langkah – Langkah Pengendalian Bahan Kimia.		
Corrective Actions:	Monitoring on monthly basis will be done by Estate Assistant Manager In-charge of Estate Store through the Empty Chemical container Bin card or Log book. Sustainability Department will monitor this during follow up visit and in the next RSPO internal audit.		
Assessment Conclusion:	The corrective action is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.		
RAV Verification	Verification of the empty chemical containers bin cards/log book, records of disposal to authorised collector at the sampled estates showed that the number of containers was tally with physical containers on site. The implementation of the monitoring records was also inspected during the internal audit by the Sustainability Department. The CAP implementation was found to be effective and		

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	there was no recurrence of non-conformity. Thus, the minor non-conformity is closed on 17/11/2021.
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Opportunity for Improvement – NA	
OFI#	Description
OFI 1	<p>OFI Statement:</p> <p>Verification / Follow-up actions:</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1988112-202011-M1	Critical	2.3.1	18/11/2020	Closed out on 18/01/2021
2036809-202103-M1	Critical	7.10.3	24/03/2021	Closed out on 04/06/2021
2036809-202103-M2	Critical	3.6.2	24/03/2021	Closed out on 04/06/2021
2036809-202103-N1	Minor	3.3.2	24/03/2021	Escalated to Critical
2036809-202103-N2	Minor	6.5.3	24/03/2021	Closed out on 17/11/2021
2036809-202103-N3	Minor	7.2.8	24/03/2021	Closed out on 17/11/2021
2130489-202111-M1	Critical	2.1.1	17/11/2021	Closed out on 12/02/2022
2130489-202111-M2	Critical	3.3.2	17/11/2021	Closed out on 12/02/2022
2130489-202111-N1	Minor	2.1.3	17/11/2021	Open
2130489-202111-N2	Minor	3.4.2	17/11/2021	Open

3.4 Stakeholders and previous land owner / user consultation

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace 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.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
FFB Suppliers	Malbumi, Yu Kwang	Phone interview
Mill and estates workers	Workers	Face to face
Workers representatives	Workers representatives	Face to face
HUMANA school	Teachers	Face to face
Contractors	Greenmark, grocery store, Anugerah	Face to face

Stakeholders comment	
1	<p>Feedbacks: FFB Suppliers and neighbouring plantation – They are aware of the pricing mechanism and complaint procedure of the company. Payment was made in timely manner as per agreed term. There was no any issue with the company and the company has maintained the boundaries to prevent encroachment of land. There was no land dispute reported.</p> <p>Audit Team verification and response: No further issue.</p>
2	<p>Feedbacks: Workers – They informed that there was no discrimination issue reported in the mill and estates. All the management treated them equally regardless of gender and nationalities. They were paid as per Minimum Wage Order 2020 and Sabah Ordinance. They hold the key of the passport locker and they are allowed to access to the passport anytime. There was no forced labour in the company as the overtime are offered voluntarily basis.</p> <p>Audit Team verification and response: No further issue.</p>

3	Feedbacks: Workers' Representatives – They informed that they were elected freely by the workers. They have meeting with the management to discuss if there is any issue reported by the workers. During the time of audit, there was no pending issue reported. The management will take immediate action if there is any defects in the housing area.
	Audit Team verification and response: No further issue.
4	Feedbacks: HUMANA Teachers – They informed that they have good relationship with the management. The management will provide any assistance especially on the maintenance of school whenever they requested. The management also provided free transport to send the teachers to each of the division to carry out class in small group during MCO period. They also informed that the attendance of students was satisfied and no child labour found in the company.
	Audit Team verification and response: No further issue.
5	Feedbacks: Contractors - They informed that the payment was made in timely manner after they submitted the invoice. They are aware of the complaint procedure and have good relationship with the management.
	Audit Team verification and response: No further issue.

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
NA					
Note: Not applicable as all the estates under this certification unit have undergone the first replanting.					

Previous land owner / user comment – NA	
	Feedbacks:
	Audit Team verification and response:

3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Genting Tanjung Oil Mill Certification Unit has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Genting Tanjung Oil Mill Certification Unit is certified.

Report prepared by	Acceptance of Assessment Conclusion	
Name: Valence Shem	Name: Arunan Kandasamy	Name: James Chung Khim Hon
Company Name: BSI Services (Malaysia) Sdn Bhd	Company Name: Genting Plantations Berhad	Company Name: Genting Plantations Berhad
Title: Lead Auditor	Title: Senior Vice President – Plantation (Malaysia)	Title: Senior Vice President – Group Processing
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 07/03/2022	Date: 14/03/2022	Date: 14/03/2022

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 Berhad has developed Procedures on Requests and Responses with Doc. No.: SMP-GPB-25, Rev. 0 dated 14/08/2014 to define the responsibilities to respond constructively and promptly to the information requested by stakeholders. As per the procedure, the list of documents which are publicly available as below:</p> <ul style="list-style-type: none"> • Company annual report • Group policies • Reports related to environment such as EIA, EAI • RSPO external audit reports • Pollution prevention plan • Continuous improvement plan • Complaints and grievances book and its procedure • Negotiation and compensation procedure • Sexual harassment procedure <p>The mill and estates have issued the list of documents that could be requested by the stakeholders to all the relevant stakeholders of the mill.</p>	Complied

		<p>The stakeholders are required to register in Enquiry Register Book prior to access to the documents. The list of documents not limited to:</p> <ul style="list-style-type: none"> • Land title • Policies • Reports – EAI, SIA, HCV and audit reports • Management plans • Procedures 	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -</p>	<p>The memo issued were in Bahasa Malaysia and documents are in Bahasa Malaysia and English. Those documents can be access by the stakeholder upon register in the Enquiry Register Book.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p>The mill and estates have implemented Enquiry Register Book to record any requests from the stakeholder. There was no request on information from stakeholder. Most of the requests are related to housing repair from workers and visit from authorities. Sampled of the request as below:</p> <ol style="list-style-type: none"> 1. House No.: LQ4A in GTOM dated 30/08/2021 Request: The ceiling in the living room and bedroom was broken. Status: The management has purchased the required materials and recorded in the Direct Charge Record on 08/09/2021. Repair work was conducted, and the worker has acknowledged on 09/09/2021 after action taken. 	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. - Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has developed Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 23/02/2018 for the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties. The topics to be</p>	Complied

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		<p>discussed such as complaint & grievances, environmental and biodiversity concerns, social issue and suggestions for improvement. The procedure has been briefed to the external stakeholders during stakeholder meeting conducted on 09/11/2021 in GTOM.</p> <p>Manager of GTOM has been appointed by Senior Manager Operations to be the representative for ISCC, RSPO and MSPO related matters. Appointment letter dated 05/04/2021. Besides, the Mill Manager has appointed the Senior Production Executive as Sustainability Coordinator for ISCC, RSPO and MSPO related matters. Appointment letter dated 05/04/2021 was sighted.</p> <p>Estate Manager of Genting Layang Estate and Genting Tenegang Estate has appointed the Field Staff and Assistant Manager to be the person-in-charge for social and risk management requirements of RSPO, ISCC and MSPO Sustainability Standards. Role and responsibilities have outlined in the appointment letter dated 02/08/2021 and 01/11/2020 respectively.</p> <p>Stakeholder meeting for Y2021 was conducted on 09/11/2021 I GTOM where stakeholders such as FFB suppliers, internal stakeholders and representative of workers and gender committee were participated in the meeting. Seen the meeting minutes and issues raised by the stakeholders were recorded in the minutes. Issues raised were incorporated into social management plan dated 09/11/2021.</p> <p>There was a meeting conducted with contractors in GLYE on 28/10/2021. Meeting minutes was sighted with no issue reported by the contractors. Interviewed with one of the contractors confirmed that he has no issue with the management.</p>	
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		Internal stakeholder meeting was conducted on 08/11/2021 with the stakeholders such as teachers of CLC and HUMANA, contractors and Auxiliary Police. Meeting minutes was sighted with concerns raised by the management. Explanation and advices have been given to the stakeholders during the meeting as outlined in the meeting minutes. Besides, a survey form was sent to the stakeholders to collect feedbacks. There was no any comments received as verified from the feedback forms.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Genting Tanjung Oil Mill has developed stakeholder lists for different categories dated 03/11/2021. Stakeholders such as FFB suppliers, internal stakeholders, contractors, suppliers, government authorities and NGO were included in the list. Contact details with nominated representatives were identified. Stakeholder list dated 22/10/2021 for Genting Layang Estate and 25/10/2021 for Genting Tenagang Estate was sighted. The stakeholders such as contractors, suppliers, local communities, neighbouring plantations and government authorities were included into the list with list of contact and information of nominated representatives.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	The Ethical Conduct and Integrity Policy was developed and signed by President & COO dated 22/06/2015. The policy was communicated to the stakeholders including contractors and third-party during stakeholder meeting conducted on 09/11/2021. Besides, the contractors have signed the Addendum on RSPO, MSPO, ISCC & OSHA 1994 and seen the evidence of addendum signed by the contractors. Sampled the addendum as below: <ol style="list-style-type: none"> 1. Company No.: 1023122-P on 29/10/2021 2. Company No.: 201801002708 on 29/10/2021 	Complied

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		The workers in GTOM has signed on the Integrity Pledge to declare their commitment to comply with the Company Anti-Bribery and Corruption System Manual on 22/06/2021. The contractors in GLYE have been briefed on the policy on 28/10/2021 during the stakeholder meeting.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Anti-Bribery & Corruption Policy as well as Code of Business Conduct for Third Parties established were signed by both contractor & internal employees. It is also been checked in the internal audit by Sustainability Team.	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	Genting Tanjung Oil Mill and supply base continues to comply with legal requirements associated with the operating units. Compliance to each applicable law and regulation is monitored by the management of each operating units and the sustainability team. License and Permits were available for verification as sampled: <u>Genting Tanjung Oil Mill</u> <ol style="list-style-type: none"> 1. MPOB License; License Number: 620050004000; License Validity Period: 01/03/2021 – 28/02/2022. Processing Capability: 40,8000 mt a year. 2. DOE License; License Number: 005266; License Expiry Date: 30/06/2022. 3. Air Compressor License (Dearator Storage tank 2400 OD MM X 4878 SL MM); License Number: PMT-SB/21 45669; Registration Number: SB PMT 12186; License Expiry Date: 26/12/2022. 4. Air Compressor License (BI Drum Water Tube Boiler); License Number: PMD-SB/21 45668; Registration Number: SB PMD 2457; License Expiry Date: 26/12/2022. 	Non-compliance

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		<p>5. Energy Commission (Private Installation); Serial Number: 50438; License Number: 2021/01288; License Validity Period: 25/07/2021 – 24/07/2022.</p> <p>6. License to Employ Non-Residential Workers; License Number: JTK.H.KBN.600-4/1/10401/0379; License Validity Period: 14/05/2021 – 13/05/2022.</p> <p>7. S/N: JTKSBH/PMT/113/2021/0076 for deduction of wages for passport and medical fee for dependent which valid until 09/03/2023.</p> <p>8. S/N: 600-1/2/13/78 Jld, 2(08/KBN/2020-0232) for overtime limit not more than 120 hours/ month which valid until 22/07/2022.</p> <p>9. S/N: 600-1/2/13/9 Jld.6(05/KBN/2020-0231) for female to work from 10pm to 5am which valid until 23/07/2022. However, GTOM did not comply with the Clause 1.6 - to pay night shift allowance at the rate agreed between workers and employers stated in the employment contract. Sampled one of the female workers’ payslips and punch card for October 2021 (Employee No.: E00087) found that she worked at night shift without paying shift allowance. Thus, a non-conformity was raised.</p> <p><u>Genting Layang Estate</u></p> <p>1. MPOB License; License Number: 504759802000; License Validity Period: 01/07/2021 – 30/06/2022.</p> <p>2. Permit to Store Controlled Items (Barangan Kawalan); Description: Diesel (Limit: 18, 000 Litres); Serial Number: S003484; Reference Number: PPDNKK.SDK.09/2011 License Validity Period: 17/05/2021 – 16/05/2024.</p> <p>3. Energy Commission (Private Installation) License; License Serial Number: 50795; License Number: 2021/01490; License Validity Period: 05/07/2021 – 04/07/2022.</p>	
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		<p>4. License to Employ Non-Residential Workers; License Number: JTK.H.KBN.600-4/1/01261/0392; License Validity Period: 14/05/2021 – 13/05/2022.</p> <p>5. approval from <i>Jabatan Tenaga Kerja Sabah</i> to make deduction of wages of workers for the following purposes:</p> <ul style="list-style-type: none"> - Travel document processing cost (excluded levy, bank guarantee, agent fee and medical check-up) - Passport - Medical cost - Loan for purchase buffalo <p>Permit with S/N: JTKSBH/PMT/113/2021/0168 which valid until 02/05/2023 was sighted.</p> <p><u>Genting Tenegang Estate</u></p> <p>1. MPOB License (FFB); License Number: 504760102000; Estate Area: 3652.54 Ha; License Validity Period: 01/07/2021 – 30/06/2022.</p> <p>2. MPOB License (Nursery); License Number: 594637011000; License Validity Period: 01/03/2021 – 28/02/2022.</p> <p>3. Permit Barang Kawalan Berjadual; Serial Number: S003486; Reference Number: PPDNKK.SDK.23/2005(SK); Description: Diesel Euro 2M (Industry); Storage Quantity: 18, 000 Litres; License Validity Period: 09/05/2021 – 08/05/2024.</p> <p>4. Energy Commission License (Private Installation); Serial Number: 50731; License Number: 2021/01491; License Validity Period: 27/07/2021 – 26/07/2022.</p> <p>5. License to Employ Non-Residential Workers; License Number: JTK.H.KBN.600-4/1/01261/0394; License Validity Period: 14/05/2021 – 13/05/2022.</p>	
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		<p>6. approval from <i>Jabatan Tenaga Kerja Sabah</i> (S/N: 600-1/2/13/9(11/KBN/2019-0170) to make deduction of wages of workers for the following purposes:</p> <ul style="list-style-type: none"> - Travel document processing cost (excluded levy, bank guarantee, agent fee and medical check-up) - Passport for dependent - Medical cost - Loan for purchase buffalo <p>The permit was expired on 18/06/2021. Renewal of the permit was submitted on 17/11/2021 as verified the email correspondence to Genting HQ in Sandakan. However, the management continue to make deduction of wages for travelling documents and loan for purchase buffalo as verified in the payslips of October 2021 and monthly account analysis report. Thus, a non-conformity was raised.</p>	
<p>2.1.2</p>	<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>Documented system including Legal Requirements Register (Doc: SP-MGR-03-F01-0; Revision 08 dated 03/11/2021) is available. The content of the register as below:</p> <ol style="list-style-type: none"> 1. List of local legal requirements applicable to plantation and mill operations in Malaysia and East Malaysia. 2. List of international standards/requirements applicable to plantation operation in Malaysia: <ol style="list-style-type: none"> a. Part 1: Environment b. Part 2: Safety and Health c. Part 3: Social d. Part 4: Best Practices and other requirements e. Part 5: International Standards/Requirement 	<p>Complied</p>

