

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (3)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company name (Parent Company): FGV Holdings Berhad
Client company Address: Level 20 West, Wisma FGV, Jalan Raja Laut, 50350 Kuala Lumpur, Malaysia
Certification Unit: FGV Palm Industries Sdn Bhd – Keratong 3 Palm Oil Mill
Location of Certification Unit: Off Lebuhraya Tun Razak 26900 Bandar Tun Razak, Pahang, Malaysia
Date of Final Report: 27/04/2022

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	FGV Holdings Berhad		
RSPO Membership Number	1-0225-16-000-00	Membership Approval Date	27/12/2016
Address	Level 20 West, Wisma FGV, Jalan Raja Laut, 50350, Kuala Lumpur, Malaysia.		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	FGVPISB - Keratong 3 Palm Oil Mill		
Location / Address	Off Lebuhraya Tun Razak 26900 Bandar Tun Razak, Pahang, Malaysia		
Website	https://www.fgvholdings.com/home/		
Management Representative	Ameer Izyanif Bin Hamzah	E-mail	ameer.h@fgvholdings.com
Telephone	03-27890497	Facsimile	03-27890440

2. Certification Information			
Certificate Number	RSPO 693213	Certificate Start Date	25/03/2019
Date of First Certification	25/03/2019	Certificate Expiry Date	24/03/2024
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 checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input 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	40 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 693214	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn. Bhd.	05/12/2023
MSPO 693216	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3		05/12/2023

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
FGVPISB Keratong 3 Palm Oil Mill	Kilang Sawit Keratong 3, Off Lebuhraya Tun Razak, 26900 Bandar Tun Razak, Pahang, Malaysia	2° 55' 44.05" N	102° 56' 04.08" E
FGVPM Keratong 11 Estate	Ladang Felda Keratong 11 26900 Bandar Tun Razak, Pahang, Malaysia	2° 53' 08.00" N	103° 01' 05.00" 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
FGVPM Keratong 11 Estate	984.24	-	212.16	1,196.40	82.27
Total	984.24	-	212.16	1,196.40	82.27

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
FGVPM Keratong 11 Estate	378.46	130.99	129.50	345.29	-	605.78	378.46
Total (ha)	378.46	130.99	129.50	345.29	-	605.78	378.46

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7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Mar 2021 – Feb 2022)	Actual (Dec 2020 – Nov 2021)		Forecast (Mar 2022 – Feb 2023)
		Previous license period (Dec 2020 – Feb 2021)	Current license period (Mar 2021 – Nov 2021)	
FGVPM Keratong 11 Estate	10,192.00	3,376.12	6,792.23	10,350.00
Total	10,192.00	10,168.35		10,350.00
Note: -				

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Mar 2021 – Feb 2022)	Actual (Dec 2020 – Nov 2021)		Forecast (Mar 2022 – Feb 2023)
		Previous license period (Dec 2020 – Feb 2021)	Current license period (Mar 2021 – Nov 2021)	
		N/A	N/A	
Total		N/A		
Note: -				

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Mar 2021 – Feb 2022)	Actual (Dec 2020 – Nov 2021)		Forecast (Mar 2022 – Feb 2023)
		Previous license period (Dec 2020 – Feb 2021)	Current license period (Mar 2021 – Nov 2021)	
Felda & FTP	N/A	24,296.86	113,247.81	N/A
External Suppliers	N/A	12,827.90	46,663.82	N/A
Total	N/A	197,036.39		N/A
Note: -				

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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	Dec-20	1,296.80	16,864.57	18,161.37
2	Jan-21	1,071.02	12,126.28	13,197.30
3	Feb-21	1,008.30	8,133.92	9,142.22
4	Mar-21	722.02	18,177.22	18,899.24
5	Apr-21	801.44	18,602.58	19,404.02
6	May-21	842.12	19,649.80	20,491.92
7	Jun-21	837.69	17,340.77	18,178.46
8	Jul-21	1,341.32	17,554.41	18,895.73
9	Aug-21	422.28	11,302.06	11,724.34
10	Sep-21	581.28	22,776.86	23,358.14
11	Oct-21	727.63	18,088.21	18,815.84
12	Nov-21	516.45	16,419.71	16,936.16
TOTAL		10,168.35	197,036.39	207,204.74
Note: -				

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (Mar 2021 – Feb 2022)	Actual (Dec 2020 – Nov 2021)		Forecast (Mar 2022 – Feb 2023)
	Previous license period (Dec 2020 – Feb 2021)	Current license period (Mar 2021 – Nov 2021)	
FFB	FFB		FFB
10,192.00 mt	3,376.12 mt	6,792.23 mt	10,350.00 mt
	10,168.35 mt		
CPO (OER: 21.00 %)	CPO (OER: 20.31 %)		CPO (OER: 21.00 %)
2,140.32 mt	685.69 mt	1,379.50 mt	2,173.50 mt
	2,065.19 mt		
PK (KER: 5.20 %)	PK (KER: 5.15 %)		PK (KER: 5.30 %)
529.98 mt	173.87 mt	349.80 mt	548.55 mt
	523.67 mt		
Note: -			

10A. Monthly Records of Certified CPO & PK since the last audit
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No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Dec-20	219.56	57.96
2	Jan-21	235.03	60.34
3	Feb-21	231.10	55.57
4	Mar-21	153.49	35.97
5	Apr-21	161.28	28.33
6	May-21	146.04	40.64
7	Jun-21	158.83	31.08
8	Jul-21	138.16	40.52
9	Aug-21	157.21	38.87
10	Sep-21	159.41	40.09
11	Oct-21	160.58	43.71
12	Nov-21	144.50	50.59
TOTAL		2,065.19	523.67

Note: -

11. Summary of Actual Volume sold

Current License period (Mar 2021 – Nov 2021)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	-	-	-	1,021.67	1,021.67
PK (MT)	181.30	-	-	283.62	464.92
Credits	730.00	-	-	-	730.00

Previous License period (Dec 2020 – Feb 2021)

CPO (MT)	-	-	-	-	-
PK (MT)	-	-	-	-	-
Credits	169.00	-	-	-	169.00

Note:

Conventional is RSPO certified material but sold as non-RSPO.

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)

No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	A	TR-0ca6f3e9-a7f1	-	43.91
2	B	TR-e5ce0b92-7e1f	-	16.26

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3	A	TR-92ea1a6a-7550	-	45.17
4	A	TR-545e6183-a584	-	45.70
5	A	TR-9f8341af-9e20	-	30.26
TOTAL			-	181.30
Note: -				

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)
Nil	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A
Note: -				

11C. Records of CPO & PK Sold as conventional since the last audit (if any)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	C	473.02	-	
2	D	548.65	-	
3	E	-	123.55	
4	A	-	160.07	
TOTAL		1,021.67	283.62	
Note: -				

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)	
1	B	ST-TR-7c602a74-c7d1	300.00	
2	B	ST-TR-b309ffeb-f078	150.00	
3	B	ST-TR-6ea3814d-5cd5	150.00	
4	B	ST-TR-51ffcd9-9dc9	130.00	
5	B	ST-TR-5007ca35-3208	69.00	
6	B	ST-TR-08f8fdc1-c9d9	50.00	
7	B	ST-TR-a4a212f8-841c	50.00	
TOTAL			899.00	
Note: -				

12. Independent Smallholders Certified Tonnage / Volume									
	Estimated last year (Not Applicable)			Actual (Not Applicable)			Forecast (Not Applicable)		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period (Not Applicable)						
Credits				N/A	N/A	N/A
Physical	N/A	N/A	N/A			
Previous License period (Not Applicable)						
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

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2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 29/11/2021 – 02/12/2021. The audit programme is included as Section 2.3.

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

The 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 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.

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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 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
FGVPISB Keratong 3 Palm Oil Mill	✓	✓	✓	✓	✓
FGVPMSB Keratong 11 Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: December 1, 2022 - December 3, 2022

Total Number of Mandays: 9.0

2.2 BSI Assessment Team

Name	Role	Competency
Hafriazhar Mohd. Mokhtar (HMM)	Team Leader	<p>Education: Holds a Bachelor of Engineering (Hons.) Chemical Engineering, University Technology Malaysia</p> <p>Work Experience: He has 20 years of working experience in multiple engineering disciplines emphasized on science, technology and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation and mining before auditing. In summary, his started his career as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in palm oil mill, Project Control Engineer (2008-2011) in mining and Auditor (2011-present) with accredited certification bodies.</p> <p>Training attended: He has completed Social Auditing & SMETA Training, HCV & HCS Introductory Training, ISO 45001 LA Training, MSPO LA Training, Endorsed RSPO SCCS LA Training, Endorsed RSPO P&C LA Training, ISO 9001 LA Training, ISO 50001 LA Training, and ISO 14001 LA Training</p> <p>Aspect covered in this audit: Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue and RSPO supply chain requirements.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English</p>
Muhamad Naqiuddin Mazeli (MNM)	Team Member	<p>Education: Holds a Bachelor of Science Horticulture, University Putra Malaysia</p> <p>Work Experience: 11 years working experience in oil palm industry managing sustainability implementation and certification of RSPO P&C, ISCC,</p>

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		<p>and ISO9001 and ISO 18001 for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO and other certifications where applicable to the operations during previous company.</p> <p>Training attended: He has completed ISO 9001: 2015 Lead Auditor Course, ISO 14001: 2015 Lead Auditor Course, ISO 45001: 2018 Lead Auditor Course, HCV & HCS Introductory Training, Endorsed RSPO P&C Lead Auditor Course and Social Auditing & SMETA Training</p> <p>Aspect covered in this audit: Occupation Health Safety requirement, HIRARC, Environment responsibility, training, environment impact assessment and management plan, HCV, Supply Chain, General Custody of Chain, Rules on Market Communications & Claims.</p> <p>Language proficiency: Fluent in English and Bahasa Malaysia</p>
Amir Bahari (AB)	Team Member	<p>Education: Holds a Bachelor of Science (Hons) in Chemistry, University Science Malaysia & a Diploma in Palm Oil Milling Tech/Management, Malaysian Palm Oil Board.</p> <p>Work Experience: He has more than 30 years of plantation experience including managing rubber factories, palm oil mills and estates. Since 2014 he has started auditing professionally for varies scheme including RSPO and MSPO for varies accredited certification body.</p> <p>Training attended: He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course & Endorsed RSPO P&C Lead Auditor Course.</p> <p>Aspect covered in this audit: Economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management, GHG</p> <p>Language proficiency: Fluent in English and Bahasa Malaysia</p>

Accompanying Persons:

Name	Role
Nil	N/A

1.3 Assessment Plan

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

Date	Time	Subjects	HMM	MNM	AB
Sunday, 28/11/2021	PM	Audit Team Travelling	✓	✓	✓
Monday, 29/11/2021 Day 1	9:00 AM – 9:30 AM	Opening meeting • Opening presentation by audit team leader • Confirmation of assessment scope and finalize audit plan	✓	✓	✓

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Date	Time	Subjects	HMM	MNM	AB
Keratong 3 Palm Oil Mill	9:30 AM – 1:00 PM	Plant visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, lab, weighbridge, and palm product storage area etc.	✓	✓	✓
	1:00 PM – 2:00 PM	Lunch break	✓	✓	✓
	2:00 PM – 4:30 PM	Document Review P1 – P7: SOPs, review on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> Auditors discussion Day 1 Interim Closing Briefing 	✓	✓	✓
Tuesday, 30/11/2021 Day 2 Keratong 3 Palm Oil Mill (am)	9:00 AM – 1:00 PM	Continue with documentation P1 – P7 SOPs, review on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation	✓	✓	✓
	10:30 AM – 11:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	✓	-	-
	1:00 PM – 2:00 PM	Lunch break	✓	✓	✓
Keratong 11 Estate (pm)	2:00 PM – 4:30 PM	Document Review P1 – P7: SOPs, review on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation,	✓	✓	✓
	2:30 PM – 3:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	✓	-	-
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> Auditors discussion Day 2 Interim Closing Briefing 	✓	✓	✓
Wednesday, 1/12/2021 Day 3 Keratong 11 Estate	9:00 AM – 1:00 PM	Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓

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Date	Time	Subjects	HMM	MNM	AB
	1:00 PM – 2:00 PM	Lunch break	✓	✓	✓
	2:00 PM – 4:30 PM	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.)	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> • Auditors discussion • Day 3 Interim Closing Briefing 	✓	✓	✓
Thursday, 2/12/2021 Day 4 Keratong 3 Palm Oil Mill	9:00 AM – 11:30 PM	Document Review: RSPO SCC general requirements, supply chain for CPO mill, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	✓	-	-
	11:30 AM – 12:30 PM	<ul style="list-style-type: none"> • Interim Closing Briefing • Preparation of audit findings 	✓	-	-
	12:30 PM – 1:00 PM	<ul style="list-style-type: none"> • Closing meeting • Presentation of audit findings 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 plan is inclusive of all current subsidiaries, estates and mills as per time bound plan FY2021. As stated, the management of FGV Holdings Berhad has plan to certify all the complexes starting from 2017 until 2021. The updated time bound plan dated April 2021 shows that the plan spans from year 2017 until 2023.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	33 complexes have been certified from 2017 – 2019 as shown in the TBP below. Remaining 35 mills have undergone internal audit. The time bound plan is behind the scheduled due to tendering process which CB appointment based on yearly selection together with re-suspension by RSPO Complaint Panel for certification processes for all FGV's uncertified units for unsatisfactory findings on non-compliance of the Complaints Panel Decision dated 28/11/2018. (https://www.rspo.org/news-and-events/news/rspo-statement-regarding-complaints-panel-decision-on-felda-global-venture-holdings) On the latest development of suspension, verification audit by RSPO CP being conducted by an independent certification body (CB) appointed by RSPO to assess and verify the implementation of the action plan at 6 FGV units (unit names are confidential). The exercise being carried out since November 2020. The current status is waiting final report from CP as RSPO has informed FGV Holdings Berhad after meeting conducted on 06/12/2021.	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 since the last audit. The previous acquisitions involved Asian Plantations Ltd which was announced since April 2017, hence, certifications plan made available for the acquired unit to be certified within 2020. However, due to the above, the plan has been postponed to a later date until the suspension relief.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	There is a slight delay on certification for the remaining uncertified units due to RSPO Complaint Panel suspension – uplifting decision still pending at RSPO CP side. Refer RSPO letter dated 13 January 2020. Other than that, another possible revision of the TBP involving: 1. Issues pertaining membership as of now FGV management control has been taken over by FELDA through shareholder acquisition. 2. Mills and estates rationalization exercises effective June 2021.	Complied
Have there been any changes to the time-bound plan since the last audit (both new	Yes, as above, changes to the time-bound plan were mainly due to suspension. The latest available ACOP 2020 report has reflective of specific justification that the certification processes have been delayed by compliance on human rights issues which take time to be resolved.	Complied

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<p>acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>In addition to that, FGVPI KS Jerangau Baru have ceased operation effective 01/01/2021 and has been removed from the time bound plan. There are also rationalization plans for FGVPM estates which to be concluded in June 2021. Notification to Scheme Owner as well as to Certification bodies in progress.</p>																					
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>No any isolated lapses in implementation of the plan except the involuntarily suspension of certification plan for uncertified mills complex due to the above. No Minor NC raised since it is the RSPO CP decision.</p>	<p>Complied</p>																				
<p>Have there been any fundamental failure to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>No any fundamental failure to proceed with implementation of the plan except the involuntarily suspension of certification plan for uncertified mills complex due to the above. No Minor NC raised since it is the RSPO CP decision.</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>No replacement after November 2005 that involved primary forest of any area required to maintain or enhance HCVs.</p>	<p>Complied</p>																				
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>New plantings since January 1st 2010 involved the following areas:</p> <table border="1" data-bbox="421 1424 1299 1984"> <thead> <tr> <th>Area</th> <th>ha</th> <th>Status</th> <th>Reference</th> </tr> </thead> <tbody> <tr> <td>FGVPM Tembangau 05 Estate</td> <td>45.84</td> <td>HCVRN Closed – no go</td> <td rowspan="5">https://hcvnetwork.org/reports/hcv-cheGAR-perah-02-estate-bukit-sagu-08-estate-tembangau-05-estate-selendang-03-estate-malaysia/</td> </tr> <tr> <td>FGVPM Chegar Perah 02 Estate</td> <td>59.84</td> <td>HCVRN Closed – Proceed with land clearing. Did not go NPP as this is certified area.</td> </tr> <tr> <td>FGVPM Selendang 03 Estate</td> <td>97.14</td> <td></td> </tr> <tr> <td>FGVPM Bukit Sagu 08 Estate</td> <td>61.54</td> <td></td> </tr> <tr> <td>Tawai 01 Estate</td> <td>2,740.11</td> <td>Date Final published on</td> </tr> </tbody> </table>	Area	ha	Status	Reference	FGVPM Tembangau 05 Estate	45.84	HCVRN Closed – no go	https://hcvnetwork.org/reports/hcv-cheGAR-perah-02-estate-bukit-sagu-08-estate-tembangau-05-estate-selendang-03-estate-malaysia/	FGVPM Chegar Perah 02 Estate	59.84	HCVRN Closed – Proceed with land clearing. Did not go NPP as this is certified area.	FGVPM Selendang 03 Estate	97.14		FGVPM Bukit Sagu 08 Estate	61.54		Tawai 01 Estate	2,740.11	Date Final published on	<p>Complied</p>
Area	ha	Status	Reference																			
FGVPM Tembangau 05 Estate	45.84	HCVRN Closed – no go	https://hcvnetwork.org/reports/hcv-cheGAR-perah-02-estate-bukit-sagu-08-estate-tembangau-05-estate-selendang-03-estate-malaysia/																			
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Tawai 01 Estate	2,740.11	Date Final published on																				

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	<p>Tawai 02 Estate</p>	<p>2,745.58</p>	<p>20 January 2020 - not proceed with NPP. The area will be planted with other crop</p>	<p>https://hcvnetwork.org/reports/hcv-ladang-tawai-1-and-ladang-tawai-2-fgvp-malaysia/</p>	
	<p>Asian Plantation Limited (APL)</p>	<p>25,325.0</p>	<p>HCVRN Closed - proceed with planting subjected to HCSA report for Grand Performance.</p>	<p>https://hcvnetwork.org/reports/felda-global-venture-miri-division-sarawak-state-malaysia/</p>	
	<p>No issue in the uncertified area (Tawai 01, Tawai 02 & APL) since the new planting was cancelled for Tawai 01 & Tawai 02 and not proceed yet for APL. No new planting within FGVMSB Keratong 11 Estate.</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>Based on RSPO RACP tracker updated 1st February 2022, there are four (4) Management Units (MUs) under FGV Holdings Berhad with potential liability and all 4 MUs LUCAs been submitted and 2 completed its review. 3 MUs require Concept Note (CN) while 4 MUs require Remediation Plan (RP).</p>				<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>In reference to RSPO Complaints Panel directive findings dated 30/11/2018 and second letter on 13/01/2020 resulting from the verification audit which was carried out in October 2019 as well as several other internal assessment and external audits findings on recruitment issues particularly on recruitment costs, FGV has taken positive and further steps to ensure that the workers are well informed of FGV policies on the hiring of workers inter alia the cost of recruitment.</p> <p>In addition, since July 2019, FGV has been conducting briefing sessions for its appointed recruitment agencies to communicate and promote understanding about the contents and expectations of the Guidelines and Procedures for the Responsible Recruitment of Foreign Workers. Emphasis is given in particular on ethical recruitment processes and on the non-imposition of recruitment fees by the recruitment agencies on the workers as stipulated in the contract between FGV and the recruitment agencies.</p> <p>Notwithstanding, it is noted that the pre-recruitment costs which include the cost of securing the official documents (ID and passports) and the travel-related cost for these are borne by workers, which some paid to the sub-agent/ agents to assist/ expedite the process.</p> <p>FGV has also revised the contract of Recruitment Agencies Contract to translate FGV's commitment to bear the official costs of recruitments which include, among others, the levy, airfare, cost of medical check-up in</p>				<p>Complied</p>

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	<p>Malaysia and insurance. The revised contract includes new provisions prohibiting the agencies from charging the above fees on workers.</p> <p>In order to ensure recruitment agencies, comply with this requirement around imposition of fee, FGV has conducted a series of socialization programs with agencies and their sub-agents in Lombok (Indonesia) on 30-31/01/2020, Chennai (13/01/2020) and Kolkata (14/01/2020). During this process, FGV explained that the costs associated with the recruitment onwards are covered by FGV and on that basis agents and sub-agents shall not charge workers on similar fee.</p> <p>FGV has also established three One-Stop-Center in sourcing country of workers namely Lombok (Indonesia); Chennai (India) and Kolkata (India) where workers go through pre-departure training programme (which is conducted in collaboration with local labour department); interview and selection process. FGV is continuously conducting a socialization programme comprising a serious of engagement sessions involving various stakeholders.</p> <p>Given the size of FGV’s operations and the large number of its mills and plantations, the socialization programme has being carried out in phases in different locations starting June 2019.</p> <p>These action plans being developed and implemented throughout FGV units to mitigate the issues highlighted in the complaints particularly to labour related issues, and its progress report being reporting quarterly to RSPO Secretariat and can be referred on FGV Sustainability website: https://www.fgvholdings.com/sustainability/reports-updates/.</p> <p>Further to the action plans, RSPO CP has also carried out verification audits through its appointed Certification Bodies to assess the implementation and the effectiveness of the action plans. On the latest development of the verification audit by RSPO COP, another round of assessment being conducted by an independent certification bodies (CB) appointed by RSPO to assess and verify the implementation of the action plan at six FGV units. The exercise being carried out since November 2020. The current status is waiting final report from CP as RSPO has informed FGV Holdings Berhad after meeting conducted on 06/12/2021.</p>	
<p>Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>There is 1 issue happen in FGVPM Palong Timur 04 (Now FGVPM Palong Timur 05) and the details is elaborated below:</p> <ol style="list-style-type: none"> 1. FGVPM PALONG TIMUR 04 (NOW FGVPM PALONG TIMUR 05): Claims on 19.06.2012 with value of summon RM61,968.60 and summon status is Court Appeal. <p>Auditor Verification: During partial audit, 1 issue with DOE in FGVPIB Selancar 2A POM is sighted. Summon no : SJ 53-4/2016 ; Date 14.04.2016 in Mahkamah Seksyen Kuantan.</p> <p>Fixed for Trial on 01.03.2017, 02.03.2017 and 03.03.2017.</p> <p>All process still in progress and CB will verify this issue in next audit or during audit in this mill.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the</p>	<p>Yes. As part of the RSPO P&C compliance, internal audit has been conducted at the uncertified units. Report of improvement was provided for site’s further improvement.</p>	<p>Complied</p>

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<p>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.</p>		
<p>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?</p>	<p>No Critical (Major) non-compliance raised against any of those RSPO P&C criterion during last internal audit of the uncertified units.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Yes. Stakeholders including NGO were consulted in the uncertified units.</p>	<p>Complied</p>

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? 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>	<p>No scheme smallholders and/or scheme outgrowers involved within FGV certification units. Hence, this requirement is not applicable.</p>	<p>Complied</p>

Approved Time Bound Plan

TBP 2021

No	2017	2018	2019	2020	2021
1	KS SELANCAR 2B	KS CHIKU	KS KALABAKAN	KS KEMAHANG	FGV ASIAN MILLING PLANTATION
2	KS ARING A	KS KERATONG 2	KS HAMPARAN BADAI	KS CHINI 2	FGV YAPID MAS (Golden Land)
3	KS SELENDANG	KS SERTING	KS UMAS	KS JERANGAU BARAT	PT CITRA NIAGA PERKASA (Indonesia)- No Mill
4	KS BUKIT SAGU	KS KERATONG 3	KS SELANCAR 2A	KS TROLAK	PT TEMILIA AGRO ABADI (Indonesia)- No Mill
5	KS KERATONG 09	KS KERTEH	KS BUKIT MENDI	KS SEMENCHU	FGV Estates Without mill (Paloh)
6	KS LEPAR UTARA 06	KS KOTA GELANGGI	KS JENGA 8	KS PANCHING	
7	KS MAOKIL	KS TENGGAROH	KS JENGA 18	KS AIR TAWAR	
8	KS KEMASUL	KS SERTING HILIR	KS JENGA 3	KS LOK HENG	
9	KS KRAU	KS NITAR	KS PADANG PIOL	KS SG TENGI	
10	KS LEPAR HILIR	KS JERANGAU BARU	KS TERSANG	KS PASOH	
11	KS KECHAU B	KS KULAI	KS PONTIAN UNITED	KS KAHANG	
12	KS PALONG TIMUR	KS BELITONG	KS TEMENTI	KS SAMPADI	
13	KS TRIANG	KS BUKIT KEPAYANG		KS MEMPAGA	
14	KS BESOUT	KS PENGGELI		KS KEMBARA SAKTI	
15	KS NERAM	KS JENGA 21		KS NILAM PERMATA	
16	KS CHINI 3	KS ADELA		KS MERCU PUSPITA	
17		KS CHALOK		KS LANCANG KEMUDI	
18		KS WAHA		KS EMBARA BUDI	
19				KS BAIDURI AYU	
20				KS TENGGAROH TIMUR	
21					
TOT	16	18	12	20	5

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AL					
	16	34	46	66	71

RSPO	Certified
	External Audit
	Re Certification (Externaly Audited)
	Internal Audit
	Preparation for audit

As at 29 February 2020, **33 mills RSPOcertified** out of 68 mills.
***Seriting (New-Certification)**

TIME BOUND PLAN FORECAST FOR RSPO CERTIFICATION OF ALL FGV PALM OIL MILLS & SUPPLY BASES				
Palm Oil Mill	Supply Bases (estates, plantations, associations)			
	FFB Supplier	Certification Year	Certification Standard	Status
KS SELANCAR 2B	FGVPM Selancar 06	2017	MYNI 2019	Certified
	FGVPM Selancar 08	2017	MYNI 2019	
	FGVPM Selancar 09	2017	MYNI 2019	
KS ARING A	FGVPM Aring 02	2017	MYNI 2019	Certified
	FGVPM Aring 15	2017	MYNI 2019	
	FGVPM Aring 03	2017	MYNI 2019	
	FGVPM Aring 04	2017	MYNI 2019	
	FGVPM Aring 05	2017	MYNI 2019	
	FGVPM Aring 06	2017	MYNI 2019	
	FGVPM Aring 08	2017	MYNI 2019	
	FGVPM Aring 10	2017	MYNI 2019	
	FGVPM Aring 11	2017	MYNI 2019	
KS SELENDANG	FGVPM Selendang 3	2018	MYNI 2019	Certified
	FGVPM Selendang 4	2018	MYNI 2019	
	FGVPM Selendang 5	2018	MYNI 2019	
	FGVPM Berabong 1	2018	MYNI 2019	
KS BUKIT SAGU	FGVPM Bukit Sagu 04	2017	MYNI 2019	Certified

	FGVPM Bukit Sagu 6	2017	MYNI 2019	
	FGVPM Bukit Sagu 07	2017	MYNI 2019	
	FGVPM Bukit Sagu 08	2017	MYNI 2019	
KS KERATONG 9	FGVPM Bera Selatan 05	2017	MYNI 2019	Certified
	FGVPM Bera Selatan 07	2017	MYNI 2019	
	FGVPM Merchong	2017	MYNI 2019	
	FGVPM Keratong Timur	2017	MYNI 2019	
	FASSB Merchong	2017	MYNI 2019	
KS LEPAR UTARA 6	FGVPM Lepar Utara 07	2017	MYNI 2019	Certified
	FGVPM Lepar Utara 08	2017	MYNI 2019	
	FGVPM Lepar Utara 09	2017	MYNI 2019	
	FGVPM Lepar Utara 11	2017	MYNI 2019	
KS MOAKIL	FGVPM Moakil 06	2018	MYNI 2019	Certified
	FGVPM Moakil 07	2018	MYNI 2019	
KS KEMASUL	FGVPM Mengkarak 1	2018	MYNI 2019	Certified
	FGVPM Mengkarak 2	2018	MYNI 2019	
KS KRAU	FVGPM Krau 2	2018	MYNI 2019	Certified
	FVGPM Krau 4	2018	MYNI 2019	
KS LEPAR HILIR	FGVPM Lepar Hilir 05	2017	MYNI 2019	Certified
	FGVPM Lepar Hilir 06	2017	MYNI 2019	

	FGVPM Lepar Hilir 08	2017	MYNI 2019	
KS TRIANG	FGVPM Triang 2	2017	MYNI 2019	Certified
	FGVPM Triang Selatan 1	2017	MYNI 2019	
	FGVPM Triang 4	2017	MYNI 2019	
KS KECHAU B	FGVPM Kechau 06	2017	MYNI 2019	Certified
	FGVPM Kechau 08	2017	MYNI 2019	
	FGVPM Kechau 09	2017	MYNI 2019	
	FGVPM Kechau 10	2017	MYNI 2019	
	FGVPM Kechau 02	2017	MYNI 2019	
	FGVPM Kechau 03	2017	MYNI 2019	
	FGVPM Kechau 07	2017	MYNI 2019	
	FGVPM Kechau 11	2017	MYNI 2019	
	FGVPM Chegar Perah 2	2017	MYNI 2019	
	FGVPM Telang 01	2017	MYNI 2019	
	FASSB Telang	2017	MYNI 2019	
	KS PALONG TIMUR	FGVPM Palong Timur 4/5	2018	
FGVPM Palong Timur 06		2018	MYNI 2019	
KS BESOUT	FGVPM Besout 06	2018	MYNI 2019	Certified
	FGVPM Besout 07	2018	MYNI 2019	
KS NERAM	FGVPM Cherul 03	2018	MYNI 2019	Certified

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KS CHINI 3	FGVPM Terapai 1	2018	MYNI 2019	Certified
	FGVPM Chini Timur 4	2018	MYNI 2019	
KS CHIKU	FGVPM Ciku 4	2018	MYNI 2019	Certified
	FGVPM Ciku 8	2018	MYNI 2019	
KS KERATONG 2	FGVP Bera Selatan 03	2018	MYNI 2019	Certified
KS SERTING	FGVPM Palong 17	2018	MYNI 2019	Re- Certified (External Audit)
	FGVPM Palong 18	2018	MYNI 2019	
	FGVPM Palong 21	2018	MYNI 2019	
	FGVPM Serting Hilir 8	2018	MYNI 2019	
KS KERATONG 3	FGVPM Keratong 11	2018	MYNI 2019	Certified
KS KERTEH	FASSB Kerteh	2018	MYNI 2019	Certified
	FGVPM Semaring 01	2018	MYNI 2019	
KS KOTA GELANGGI	FASSB PPTR	2018	MYNI 2019	Certified
	FASSB K.GELANGGI 5/6	2018	MYNI 2019	
KS JENGA 21	FASSB Jengka 24/25	2018	MYNI 2019	Certified
KS PENGGELI	FGVPM Inas Selatan	2018	MYNI 2019	Certified
KS BELITONG	FASSB Ulu Belitong	2018	MYNI 2019	Certified
	FGVPM Bukit Tongkat B	2018	MYNI 2019	
KS KULAI	FASSB Bkt Besar/Taib Andak	2018	MYNI 2019	Certified
KS ADELA	FGVPM Kledang 2	2018	MYNI 2019	Certified

KS SERTING HILIR	FGVPM Tembangau 03	2018	MYNI 2019	Certified
	FGVPM Tembangau 05	2018	MYNI 2019	
	FGVPM Tembangau 06	2018	MYNI 2019	
	FGVPM Tembangau 07	2018	MYNI 2019	
	FGVPM Tembangau 08	2018	MYNI 2019	
	FGVPM Tembangau 09	2018	MYNI 2019	
	FGVPM Serting Hilir 9	2018	MYNI 2019	
	FASSB Serting Hilir	2018	MYNI 2019	
KS BUKIT KEPAYANG	FGVPM Terapai 3	2018	MYNI 2019	Certified
KS JERANGAU BARU	FGVPM Rantau abang 1	2018	MYNI 2019	Officially closed on 31/12/2020
	FGVPM Rantau abang 2	2021	MYNI 2019	
	FGVPM Chador 1	2018	MYNI 2019	
KS TENGGAROH	FGVPM Tenggaroh 9	2018	MYNI 2019	Certified
	FGVPM Tenggaroh 11	2018	MYNI 2019	
	FGVPM Tenggaroh 13	2018	MYNI 2019	
KS NITAR	FGVPM Nitar Timur	2018	MYNI 2019	Certified
KS CHALOK	FGVPM Setiu 1	2018	MYNI 2019	Certified
KS WA HA	FGVPM BUKIT APING SELATAN	2018	MYNI 2019	Certified
KS KALABAKAN	FGVPM Kalabakan Utara 01	TBC	TBC	Targeted to be certified on Year 2022
	FGVPM Kalabakan Selatan	TBC	TBC	

KS HAMPARAN BADAI	FGVPM Sahabat 23	TBC	TBC	Targeted to be certified on Year 2022
	FGVPM Sahabat 24	TBC	TBC	
	FGVPM Sahabat 26	TBC	TBC	
	FGVPM Sahabat 28	TBC	TBC	
	FGVPM Sahabat 31	TBC	TBC	
	FGVPM Sahabat 33	TBC	TBC	
	FGVPM Sahabat 34	TBC	TBC	
	FGVPM Sahabat 25	TBC	TBC	
	FGVPM Sahabat 22	TBC	TBC	
	FASSB Tambisan	TBC	TBC	
KS UMAS	FGVPM Umas 05	TBC	TBC	Targeted to be certified on Year 2022
	FGVPM Umas 06	TBC	TBC	
KS PONTIAN FICO	Pontian Fico	TBC	TBC	Targeted to be certified on Year 2022
	Pontian Subok	TBC	TBC	
	Pontian Orico	TBC	TBC	
	Pontian Pendirosa	TBC	TBC	
	Pontian Kuril	TBC	TBC	
	Pontian Hillco	TBC	TBC	
	Pontian Korosah	TBC	TBC	
	Blossom Plantation Sdn. Bhd	TBC	TBC	

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KS TEMENTI	FGVPM Bera Selatan 1	TBC	TBC	Targeted to be certified on Year 2022
	FGVPM Bera Selatan 4	TBC	TBC	
KS SELANCAR 2A	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS BUKIT MENDI	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS JENGA 8	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS JENGA 18	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS JENGA 3	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS PADANG PIOL	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS TERSANG	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS KEMAHANG	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS CHINI 2	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS JERANGAU BARAT	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS TROLAK	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS SEMENCHU	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS PANCHING	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS AIR TAWAR	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS LOK HENG	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS SG TENGI	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS PASOH	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS KAHANG	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023

KS MEMPAGA	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS SAMPADI	FGVPM Sampadi 01	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sampadi 03	TBC	TBC	
	FGVPM Sampadi 04	TBC	TBC	
	FGVPM Sampadi 05	TBC	TBC	
	FGVPM Sampadi 06	TBC	TBC	
KS KEMBARA SAKTI	FGVPM Sahabat 30	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sahabat 35	TBC	TBC	
	FGVPM Sahabat 40	TBC	TBC	
	FGVPM Sahabat 41	TBC	TBC	
	FGVPM Sahabat 42	TBC	TBC	
	FGVPM Sahabat 43	TBC	TBC	
KS NILAM PERMATA	FGVPM Sahabat 50	TBC	TBC	Internal Audit
	FGVPM Sahabat 51	TBC	TBC	
	FGVPM Sahabat 52	TBC	TBC	
	FGVPM Sahabat 53	TBC	TBC	
	FGVPM Sahabat 54	TBC	TBC	
KS MERCU PUSPITA	FGVPM Sahabat 07	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sahabat 46	TBC	TBC	
	FGVPM Sahabat 48	TBC	TBC	

	FGVPM Sahabat 10	TBC	TBC	
	FASSB Sahabat 06	TBC	TBC	
KS LANCANG KEMUDI	FGVPM Sahabat 36	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sahabat 38	TBC	TBC	
	FGVPM Sahabat 39	TBC	TBC	
	FGVPM Sahabat 44	TBC	TBC	
	FGVPM Sahabat 45	TBC	TBC	
KS EMBARA BUDI	FGVPM Sahabat 11	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sahabat 12	TBC	TBC	
	FGVPM Sahabat 17	TBC	TBC	
	FGVPM Sahabat 56	TBC	TBC	
	FGVPM Sahabat 20	TBC	TBC	
	FASSB Sahabat 17	TBC	TBC	
	FGVPM Sahabat 21	TBC	TBC	
KS BAIDURI AYU	FGVPM Sahabat 09	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sahabat 16	TBC	TBC	
	FGVPM Sahabat 55	TBC	TBC	
KS TENGGAROH TIMUR	FGVPM Tenggaroh 12	2021	TBC	Targeted to be certified on Year 2023
	FGVPM Tenggaroh Timur 2	TBC	TBC	
	Incosetia Sdn. Bhd	TBC	Group Cert	Internal Audit

Asian Plantation Milling Sdn. Bhd	Kronos plantations Sdn. Bhd	TBC	Group Cert	
	Fortune Plantation Sdn. Bhd	TBC	Group Cert	
	BJ Corporation Sdn. Bhd	TBC	Group Cert	
Tanah Emas Oil Palm Processing	Sri Kehuma	TBC	Group Cert	Internal Audit
	Yapidmas AE	TBC	Group Cert	
	Tanah Emas Corporation Berhad (TECB)	TBC	Group Cert	
	Ladang Kluang	TBC	Group Cert	
	Yapidmas D	TBC	Group Cert	
	Sri Mosta 1	TBC	Group Cert	
	Sri Mosta 2	TBC	Group Cert	
	Sri Mosta 3	TBC	Group Cert	
	Cepat Ringgit A	TBC	Group Cert	
	Cepat Ringgit B	TBC	Group Cert	
	Cepat Ringgit D	TBC	Group Cert	
	Karamuak	TBC	Group Cert	
	Sg Milian	TBC	Group Cert	
	Sg Imbak	TBC	Group Cert	
	Kuamut	TBC	Group Cert	
PT CITRA NIAGA PERKASA	TBA	TBC	INA-NIWG	Internal Audit
PT TEMILIA AGRO ABADI	TBA	TBC	INA-NIWG	Internal Audit

FGV estate without mills	FGVPM Paloh	2018	MYNI 2019	Certified under Kulim (M) Berhad – Tereh POM
Estate under RaCP	TBA	TBC	MYNI 2018	Internal Audit

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 one (1) Minor nonconformity and two (2) Opportunity For Improvement (OFI) raised. The FGV Palm Industries Sdn. Bhd. Keratong 3 Palm Oil Mill and Supply Base 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 below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2134547-202111-N1	Date Issued	02/12/2021
Due Date	Next assessment	Date of nonconformity Closure	Open
Clause & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	The implementation of waste material storage is ineffective.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	Keratong 3 POM - During the site visit to the mill compound / processing plant it was observed that presence of residual materials, scrap materials and maintenance parts were evident without proper storage and segregation.		
Corrections:	<ul style="list-style-type: none"> - Appoint contractor to transfer the shredded fiber from scrap materials storage area and shell bay area - Perform cleaning work to segregate all the residual materials, scrap materials and maintenance part to the designated area - Build or make proper signage 		
Root Cause Analysis:	<ul style="list-style-type: none"> - Not enough space for proper storage and segregation due to the high stock of shredded fiber - No signage of designated area for storage material part and scrap materials. 		
Corrective Actions:	Contact with by product department HQ to find new buyer or increase the pickup of shredded fiber from existing buyer to reduce the current stock and overproduction.		
Assessment Conclusion:	CAP has been accepted. Evidence of effectiveness to be verified during next coming assessment.		

Opportunity for Improvements	
OFI #	Description
2134547-202111-I1	7.2.3: Keratong 11 Estate - Existence of beneficial plants in the fields visited to support effective ratio of IPM management beneficial plant protocol as per SOP in Manual Lestari could be further improved

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2134547-202111-I2	3.6.2: Monitoring of the effectiveness of the H&S plan to address health and safety risks to people related to use of First Aid Kit for use in estate field operation could be further improve on the kit content availability/usability.
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Positive Findings	
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PF #	Description
PF 1	Good social contributions as per external stakeholders' feedbacks.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1992765-202010-M1	Date Issued	03/12/2020
Due Date	02/03/2021	Date of nonconformity Closure	22/02/2021
Clause & Category (Critical / Minor)	3.6.1 (Critical)		
Statement of Nonconformity:	The safe operating procedure was not adequately implemented.		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p>Ref.: Garispanduan Keselamatan & Kesehatan Pekerjaan (Occupational Safety & Health Guidelines) SOP No. FGVPM/L3/GPK-017, effective from 1/2/2020, Jentera Mengangkut Bahan & Hasil Petanian (Transportation of Materials and Agriculture Crop).</p> <p>There is no evidence that the "Borang Pemeriksaan Kenderaan Ladang" (Farm Tractors Inspection Form) for tractors transporting FFB has been utilized by Keratong 11 Estate as required by the SOP No. FGVPM/L3/GPK-017.</p>		
Corrections:	<ol style="list-style-type: none"> 1. Conduct SOP training to all estate operating machinery driver workers. 2. Issue a letter of instruction to conduct daily inspections on the operating machine and all relevant staff before commencing work using 'Borang Pemeriksaan Kenderaan Ladang'. 3. Issue a letter of appointment for a local machinery driver who is responsible for carrying out the inspection of mini kubota machinery and record using 'Borang Pemeriksaan Kenderaan Ladang'. 4. Provide a specific log book for each estate operating machinery that records daily inspection activities, periodic maintenance, work activities performed, oil consumption. 5. The logbook of estate operation machinery is checked by the estate management every month as a method of monitoring SOP compliance. 		
Root Cause Analysis:	SOPs are not implemented consistently by project management as there is no enforcement monitoring mechanism and corrective action is implemented immediately to ensure SOPs are complied with by the responsible staff.		

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Corrective Actions:	<ol style="list-style-type: none"> 1. Officers in charge at the estate management level was given continuous SOP information and training to enhance good understanding. 2. Update the annual training programs by including training programs for all SOPs as well as comprehension assessments to increase understanding of SOP compliance implementation. 3. Provide a letter of responsibility to the local machinery driver to carry out inspection of the mini kubota machinery and record.
Assessment Conclusion:	<p>The following evidences were verified:</p> <ol style="list-style-type: none"> 1. Training records on SOP to machinery drivers dated 24/12/2020 2. Samples of "Borang Pemeriksaan Kendaraan Ladang" (Plantation Vehicles Inspection Form) that had been utilised 3. Copy of the logbook content that shows the "daily inspection records" 4. Samples of the logbook were checked by the estate management 5. Updated annual training programmes for 2021 6. Copy of the letter from the management to the local machinery drivers dated 30/12/2020, instructing the drivers to carry out machinery inspection on regular basis <p>The evidence of correction and corrective actions were found to be adequate to close the major NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment.</p>
ASA 3 Verification	<p>During the on-site assessment in FGV Keratong 3 POM and estates, it was found that FGV Plantations (M) Sdn. Bhd. launched an Occupational Safety & Health Objectives 2021 "Zero Fatality of Occupational Accident" signed by Mohd. Sarian Md. Sahid (CEO), Date: 2/1/2021 on highest risk of hazard involving field activities as following:</p> <ul style="list-style-type: none"> - Transport of workers and plantation material/yard - Heavy machine work activity - Sharp tool use activity <p>No recurrence of issue found hence confirmed the effectiveness of the CAP. Thus, Critical NC remained closed.</p>

Non-conformity			
NCR Ref #	1992765-202010-M2	Date Issued	03/12/2020
Due Date	02/03/2021	Date of nonconformity Closure	22/02/2021
Clause & Category (Critical / Minor)	3.8.6 (Critical)		
Statement of Nonconformity:	The handling of non-conformities raised from the internal audit was not in accordance to established procedure.		
Requirement Reference:	Internal Audit The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;		

	<ul style="list-style-type: none"> • Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. effectively implements and maintains the standard requirements within its organisation. <p>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 nonconformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>
Objective Evidence:	<p>Ref.: FGV's Internal Audit Procedure [FGV/ML-1A/L2-Pr11, rev. 0, 1/6/2016], Clause 6.7.2, which reads: "Pihak projek yang diaudit perlu menunjukkan bukti penutupan ketidakpatuhan dalam bentuk dokumentasi dan bukti gambar selewat-lewatnya dua minggu selepas audit dalaman" (The audited project site has to show the close-out evidence of non-conformity reports in form of documents and pictures not later than two weeks after the internal audit).</p> <p>The internal audit for RSPO SCCS for Keratong 3 POM was conducted on 17-18/8/2020 by FGV's Sustainability & Environmental Department (SED), Mr. Mohd Yusuf Salbani. He had raised 3 non-conformity reports as a result of the audit.</p> <p>However, there is no evidence that the non-conformity reports have been addressed according to FGV's internal audit procedure.</p>
Corrections:	<ol style="list-style-type: none"> 1. Implement sending Email communication with the officer in charge of FGVT and a copy of the SCCS internal audit report is provided for reference and action. 2. Implement the closing action of SCCS internal audit issues as recommended.
Root Cause Analysis:	<p>The issues stated in the SCCS internal audit report require action from the FGV Trading Department (FGVT) HQ to make any verification and changes in the RSPO IT system (RSPO palm trace system) which can only be done and controlled by the officer in charge.</p> <p>There was no communication between the management of the Keratong 3 POM and the officer in charge of the FGV Trading Department (FGVT) in ensuring that the issues found in the internal audit could be taken appropriate action and the SCCS internal audit findings were not included in the separate RSPO P&C internal audit action plan for review.</p>
Corrective Actions:	<ol style="list-style-type: none"> 1. The issue of non-compliance findings from SCCS internal audit is included in the RSPO P&C internal audit findings report so that monitoring coordination can be implemented. 2. Provide retraining to the relevant SCCS RSPO officers in POM, Internal Audit Procedure [FGV / ML-1A / L2-Pr11, rev. 0, 1/6/2016] so that the officer concerned is more sensitive and complies with the procedures used. 3. Reminder letter to the traceability officer appointed for failing to take action and make a reference to ensure that all SCCS internal audit issues are implemented as recommended.
Assessment Conclusion:	<p>The following evidences were verified:</p> <ol style="list-style-type: none"> 1. Copy of the email communication between the mill and FGV Trading Department 2. Copy of the email communication between the mill and the internal auditor that shows the corrective actions and evidence have been accepted/closed by the internal auditor

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	<p>3. RSPO P&C internal audit findings report that shows the issue of noncompliance findings from SCCS internal audit has been included</p> <p>4. Retraining record on Internal Audit Procedure [FGV / ML-1A / L2-Pr11, rev. 0, 1/6/2016], dated 7/1/2021</p> <p>5. A copy of the reminder letter to the traceability officer dated 28/12/2020</p> <p>The evidence of correction and corrective actions were found to be adequate to close the major NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment.</p>
ASA 3 Verification	<p>During the on-site assessment in FGV Keratong 3 POM and estates, it was found that procedure namely SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 was established which covered the internal audit under Sustainability & Environmental Department (SED), FGVH responsibility. The internal audit will be plan annually before CB audit. The internal audit procedure is cross-referred to SOP: FGV/ML-1A-L2-Pr11 issue 1 dated 01.06.2016.</p> <p>Latest internal audit was conducted on 20/9/2021 – 24/9/2021. Findings from internal audit was discussed in the management review meeting conducted on 28/10/2021.</p> <p>No recurrence of issue found hence confirmed the effectiveness of the CAP. Thus, Critical NC remained closed.</p>

Non-conformity			
NCR Ref #	1992765-202010-N1	Date Issued	03/12/2020
Due Date	02/12/2021	Date of nonconformity Closure	29/11/2021
Clause & Category (Critical / Minor)	2.1.2 (Minor)		
Statement of Nonconformity:	The mechanism to ensure compliance with one of the conditions in the DOE License Compliance Schedule was not effective.		
Requirement Reference:	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.		
Objective Evidence:	<p>Ref.: Jadual Permatuhan (Compliance Schedule), No. Lesen 005103 issued by Department of Environment, Pahang State– JP/KKS/2020/2021/005103 - Pengurusan Buangan Pepejal Kelapa Sawit (Oil Palm Solid Wastes Management), Clause No. 22.</p> <p>Based on the feedback from Sustainability In charge, the POM Management has the intention to apply for the “Jadual Pelanggaran” (Contravene License) with regards to non-compliance with the location of the EFB storage. However, during the audit assessment, there is no application has been made to the Department of Environment thus far.</p>		
Corrections:	<ol style="list-style-type: none"> Issue reminder letters to responsible staff to ensure legal compliance is taken seriously immediately and involves KPI performance appraisals being assessed. POM management prepares EFB management action plans for short term, long term and emergency are available. Perform cleaning work and transfer of EFB waste piles to designated drainage areas refer to EFB storage location plan Compliance schedule. 		