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		Genting Tanjung Oil Mill and the visited estates have maintained a legal Requirement Register which consist of all updated and legal requirements that are applicable to their operations and available for verification.	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	<p>Genting Tanjung Oil Mill is separated through fencing around the vicinity. The effluent ponds are located at a distant from the processing area as larger space is required. The mill is located within Genting Tanjung Estate, belonging to the same parent company and of same certification unit.</p> <p>The estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers at the estate visited confirmed that they were clearly marked and maintained. Besides that, the estates have also erected fences, security trenches, drains and boundary roads as demarcation of the boundary with the neighbouring area.</p> <p><u>Genting Layang Estate.</u></p> <p>Visit to the boundary markers at Field 22 (1 marker) and Field 23 (2 markers), (Lat. 005° 24'31" N, Lon. 118° 13'44" N), boundary with Government Reserve (Road), witnessed that the estate has planted beyond the existing markers into the Government Reserve area along the 3 sampled points. Thus, a non-conformity report was raised.</p>	Non-compliance
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	Genting Tanjung Oil Mill and its supply base maintain lists of all contracted parties. The list was available in the stakeholder list provided for verification during the assessment.	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.	The Memorandum of Agreement (MOA) was available for verification for all contracted parties with the mill and estates. The MOA contains specific clause on meeting applicable legal requirements. Verified the sampled MOA as follows:	Complied

	<p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p><u>Genting Tanjung Oil Mill</u></p> <ol style="list-style-type: none"> 1. Contractor: Chong Shu Min Trading Sdn Bhd; Agreement Number: GTOM CPO-CSM2021; Agreement Date: 19.04.2021 2. Contractor: Landasan Kembar Sdn Bhd; Agreement Number: GTOM CPO-LK22021; Agreement Date: 19.04.2021 <p><u>Genting Layang Estate</u></p> <ol style="list-style-type: none"> 1. Contractor (Loading and Transporting of FFB and Loose Fruit): Anugerah Enterprise; Agreement Number: GLYE/FFB/21/01/01; Agreement Date: 01/01/2021 2. Contractor (Loading and Transporting of FFB and Loose Fruit): Sri Timbulus; Agreement Number: GLYE/FFB/21/01/02; Agreement Date: 01/01/2021 3. Contractor (Loading and Transporting of FFB and Loose Fruit): Man Fook Hing Transport Plt; Agreement Number: GLYE/FFB/21/01/03; Agreement Date: 01/01/2021 <p><u>Genting Tenegang Estate</u></p> <ol style="list-style-type: none"> 1. Contractor (Loading and Transporting of FFB and Loose Fruit): Wong Tet Ming Transport; Agreement Number: GTGE/FFB/21/01; Agreement Date: 01/01/2021 2. Contractor (Loading and Transporting of FFB and Loose Fruit): Kontractor SN Tan Transport; Agreement Number: GTGE/FFB/21/02; Agreement Date: 01/01/2021 3. Contractor (Loading and Transporting of FFB and Loose Fruit): Syarikat Perusahaan Kan; Agreement Number: GTGE/FFB/21/03; Agreement Date: 01/01/2021 	
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<p>2.2.3</p>	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>The Memorandum of Agreement (MOA) was available for verification for all contracted parties with the mill and estates. The MOA includes specific clause disallowing child, forced and trafficked labour. Verified the sampled MOA/Additional Addendum as follows:</p> <p><u>Genting Tanjung Oil Mill</u></p> <ol style="list-style-type: none"> 1. Contractor: Chong Shu Min Trading Sdn Bhd; CPO & PK Transport Agreement – Inclusion of RSPO, ISCC, MSPO & OSHA Requirements – Additional Addendum; Memorandum Date: 29.10.2021. 2. Contractor: Landasan Kembar Sdn Bhd; CPO & PK Transport Agreement – Inclusion of RSPO, ISCC, MSPO & OSHA Requirements – Additional Addendum; Memorandum Date: 29.10.2021. <p><u>Genting Layang Estate</u></p> <ol style="list-style-type: none"> 1. Contractor (Loading and Transporting of FFB and Loose Fruit): Anugerah Enterprise; Agreement Number: GLYE/FFB/21/01/01; Agreement Date: 01/01/2021 2. Contractor (Loading and Transporting of FFB and Loose Fruit): Sri Timbulus; Agreement Number: GLYE/FFB/21/01/02; Agreement Date: 01/01/2021 3. Contractor (Loading and Transporting of FFB and Loose Fruit): Man Fook Hing Transport Plt; Agreement Number: GLYE/FFB/21/01/03; Agreement Date: 01/01/2021. <p><u>Genting Tenegang Estate</u></p> <ol style="list-style-type: none"> 1. Contractor (Loading and Transporting of FFB and Loose Fruit): Wong Tet Ming Transport; Agreement Number: GTGE/FFB/21/01; Agreement Date: 01/01/2021 	<p>Complied</p>
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		<p>2. Contractor (Loading and Transporting of FFB and Loose Fruit): Kontraktor SN Tan Transport; Agreement Number: GTGE/FFB/21/02; Agreement Date: 01/01/2021</p> <p>3. Contractor (Loading and Transporting of FFB and Loose Fruit): Syarikat Perusahaan Kan; Agreement Number: GTGE/FFB/21/03; Agreement Date: 01/01/2021</p>	
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>A list of all directly sourced FFB is available for verification in the Genting Tanjung Oil Mill Approved Supplier List – FFB Supplier. It has the information about names of the suppliers, MPOB License number, geo-location and the status of the third party FFB suppliers land ownership.</p> <p>GTOM receives RSPO certified FFB from 5 of its own estates such as Genting Tanjung Estate, Genting Bahagia Estate, Genting Tenegang Estate, Genting Landworthy Estate and Genting laying Estate. The mill also receives non-certified FFB from 6 estates and 6 smallholders registered from outside the certification scope. The information related to the third party FFB suppliers were available and sampled as below:</p> <ol style="list-style-type: none"> 1. <u>Malbumi Estate</u> <ul style="list-style-type: none"> – MPOB License; License Number: 502782102000; Estate Area: 2956.99 Ha; License Validity Period: 01/12/2021 – 30/11/2021. – FFB Delivery Chit; Chit Number: 6534; Date: 14/11/2021; FFB Weight: 8, 950 kg. 2. <u>V.K Kalyanasundram Plantation Sdn Bhd.</u> <ul style="list-style-type: none"> – MPOB License; License Number: 516377002000; Estate Area: 361.4 Ha; License Validity Period: 01/12/2020 – 30/11/2021. – FFB Despatch Note; Despatch Note Number: VKKP 5184; Date: 13/11/2021; FFB Weight: 7, 540kg. – Country Lease: Title Number: 095329758; Date: 03/02/2012. 	Complied

		<p>3. <u>Chong Lip Chong</u></p> <ul style="list-style-type: none"> - MPOB License; License Number: 581887 - 001000; Estate Area: 16.4 Ha; License Validity Period: 13/07/2017 – 30/03/2022. - Delivery Note; D.O Number: 1557; Date: 12/11/2021; FFB Weight: 1, 320 kg. - Country Lease; Title Number: 095311452; Date: 21/08/1997 <p>4. <u>Winking Plantation Sdn Bhd</u></p> <ul style="list-style-type: none"> - MPOB License; License Number: 513616002000; Estate Area: 357.38 Ha; License Validity Period: 01/07/2021 – 30/06/2022. - Country Lease; Title Number: 095311489; Date: 01/01/1980 – 31/12/2078 - FFB Delivery Note; Chit Number: 16333; Date: 14/11/2021; FFB Weight: 6, 860 kg. 	
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>At the moment the mill does not receive any indirectly sourced FFB. All FFB are sent directly from estates or smallholders. Therefore, this indicator is not applicable during this assessment.</p>	Complied
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
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><u>Genting Tanjung Oil Mill</u></p> <p>Genting Tanjung Oil Mill have established a management plan with 5-year projection plan (2021 to 2025). The palm oil mill budget includes the projected FFB processed, CPO and PK production, OER and KER, production cost, training, insurance, environment conservation.</p> <p><u>Genting Layang & Tenegang Estates</u></p> <p>Estate have the management plan for FY21/22 with 5-year projection plan for (2021 to 2025) which includes on Replanting Area, Replanting</p>	Complied

		Expenditure, Plant machinery, Road & Bridges and Capital Expenditures amongst others.																			
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	The replanting programs for the estates are compiled as follows. The program is reviewable on an annual basis which is subject to amendment. All figures in hectares otherwise stated. <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Year</th> <th>Genting Layang Estate</th> <th>Genting Tenegang Estate</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>172.59</td> <td>571.34</td> </tr> <tr> <td>2023</td> <td>205.71</td> <td>378.58</td> </tr> <tr> <td>2024</td> <td>210.98</td> <td>360.01</td> </tr> <tr> <td>2025</td> <td>240.40</td> <td>391.38</td> </tr> <tr> <td>2026</td> <td>230.38</td> <td>-</td> </tr> </tbody> </table>	Year	Genting Layang Estate	Genting Tenegang Estate	2022	172.59	571.34	2023	205.71	378.58	2024	210.98	360.01	2025	240.40	391.38	2026	230.38	-	Complied
Year	Genting Layang Estate	Genting Tenegang Estate																			
2022	172.59	571.34																			
2023	205.71	378.58																			
2024	210.98	360.01																			
2025	240.40	391.38																			
2026	230.38	-																			
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	Management review was conducted for the mill and estate to address the internal audit findings among others. The management review meeting minutes was available for verification. The meeting was conducted simultaneously for the whole certification unit at the mill on 12.11.2021 chaired by the VP-Plantation.	Complied																		
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.																					
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -	The continuous improvement plan was developed in GTOM dated 05/04/2021, GLYE dated 27/09/2021 and GTGE dated 28/10/2021. The improvement for social as below: <ol style="list-style-type: none"> 1. To improve interior and exterior of workers quarters. – The management has in progress to repair the quarters based on Enquiry Register Book. Besides, the management has allocated in CAPEX for RM 100,00.00 to upgrade 4 blocks of quarters. Seen the CAPEX record. 	Complied																		

		<p>2. Important record of workers such as photo, work agreement, training card are kept inside the personal file. – The management has monitored the personal file and update the personal details in system. Sampled the personal file and found all relevant records were available.</p> <p>3. SIA stakeholder meeting minutes and complains book guide will be the official guide for any execution. – Issues raised were recorded into social management plan and action taken accordingly.</p>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. 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. - Minor Compliance -</p>	<p>The estate has completely filled its RSPO metrics template version 2.1 and submitted to the CB prior to this assessment. Based on verification of area statement, land titles, and Lintramax system the data was found to be accurate.</p>	Complied
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -</p>	<p>Genting Tanjung Oil Mill and the estates are guided by a number of SOPs that have been established for standardization as well as to ensure implementations and operations are in accordance with the legal requirements and best practises. The following manuals were available for verification. <u>Genting Tanjung Oil Mill</u></p>	Complied

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		<ol style="list-style-type: none"> 1. Genting SDC Sdn Bhd; Genting Tanjung Oil Mill; Safe Operating Procedure; Environmental Control Procedure; Issue Date: 10/08/2016. 2. Genting Plantations Berhad; RSPO SCCS Requirement, Documentation Guidelines and Compliance Status; Prepared By: Sustainability Department; Last Amended: 20/04/2018. <p><u>Supply Base Estates</u></p> <ol style="list-style-type: none"> 1. Standard Operating Procedures (SOP); Genting Sabah Estates; Revision 3; Dated: 11/10/2013 has been established. Among the subcategorises available were: <ul style="list-style-type: none"> • Chemical, Lubricant and Fertilizer Handling and Management • Trunk Injection – Bagworm • Rat Bait Application • Manuring • Harvesting • Vehicle and Heavy Machineries • Workshop • Water Treatment • General 2. Manual Keselamatan & Kesihatan Pekerjaan (OSH Manual/OM); Effective: 01/01/2016. 3. Keselamatan Dan Kesihatan Pekerjaan; Prosedur Kerja Selamat; Kawalan Dan Pencegahan Wabak Covid-19; Document Number: GENP/SOP/18/03; Date: 19/03/2020; Revision Date: 20/10/2021. 	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	Internal audits were conducted by Genting Sustainability Department to confirm consistent implementation of SOPs. During mill and estates visit it was noted that that operating parameters were consistently recorded	Complied