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	4. Appoint a work contract to send the excess EFB to the estate as a action to reduce the EFB stacks are laid in unauthorized areas.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Issue reminder letters to responsible staff to ensure legal compliance is taken seriously immediately and involves KPI performance appraisals being assessed. 2. POM management prepares EFB management action plans for short term, long term and emergency are available. 3. Perform cleaning work and transfer of EFB waste piles to designated drainage areas refer to EFB storage location plan Compliance schedule. 4. Appoint a work contract to send the excess EFB to the estate as a action to reduce the EFB stacks are laid in unauthorized areas.
Corrective Actions:	<ol style="list-style-type: none"> 1. Existing legal compliance mechanisms such as from internal audit reports, work area checklists are taken into account by updating daily actions during the morning meeting on legal compliance issues. 2. Strict action is taken by the POM management by taking action against the Head of the responsible staff who failed to comply with the legal requirements subject to a reminder letter action that will affect the evaluation of KPI performance.
Assessment Conclusion:	The correction and CAP were accepted. The evidence of effective implementation of the CAP shall be verified in the next assessment.
ASA 3 Verification	<p>During the on-site assessment in FGV Keratong 3 POM and estates, it was found that Keratong 3 POM as per HIRADC Form # FGV/PUC-OSH/F1.2; Rev. 0; Latest updated 15/2/2021 with additional Assessment specific on issue of EFB Fibre & Shredded Fibre accumulation within mill compound.</p> <p>No recurrence of issue found hence confirmed the effectiveness of the CAP. Thus, Minor NC has been closed on 29/11/2021.</p>

Non-conformity			
NCR Ref #	1992765-202010-N2	Date Issued	03/12/2020
Due Date	02/12/2021	Date of nonconformity Closure	29/11/2021
Clause & Category (Critical / Minor)	2.2.2 (Minor)		
Statement of Nonconformity:	Due diligence was not available.		
Requirement Reference:	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p>		
Objective Evidence:	<p>At Keratong 11 Estate, a contractor was appointed by the management to transport FFB from ramp to mill has signed an agreement (Contract No.: 5300002395). The contractor has appointed a sub-contractor to be the lorry driver. However, there was no written consent between the main contractor and FGVMSB sighted. This does not comply with Terma dan Syarat bagi Pesanan</p>		

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	Belian (PB)/ Perintah Kerja (PK) [Terms and Conditions for Purchasing/Work Order] 1/2013, Clause 12 – Tugas dan Perlantikan Sub-kontraktor [Tasks and Appointment of Sub-contractor] and Document Contract, Clause 13 – Assignment of Sub-Contracting.
Corrections:	<p>Provide joint agreement documents between FGVP management and main contractors for the appointment of sub-contractors;</p> <ol style="list-style-type: none"> 1. Letter of notification of application for appointment of sub-contractor by the main contractor to the regional procurement unit for consideration of permission stating the reason for the need. 2. Letter of decision for permission on the application for appointment of sub-contractors by the main contractor from the FGVP Procurement unit of the province stating the conditions to be complied with. 3. Procurement department issues a letter of notification to all contractors to comply with the terms in the work contract, among them need to inform and obtain the consent of any sub-contractor appointment. 4. Procurement department provides clear information to projects related to contractor requirements to comply with the terms of the Terms and Conditions for Purchase / Work Order] 1/2013, Clause 12 - Assignment and Appointment of Sub-contractors [Duties and Appointment of Sub-contractors] and Contract Documents, Clause 13 - Submission of Sub-Contract to be complied with.
Root Cause Analysis:	SOPs are not implemented consistently by project management as there is no enforcement monitoring mechanism and corrective action is implemented immediately to ensure SOPs are complied with by the responsible staff.
Corrective Actions:	<ol style="list-style-type: none"> 1. There is a SOP enforcement monitoring mechanism for estate management from the regional procurement department officers who are implemented regularly through internal audits and project visits. 2. Officers in charge at the estate management level and contractors are given continuous SOP information and training to enhance good understanding.
Assessment Conclusion:	The correction and CAP were accepted. The evidence of effective implementation of the CAP shall be verified in the next assessment.
ASA 3 Verification	<p>During the on-site assessment in FGV Keratong 3 POM and estates, it was found that Contract contain specific clauses on meeting applicable legal requirements including FFB suppliers as per sample for Keratong 3 POM FFB purchase agreements as following:</p> <ul style="list-style-type: none"> - Supplier: Bakti Mas Bina Sdn. Bhd.; Agreement # (62) FPISB/FFBPD/8877; Date: 26/10/2018; Supplier Code of Conduct (SCOC) signed date: 2/1/2021; Doc. V 001.05.2020 - Supplier: Seng Highland Fruits Trading; Agreement # (16) FPISB/FFBPD/8762; Date: 26/10/2018; Supplier Code of Conduct (SCOC) signed date: 3/1/2021; Doc. V 001.05.2020 <p>Keratong 11 Estate a per sample FFB purchase agreements as following:</p> <ul style="list-style-type: none"> - Supplier: Sri Bintang Trading; Agreement (SPK) # 5600004026; Date: 16/4/2021; Supplier Code of Conduct (SCOC) signed date: 18/4/2021; Doc. V 001.05.2020 <p>Evidence of legal due diligence of contracted parties available as per SCOC sighted.</p>

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	No recurrence of issue found hence confirmed the effectiveness of the CAP. Thus, Minor NC has been closed on 29/11/2021.
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Non-conformity																											
NCR Ref #	1992765-202010-N3	Date Issued	03/12/2020																								
Due Date	02/12/2021	Date of nonconformity Closure	29/11/2021																								
Clause & Category (Critical / Minor)	3.3.2 (Minor)																										
Statement of Nonconformity:	The mechanism to check consistent implementation of procedure was not satisfactorily demonstrated.																										
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.																										
Objective Evidence:	<p>The following lapses were found at Keratong 11 Estate:</p> <ol style="list-style-type: none"> As per the Penyerahan & Penyimpanan Passport TKA semasa dalam Perkhidmatan [Submission & Retention of Foreign Labour Passport while In-service] (Doc. No.: FGV/FGVPM-JTK/OP/021, Rev. 0 dated 01/09/2019, Clause 6.5.6, the person responsible has to conduct inspection on the passport that kept in the locker provided by the company on monthly basis and record of inspection must be documented. However, there was no record of inspection was carried out. Reviewed of the pay slips and Kad Kerja (Workday Card), it was found that the workers did not receive RM1,200 as per company's guidance (Ref. No.: (01)HREO/WW/01/1/2020) dated 05/03/2020 issued by Human Resource Department (Plantations) in FGV Holdings. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Month</th> <th style="width: 40%;">Employee No.</th> <th style="width: 40%;">Wages</th> </tr> </thead> <tbody> <tr> <td rowspan="3">August 2020</td> <td>FW04830553</td> <td>RM 1,169.92</td> </tr> <tr> <td>FW04830551</td> <td>RM 1,165.80</td> </tr> <tr> <td>FW04830555</td> <td>RM 1,169.86</td> </tr> <tr> <td rowspan="3">September 2020</td> <td>FW04830553</td> <td>RM 1,188.44</td> </tr> <tr> <td>FW04830468</td> <td>RM 1,190.94</td> </tr> <tr> <td>FW04830513</td> <td>RM 1,196.48</td> </tr> <tr> <td rowspan="3">October 2020</td> <td>FW04830555</td> <td>RM 1,186.54</td> </tr> <tr> <td>FW04830468</td> <td>RM 1,190.94</td> </tr> <tr> <td>FW04830553</td> <td>RM 1,185.74</td> </tr> </tbody> </table> <ol style="list-style-type: none"> Based on the "Rekod Pengurusan Alat Perlindungan Diri" (Records of PPE Management) [FGV/FGVPM/GP/F (PK-25)/1.4, the following lapses were found: <ul style="list-style-type: none"> No records of PPE issuance for two workers namely Ali Ramesh (FFB loader) and Riki Martin (sprayer) No records of safety shoes being issued to two sprayers namely Iman Miah and Shankar Peddola 			Month	Employee No.	Wages	August 2020	FW04830553	RM 1,169.92	FW04830551	RM 1,165.80	FW04830555	RM 1,169.86	September 2020	FW04830553	RM 1,188.44	FW04830468	RM 1,190.94	FW04830513	RM 1,196.48	October 2020	FW04830555	RM 1,186.54	FW04830468	RM 1,190.94	FW04830553	RM 1,185.74
Month	Employee No.	Wages																									
August 2020	FW04830553	RM 1,169.92																									
	FW04830551	RM 1,165.80																									
	FW04830555	RM 1,169.86																									
September 2020	FW04830553	RM 1,188.44																									
	FW04830468	RM 1,190.94																									
	FW04830513	RM 1,196.48																									
October 2020	FW04830555	RM 1,186.54																									
	FW04830468	RM 1,190.94																									
	FW04830553	RM 1,185.74																									

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	- There was no signature put by any workers in the records despite blank spaces were provided for them
Corrections:	<ol style="list-style-type: none"> 1. Re-implement the monitoring record of employee passport storage boxes every month by the Foreign Worker Affairs Officer (HEP). 2. Estate management especially HEP officers are trained and have good knowledge related to SOP management of foreign workers. 3. Regional JTK officers conduct periodic SOP compliance inspections as a enforcement mechanism to estate management. <ol style="list-style-type: none"> 1. Provide a record format for monitoring employees who do not reach the minimum wage every month reviewed by estate management and action every month. 2. A reminder letter is given to the staff supervising the employment of employees so that monitoring of employee employment is done every week . 3. Conduct investigations by JTK regional officer for employees who do not achieve the minimum wage whether the problem of low productivity is due to poor monitoring of officers or employees' failure to comply with the prescribed work discipline. 4. Consultation discussions and mutual agreement are implemented to the group of employees who do not reach the minimum wage monitored every month of development. 5. Provide regular training related to the minimum wage payment method to all employees as it improves the understanding of salary calculation and productivity methods. <ol style="list-style-type: none"> 1. Complete PPE management records provided by the responsible officer. 2. PPE submission records are provided according to the form format in the SOP. 3. Conduct briefings to employees on the need for new PPE supply and free replacement, ensure that the PPE acceptance record is completed signed by the employee and the PPE provided complies with the established PPE specifications.
Root Cause Analysis:	SOPs are not implemented consistently by project management as there is no enforcement monitoring mechanism and corrective action is implemented immediately to ensure SOPs are complied with by the responsible staff.
Corrective Actions:	<ol style="list-style-type: none"> 1. There is a SOP enforcement monitoring mechanism for estate management from the regional procurement department and regional Labor Department (JTK) officers who are implemented regularly through internal audits and project visits. 2. Officers in charge at the estate management level and contractors are given continuous SOP information and training to enhance good understanding. 3. Estate management monitors the employment of workers on a weekly basis so that immediate corrections can be implemented for workers with low productivity and not achieving a minimum wage. 4. Estate management conducts ongoing discussions with foreign workers to improve the discipline and understanding of workers to achieve the set minimum wage.

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	5. Review of PPE management records by estate management on a monthly basis
Assessment Conclusion:	The correction and CAP were accepted. The evidence of effective implementation of the CAP shall be verified in the next assessment.
ASA 3 Verification	<p>During the on-site assessment in FGV Keratong 3 POM and estates, a sample of total 20 payslips of the workers in mill and estate found that the wages of the workers are paid accordingly to the Minimum Wage 2020. Overtime was paid as per Employment Act 1955. Deduction was made accordance to the approval granted by <i>Jabatan Tenaga Kerja Semenanjung Malaysia</i>. Interviewed with the workers confirmed that they were understand on the terms and condition of the employment contract signed by them. They also understand the calculation on the wages and overtime shown in the payslips.</p> <p>No recurrence of issue found hence confirmed the effectiveness of the CAP. Thus, Minor NC has been closed on 29/11/2021.</p>

Non-conformity			
NCR Ref #	1992765-202010-N4	Date Issued	03/12/2020
Due Date	02/12/2021	Date of nonconformity Closure	29/11/2021
Clause & Category (Critical / Minor)	3.4.2 (Minor)		
Statement of Nonconformity:	The social management plan has not been comprehensively completed.		
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:	<p>Some of the impacts' changes in Keratong 11 Estate were not identified in the management plan:</p> <ol style="list-style-type: none"> 1. Delaying in the MyEG service provider on payment which caused the FOMEMA result of workers expired. 2. Deduction of water was made since October 2019 for total RM10 after the Regional Control Unit's visit on 07/10/2019. 3. Monitoring of the recruitment fee by the sub-agent in source of country. 		
Corrections:	<ol style="list-style-type: none"> 1. Conduct SIA evaluation for review with the involvement of all stakeholders involved and changes in the impact on stakeholders are assessed. 2. Provide the latest SIA procedures that have been approved by management to be implemented. 3. Provide training on SIA assessment procedures to responsible staff to improve skills to identify the impact of SIA on projects. 4. Submit a social impact assessment (SIA) report using the latest SIA procedure format. 		
Root Cause Analysis:	The latest SIA procedures are still in the management approval process where any changes in the impact on stakeholders from the project management decision have been identified in the latest SOP.		

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	The revision of the existing SIA plan review could not be carried out by the estate management due to lack of skills in conducting a comprehensive social impact assessment and responsible sustainability officers could not enter the project area due to Covid-19 (PKPB) infectious disease control directive factor effective from March 2020 among the causes of such effects are not identified in the project.
Corrective Actions:	Responsible officers at the estate level can implement and identify new impact changes to provide a more complete management action mitigation plan.
Assessment Conclusion:	The correction and CAP were accepted. The evidence of effective implementation of the CAP shall be verified in the next assessment.
ASA 3 Verification	<p>During the on-site assessment in FGV Keratong 3 POM and estates, it was found that a Social Management Plan was developed in Keratong POM on 28/11/2021. The impact/ issue raised during assessment were recorded in the management plan as per sample as following:</p> <ol style="list-style-type: none"> 1. Impact: The price for food in canteen was not available and fluctuate; Actions to be taken: To ensure the canteen put the price; Status: verified on 10/1/2021 2. Impact: Process to renew passport and permit slow; Actions to be taken: To submit the passport 2 months before the expiry date. Status: Seen the list of permits FW04830069 that expired on Dec 2021 and the management has submitted to HQ for renewal on 22/11/2021. Seen the Borang Pengesahan Penambahan Permit/ Penamatan Kontrak TKL. <p>No recurrence of issue found hence confirmed the effectiveness of the CAP. Thus, Minor NC has been closed on 29/11/2021.</p>

Non-conformity			
NCR Ref #	1992765-202010-N5	Date Issued	03/12/2020
Due Date	02/12/2021	Date of nonconformity Closure	29/11/2021
Clause & Category (Critical / Minor)	7.3.3 (Minor)		
Statement of Nonconformity:	The management for scheduled wastes and non-scheduled wastes was not implemented and effectively monitored.		
Requirement Reference:	The unit of certification does not use open fire for waste disposal.		
Objective Evidence:	<p>During the site visit to the staff housing complex at Block H and Class F14, the auditors found the followings lapses:</p> <ol style="list-style-type: none"> 1. Disposal of domestic wastes using fire 2. Empty lubricant containers, empty chemical container, empty paint container, empty mineral water bottles and spillage of engine oil was seen at the residential area. 		
Corrections:	<ol style="list-style-type: none"> 1. Issue a reminder letter to staff who fail to comply with the level of cleanliness and waste management practices set by management. 2. Prepare the schedule of the gotong royong program every month with the involvement of the entire staff housing staff in continuously improving cleanliness. 		

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Root Cause Analysis:	The management of domestic waste and scheduled waste in staff housing areas is less effective because the waste management is managed by employees and families who do not get information and continuing education for awareness of the need to manage the waste more responsibly. There are employees who deliberately do not comply with the instructions of the POM management for the ban on open burning because no serious and firm action will be taken will be imposed.
Corrective Actions:	<ol style="list-style-type: none"> 1. Conduct campaigns and provide education on domestic waste management and scheduled waste by all family members living in staff housing. 2. Install several warning signs of Open Burning Prohibition and Scheduled Waste Disposal in the staff housing area provided.
Assessment Conclusion:	The correction and CAP were accepted. The evidence of effective implementation of the CAP shall be verified in the next assessment.
ASA 3 Verification	<p>During the on-site assessment in FGV Keratong 3 POM and estates, it was found that the operating units adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. Keratong 11 Estate had replanting program spanned over the forthcoming years as shown in 3.1.2. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p> <p>No recurrence of issue found hence confirmed the effectiveness of the CAP. Thus, Minor NC has been closed on 29/11/2021.</p>

Opportunity for Improvement	
OFI#	Description
1992765-202010-I1	<p>OFI Statement: Indicator 3.4.3 The existing of "Pengenalpastian Aspek dan Penilaian Impek" (Identification of Environmental Aspect and Evaluation of Impact) for FGV PMSB Keratong 11 Estate is acceptable and well maintained. Nevertheless, it can be improved through regular review of the aspect and impact activities for each station / area.</p> <p>Verification / Follow-up actions: In addition the mill has initiated the following projects for enhancement to the environmental issues. DOE issued NOTIS ARAHAN on EQA 1974 via letter 28/7/2021 on the following directive;</p> <ol style="list-style-type: none"> a) 01/4/2021 - Effluent pond disludging for 3 units of effluent pond to prevent untreated operation liquid waste mixed inside the monsoon drains. 2 units has been completed in 25/11/21 and 26/10/21 respectively. b) Aug 2021 - ERP on effluent pond overflowing and possible EFB fire hazard following an incidence in neighbouring mill located 30 km. The mill responded requesting completion date on 29/9/21 to DOE for an extension of period from 13/08/21 to 06/10/21 for reason of COVID 19 and other IT facilities e.g drone. <p>Further to this letter the mill requested via another letter dated 29/9/21 on the advice of the progress on the work compliance I.e RM 61K has been approved to proceed with the 12 units</p>

	<p>effluent bund increase in width (3m) and height (1m). Tender process has been made through letter dated 02/11/2021 to the Regional office.</p>
<p>1992765-202010-I2</p>	<p>OFI Statement: Indicator 3.6.1 The HIRADC can be further improved by re-evaluating the potential effect/consequence for road accidents and carrying/transporting sharp tools (e.g. harvesting sickle). At the point of assessment, the identified potential effect/consequence was only injury and not fatal.</p> <p>Verification / Follow-up actions: FGV Plantations (M) Sdn. Bhd. launched an Occupational Safety & Health Objectives 2021 “Zero Fatality of Occupational Accident” signed by Mohd. Sarian Md. Sahid (CEO), Date: 2/1/2021 on highest risk of hazard involving field activities as following:</p> <ul style="list-style-type: none"> - Transport of workers and plantation material/yard - Heavy machine work activity - Sharp tool use activity
<p>1992765-202010-I3</p>	<p>OFI Statement: Indicator 6.1.4 Borang Pemeriksaan Kesehatan Pekerja Ladang Tempatan (Health Inspection for Local Workers Form) could be improved as there was a criterion for female to inform if she is pregnant prior the employment.</p> <p>Verification / Follow-up actions: There is no female worker works in mill process and estate operation. Female workers mainly work in the office of mill and estate. No pregnancy test been conducted for job selection. This is confirmed through the interview session with the female workers and reviewed the medical check up report.</p>
<p>1992765-202010-I4</p>	<p>OFI Statement: Indicator 6.2.4 The line site inspection in Keratong 3 POM could be further improved to ensure the actual issue is recorded in the checklist.</p> <p>Verification / Follow-up actions: Linesite inspection was conducted once a week by Workers’ Welfare Officer using the checklist <i>Pemeriksaan Mingguan Kawasan Perumahan Pekerja Asing</i>. Any issues found during the inspection were recorded in the checklist and actions were taken accordingly. Seen the record of inspection from December 2020 to October 2021. The estate has allocated budget to construct new toilet for one of the toilets of workers. Seen the Visa OE which dated 26/11/2021. Site visit to the housing facilities found in satisfactory condition. Supervisor of FGVASSB Keratong 11 has conducted weekly linesite inspection by using <i>Borang Pemeriksaan Asrama Pekerja</i>. The last inspection was carried out on 19/11/2021 and no issue was sighted. Site visit to the housing facilities found in satisfactory condition. Interviewed with workers confirmed that no issue on housing facilities during the time of audit. Keratong 3 POM has carried out weekly linesite inspection by using <i>Senarai Semak Kebersihan Rumah Petugas</i> by Assistant Manager. Latest record was November 2021. No issue was sighted.</p>

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1992765-202010-I5	<p>OFI Statement: Indicator 6.7.1 The method of maintaining the minutes of meeting of the OSH committee at Keratong3 POM can be further improved by ensuring the past 7 years minutes are still in place.</p> <p>Verification / Follow-up actions: H&S responsible person identified as per appointment of Occupational & Safety Committee member as per Letter dated 2/1/2021; Letter ref. # (12) 4028/Ktg.3/840A/QOHSE-2021 for 7 employee representatives; Ref. # (1-11) 4028/Ktg.3/840A/QOHSE-2021 for 7 employer representatives and Letter ref. # (05) HSE/FGVPISB/WILAYAH4; Date: 26/1/2021 for Committee Chairman of Mill Manager. Latest committee meeting date 24/9/2021; Meeting # 3/2021. Previous meeting (2/2021) was conducted on 12/5/2021 and 10/2/2021 (1/2021). Keratong 11 Estate appointment as OSH committee members as per letter (31)483/ESH PSQM/FGVPM/TEMS; Date: 11/1/2021. Accident and emergency procedures as per Emergency Response Plan</p>
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3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1627502-201804-M1	Major	6.1.3	24/05/2018	Closed out on 19/09/2018
1627502-201804-M2	Major	2.1.1	24/05/2018	Closed out on 19/09/2018
1627502-201804-M3	Major	4.6.11	24/05/2018	Closed out on 19/09/2018
1627502-201804-M4	Major	4.7.1	24/05/2018	Closed out on 19/09/2018
1627502-201804-N1	Minor	6.2.3	24/05/2018	Closed out on 05/12/2019
1627502-201804-N2	Minor	6.6.2	24/05/2018	Closed out on 05/12/2019
1627502-201804-N3	Minor	6.10.3	24/05/2018	Closed out on 05/12/2019
1627502-201804-N4	Minor	4.5.2	24/05/2018	Closed out on 05/12/2019
1627502-201804-N5	Minor	5.1.2	24/05/2018	Closed out on 05/12/2019
1627502-201804-N6	Minor	5.1.3	24/05/2018	Closed out on 05/12/2019
1627502-201804-N7	Minor	5.3.3	24/05/2018	Closed out on 05/12/2019
1627502-201804-N8	Minor	2.1.4	24/05/2018	Closed out on 05/12/2019
1627502-201804-N9	Minor	4.7.5	24/05/2018	Closed out on 05/12/2019
RSPO P&C MYNI 2019				
1860788-201911-M1	Critical	2.1.1	05/12/2019	Closed out on 28/02/2020
1860788-201911-M2	Critical	2.3.1	05/12/2019	Closed out on 28/02/2020
1860788-201911-M3	Critical	4.1.1	05/12/2019	Closed out on 28/02/2020
1860788-201911-M4	Critical	3.6.2	05/12/2019	Closed out on 28/02/2020

1860788-201911-M5	Critical	7.5.1	05/12/2019	Closed out on 28/02/2020
1860788-201911-N1	Minor	2.2.2	05/12/2019	Closed out on 03/12/2020
1992765-202010-M1	Critical	3.6.1	03/12/2020	Closed out on 22/02/2021
1992765-202010-M2	Critical	3.8.6	03/12/2020	Closed out on 22/02/2021
1992765-202010-N1	Minor	2.1.2	03/12/2020	Closed out on 29/11/2021
1992765-202010-N2	Minor	2.2.2	03/12/2020	Closed out on 29/11/2021
1992765-202010-N3	Minor	3.3.2	03/12/2020	Closed out on 29/11/2021
1992765-202010-N4	Minor	3.4.2	03/12/2020	Closed out on 29/11/2021
1992765-202010-N5	Minor	7.3.3	03/12/2020	Closed out on 29/11/2021
2134547-202111-N1	Minor	7.3.2	02/12/2021	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 FGVPISB Keratong 3 Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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)
Estate contractor	Estate contractor	Face to face interview
Gender committee representative	Gender committee representative	Face to face interview
FGV workers union representative	Keratong 11 Estate	Face to face interview
Felda settlers representative	Felda Keratong 1	Face to face interview
Foreign workers representative	Keratong 11 Estate	Face to face interview
Sundry shop operator	Felda Keratong D-Mart	Face to face interview

Stakeholders comment	
1	<p>Feedbacks: Female Workers – They informed that they were treated equally without discrimination of gender. They were briefed on the new mother needs implemented by the company. However, there was no new</p>

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	<p>mothers in all the operating units. They informed that there was no sexual harassment or violence case reported.</p> <p>Audit Team Findings: No other issue.</p>
2	<p>Feedbacks: Workers' Representatives – They informed that they were elected by the workers to be the representatives of workers. Meeting was conducted with the management to discuss if there is any issue with the workers. Actions have been taken by management and kept them informed on the status of issue reported. There was no issue raise by the workers during the time of audit.</p> <p>Audit Team Findings: No other issue.</p>
3	<p>Feedbacks: Contractors – They informed that no payment issue with FGV as they paid as per agreed term. They have signed agreement prior to provide service to FGV. One of the contractors informed that some workers needed the overtime work however the shift already far more enough to give the OT to workers.</p> <p>Audit Team Findings: No other issue.</p>
4	<p>Feedbacks: Settlers' Representatives and FFB Suppliers – They informed that they have attended meeting with the mill management to discuss the quality of FFB and other issues. There is no land dispute with FGV reported from the settlers. They understand the complaint procedure. They have good relationships with the management. The payment of sales of FFB was made as per agreed.</p> <p>Audit Team Findings: No other issue.</p>
5	<p>Feedbacks: Sundry shop operator (Felda D-Mart) – owned by Felda settlers cooperative to provide sundry shop services to local communities including FGV employees. No issue in trading deals with FGV employees including foreign workers.</p> <p>Audit Team Findings: No other issue.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not applicable as the estates have undergone 2nd cycle of replanting.					