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	<p>- Minor Compliance -</p>	<p>by the operators. Internal Audit records were available for verification as below:</p> <p><u>Genting Tanjung Oil Mill (GTOM)</u></p> <ol style="list-style-type: none"> 1. Internal Audit (RSPO P&C) was conducted on 28-29/10/2021 by the Sustainability Manager. During the internal audit, 9 Nonconformities were raised on the RSPO P&C Standard. All nonconformities have been addressed accordingly. 2. Internal Audit (RSPO SCCS) was conducted on 28-29/10/2021 by the Sustainability Manager. During the internal audit, 1 Major Nonconformity was raised on the RSPO SCCS standard. All nonconformities have been addressed accordingly. <p><u>Genting Layang Estate</u></p> <ol style="list-style-type: none"> 1. RSPO Internal Audit and Safety Audit was conducted to check consistent implementation of RSPO related procedures in the estate. The Internal Audit was conducted on 26/10/2021 by the Sustainability Executive and Safety Officer. <p><u>Genting Tenegang Estate</u></p> <ol style="list-style-type: none"> 1 RSPO Internal Audit and Safety Audit was conducted to check consistent implementation of RSPO related procedures in the estate. The Internal Audit was conducted on 27/10/2021 by the Sustainability Executive and Safety Officer. <p>However, at GTOM, site visit to the sundry shop, Tasmia Lapadeng found that one of the workers was 15 years old. This has verified with the birth certificate provided by the sundry shop's owner. However, the tenant has employed young person which is not comply with the tenancy agreement signed dated 01/01/2021, under Schedule 3, Clause vii, the tenant shall</p>	
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		<p>comply to no employment of minors (below 18 years old). Thus, a non-conformity was raised.</p> <p>At GTGE, the last review of the social management plan in GTGE was conducted on 20/09/2018 and the latest was on 08/11/2021. This is not accordance to the Social Management Procedure (Doc. No.: SMP-GPB-32, Rev. 1 dated April 2021), under Clause 6.1.6 where the plan shall be reviewed and updated at least once in 2 years. Thus, a non-conformity was raised</p> <p>This is recurrence of minor non-conformance of the same indicator and thus, this minor non-conformance escalated to major non-conformance.</p>	
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available. - Minor Compliance -</p>	<p>The monitoring of the SOP implementation was implemented through all levels of the supervisory personnel with records maintained and verified. Among others the records are:</p> <ul style="list-style-type: none"> - Daily production/work records for the core activities at the estates and mill - Field Costing Books - Monthly Chemical Consumption Record - Mature/immature field work program - Fertilizer application Records - Herbicide Work Program - Rat Baiting Census Records - Harvesting Standard Checklist - Worksite Inspection Form 	<p>Complied</p>
<p>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.</p>			

<p>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -</p>	<p>For replanting activity, environmental aspect and impact assessment was done through a Proposal for Mitigation Measure (PMM) at GLYE and through Environmental Impact Assessment (EIA) at GTGE. The PMM for GLYE was conducted by a licensed consultant in October 2016 for replanting of 382.20 Ha [report no.: CK/EV406-4030/16]. The monitoring of Environmental Monitoring & Compliance Audit for replanting can be further improved to ensure it is delivered on timely manner (OFI). The EIA for GTGE was also conducted in 2014 by the same consultant for proposed replanting [report no.: CK/EV403-4252/14].</p> <p>Internally, the certification unit has also carried out the identification of environmental aspect and impact through utilisation of a format. The evaluation was last reviewed in January 2021. Among the activities covered were field maintenance, harvesting & evacuation, handling of agrochemicals, fuel, oil & lubricants, transportation, maintenance of machinery & vehicles and wastes management to name a few.</p> <p>Social Impact Assessment (SIA) & Human Rights Impact Assessment (HRIM) Report was reviewed on May 2021 for Genting Tanjung Oil Mill and all the supplying estates (Genting Tanjung Estate, Genting Landworthy Estate, Genting Layang Estate, Genting Bahagia Estate and Genting Tenegang Estate) by Sustainability Department. The assessment has involved relevant stakeholders such as FFB suppliers, local authorities and workers. No negative impact was identified during the assessment through interviewed.</p>	<p>OFI</p>
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. - Minor Compliance -</p>	<p>At GLYE, based on the PMM’s agreement (“Surat Akujanji”) between Genting Tanjung Sdn Bhd and Environmental Protection Department [ref.: JPAS/PP/02/600-1/11/1/255(23), dated 09/03/2017], the estate has to conduct the Environmental Monitoring & Compliance Audit twice a year [Clause 6.2 (ii)]. The last audit was conducted on 14/09/2020 [report no.: CK/MO411/1035-2/20] by a licensed consultant. According the report, the</p>	<p>Non-compliance</p>

		<p>estate has complied with all the criteria in compliance schedule stipulated in the agreement. Among the criteria evaluated were:</p> <ul style="list-style-type: none"> - Control of development site - Road construction - Construction of workers quarters, workshop and nursery - Rehabilitation of exposed soil - In-phase development - Protection of river and control of water source quality - Control of air quality and fire - Oil and toxic wastes - Solid and biomass wastes - Sewerage control - Cease or completion of project <p>Social Management and Monitoring Plan of Genting Tanjung Oil Mill was reviewed and last updated on 09/11/2021, 16/11/2021 in Genting Layang Estate and 08/11/2021 in Genting Tenegang Estate. Issues raised during the stakeholder meeting, gender committee meeting and workers' committee meeting were incorporated into the management plan. Sampled of impact as below:</p> <ol style="list-style-type: none"> i. Issue: Gender committee representative requested to conduct the fire drill in the housing area in GTOM on 30/10/2021. Action: The management will conduct the fire drill training on 07/11/2021. Status: The management has conducted the fire drill on 07/11/2021 and seen the record of training such as attendance list and photo evident. <p>There was a change of payment method of wages from cheque to Merchant Trade Card since July 2021 in both estates. However, the impact</p>	
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		<p>of the changes was not identified and not included in the social management plan.</p> <p>Thus, a minor non-conformance was raised.</p> <p>Apart from that, the SEIA and the list of stakeholders of GLYE can be further improved by including the villagers from Kampung Bilit and Kampung Sukau as they are confirmed by the management to be doing fishing activities at Tenegang Besar River and occasionally left their empty lubricants drums at the riverbank within the estate (OFI).</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>Social Management and Monitoring Plan was reviewed on yearly basis. The evidence of implementation of the environmental management plan can be seen in various records detailed in Indicators 7.3.1, 7.8.1, 7.9.1, and 7.10.3.</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>- Minor Compliance -</p>	<p>Genting Plantations Berhad has developed Foreign Workers Recruitment Procedure (Doc. No.: GEN-13, Rev. 02 dated 09/11/2020) to establish control procedures on the employment of foreign workers. Recruitment, selection and termination/ retirements process was clearly outlined in the procedure.</p> <p>Local Recruitment Procedure was established as well in the company. Besides, criteria for promotion was outlined in Procedures for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021).</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>The last recruitment in GTOM was on July 2021. The worker submitted application to apply for job even there is no vacancy in the mill. Mill Manager has conducted interviewed with the worker via Zoom meeting. Photocopy of identification card and resume was kept in the personal file. The Manager informed that the method of recruitment in the mill is through word of mouth.</p>	Complied

		<p>Seen the record of last recruitment in GTGE on 01/10/2021. Medical examination report, employment contract and copy of passport were retained in the personal file. The recruitment process is normally through word of mouth or from the dependent of the workers who more than 18 years old.</p>	
<p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -</p>	<p>All operations were risk assessed to identify all Health and Safety issues. Mitigation plans, and procedures were available, documented and implemented as below.</p> <p><u>Genting Tanjung Oil Mill</u></p> <ol style="list-style-type: none"> 1. HIRARC was available in the document SP-MGR-01-F01-0; Revision: 05, to cover all risk that had been identified in the mill. Among the HIRARC sighted was Covid 19, Office and Weighbridge, Belt press, ESP Plant, FFB Grading and Crane. The latest revision of HIRARC was on 01.06.2021 2. CHRA Report was available, conducted by Rehpro Scientific Sdn Bhd (Dosh Reg No: HQ/11/ASS/00/290) on 30/11/2020. The CHRA report (CHRA Report Number: RSSB/CHRA/2020-049 was available during assessment. The recommendation provided by the CHRA assessor has been addressed accordingly. 3. Noise Risk Assessment was conducted on 16/03/2021 by Sherman Services & Supply at the mill. The NRA Report (Report Reference Number: SSS/NOISE-283/21) was available for verification. The recommendation provided by the NRA assessor was addressed accordingly. 4. Audiometric test was conducted for 56 mill workers on 01.10.2021 by DAB OH Sdn Bhd. The results concluded that 46 workers have normal 	<p>Complied</p>

		<p>hearing, 10 workers had abnormal audiogram and no workers had standard threshold shifts. The 10 workers with abnormal hearing were advised to be referred to an OHD as per the audiometric report. 5 of them have been referred to the OHD on 13/11/2021 and the balance 5 have been proposed to be referred on 19/11/2021.</p> <p>5. Medical Surveillance was conducted for 5 workers exposed to welding fumes and chemicals. The workers were sent for medical surveillance on Sept 2019 by DAB OH Sdn Bhd. The results indicated there were no toxicity present in the samples. And all workers were fit for work.</p> <p><u>Genting Layang Estate</u></p> <ol style="list-style-type: none"> 1. HIRARC Register was available in the estate to assess and analyse and control all hazards and risk related to the operations in the estate. The HIRARC register was available for verification. 2. Chemical Health Risk Assessment, CHRA Report was available, conducted by QMSPRO Sdn Bhd (Dosh Reg No: HQ/03/ASS/00/154) on October 2019. The CHRA report (CHRA Report Number: JKKP HQ/03/ASS/00/154-2019/056 was available during assessment. The recommendation provided by the CHRA assessor has been addressed accordingly. 3. Noise Risk Assessment was conducted on 08/04/2021 by Assessor Dr. Mohd Azizan Bin Abdul Aziz (Dosh Reg Number: HQ/18/PEB/00/00024). The NRA Report (Report Reference Number: CC/0421/050) was available for verification. The audiometric test for the recommended workers has been planned to be conducted in January 2022. <p><u>Genting Tenegang Estate</u></p>	
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		<ol style="list-style-type: none"> 1. HIRARC Register was available in the estate to assess, analyse and control all hazards and risk related to the operations in the estate. The HIRARC register, revised on 09/11/2021 was available for verification. 2. Chemical Health Risk Assessment, CHRA Report was available, conducted by QMSPRO Sdn Bhd (Dosh Reg No: HQ/03/ASS/00/236) on October 2019. The CHRA report (CHRA Report Number: JKKP HQ/07/ASS/00/236-2019/154 was available during assessment. The recommendation provided by the CHRA assessor has been addressed accordingly. 3. Noise Risk Assessment was conducted on 09/04/2021 by Assessor Dr. Mohd Azizan Bin Abdul Aziz (Dosh Reg Number: HQ/18/PEB/00/00024). The NRA Report (Report Reference Number: CC/0421/057) was available for verification. The audiometric test for the recommended workers has been planned to be conducted in January 2022. 	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	The effectiveness of the Health and Safety in the certification unit is monitored and ensured through checklist and trainings that were conducted by Genting Tanjung Oil Mill and its estate in each of the operations. Site visits around the mill and estate indicated the control measures as per HIRARC were followed and ensured by the respective management units.	Complied
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
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>	A training programme has been developed and available in the Health and Safety Training Program (KKP) 2021 and Sustainability Training Matrix & Program 2021. The trainings were sighted to have included Gender Specific Training and involves staffs and workers. Covid-19 training and briefings documents were also available for the mill and estates.	Complied
3.7.2	Records of training are maintained.	Records of trainings were maintained by the Mill and all estates as below:	Complied

	<p>- Minor Compliance -</p>	<p>Genting Tanjung Oil Mill</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>All Policy training</td> <td>13/01/2021</td> </tr> <tr> <td>Mill Security Training</td> <td>15/06/2021</td> </tr> <tr> <td>Communication & Grievance Training</td> <td>15/04/2021</td> </tr> <tr> <td>Welding Technique & Use of Oxygen and Acetylene Training</td> <td>04/11/2021</td> </tr> <tr> <td>Scheduled Waste Training</td> <td>25/09/2021</td> </tr> <tr> <td>Vehicle Handling & Precaution Training</td> <td>23/08/2021</td> </tr> <tr> <td>Zero Burning Policy Training</td> <td>07/11/2021</td> </tr> <tr> <td>Chemical Handling Training</td> <td>02/11/2021</td> </tr> </tbody> </table> <p>Genting Layang Estate</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Genset HIRARC, PPE and SOP Training</td> <td>01/11/2021</td> </tr> <tr> <td>Chemical Spillage Training</td> <td>02/11/2021</td> </tr> <tr> <td>Air Compressor HIRARC, PPE and SOP Training</td> <td>25/10/2021</td> </tr> <tr> <td>Harvesting HIRARC, PPE and SOP Training</td> <td>15/10/2021</td> </tr> <tr> <td>Worker Contract Details Training</td> <td>06/10/2021</td> </tr> <tr> <td>Fertilizer Store Management Training</td> <td>02/10/2021</td> </tr> </tbody> </table>	Training	Date	All Policy training	13/01/2021	Mill Security Training	15/06/2021	Communication & Grievance Training	15/04/2021	Welding Technique & Use of Oxygen and Acetylene Training	04/11/2021	Scheduled Waste Training	25/09/2021	Vehicle Handling & Precaution Training	23/08/2021	Zero Burning Policy Training	07/11/2021	Chemical Handling Training	02/11/2021	Training	Date	Genset HIRARC, PPE and SOP Training	01/11/2021	Chemical Spillage Training	02/11/2021	Air Compressor HIRARC, PPE and SOP Training	25/10/2021	Harvesting HIRARC, PPE and SOP Training	15/10/2021	Worker Contract Details Training	06/10/2021	Fertilizer Store Management Training	02/10/2021	
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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Personnel relevant to the supply chain implementation as defined by the OU are the personnel that are involve directly in supply chain system such as Assistant Managers, QA, clerk, lab supervisor & assistant, weighbridge operators. The latest RSPO SCCS training was carried out on 25/10/2021.</p>	Complied																						
Criterion 3.8: Supply chain requirement for mills																									
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</p>	NA	Not Applicable																						