Previous land owner / user comment	
Nil	<p>Feedbacks: N/A</p> <p>Audit Team verification and response: N/A</p>

3.5 Impartiality and conflict of interest

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

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 FGV Palm Industries Sdn Bhd Keratong 3 Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that FGV Palm Industries Sdn Bhd Keratong 3 Palm Oil Mill is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Hafriazhar Mohd. Mokhtar	Name: NOROLSAIFUL HAZRI BIN HAMID
Company Name: BSI Services Malaysia Sdn. Bhd.	Company Name: FGV HOLDINGS BERHAD
Title: Lead Auditor	Title: SUSTAINABILITY MANAGER
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> 
Date: 11/3/2022	Date: 18 MARCH. 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. - Critical (Major) compliance -</p> <p>FGV has established SOP for information request from relevant stakeholders and documented in '<i>Komunikasi, Penglibatan dan Rundingan</i>' with Doc. No.: FGV/ML-1A/L2-Pr12 dated 01/06/2016. The objective of the SOP is to establish an effective system for communication between company and stakeholder.</p> <p>List of documents that made available upon request are as below:</p> <ol style="list-style-type: none"> 1. Minutes meeting 2. Complaint report 3. Land title 4. Safety and Health Plan 5. HCV report 6. Stakeholder list 7. SEIA assessment report and management plan 8. Policies 9. And etc <p>Keratong 3 POM has issued memo dated 02/01/2021 and displayed at the notice boards in the mill's premise and linesite to inform stakeholders regarding the publicly available documents that could be access by them.</p> <p>Management of Keratong 3 have provided a memo to all stakeholders dated 11/01/2021 stating all the publicly available</p>	Complied

		documents in the estate, undersigned by the estate manager which was available for verification	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Information provided in both English and Bahasa Malaysia and accessible to all stakeholders in FGV Keratong 3 Certification Unit upon request. Policies & guidelines were available in the company's website: https://www.fgvholdings.com/sustainability/policies-guidelines/ .	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	FGV Keratong 11 Estate has implemented <i>Makluman dan Maklumbalas</i> and conducted briefing to the stakeholders on the publicly available document that could be requested, prevention of fire usage and complaint procedure on 01/11/2021. Seen the record of briefing and requests including following: - Latest DOSH Visit for Mill Machinery and Boiler Inspection date: 5/3/2021; By: Azenida Binti Jantan of DOSH Pahang - Latest Electrical Competent Visiting Engineer visit date: 20/11/2021; By: Ir. Ahmad Firdaus of Alka System	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	FGV has established SOP for information request from relevant stakeholders and documented in ' <i>Komunikasi, Penglibatan dan Rundingan</i> ' with Doc. No.: FGV/ML-1A/L2-Pr12 dated 01/06/2016. The objective of the SOP is to establish an effective system for communication between company and stakeholder. Briefing of the procedure was conducted on 26/11/2021 to the workers in FGV Keratong 3 POM and 01/04/2021 in Keratong 11 estate Administrative Executive of FGV Keratong 3 POM has been appointed as Communication and Social Officer to provide information and receive complaints from stakeholder. Role and responsibilities have been outlined in the appointment letter dated 2/1/2021 (04)4028/Ktg3/840A/RSPO/MSPO.	Complied

		There was no physical stakeholder meeting conducted for Y2021 due to outbreak of Covid-19 pandemic. The management of FGV Keratong 3 POM has approached to the stakeholders to brief them on the publicly available document that could be requested, prevention of fire usage and complaint procedure, company's policies on 10/3/2021 in FGV Keratong 3 POM as per Letter (01)4028/ktg.3/840A/RSPO/2021. There was no issue received by the management from stakeholders.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Estate has established List of Stakeholders where details of the stakeholders such as address, contact person and contact numbers are available in the stakeholder list. Date of last update for Keratong 11 Estate on 08/11/2021 and 02/01/2021 in Keratong 3 POM.	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 -	FGV Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020) was developed. The policy has detailing the responsibility and compliance to the policy and FGV's commitment to sustainability. Besides, Code of Business Conduct and Ethics (CoBCE) for Employees (Policy No.: FGV/GHR/POL/039 Rev. 4.0) was established which incorporated various aspect of committing to a code of ethical conduct and integrity and each of the employees need to read through the policy and accepted via online. The Supplier Code of Conduct was available in the company's website (Doc. Version 001.05.2020) which outlined the business ethics& integrity for all the suppliers with FGV Holdings Berhad and all the contractors and suppliers have to sign on the SCOC. Keratong 3 POM has conducted briefing of CoBCE to the workers on 16/3/2021.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Implementation and monitoring of the compliance of the policy was conducted through agreement and the Supplier Code of Conduct (SCOC), Doc. Version 001.05.2020. The contractors signed the	Complied

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		<p>SCOC during the awarding and signed on <i>Surat Perintah Kerja (SPK)</i>. Sampled the SCOC for contractors as below:</p> <ol style="list-style-type: none"> 1. Mohd Nur Aliff Bin Kidam 22/12/2020 2. Tinta Bumi Enterprise dated 1/2/2021 3. Wazer Jaya Enterprise dated 20/11/2020 4. Perniagaan Maju Bera dated 5/8/2020 	
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -</p>	<p>A total of 40 acts and regulations with latest inclusion of applicable requirement of Prevention and Control of Infectious Diseases Act 1988. Keratong 3 POM has received an Order Notice under Section 37, Environmental Quality Act 1974 as per letter ref. # AS:CR31/152/000/038; Date: 28/7/2021 from DOE Pahang Rompin branch to comply with the Compliance Schedule of DOE License on effluent treatment pond maintenance of bunding. Keratong 3 POM has taken action of order and replied to DOE Rompin on 29/9/2021 as per letter ref. # (03)4028/KTG3/870/AM with acceptance on 6/10/2021 and no further action required by DOE.</p> <p>Earlier, Keratong 3 POM was closed on 15-28/8/2021 (KKM Closure Order Notice Serial # 0889; Date: 15/8/2021; KKM Reopen Approval Order Notice Serial # 0021; Date: 28/8/2021) due to COVID-19 positive infection of one employee. Total positive COVID-19 infection involved 2 employees which were fully recovered, and the mill resumed back operation from 27/8/2021. The mill received an Acknowledgement on Company Registration in MITI COVID-19 Intelligent Management System (CIMS) as per letter ref. # O-04625832; Date: 24/11/2021. For Keratong 3 POM, the COVID-19 vaccination rate has achieved 100% as of 13/10/2021.</p>	Complied

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		<p>Compliance of other legal requirements demonstrated by Keratong 3 POM as per sample licenses & permits sighted as following:</p> <ul style="list-style-type: none"> - Mill MPOB License # 500194604000; Licensed activity: Sales & Transport; Product: SPO #; Storage PK, CPO, SPO #; Milling; FFB #; Validity period: 1/4/2021 -31/3/2022 - DOE License # 005103; Date 9/6/2020; Compliance Schedule Ref. # JAS:CHQ.600-3/1/2/23(31); Validity period: 1/7/2021 – 30/6/2022 - Boiler Certificate of Fitness; Reg. # PH PMD 699; Inspection date: 5/3/2021; Due date: 4/6/2022 - JTK Extra Overtime Permit Ref. # BHG.PU/9/134 Jld 37(6); Date: 11/3/2021; Allowed overtime: 130 hours; Validity period: 1/3/2021 – 31/3/2023 - Energy Commission Private Installation License # 2021/01614; Serial # 50513; Capacity limit: 4,000 kW; Validity period: 6/7/2021 -5/7/2022 - Pahang Water and Energy Resources Sdn. Bhd. Water Consumption Approval Certificate; Serial # 0094; Validity period: 1/1/2021 – 31/12/2021; Water source type: Surface water <p>A total of 36 acts applicable in Keratong 11 Estate operation as per legal register updated on 29/3/2021. Sample licenses and permits sighted as following:</p> <ul style="list-style-type: none"> - KPDNHEP Control Goods Permit (Diesel); Ref. # PHG/RPN/045/98 SK(D); Quantity: 10,920 litres; Validity period: 27/7/2021 – 26/7/2024 - MPOB License # 558962002000; Licensed activity: Sale & transport; Product: FFB #; Area: 1196.4 ha; Validity period: 1/3/2021 – 28/2/2022 	
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2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Based on the file E4 – Act; E4.1 – Legal Register sighted List of Legal Register & Compliance; Keratong 3 POM latest updated 15/10/2020.</p> <p>Keratong 3 POM Legal Compliance Person In-Charge is Mr. muhammad Helmi Bin Jaafar as per letter of appointment ref. # (01)4028/Ktg3/840A/RSPO/MSPO; Date: 2/1/2021</p> <p>Keratong 11 Estate Legal Compliance Person In-Charge is Mr. M Kamal Yassin Bin Abdul Rashid as per letter of appointment ref. # (01)RSPO/P5; Date: 11/1/2021</p>	Complied
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Available a map of Keratong 11 Estate showing boundary marking. In the south adjescent to Ladang DSK Far East (Formerly known as Pahang Plantation). In the north adjescent to Hutan Simpang Lesung. A total of 13 Blocks in Keratong 11 Estate. Sampled at Boudary of Hutan Simpan Lesung in Block 3 found electrical fence erected at the bourder and marking with white and red pipe. At Block 4 as sampled a border with Ladang DSK Far East clearly marked with white and red pipe at drainage between both estates.</p>	Complied
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>A list of contracted parties is maintained in the stakeholders list updated on July 2021 for both Keratong 3 POM and Keratong 11 Estate.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>Contract contain specific clauses on meeting applicable legal requirements including FFB suppliers as per sample for Keratong 3 POM FFB purchase agreements as following:</p> <ul style="list-style-type: none"> - Supplier: Bakti Mas Bina Sdn. Bhd.; Agreement # (62) FPISB/FFBPD/8877; Date: 26/10/2018; Supplier Code of Conduct (SCOC) signed date: 2/1/2021; Doc. V 001.05.2020 	Complied

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		<ul style="list-style-type: none"> - Supplier: Seng Highland Fruits Trading; Agreement # (16) FPISB/FFBPD/8762; Date: 26/10/2018; Supplier Code of Conduct (SCOC) signed date: 3/1/2021; Doc. V 001.05.2020 <p>Keratong 11 Estate a per sample FFB purchase agreements as following:</p> <ul style="list-style-type: none"> - Supplier: Sri Bintang Trading; Agreement (SPK) # 5600004026; Date: 16/4/2021; Supplier Code of Conduct (SCOC) signed date: 18/4/2021; Doc. V 001.05.2020 <p>Evidence of legal due diligence of contracted parties available as per SCOC sighted.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>All contracts including FFB supply has been attached with signed Supplier Code of Conduct (SCOC) Doc. # FGV/PROC/NEW/003 which contain clauses disallowing child, forced and trafficked labour as well as a clause for protection of young workers if they are employed.</p>	Complied
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>Sighted list of direct sourced FFB supply to FGVVISB Keratong 3 Palm Oil Mill where mill management managed to obtain the required information from the directly sourced FFB supplier. The information contains details such as following:</p> <ul style="list-style-type: none"> - Source of FFB - Address of plantation/dealer - MPOB license and Validity - Coordinate and size of plantation - Ownership status - Total crop estimation a year despatch to Palm Oil Mill 	Complied

		<p>List of directly source FFB supplier to the Palm Oil Mill as following:</p> <ol style="list-style-type: none"> 1. Organized Smallholders. <ul style="list-style-type: none"> - Felda Keratong 3 - Felda Technoplant Keratong 3 - Felda Keratong 4 - Felda Technoplant Keratong 4 - Felda Keratong 5 - Felda Technoplant Keratong 5 - Felda Keratong 7 - Felda Technoplant Keratong 7 - Felda Keratong 11 2. Dealers <ul style="list-style-type: none"> - Bakti Mas Sdn. Bhd. - Seng Hingland - Eng Huat Latex Concentrate Sdn. Bhd. - Eratudiza Binti Ghazi 	
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 Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>There were 4 indirectly sourced supplier as following:</p> <ul style="list-style-type: none"> - Bakti Mas Sdn. Bhd. - Seng Hingland - Eng Huat Latex Concentrate Sdn. Bhd. - Eratudiza Binti Ghazi 	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>			

<p>3.1.1</p>	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -</p>	<p>Keratong 03 POM and supply base have established and implemented its commitment to a long term sustainability and financial viability through an operating expenditure /capital expenditure planning. The mill has a budget for financial year July-June comprises of the following components;</p> <ul style="list-style-type: none"> a) Crop processed with anticipated extraction ratios including a 5-year forecast. b) Cost components include the following <ul style="list-style-type: none"> i) General charges statement <ul style="list-style-type: none"> - General charges - Cost of supervision/Cost of labour - Cost of other - Cost of RSPO/MSPO & Other Management system ii) Capital expenditure statement <ul style="list-style-type: none"> - Building, utilities, welfare - Plant & machinery - Office equipment - Furniture & fittings - Electrical installation iii) Plant /Mill inclusive of processing /dispatch cost <p>The five years planning horizon 2020/21-2024/25 is available</p> <p>Similarly, Keratong 11 estate possessed a similar budget format. Inclusive is a 5-year budget/forecast financial plan 2021-2025 allocating categories among others;</p> <ul style="list-style-type: none"> a) Crop yielding area b) Mature cost 	<p>Complied</p>
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- c) General charges/upkeep/collection/depreciation
- d) Cost/ha & cost /mt FFB
- e) CAPEX

Separately the cost of immature areas is also shown which among others comprises of the following items;

- a) Labour statement / Allocation of wages / Labour benefit summary
- b) Yield statement oil palm
- c) Summary of vehicle and running schedule / Job allocation for vehicles
- d) Summary of workshop running schedule
- e) Summary of budget
- f) Summary of general charges
- g) CAPEX

The main key areas of the projections are as follows. Figures were excluded for reason of confidentiality.

Keratong Estate	11	2021	2022	2023	2024	2025
Mature Ha		-	-	-	-	-
Immature Ha		-	-	-	-	-
FFB Tons		-	-	-	-	-
Yld/Ha		-	-	-	-	-

		<table border="1"> <tr> <td>Cost FFB (RM/mt)</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Cost (RM/ha)</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> </table> <table border="1"> <tr> <td>Keratong 3 POM</td> <td>2021</td> <td>2022</td> <td>2023</td> <td>2024</td> <td>2025</td> </tr> <tr> <td>Unit Cost RM/CPO</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Operating Cost</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Total Gen Charges</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Grand total</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>FFB (mt)</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>CPO (mt)</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> </table>	Cost FFB (RM/mt)	-	-	-	-	-	Cost (RM/ha)	-	-	-	-	-	Keratong 3 POM	2021	2022	2023	2024	2025	Unit Cost RM/CPO	-	-	-	-	-	Operating Cost	-	-	-	-	-	Total Gen Charges	-	-	-	-	-	Grand total	-	-	-	-	-	FFB (mt)	-	-	-	-	-	CPO (mt)	-	-	-	-	-	
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3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>The replanting programs until 2025 were sighted for the estate. This program is reviewed once a year (latest being Jan 2021 and is incorporated in their annual financial budget. The replanting program until year 2025 is as follows: All figures in ha otherwise stated.</p> <table border="1"> <tr> <td>Estate</td> <td>2021</td> <td>2022</td> <td>2023</td> <td>2024</td> <td>2025</td> </tr> <tr> <td>Keratong 11</td> <td>222.17</td> <td>245.03</td> <td>100.26</td> <td>0</td> <td>0</td> </tr> </table>	Estate	2021	2022	2023	2024	2025	Keratong 11	222.17	245.03	100.26	0	0	Complied																																										
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<p>3.1.3</p>	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -</p>	<p>There were meetings to discuss on issues related to sustainability status and compliance held by the estate and the mill. The minutes of meeting was established for all relevant meeting. Among others the agenda discussed were:</p> <ul style="list-style-type: none"> a) Internal audit findings b) Stakeholders feedback, c) complaint and grievance d) Status of preventive and corrective actions e) Changes that could affect the management system f) Recommendation for improvement <table border="1" data-bbox="1144 751 1910 999"> <thead> <tr> <th></th> <th>Estate/Mill</th> <th>Date of meeting</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Keratong 03 POM</td> <td>02/10/2020</td> <td>14</td> </tr> <tr> <td>2</td> <td>Keratong 03 POM</td> <td>28/10/2021</td> <td>10</td> </tr> <tr> <td>3</td> <td>Keratong 11 Estate</td> <td>12/10/2021</td> <td>13</td> </tr> <tr> <td>4</td> <td>Keratong 11 Estate</td> <td>24/08/2020</td> <td>12</td> </tr> </tbody> </table>		Estate/Mill	Date of meeting	Attendees	1	Keratong 03 POM	02/10/2020	14	2	Keratong 03 POM	28/10/2021	10	3	Keratong 11 Estate	12/10/2021	13	4	Keratong 11 Estate	24/08/2020	12	<p>Complied</p>
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Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.

<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The action plan for continual improvement has been established and implemented by the mill and estate based on considerations of the main social impacts and opportunities. The action included to briefing worker regarding to sexual harassment policy, child labour and Human right policy.</p> <p>The CU has established an improvement plan mainly on environmental and social issues with details as follows. The mill and the estate documented the program in the Capital Expenditure 2021 - 2025 and discussed in the Management Meeting.</p> <table border="1" data-bbox="1151 707 1919 1383"> <thead> <tr> <th colspan="3">Keratong 03 Palm Oil Mill</th> </tr> <tr> <th></th> <th>Projects</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Operation</td> <td>Transfer 1 unit decanter from Triang POM Feb 2022 at RM 30K. Reduce BOD before treatment in ETP.</td> </tr> <tr> <td>2</td> <td>Environmental</td> <td>Expand width and height of Effluent pond bund 12 units completion in Mac 2022 at RM 62K. This is to improve retention with possible overflowing.</td> </tr> <tr> <td>3</td> <td>Environmental</td> <td>Effluent pond desludging 3 units completion in Dec 2021 at RM70K</td> </tr> <tr> <td>4</td> <td>Environmental</td> <td>VORSEP installation in Dec 2018 to improve dust particulate RM 2M</td> </tr> <tr> <td>5</td> <td>Environmental</td> <td>Shredded plant EFB completion in April 2019 at RM 2.2M sold at external buyer</td> </tr> <tr> <td>6</td> <td>Environmental</td> <td>Bio-Polishing Plant in 2022. Reduce BOD in final discharge</td> </tr> <tr> <td>7</td> <td>Environmental</td> <td>Surface aerator in Dec 2021 at RM 20K to reduce BOD final discharge.</td> </tr> </tbody> </table>	Keratong 03 Palm Oil Mill				Projects	Details	1	Operation	Transfer 1 unit decanter from Triang POM Feb 2022 at RM 30K. Reduce BOD before treatment in ETP.	2	Environmental	Expand width and height of Effluent pond bund 12 units completion in Mac 2022 at RM 62K. This is to improve retention with possible overflowing.	3	Environmental	Effluent pond desludging 3 units completion in Dec 2021 at RM70K	4	Environmental	VORSEP installation in Dec 2018 to improve dust particulate RM 2M	5	Environmental	Shredded plant EFB completion in April 2019 at RM 2.2M sold at external buyer	6	Environmental	Bio-Polishing Plant in 2022. Reduce BOD in final discharge	7	Environmental	Surface aerator in Dec 2021 at RM 20K to reduce BOD final discharge.	<p>Complied</p>
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		8	Social	Workers 5 units toilet in processing area Dec 2021 RM 8K
		9	Social	Sports court in housing area in June 21 RM 10k
		10	Social	Annual Raya Celebration for employees
		11	Social	Yasin Reading Ceremony to instil spiritual values among the community.
		12	Social	Farewell Celebration
		13	Social	Children education performance incentive
				<i>Keratong 11 Estate</i>
		1	Environmental	New fertilizer storage RM 120K - 2022
		2	Operation	New garage 4 units for tractor parking RM 27K - 2022
		3	Operation	Multi Grader for road maintenance RM10K - 2022
		4	Operation	Facilitate estate mapping - RM2K - 2022.
		5	Safety	Memastikan kemalangan sifar di dalam ladang tahun 2022
		6	Social	Provision shop construction RM 100K 2022
		7	Social	Provision for eatery shop RM100K - 2022
		8	Social	Water filter RM 5K - Nov 2021
		9	Social	1 unit of HILUX for workers internal transportation RM100K - Jun 2022.
		10	Social	Yasin Reading Ceremony to instil spiritual values among the community.

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>RSPO metrics template for FGV Keratong 3 POM made available for verification found to be consistent with evidence sighted.</p>	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -</p>	<p>The mill processing system is documented in the following documents among others;</p> <ul style="list-style-type: none"> a) The Mill Lestari Processing Manual b) Mill Standard Operating Procedure, c) The Mill Quality Management Manual <p>These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from;</p> <ul style="list-style-type: none"> a) the reception, sterilization, threshing, pressing, b) clarification, depericarping (nut polishing) station, c) effluent, laboratory, workshop, dispatches etc. <p>In addition, there are also manuals available within the industry and MPOB that are used as guidelines.</p>	Complied

		<p>The standard operation procedure SOP for the estate operations is available which is prepared on Group basis. There are levels of the documentation identified as follows;</p> <ul style="list-style-type: none"> a) Manual Ladang Sawit LESTARI on reviewed 1/6/12 Sawit pra matang edisi II seksyen 3 b) Manual Ladang Sawit LESTARI reviewed on 1/6/12 Sawit matang edisi II seksyen 4 c) Manual Ladang Sawit LESTARI 1/6/12 Pembajaan sawit edisi II seksyen 5 d) Prosedur Kerja Selamat e) Manual Kelestarian (Sustainability) <p>Amendments are made should there be requirement to suit the local issues/situation.</p>												
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>The Agronomy and Agricultural Services Department, Sustainability Unit, Plantation Head and relevant Head Office personnel including the Regional Controller inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Other mechanism as described below.</p> <table border="1" data-bbox="1160 1145 1917 1375"> <tr> <td colspan="3">FGV Keratong 11 Estate</td> </tr> <tr> <td></td> <td>Areas</td> <td>Action/Activities</td> </tr> <tr> <td rowspan="3">1</td> <td rowspan="3">Daily</td> <td>Supervision by field staff/Assist/Manager</td> </tr> <tr> <td>Report of daily activities/costings/variation</td> </tr> <tr> <td>WA group - digital supervision</td> </tr> </table>	FGV Keratong 11 Estate				Areas	Action/Activities	1	Daily	Supervision by field staff/Assist/Manager	Report of daily activities/costings/variation	WA group - digital supervision	Complied
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		2	Schedule	Quarterly ESH meeting	
				RC visits on field activities	
				Internal audits by GCAD/SHO	
				Annual EPMC	
				External audit RSPO /MSPO	
				HQ visits / Agronomist visits	
				Zone Head / Regional Controller visits	
			3	Medical /health	Visits by KKM
					Annual medical surveillance.
		Keratong 03 Palm Oil Mill			
		Areas		Action/Activities	
		1	Daily	Supervision by staff/Assist/Manager	
				Report of daily activities/costings/variation	
		2	Schedule	Quarterly ESH meeting	
				Internal audits by GCAD / SHO	
				Region SHO 2x/year visits	
				External audit RSPO /MSPO	
				Zone Head / Regional Controller visit.	
		3	Annual	Annual EPMC	
Medical surveillance					

3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	Both the estate and mill audited maintained all records of monitoring and available for review. There are several levels of records beginning from the field/mill supervisors to executives and the Managers. The Regional Controller (RC) / Zone Head (ZH) are accountable to monitor the estates/mill compliance towards the SOP, budget and productivity among others. Estates / Mill performances are reviewed during the monthly meeting with RC/ZH.	Complied
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	SIA was conducted on Oct 2021(Revision 2) for Keratong 3 POM by the Certification & Due Diligence Sustainability & Environment Department. The methodology of the assessment was through sampling of stakeholders to be interviewed. Positive and negative impacts were identified and incorporated into the Management Plan. There were no new planting in Keratong 11 estate. This is verified through the following document/facts. a) Hectare statement compared to the previous year. b) Interviews with the management c) Field visits and verification. The assessment of both the above was made in Social/Environmental Management Plan 2021 (Pelan Pengurusan (Management Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang/Kilang) among others aimed; a) To assess current condition based on identified potential aspects	Complied

		<p>b) To verify presence of protected & conservation areas that could be significantly affected.</p> <p>c) To assess the social & environmental impact on the affected areas/stakeholders arising from the estate/mill activities.to reduce and control the pollution (negative impacts) and action plan to sustain the environmental impact (positive) has been developed with details in;</p> <ul style="list-style-type: none"> - Jadual 4.1 Rumusan Skor Untuk Impak Negatif Alam Sekitar Paling Ketara - Jadual 4.2, Pelan Pengurusan (Management Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang - Jadual 4.3. Pelan Tindakan (Action Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang Dan Mengawal Pencemaran (Impak Positif) <p>d) To comply with various sustainability certification schemes</p> <p>The activities involved discussion with the estate management, sighting the documentation, observation on sites and surrounding, and interview with stakeholders adjacent to the conversion areas. The assessment covered the aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control. All the above documents were updated accordingly respectively in Jan 2021. These content are reviewed annually for any revision and updates .</p> <p>The Social/Environmental Management Plan (Pelan Pengurusan (Management Plan) Bagi Mengurangkan Impak Alam Sekitar Dari</p>	
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		<p>Aktiviti Ladang/Kilang) for 2021 produced among others includes the following;</p> <ul style="list-style-type: none"> a) Organization information b) Scope of assessment & team c) Methodology assessment timeline, approach and parameters d) SEAI matrix and findings. <p>All sites and the reports were visited and sighted respectively by the auditors in presence of the SCCD, Regional SHO estates and mill personnel.</p>	
3.4.2	<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.</p> <p>- Minor Compliance -</p>	<p>Social Management Plan was developed in Keratong POM on 28/11/2021. The impact/ issue raised during assessment were recorded in the management plan. For eg:</p> <ul style="list-style-type: none"> 1. Impact: The price for food in canteen was not available and fluctuate Actions to be taken: To ensure the canteen put the price Status: verified on 10/1/2021 2. Impact: Process to renew passport and permit slow. Actions to be taken: To submit the passport 2 months before the expiry date. Status: Seen the list of permits FW04830069 that expired on Dec 2021 and the management has submitted to HQ for renewal on 22/11/2021. Seen the Borang Pengesahan Penyambungan Permit/ Penamatan Kontrak TKL. <p>The Social/Environmental Management Plan (Pelan Pengurusan (Management Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang/Kilang) for period 2021 is available for the CU. The plan among others incorporated the objectives, category, action, frequency, person in charge and monitoring period. Among others issues as extracted below:</p>	Complied

		<ul style="list-style-type: none"> a) To ensure compliance to SOP and legal requirement regarding social (appointment of person in charge/committee to handle social matters, communication on policies/SOP on social to relevant stakeholders, monitoring of pay and agreement of workers and contractor’s workers and to maintain housing and facilities provided to workers). b) To contribute to local communities development c) Community and employee alert on the present pandemic Covid -19 d) PPE issuance and compliance for employees e) Domestic waste disposal f) CSR issuance of welfare gifts during festive/pandemic months. g) Enhance understanding on safety guidelines in mill. h) Health awareness among employees. i) Audiometric test awareness among employees. <p>The aspect and impact analysis for all the mill/estate operations are documented on Jan 2021 and revised annually. In the comprehensive report, the study of aspect and impact are aimed to;</p> <ul style="list-style-type: none"> a) Plan to avoid negative impact and to promote positive impacts. b) Reduction disposal of waste taking into consideration of social responsibilities. c) Plan to reduce pollution and release of GHG d) Development and implementations. <p>The aspect and impact covered the following activities/operations among others;</p>	
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1	Poisoning of VOPs/ woodies	7	Vehicle maintenance by contractors																																																																
2	Circle spraying	8	EFB application																																																																
3	Management of empty containers	9	Fertilizer storage /application																																																																
4	Rat baiting	10	Grass slashing																																																																
5	Diesel Reception	11	Chemicals storage																																																																
6	Triple rinsing	12	Grading of FFB																																																																
Keratong 03 Palm Oil Mill																																																																			
	Activities		Activities																																																																
1	Effluent treatment	7	EFB storage																																																																
2	Engine room operations	8	Laboratory																																																																
3	Boiler operations	9	Workshop operations																																																																
4	CPO storage	10	Sterilization																																																																
5	Diesel Reception/storage	11	Chemicals storage																																																																
6	Triple rinsing	12	Scheduled wastes storage																																																																
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>The action plan for continual improvement has been established and implemented by the mill and estate based on considerations of the main social impacts and opportunities. The action included to briefing worker regarding to sexual harassment policy, child labour and Human right policy. The implementation on stakeholder</p>	Complied																																																																