	<p>against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>		
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>The Palm Oil Mill receives and processes both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.</p>	Complied
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>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in Table 10 of this public summary report.</p>	Complied
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>	<p>Company has registered their mill in the PalmTrace:-</p> <ul style="list-style-type: none"> - License ID: CB121966 - Members Name: Genting Oil Mills (Sabah) Sdn Bhd – Genting Tanjung Oil Mill - Members ID: RSPO_PO1000005521 - Type Of Business: Oil Mill 	Complied

		– Licence valid until 10-01-2022	
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill. 	<p>Genting Plantations Berhad; Sustainability Management Procedure Manual; Supply Chain and Traceability (Palm Oil Mill) Procedure Manual, Doc. No. SMP-GPB- 23, Rev.12; Dated November 2020 has been established to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. Besides, procedures that are relevant were developed as below:</p> <ul style="list-style-type: none"> a. Incoming Inspection (Direct Material), Doc. No. PM-PRD-04 dated 02/01/2018 b. Product Identification & Traceability, Doc. No. PM-PRD-01 dated 02/01/2018 c. Handling, Storage, Preservation and Delivery, Doc. No. PM-LAB-03 dated 02/01/2018 d. Genting Plantations Berhad; RSPO SCCS Requirement, Documentation Guidelines and Compliance Status; Prepared By: Sustainability Department; Last Amended: 20/04/2018. 	Complied
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. 	<p>Genting Plantations Berhad; Sustainability Management Procedure Manual; Sustainability Internal Audit Procedure; Doc. No. SMP-GPB-03; Revision: 06; Issue Date: August 2021 was established and implemented in the Oil Mill.</p> <p>The RSPO SCCS Internal Audit is conducted and guided by this procedure. The frequency of the internal audit is not less than once a year as per the procedure. The requirements of RSPO SCCS have been addressed in the procedure.</p>	Complied

	<p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Internal Audit (RSPO SCCS) was conducted on 28-29/10/2021 by the Sustainability Manager. During the internal audit, 1 Major Nonconformity was raised on the RSPO SCCS standard. All nonconformities have been addressed accordingly.</p>	
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>The accompanying documents of incoming FFB from own estate are estate's weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate's ticket number is recorded in the mill's ticket number.</p> <p>There has been no projected overproduction. Nonetheless, based on interview with the staff, the facility is aware of this requirement.</p> <p>The mechanism for handling non-conforming oil palm products and/or documents is addressed under Control of Non-conforming Product [PM-PRD-05, rev. 0, dated 2/1/2018] which describes the non-certified material or product shall be kept segregated from the certified ones.</p>	Complied
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <p>a) The name and address of the buyer;</p> <p>b) The name and address of the seller;</p>	<p>All the information required by the standard was available in various shipping documents such as transporter's delivery order, mill's weighbridge, buyer's receiving notes, to name a few. The following contracts were verified:</p> <p>i) SOM/1021/T01PK, commodity: PK (RSPO-MB)</p> <p>ii) SOM/1021/T06CPO, commodity: CPO (RSPO-MB)</p>	Complied

	<ul style="list-style-type: none"> 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>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 the mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 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. 	<p>There is no milling activity outsourced by the mill. Transportation of CPO and PK is outsourced to two contractors. Verification of the contract agreements showed that the requirements of RSPO SCCS were also included in the contract. At the point of this assessment, the agreements were still valid.</p>	<p>Complied</p>

	d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The name and contact details of the transporters were recorded in the mill's list of stakeholders and updated whenever necessary.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	There was no new transportation contractor engaged. The same contractors since the last assessment visit were maintained.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>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>	The facility opted for three monthly basis record and balance. Excel format is used for the mass balance calculation. Among the information available in the format is month, FFB processed, OER, CPO amount [opening, produced, and closing], dispatch of CPO & PK and balance of CPO & PK both in virtual and physical. Verification of the MB sheet showed that the mill was able to demonstrate the products were delivered from positive stocks. Should there be any short sale, it will be balanced within three months.	Complied

	<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>	NA. Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER can be seen in Table 10 of this report.	Not Applicable
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER and estimation can be seen in Table 10 of this report.	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	NA. The facility opted for mass balance model.	Not Applicable
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to 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>	The actor is a palm oil mill and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. Based on the downloaded transactions register from the certification unit's PalmTrace, the company was able to demonstrate that it has been registering its transactions in the PalmTrace accordingly. Based on samples, all the announcements were made within three months after dispatch.	Complied

	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.		
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>	RSPO trademark was not used. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Genting Tanjung POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of 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 as no off-product claim made by Genting Tanjung POM as to date.	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 as no off-product claim made by Genting Tanjung POM as to date.	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 as no off-product claim made by Genting Tanjung POM as to date.	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.	No evidence of RSPO corporate logo used by Genting Tanjung POM and verified through document and site review (notice board, business card, shipping documentation, etc.	Complied
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.	Business to business communication was demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
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.	As per the interview with weighbridge operator, it was mentioned that the weighbridge ticket will state the info i.e: product/commodity with SCC model (Crude Palm Oil RSPO MB) and will be stamped the RSPO certificate number. Verified the documents found that the supply chain model and certificate number were stated on the ticket.	Complied
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	Genting Tanjung POM is not categorized under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable

	<p>wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
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.	Genting Tanjung POM did not use business to consumer communication. Therefore, this requirement was 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.	Genting Tanjung POM did not use business to consumer communication. Therefore, this requirement was 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.	Genting Tanjung POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Genting Tanjung POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Genting Tanjung POM did not use business to consumer communication. Therefore, this requirement was 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.	Genting Tanjung POM did not use business to consumer communication. Therefore, this requirement was 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.	Genting Tanjung POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable

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6.8	<p>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 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>Genting Tanjung POM did not use business to consumer communication. Therefore, this requirement was not applicable.</p>	<p>Not Applicable</p>
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>NA</p>	<p>Not Applicable</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>NA</p>	<p>Not Applicable</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition,</p>	<p>NA</p>	<p>Not Applicable</p>

	the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.		
Labelling and trademark (IP)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	NA	Not Applicable
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org 	NA	Not Applicable

	<ul style="list-style-type: none"> • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 		
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Based on the excel sheet mass balance accounting of the mill, production of certified products was calculated correctly according to fractions of FFB received from both certified and non-certified suppliers. Therefore, 100% of certified oil palm content in the products can be achieved.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Based on the excel sheet mass balance accounting of the mill, production of certified products was calculated correctly according to fractions of FFB received from both certified and non-certified suppliers. Therefore, 100% of certified oil palm content in the products can be achieved.	Complied
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains 	Site only apply MB model and the conventional CPO are downgraded from MB whenever demanded.	Complied

	<p>the certified material; some or all of it may reside in a product that does not carry a claim.</p> <ul style="list-style-type: none"> • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p>	<p>Site only apply MB model and the conventional CPO are downgraded from MB whenever demanded.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 		
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	Genting Plantations Berhad has established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company respect human rights and support international human rights law. They protect retaliation against human rights defenders who submit complaints in good faith. Briefing of the policy was conducted on 05/11/2021 in the mill, 08/10/2021 in GLYE and 24/02/2021 in GTGE. Training record was available.	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	Genting Plantations Berhad ensure all personnel are treated fairly and protected from any form of discrimination that would constitute a violation of their human rights. Interviewed with the workers confirmed that no harassment by the management and their rights were respected.	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<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-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	Genting Plantations has established Social Policy dated 14/09/2020 where they prohibit retaliation against human rights defenders who submit complaints in good faith in line with their existing Whistle-blower policy which provide a grievances channel for human rights defenders to report their concerns freely and without fear of reprisal or intimidation.	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	Genting Plantations Berhad has established Complaints and Grievances procedure with Doc. No.: SMP-GPB-19, Rev. 04 dated March 2020 to provide guidelines on handling complaints & grievances involved internal and external stakeholders. All the written confidential complaints shall be	Complied

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		dealt by Manager. The timeframe for the action to be taken depends on seriousness of the complaints or grievance. The accepted timeframe to acknowledge and respond to the complaint or grievances is within 1 month upon receipt. Besides, Careline was implemented and seen the memo of the implementation published on the entrance of the mill office, estate office, sundry shops and food shops. The procedure was briefed to the workers on 03/11/2021 in GTOM, 13/03/2021 in Genting Tenegang Estate and 26/03/2021 in Genting Layang Estate. Interviewed with the workers confirmed that they are aware of the complaint procedure.	
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 -	GTOM and the estates have implemented Complaints/ Grievances Record Book to record any complaint or grievance received. There was no complaint received since last audit in GTOM. Sampled of the records of complaint as below: <ul style="list-style-type: none"> i. Ref No.: 062 dated 11/08/2021 in GLYE Issue: Water pipe in the sink broken and the toilet bowl was unstable. Status: Purchase requisition form dated 12/08/2021 was sighted where the management of GLYE has purchased the required materials. The complainant has acknowledged after the action has been taken on 12/08//2021. Interviewed with the complainant confirmed that the issue has resolved. ii. Ref. No.: 065 dated 25/01/2021 in GTGE Issue: Septic tank need to be replaced, toilet door was broken, and roof gutter need to be repaired. Status: The management has assigned workers to carry out all the issues reported on 27/01/2021 and seen the records of repair work done. The complainant has acknowledged on 28/01/2021 after issues were resolved. 	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants	Refer to the procedure above, under Clause 2.1.10, the complainant shall be given the option of access to independent legal and technical advice, to	Complied

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	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 -	choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	
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 -	GTOM has made contribution to the local communities and workers such as donation to the local authority upon request by the authority dated 15/09/2021. Besides, the mill has gave mask to all the workers and seen the record of distribution. Free Covid-19 RTK Antigen testing was carried out to the workers. Interviewed with the workers in both GTOM an GLYE confirmed that the management has provided free transport to send the children to school and send the workers to town upon request. In GLYE, the management has corporate with the local NGO, Borneo Rhino Alliance Berhad (BORA) to restore the habitat and enrichment of food plants for orangutan. Seen the meeting report where the MOU will be effective from 01/08/2021 to 31/07/2023. In GTGE, interviewed with the HUMANA teachers confirmed that the management has made contribution to the school such as repair and maintenance of the classrooms. Besides, free transportation was provided to the students to send them to school. During movement control order, the van was used to send the teachers to each of the division to organize class with the students.	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	(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. - Critical (Major) compliance -	Genting Tanjung Oil Mill is located in the land of Genting Tanjung Estate under the Title No. Country Lease 095316993. Verified the sampled land titles of estate shown that the legal ownership of the company. Sample of land title as below: <u>Genting Layang Estate:</u> 1. Country Lease No.: 095318817 for 1,683 hectares 2. Country Lease No.: 095317463 for 4,047 hectares (394.41 hectares under GLYE)	Complied

		<p><u>Genting Tenegang Estate:</u> Country Lease No.: 095317463 for 4,047 hectares (394.41 hectares transferred to GLYE)</p>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory	The legal boundary for estate visited was clearly demarcated with legal boundary stone. Seen the photo evident of the legal boundary stone demarcate the boundary. Boundary stone map last updated 01/11/2017 in	Complied

	mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	GLYE and 29/10/2018 in GTGE was available during the audit. Boundary stone maintenance and management programme dated 05/08/2021 was sighted to monitor the boundary stone location against the survey map.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.5	(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. - Critical (Major) compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	No new plantings are established on the land of local peoples. This has verified through stakeholders' consultation.	Not Applicable
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	No new plantings are established on the land of local peoples. This has verified through stakeholders' consultation.	Not Applicable

	- Critical (Major) compliance -		
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -	No new plantings are established on the land of local peoples. This has verified through stakeholders' consultation.	Not Applicable
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	No new plantings are established on the land of local peoples. This has verified through stakeholders' consultation.	Not Applicable
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	No new plantings are established on the land of local peoples. This has verified through stakeholders' consultation.	Not Applicable
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	No new plantings are established on the land of local peoples. This has verified through stakeholders' consultation.	Not Applicable

4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new plantings are established on the land of local peoples. This has verified through stakeholders' consultation.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new plantings are established on the land of local peoples. This has verified through stakeholders' consultation.	Not Applicable
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Genting Plantations Berhad has developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates (Doc. No.: SMP-GPB-18, Rev. 03 dated 29/12/2017). The objective of the procedure is to provide guidelines on the handling of land issues/ boundary conflicts, including related land conflicts. Negotiation and legal proceedings may be carried out interchangeably or simultaneously. Compensations procedures were outlined in the procedure.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	Procedure as refer to indicator 4.6.1.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land.	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.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land.</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.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates (Doc. No.: SMP-GPB-18, Rev. 03 dated 29/12/2017). The objective of the procedure is to provide guidelines on the handling of land issues/ boundary conflicts, including related land conflicts. Negotiation and legal proceedings may be carried out interchangeably or simultaneously. Compensations procedures were outlined in the procedure.</p>	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Procedure as refer to indicator 4.7.1.</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>There was no community that have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area.</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	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.2	(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. - Critical (Major) compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.3	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) - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.4	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). - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the neighbouring plantations. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			

5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous period prices paid for FFB were displayed at the mill's weighbridge office. The prices were based on MPOB current pricing and the calculation method was available in the agreement between the company and the smallholders. It is also publicly available upon request.	Complied
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 -	Mechanism of pricing is spelt out in Genting's " <i>Polisi Perolehan Tandan Buah Sawit (TBS)</i> " (External FFB Procurement Policy Agreement). Explained by the Marketing Palm Product Manager to the FFB suppliers through a meeting. After the meeting, the policy agreement is signed by both parties (Genting & FFB supplier) individually.	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Based on interview, the FFB suppliers are satisfied with and understand the calculation formula documented in the agreement.	Complied
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	The FFB suppliers are consist of out-growers (plantation companies). They are not independent or scheme smallholders. Thus, decision-making processes are managed by their own corporate level.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Contracts between the third party FFB suppliers and Genting were signed by both parties. Based on interview with the sampled suppliers, there was no issue raised related to fair contract.	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Based on sampled transactions, the payments were made in timely manner in-line with the agreement i.e. "not later than 12 th of every subsequent month".	Complied