		<p>meeting conducted by Management, there was no physical stakeholder meeting conducted for Y2021 due to outbreak of Covid-19 pandemic. The management of FGV Keratong 3 POM has approached to the stakeholders to brief them on the publicly available document that could be requested, prevention of fire usage and complaint procedure, company's policies on 10/3/2021 in FGV Keratong 3 POM as per Letter (01)4028/ktg.3/840A/RSPO/2021. There was no issue received by the management from stakeholders.</p> <p>The Social/Environmental Action Plan 2021 available for each units were available having information i.e issues, management plan, PIC and time frame. The input are gathered from the meeting minutes among others;</p> <ul style="list-style-type: none"> a) Gender Committee, union b) Safety Meeting, c) Complaint & Request from internal & external stakeholders d) Management meeting at estates/mill and regional level. e) Dialogue during the morning muster. f) Interview approach with employees. <p>In addition the mill has initiated the following projects for enhancement to the environmental issues.</p> <p>DOE issued NOTIS ARAHAN on EQA 1974 via letter 28/7/2021 on the following directive;</p> <ul style="list-style-type: none"> a) 01/4/2021 - Effluent pond disludging for 3 units of effluent pond to prevent untreated operation liquid waste mixed inside the monsoon drains. 2 units has been completed in 25/11/21 and 26/10/21 respectively. b) Aug 2021 - ERP on effluent pond overflowing and possible EFB fire hazard following an incidence in neighbouring mill located 	
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		<p>30 km. The mill responded requesting completion date on 29/9/21 to DOE for an extension of period from 13/08/21 to 06/10/21 for reason of COVID 19 and other IT facilities e.g drone.</p> <p>Further to this letter the mill requested via another letter dated 29/9/21 on the advice of the progress on the work compliance I.e RM 61K has been approved to proceed with the 12 units effluent bund increase in width (3m) and height (1m). Tender process has been made through letter dated 02/11/2021 to the Regional office.</p>	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>FGV has developed <i>Garis Panduan Pengambilan & Perlantikan Pekerja Am G7</i> (Doc No.: 2020/1, Rev. 3 dated 01/05/2020) for the mill of FGV Palm Industries Sdn Bhd. The procedure has explained the process of recruitment of general workers in the mill. Besides, policy for performance management, termination of employment (dated 04/12/2019) and Compensation Policy (dated 01/01/2020) was developed to explain the process of promotion, retirement and termination of employment.</p> <p>In addition, Collective Agreement (Cog. No.: 031/2020) which valid from 01/01/2019 to 31/12/2021 was available to explain the criteria of promotion, retirement, resignation and termination.</p> <p><i>Jabatan Tenaga Kerja</i> FGV has developed a list of Policy and Procedure with the name <i>Senarai Utama Polisi dan SOP Jabatan Tenaga Kerja (JYK). 'Proses Socialisasi & Temuduga'</i> with Doc. No.: FGV/FGVPM-JTK/SOP/003 dated 01/09/2019 for recruitment of foreign workers is part of the procedure.</p> <p>FGV Group has established Guidelines and Procedures for Responsible Recruitment of Foreign Workers dated 27/06/2019 which available in company's website, 12. The procedure is to set a guideline and adopt the principles in Group Sustainability Policy</p>	Complied

		including non-discrimination, respect for human rights and labour rights. The procedure has outlined the whole process starting from recruitment, hiring, employment and post-employment.	
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Advertisement of the job vacancy was sighted, and criteria of the vacancy was outlined in the advertisement. Interviewed with the Assistant Manager and Clerk confirmed that the advertisement will be displayed at the office area and surrounding of FGV settler's such as restaurant and mosque. Records of employment the job such as Application for Employment, photocopy of identification card, medical check-up and offer letter were maintained and available. The last recruitment of new employee was on 26/04/2021 in Keratong 3 POM.	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	OSH plan established as Perancangan Program Tahuhan OSH; Kilang Keratong 3 Tahun 2021 involved the following: <ul style="list-style-type: none"> - OSH Training: HIRADC, Committee training, fire drill, campaign - OSH Program (internal): Chemical register update, workplace inspection, safety committee meeting, first aid kit inspection - OSH Program (external): CHRA, Medical surveillance, audiometric test, LEV test, fire extinguisher service, chemical exposure monitoring - Machinery license & certificate renewal: air compressor, sterilizer, boiler, monorail electric hoist & overhead crane - Employees competency cert. & license renewal : First aider, Authorised Gas Tester & Entry Supervisor (AGTES), Authorised Entrance & Standby Person 	Complied

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Keratong 3 POM as per HIRADC Form # FGV/PUC-OSH/F1.2; Rev. 0; Latest updated 15/2/2021 with additional Assessment specific on issue of EFB Fibre & Shredded Fibre accumulation within mill compound. Mitigation plans and procedures documented and implemented as per determined control from the hazard assessment as well as third party Chemical Health Risk Assessment (CHRA) under the Occupational Safety and Health (Use and Standard of Exposure of Chemicals Hazardous to Health) Regulations 2000; Report ref. # HQ/08/ASS/00/85-2020-003 by Ihsan Sharif Resources for the assessment conducted from 24/6/2020 to 8/7/2020. Based on the CHRA, the recommendations or action to be taken for the assessed work units indicated the following:

Work unit	Recommendation for action to be taken	Status
Lab personnel	Area and personal monitoring for n-hexane by competent hygiene technician at frequency once every six months until assessor satisfied no more monitoring required	Continuous
WWTP/Boiler man	To supply and use organic vapour mask R 95	Continuous
Mechanical Maintenance	Area and personal monitoring for iron oxide by competent hygiene technician	Continuous

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		<p>Keratong 11 Estate Masterlist HIRADC latest revision 2/8/2021. As per HIRADC Form # FGV/FGVPM/F(IMS 1.3 Pind. 1); Date: 15/1/2021</p> <p>For Keratong 11 Estate established as per Borang Pelan Tindakan Cadangan CHRA; Update: 19/11/2021, based on the CHRA, the recommendations or action to be taken for the assessed work units indicated the following:</p> <table border="1" data-bbox="1153 603 1928 959"> <thead> <tr> <th>Work unit</th> <th>Recommendation for action to be taken</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>Spraying</td> <td>- To follow SOP and PPE - Medical surveillance</td> <td>- Ongoing - Latest sent on 12/11/2021</td> </tr> <tr> <td>Manuring</td> <td>To follow SOP and PPE</td> <td>- Ongoing</td> </tr> <tr> <td>Driver</td> <td>To follow SOP and PPE</td> <td>Continuous</td> </tr> <tr> <td>Gardener</td> <td>To follow SOP and PPE</td> <td>Continuous</td> </tr> </tbody> </table> <p>FGV Plantations (M) Sdn. Bhd. launched an Occupational Safety & Health Objectives 2021 "Zero Fatality of Occupational Accident" signed by Mohd. Sarian Md. Sahid (CEO), Date: 2/1/2021 on highest risk of hazard involving field activities as following:</p> <ul style="list-style-type: none"> - Transport of workers and plantation material/yield - Heavy machine work activity - Sharp tool use activity 	Work unit	Recommendation for action to be taken	Status	Spraying	- To follow SOP and PPE - Medical surveillance	- Ongoing - Latest sent on 12/11/2021	Manuring	To follow SOP and PPE	- Ongoing	Driver	To follow SOP and PPE	Continuous	Gardener	To follow SOP and PPE	Continuous	
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3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Monitoring in Keratong 3 POM as per sample records of monitoring including the following:</p> <table border="1" data-bbox="1153 1310 1928 1353"> <thead> <tr> <th>Monitoring</th> <th>Report</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Monitoring	Report	Results				OFI									
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		<p>Audiometric test</p>	<p>Baseline & Annual Audiometric Test Report FGV Palm Industries Sdn. Bhd. Keratong 3 POM; Date Tested: 2/7/2021; By: Specialist Mobile Safety Supplies Sdn. Bhd.</p> <ul style="list-style-type: none"> - Competent person: Dr. Siow Shin Yee; OHD Reg. # HQ/13/DOC/00/330 	<ul style="list-style-type: none"> - Hearing Impairment (HI) case: 1; Action: Redo audiometric test & Refer OHD; Date: 29/10/2021 - Standard Threshold Shift (STS) case: 25; Action: Redo audiometric test; Date: 29/10/2021 	
		<p>Noise risk assessment</p>	<p>FGV Palm Industries Sdn. Bhd. Keratong 3 POM; DOSH # PHK 1087; Report on Initial Noise May 2020; Report # MZ/NRA/KRT3/0520; By: MZ Enviro Testing & Consulting; Date: 14/5/2020</p> <ul style="list-style-type: none"> - Competent Person: Azri Bin Mohamed Ali; DOSH Reg. # HQ/11/PEB/00/116 	<ul style="list-style-type: none"> - Highest noise level: 101.3 – 101.5 dB(A); Source: Turbine 2; Area: Engine 	

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		<p>Fume hood monitoring</p>	<p>Periodic Engineering Control Equipment Report 2021; Ref. # HQ/09/JHII/00/155-2021/KKSK3; By: HITEC IESH Holding (M) Sdn. Bhd.; Date: 23/9/2021</p> <p>- Competent Person: Ts. Mohd. Shairuddin Ab. Rahman; DOSH Reg. # HQ09/JHII/00/155</p>	<p>- Overall adequate LEV system comply with American Conference of Governmental Industrial Hygienist (ACGIH)/ DOSH requirements</p>	
		<p>Laporan Lawatan KKP Kilang KKS Keratong 3</p>	<p>By Mohammad Najib Bin Ishak; DOSH Reg. # HQ/19/SHO/00/02518; SHO Wilayah 4</p>	<p>- 1st visit 25/1/2021</p> <p>- 2nd visit 5/8/2021</p>	
		<p>First aid kit inspection checklist</p>		<p>-</p>	
<p>Keratong 11 Estate HSE Audit Tier 2 Summary of Audit Findings; Date: 23/11/2021 by OSH Officer Muadzam Shah Region Mohd. Saad bin Kamaludin</p> <p>However, monitoring of the effectiveness of the H&S plan to address health and safety risks to people related to use of First Aid Kit for use in estate field operation could be further improve on the kit content availability/usability. Hence, an OFI has been raised on the matter.</p>					
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>					

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3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>FGVPISB Keratong 3 POM and FGVPMSB Keratong 11 Estate has established an annual training programme for the FY 2021 that covers all aspects including policies, best practices, OSH, environment other trainings related to third party.</p>	Complied																								
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Records of training maintained included the samples pesticides & chemical handling as following:</p> <table border="1" data-bbox="1151 692 1899 1091"> <thead> <tr> <th></th> <th>Keratong 11 Estate - Subject</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Company Policies Briefing</td> <td>18/1/21</td> </tr> <tr> <td>2</td> <td>PPE adherence - Spraying</td> <td>09/9/21</td> </tr> <tr> <td>3</td> <td>Fertilizer application</td> <td>16/9/20</td> </tr> <tr> <td>4</td> <td>Chemical spillage ERP</td> <td>28/10/21</td> </tr> <tr> <td>5</td> <td>Chemical spraying</td> <td>27/8/21</td> </tr> <tr> <td>6</td> <td>Replanting</td> <td>16/11/21</td> </tr> <tr> <td>7</td> <td>Spraying P& D</td> <td>27/5/21</td> </tr> </tbody> </table>		Keratong 11 Estate - Subject	Date	1	Company Policies Briefing	18/1/21	2	PPE adherence - Spraying	09/9/21	3	Fertilizer application	16/9/20	4	Chemical spillage ERP	28/10/21	5	Chemical spraying	27/8/21	6	Replanting	16/11/21	7	Spraying P& D	27/5/21	Complied
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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>As per Workers/Contractors Training Records; Form # FPI/L4/QOSHE-5.2 Rev. 0 for Weighbridge Clerk, Norasimah Binti Jasman; Latest training date: 21/10/2021 by SCCD Personnel. Training attended by 8 mill personnel Mill Manager, Assistant Mill Manager, Operation</p>	Complied																								

Criterion 3.8: Supply chain requirement for mills
(note: All supply chain requirements are considered as **Critical (C)**. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)

3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	Not applicable.	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	Keratong 3 Palm Oil Mill receives and process both FFB supplied from Keratong 11 Estate (own supply base) and other third parties. Since the last assessment, it did not receive any certified FFB from any third parties. Roughly, the FFB received from its own supply base is less than 5% from the total FFB received.	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>	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report (see Table 10).	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>	Registration of transaction is done through the utilisation of RSPO Palmtrace. Verification of the RSPO Palmtrace showed that the mill has met all the registration and reporting requirements.	Complied

<p>3.8.5</p>	<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>Complete and updated procedures established by FGV Holdings Berhad's Sustainability Compliance & Certification Department of Group Sustainability Division and documented as Standard Operation Procedure (SOP) RSPO Supply Chain Certification (Keratong 3 POM); SOP # FGV/GSD-SCCD/SOP/007; Ver. 1; Date: 7/1/2021.</p> <p>Records and reports available as per samples sighted including the following:</p> <ul style="list-style-type: none"> - Annual Daily Figure Report as of December 2020; Report # SLT301; Date: 23/11/2021 - Daily Figures ISCC/RSPO/MSPO (FFB, CPO, PK) on 31/10/2021; Report # FPIMP739; Date: 28/11/2021 <p>Identified person in-charge is Mr. Khamis Bin Zaini (Area Quality Supervisor) and Norasimah Binti Jasman (Weighbridge Clerk); as per letter of appointment ref. # (03)4028/Ktg3/840A/RSPO/MSPO; Date: 2/1/2021.</p>	<p>Complied</p>
<p>3.8.6</p>	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management 	<p>Procedure namely SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 was established which covered the internal audit under Sustainability & Environmental Department (SED), FGVH responsibility. The internal audit will be plan annually before CB audit. The internal audit procedure is cross-referred to SOP: FGV/ML-1A-L2-Pr11 issue 1 dated 01.06.2016.</p> <p>Latest internal audit was conducted on 20/9/2021 – 24/9/2021. Findings from internal audit was discussed in the management review meeting conducted on 28/10/2021.</p>	<p>Complied</p>

	review at least annually. The mill shall maintain the internal audit records and reports.		
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>As per records of purchase as following:</p> <p>Certified FFB:</p> <ul style="list-style-type: none"> - Supplier: FGVPK Keratong 11 Estate; Weighbridge ticket # A00040662; Delivery note # 0007302; Lorry # JDX3963; Date: 29/11/2021; Nett weight: 9.72 mt <p>Un-Certified FFB:</p> <ul style="list-style-type: none"> - Supplier: Felda Keratong 5; Weighbridge ticket # A00040659; Delivery note # 0034384; Lorry # CDX6312; Date: 29/11/2021; Nett weight: 1.17 mt - Supplier: Bakti Mas Bina Sdn. Bhd.; Weighbridge ticket # A00040605; Delivery note # 537578; Lorry # AEL9335; Date: 29/11/2021; Nett weight: 1.40 mt 	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> <ol style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; 	<p>Only certified PK sold by Keratong 3 POM while no certified CPO sales since the last audit. Records of sales and deliveries documents were verified following the minimum information for RSPO certified products made available as per samples as following:</p> <p>Certified sales:</p> <ol style="list-style-type: none"> 1) Buyer: FGV Kernel Products Sdn. Bhd.; Address: Lot 149, Kawasan Perindustrian Semambu, 25350 Kuantan, Pahang Seller: Keratong 3 POM; Address: PO Box 21, 26900 Bandar Tun Razak, Pahang Delivery date: 28/10/2021 Palm Kernel Delivery Acknowledgement date: 28/10/2021 	Complied

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	<ul style="list-style-type: none"> 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>Product description: RSPO SCC (MB) Nett weight: 46.14 mt Palm Kernel Delivery Acknowledgement # L00000219 Seller RSPO certificate # RSPO 693213</p> <p>Uncertified sales:</p> <p>1) Buyer: Delima Oil Products Sdn. Bhd.; Address: PLO238, Jalan Timah 1, Kawasan Perindustrian Pasir Gudang, 81700 Pasir Gudang, Johor Seller: Keratong 3 POM; Address: PO Box 21, 26900 Bandar Tun Razak, Pahang Delivery date: 21/11/2021 CPO Delivery Acknowledgement date: 21/11/2021 Product description: CPO Nett weight: 37.82 mt CPO Delivery Acknowledgement # H00001044 Seller RSPO certificate # N/A</p>	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 	<p>No processing outsource activity involved in Keratong 3 POM SCCS except for product transportation only as per sighted Service Agreement; Date: 1/1/2018 between FGV Transport Services Sdn. Bhd. & FGV Palm Industries Sdn. Bhd. and FGV Trading Sdn. Bhd.</p>	Complied

	<p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>		
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.	No processing outsource activity involved in Keratong 3 POM SCCS except for product transportation only as per sighted Service Agreement; Date: 1/1/2018 between FGV Transport Services Sdn. Bhd. & FGV Palm Industries Sdn. Bhd. and FGV Trading Sdn. Bhd.	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.	No processing outsource activity involved in Keratong 3 POM SCCS except for product transportation only as per sighted Service Agreement; Date: 1/1/2018 between FGV Transport Services Sdn. Bhd. & FGV Palm Industries Sdn. Bhd. and FGV Trading Sdn. Bhd.	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>	FGVPISB Keratong Palm Oil Mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements. Procedure namely Mill RSPO SCC (Mass Balance), SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 has defined at least 2 years of retention time for all records and report.	Complied

	<p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>Mass balance recording is done through utilization of "Lembaran Mass Balance" (Mass Balance Sheet). Computerized system in place with the delivery deducted accordingly. Based on verification of Mass Balance Sheet, it was found that the certified CPO and PK were always delivered from positive stock.</p>	
<p>3.8.13</p>	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</p>	<p>Complied</p>
<p>3.8.14</p>	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</p>	<p>Complied</p>
<p>3.8.15</p>	<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>	<p>Not applicable.</p>	<p>Not Applicable</p>

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> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Shipping announcements by the mill were represented by FGV marketing department located at Kuala Lumpur headquarters. The list of announcements made can be accessed in the RSPO PalmTrace.</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>There had been no claim made using RSPO logo & trademark by Keratong POM. Nevertheless, should there be any claim made, the facility's procedure namely SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, Issue 3, rev. 3, will be implemented to comply with this requirement.</p>	Complied
General corporate communications			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>No off-product claim made by Keratong 3 POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.).</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ol style="list-style-type: none"> Display its RSPO membership status Display the RSPO web address (www.rspo.org) State that the member supports the work of the RSPO State the member's history with regard to the RSPO. Use the RSPO trademark to promote its membership of the RSPO. 	<p>Not applicable as no off-product claim made by Keratong 3 POM as to date.</p>	Complied

	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.		
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 Keratong 3 POM as to date.	Complied
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 Keratong 3 POM as to date.	Complied
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 Keratong 3 POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material 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 is 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.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the shipping documents (i.e. weighbridge tickets, delivery order), the name of product/commodity with SCC model (e.g. PK MB) and RSPO certificate number; RSPO 693213.	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	Keratong 3 POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable

	<p>number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</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.	Not applicable as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Not applicable as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Not applicable as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not applicable as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Not applicable as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Not applicable as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	Not Applicable

6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Not applicable as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be 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 .	Not applicable as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Oil palm claimed for MB certified contain of 100% CPO or PK MB certified.	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.	Oil palm claimed for MB certified contain of 100% CPO or PK MB certified.	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 the certified material; some or all of it may reside in a product that does not carry a claim. The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. 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. 	<p>As at to date, no RSPO trademark used by Keratong 3 POM.</p>	<p>Not Applicable</p>
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. 	<p>As at to date, no RSPO trademark used by Keratong 3 POM.</p>	<p>Not Applicable</p>

	<ul style="list-style-type: none"> 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> <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. 		
<p>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where the company committed to respecting human rights by upholding international human rights principles and standards as encapsulated in the Universal Declaration of Human Rights (UDHR), and other applicable international human rights treaties, subject to the laws and regulations of the countries and territories in which FGV Group operates. In fulfilling its responsibility to respect human rights, FGV Group is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs).</p> <p>Briefing of the policy was conducted on 1/4/2021 in Keratong 11 estate and 04/05/2021 in Keratong 3 POM.</p>	<p>Complied</p>
<p>4.1.2</p>	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>FGV prohibits any form of harassment in their operation as per the policy above. Interviewed with the workers confirmed that no harassment by the management.</p>	<p>Complied</p>

Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>FGV has established SOP for "<i>Menangani Aduan dan Rugutan</i>" with Doc. No.: FGV/ML-1A/L2-Pr13 dated 01/04/2019. The procedure is to provide a system for the internal and external stakeholders to lodge complaint and grievances to the management.</p> <p>The complaints will be solved in 14 days (first stage), 14 days (second stage). The complaint has to be resolved within 2 months from the date of discussion in third stage if the issue needs to be escalated to <i>Wilayah Office</i>. Any issues that can be resolved within the operating unit, it has to be closed within 14 days.</p> <p>Besides, whistleblowing channel and e-form was available in https://www.fgvholdings.com/whistleblowing/ for the stakeholders to report a grievance.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>FGV has established SOP for "<i>Menangani Aduan dan Rugutan</i>" with Doc. No.: FGV/ML-1A/L2-Pr13 dated 01/04/2019. The procedure is to provide a system for the internal and external stakeholders to lodge complaint and grievances to the management.</p> <p>The complaints will be solved in 14 days (first stage), 14 days (second stage). The complaint has to be resolved within 2 months from the date of discussion in third stage if the issue needs to be escalated to <i>Wilayah Office</i>. Any issues that can be resolved within the operating unit, it has to be closed within 14 days.</p> <p>Besides, grievance reporting channels were published in the company's website, https://www.fgvholdings.com/whistleblowing/. The channels of reporting such as through letter, email, in person or Hotline Toll Free call. The whistleblowing e-form was available in https://www.fgvholdings.com/sustainability/grievance/# for the</p>	Complied

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		stakeholders to report a grievance. Briefing of the procedure was conducted on 1/4/2021 to the workers in Keratong 11 Estate.	
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 -	Complaint and Request Logbook was implemented in FGV keratong 11 Estate while Keratong 3 POM implemented Complaint and Grievance Form to record any complaints. Sampled of internal complaint as below: i. Complaint No.: Felda Keratong 3 – dated 26/06/2021 Issue: Grader post malfunction Status: The management has appointed contractor to carry out the repair work and seen the Work Order dated 8/7/2021 and invoice# INV1040 dated 1/06/2021 SPK:3301488122. The worker has acknowledged after the work has been completed. ii. Complaint No; Felda Keratong 11 estate, dated 3/07/2021 Issue: Cannot use Futsal area due to damage Status: The management has taken action to rebuild the futsal area on 27/7/2021	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	As per SOP for Complaint & Grievance (Doc no: FGV/ML-1A/L2-Pr13 issue 01, revision 02 dated 01/04/2019, under clause 7.1.4 (4 th stages) 7.1.4.1 if there is no agreement after complaint lodges to the headquarters, the complaint can be escalated to <i>Jabatan Perhubungan Perusahaan, Kementerian Sumber Manusia</i> or <i>Panel Aduan Persijilan Kelestarian</i> (RSPO or MSPO) as a solution.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			

4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Keratong 3 POM has made contribution to the local communities such as provide transportation upon request. Besides, interviewed with the school's representative confirmed that the management actively participated the school activities such as the management allows the workers (parents) to attend the meeting organized by the school. The mill provided food basket to all the workers that worth RM 50 during Quarantine for Covid 19 issue. Seen the letter (04)4028/Krtg.3/840A/Sumbangan dated 18/8/2021. Seen the record of recipients of the food baskets.</p>	Complied
<p>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.</p>			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>There is no customary right in Keratong POM as the land is belong to FGV Palm Industries Sdn Bhd. This has verified through the land title # 3693, Lot No.: PT 8122 for the usage of palm oil factory.</p> <p>Keratong 11 Estate was leased to FGV for Oil Palm Plantation activities from FELDA. Tenancy Agreement dated 06/01/2012 and 21/01/2012 which commenced on 01/01/2012 between FELDA and FGV and the agreement will further renew every 3 years up to total 99 years was sighted for Keratong 11 Estate. Seen the land titles as below:</p> <ol style="list-style-type: none"> 1. Land title# 3649, Lot No.: PT 8142, 628.7 ha 2. Land title# 3648, Lot No.: PT 8141, 567.7 ha 	Complied
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>There is no customary right in Keratong POM and Keratong 11 Estate as the land is belong to FGV Palm Industries Sdn Bhd and FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.</p>	Complied
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with</p>	<p>There is no customary right in Keratong POM and Keratong 11 Estate as the land is belong to FGV Palm Industries Sdn Bhd and</p>	Complied

	<p>particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.</p>	
4.4.2b	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no customary right in Keratong POM and Keratong 11 Estate as the land is belong to FGV Palm Industries Sdn Bhd and FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.</p>	Complied
4.4.2c	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no customary right in Keratong POM and Keratong 11 Estate as the land is belong to FGV Palm Industries Sdn Bhd and FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.</p>	Complied
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>There is no customary right in Keratong POM and Keratong 11 Estate as the land is belong to FGV Palm Industries Sdn Bhd and FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>There is no customary right in Keratong POM and Keratong 11 Estate as the land is belong to FGV Palm Industries Sdn Bhd and FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.</p>	Complied

4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>There is no customary right in Keratong POM and Keratong 11 Estate as the land is belong to FGV Palm Industries Sdn Bhd and FELDA. The estate’s land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>There is no customary right in Keratong POM and Keratong 11 Estate as the land is belong to FGV Palm Industries Sdn Bhd and FELDA. The estate’s land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.</p>	Complied
<p>Criterion 4.5: No new plantings are established on local peoples’ land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>There was no new planting in FGV Keratong 11 Estate and Keratong 3 POM. There was no acquisition of new land sighted.</p>	Complied
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities’ own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>There was no new planting in FGV Keratong 11 Estate and Keratong 3 POM. There was no acquisition of new land sighted.</p>	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say ‘no’ to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples.</p>	<p>There was no new planting in FGV Keratong 11 Estate and Keratong 3 POM. There was no acquisition of new land sighted.</p>	Complied

	Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -		
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 -	There was no new planting in FGV Keratong 11 Estate and Keratong 3 POM. There was no acquisition of new land sighted.	Complied
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 -	There was no new planting in FGV Keratong 11 Estate and Keratong 3 POM. There was no acquisition of new land sighted.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	There was no new planting in FGV Keratong 11 Estate and Keratong 3 POM. There was no acquisition of new land sighted.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	There was no new planting in FGV Keratong 11 Estate and Keratong 3 POM. There was no acquisition of new land sighted.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There was no new planting in FGV Keratong 11 Estate and Keratong 3 POM. There was no acquisition of new land sighted.	Complied

<p>Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>FGV has developed procedure on "<i>Pengenalpastian dan penyelesaian pertikaian tanah</i>" with Doc. No. ML-1A/L1-Pr10(0) dated 01/06/2016. The objective of the procedure is to handle and monitor issue raised from local communities on customary or user rights. Procedure on the compensation to the people entitled and monitoring of boundary stone was detailing in the procedure. Compensation will be paid according to basic cost/ acre and market land price.</p>	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Refer to Indicator 4.6.1.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities, settlers and other stakeholders reported during the time of audit through interviewed with the local communities. Trenches and fencing were available to demarcate the boundary of land between the neighbouring stakeholders.</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities, settlers and other stakeholders reported during the time of audit through interviewed with the local communities. Trenches and fencing were available to demarcate the boundary of land between the neighbouring stakeholders.</p>	Complied
<p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			

4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -</p>	<p>FGV has developed procedure on "<i>Pengenalpastian dan penyelesaian pertikaian tanah</i>" with Doc. No. ML-1A/L1-Pr10(0) dated 01/06/2016. The objective of the procedure is to handle and monitor issue raised from local communities on customary or user rights. Procedure on the compensation to the people entitled and monitoring of boundary stone was detailing in the procedure. Compensation will be paid according to basic cost/ acre and market land price.</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. - Critical (Major) compliance -</p>	<p>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. - Minor compliance -</p>	<p>There is no customary right land in FGV Keratong 11 Estate. Therefore, the clause is not applicable.</p>	Not Applicable
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -</p>	<p>There is no customary right land in Keratong 11 Estate. Therefore, the clause is not applicable.</p>	Not Applicable
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties</p>	<p>There is no customary right land in Keratong 11 Estate. Therefore, the clause is not applicable.</p>	Not Applicable

	involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -		
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 -	There is no customary right land in Keratong 11 Estate. Therefore, the clause is not applicable.	Not Applicable
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 -	There is no customary right land in Keratong 11 Estate. Therefore, the clause is not applicable.	Not Applicable
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 -	<p>FGV Trading Sdn. Bhd. (FGVTSB) under FFB Purchased Department has established Data Bank online to determine FFB pricing. FFB pricing is based on Malaysian Palm Oil Board (MPOB) published prices updated regularly (daily basis) and displayed at the FGVPISB Keratong 3 Palm Oil Mill weighbridge.</p> <p>FGVPISB Keratong 3 Palm Oil Mill maintains records of FFB prices, including the payment. Sighted the FFB price from January to November 2021 maintained at the office as well as the payment made to the respective smallholder.</p>	Complied

5.1.2	<p>(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	<p>Keratong 3 POM as per minutes of meeting records of <i>Jawatankuasa Permuafakatan, Produktiviti dan Kualiti (JPPK)</i>; Meeting # 5/2021; Date: 5/10/2021; Venue: Wisma JKKR Felda Keratong 3; Attended by Felda Managers, Settlers Head, Regional Controller & Mill Manager.</p>	Complied
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>Contracts are fair, legal and transparent and have agreed timeframe based on the letter of Notification of FFB Purchase Price Offer by FGV Trading (FGVT) Sdn. Bhd.; Notification # (44) FGVTSB/ FFBPD/ HQ/01; Date: 11/3/2021.</p> <p>Notification specified 3 FFB pricing categories as following:</p> <ul style="list-style-type: none"> - A: FFB price for supplier with contract between FELDA & FGVT - B: FFB price for external/retail supplier without FGVT contract - C: FFB price for supplier with contract between FGVPM/FAS/ External FFB & FGVT. <p>All pricing categories calculation are based on regional MPOB daily FFB price, FFB grading & OER %.</p>	Complied
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence available as per Keratong 3 POM minutes of meeting records of <i>Jawatankuasa Permuafakatan, Produktiviti dan Kualiti (JPPK)</i>; Meeting # 5/2021; Date: 5/10/2021; Venue: Wisma JKKR Felda Keratong 3; Attended by Felda Managers, Settlers Head, Regional Controller & Mill Manager.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Contracts are fair, legal and transparent and have agreed timeframe based on the letter of Notification of FFB Purchase Price Offer by FGV Trading (FGVT) Sdn. Bhd.; Notification # (44) FGVTSB/ FFBPD/ HQ/01; Date: 11/3/2021.</p> <p>Notification specified 3 FFB pricing categories as following:</p>	Complied

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		<ul style="list-style-type: none"> - A: FFB price for supplier with contract between FELDA & FGVT - B: FFB price for external/retail supplier without FGVT contract - C: FFB price for supplier with contract between FGVPM/FAS/ External FFB & FGVT. <p>All pricing categories calculation are based on regional MPOB daily FFB price, FFB grading & OER %.</p>	
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given within 15 days as per sample sighted as following:</p> <ul style="list-style-type: none"> - Supplier: Bakti Mas Bina Sdn. Bhd.; Agreement # (62) FPISB/FFBPD/8877; Date: 26/10/2018; Supplier Code of Conduct (SCOC) signed date: 2/1/2021; Doc. V 001.05.2020 - Supplier: Seng Highland Fruits Trading; Agreement # (16) FPISB/FFBPD/8762; Date: 26/10/2018; Supplier Code of Conduct (SCOC) signed date: 3/1/2021; Doc. V 001.05.2020 	Complied
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Verification of Keratong 3 POM weighbridges as per following:</p> <ul style="list-style-type: none"> - Weighing and Measuring Inspection Report under Weighing and Measuring Regulations, 1981; Report # A 009908; Inspection date: 6/10/2021; Inspection type: Recalibration; Calibration certificate # D 063201; Security sticker # DE18001881; Equipment registration # 00265; Ref. # DMSB/21/C1/ATK/66; Weighbridge brand: Mettler Toledo (Ind 246); Serial # B844688378; Capacity: 50,000kg; Inspection by Teras Integrasi Sdn. Bhd. on behalf of De Metrology Sdn. Bhd. - Form D # 061859 (Weigh and Measure) Verification of Weighing and Measuring; Date: 8/12/2020; Equipment serial # 0021516-68K; Brand: Mettler Toledo; Capacity: 80,000kg; Calibration cert. # C1-ATK 00643; Security sticker # DE 18 001740 	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 -	The Palm Oil Mill certification unit does not deal with the organized smallholders directly but rather with the management agencies such as Felda Technoplant and Felda. FFB suppliers other than the management of Felda and Felda Technoplant are free whether or not to sell their crop to FGVPISB Keratong 3 Palm Oil Mill. Thus no contract agreement necessary.	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	The same grievance mechanism as described in Criteria 4.2 is used. As of the audit date, there were 3 grievance reports received from smallholders which were addressed satisfactorily.	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 -	Addressed in the Smallholder Living Standard Improvement Plan Among the action plans established were: - To provide job opportunity - To continue to purchase the FFB from the smallholders - To contribute in term of supplying EFB and POME as fertilizer - Commitment to sustainable business - To be open in term of discussing and handling issues and grievances	Complied
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	Based on the Smallholder Living Standard Improvement Plan, one of the plans is a commitment to sustainable business which covers the initiative to assist the smallholders in conforming to the RSPO & MSPO standard and complying with the legal requirements. Program of GAP (Good Agriculture Practice) for livelihood is a program to promote sustainability amongst the smallholder to promote better livelihood.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Based on the Smallholder Living Standard Improvement Plan, one of the plans is a commitment to sustainable business which covers	Complied

	- Minor compliance -	the initiative to assist the smallholders in conforming to the RSPO & MSPO standard and complying with the legal requirements.	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	The Felda settlers are having an agreement with other Felda’s management agencies, for example, Felda Technoplant. Therefore, the settlers are considered as scheme smallholders to those agencies but not to FGV. Thus, this indicator does not apply to this certification unit since the settlers are out of their scope.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Review done as per Keratong 3 POM minutes of meeting records of <i>Jawatankuasa Permuafakatan, Produktiviti dan Kualiti (JPPK)</i> ; Meeting # 5/2021; Date: 5/10/2021; Venue: Wisma JKRR Felda Keratong 3; Attended by Felda Managers, Settlers Head, Regional Controller & Mill Manager.	Complied
Principle 6: Respect workers’ rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where no person shall be subjected to any discrimination in employment, including hiring, compensation, advancement, training, disciplinary action, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, gender identity, nationality, political opinion, social group, ethnic origin, reproductive rights or other forms of discrimination. Briefing of the policy was conducted on 1/04/2021 in Keratong 11 Estate.	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 and verified through salary slips shows that there is no discrimination in terms of salary payment especially for similar work scope. FGV has committed that no recruitment fee imposed to foreign workers.	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>Employment procedure was established, and details refer to indicator 3.5.1. Collective Agreement (Cog. No.: 031/2020) which valid from 01/01/2019 to 31/12/2021 has explained the criteria of promotion based on the capability, qualification and performance of interview of the candidates.</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>There is no female worker works in mill process and estate operation. Female workers mainly work in the office of mill and estate. No pregnancy test been conducted for job selection. This is confirmed through the interview session with the female workers and reviewed the medical check up report.</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/ KKD was established in Keratong 3 POM and Keratong 11 Estate.</p> <p>Keratong 3 POM consists of 16 female workers and the meeting was conducted once a year. The last meeting was conducted on 11/01/2021. Meeting minutes was sighted. Company policies and functions of the committee was briefed during the meeting. Needs of new mother was discussed in the meeting. They have established Annual Programme of KKD to increase the side income of the female workers. Interviewed with the female worker in the estate confirmed that no case of sexual harassment and violence reported.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>The female workers employed in FGV are local Malaysian. Female workers employed are generally office staffs. Reviewed payslips in Keratong 11 Estate and Keratong 3 POM 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. This has confirmed through interview with the workers comprises of female and male.</p>	Complied

Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).

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6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>FGV Palm Industries Sdn Bhd has signed a Collective Agreement with <i>Kesatuan Pekerja-pekerja FGV Palm Industries Sdn Bhd Semenanjung</i> which valid from 01/01/2019 to 31/12/2021 (Cog. No.: 031/2020) which valid from 01/01/2019 to 31/12/2021. FGVASSB has developed <i>Manual Panduan Kadar Upah Kerja, Bil 07/2020</i> which effective on 01/02/2020. Details such as promotion, notice period, resignation, annual leave, increment of salary, medical leave, maternity leave and overtime were outlined in the agreement. Sampled total 20 workers agreement for both local and foreign workers in mill and estate are reviewed. The agreements are signed in local language for different nationalities. Interviewed with the workers confirmed that they understood the terms and conditions of employment contracts and pay slips.</p>	Complied
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Sample of total 20 workers agreement are reviewed, and the agreements are signed in their local language for different nationalities. Terms and conditions are clearly outlined in the agreement.</p>	Complied
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Reviewed total 20 payslips of the workers in mill and estate found that the wages of the workers are paid accordingly to the Minimum Wage 2020. Overtime was paid as per Employment Act 1955. Deduction was made accordance to the approval granted by <i>Jabatan Tenaga Kerja Semenanjung Malaysia</i>. Interviewed with the workers confirmed that they were understand on the terms and condition of the employment contract signed by them. They also understand the calculation on the wages and overtime shown in the payslips.</p>	Complied

<p>6.2.4</p>	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>All workers are provided with housing facilities that furnish with sanitation facilities, water supplies, electricity and amenities such as praying facilities. Water and electricity are connected to the national supply and grid. Water is subsidized by the company for RM 4/ person and electricity is subsidized for RM 6/ person. These conditions are stated in the collective agreement. Reviewed the payslips found the workers were paid the subsidized amount accordingly.</p> <p>Linesite inspection was conducted once a week by Workers' Welfare Officer using the checklist <i>Pemeriksaan Mingguan Kawasan Perumahan Pekerja Asing</i>. Any issues found during the inspection were recorded in the checklist and actions were taken accordingly. Seen the record of inspection from December 2020 to October 2021. The estate has allocated budget to construct new toilet for one of the toilets of workers. Seen the Visa OE which dated 26/11/2021. Site visit to the housing facilities found in satisfactory condition.</p> <p>Supervisor of FGVASSB Keratong 11 has conducted weekly linesite inspection by using <i>Borang Pemeriksaan Asrama Pekerja</i>. The last inspection was carried out on 19/11/2021 and no issue was sighted. Site visit to the housing facilities found in satisfactory condition. Interviewed with workers confirmed that no issue on housing facilities during the time of audit.</p> <p>Keratong 3 POM has carried out weekly linesite inspection by using <i>Senarai Semak Kebersihan Rumah Petugas</i> by Assistant Manager. Latest record was November 2021. No issue was sighted.</p>	<p>Complied</p>
<p>6.2.5</p>	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Location of mill and estate was inside the vicinity of FGV Settlers village and access to town is available by public transport. Groceries shops and restaurants are sighted, and the workers are easily access to adequate, sufficient and affordable food. Interviewed with the workers confirmed that they have no issue with the food access.</p>	<p>Complied</p>

<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p>	<p>Keratong 3 Complex has established the prevailing wage calculation to include all the in-kind benefits provided to the workers. Sampled the prevailing wages for benefit of Housing – RM 400 for local workers and RM 150 for foreign workers; Healthcare for local workers is RM 96.40 and RM 23.45 for foreign workers. The prevailing wages is more than the Minimum Wage Order 2020.</p>	<p>Complied</p>
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	<p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>There is no casual, temporary and day workers employed in Keratong 3 POM. All the employees are permanent employee. Sorters in POM are the workers of contractor and they are permanent. FFB transporter engaged by the estates was handle by contractor’s own family member and permanent local workers as verified the records of contractors.</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>FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where FGV Group recognises and respects employees’ right to freedom of association and to collective bargaining. Briefing of the policy was conducted on 16/3/2021 in Keratong 11 Estate and 04/05/2021 in Keratong 3 POM.</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</p>	<p>Workers Committee meeting was last conducted on 10/3/2021 in FGV Keratong 3 to discuss welfare issues of the workers. Meeting minutes was available and issues raised were recorded in the meeting minutes. The issues raised were incorporated into the</p>	Complied

	national languages (English and/or Bahasa Malaysia) and made available upon request. - Minor compliance -	social management plan dated 28/11/2021. Interviewed with the workers confirmed that the issues raised were explained by the management.	
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	The workers' representatives in Keratong 11 Estate and Keratong 3 POM were elected by the workers during morning muster. The last election was conducted on 02/01/2019 in Keratong 11 Estate. This has confirmed through interviewed with the workers' representatives.	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where FGV is committed to employing only persons of the age of 18 and above, FGV recognises that Malaysian laws allow for young persons to be engaged in certain forms of employment. Therefore, no person shall be employed under the age of 15, and any employment of young persons shall not be in a manner that is likely to be hazardous, or to interfere with such person's education, or to be harmful to the person's health or physical, mental, spiritual, moral, or social development at any stage of the employment. The contractors have signed on the SCOC where under Clause 3.2 has outlined that they shall not employ child labour under age of 18. Briefing of the policy was conducted on 21/01/2021 in Keratong 11 Estate.	Complied
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -	The contractors have signed on the Supplier Code of Conduct where under Clause 3.2, contractors/ suppliers shall not use child labour who are under age of 18. For recruitment of foreign workers, the main criteria must be within 18 – 45 years old. Before interview for local worker, they are required to submit copy of certificate of education and identification	Complied

		card for age verification and declaration of age is required during the application. Reviewed the master list of employees found that no child labour was employed.	
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	Reviewed the master list in Keratong 3 POM and Keratong 11 estate found that no young person was employed. All the workers are above 18 years old.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	The contractors engaged by the company have briefed and signed on Supplier Code of Conduct (SCOC) as verified accordingly.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where FGV Group shall not tolerate any form of harassment and abuse including physical, sexual, psychological or verbal. Everyone shall be treated with respect and dignity. Briefing of the policy was conducted on 21/01/2021 in Keratong 11 Estate.	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where no person shall be subjected to any discrimination in employment, including hiring, compensation, advancement, training, disciplinary action, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, gender identity, nationality, political opinion, social group, ethnic origin, reproductive rights or other forms of discrimination. Briefing of the policy was conducted on 1/04/2021 in Keratong 11 Estate.	Complied

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6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>There was no new mother identified in Keratong 11 Estate as interviewed with the female staff to confirm. Keratong 11 Estate consists of 4 female workers. However in Keratong 3 POM, needs of new mother was discussed during the Gender Committee/ KKD meeting conducted on 02/01/2021 such as time for breastfeeding and refrigerator to keep the breastmilk.</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>FGV has established 'Menangani Aduan Melalui Jawatankuasa Wanita' with Doc. No.: ML-1A/L2-Pr14 dated 01/06/2016. The objective of the procedure is to establish a mechanism to handle sexual harassment, discrimination, violence cases reported in the area. Channel of complaint lodge has outlined in the procedure such as verbal and written. The appointed committee need to forward the complaint to Regional Gender Committee within 1 week from the date of complain received. If the case is unresolved, the committee will forward the case to <i>Talian Nur (Kementerian Pembangunan Wanita, Keluarga & Masyarakat)</i> through 15999. The management will protect the identity of the complainant if they wish not to reveal. The procedure was briefed to the female workers during Gender Committee/ KKD meeting conducted on 03/03/2021 in Keratong 11 Estate. Interviewed with the female workers confirmed that they are aware of the complaint procedure and informed that there is no case of sexual harassment and violence reported. Reviewed the Complaint Book for Gender Committee in Keratong 11 Estate found no issue has been reported since last audit.</p>	Complied
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p>	<p>FGV will bare all recruitment fees such as medical, transportation from airport to Malaysia, visa as stated in the Communications Pack which will briefed to the candidates during pre-employment process in home country and agreement with the agent in source country;</p>	Complied

	<ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Workers have signed agreement in home country where the terms and conditions are identical without any contract substitution; overtime is based on request of workers and as per FGV's policy, developed Overtime Policy (Policy No.: FGV/GHC/POL/006, Rev. 4 dated 01/01/2020) to comply with the Employment Act 1955; there is no debt and wages withholding through interviewed with the workers; and workers can terminate the contract with 30 days of notice period without any penalty of termination. Interviewed with the foreign workers confirmed that they kept their passport in the safety box provided to them by the management or they kept in the cupboard inside their house. They also informed that overtime is based on voluntarily basis and they have freedom of movement by going to the town to purchase daily groceries.</p>	
<p>6.6.2</p>	<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>FGV Group has developed Guidelines and Procedures for Responsible Recruitment of Foreign Workers dated 27/06/2019. The guidelines are adopted the principles embedded in the Group Sustainability Policy including non-discrimination, respect for human rights and labour rights as well as health and safety. Workers will be signed on the contract of employment and that is non-transferable to other workers and cannot be substituted. The appointed recruitment agent in the source country shall bear all the costs during recruitment process. Workers will undergo orientation program and briefed on their rights, terms and conditions in the contract of employment and relevant labour and immigration laws. All necessities and accommodation will be provided to the workers in accordance with the legal requirements and standards to ensure decent living conditions for workers. As to date, there was no new foreign workers employed by the estates since last audit.</p>	<p>Complied</p>
<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>H&S responsible person identified as per appointment of Occupational & Safety Committee member as per Letter dated 2/1/2021; Letter ref. # (12) 4028/Ktg.3/840A/QOHSE-2021 for 7 employee representatives; Ref. # (1-11) 4028/Ktg.3/840A/QOHSE-2021 for 7 employer representatives and Letter ref. # (05) HSE/FGVPISB/WILAYAH4; Date: 26/1/2021 for Committee Chairman of Mill Manager.</p> <p>Latest committee meeting date 24/9/2021; Meeting # 3/2021. Previous meeting (2/2021) was conducted on 12/5/2021 and 10/2/2021 (1/2021).</p> <p>Keratong 11 Estate appointment as OSH committee members as per letter (31)483/ESH PSQM/FGVPM/TEMS; Date: 11/1/2021.</p> <p>Accident and emergency procedures as per Emergency Response Plan</p>	Complied
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>Keratong 3 POM established the OSH Management Procedure entitled Emergency Action Plan; Doc. # FPI-KTG3-PP-008; Date: 4/2/2020.</p> <p>The procedure contained flow-chart of emergency situation including accident and fire response action plan. sighted too samples of Safe Work Procedure (SWP) as following:</p> <ul style="list-style-type: none"> - SWP # FPI-PK-003; Title: Admin/Weighbridge Station Operation; Rev. 2; Date: 14/7/2010 - SWP # FPI-PK-004(A); Title: Loading Ramp (Top) Operation; Rev. 2; Date: 14/7/2010 	Complied
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for</p>	<p>Keratong 3 POM PPE Received/Replacement Form; Total employee: 83 as per sample as following:</p>	Complied

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<p>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>	Employee & Station	PPE Issued	Date					
	ID # 1212414; Workshop	Leather glove, cotton glove, safety helmet & safety shoe	2/8/2021					
	ID # 1209286; Shredder plant	- Safety helmet & safety shoe - Leather glove	3/6/2021 26/1/2021					
	ID # 1209128; Boiler	- Leather glove, safety shoe & ear plug - Cotton glove	17/2/2020 2/11/2021					
	<p>Keratong 11 Estate: PO # 7000065521/2700094504; Date: 24/6/2019; Items: Mask N95; Supplier: Ironsteel Sdn. Bhd. Seremban; Qty: 300 pcs PPE Matrix FGVP M Keratong 11; Date: 15/10/2021 as signed by OSH Officer FGV Plantation (M) Sdn. Bhd.; DOSH Reg. # HQ/17/SHO/01/01034; Validity period: 6/3/2020 – 5/3/2023; as per sample as following:</p> <table border="1"> <thead> <tr> <th>Activities</th> <th>PPE</th> </tr> </thead> <tbody> <tr> <td>Harvesting</td> <td>Safety helmet, cotton gloves, high-cut rubber boots</td> </tr> <tr> <td>Spraying</td> <td>Safety helmet, safety goggles, respirator with cartridge, nitrile gloves, high-cut rubber boots, apron</td> </tr> </tbody> </table> <p>Records of PPE issuance; FGV/FGVPM/GP/F(PK-25)/1.4 as per sample as following:</p>			Activities	PPE	Harvesting	Safety helmet, cotton gloves, high-cut rubber boots	Spraying
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		Harvester; Date: 23/11/2020: Safety Helmet, Safety shoe; Cotton glove	
6.7.4	All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law. - Minor compliance -	As per Social Security Organisation; Workers Social Security Regulations 1971 Form 8A of workers’ and employer’s contribution on mandatory social security coverage of workers sighted for sample month of February, October and December 2021; Employers Code # A3700034679K.	Complied
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Based on Keratong 3 POM JKPP 8 for 2020; DOSH Ref. # JKPP 8/79381/2020; Date: 24/1/2021, the following were reported: <ul style="list-style-type: none"> - Total fatal case: 0 - Total lost time accident case: 3 - Total lost time: 170 - Total man-days: 199,200.00; Average worker: 83 - Total occupational decease case: 5 - Accident rate: 36.14; Occupational decease: 60.24 - Frequency rate: 15.06 (Accident); 25.10 (Occupational disease) - Severity rate: 853.41 Based on Keratong 11 Estate JKPP 8 for 2020; DOSH Ref. # JKPP 8/72229/2020; Date: 13/1/2021, the following were reported: <ul style="list-style-type: none"> - Total fatal case: 0 - Total lost time accident case: 1 - Total lost time: 27 - Total man-days: 344,448.00; Average worker: 138 - Total occupational decease case: 0 - Accident rate: 7.25; Occupational decease: 0 	Complied

		<ul style="list-style-type: none"> - Frequency rate: 2.90 (Accident); 0 (Occupational disease) - Severity rate: 78.39 	
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>Keratong 11 Estate continued to monitor the Implementation of Integrated Pest Management (IPM) plans.</p> <ul style="list-style-type: none"> a) The estate had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The plan was guided by SOP dated Dec 2016 index no 17.10 beneficial plant protocol. b) In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, along the roadsides and designated points in the fields and also within the nursery perimeter. c) The plan also advocated single layer EFB mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. These monthly detection and observations were carried by staff. d) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year where recommended by the PC /Agronomist. Baiting are continued until bait acceptance threshold level. 	Complied

7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>This is not practiced in the estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM. The estates have declared this compliance in the status of IPM species invasiveness.</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 land preparation in estates by burning ever since FGV practiced zero burning as specified in Item 5.3.6 on NO OPEN BURNING/USE OF FIRE sign by Board of Directors dated 17/11/2020.</p> <p>As advocated, Keratong 11 Estate practiced zero burning. In the replants visited during the audit in the estate, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal.</p>	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Justification of the use of pesticides had been documented. The use of selective products that are specific to the targeted pest, weed or disease had been defined in</p> <ul style="list-style-type: none"> a) Manual Ladang Sawit Lestari <ul style="list-style-type: none"> - Prosedure Kerja Selamat b) Manual Sustainability <ul style="list-style-type: none"> - Prosedur Kerja Selamat - Prosedur membancuh Racun di PREMIX - Pengendalian Bahan Kimia <p>The Manual had included a chemical register list which indicated the purpose of usage (intended target), hazards signage, trade and generic names. The Estate had maintained chemical registers and</p>	Complied