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5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	GTOM has calibrated its weighbridges by hiring an independent third party endorsed by Metrology Department as required under Weights and Measures Act 1981, Regulations 16, 28A dan 45. The equipment was last calibrated as the following details: #B1698839, weighbridge #185050318, dated 08/02/2021 #B1698938, weighbridge #204850077, dated 08/07/2021 #B1698939, weighbridge #123650371, dated 08/07/2021	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	There is no independent smallholder engaged by the mill. Genting Oil Mill only received FFB from own supply bases and small plantations company (out-grower). Thus, this indicator is not applicable.	Not Applicable
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	The grievance mechanism for third party FFB suppliers is guided by Genting’s grievance procedure which details described in Criterion 4.2. So far there was no grievance raised from the FFB suppliers.	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Not applicable as there is no smallholder supplying to GTOM besides out-grower (plantation company).	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO	Not applicable as there is no smallholder supplying to GTOM besides out-grower (plantation company).	Not Applicable

	certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -		
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Not applicable as there is no smallholder supplying to GTOM besides out-grower (plantation company).	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Not applicable as there is no smallholder supplying to GTOM besides out-grower (plantation company).	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Not applicable as there is no smallholder supplying to GTOM besides out-grower (plantation company).	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 -	Genting Plantations Berhad has established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company shall not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.	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 -	Interviewed with the workers from different gender and nationalities confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers and job offered based on capability. The worker can request for job transfer if they found they are unfit for the job assigned to them.	Complied

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6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>As per the Procedure for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021), the recruitment and promotion were based on merit and skills. No discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. Reviewed the personal files of the workers found that they have been provided with on job trainings. The records of training were filled in the Individual Training Record form.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Refer to the Procedure for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021), Clause 6.8.5, no pregnancy testing will be carried out as a condition of hiring or for continued employment. Interviewed with female workers and the HR from HQ confirmed that pregnancy testing is not a criterion for pre-employment.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Gender Committee was established in the mill and estates as the platform for female workers to raise awareness and identify issue faced by the women. The frequency of the meeting is at least 6 months once as per the Social Management Procedure (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021).</p> <p>GTOM, GLYE and GTGE has developed Sustainability Annual Programme Year 2021 to plan out the meetings for whole year such as Gender Committee and Workers' Committee meeting. However, due to Covid-19 pandemic and MCO, the meeting scheduled on the 1st half of the year was unable to carry out as approved by the Managers. plan. The 2nd half of the meeting was carried out on 30/10/2021 in GTOM, 22/10/2021 in GLYE and 11/10/2021 in GTGE. The meeting minutes was available in each of the estate.</p> <p>Function of the committee and the rights of women were briefed during the meeting. There was no case of sexual harassment and violence reported.</p>	Complied

		Interviewed with the female workers and Chairman confirmed that no case of sexual harassment and violence reported. There was one case on the harassment by one of the workers against the female worker in GLYE. She has reported to the management and action has been taken accordingly. Interviewed with the complainant confirmed that action has been taken and no repeat issue has reported. The female workers aware of the complaint procedure if there is any case happen.	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	All the workers employed in the mill and estate consists of local Malaysian and foreign workers. Reviewed total 38 payslips in GTOM, GLYE and GTGE which consists of male and female workers found that their salary is the same for the same job scope. They were paid according to the Minimum Wage Order 2020 without any discrimination. Interviewed with the male and females workers confirmed that they were paying based on Minimum Wage Order 2020 regardless of gender and nationality.	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 -	Sample of employment contracts are reviewed and the agreements are signed in Bahasa Malaysia as the workers are from Indonesia. Upon the foreign workers arriving to the estate, they will be inducted for the terms and conditions of employment contract and briefed on the company's policies. Interviewed with the workers confirmed that they understood the terms and conditions that they have signed prior to work.	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 requirements) and payroll documents give accurate information on compensation for all work	Reviewed total 38 employment contracts in GTOM, GJYE and GTGE and the contracts are signed in Bahasa Malaysia. The terms and conditions such as working hours, deduction, overtime, sick leave, holiday entitlement, reason of dismissal and period of notice were outlined in the contract. The extension contract has followed the terms and condition as per the original signed contract and will be signed by the workers before the submission of permit renewal.	Complied

	performed. This includes a form of record for work done by family members. - Critical (Major) compliance -		
6.2.3	(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. - Critical (Major) compliance -	38 samples for workers in various operations including mill operators, harvester, field workers and general workers were verified. Overtime was appropriate and deduction was made fairly as per the agreement and approval from the <i>Jabatan Tenaga Kerja Sabah</i> . Deduction was made as per the approval from Jabatan Tenaga Kerja Sabah.	Complied
6.2.4	(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. - Critical (Major) compliance -	Estate Hospital Assistant has carried out linesite inspection on weekly basis in GTOM using <i>Borang Pemeriksaan Kawasan Perumahan</i> . The last inspection was carried out on 13/11/2021. Any issue found during linesite inspection will be recorded under comment column of the checklist and action taken accordingly. Linesite inspection was conducted on weekly basis by using <i>Rekod Pemeriksaan Mingguan Perumahan</i> by HA. Issues were recorded in the checklist if there is any issue sighted. VMO will reviewed the inspection checklist when VMO visited to the estate.	Complied
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	There were sundry shops located inside the housing area. Workers have access to purchase the foods and goods easily. Interviewed with the workers confirmed that the price is reasonable. Pricing monitoring was carried out by the management and price was displayed at the goods and foods in the sundry shops.	Complied
6.2.6	A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE	Genting Plantations Berhad has established the prevailing wage calculation last updated on 30/10/2021 to include all the in-kind benefits provided to the workers in Genting Tanjung Oil Mill and supply bases. Sampled the prevailing wages for benefit of housing is RM 244.01 and transport allowance is RM 90.25. The prevailing wages is more than the Minimum Wage Order 2020.	Complied

<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>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 		
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	<ul style="list-style-type: none"> 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 the core works are performed by permanent and full-time employees in Genting Tanjung Oil Mill and supply bases. No temporary/casual worker was employed. The estates have appointed contractor for FFB transporting and the workers of contractors are working permanently in the estates.</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>Genting Plantations Berhad has established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited. Reproductive rights are protected. Briefing of the policy was conducted on 05/11/2021 in the mill, 08/10/2021 in GLYE and 24/02/2021 in GTGE. Training record was available.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>As per the Social Management Procedure (SMP-GPB-32, Rev. 01 dated April 2021), workers committee meetings shall be conducted at least 6 months once or whenever necessary.</p> <p>GTOM, GLYE and GTGE has developed Sustainability Annual Programme Year 2021 to plan out the meetings for whole year such as Gender Committee and Workers' Committee meeting. However, due to Covid-19 pandemic and MCO, the meeting scheduled on the 1st half of the year was unable to carry out as approved by the Managers. plan. The 2nd half of the</p>	Complied

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		<p>meeting was carried out on 31/10/2021 in GTOM, 30/10/2021 in GLYE and 11/10/2021 in GTGE. The meeting minutes was available in each of the estate.</p> <p>Issues raised were recorded in the minutes and incorporated into social management plan. Previous issues raised were rectified and resolved. Interviewed with the workers’ representatives confirmed that the management has taken action to resolve the issues raised by them. As of the time of audit, no other issue reported by the workers.</p>	
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>The workers committee in GLYE were elected by the workers in the morning muster on 10/10/2021. Seen the record of election recorded in Muster Briefing Record. Interviewed with the workers’ representatives confirmed that they were elected by workers during morning muster.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>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.</p> <p>- Minor compliance -</p>	<p>Genting Plantations Berhad has established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where the company shall not use any child labour. Children’s right is respected. The contractors have signed on the Addendum on RSPO, MSPO, ISCC & OSHA 1994 where there is specific clause under Clause 4 where the contractors shall ensure no minors (below 18 years old) are employed.</p>	Complied
6.4.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>As per Procedures for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021), Clause 6.8.4, the estate and mill shall verify identification card, passport and work permit before employ workers to ensure no child labour in the company. The contractor shall also provide full details of the workers such as identification card, passport, work permit for age verification by the management. Reviewed the list of workers and passports found that no child labour was employed in the company.</p>	Complied

6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -</p>	<p>There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Employee Master Listing and through interviewed with the stakeholders confirmed that no child labour was employed in the certification unit.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -</p>	<p>The Social Policy has been briefed to all the stakeholders during stakeholder meeting. Besides, the contractor will sign on the Addendum on RSPO, MSPO, ISCC & OSHA 1994 where there is specific clause under Clause 4 where the contractors shall ensure no minors (below 18 years old) are employed.</p>	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited. Besides, Sexual Harassment Policy dated 03/08/2009 was developed to ensure harassment-free environment and avoid behaviour that may create an atmosphere of hostility and intimidation of any kind at the workplace. Reproductive rights are protected. Briefing of the policy was conducted on 05/11/2021 in the mill, 08/10/2021 in GLYE and 24/02/2021 in GTGE. Training record was available. Procedure on Prevention and Eradication of Sexual Harassment at the Workplace was established with Doc. No.: SMP-GPB-20, Rev. 0 dated 11/10/2013. Process of handling sexual harassment complaint was outlined in the procedure.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>Reproductive rights are protected as mentioned in the Social Policy. Briefing of the policy was conducted on 05/11/2021 in the mill, 08/10/2021 in GLYE and 24/02/2021 in GTGE. Training record was available.</p>	Complied

6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>There were 3 new mothers in GTOM. 1 of the new mothers is currently on unpaid leave waiting for delivery and the other 2 new mothers were resume back to work. The new mother assessment was conducted on 03/11/2021 and seen the evidence of consultation. There is no any specific needs requested by the new mothers. Interviewed with the new mothers confirmed that no specific needs that required by them.</p> <p>There was one new mother identified in GLYE with a baby of 1 year old. New mother assessment was conducted on 14/02/2020 and interviewed with the new mother confirmed no special needs required as new mother.</p>	Complied
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>Genting Plantations Berhad has established Complaints and Grievances Procedure (Doc. No.: SMP-GPB-19, Rev. 04 dated March 2020) to provide guidelines on handling the complaint & grievances. Written complaints can be delivered to management anonymously by post, email, SMS or via complaint and suggestion box. Any private and confidential complaints can be extended to VP-HRAD at Head Office in Kuala Lumpur. The procedure was briefed to the workers on 03/11/2021. Interviewed with the female workers confirmed that they are understood the complaint procedure.</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 	<p>The workers have been allocated with passport locker to keep their passport and the key was hold by themselves. Site visit to the passport lockers and found each of the locker was displayed with name of workers. There was no new recruitment of foreign workers from Indonesia since last audit due to border closure. Employment contract was signed by the workers as sampled and the worker is allowed to terminate the contract with the serve of notice period. Interviewed with the workers confirmed that overtime was voluntarily basis. They were paid with the overtime rate as per Sabah Ordinance. No contract substitution occurred.</p>	Complied

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	<ul style="list-style-type: none"> • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>For contractors, they have signed on Addendum on RSPO, MSPO, ISCC & OSHA 1994, under Clause 4 where the contractor shall not practice any kind of discrimination or forced labour.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The company has implemented Social Policy dated 14/09/2020 and People Policy dated 03/08/2009. Besides, Procedures for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021) was developed and implemented where the migrant workers are provided with safe living condition, post-arrival orientation on the employment condition, safety & health, sustainability and law & regulations. No discrimination, no recruitment fee and no contract substitution was implemented in the company.</p>	Complied
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The responsible persons for Health and Safety in the mill and estates have been identified as follows.</p> <ol style="list-style-type: none"> 1. <u>Genting Tanjung Oil Mill</u> The Mill Manager, Mr. Chin Jai Syn has been appointed the chairman for the OSH Committee at Genting Tanjung Oil Mill as stated in the appointment letter dated 05.04.2021 undersigned by the Senior Manager Operations. The Chairman is accountable to oversee all OSH related issues within his vicinity. 2. <u>Genting Layang Estate</u> The Estate Manager has been appointed the chairman for the OSH Committee at Genting Layang Estate as stated in the appointment letter dated 12.10.2020 undersigned by the Vice President – Plantation (Sabah, Region 2). The Chairman is accountable to oversee all OSH related issues within his vicinity. 	Complied

		<p>3. <u>Genting Tenegang Estate</u></p> <p>The Estate Assistant Manager, Mr. Amirul Bakri Bin Abu Bakar has been appointed as the Safety & Health Representative at Genting Tenegang Estate as stated in the appointment letter dated 20.09.2021 undersigned by the Estate Manager. The OSH Rep is accountable to oversee all OSH related issues within his vicinity.</p> <p>OSH Meetings were conducted every 3 months to address OSH related issues. The meetings discussed accident statistics, PPE usage and monitoring, review of HIRARC, main estate operations, functions and contributions of Safety & Health Committee, OSH Training Program, workplace inspection report and emergency response plan among others.</p> <ul style="list-style-type: none"> - Genting Tanjung Oil Mill latest meeting was conducted on 17.09.2021. - Genting Layang Estate have conducted the JKPP meetings on 30/03/2021, 26/06/2021 and 27/09/2021. - Genting Tenegang Estate have conducted the JKPP meeting on 10/11/2021. 	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p><u>Genting Tanjung Oil Mill</u></p> <p>1. Emergency Response Procedures was available in the document Genting Oil Mills (Sabah) Sdn. Bhd; Emergency Response Procedures; Doc Number: SP-MGR-04; Doc Date: 01.08.2017. The ERP includes plans and procedures for emergency incidences such as fire outbreak, oil/chemical spillage, effluent overflow and accident. An emergency response team have been created in the mill to combat the incidences mentioned above. Regular trainings and drills are conducted for the team to handle emergencies. Emergency Preparedness, Fire Drill (Mill</p>	Complied

		<p>& Housing) and Fire Extinguisher Training was conducted on 23/06/2021</p> <ol style="list-style-type: none"> 2. First aid kit inventory was available for verification. It was acknowledged that all required items were stated in the inventory and does not contain consumable medicines. The first aid holder's summary list was also available to include all important operations and worksites. First Aid Training was conducted in 23/06/2021. 3. SOP for Handling and Reporting Accidents were available in the document System Procedure: NADOPOD; Doc Number: SP-MGR-06; Doc Date: 01.08.2017. There were 1 accident cases reported for the year 2020. The JKK 6 Form was available for verification dated 21/11/2020. The JKKP 8 Form for 2010 was submitted on 11.01.2021 for the year ending 2020. There was 1 accident reported for the year 2021 as of to date. Records of accident with JKKP 6 submission to DOSH was available for verification. <p><u>Genting Layang & Tenegang Estate</u></p> <ol style="list-style-type: none"> 1. Emergency Response Plan in the estates is guided by the document Genting Plantations OSH Manual; Document Number: OM-GPB-04; Effective: 01/01/2010. The estates have established Emergency Response Plans for fire, flood, chemical spillages, accidents etc. There was formation of Emergency Response Team were available, headed by the incident commanders which is the estate managers. Trainings on ERP were conducted in the estates as below: <p><u>Genting Layang Estate</u></p> <ul style="list-style-type: none"> • Fire Extinguisher and Emergency Response Plan Training was conducted on 20/09/2021. • Fire Extinguisher Training was conducted 05/11/2021. <p><u>Genting Tenegang Estate</u></p> 	
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		<ul style="list-style-type: none"> • ERP Team Training on 14/10/2021. <p>2. Visit to the fields and stores indicated that the PIC in charge of the operations gangs and stores were equipped with First Aid Boxes. The HA of each estates have provided trainings to all First Aid Box Holders. The boxes are regularly monitored and replenished. Sighted the training records available for each estate as below:</p> <ul style="list-style-type: none"> • GLYE: First Aid Training was conducted on 29/10/2021 • GTGE: First Aid Box training was conducted on 24/06/2021 and 29/09/2021. <p>3. <u>Genting Layang Estate</u> There were 1 accident case reported for the year 2021 involving harvesting work. A total of 3 LTA days was recorded for the incident and reports were recorded and available for verification. For the year 2020 there were no accidents recorded. The JKPP 8 Form have been submitted to DOSH and 06/11/2021 and available for verification.</p> <p><u>Genting Tenegang Estate</u> There were no accidents reported for the year 2020 in the estate. The JKPP 8 Form have been submitted to DOSH on 17/01/2021 and available for verification. As for 2021 there was 1 accident reported as of to date involving harvesting work dated 30/01/2021. The accident investigation report was available for verification.</p>	
6.7.3	(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	All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to	Complied

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	<p>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>the stores of the respective estates and mill, it was sighted that all required and appropriate PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers rooms were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause them.</p>																																			
<p>6.7.4</p>	<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 is provided to all the employees. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for August – October 2021 for all operating units visited as below.</p> <table border="1" data-bbox="1064 751 1854 1281"> <thead> <tr> <th>Operating Units</th> <th>Month</th> <th>No of Employees</th> <th>Contribution</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Genting Tanjung Oil Mill</td> <td>08/2021</td> <td>103</td> <td>2895.10</td> </tr> <tr> <td>09/2021</td> <td>103</td> <td>2670.00</td> </tr> <tr> <td>10/2021</td> <td>109</td> <td>2864.10</td> </tr> <tr> <td rowspan="3">Genting Layang Estate</td> <td>08/2021</td> <td>94</td> <td>2192.90</td> </tr> <tr> <td>09/2021</td> <td>107</td> <td>2514.60</td> </tr> <tr> <td>10/2021</td> <td>108</td> <td>2558.00</td> </tr> <tr> <td rowspan="3">Genting Tenegang Estate</td> <td>08/2021</td> <td>213</td> <td>4319.00</td> </tr> <tr> <td>09/2021</td> <td>230</td> <td>5075.00</td> </tr> <tr> <td>10/2021</td> <td>236</td> <td>5494.70</td> </tr> </tbody> </table>	Operating Units	Month	No of Employees	Contribution	Genting Tanjung Oil Mill	08/2021	103	2895.10	09/2021	103	2670.00	10/2021	109	2864.10	Genting Layang Estate	08/2021	94	2192.90	09/2021	107	2514.60	10/2021	108	2558.00	Genting Tenegang Estate	08/2021	213	4319.00	09/2021	230	5075.00	10/2021	236	5494.70	<p>Complied</p>
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<p>6.7.5</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p>	<p>The Operating units recorded all injuries and accidents in the LTA format as below:</p>	<p>Complied</p>																																		

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- Minor compliance -	Operating Units	2020	2021 (as of 15/11/2021)	
	Genting Tanjung Oil Mill	1 Case (7 Days)	1 Case (6 Days)	
	Genting Layang Estate	Nil	1 Case (3 Days)	
	Genting Tenegang Estate	Nil	1 Case (3 Days)	

Principle 7: Protect, conserve and enhance ecosystems and the environment

Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>The estates continue to implement biological control to eradicate oil palm pest in the plantation such as leaf eating pest and rats among others. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Barn owls <i>Tyto Alba</i> has been introduced for biological control of rats. Barn owl boxes are constructed at the rate of 1 box to 20ha. Census records show that there was minimal outbreak of leaf eating pest. Although there have been minimal outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators and further reduce the outbreak. Records show that the estates have planted beneficial plants such as <i>Cassia cobanensis</i> and <i>Turnera subulate</i> and <i>Antigonon leptopus</i>.</p> <p>Yearly specific plans were available for the year 2021 by the estates. Sighted the IPM Plan for each estate as below:</p>	Complied
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		<p><u>Genting Layang Estate</u></p> <ol style="list-style-type: none"> 1. Beneficial Plant – Increase planting area from 300 Ha to 1000 Ha. 2. Ganoderma Census – Carry out Ganoderma census to manage infected area mainly before replanting progress 3. Rat Baiting – Conducted to control rat attack. Replacement round to be continued until acceptance level drop below 20%. 4. Barn Owl Project – Continuous monitoring to be done to monitor box occupancy. <p><u>Genting Tenegang Estate</u></p> <ol style="list-style-type: none"> 1. Barn Owl <ul style="list-style-type: none"> • To implement Barn Owl – Planned Ratio 1:20 • Increase Barn Owl Population: Implement 1st generation bait – Butik S at Barn Owl Area and Stop completely using 2nd generation bait – storm etc. 2. Beneficial Plant – Maintenance and upkeep of current beneficial plants. 3. Integrated Weed Management – Grass Cutting and Rotorslasher. 	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>Species referenced in the Global Invasive Species Database and CABI.org are not used in the estates.</p>	Complied

7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no evidence of use of fire for pest control in all the estates.</p>	<p>Complied</p>
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>All pesticides used were those officially registered under the Pesticide Act 1974. All estates use only class II, class III & class IV pesticides as verified via the chemical register and the chemicals available in the chemical store of the respective estates.</p> <p>a. No illegal agrochemicals (stated by local and international laws) such as paraquat was used in their estates.</p> <p>b. The usage of the agrochemicals was based on the Sustainability Management Procedure; Doc No: SMP-GPB-28; Titled: Justification Of Pesticides Used; Revised on: 17/03/2015. SOP and in the Pictorial Safety Standard Book where written justifications had been provided for various fields operations.</p> <p>The Manual has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs.</p>	<p>Complied</p>
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained by the state and submitted to the Head Quarters monthly.</p> <p>Genting Layang Estate have established a Pesticide Usage Monitoring Record from Year 2017 to 2021 (As at September 2021). The record shows</p>	<p>Complied</p>

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		<p>the type of pesticide used, the a.i percentage, total Ha applied, total pesticide a.i/mt and a.i/ha. The summary was available for the report which showed the following:</p> <ol style="list-style-type: none"> 1. Total Pesticide (kg a.i/mt FFB): 0.077 2. Total Pesticide (kg a.i/planted Ha): 1.353. <p>Genting Tenegang Estate have established a Pesticide Usage Monitoring Record from Year 2016 to 2021 (As at October 2021). The record shows the type of pesticide used, the a.i percentage, total Ha applied, total pesticide a.i/mt and a.i/ha. The summary was available for the report which showed the following:</p> <table border="1" data-bbox="1070 719 1895 911"> <thead> <tr> <th>Summary</th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021</th> </tr> </thead> <tbody> <tr> <td>Total Pesticide (kg a.i/mt FFB)</td> <td>0.106</td> <td>0.069</td> <td>0.069</td> <td>0.146</td> </tr> <tr> <td>Total Pesticide (kg a.i/planted Ha)</td> <td>1.802</td> <td>1.135</td> <td>1.098</td> <td>1.351</td> </tr> </tbody> </table>	Summary	2018	2019	2020	2021	Total Pesticide (kg a.i/mt FFB)	0.106	0.069	0.069	0.146	Total Pesticide (kg a.i/planted Ha)	1.802	1.135	1.098	1.351	
Summary	2018	2019	2020	2021														
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Total Pesticide (kg a.i/planted Ha)	1.802	1.135	1.098	1.351														
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -</p>	<p>The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.</p>	Complied															
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -</p>	<p>There is no evidence of prophylactic use of pesticides in all estates visited.</p>	Complied															

7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <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>	<p>Both estates do not use chemical that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions or Paraquat in their daily operations. This was established during the verification of the chemical register of both estates and interview with the management representative.</p> <p>This can also be evident in the estates Continual Improvement Plans which the estates have committed to:</p> <ol style="list-style-type: none"> 1. Use of alternative pesticides that are safe and less toxic. Change from Paraquat to other alternative chemicals i.e. Glyphosate, Glufosinate and, Monosodium. 2. Briefing to staffs and executives on minimizing pesticides and continue monitoring, avoid wastage and leakage, etc. 3. Planting cover crops at immature fields. Strive to establish covers before planting. 4. Increase Beneficial Plant areas. 5. Implement Cattle Grazing at suitable areas for reducing pesticides use which in changing spraying technique from circle and path spraying to circle spraying only. 6. Commence manual uprooting/slashing for selective weed control. 	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>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p> <table border="1" data-bbox="1066 1289 1861 1367"> <thead> <tr> <th data-bbox="1066 1289 1227 1367">Operating Unit</th> <th data-bbox="1227 1289 1675 1367">Training</th> <th data-bbox="1675 1289 1861 1367">Date</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Operating Unit	Training	Date				Complied
Operating Unit	Training	Date							

		GLYE	PPE, Triple Rinse and Chemical Mixing Training	09/11/2021		
			Triple Rinse, Premixing and Chemical Handling Training	29/10/2021		
		GTGE	Chemical Store Training	20/09/2021		
			Sprayers Training	20/09/2021		
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all 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 padlock 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 Hazard 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.</p> <p>- Minor compliance -</p>	<p>Pesticide containers were found to be recycled and used as premix containers. The access containers were all triple rinsed and punctured and stored at the designated store before they are disposed to the licensed recycle waste collector.</p> <p>Sighted the latest consignment note for disposal of triple rinsed and punctured chemical drums as below: -</p> <p><u>Genting Layang Estate</u></p> <p>Disposed to G-Planter on 06/07/2021; 20 Liters Container: 193 Units, 4 Liters Containers: 125 Units, 500g Containers: 65 Units; 10kg Containers:</p>				Complied

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		<p>177 Units; Garlon Mix 4 Liters Containers: 55 Units and Miracle – 500ml Containers: 4 Units.</p> <p><u>Genting Tenegang Estate</u></p> <p>Disposed to Lagenda Bumimas Sdn Bhd as Scheduled Waste; SW409 – Empty Chemical Containers; Consignment Note Number: C 001139; Quantity: 462.4 kg; Date: 22/09/2021.</p>	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>The management representative has concluded that there is no aerial spraying conducted in the estates.</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Specific Annual Medical Surveillance was conducted for all workers exposed to chemicals including sprayers, mandores,</p> <p><u>Genting Layang Estate</u></p> <p>There were no use of chemicals classifies as organophosphate (Schedule II Chemicals) in the estate therefore, as recommended in the CHRA, the annual medical surveillance was not necessary. Nevertheless, the Estate Hospital Assistant has conducted monthly Health Monitoring for all chemical handlers in the estate and records were available for verification. The most recent health Monitoring was conducted on 20/10/2021.</p> <p><u>Genting Tenegang Estate</u></p> <p>Medical Surveillance was conducted on 20th March 2021 at Klinik Elopura Sdn Bhd for 3 workers identified to be exposed to hazardous chemicals in the estate. The results indicated that all 3 workers were fit to work.</p>	Complied

7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad; Sustainability Management Procedure Manual – Legal Requirement Register; Doc Number: SMP-GPB-22 (Page 46 of 54); 12. Pesticides (Highly Toxic Pesticides) Regulation 1966, section 3 (a); 1. <i>Larangan – Tiada seorang pun majikan yang terlibat dengan penggunaan atau pengendalian racun makhluk perosak amat berbisa boleh – (c) menyebabkan dan membenarkan seorang pekerja wanita yang mengandung atau sedang menyusukan untuk menggunakan atau mengendalikan racun makhluk perosak amat berbisa.</i></p> <p>It was sighted during the visit to the stores there were signages stating that pregnant and breast-feeding women are not allowed to enter the chemical stores.</p>	Complied
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Documented waste management plan was available at the mill and estates. Among the types of waste identified were scheduled wastes, domestic wastes and recyclable wastes. The scheduled wastes were disposed in accordance to EQA regulations, domestic wastes were landfilled in accordance to procedure and recyclable wastes are planned to be delivered to recycle wastes vendors.</p> <p>With regards to scheduled wastes disposal, the visited operating units have satisfactorily maintained the regulated documents such as notification, inventory records and consignment notes through e-swiss. Among the scheduled wastes generated by the operating units were spent lubricants, spent batteries, contaminated filters & rags, contaminated PPE and clinical wastes to name a few.</p> <p>Sampled consignment notes verified: GTOM #20210928180Q3ZBS, dated 28/09/2021, SW305</p>	OFI

		<p>#20210928185F27L0, dated 28/09/2021, SW409 #2021092818UANSEP, dated 28/09/2021, SW102 #2021092818DRXTJN, dated 28/09/2021, SW410</p> <p>GLYE #C001129, dated 22/09/2021, SW410 (used PPE) #C001128, dated 22/09/2021, SW410 (used filter) #C001131, dated 22/09/2021, SW102</p> <p>GTGE #C001136, dated 22/09/2021, SW305 #C001137, dated 22/09/2021, SW408 #C001138, dated 22/09/2021, SW410 #C001139, dated 22/09/2021, SW409</p> <p>Domestic wastes are disposed through landfills. Based on site visit at the estates' landfills [GLYE - 5°24'12"N 118°13'29"E; GTGE - 5°21'26"N 118°13'38"E], the management of the landfills was found to be in accordance to the procedure. Generally, only organic or biodegradable wastes are disposed, and selection of locations were done in such a way that minimising the environmental impact. Nonetheless, the monitoring of trips of tractors collecting domestic wastes at the labour quarters can be further improved to ensure they are disposed at the designated landfill (OFI).</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Ref.: Sustainability Management Procedure Manual, SMP-GPB-12, rev. 1, dated 1/12/2014. Based on interview and site verification, it was noted</p>	Complied

		that the proper disposal of wastes was understood by the workers and management.	
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. Domestic and household wastes were landfilled and based on site visit it was observed that the majority of the wastes were of organic wastes.	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 -	The estates are guided by the following Manuals and SOPs to ensure Good Agricultural practices throughout the operation: 1. Genting Plantations Oil Palm Manual (OPM) issued on 09.11.1999 2. Sustainability Management Procedure Manual 01.08.2013 revised in 07.02.2019. 3. Environmental Control Procedure – 01.09.2018 4. Standard Operating Procedure (West Malaysia Estates) 01.01.2011. The soil fertility and yield enhancement are described in detail in the Oil Palm Manual under the following sections: 1. Oil Palm Manual - No 7; Manuring of Oil Palm 2. Oil Palm Manual - No 13; Managing Difficult Soils	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 periodic sampling defined by the certification unit under its agriculture manual for tissue is 1 year whereas for soil analysis is 5 years. <u>Genting Layang Estate</u> Plant Test Report (Tissue Sampling) was done for Genting Layang Estate by Genting Plantations Research Centre on 03/04/2019 (Test Report Number: PR50/2019. The report was issued to the estate on 10/05/2019 and was available for verification. The soil analysis test report was done for the estate by Genting Plantations Research Centre on 05/10/2021. The results will be provided upon test completion.	Complied

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		<p><u>Genting Tenegang Estate</u> Plant Test Report (Tissue Sampling) was done for Genting Tenegang Estate by Genting Plantations Research Centre on 19/03/2021 (Test Report Number: PR50/2019. The report was issued to the estate on 10/05/2019 and was available for verification. The soil analysis test report was done for the estate by Genting Plantations Research Centre on 13/06/2020. The Test Results Report (Report Number: STR 07A/2020) was received on 01/03/2021 and available for verification.</p>																											
<p>7.4.3</p>	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -</p>	<p>EFB was received from the Genting Tanjung Oil Mill and supplied to all the estates for mulching purpose at the replanting areas. Records of application were maintained by the respective estates and were applied in accordance with the SOP at 20 – 40 mt/ha. Sampled the records of application as below:</p> <p><u>Genting Layang Estate</u></p> <table border="1" data-bbox="1064 855 1870 1054"> <thead> <tr> <th>Block</th> <th>Applied Ha</th> <th>Total Mt</th> <th>Mt/Ha</th> </tr> </thead> <tbody> <tr> <td>17</td> <td>1.97</td> <td>98.83</td> <td>5.70</td> </tr> <tr> <td>14A</td> <td>12.98</td> <td>129.81</td> <td>3.64</td> </tr> <tr> <td>15A</td> <td>37.30</td> <td>373.00</td> <td>10.97</td> </tr> </tbody> </table> <p><u>Genting Tenegang Estate</u></p> <table border="1" data-bbox="1064 1145 1886 1246"> <thead> <tr> <th>Year</th> <th>2017</th> <th>2018</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td>EFB (mt)</td> <td>7,230.06</td> <td>359.23</td> <td>454.54</td> <td>1596.09</td> </tr> </tbody> </table>	Block	Applied Ha	Total Mt	Mt/Ha	17	1.97	98.83	5.70	14A	12.98	129.81	3.64	15A	37.30	373.00	10.97	Year	2017	2018	2019	2020	EFB (mt)	7,230.06	359.23	454.54	1596.09	<p>Complied</p>
Block	Applied Ha	Total Mt	Mt/Ha																										
17	1.97	98.83	5.70																										
14A	12.98	129.81	3.64																										
15A	37.30	373.00	10.97																										
Year	2017	2018	2019	2020																									
EFB (mt)	7,230.06	359.23	454.54	1596.09																									
<p>7.4.4</p>	<p>Records of fertiliser inputs are maintained. - Minor compliance -</p>	<p>Records of fertilisers input is maintained in Genting Plantations Research Centre - 2021 Fertiliser Program for Genting Layang Estate and Genting Tenegang Estate, which have the information about type of fertiliser, quantity (bags and kg), dates of application and field number. Verification</p>	<p>Complied</p>																										

		of records confirmed that the applied fertilisers were tally with the agronomist recommendation. The application of the fertilizers is recorded in the program upon completion of each field.	
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 -	Soil and topography maps were made available for verification by the sampled estates. The maps were prepared by Genting Plantations Research Centre. Based on the maps, all the soil type of the sampled estates is of mineral type.	Complied
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	Based on site visit at the replanting areas, there were no observation of planting on steep slopes. Generally, slope areas that are more than 25 degree are left unplanted and natural vegetation is maintained.	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting at all the sampled estates.	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	There was no new planting at the sampled estates. Thus, this indicator is not applicable. Nonetheless, the estates continuously implement practices good agricultural practices as guided in their SOPs (Oil Palm Manual, dated 30/08/2013). They are followed to manage the soil fertility to levels ensuring optimal and sustainable yields. Based on the soil maps, there were no marginal or fragile soils identified. The major soil series at GLYE is Kinabatangan whereas at GTGE is Buran.	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.	NA as no new planting at the sampled estates.	Not Applicable

	- Minor compliance -		
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	NA as no new planting at the sampled estates.	Not Applicable
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	NA as no peat within the certification unit.	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 -	NA as no peat within the certification unit.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	NA as no peat within the certification unit.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	NA as no peat within the certification unit.	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 cycles, whichever is greater, before	NA as no peat within the certification unit.	Not Applicable

	<p>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. 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>	NA as no peat within the certification unit.	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>	NA as no peat within the certification unit.	Not Applicable
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p>	<p>The mill and estates have established its water management plan for 2021. The objective of the plan is to conserve the potable water. Apart from that, to maintain the availability of surface and ground water,</p>	Complied

	<p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>pollution prevention through establishment of riparian zones was also in place.</p> <p>Workers are provided with treated water which mainly sourced from river. The operating units continue to monitor the treated water once a year by assigning a third-party laboratory (SAMM No. 576) to analyse the water quality against the parameters defined in the National Drinking Water Quality Standards (NDWQS). Based on the following reports, the water quality was found to have met the standard:</p> <p>GLYE</p> <p>#20210902/04, dated 16/09/2021</p> <p>#20210902/05, dated 16/09/2021</p> <p>#20210603/07, dated 17/06/2021</p> <p>#20210603/05, dated 17/06/2021</p> <p>#20210302/02, dated 19/03/2021</p> <p>#20210302/01, dated 19/03/2021</p> <p>GTGE</p> <p>#W210323/01/01, dated 23/03/2021</p> <p>#20210603/05, dated 06/06/2021</p> <p>#20210913/03, dated 13/09/2021</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.</p>	<p>The sampled estates have maintained their riparian zones well. It was observed during the site visits efforts to restore the zones were demonstrable. Among the efforts observed were demarcation of riparian zones, restriction of herbicides or fertilizer application in the zones, enrichment of vegetation at GLYE (e.g. collaboration with BORA) to name a few.</p>	<p>Complied</p>

	- Critical (Major) compliance -		
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The mill applies a biological system with ponds in series for its treatment of effluent. The mill discharges its effluent to waterways as permitted by the DOE. The quality of discharged effluent was analysed on monthly basis by an accredited laboratory (SAMM No. 576). Among the parameters analysed are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Based on the analysis report for the past 12 months, the mill has complied the regulated limit i.e. 20 mg/l.</p>	Complied
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill continues to maintain the recording of water use per tonne FFB. Based on the records, the water usage by the mill is as follows: 2021: 1.34 m³/mt FFB as at Oct 2020: 1.06 m³/mt FFB</p>	Complied
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>Plan for improving efficiency of fossil fuel was spelt out in "Management Plan to Improve Efficiency of Diesel Usage". Among the plans established by the operating units were:</p> <p><u>Estate</u></p> <ul style="list-style-type: none"> • regular service of tractors for efficient running of engines • to educate tractor drivers on diesel saving <p><u>Mill</u></p> <ul style="list-style-type: none"> • regular maintenance of machinery to ensure efficiency • to educate tractor drivers on diesel saving • to run turbine longer instead of running diesel generator set • to run minimum number of machines during non-processing hours to reduce load 	Complied

		Monitoring of diesel fuel consumption was done by all the visited operating units. The data was then used for GHG calculating by using the RSPO GHG Calculator.	
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Identification of greenhouse gas (GHG) emissions has been done through the environmental aspect & impact assessment. Among the source of GHG emissions were effluent treatment plant, diesel consumption and fertiliser consumption to name a few. The plan to reduce or minimise the GHG emission has been established and implemented. In general, among the action plans were:</p> <ul style="list-style-type: none"> - To optimise the usage of diesel through regular maintenance of farm tractors, replacement of old tractors and organise harvesting operation to minimise the movement of FFB transporters - To apply more organic fertiliser such as mill compost therefore reducing inorganic fertiliser dependency <p>RSPO GHG Calculator version 4 is used. The consumption of fertilisers and diesel were verified through</p> <p>Estate:</p> <ul style="list-style-type: none"> • Lintramax Store Report • Bin card • store requisition & issuance note <p>Mill:</p> <ul style="list-style-type: none"> • Stock Issue Summary (Lintramax) • Diesel Store Record • store requisition & issuance note 	Complied

		<ul style="list-style-type: none"> Effluent Treatment Plant Log sheet <p>Based on the verification of the above records, all the sampled issuance was traceable.</p>	
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit.	Not Applicable
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	Other significant pollutants were also identified and registered in the environmental aspect and impact assessment. Mitigation plan/control measures were also documented in the same register. Thereafter pollution prevention plan is established. The plan has the information about pollution source, specific concern, mitigation plan, data required and monitoring & action to be taken.	Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	Based on the site visit of the replanting areas at the sampled estates, there was no evidence that fire had been used for land preparation. Oil palms were felled, chipped and windrowed.	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	Fire Prevention and Control Measures [Doc No.: SOP-PD- 12; Revision: 00; Issue Date: Oct 2020] has been established to provide guidance to the estates on the prevention of fire and its management during the dry season and replanting stage should there is any fire breakout.	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	The adjacent stakeholders have been engaged on the company's fire prevention and control measures. The engagement was done mainly through consultation either virtually or physically. Records of meeting were maintained and made available for verification.	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	<p>(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.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	No development within Genting Tanjung POM certification unit.	Not Applicable
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>The CU had re-assessed to collate information relating to HCV. The assessment contained information of both planted area and relevant wider landscape-level, and result HCV identified. The inventory of the HCV sites was conducted in FY2010 by Dr Yap Son Kheong which covered all the Sabah region estates of Genting Plantations. Based on the findings of the assessment, the management and monitoring plan for HCV areas report dated 10/10/2014; High Conservation Value (HCV) areas have been identified such as forested area, river buffer zone, steep terrain, wildlife sanctuary in Genting Tenegang Group Estate. The following aspects areas were assessed as to their state and management.</p> <ul style="list-style-type: none"> • Area of HCV-Shared management of forest reserve and boundary areas/buffer zones • The presence of large mammals and birds and how they are protected from poaches. • IPM: use of plants to attract parasitoids to control bagworms & barn owls for rat management and success • Drainage and the conditions. Determining the presence of fishes as a bio-indicator of water health 	Complied
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	NA	Not Applicable

<p>7.12.4</p>	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>An HCV management plan established based on the result of the assessment mentioned in Indicator 7.12.2. Verification on-site confirmed that the plan was satisfactorily implemented. Among the management plans were:</p> <table border="1" data-bbox="1061 507 1921 1184"> <thead> <tr> <th data-bbox="1061 507 1205 555">HCV</th> <th data-bbox="1205 507 1921 555">Management Plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="1061 555 1205 858">1.1 and 1.2</td> <td data-bbox="1205 555 1921 858"> <ul style="list-style-type: none"> - Place clear boundary markers between the estates and the forest reserve - Place signage on no illegal hunting & collecting, no unauthorised entry - Patrol the boundary area with the forest reserve regularly. Set up SOP on security. - Socialise the HCV Assessment which consists of identification, management and monitoring to all employees - Inform all stakeholders on the HCV assessment and monitoring during stakeholder consultation meetings. </td> </tr> <tr> <td data-bbox="1061 858 1205 1184">4.2</td> <td data-bbox="1205 858 1921 1184"> <ul style="list-style-type: none"> - Establish buffer zones as per Sabah Water Resource Enactment 1998 - Mark palms in red and white paint to show distance of buffer zone - Include the buffer zone and potential erosion area in the map - Land or vegetation cover in the high potential erosion area should be well maintained, or should be improved if necessary - Avoid any weeding or manuring activities on palms within the buffer zones - To place signage informing stakeholders on HCV area - Socialise the importance of conservation of buffer zone to sprayers and general workers </td> </tr> </tbody> </table> <p>Regular patrols within the operating units were carried out and findings were recorded by the respective estate executives to monitor the conservation and riparian zones areas. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented.</p>	HCV	Management Plan	1.1 and 1.2	<ul style="list-style-type: none"> - Place clear boundary markers between the estates and the forest reserve - Place signage on no illegal hunting & collecting, no unauthorised entry - Patrol the boundary area with the forest reserve regularly. Set up SOP on security. - Socialise the HCV Assessment which consists of identification, management and monitoring to all employees - Inform all stakeholders on the HCV assessment and monitoring during stakeholder consultation meetings. 	4.2	<ul style="list-style-type: none"> - Establish buffer zones as per Sabah Water Resource Enactment 1998 - Mark palms in red and white paint to show distance of buffer zone - Include the buffer zone and potential erosion area in the map - Land or vegetation cover in the high potential erosion area should be well maintained, or should be improved if necessary - Avoid any weeding or manuring activities on palms within the buffer zones - To place signage informing stakeholders on HCV area - Socialise the importance of conservation of buffer zone to sprayers and general workers 	<p>Complied</p>
HCV	Management Plan								
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7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -	No local communities have been identified in HCV areas within Genting Tanjung POM certification unit. Thus, this indicator is not applicable.	Not Applicable
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	Education with regards to RTE species is continually given by the management through various methods among other briefing, training, and display of signage at strategic places in the field. Records of training/briefing were maintained by the operating units. Attendance records dated 21/06/2021 (GLYE), 28/07/2021 (GTGE) and 23/10/2021 (for field staff) were made available for verification.	Complied
7.12.7	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. - Minor compliance -	Outcomes of monitoring (HCV monitoring & RTE sighting checklist) are monitored on monthly basis. Reports of monitoring were made available for verification. The monitoring is one of the activities included in the HCV management and monitoring plan of the estates.	Complied
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	There was no land clearing since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Genting Tanjung POM certification unit. Thus, this indicator is not available.	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2020 for Genting Tanjung Oil Mill and supply base was calculated using the PalmGHG Calculator version 4. 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 data 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 2020 for Genting Tanjung Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	3.79
PKO	3.79

Extraction	%
OER	20.05
KER	4.91

Production	t/yr
FFB Process	337,096.00
CPO Produced	67573.02
PKO Produced	16565.27

Land Use	Ha
OP Planted Area	16919.70
OP Planted on peat	-
Conservation (forested)	499.04
Conservation (non-forested)	-
Total	16919.70

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	259698.05	0.96	-	-	-	-	259698.05	0.96
CO ₂ Emission from fertilizer	11244.49	0.04	-	-	-	-	11244.49	0.04
NO ₂ Emission from Peat	-	-	-	-	-	-	-	-
NO ₂ Emission from Fertiliser	10099.81	0.04	-	-	-	-	10099.81	0.04
Fuel Consumption	2351.26	0.01	-	-	-	-	2351.26	0.01
Peat Oxidation	-	-	-	-	-	-	-	-
Sink								
Crop Sequestration	-158397.71	-0.59	-	-	-	-	-158397.71	-0.59
Conservation Sequestration	-4576.20	-0.02	-	-	-	-	-4576.20	-0.02
Total	120419.71	0.45	-	-	36226.03	-	156645.74	0.45

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	161437.58	0.48
Fuel Consumption	697.77	-
Grid Electricity Utilization	-	-
Credit		
Export of Grid Electricity	-	-
Sales of PKS	-	-
Sales of EFB	-	-
Total	162135.36	0.48

Summary of Kernel Crusher Emission and Credit (if applicable)

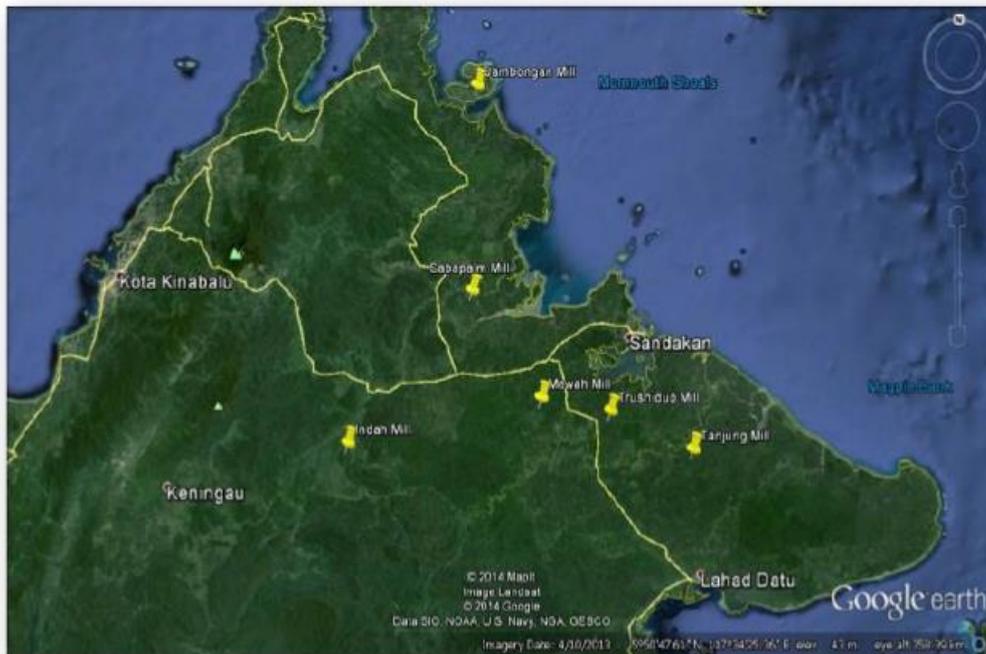
Emissions	tCO ₂ e
PK from own mill	-
PK from other source	-
Fuel Consumptions	-
Total Crusher emissions	-

*This mill has no kernel crusher operation.

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

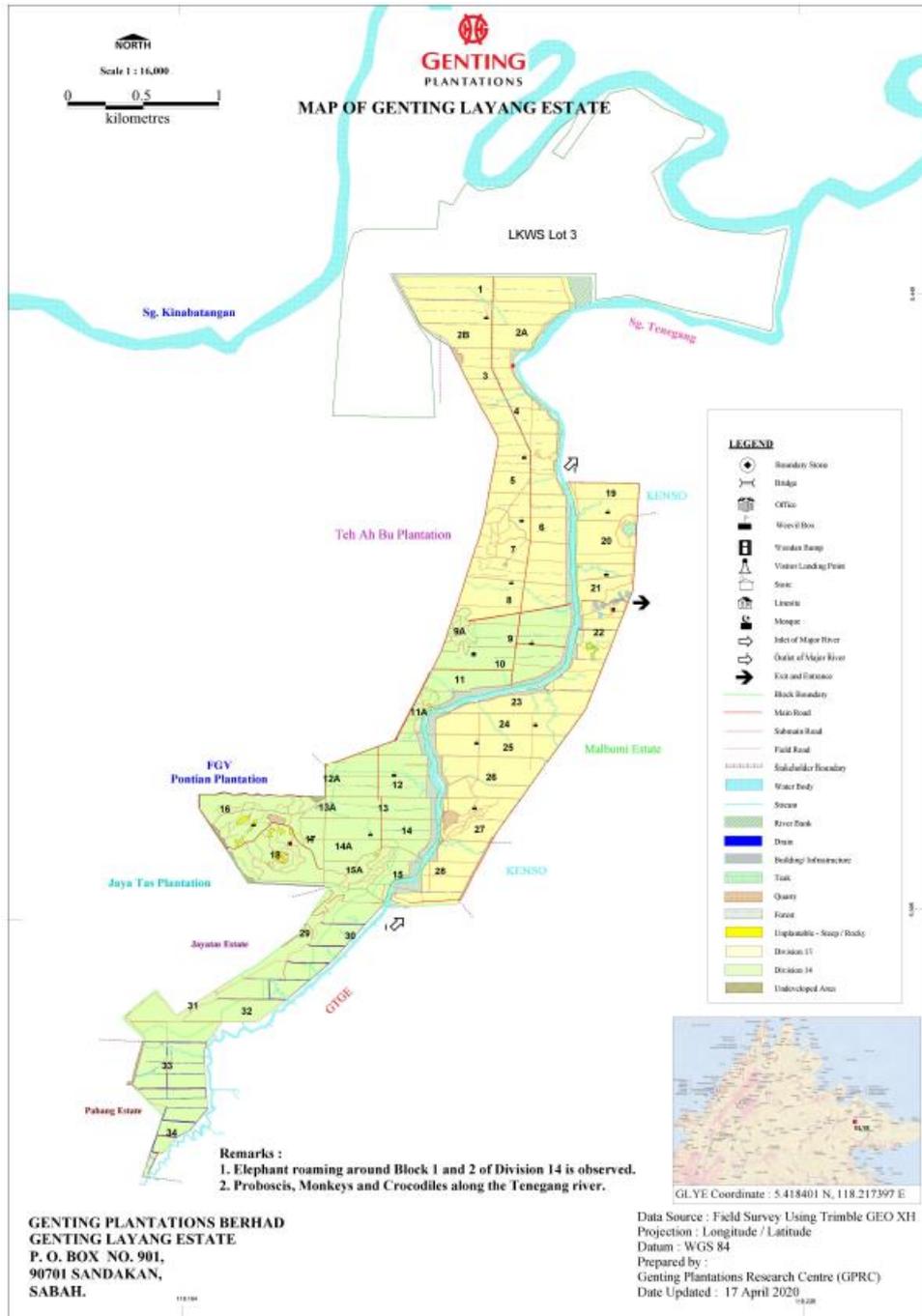
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	-
Divert to methane captured (energy generation) (%)	-

Appendix C: Location Map of Certification Unit and Supply bases

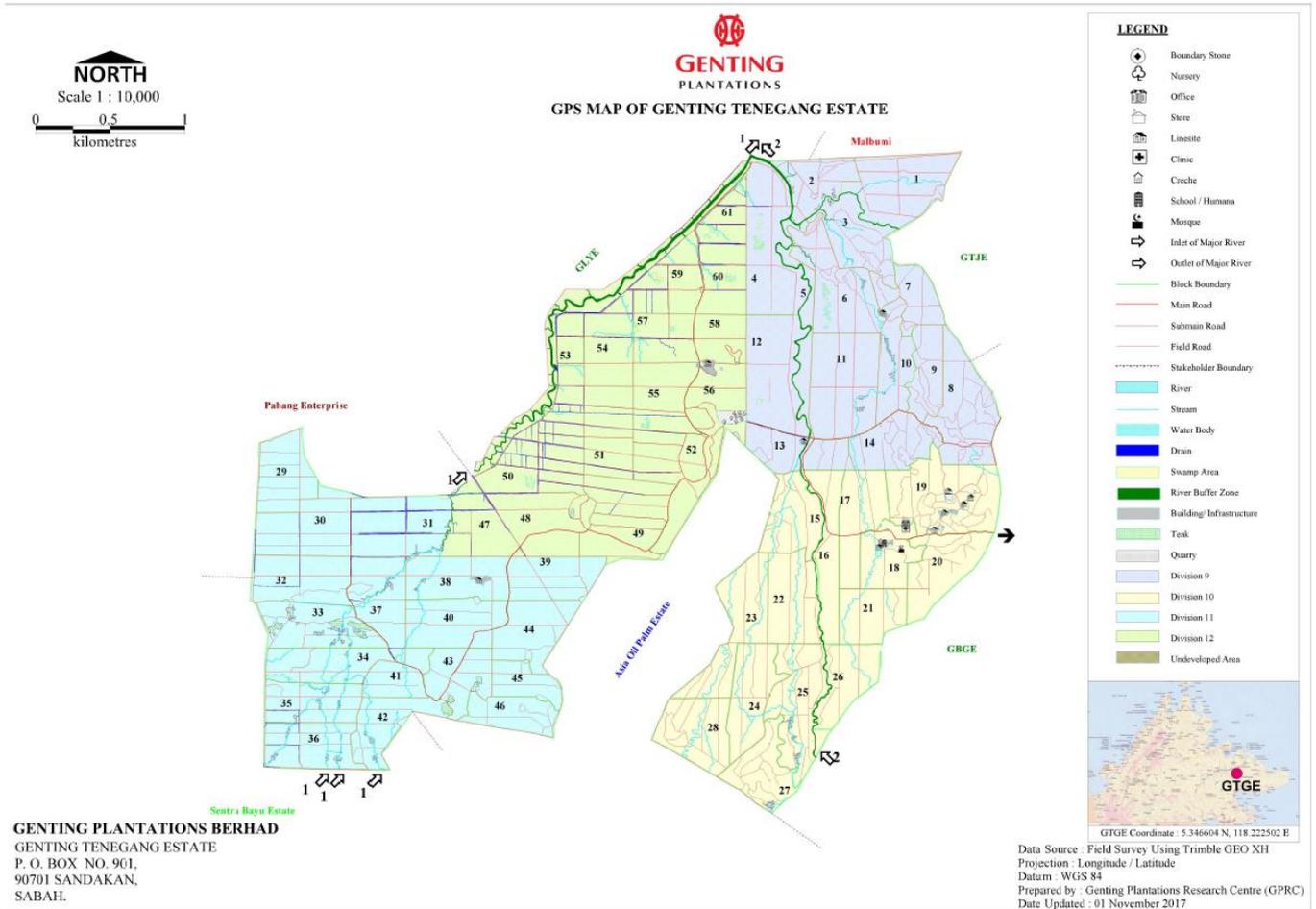


Appendix D: Estate Field Map

Genting Layang Estate



Genting Tenegang Estate



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Appendix E: List of Smallholder Registered and sampled

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

Appendix F: List of Abbreviations

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