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		<p>were up dated periodically. The registers were updated on Mac 2021. The chemical used in the estate among others as listed below;</p> <table border="1" data-bbox="1144 435 1919 715"> <thead> <tr> <th></th> <th>Chemical name</th> <th>Class</th> <th></th> <th>Chemical name</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Glyphosate iso p/amine</td> <td>III</td> <td>6</td> <td>Cypermethrin</td> <td>III</td> </tr> <tr> <td>2</td> <td>Sodium chlorate</td> <td>III</td> <td>7</td> <td>Tric butoxy ester</td> <td>III</td> </tr> <tr> <td>3</td> <td>Glufosinate ammonium</td> <td>III</td> <td>8</td> <td>Canyon 20G</td> <td>IV</td> </tr> <tr> <td>4</td> <td>Triclopyr butoxy</td> <td>III</td> <td>9</td> <td>Indaziflam</td> <td>III</td> </tr> <tr> <td>5</td> <td>Metsulfuron methy 20%</td> <td>III</td> <td>10</td> <td>Bayfolan</td> <td>III</td> </tr> </tbody> </table> <p>The justification of agrochemicals use is available in the Oil Palm circulars, SOP, and Manual Lestari to justify the usage of certain chemical for respective treatment. The justification is also described in the agronomist report.</p>		Chemical name	Class		Chemical name	Class	1	Glyphosate iso p/amine	III	6	Cypermethrin	III	2	Sodium chlorate	III	7	Tric butoxy ester	III	3	Glufosinate ammonium	III	8	Canyon 20G	IV	4	Triclopyr butoxy	III	9	Indaziflam	III	5	Metsulfuron methy 20%	III	10	Bayfolan	III	
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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. - Critical (Major) compliance -</p>	<p>The estate had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha.</p> <ul style="list-style-type: none"> a) Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available and verified. b) All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II ,class III & class IV pesticides. c) No illegal agrochemicals (stated by local and international laws) in particular paraquat were used in their estates. 	Complied																																				

		Variation of chemical usage are attributed to sizes of immature areas, rainfall pattern and the regeneration growth of weeds in different type of soil series.	
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>Keratong 11 Estate continued to apply pesticides by proven methods that minimise risk and impacts. Application of pesticides was based on and guided by the following documents:</p> <ul style="list-style-type: none"> a) CHRA b) MSDS/SDS supplied by the manufacturer c) OPC Manual d) Safe work procedure Manual <p>However, Keratong 11 Estate - Existence of beneficial plants in the fields visited to support effective ratio of IPM management beneficial plant protocol as per SOP in Manual Lestari could be further improved. Hence an OFI has been raised on the matter.</p>	OFI
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>The estate is committed to minimize the usage of agrochemicals by implementing IPM with the increased in the planting of beneficial plants such as <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i>. Blanket spraying is also not practiced by the estate and soft grasses were maintained in the field. It had also been the practice that insecticides and rat baits are used only after a threshold level has been exceeded as per the</p> <ul style="list-style-type: none"> a) Manual Ladang Sawit Lestari <ul style="list-style-type: none"> - Prosedure Kerja Selamat b) Manual Sustainability <ul style="list-style-type: none"> - Prosedur Kerja Selamat - Prosedur membancuh Racun di PREMIX - Pengendalian Bahan Kimia 	Complied

		The chemicals used for the estate are as provided in the SOP, Manuals and where necessary by the RC/Agronomist during visits.																																					
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>Keratong 11 Estate confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.</p> <ul style="list-style-type: none"> a) The review of the chemical register concluded that all pesticides used were of class II, III & class IV. The use of paraquat had been prohibited in all FGV estates. b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. c) Sighted from records and interviews with workers, staff and estate assistants, concluded that training were held with all precautions being taken and all legal requirements met. Register was updated on 02/01/2021. <p>The chemical used in the estates among others as listed below;</p> <table border="1" data-bbox="1144 970 1921 1251"> <thead> <tr> <th></th> <th>Chemical name</th> <th>Class</th> <th></th> <th>Chemical name</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Glyphosate iso p/amine</td> <td>III</td> <td>6</td> <td>Cypermethrin</td> <td>III</td> </tr> <tr> <td>2</td> <td>Sodium chlorate</td> <td>III</td> <td>7</td> <td>Tric butoxy ester</td> <td>III</td> </tr> <tr> <td>3</td> <td>Glufosinate ammonium</td> <td>III</td> <td>8</td> <td>Canyon 20G</td> <td>IV</td> </tr> <tr> <td>4</td> <td>Triclopyr butoxy</td> <td>III</td> <td>9</td> <td>Indaziflam</td> <td>III</td> </tr> <tr> <td>5</td> <td>Metsulfuron methy 20%</td> <td>III</td> <td>10</td> <td>Bayfolan</td> <td>III</td> </tr> </tbody> </table>		Chemical name	Class		Chemical name	Class	1	Glyphosate iso p/amine	III	6	Cypermethrin	III	2	Sodium chlorate	III	7	Tric butoxy ester	III	3	Glufosinate ammonium	III	8	Canyon 20G	IV	4	Triclopyr butoxy	III	9	Indaziflam	III	5	Metsulfuron methy 20%	III	10	Bayfolan	III	Complied
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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).</p>	<p>Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the product.</p> <ul style="list-style-type: none"> a) The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had 	Complied																																				

	<p>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>understood the hazards involved and how the chemicals should be handled in a safe method.</p> <p>b) The trade and generic names of the chemicals were made known to the workers through the SDS training. SDS was also displayed at all storage areas as observed during the audit.</p> <p>c) The training included the safety aspects and usage of PPE when handling with pesticides. All workers involved in pesticide application were provided with appropriate PPE and replaced when worn-out. PPE issuance & replacement records were verified by the auditors. Training in relation to pesticides & chemical handling among others as shown below.</p> <table border="1" data-bbox="1160 775 1809 1145"> <thead> <tr> <th></th> <th>Keratong 11 Estate - Subject</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Company Policies Briefing</td> <td>18/1/21</td> </tr> <tr> <td>2</td> <td>PPE adherence - Spraying</td> <td>09/9/21</td> </tr> <tr> <td>3</td> <td>Fertilizer application</td> <td>16/9/20</td> </tr> <tr> <td>4</td> <td>Chemical spillage ERP</td> <td>28/10/21</td> </tr> <tr> <td>5</td> <td>Chemical spraying</td> <td>27/8/21</td> </tr> <tr> <td>6</td> <td>Replanting</td> <td>16/11/21</td> </tr> <tr> <td>7</td> <td>Spraying P& D</td> <td>27/5/21</td> </tr> </tbody> </table>		Keratong 11 Estate - Subject	Date	1	Company Policies Briefing	18/1/21	2	PPE adherence - Spraying	09/9/21	3	Fertilizer application	16/9/20	4	Chemical spillage ERP	28/10/21	5	Chemical spraying	27/8/21	6	Replanting	16/11/21	7	Spraying P& D	27/5/21	
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7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>The chemical stores in the estate were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149).</p> <p>a) Records of purchase, storage and use were maintained.</p> <p>b) All store buildings were equipped with exhaust fans with the door secured.</p>	Complied																								

		<p>c) Only authorized personnel are assigned to handle the chemicals.</p> <p>d) All the chemicals were segregated in storage accordingly.</p> <p>Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Disposal are made together with the scheduled waste disposal under SW410.</p>																
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Empty pesticides containers were triple rinsed, holes punched and stored separately in the SW store. Thereafter disposal arrangement will follow accordingly as per procedure in Sustainability Manual procedure ref ML/-1A/L4 2016 and SOP ref HSE/SOP/SW/1. The current practice for both mill (Kualiti Aalam Sdn Bhd) and estate (centralised in Selendang Estate) is delivery as SW 410 to the licensed buyer. No containers being used for other purpose in the estates with the exception that some empty chemical containers were recycled for premixing pesticides for onward delivery to field.</p>	Complied															
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Aerial application of agrochemicals is not practiced in FGV estates in the CU. This is confirmed through observation during the site visit, estate complex and interview with the employees. Such method is no longer in existence in the estates practices.</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>The CHRA for the estate and the mill in Keratong Complex was conducted with details as shown below.</p> <table border="1" data-bbox="1146 1204 1892 1348"> <thead> <tr> <th></th> <th>OU</th> <th>Date</th> <th>Assessor</th> <th>DOSH no</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>KPOM</td> <td>24/7/20</td> <td>Ihsan S Resources</td> <td>HQ/08/ASS/00/85-03</td> </tr> <tr> <td>2</td> <td>K11 E</td> <td>13/2/18</td> <td>Occm. Consultancy</td> <td>JKKP/HIE127/171/(8)</td> </tr> </tbody> </table>		OU	Date	Assessor	DOSH no	1	KPOM	24/7/20	Ihsan S Resources	HQ/08/ASS/00/85-03	2	K11 E	13/2/18	Occm. Consultancy	JKKP/HIE127/171/(8)	Complied
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The recommendation from the CHRA is mainly on the training for operators working in laboratory, ETP, WTP, Boiler, workshop, scheduled waste and chemical store. In addition the assessor recommended medical surveillance be conducted for the categories of employees in the workshop and laboratory and chemicals handlers. Similar CHRA was compiled for the estate with details provided therein. below. The CHRA report among others described requirement of medical surveillance to be made for the listed category of employees.

The mill medical surveillance was performed in Klinik IFZ Medical Supplies Kuantan Pahang for 2020 and 2021 MZ Enviro Testing & Consulting, Kluang Johor. The estate made surveillance at Klinik Segamat Dr Ling Kay Kwong ref no HQ/08/DOC/00/545.

	OU	Employees categories				
		Date	Workshop/store	Lab	Boiler	Electrical
1	KPOM	08/10/21	11/2	6	9	4
2	KPOM	21/10/20	11/1	6	9	3

	OU	Employees categories				
		Date	Mgmt	mandore	sprayers	Driver
1	K11E	12/11/21	4	5	10	1
2	K11E	12/11/20	5	1	12	0

		The results for the entire workers were positive and declared FIT to handle chemicals										
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>Both the estate and mill in the CU complied with procedure and guidelines provided in the Polisi Pengendalian Racun Perosak Bertoksik Tinggi signed by the CEO dated 02.12.2019 whereby no work with pesticides is given to pregnant or breast-feeding women. 'Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan.'</p> <p>The estate maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance. The mill issued letter to all ladies employees on the prohibition of pregnant personnel to handle chemical dated 02/01/2021</p>	Complied									
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.												
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>FGV Keratong 03 Mill and Keratong 11 Estate had identified all wastes and sources of pollution. The Waste Management Action Plan 2021 were established to mitigate and control the identified wastes and source of pollution. The common significant environmental receptors for the estates and mill operations among others as summarized below;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> </tbody> </table>		Receptor	Sources	1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG	2	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down	Complied
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		<table border="1" data-bbox="1137 368 1924 440"> <tr> <td>3</td> <td>Land</td> <td>Scheduled waste, domestic waste and industrial/process waste.</td> </tr> </table> <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2021 reviewed annually. The waste generated from the mill/estates operations as shown below:</p> <table border="1" data-bbox="1162 632 1910 951"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td>2</td> <td>Domestic waste</td> <td>rubbish from the mill/estate complex and employees' quarters</td> </tr> <tr> <td>3</td> <td>Industrial waste</td> <td>Fiber, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td>4</td> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table> <p>The pollution identified from the mill/estate activities:</p> <table border="1" data-bbox="1162 1042 1910 1230"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>Emission from Boilers/vehicles/engines</td> </tr> <tr> <td>2</td> <td>Odor & gases</td> <td>Activities from the effluent treatment</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>Storage & vehicle maintenance</td> </tr> </tbody> </table>	3	Land	Scheduled waste, domestic waste and industrial/process waste.		Type of waste	Details	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	2	Domestic waste	rubbish from the mill/estate complex and employees' quarters	3	Industrial waste	Fiber, palm kernel shell, boiler ash, scrap iron	4	Sewage	Sewage from housing/office complex		Type of waste	Details	1	Black smoke	Emission from Boilers/vehicles/engines	2	Odor & gases	Activities from the effluent treatment	3	Leakage of lubricant	Storage & vehicle maintenance	
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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>FGV POM and the estate had established SOP for chemical handling. The SOP of handling of chemicals is available in the following document</p> <p>i. Manual Ladang Sawit Lestari</p>	<p>Non-compliance</p>																														

		<ul style="list-style-type: none"> - Prosedure Kerja Selamat <p>ii. Manual Sustainability</p> <ul style="list-style-type: none"> - Prosedur Kerja Selamat - Prosedur membancuh Racun di PREMIX - Pengendalian Bahan Kimia - Pengurusan Bahan Buangan <p>a) Management and disposal of waste water 2021 has been established compiled by Assistant Engineer/Assistants/Staff.</p> <p>b) Waste Management Plan 2021 has been established prepared by SCCD and verified by the Assistant Engineer/Assistants/Manager.</p> <p>c) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.</p> <p>d) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is disposed to Kualiti Alam Sdn Bhd registered with DOE.</p> <table border="1" data-bbox="1191 1241 1890 1378"> <thead> <tr> <th>Mill</th> <th>Date</th> <th>SW 305</th> <th>SW 409</th> <th>SW410</th> <th>SW306</th> </tr> </thead> <tbody> <tr> <td>KPOM</td> <td>28/9/20</td> <td>0.640</td> <td>-</td> <td>0.220</td> <td>-</td> </tr> <tr> <td>KPOM</td> <td>30/1/19</td> <td>0.560</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>	Mill	Date	SW 305	SW 409	SW410	SW306	KPOM	28/9/20	0.640	-	0.220	-	KPOM	30/1/19	0.560	-	-	-	
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K11E	18/11/19	0.020	0.110	-	-
K11E	26/11/20	0.028	0.064	-	0.014

Delay in view of change of pricing factor the KPOM retendered SW collection to Pentas Alam Flora Sdn Bhd, Kualiti Alam Sdn Bhd and Lagenda Bumimas Sdn Bhd via letter dated 27/10/21. Date of generation 30/3/2021 for SW 305/SW410 & SW 408 hence the wide interval of disposal.

The estate delivers the SW to a centralized centre at FGV Selendang Estate for onward despatch to Kualiti Alam Sdn Bhd. DOE approval letter dated 30/10/2019 was sighted and verified.

Domestic waste for the operating units in CU was disposed as follows;

Estate	Landfill site	Remarks
KPOM	FELDA Keratong 03	Collection 2/3 x week
KE 11	FGV Blk 06 PM00A	Collection 2/3 x week

The requirement is established and in compliance. The procedure documented under this subject under Perlupusan Sisa Domestik. Document dated 01.06.2016. The procedure has detailed the definition of solid waste. The types of solid wastes has been categorized as follows;

- a) Sisa pepejal komersial / pembinaan
- b) Sisa pepejal isi rumah / perindustrian.
- c) Sisa pepejal keinstitusian
- d) Sisa pepejal import / awam.

		<p>In addition there are `Pelan Pengurusan Domestik Dan Bahan Buangan Tahun 2021. In this plan activities as scheduled are monitored with the date/month recorded. This was sighted and verified. Both landfill sites have signboard displayed and properly demarcated. The area is sufficiently distant from habitation and water contamination. The site disposal area (landfill area) is shown and marked in the estate map.</p> <p>The estate also identified the types of domestic waste;</p> <ul style="list-style-type: none"> a) Sisa baki (Home domestic) b) Sisa pukal e.g. old furnitures, electrical appliances. c) Sisa kitar semula (Recycled). <p>Inside the Management Plan the estate has included among others.</p> <ul style="list-style-type: none"> a) Identification of scheduled waste/ domestic waste. b) Process dispose domestic waste to the estate landfill. <p>The estate also maintained records of source identification source and type of scheduled waste.</p> <p>However, during the site visit to the KPOM mill compound /processing plant it was observed that presence of scrap material/maintenance parts and material were evident without proper storage and segregation. Hence, a Minor NC has been raised on the matter.</p>	
7.3.3	<p>The unit of certification does not use open fire for waste disposal. - Minor compliance -</p>	<p>FGV practices of “Zero open burning” is enforced and elaborated in the Group Sustainability Policy dated 17/11/2020 and also included in the following guidelines;</p> <ul style="list-style-type: none"> a) Manual Ladang Sawit Lestari 	Complied

		<ul style="list-style-type: none"> - Prosedure Kerja Selamat b) Manual Sustainability <ul style="list-style-type: none"> - Prosedur Kerja Selamat - Prosedur membancuh Racun di PREMIX - Pengendalian Bahan Kimia - Penyediaan tanah tanam semula <p>The operating units adhered to the policy of “Zero open burning” for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. Keratong 11 Estate had replanting program spanned over the forthcoming years as shown in 3.1.2. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>The CU continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOP.</p> <ul style="list-style-type: none"> a) FGV Agriculture Manual 1998 <ul style="list-style-type: none"> - Manual Ladang Sawit Lestari - Prosedur Kerja Selamat - Manual Sustainability 2016 - Prosedur Kerja Selamat - Prosedur membancuh Racun di PREMIX 	Complied

		<ul style="list-style-type: none"> - Pengendalian Bahan Kimia b) Pictorial Safety Standards and Security Guidelines (PSS). c) Laboratory Process Control Manual <p>Keratong 03 Palm Oil Mill processing system is documented in the following documents;</p> <ul style="list-style-type: none"> a) Manual Operasi Kilang Sawit introduced on 2/1/01 revised 23/10/17 b) Prosedur Kerja Selamat c) Manual Alam Sekitar EMS d) Laboratory Process Control Manual <p>These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from the reception, sterilisation, threshing, pressing, clarification, depericarping (nut polishing) station, effluent, laboratory, workshop, despatches etc.</p> <p>All the estate and mill operations were guided through the manuals and SOP.</p> <ul style="list-style-type: none"> a) The procedures as documented in the FGV Agriculture Manual were disseminated to the staff/workers through morning briefings and training. b) The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. c) The documents included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis 	
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		<p>and security.</p> <p>d) Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.</p>									
<p>7.4.2</p>	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>The internal Agronomist from FELDA Agriculture Services Sdn Bhd visits estate to perform foliar sampling prior to the fertilizer recommendation for the forthcoming year.</p> <p>a) Leaf and soil nutrient analysis are a common methodology used in the diagnosis of fertilizer requirements in oil palms.</p> <p>b) Foliar analysis reports were then issued to the estates for the program establishment and application. This includes the order of fertilizer and workforce/machine planning.</p> <p>c) For the estate Agronomic assessment and fertilizer recommendation was conducted by Agricultural Agronomic Services Dept to formulate the FY2021 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been were carried out in all estates. The latest being:</p> <table border="1" data-bbox="1249 1139 1809 1235"> <thead> <tr> <th></th> <th><i>Estate</i></th> <th><i>Report Date</i></th> <th><i>Report No</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>K11E</td> <td>29/7/2021</td> <td>FRF20210451</td> </tr> </tbody> </table> <p>d) Soil sampling was carried out accordingly and analysis is made yearly on different fields. The soil analysis provided the</p>		<i>Estate</i>	<i>Report Date</i>	<i>Report No</i>	1	K11E	29/7/2021	FRF20210451	<p>Complied</p>
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		<p>indication of soil health and monitors the changes in the organic carbon and total nitrogen.</p> <p>e) Soil analysis for PH, Org C, Total N, Total P, Avail P, Exchange K, Exchange Ca & Exchange Mg was carried out on a year cycle basis with the recent carried out as follows:</p> <table border="1" data-bbox="1249 579 1809 675"> <thead> <tr> <th></th> <th>Estate</th> <th>Report No</th> <th>Report Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>K11E</td> <td>29/7/2021</td> <td>FRF20210451</td> </tr> </tbody> </table> <p>All foliar and soil sampling & analysis was conducted in FELDA Agricultural Services Sdn Bhd PPTR laboratory.</p>		Estate	Report No	Report Date	1	K11E	29/7/2021	FRF20210451					
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7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>The following practices are applied in the estate in relation to the nutrient recycling strategy;</p> <p>a) EFB application in designated fields at dosage of 20-40 mt/ha applied in inter rows subject to Agronomist recommendations.</p> <p>b) Cut frond are stacked in between the palms rows left to discompose.</p> <table border="1" data-bbox="1249 1082 1908 1177"> <thead> <tr> <th></th> <th>Estate</th> <th>Year</th> <th>Field no</th> <th>Ha</th> <th>Mt</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>K11E</td> <td>2020</td> <td>PR18</td> <td>60.00</td> <td>120</td> </tr> </tbody> </table>		Estate	Year	Field no	Ha	Mt	1	K11E	2020	PR18	60.00	120	Complied
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1	K11E	2020	PR18	60.00	120										
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizer application program was monitored using records i.e. program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc.</p> <p>a) Records of programs and applications of fertilizers were reviewed by the auditors.</p>	Complied												

		<p>b) Review of the records revealed that the actual fertilizers applied in 2020/21 was in line with the program.</p> <p>c) The following fertilizers were applied in the estates on recommendation by the Agronomist FGVAS among others;</p> <table border="1" data-bbox="1249 528 1827 855"> <thead> <tr> <th></th> <th>Fertilizer</th> <th>Kg/palm</th> <th>application month</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>NK27</td> <td>3.0</td> <td>May</td> </tr> <tr> <td>2</td> <td>FPM 10</td> <td>2.50</td> <td>Oct/Nov</td> </tr> <tr> <td>3</td> <td>GML</td> <td>2.00</td> <td>Oct / Nov</td> </tr> <tr> <td>4</td> <td>PMG Mix</td> <td>2.50</td> <td>Sept /Oct</td> </tr> <tr> <td>5</td> <td>MOP</td> <td>1.00</td> <td>Sept/Oct</td> </tr> <tr> <td>6</td> <td>GML</td> <td>1.00</td> <td>Feb</td> </tr> </tbody> </table> <p>The management of soil fertility is guided by FGV's "Manual Ladang Sawit Lestari" (Oil Palm Plantation Sustainability Manual), Third Edition (2017), Section V: Manuring.</p>		Fertilizer	Kg/palm	application month	1	NK27	3.0	May	2	FPM 10	2.50	Oct/Nov	3	GML	2.00	Oct / Nov	4	PMG Mix	2.50	Sept /Oct	5	MOP	1.00	Sept/Oct	6	GML	1.00	Feb	
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<p>Criterion 7.5: Practices minimise and control erosion and degradation of soils.</p>																															
<p>7.5.1</p>	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -</p>	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was available. There were no other problem soils (e.g. podzols and acid sulphate soils) in the estate. The soil map is prepared by Unit Komputer (GPS/GIS) from FELDA Agricultural Services Sdn Bhd (Land Management Unit).</p> <table border="1" data-bbox="1205 1283 1774 1375"> <thead> <tr> <th></th> <th>Soil type</th> <th>%</th> <th></th> <th>Soil type</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Beserah</td> <td>8</td> <td>5</td> <td>Jempol</td> <td>4</td> </tr> </tbody> </table>		Soil type	%		Soil type	%	1	Beserah	8	5	Jempol	4	<p>Complied</p>																
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			2	Bungor	25	6	Kedah	7		
			3	Colluvium	13	7	Malacca	3		
			4	Bungor BGR	30	-	Total	100		
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Like all FGV Estates, Keratong 11 Estate visited continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by a Policy is available titled as 'Polisi Perlindungan Dan Penjagaan Alam Sekitar' signed by Pengarah Besar on 15.4.2016. The content of the Policy among others includes the following;</p> <ul style="list-style-type: none"> a) Compliance with all related guidelines and regulatory laws. b) Implementation of GAP as stated in FELDA Lestari. c) Implement suitable remedial to reduce impact to the environment. d) To avoid pollution <p>Other guidelines were also shown in the following documents among others;</p> <ul style="list-style-type: none"> a) Slope & River Protection Policy in Section 1A/L3 FGV Sustainability Manual b) Buffer Zone & 25-degree slope in Section 1A/L3 FGV Sustainability Manual c) Land Preparation for Terracing in Section 1A/L2 FGV Sustainability Manual. <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of</p>	Complied							

		fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in the interlines. Cover crops were planted in the replants and in certain mature areas. The cover crop <i>mucuna bracteata</i> had been planted along crucial slopes by management. Large areas with <i>neprolepis biserrata</i> in the inter rows were sighted during the visit. The slope maps were provided by the FELDA Agricultural Services Sdn Bhd) providing the terrain classification. Most of the fields visited are at category of 12-20 degree. There were areas with 13-25 degrees and above 25 degree. The latter category was shown in signage at site and remained non-planted with OP. The estate is presently updating the terrain details to provide the ha coverage.	
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	This compliance being addressed in the Sustainable Policy - "Slope and River Protection" signed by the Pengarah Besar dated May 2018 stating the following among others; "Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly".	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 -	Soil surveys are made and available in a soil map for Keratong 11 Estate. Topographic contour map are also available which are both used to manage the drainage and road works in the estate. The estate had no new planting for the current year and also for the forthcoming 5 years operations.	Complied

7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	FGV Group Estates had no planting on areas of more than 25 degree. Plantings on steep slope are either avoided or minimized.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys are made and available in a soil map at the estate. Topographic contour map are also available which are both used to manage the drainage and road works in the estate. Details as per 7.5.1 and 7.5.2.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil in all estate visited. There was also no new planting in the estate	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	There is no peat soil or soil categorized as marginal or fragile soil in all estate visited. There was also no new planting in the estate	Complied
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil in the estate visited. There was also no new planting in the estate.	Complied
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	The water and ground cover management programme is documented in the FGV Agricultural Manual (Water Management in Inland, Costal and Peat lands) issued on 01.07.2011. Details are described in 7.8.1. individual estate and mill had their respective water management plan mainly to monitor among others the following;	Complied

		<ul style="list-style-type: none"> a) Bulk of the supply in view of the location are from PAIP for both mill and estate. b) Monitor the quality of main water inlet/outlet for pollutants from estate's operations. c) Contingency during water shortage. d) Monitor the usage of fresh water on monthly basis e) Reuse/recycle waste water. 	
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil in Keratong 11 Estate visited nor there is no new planting within.	Complied
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil in Keratong 11 Estate visited nor there is no new planting within.	Complied
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas";</p>	There is no peat soil or soil categorized as marginal or fragile soil in Keratong 11 Estate visited nor there is no new planting within.	Complied

	<p>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>												
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>													
<p>7.8.1</p>	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>The mill water management plan has been established with the recent review made on respectively by the OU. Among others the plan therein has emphasized;</p> <p>a) rain water harvesting for cleaning purposes, b) water from the reservoir/catchment for the mill operations c) continual training for workers on water efficiency consumption, d) desilting of water reservoir to retain the reservoir optimal capacity. e) The action plan in event of draught/water pollution.</p> <p>The estates similarly possessed the following water management plan. Among others containing the following initiatives.</p> <table border="1" data-bbox="1137 1155 1912 1315"> <thead> <tr> <th></th> <th>Source</th> <th>Activity</th> <th>Threat</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reservoir/ pond/</td> <td>Chemical mixing</td> <td>Pollution Draught Wastage</td> <td>Enforcement of buffer zone as non-spraying activities.</td> </tr> </tbody> </table>		Source	Activity	Threat	Action Plan	1	Reservoir/ pond/	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer zone as non-spraying activities.	<p>Complied</p>
	Source	Activity	Threat	Action Plan									
1	Reservoir/ pond/	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer zone as non-spraying activities.									

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		2	PAIP/ Rain	General Upkeep	Pollution Draught Wastage	Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.								
		3		Line site	Pollution Draught Wastage	Every house is supplied with containers. Awareness on water usage efficiency. Outsource from neighboring estates.								
		4		Drain upkeep	Interrupti on water flow at drainage system.	Periodic desilting Building of sand bags at specific points to contain water (weirs)								
		5			Water pollution	Prohibit workers from activities at water source Drinking water analysis. Monitor condition of septic tank Adhere SW management procedure to avoid pollution caused by SW.								
		<p>Water Management Plan review date was sighted and verified with records as follows;.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate/Mill</th> <th>Review date</th> <th>Issues</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Keratong 03 POM</td> <td>Jan 2021</td> <td>NIL</td> </tr> </tbody> </table>								Estate/Mill	Review date	Issues	1	Keratong 03 POM
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		<p>The Mill Identification & Management of Waste Water 2021 among others as summarized below;</p> <table border="1"> <thead> <tr> <th data-bbox="1137 523 1173 627"></th> <th data-bbox="1173 523 1294 627">location</th> <th data-bbox="1294 523 1568 627">Waste water produced</th> <th data-bbox="1568 523 1736 627">Treatment/containment</th> <th data-bbox="1736 523 1908 627">Reuse/recycle/disposal method</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 627 1173 874">1</td> <td data-bbox="1173 627 1294 874">Processing stations</td> <td data-bbox="1294 627 1568 874">Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water</td> <td data-bbox="1568 627 1736 874">Oil recovery/ETP</td> <td data-bbox="1736 627 1908 874">Recover into system</td> </tr> <tr> <td data-bbox="1137 874 1173 949">2</td> <td data-bbox="1173 874 1294 949">Boiler</td> <td data-bbox="1294 874 1568 949">Blow down, cleaning water</td> <td data-bbox="1568 874 1736 949">Sludge pit, ETP</td> <td data-bbox="1736 874 1908 949">Monsoon drain</td> </tr> <tr> <td data-bbox="1137 949 1173 1024"></td> <td data-bbox="1173 949 1294 1024">Process ramp</td> <td data-bbox="1294 949 1568 1024">Rainfall runoff</td> <td data-bbox="1568 949 1736 1024">Sedimentation trap</td> <td data-bbox="1736 949 1908 1024">Monsoon drain</td> </tr> <tr> <td data-bbox="1137 1024 1173 1129">3</td> <td data-bbox="1173 1024 1294 1129">Engine room</td> <td data-bbox="1294 1024 1568 1129">Steam condensate, turbine cooling water</td> <td data-bbox="1568 1024 1736 1129">Monsoon drain, recycled tank</td> <td data-bbox="1736 1024 1908 1129">Monsoon drain</td> </tr> <tr> <td data-bbox="1137 1129 1173 1204">4</td> <td data-bbox="1173 1129 1294 1204">Lab</td> <td data-bbox="1294 1129 1568 1204">Cleaning water</td> <td data-bbox="1568 1129 1736 1204">Process drain</td> <td data-bbox="1736 1129 1908 1204">Monsoon drain</td> </tr> <tr> <td data-bbox="1137 1204 1173 1310">5</td> <td data-bbox="1173 1204 1294 1310">Wash room</td> <td data-bbox="1294 1204 1568 1310">Toilet water, cleaning water</td> <td data-bbox="1568 1204 1736 1310">Septic tank</td> <td data-bbox="1736 1204 1908 1310">Collected by licensed contractor.</td> </tr> </tbody> </table>					location	Waste water produced	Treatment/containment	Reuse/recycle/disposal method	1	Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system	2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain		Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain	3	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain	4	Lab	Cleaning water	Process drain	Monsoon drain	5	Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.
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7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO</p>	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at the</p>				Complied																																		

Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.

- Critical (Major) compliance -

estate and mill catchment. Riparian buffer zones have been identified and demarcated. No chemicals and fertilizer application observed been used in their maintenance. In certain areas Guatemala grass / Vertivar sp were planted along the river banks. Guidelines of the width of the rivers and natural courses to be protected have been illustrated in the FGV Sustainability Manual Section 1A/L2 revised dated 01/06/2016. The buffer zones established are as follows:

	River width	Buffer zone
1	>40 meters	50 meters
2	20 - 40 meters	40 meters
3	10 - 20 meters	20 meters
4	5 - 10 meters	10 meters
5	< 5 meters	5 meters

Buffer zones were protected. Areas visited for the estates as tabled below;

	Estate/Mill	Location	Field no
1	Keratong Mill	Sg Keratong	Keratong 05
2	Keratong 11	Sg Kemabai	PM00A/PR18D

Prevention is made especially during the manuring activities. FGV reviewed the environmental performances during the monthly EPMC Environmental Performance Monitoring Committee. Sighted

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minutes of meeting KPOM dated 15/3/2020 and 15/03/2021 among others discussing the following;

- a) Effluent treatment and performance
- b) Scheduled wastes and others waste management
- c) Clean air monitoring
- d) Environmental Programs.

The mill made an annually water samples at 2 points in the river nearby i.e hulu & hilir Sg Keratong. Similar sampling for the estate was made in Sg Kemabai results as shown below. No major issues were noted/recorded.

K 03 POM		21/9/2021		24/11/20		
	Parameter	unit	Hulu	Hilir	Hulu	Hilir
1	PH	-	8.22	7.9	9.71	9.47
2	BOD	mg/L	18	26	24	24
3	COD	mg/L	144	161	0	0
4	T Solids	mg/L	338	326	0	0
5	S Solids	mg/L	123	137	69	76
6	O & G	mg/L	0	0	0	0
7	A Nitrogen	mg/L	3	2	0	0
8	T Nitrogen	mg/L	0	0	0	0
	K11E		18/11/21		14/8/19	

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		Parameter	unit	Hulu	Hilir	Hulu	Hilir																																															
		1 PH	-	5.07	5.44	4.63	Draught																																															
		2 BOD	mg/L	1	1	1	-																																															
		3 COD	mg/L	3	5	5	-																																															
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		5 S Solids	mg/L	22	14	2	-																																															
		8 T Nitrogen	mg/L	0.2	0.1	0.1	-																																															
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 effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily. The mill monitors the effluent and submits to DOE through '<i>Borang Penyata Suku Tahunan</i>'.</p>						Complied																																														
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		<p>Keratong 03 Mill DOE license no 005103 was for water discharge requirement of which is BOD less than 100 mg/l. The mill in the interim has made the following initiative for the BOD reduction among others as stated below.</p> <table border="1" data-bbox="1151 499 1919 983"> <thead> <tr> <th></th> <th>Projects</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Operation</td> <td>Transfer 1 unit decanter form Triang POM Feb 2022 at RM 30K. Reduce BOD before treatment in ETP.</td> </tr> <tr> <td>2</td> <td>Environmental</td> <td>Expand width and height of Effluent pond bund 12 units completion iin Mac 2022 at RM 62K. This is to improve retention with possible overflowing.</td> </tr> <tr> <td>3</td> <td>Environmental</td> <td>Effluent pond desludging 3 units completion in Dec 2021 at RM70K</td> </tr> <tr> <td>4</td> <td>Environmental</td> <td>Bio-Polishing Plant in 2022. Reduce BOD in final discharge</td> </tr> <tr> <td>5</td> <td>Environmental</td> <td>Surface aerator in Dec 2021 at RM 20K to reduce BOD final discharge.</td> </tr> </tbody> </table>		Projects	Details	1	Operation	Transfer 1 unit decanter form Triang POM Feb 2022 at RM 30K. Reduce BOD before treatment in ETP.	2	Environmental	Expand width and height of Effluent pond bund 12 units completion iin Mac 2022 at RM 62K. This is to improve retention with possible overflowing.	3	Environmental	Effluent pond desludging 3 units completion in Dec 2021 at RM70K	4	Environmental	Bio-Polishing Plant in 2022. Reduce BOD in final discharge	5	Environmental	Surface aerator in Dec 2021 at RM 20K to reduce BOD final discharge.			
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording (water usage per mt in 2021 of fresh fruit bunches (FFB) below; Base line is 1.2 ratio</p> <table border="1" data-bbox="1162 1189 1874 1374"> <thead> <tr> <th>No</th> <th>2021</th> <th>Water m3</th> <th>FFB /mt</th> <th>Water /FFB</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jan</td> <td>18050</td> <td>19500</td> <td>0.93</td> </tr> <tr> <td>2</td> <td>Feb</td> <td>14750</td> <td>11240</td> <td>0.96</td> </tr> <tr> <td>3</td> <td>Mac</td> <td>15730</td> <td>16650</td> <td>0.94</td> </tr> </tbody> </table>	No	2021	Water m3	FFB /mt	Water /FFB	1	Jan	18050	19500	0.93	2	Feb	14750	11240	0.96	3	Mac	15730	16650	0.94	Complied
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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>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2021. The document was reviewed/updated on Jan 2021. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Backhoe tractor/ Machines</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel</td> </tr> </tbody> </table>	No	Target	Objective	Action plan	1	Backhoe tractor/ Machines	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel	Complied																											
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2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.
3	Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources

The utilization of fossil fuel in 2021 is being monitored with records shown below: Baseline is 0.70. The mill diesel utilization in 2020 is 90986 liters.

	Keratong Palm Oil Mill 2021			Keratong 11 Estate 2021		
	FFB	Diesel	Diesel/FFB	FFB	Diesel	Diesel/FFB
Jan	19500	10280	0.53	579	4816	8.32
Feb	11240	5660	0.50	515	4613	8.96
Mac	16650	4310	0.26	618	4902	7.92
Apr	22510	7799	0.35	698	5008	7.17
May	22020	5116	0.23	842	4832	5.74
June	25800	6217	0.24	838	4986	5.95
July	18930	6157	0.23	781	4598	5.89
Aug	11740	4270	0.36	755	4633	6.14
Sept	23140	6386	0.28	174	2807	16.12
Oct	16900	7027	0.42	624	5133	8.22

The estate and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running.

Performance variation in view of several factors i.e.

- a) Infrastructure of estates,
- b) Community size / no of gen-sets,
- c) No. of vehicles / age of machine.
- d) Weather interference / crop production volume

There is no opportunity for the estate to capitalize the utilization of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation. The estate adopted the following practices in reducing diesel consumption in the daily operations.

	Management Plan	Timeline	PIC
1	Monitoring of diesel usage in FFB transportation	On-going	AEM
2	Engine OFF when not in operations	On-going	AEM
3	Solar energy - replacement of gen-sets	In plan	AEM
4	Training session to PIC	Oct	AEM

The Mill similarly had a reduction plan of fuel via the following initiative;

	Management Plan	Timeline	PIC
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		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20px; text-align: center;">1</td> <td style="width: 50%;">Monitoring of diesel usage in internal transportation</td> <td style="width: 15%;">On-going</td> <td style="width: 15%;">AEM</td> </tr> <tr> <td style="text-align: center;">2</td> <td>Engine OFF when not in operations</td> <td>On-going</td> <td>AEM</td> </tr> <tr> <td style="text-align: center;">3</td> <td>By maintenance of the boiler & machinery to ensure at optimum level to monitor diesel usage</td> <td>On-going</td> <td>AME</td> </tr> <tr> <td style="text-align: center;">4</td> <td>provide training to workers regarding reduce fuel and diesel usage for boiler.</td> <td>On-going</td> <td>AME</td> </tr> </table> <p>A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2021 identified in the following</p> <ul style="list-style-type: none"> a) Environmental Aspect Identification Summary FY 2021 reviewed accordingly. b) Environmental Impact Evaluation Summary FY 2021 reviewed accordingly. c) Renewable energy usage & diesel consumption 2021 was established and monitored by monthly basis. 	1	Monitoring of diesel usage in internal transportation	On-going	AEM	2	Engine OFF when not in operations	On-going	AEM	3	By maintenance of the boiler & machinery to ensure at optimum level to monitor diesel usage	On-going	AME	4	provide training to workers regarding reduce fuel and diesel usage for boiler.	On-going	AME	
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4	provide training to workers regarding reduce fuel and diesel usage for boiler.	On-going	AME																
<p>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.</p>																			
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>Keratong 03 Palm Oil Mill and Keratong 11 Estate had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <ul style="list-style-type: none"> a) The management from both estate and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment. 	Complied																

		b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.										
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>	The CU has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. The CU records NIL new development within the certified area. There is no new planting in Keratong 11 Estate.	Complied									
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. which covers estate (Latest 20/01/2021) and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1160 1024 1908 1364"> <thead> <tr> <th></th> <th>Environmental Receptors</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> </tbody> </table>		Environmental Receptors	Source	1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).	2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down	Complied
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		<table border="1" data-bbox="1160 363 1908 443"> <tr> <td data-bbox="1160 363 1196 443">3</td> <td data-bbox="1196 363 1384 443">land</td> <td data-bbox="1384 363 1908 443">Land – Scheduled waste, domestic waste and industrial / process waste.</td> </tr> </table> <p data-bbox="1137 497 1921 817">Keratong 03 Palm Oil Mill has conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS during the audit. The system was found to be in functional condition. Data from the stack is connected online to DOE office. Boiler smoke emission data are within the DOE limit. An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent.</p> <p data-bbox="1137 871 1921 995">The Pollution Prevention Plan and Waste Management Action Plan 2021” – is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly. Among others actions taken by the CU were:</p> <ul data-bbox="1137 1008 1921 1161" style="list-style-type: none"> a) Scheduled wastes – disposed to Kualiti Alam Sdn Bhd. b) Domestic wastes are disposed to landfill c) Full compliance to zero burning practices. d) Installation of ESP Vorsep System commissioned in Dec 2018. <p data-bbox="1137 1209 1921 1305">The environmental issues are discussed together in the quarterly ESH meeting 4x/year. The agenda discussed among others as follows;</p> <ul data-bbox="1137 1318 1921 1385" style="list-style-type: none"> a) matters arising b) performance of environment compliance 	3	land	Land – Scheduled waste, domestic waste and industrial / process waste.	
3	land	Land – Scheduled waste, domestic waste and industrial / process waste.				

		<ul style="list-style-type: none"> c) report on environmental pollution d) self-compliance checklist performance e) effluent treatment /clean air / scheduled waste f) audit report on ISO 14001 EMS / RSPO/MSPO g) Domestic waste issues <p>In addition, environmental issues were also discussed direct or indirectly during the management meeting the weekly muster. EPMC dated 24/09/2021 issues discussed the following issues.</p> <ul style="list-style-type: none"> a) Kualiti & Alam Sekitar b) Effluent performance c) Competent person CePSO / CePWaM /CePPOME <p>The estate initiated meeting on environmental dated 23/08/2021.</p>	
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. - Critical (Major) compliance -</p>	<p>There was no land preparation of existence or new planting in FGV Estates by burning ever since the management practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) Manual Ladang Sawit LESTARI on reviewed 1/6/12 b) Sawit pra matang edisi II seksyen 3 c) Manual Ladang Sawit LESTARI reviewed on 1/6/12 d) Sawit matang edisi II seksyen 4 e) Manual Ladang Sawit LESTARI 1/6/12 f) Pembajaan sawit edisi II seksyen 5 	Complied

		<p>g) Prosedur Kerja Selamat h) Manual Kelestarian (Sustainability)</p> <p>As advocated, the estates practiced zero burning. In the replants visited during the audit in the estate, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	
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>	<p>There was no land preparation in Estates by burning ever since FGV practiced zero burning as specified in Item 5.3.6 on NO OPEN BURNING/USE OF FIRE sign by Board of Directors dated 17/11/2020.</p> <p>The estate adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estate. The estate recorded replanting program for the forthcoming 5 years. There is a fire ERP team established by the estate and mill.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>FGV engaged smallholders on the fire prevention and control measures. This was mentioned in the stakeholder meeting of KPOM dated 17/10/2019 under item no B "Nota Pengurus Kilang and letter</p>	Complied

		<p>from the Estate Manager dated 23/10/2020 " elaborating among others the following;</p> <ul style="list-style-type: none"> a. Memelihara dan memulihara kepelbagaian biolog b. Pelan Pengurusan Kebakaram Ladang FGVPM c. Pihak berkepentingan boleh melaporkan kepada FGV d. Jika berlaku kebakaran di persempadanan kawasan ladang/kilang e. Pihak ladang/kilang /pekebun kecil berhampiran juga boleh mendapatkan bantuan daripada FGV jika berlaku di kawasan mereka. <p>There were follow-up on the briefing in relation to fire prevention through stakeholder feedback.</p>	
<p>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.</p>			
<p>7.12.1</p>	<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>	<p>The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest. There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV.</p>	<p>Complied</p>
<p>7.12.2</p>	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p>	<p>The latest assessment was conducted with details as follows; "Laporan Penilaian Konservasi Tinggi (HCV) & Biodiversiti; Ladang FGVPM Keratong 11 dated 27/12/2017. Thereafter being reviewed on 11/10/2021. This report was updated and reviewed by En Amir</p>	<p>Complied</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). - Critical (Major) compliance -</p>	<p>Hamzah Dollah@Abdullah from the Due Diligence Unit, Plantations Sustainability Department.</p> <p>In summary there was no HCV present in the CU except for buffer zone for Sungai Kemabai flowing inlet at P18B and outlet at PR21E. The report details the findings of a rapid appraisal of the biodiversity in the estates and addresses the RSPO P&C relevant to biodiversity conservation and HCV. Therein being provided details relating to the following;</p> <ul style="list-style-type: none"> a) General biodiversity issues b) Watercourses and drainage c) Habitats natural and man-made d) Wildlife e) Ponds and reservoirs f) Wetlands /watercourses g) Legal aspects h) Immediate and long term effect. 	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		Complied
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly</p>	<p>The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest. There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV.</p>	Complied

	<p>managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>		
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>The latest assessment was conducted with details as follows; "Laporan Penilaian Konservasi Tinggi (HCV) & Biodiversiti; Ladang FGVP Keratong 11 dated 27/12/2017. Thereafter being reviewed on 11/10/2021. This report was updated and reviewed by En Amir Hamzah Dollah@Abdullah from the Due Diligence Unit, Plantations Sustainability Department.</p> <p>In summary there was no HCV present in the CU except for buffer zone for Sungai Kemabai flowing inlet at P18B and outlet at PR21E. The report details the findings of a rapid appraisal of the biodiversity in the estates and addresses the RSPO P&C relevant to biodiversity conservation and HCV. Therein being provided details relating to the following;</p> <ul style="list-style-type: none"> i) General biodiversity issues j) Watercourses and drainage k) Habitats natural and man-made l) Wildlife m) Ponds and reservoirs n) Wetlands /watercourses o) Legal aspects p) Immediate and long term effect. 	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to</p>	<p>The audit findings have confirmed that there is no new planting affecting present HCV and primary forest. There was no land</p>	Complied

	<p>regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>clearing activities made nor had damaged any forest to protect or enhance the HCV.</p>	
<p>7.12.7</p>	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The latest assessment was conducted with details as follows; "Laporan Penilaian Konservasi Tinggi (HCV) & Biodiversiti; Ladang FGVPM Keratong 11 dated 27/12/2017. Thereafter being reviewed on 11/10/2021. This report was updated and reviewed by En Amir Hamzah Dollah@Abdullah from the Due Diligence Unit, Plantations Sustainability Department.</p> <p>In summary there was no HCV present in the CU except for buffer zone for Sungai Kemabai flowing inlet at P18B and outlet at PR21E. The report details the findings of a rapid appraisal of the biodiversity in the estates and addresses the RSPO P&C relevant to biodiversity conservation and HCV. Therein being provided details relating to the following;</p> <ul style="list-style-type: none"> q) General biodiversity issues r) Watercourses and drainage s) Habitats natural and man-made t) Wildlife u) Ponds and reservoirs v) Wetlands /watercourses w) Legal aspects x) Immediate and long term effect. 	<p>Complied</p>

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

The GHG emissions that were produced in 2020 for FGV Palm Industries Sdn Bhd Keratong 3 Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2020 for FGV Palm Industries Sdn Bhd Keratong 3 Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.02
PKO	1.02

Extraction	%
OER	20.35
KER	5.00

Production	t/yr
FFB Process	251510.00
CPO Produced	51181.52
PKO Produced	12568.93

Land Use	Ha
OP Planted Area	1016.66
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	1016.66

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	10041.17	1.00	0.00	0.00	0.00	0.00	10041.17	1.00
CO ₂ Emission from fertilizer	533.03	0.05	0.00	0.00	0.00	0.00	533.03	0.05
NO ₂ Emission	363.44	0.04	0.00	0.00	0.00	0.00	363.44	0.04
Fuel Consumption	156.13	0.02	0.00	0.00	0.00	0.00	156.13	0.02
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-6285.19	-0.63	0.00	0.00	0.00	0.00	-6285.19	-0.63
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Total	4808.58	0.48	0.00	0.00	59882.07	0.00	64690.65	0.48
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*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0.00	0.00
Fuel Consumption	283.88	0.00
Grid Electricity Utilization	352.07	0.00
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	635.95	0.00

Summary of Kernel Crusher Emission and Credit (if applicable)

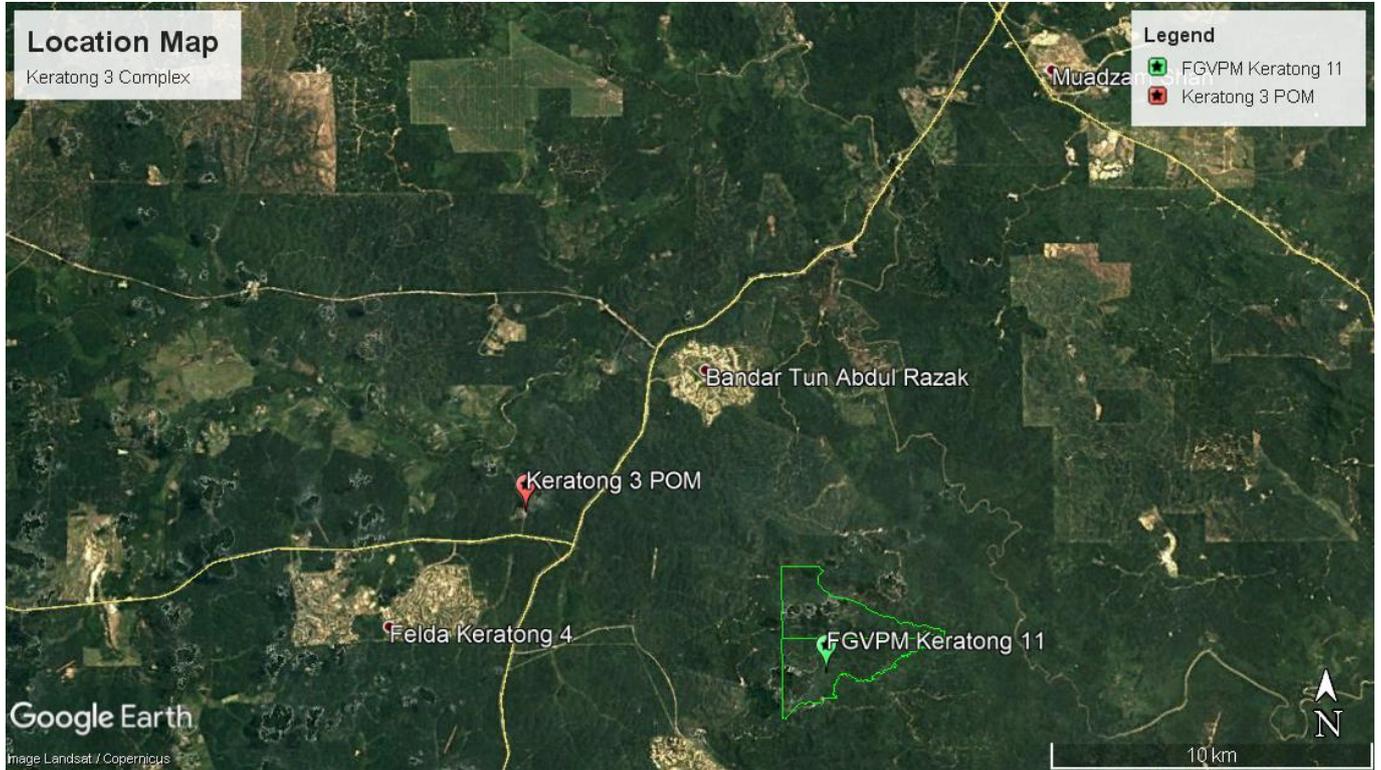
Emissions	tCO ₂ e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

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

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

Appendix C: Location Map of Certification Unit and Supply bases



FGVPISB Keratong 3 POM Location

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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			
Nil	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
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
CU	Certification Unit
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FGVPISB	FGV Palm Industries Sdn. Bhd.
FGVPMSB	FGV Plantation Malaysia Sdn. Bhd.
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure