

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

Client Company name (Parent Company): Genting Plantations Berhad
Client company Address: 10th Floor, Wisma Genting, Jalan Sultan
Certification Unit: Genting Oil Mills (Sabah) Sdn Bhd - Genting Sabapalm Oil Mill Location of Certification Unit: KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia.
Date of Final Report: 28/09/2022

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Genting Plantations Berhad		
RSPO Membership Number	1-0086-06-000-00	Membership Approval Date	1-0086-06-000-00
Address	10 th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia.		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Genting Oil Mills (Sabah) Sdn Bhd - Genting Sabapalm Oil Mill		
Location / Address	KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia.		
Website	www.gentingplantations.com		
Management Representative	Arunan a/l Kandasamy	E-mail	Arunan a/l Kandasamy
Telephone	+603-2333 6510 +603- 7631 922	Facsimile	03- 2333 6575

2. Certification Information			
Certificate Number	RSPO 653477	Certificate Start Date	28/09/2022
Date of First Certification	09/06/2016	Certificate Expiry Date	27/09/2027
Scope of Certification	Palm Oil and Palm Kernel Production		
Visit Objectives	The objective of the assessment is to conduct a recertification audit with additional 50% sampling size to ensure the elements of the scope of registration and the requirements of the management standard are effectively addressed by Sabapalm Oil Mill and Supply Base's management system and the ability of the management system to ensure the organisation meets applicable statutory, regulatory and contractual requirements and as applicable, to identify areas for potential improvement of the management system.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 1) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <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	20Mt/Hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE119-60213799	ISCC EU	ASG Cert GmbH	31/12/2022
MSPO 689068	MS 2530-3:2013 – Part 3	BSI Services (M) Sdn Bhd	03/07/2024
MSPO 689067	MS 2530-4:2013 – Part 4	BSI Services (M) Sdn Bhd	03/07/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Genting Sabapalm Oil Mill	25 Km, Down Sungai Labuk, Mukim Tagas-Tagas, Beluran, Sabah	5° 57' 54.3"N	117° 22' 26.8"E
Genting Sabapalm Estate	Genting Sabapalm Estate, 25 Km, Down Sungai Labuk, Mukim Tagas-Tagas, Beluran, Sabah	5° 57' 54.3"N	117° 22' 26.8"E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Sabapalm Estate	3,947.20	8.91	402.47	4,358.58	91.00
Total	3,947.20	8.91	402.47	4,358.58	91.00

Note: Mature + Immature ha 3,947.20 ha different of 7.03 ha from previous of 3,954.23 due to land acquired for new housing construction and resurvey of replanting area. This resulting the infrastructure and other ha increase to 402.47 from previous ha of 395.40 ha.

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Sabapalm Estate	634.29	629.44	1,770.10	753.00	160.37	3,351.09	596.11
Total (ha)	634.29	629.44	1,770.10	753.00	160.37	3,351.09	596.11

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7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Jun 2020 – May 2021)	Actual (June 2020- Mar 2022)		Forecast (Apr 2022 – Mar 2023)
		Previous license period (Jun 20-May 21)	Current license period (Jun 21- Mar 22)	
Genting Sabapalm Estate	98,545	85,517.31	79,887.02	98,880
Total	98,545	79,887.02		98,880

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Jun 2020 – May 2021)	Actual (June 2020- Mar 2022)		Forecast (Apr 2022 – Mar 2023)
		Previous license period (Jun 20-May 21)	Current license period (Jun 21- Mar 22)	
Nil				
Total		N/A		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Jun 2020 – May 2021)	Actual (June 2020- Mar 2022)		Forecast (Apr 2022 – Mar 2023)
		Previous license period (Jun 20-May 21)	Current license period (Jun 21- Mar 22)	
Independent smallholder	21,665	29,055.95	21,431.01	21,600
Total	21,665	50,486.96		21,600

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	Jun'20	8098.10	2874.15	10972.25
2	Jul'20	8220.49	3018.49	11238.98

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3	Aug'20	6797.48	2736.61	9534.09
4	Sept`20	10,346.74	3585.35	13932.09
5	Oct'20	10,240.28	3114.17	13354.45
6	Nov'20	8152.51	2366.12	10518.63
7	Dec'20	7344.65	2128.81	9473.46
8	Jan'21	4155.27	1865.81	6021.08
9	Feb'21	4276.15	1561.86	5838.01
10	Mar'21	4484.30	1535.55	6019.85
11	Apr'21	5864.43	1996.55	7860.98
12	May 2021	7,536.91	2,272.48	9,809.39
13	June 2021	7,344.39	2,282.85	9,627.24
14	July 2021	7,520.56	2,139.82	9,660.38
15	Aug 2021	11,596.97	2,458.98	14,055.95
16	Sept 2021	9,684.00	2,576.16	12,260.16
17	Oct 2021	11,294.59	2,651.82	13,946.41
18	Nov 2021	8,850.50	2,513.58	11,364.08
19	Dec 2021	7,999.57	1,916.06	9,915.63
20	Jan 2022	4,536.34	1,516.96	6,053.30
21	Feb 2022	5,106.58	1,455.45	6,562.03
22	Mar 2022	5,953.52	1,919.33	7,872.85
TOTAL		165,404.33	50,486.96	215,891.29

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

*Estimated last year (Jun 2020 – May 2021)	Actual (June 2020- Mar 2022)		Forecast (Apr 2022 – Mar 2023)
	Previous license period (Jun 20-May 21)	Current license period (Jun 21- Mar 22)	
FFB	FFB		FFB
159,955 mt	7,536.91 mt	79,887.02 mt	98,888 mt
CPO (OER: 21.71 %)	CPO (OER: 25.95 %)		CPO (OER: 21.00 %)
33,221.35 mt	22,791.664 mt	20,132.383 mt	20,766.48 mt
PK (KER: 4.19 %)	PK (KER: 4.18%)		PK (KER: 4.00%)
7003.00 mt	6,941.613 mt	4,478.717 mt	3,955.52 mt

Note: *Include approved extension volume of FFB, CPO and PK.

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10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Jun'20	3007.156	972.516
2	Jul'20	2306.950	935.472
3	Aug'20	1986.311	921.574
4	Sept' 20	3111.032	1123.790
5	Oct'20	2408.850	704.458
6	Nov'20	1923.622	539.620
7	Dec'20	1767.891	419.751
8	Jan'21	968.370	213.131
9	Feb'21	1075.430	244.380
10	Mar'21	1137.12	211.609
11	Apr'21	1419.868	297.795
12	May 2021	1,679.06	357.52
13	June 2021	2,055.72	538.75
14	July 2021	1,988.77	395.19
15	Aug 2021	2,613.68	692.02
16	Sept 2021	2,932.12	589.70
17	Oct 2021	2,636.79	595.67
18	Nov 2021	2,172.91	402.82
19	Dec 2021	1,821.77	424.39
20	Jan 2022	1,004.18	252.08
21	Feb 2022	1,480.67	290.32
22	Mar 2022	1,425.77	297.77
TOTAL		42,924.05	11,420.33

11. Summary of Actual Volume sold					
Current License period (June 2021- Mar 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	11,456.37	2,490.39	nil	1,642.79	15,589.55
PK (MT)	2,824.40			566.63	3,391.03
Credits	-	-	-	-	-
Previous License period (Jun2020-May 2021)					
CPO (MT)	2,052.43	10,903.78	nil	2,228.98	15,185.19

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PK (MT)	-			899.74	899.74
Credits	-	-	-	-	-

Note:

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

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

No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
01	A	BVC-RSPO-20170515-1	13,508.80	
02	B	CU-RSPO SCC-815406		2,824.40
TOTAL			13,508.80	2,824.40

11B. Records of CPO & PK Sold under other schemes since the last audit (if any)

No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	A	ISCC	13,394.17	-
TOTAL			13,394.17	-

11C. Records of CPO & PK Sold as conventional since the last audit (if any)

No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	A	3,871.77	-
2	B	-	1,466.37
TOTAL		3,871.77	1,466.37

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)
	N/A	N/A	N/A
TOTAL			N/A

12. Independent Smallholders Certified Tonnage / Volume

Estimated last year (Not Applicable)		Actual (Not Applicable)			Forecast (Not Applicable)			
Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B

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Phase	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPPO	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-CSPPO	IS-CSPK	IS-CSPKE
Current License period (Not Applicable)						
Credits				N/A	N/A	N/A
Physical	N/A	N/A	N/A	N/A		

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
Representative: 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 **11-15/04/2022**. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on **17/03/2021** (https://www.bsigroup.com/globalassets/localfiles/en-my/rspo/Public%20Notification/2021/04-01-rspo-public-notification_recertification_genting-sabapalm-oil-mill--supply-base_english.pdf) Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24th March 2020. The remote audit was conducted on **27/05/2021**.

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

The Critical NC close out on-site assessment was conducted on **05/07/2022**. The audit programs are included in Section 2.3.

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

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each

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

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

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

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

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

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

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

Tentative Date of Next Visit: April 11, 2022 – April 14, 2022

Total Number of Mandays: 9.5 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Mohd. Razaleigh Mohamad (MRM)	Team Leader	<p>Education: Holds a Bachelor Degree in Plantation Management and Agrotechnology, University Technology Mara (UiTM).</p> <p>Work Experience: He has 5 years’ experience in Oil Palm Estate Management with Tradewinds Plantation Berhad. The last position held was Senior Assistant Manager. He has more than 4 years of experience in Third Party Certification Audit with Control Union (M) Sdn Bhd for RSPO P&C, MSPO P&C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements.</p> <p>Training attended: He has completed ISO 9001-2015 Lead Auditor Course, ISO14001- 2015 Lead Auditor Course, ISO45001-2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed MSPO P&C Lead Auditor Course, Social Accountability SA8000 Auditor Course, RSPO Independent Smallholder (IHS) Auditor Training.</p> <p>Aspects covered in this audit: During this assessment, he assessed on the aspects of Policy and commitment, Social requirements, contract agreement, human rights, workers’ welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue and supply chain.</p> <p>Language proficiency: Fluent in English and Bahasa Malaysia</p>
Vijay Kanna Pakirisamy (VKP)	Team Member	<p>Education: Holds a Bachelor Degree in Agribusiness Science Management with Honours, University Utara Malaysia.</p>

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		<p>Work Experience: He has 10 years' experience in Oil Palm Estate Management in leading Oil Palm Companies such as KL Kepong Bhd, IOI Plantations and United Plantations. The last position held was Senior Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He has been an sustainable palm oil auditor since 2019.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, HCV & HCS Introductory Training g and SMETA Requirements Training, RSPO Independent Smallholder (IHS) Auditor Training.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of Occupational, Health & Safety, Estate Best Practises and supply chain requirements.</p> <p>Language proficiency: Fluent in English, Bahasa Malaysia, Tamil.</p>
<p>Yusof Khairan Nizar (YKN)</p>	<p>Team Member</p>	<p>Education: Holds a Diploma in Public Administration-ITM (1991), Certificate of Safety and Health Officer-MII (2003), Bachelor of Corporate Administration (Hons), MARA University of Technology and a Master of Science in Occupational Safety and Health Management-Northern University of Malaysia.</p> <p>Work Experience: Has more than 30 years of working experience in varies industries including as safety officer in manufacturing company; consultant and trainer for management systems including ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, OHSAS 18001:2007, MS1722:2011, Environmental Legislation; contract auditor with varies accredited certification bodies for scheme including Malaysia Sustainable Palm Oil (MSPO), RSPO Principles & Criteria; MPOCC Registered Peer Reviewer and was a Certificate of Safety and Health Officer-Malaysian Insurance Institute.</p> <p>Training attended: He has completed ISO 9001:2000 IRCA/IATC A Lead Auditor Training; ISO 14001:2004 IEMA Approved EMS Advanced Lead Auditor Training Course; OH&SMS IRCA Certified Lead Auditor Training Course; MS 1722 Lead Auditor Training; MSPO Auditing; Endorsed RSPO P&C 2018 Lead Auditor Course; SMETA Requirements Training; HCV & HCS Introductory Training. Also attended the Quality & Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment – For Bodied Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality Malaysia, ISO/IEC 17021. MSPO Peer Reviewer Training (MPOCC).</p> <p>Area Covered in Audit: Management and commitment, Legal requirements, OSH, best practices and biodiversity environment.</p> <p>Language Proficiency: Fluent in English and Bahasa Malaysia</p>

Accompanying Persons:

Name	Role
Mohamed Hidhir Zainal Abidin	Observer

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2.3 Assessment Plan

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

Date	Time	Subjects	MRM	VKP	YKN
Sunday 10/04/2022		Audit team travel from Kuala Lumpur to Sandakan. Flight number AK5194, estimated arrival at 1555pm	√	√	√
		Overnight in Sandakan (Pavillion Hotel)	√	√	√
Monday 11/04/2022 Genting Sabapalm Oil Mill	0630	Travel to Sabapalm POM complex	√	√	√
	0830-0900	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit Team Leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). 	√	√	√
	0900-1200	Inspection: 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.		√	√
	1200-1300	Lunch/ Rest			
	1300-1630	Inspection: 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.		√	√
	1630	Interim Closing briefing.	√	√	√
Tuesday 12/04/2022 Genting Sabapalm Oil Mill	0830-1200	Document review P1 – P7: Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCCS general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	√	√	√
	1000-1200	Stakeholder consultation	√		
	1200-1300	Lunch/ Rest			

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Date	Time	Subjects	MRM	VKP	YKN
	1300-1630	Document review P1 – P7: Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCCS general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	√	√	√
Wednesday 13/04/2022 Genting Sabapalm Oil Mill/ Genting Sabapalm Estate	1630	Interim Closing briefing.	√	√	√
	0830-1200	Document review P1 – P7: Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCCS general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	√	√	√
	1200-1300	Lunch/ Rest			
	1300-1330	Travel to Sabapalm Estate	√	√	√
	1330-1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	1630	Interim Closing briefing.			
Thursday 14/04/2022 Genting Sabapalm Estate	0830-1200	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.		√	√
	1200-1300	Lunch/ Rest			
	1300-1630	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.		√	√
	1630	Interim briefing			

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Date	Time	Subjects	MRM	VKP	YKN
Friday 15/04/2022	0830-1200	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.)	√	√	√
	1200-1300	Lunch/ Rest	√	√	√
	1300-1400	Preparation of closing meeting	√	√	√
	1400-1500	Closing Meeting	√	√	√
	1500	Auditors travel to Sandakan / Overnight in Sandakan	√	√	√
Saturday 16/04/2022		Auditor travel back to Kuala Lumpur via Air Asia AK5199 depart 0935	√	√	√

Date	Time	Subjects	MRM
Thursday, 05/07/2022	0900 – 0930	Opening Meeting at Genting Sabapalm POM : - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan	√
	0930 – 1230	1. Verification on Critical NC: <ul style="list-style-type: none"> • 2189110-202204-M1 • 2189110-202204-M1 2. Site observation, workers interview 3. Document review – implemented evidence	√
	1230 – 1300	Closing Meeting	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	The time bound plan has included all the subsidiaries of Genting Plantations Berhad. The TBP includes all units in Malaysia and Indonesia. The detail of the subsidiaries and the management units is as per Approved Time Bound Plan below.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	No. As stated in the updated time bound plan which has been updated on 15/11/2021, the management of Genting Plantations Berhad has plan to certify all the complexes until October 2023. The updated time bound plan shows that the plan spans from year 2014 until year 2023. The delays are due to the following factors: <ol style="list-style-type: none"> 1) Some estates in Indonesia are in progress to obtain their Hak Guna Usaha (HGU). 2) PT SP, KMJ, DWK is in the process of obtaining Forest Release and Forest Exchange prior to HGU application. 3) RACP in progress for Genting Kencana Estate. 4) Standalone HCSA reports are in progress to be peer reviewed. 5) NPP in progress for PT SISM, PT SMA (additional areas) and PT KIU 	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	No new acquisitions as of Nov 2021. Nonetheless, there is a three parts of expansion of land area at PT Sepanjang Inti Surya Mulia i.e. Area 199 Ha, Area 100 Ha and Area 1300 Ha. As per comment in table below, the required assessments were being conducted and in progress.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No deviations	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No changes in the 100% certification targets, except for adjustment of dates for planned certification. ACOP Reporting has been verified and found to be consistent.	Complied

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

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	been submitted and approved. 3 Remediation Plans are required which 1 of them has been submitted.	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No outstanding labour disputes. <u>Indonesian Operating Unit</u> SOP - HRD-04-00.00 Penyelesaian Keluh Kesah <u>Malaysian Operating Unit</u> SMP-GPB-19 Complaints and Grievances	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	In progress to obtain Hak Guna Usaha (HGU). Refer to TBP (9 Nov 2021)	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. Sustainability Dept conducts the internal audit. Positive Assurance Statement 2021 was made available for verification.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	None raised.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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

Approved Time Bound Plan

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

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13	Genting Tanjung Bahagia Sdn Bhd (100%) for estates	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah Oil Mill, Sabah, Malaysia	July, 2022		Concept Note for RACP approved on 19/11/2021. RACP plan submitted and approved on 04/04/2022. Initial Audit conducted in May 2022
14	Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Permai Estate, Sabah, Malaysia				
15		Genting Kencana Estate, Sabah, Malaysia				
16	Genting Oil Mills (Sabah) Sdn Bhd (100%) for estate and mill	Genting Jambongan Estate, Sabah, Malaysia	Supply base for Genting Jambongan Oil Mill, Sabah, Malaysia	Sept 2019	Certified	None
17	Genting Plantations Bhd Wawasan Land Progress Sdn Bhd (100%) Genting Oil Mills (Sabah) (Mill)	Genting Sekong Estate, Sabah, Malaysia	Supply base for Genting Trushidup Oil Mill, Sabah, Malaysia	Sept, 2017	Certified	None
18	Asiaticom Sdn Bhd (100%) Sawit Sukau Usahasama Sdn Bhd(56%)	Genting Suan Lamba Estate, Sabah, Malaysia				
19	PT Sepanjang Intisurya Mulia (70%)	Mulia 1 & 2 Mulia 3 & 4 Mulia 5 & 6	Supply base for Mulia Oil Mill, Kalimantan, Indonesia	Oct, 2017	Certified	None
20	PT Sawit Mitra Abadi (70%)	Abadi 1 & 2 Abadi 3 & 4				
21	PT Sepanjang Intisurya Mulia (70%)	Area 199 Ha Area 1300 Ha	Supply base for Mulia Oil Mill,	Oct, 2023		In Process of NPP In Process of NPP In process of obtaining HGU.

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22	PT Sawit Mitra Abadi (70%)	Area 1000 Ha	Kalimantan, Indonesia			NPP Process In process of obtaining HGU. HCS Report completed peer review.
23	Genting Plantations Berhad (100%) Estate Genting Oil Mills (Sabah) Sdn Bhd (Mill)	Genting Mewah Estate, Sabah, Malaysia	Supply base for Genting Mewah Oil Mill, Sabah, Malaysia	Mar, 2017	Certified	None
24	Genting Plantations (WM) Sdn Bhd (100%)	Genting Bukit Sembilan Estate, Kedah, Malaysia		July, 2017	Certified	None
25	PT Globalindo Agung Lestari (60%)	Lamunti Barat Estate Lamunti Timur Estate I &II Mengkatip Estate I & II Bakuta Estate Plasma Timur & Barat	Supply base for Globalindo Oil Mill, Kalimantan, Indonesia	Aug, 2022		NPP and HCSA Report completed for PT UAI. HGU obtained for UAI.
26	PT United Agro Indonesia(60%)	PT UAI 1 & 2 UAI Plasma		Oct, 2023		
27	PT Susantri Permai (95%)	Puroh Estate Masaha Estate Zircon Hill Estate SP Plasma	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia	Oct, 2023 Oct, 2023		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
28	PT Kapuas Maju Jaya (95%)	Waterfall Estate I & II Muhun Estate I & II Talawang Estate I & II	Supply bases for Golden Hill Oil	Oct, 2023		In the process of obtaining Forest Release and Forest

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		KMJ Plasma	Mill, Kalimantan Indonesia	Oct, 2023		Exchange prior to HGU application.
29	PT Dwie Warna Karya (95%)	Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate		Oct, 2023		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		DWK Plasma		Oct, 2023		
30	PT Citra Sawit Cemerlang (70%)	CSC Estates	Supply base for Mulia Oil Mill	Oct, 2023		In process of obtaining HGU. HCSA report completed review.
31	PT Surya Agro Palma (70%)	SAP Estate 1&2 SAP Estate 3&4 SAP Estate 5&6	Supply base for Cemerlang Oil Mill, Kalimantan, Indonesia	Sept, 2023		In process of obtaining HGU. HCSA report completed review.
		Plasma		Sept, 2023		
32	PT Agro Abadi Cemerlang (70%)	AAC 1 & 2		Sept, 2023		In process of obtaining HGU HCSA report completed review. Report not published yet.
		AAC 3 & 4				
		Plasma – KSK1, KMB, BSL		Sept, 2023		
33	PT Palma Agro Lestari Jaya (70%)	PALJ Estates		Dec, 2023		In process of obtaining HGU. HCSA report completed review.
		PALJ Plasma				
34	Knowledge One Investment Pte Ltd (85%)-PT Kharisma Inti Usaha (KIU)	KIU 1 & 2 KIU 3 & 4	Supply base for KIU Oil Mill	Dec 2022		NPP in progress. HCV report approved by HCVRN. HCSA report is completed and waiting for peer review.
		KIU Plasma		Dec 2022		

3.3 Details of Nonconformities

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

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

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

Non-conformity															
NCR Ref #	2189110-202204-M1	Date Issued	15/04/2022												
Due Date	15/07/2022	Date of nonconformity Closure	05/07/2022												
Clause & Category (Critical / Minor)	2.1.1 (Critical)														
Statement of Nonconformity:	1. No written notification to DOE for fume hood has been done 2. DOE registered environmental audit has not been done as per requirement 3. Woman Working at Night Permit from Sabah Labor Department has not been acquired.														
Requirement Reference:	The Unit of Certification complies with legal requirements														
Objective Evidence:	Genting Sabapalm POM has not established evidence of compliance to legal requirements for: <ol style="list-style-type: none"> No Written Notification to DOE under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 for one unit of Fume Hood located in Laboratory of Genting Sabapalm Oil Mill. Compliance Audit by DOE Registered Environmental Audit to conduct compliance audit at least 2 times a year as required by DOE License No. 005261 for period of 01/07/21-30/06/22 has not been conducted yet. This was also highlighted in Notis Arahan under Section 31(1) Environmental Quality Act 1974 to be done within within 4 weeks from the notice dated 18/01/22 from DOE Sabah Sample of punch card has been taken for August, November 2021 and February 2022, and found out that 2 women workers (employment number E00606 and E11334) has been working more than 10pm for date as follow <table border="1" data-bbox="678 1765 1300 1892"> <tbody> <tr> <td>E00606</td> <td>09/08/2021</td> <td>23.52</td> </tr> <tr> <td></td> <td>15/08/2021</td> <td>00.28</td> </tr> <tr> <td>E11334</td> <td>13/08/2021</td> <td>23.28</td> </tr> <tr> <td></td> <td>16/08/2021</td> <td>23.02</td> </tr> </tbody> </table> <p>However, Genting Sabapalm Estate did not acquire the Woman Working at Night Permit from Sabah Labor Department.</p>			E00606	09/08/2021	23.52		15/08/2021	00.28	E11334	13/08/2021	23.28		16/08/2021	23.02
E00606	09/08/2021	23.52													
	15/08/2021	00.28													
E11334	13/08/2021	23.28													
	16/08/2021	23.02													

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Corrections:	<ol style="list-style-type: none"> 1. As the submission requires professional endorsement on the design, we will proceed to obtain quotation and approval on the submission. 2. Proceed with approval after obtaining another quotation and proceed to engage the best solution as our third party auditor. 3. Estate management to review and updating the HIRARC Checklist and activity for the risk and exposure on handling workers on any covid-19 issues as well as the usage of the mini / mid tractor grabber in the estate. 4. To transfer the 2 female weighbridge operator from the estate check roll to the mill check roll starting April 2022.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Ineffective mechanism to monitor compliance of legal re 2. The requirement for Fume Hood Notification to DOE not complied due to the requirement was not stated at the mill Legal Register. The mill PIC also not checking the requirements with DOE. 3. Late in obtaining another quotation besides R & K consultancy as company required minimum 2 quotations. 4. No checking have been made due to the 2 female weighbridge operator recruited under the estate 5. Estate management unaware of updating the HIRARC Checklist and activity on the risk and exposure of clinic staff to covid-19 from handling workers with symptoms, suspected patients, testing and disposal of RTK Test Kits.
Corrective Actions:	<ol style="list-style-type: none"> 1. To update the Legal Register requirement. 2. To prepare schedule for the Environmental Audit as monitoring tools together with other environmental compliance requirements 3. Estate management to ensure HIRARC Checklist and activity for risk control and measures will be promptly reviewed and updated periodically. 4. Estate management to request the grabber (Solaris) supplier to train the operator on the floating valve operation to allow the mini grabber extension arm, parked at the trailer during moving. 5. The estate management to inform the mill if there is new recruitment for weighbridge operator to the mill for their information and action.
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Current fume hood did not have any document such as engineering drawing with IR Capex. Request for unbudgeted capex approval submitted on 26/05/2022 by the POM manager, Mr Elbert Tay Kuang Te and has been approved by Senior Vice President Group Processing, Mr James Chung Khim Hon. Quotation received from 3 different supplier and purchase order sighted dated 04/06/2022. Legal register updated to include written notification to DOE for Fume Hood. 2. Legal register for environmental audit updated under Peraturan-peraturan kualiti alam sekeliling (Permis yang ditetapkan) (Minyak kelapa sawit mentah), 1977- P.U (A) 342/1977, in clause 42, to appoint DOE registered auditor to conduct 3rd party audit at least 2 times per year. Latest environmental audit has been done 16/04/2022 and the audit report sighted in the document "Environmental compliance audit report (1/2022), "Pematuhan syarat-syarat lesen premis minyak kelapa sawit mentah, jadual pematuhan No Lesen 005261, Genting Sabapalm POM" done by The Best Solution Sdn Bhd with 4

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	<p>findings (1 AFI and 3 OFI) and submitted to Jabatan Alam Sekitar Negeri Sabah. Next audit has been scheduled on October 2022 and need to inform to Genting 2 weeks prior to the audit.</p> <p>3. Evidence sighted 2 workers has been transferred from estate to POM base on memo 14/04/2022 reference number GSPE/2022/04/056/THY/hs. The workers has been included in the POM checkroll base on the document "Checkroll summary for the month of Apr-22"</p> <p>4. Briefing to contractor regarding safety and health compliance by safety officer for both contractor workers on 08/06/2022. Beside of that, all contract workers need to sign Borang Akuan Taklimat/Latihan Induksi as evidence that they already attended training. Signage has been set up and area has been barricade/ fenced up.</p> <p>Based on the evidence provided and the visit to the mill's effluent pond it was found that the corrections and corrective action plans have been addressed accordingly. Therefore, the Critical Non-Conformity is successfully closed on 05/07/2022.</p>
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Non-conformity			
NCR Ref #	2189110-202204-M2	Date Issued	15/04/2022
Due Date	15/07/2022	Date of nonconformity Closure	05/07/2022
Clause & Category (Critical / Minor)	3.6.1 (Critical)		
Statement of Nonconformity:	<ol style="list-style-type: none"> 1. Risk assessment for construction site has not been adequately assessed. 2. Risk of clinic staff to COVID-19 has not been assessed 3. Risk for mini/midi tractor grabber has not been adequately assessed. 		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<ol style="list-style-type: none"> 1. The hazard risk of exposure to children living adjacent to construction activity of 4 blocks of housing of Genting Sabapalm POM found not adequately controlled as no fencing/barricade and safety warning signage posted to avoid any unauthorized entrance and potential accident. 2. The risk and exposure of clinic staff to Covid-19 from activity of handling workers with symptoms, suspected patients and testing and disposal RTK Test Kits not identified and updated as verified from HIRARC Checklist and activity No. 25 Clinic, which was last reviewed on 16/03/18. 3. While returning back from site visit sighted Mini/Midi Tractor Graber travelling on the road with grabber part hanging and swinging on the side of the road, hazardous to other traffic user. Further sampling on HIRAR Form NO. 42 dated 16/03/18 found the condition not identified and assessed for Mini/Midi Tractor Graber and no specific Safe Operation Procedure. 		
Corrections:	<ol style="list-style-type: none"> 1. To call the contractor and conduct briefing regarding the requirements to comply with safety and health within the company premises. The project area to be barricade with proper signage. 		

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	<ol style="list-style-type: none"> 2. Estate management to review and updating the HIRARC Checklist and activity for the risk and exposure on handling workers on any COVID-19 issues as well as the usage of the mini / mid tractor grabber in the estate. 3. All operator of mini/mid tractor grabber has been instructed to ensure the hanging and swinging part of the grabber must be cautiously set on the left side of the tractor or in the trailer at all time while travelling on the road.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. There is no monitoring conducted by the Mill personnel and Safety officer regarding the safety and health compliance to the contractor 2. Estate management unaware of updating the HIRARC Checklist and activity on the risk and exposure of clinic staff to covid-19 from handling workers with symptoms, suspected patients, testing and disposal of RTK Test Kits. 3. Estate management also overlooked on reviewing and updating the HIRARC Checklist and activity for using mini / mid grabber as sighted for Mini/Midi tractor Grabber travelling on the road with hanging and swinging on the side of the road which hazardous to the other traffic user.
Corrective Actions:	<ol style="list-style-type: none"> 1. Future construction job HIRARC and/or Job Risk Assessment submitted to management before allowed to start and SHO to conduct training to mill personnel and to verify the contractor Job Risk Assessment prior to the commencing of work. 2. Estate management to ensure HIRARC Checklist and activity for risk control and measures will be promptly reviewed and updated periodically. 3. Estate management to request the grabber (Solaris) supplier to train the operator on the floating valve operation to allow the mini grabber extension arm, parked at the trailer during moving.
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Hazard risk assessment (HIRARC) for mini/midi updated on 28/04/2022 title Pengoperasian grabber assessed by Mr Frederick Francis with 3 other members, Mr Eshwar A/L Ganeshparan, Rayner Dominic and Malini Bolokan and approved by Mr Tan Yeong Huat. As per assessment, it has been identified the grabber position while moving, stated in the risk assessment, SOP will be established and to conduct training for all mini/midi operator. New SOPs established in the document title "Prosedur Kerja Selamat, Pengoperasin tractor grabber" dated June 2022. Stated in the SOPs, while travelling, grabber need to be placed at the left site of the mini/midi or at the back of trailer. Training records sighted for grabber operator on 04/07/2022 done Mr Lim Chai Huat, title Latihan Keselamatan, SOP & Teknikal attended by 21 operator. 2. Risk assessment for clinic updated on 23/04/2022 title "Klinik Ladang" assessed by Mr Frederick Francis with 3 other members, Mr Eshwar A/L Ganeshparan, Rayner Dominic and Malini Bolokan and approved by Mr Tan Yeong Huat. Risk assessment for COVID 19 checkup which stated risk control is to conduct training for HA proper ways to do RTK test. Training conducted in 27/06/2022 done by Puan Malini Bolokan Bansinai, hospital assistant.

Non-conformity			
NCR Ref #	2189110-202204-N1	Date Issued	15/04/2022

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Due Date	Next ASA	Date of nonconformity Closure	Open
Clause & Category (Critical / Minor)	2.2.2 (Minor)		
Statement of Nonconformity:	Agreement with the FFB supplier did not contain clauses on meeting applicable legal requirements and Canteen/Grocery store unable to demonstrated compliance to legal requirement		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available		
Objective Evidence:	<p><u>Genting Sabapalm POM</u></p> <p>Total 238 smallholders listed in the list of stakeholders for both active and inactive supplier. Samples of agreement have been taken and verified. However, the agreement did not contain on meeting applicable legal requirements.</p> <p><u>Genting Sabapalm Estate</u></p> <p>There are 4 canteen/grocery store operated in the Genting Sabapalm Estate line sites and has been included in the stakeholders list.</p> <p>However, it has been sighted that the shop operates using business licenses for another shop in Telupid Town. It also sighted that; the shop sells LPG gas to workers without any permit and incompliance with Akta Kawalan Bekalan 1961 . The contractor unable to demonstrate compliance to legal requirement, thus, non-conformities has been raised</p>		
Corrections:	<ol style="list-style-type: none"> 1. Re-circulate questionnaire on matters regarding meeting applicable legal requirements to existing FFB suppliers 2. To conduct meeting with shop owners to make them aware of the need for permits to sell cylinder gas and to make necessary changes to their licenses i.e. to add GSPE address to their licenses 		
Root Cause Analysis:	<ol style="list-style-type: none"> 1. The requirement to include the clauses of meeting applicable legal requirements was not done due to the 238 smallholders have no seal Memorandum Of Agreements (MOA) with the mill. They are free to sell their crops to any mill or collecting center nearby. 2. Sundry shop owners were not aware of the need to attain license from authorities for sale of cylinder gas and the need to add an additional address to their current business license 		
Corrective Actions:	<ol style="list-style-type: none"> 1. The newly amended smallholder questioner will be used for the newly engage FFB supplier in future 2. Estate management will ensure that shop owners that do not acquire permits will not be allowed to sell gas cylinders. Meeting with shop owners have been conducted and shop owners who wish to sell gas cylinders have been notified that they must acquire proper permits. Shop owners have also been notified to update their business licenses by adding GSPE address to them and displaying them at their respective shops. 		

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Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.
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Non-conformity			
NCR Ref #	2189110-202204-N2	Date Issued	15/04/2022
Due Date	Next ASA	Date of nonconformity Closure	Open
Clause & Category (Critical / Minor)	2.2.3 (Minor)		
Statement of Nonconformity:	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		
Requirement Reference:	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.		
Objective Evidence:	<p><u>Genting Sabapalm POM</u></p> <p>Total 238 smallholders listed in the list of stakeholders for both active and inactive supplier. Samples of agreement have been taken and verified. However, the agreement did not contain clauses disallowing child, forced and trafficked labour.</p>		
Corrections:	Re-circulate questionnaire on matters regarding meeting applicable legal requirements to existing FFB suppliers		
Root Cause Analysis:	The requirement to include the clauses of meeting applicable legal requirements was not done due to the 238 smallholders have no seal Memorandum Of Agreements (MOA) with the mill. They are free to sell their crops to any mill or collecting center nearby.		
Corrective Actions:	The newly amended smallholder questioner will be used for the newly engage FFB supplier in future		
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.		

Non-conformity			
NCR Ref #	2189110-202204-N3	Date Issued	15/04/2022
Due Date	Next ASA	Date of nonconformity Closure	Open
Clause & Category (Critical / Minor)	3.4.2 (Minor)		
Statement of Nonconformity:	The SEIA and Environmental Management Plans have not been developed adequately.		

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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:	<ol style="list-style-type: none"> 1. Environmental Aspect and Impact Assessment (EAI) was updated on 08/02/2022. Sighted the construction of New Linesite at Sapi Division, Genting Sabapalm Estate. Nevertheless, the Social and Environmental Aspects and Impacts were not identified in the EAI. 2. The HCV Management Plan have been established. Nevertheless, the HCV Management and Monitoring Plan have not identified the Bangkawat River Buffer zone as an area to be conserved. Visit to the area indicated that there were no clear establishment of buffer zones along the river areas and operational works were ongoing as normal. 3. Recommendation of the negative issues that has been highlighted has been stated in the same document Social impact assessment report. Stated in the recommendation for that issues are to communicate the issues during the committee meeting and explanation on the process of application. However, there is no evidence management plan has been developed in participatory ways and monitoring plan has been established. Thus, non-conformities have been raised.
Corrections:	<ol style="list-style-type: none"> 1. Estate management to immediately review and update the construction of the New Linesite at Sapi Division in the EAI 2. A clear signage and marking of buffer zone has been established along the Bangkawat Rivers as well as re-training to respective workers for awareness. 3. The management plan in participatory ways for committee meeting has been reviewed and updated for Social Impact Assessment report
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Estate management unaware to update the Social and Environment Aspects and Impacts of the construction of new linesite at Sapi Division, Genting Sabapalm Estate in the EAI. 2. Estate management overlooked on the HCV Management and Monitoring Plan for Bangkawat River Buffer zone as an area to be conserved. 3. Estate management also not develop the management plan in participatory ways and monitoring plan in the same document of Social Impact Assessment report.
Corrective Actions:	<ol style="list-style-type: none"> 1. Estate management to immediately review and update of any activity related to environment in the EAI 2. Estate to ensure to maintain a clear signage and marking of buffer zone along the Bangkawat Rivers as well as re-training to respective workers for awareness. 3. Estate to ensure to develop the management plan in participatory ways for committee meeting and updating the process of application. 4. The management will conduct training to all personnel in order to communicate requirement on social/environmental impact assessment.
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	Indicator 2.1.1 2189110-202204-I1 Genting Sabapalm Oil Mill to further ensure the capacity and enhance condition of bunding built for diesel storage tanks (16,000 litres each) as Guidelines of Storage of Hazardous Substance located in the mill and enhance warning sign of non-smoking as requirement of Jabatan Bomba dan Penyelamat Malaysia.
OFI 2	Indicator 6.1.5 2189110-202204-I2 Gender Committee has been established for both POM and estates and has been name as Ahli Jawatan Kuasa Wanita dan Kanak- Kanak. Establishment of the committee can be further improved with activities/planning related to children development and awareness on importance of education
OFI 3	Indicator 1.1.3 2189110-202204-I3 Good social contribution has been done and all request has been responded by the management to all stakeholders. It can be further improved by identifying effective channel to communicate the status of the request by the stakeholders

Positive Findings	
PF #	Description
PF 1	Good commitment and corporation from the management.
PF 2	Positive feedbacks from internal and external stakeholders.
PF 3	Well maintained labour quarters at the mill and estate.
PF 4	Generally, well implementation of Good Agricultural Practices (GAP).

3.3.1 Status of Nonconformities Previously Identified and Observations.

Non-conformity			
NCR Ref #	1929260-202007-N1	Date Issued	09/07/2020
Due Date	01/06/2021	Date of nonconformity Closure	01/06/2021
Clause & Category (Critical / Minor)	1.1.5 RSPO P&C MYNI- 2019 (Minor)		
Statement of Nonconformity:	Stakeholders lists are incomplete and not updated.		

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Requirement Reference:	There is a current list of contact and details of stakeholders and their nominated representatives.
Objective Evidence:	<p>Timbalan Pengarah Pegawai Imigresen, AG Mohd Yusof who was named as the nominated representative of the Sandakan Immigration Office has retired, and this change has not been updated in the Stakeholder Lists of both GSPE and GSOM.</p> <p>GSPE employs 391 Indonesian workers and 2 Philippines nationals. GSOM employs 18 Indonesian workers. However, the Indonesian Consulate in Kota Kinabalu and the Philippines Embassy in Kuala Lumpur are not listed as stakeholders in both stakeholder lists.</p>
Corrections:	To update the stakeholder list accordingly to include latest Timbalan Pengarah Pegawai Imigresen, Indonesian Consulate in Kota Kinabalu and the Philippines Embassy in Kuala Lumpur.
Root Cause Analysis:	<p>1. Changes on the Immigration Dept director was not inform by HR-GPOS to the OU's, because OUs has no direct contact/deal with the Immigration Dept since any issue related to this department is handled by HRAD at GPOS. 2. The Indonesia Konsulat Jeneral in Kota Kinabalu and Philippines Embassy in Kuala Lumpur was not included in the GSOM and GSPE stakeholder list because Sustainability Department Sabah misunderstood that they are irrelevant since GSOM and GSPE have no direct contact with them.</p> <p>* HRAD – Human Resources & Administration Dept GPOS – Genting Plantations Office Sabah, Sandakan.</p>
Corrective Actions:	<p>OUs shall update and verify the stakeholder list at least once a year and/or before the internal sustainability audit and external certification audits – as per Social Management Procedure SMP-GPB-32, clause 6.2</p> <p>To update the social procedure to include the job responsibility of HR department to notify Operating unit of any changes.</p> <p>Trainings to the OUs and HR.</p>
Assessment Conclusion:	<p>The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.</p> <p>Verification R01: (Remote) Current list of stakeholders containing their nominated representatives contact and details available dated 15/3/2021 for GSPE and for GSOM the internal and external stakeholders among local communities, authorities, vendors, and neighbours updated on 25/3/2021, thus Minor NC is closed.</p> <p>Verification R01: (Onsite) List of stakeholders for Genting Sabapalm POM updated in February 2022 and as per social management plan will be updated on annual basis. List of stakeholders has been categories for few different categories which contracted parties, villages, government agencies, and FFB supplier.</p> <p>While for Genting Sabapalm Estate, list of stakeholders has been classified into 2 which are external and internal stakeholder. For internal stakeholder mainly consist of nearby smallholder, contractor, religion bodies and supplier.</p> <p>Details of information included name of the company, address, phone number and contact persons.</p>

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Non-conformity			
NCR Ref #	1929260-202007-N2	Date Issued	09/07/2020
Due Date	01/06/2021	Date of nonconformity Closure	01/06/2021
Clause & Category (Critical / Minor)	3.3.2 RSPO P&C MYNI- Minor		
Statement of Nonconformity:	Standard Operating Procedures are not consistently implemented.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<ol style="list-style-type: none"> 1. Section 6.8.2 Procedure of Social Management (Doc. No. SMP-GPB-32, Rev. 00 dated 18 Jan 2018 states that Workers Committee Meetings shall be conducted at least quarterly or whenever necessary. However, records show that the Workers' Committee Meetings were held as follows: <ol style="list-style-type: none"> a) At GSPE: 18 June 2019 and 14 Feb 2020. b) At GSOM: 6 March 2020 and 8 Oct 2019. 2. Clause 3 (ii) of SOP Revision 3 dated 11 October 2013 - Langkah-Langkah Perlu Dipatuhi di Kawasan Perumahan, Pusat Asuhan Kanak-Kanak dan Sekolah effective Januari 2011 states that all animal coups ("pondok binatang") must be at least 50 meters away from the housing. At the linesite in Bangkawat Division and Kpg Bahagia 1, chicken coups were placed approximately 10m - 15m from the workers' houses. In addition, housing inspection reports have also identified the issue of chicken coups locations in weekly inspection reports dated 7 Feb 2020, 11 Feb 2020, 20 April 2020, 18 May 2020, 4 June 2020, 22 June 2020. 3. Harvester (Workers id: E11280, E11276 & E11307) was not provided with the safety shoes, verified as per interview and issuance record. This does not comply with Standard Operating Procedure (SOP) revision 3 dated 11 Oct 2013. 4. No health declaration was conducted before entering confined space as verified from PTW dated 4/5/2019 and 2/5/2019. This was not followed as per Safe Operating Procedure for Confined space (GSOM-SOP-MGR-03) dated 3 Jan 2010. Last health declaration conducted was on 2017 		
Corrections:	<ol style="list-style-type: none"> 1. GSPE and GSOM to prepare committee meeting schedule for the year 2020 and the schedule to be verified by Mill Manager and Estate Senior Manager. The Sustainability Department will conduct checking on the schedule compliance during monthly follow up visit. 2. Estate to carry out SOP briefing to the Bangkawat workers and any animal coups must be kept away from housing as per SOP. 3. PPE checklist during morning muster need to be conducted on a weekly basis to ensure all workers are provide with correct and proper PPE condition. 4. Amend SOP for Confined space (GSOM-SOP-MGR-03) ii) Conduct training to all workers on revised SOP for Confined space iii) Health declaration form shall be attached with the PTW as a complete set iv). Health declaration must be done prior to working in confine space 		

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Root Cause Analysis:	<ol style="list-style-type: none"> 1. Frequency of meeting for GSPE Workers Committee (JCC) was not following the procedure requirements due to the PIC was never read the procedure and there is no checking by estate sustainability coordinator. 2. The SOP clause 3(ii) and HA weekly housing inspection report regarding the chicken coops was not effectively implemented due to shortage of staff and increase work load in paper work 3. No monitoring on PPE issuance conducted by the divisional staff and assistant. 4. No proper checking by the mill manager/engineer and the SOP for confine space (GSOM-SOP-MGR-03) was not updated.
Corrective Actions:	<ol style="list-style-type: none"> 1. GSOM and GSPE to schedule its committee meeting to be the same date with 2. OSH Committee meeting. OSH committee meeting was conducted at least once in three month as per OSHA 1994 requirements. 3. Estate to fully utilized the HA weekly housing inspection report and VMO monthly visiting book as source of information regarding this issue as well as other issue and prompt action to be taken and documented. 4. Senior Assistant and assistant to verify the checklist and PPE stock must be adequate in the estate store. 5. In October 2020, Person in-charge will be attended NIOSH course for Confined Space competent person ie Authorized Gas Tester, Entry Supervisor, Authorized Entry and Standby Person. 6. Health Declaration form must be prepared for all confine space work by engineer and verified by mill manager. The health declaration must be checked by SHO during safety visit.
Assessment Conclusion:	<p>The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.</p> <p>Verification R01: (Remote)</p> <p>The programme plan was available for committee meeting, verification as per plan in Mill, OSH meeting latest record was on 31/3/2021 and previously record was on 15/12/2020 and 17/10/2020 was same as per plan updated.</p> <p>From verification on PPE issuance record dated 16/4/2021 the PPE was updated and on sampling workers show all PPE issuance record was up to date.</p> <p>Management also conduct the PPE checklist to ensure the workers wear PPE as per recommendation. Record available dated April 2021.</p> <p>Thus Minor NC is closed.</p> <p>Verification R01: (Onsite)</p> <ol style="list-style-type: none"> 1. Gender committee has been established for Genting Sabapalm POM and sighted the committee chart that has been led by Puan Surianti Mayah. Latest meeting has been done on 10/11/2021 and all women workers. While for Genting Sabapalm Estate, meeting has been conducted with representative of workers on 26/02/2022. Issues that was discussed are pregnancy medical check-up for women and best housing competition. Interview with gender committee chairman, Mdm Helena confirmed that gender committee meeting has been done at 3 months once. 2. As per site visit to workers housing, confirmed that chicken coops is located far from the housing which is more than 50m, it also has been confirmed base on the weekly linesite inspection and interview with the workers.

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	<p>3. All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required and appropriate PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers rooms were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause them.</p> <p>Sighted during site visit among sprayers, harvesters and manurers PPEs distributed without any charges such as Block 22 among Srayers in Sapi Division (Apron, helmets, safety boots, goggle, Nitrile hand glove and cartridge mask), Manuring at Block 92 in Klagan Division (3M Mask, apron, Nitrile glove, safety boots and goggles), Harvester in Klagan Division (safety boots, helmets). Sanitization facilities sighted at Chemical Store Area where a bath room located for washing PPEs and bathing after spraying and manuring activity. Washed PPEs will be left and kept at PPE area in the area and not allow to bring home. This was clearly understood based on interview session with spayers and manurers during site visit.</p> <p>Available an SOP for PPE Distribution to workers. Mentioned PPE is provided FOC to workers. Available PPE distribution records (Stock Card) maintained by Storekeeper as sampled.Sighted Store Requisition & Issuance Note for PPE dated:</p> <ol style="list-style-type: none"> a) 05/04/22 from Division Klagan requesting for 11 Safety Boots (yellow). b) 08/04/21 from Sapi Division requesting for 21 + 9 Safety Helmets. c) 08/04/22 from Sapi Division requesting for Safety Helmets. d) 08/04/22 from Bangkawat Division requesting for 6 Green Nitrile Gloves, 9 filter mask e) 07/04/21 from Klagan Division requesting for 6 Safety Helmets
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Non-conformity			
NCR Ref #	1929260-202007-N3	Date Issued	04/07/2020
Due Date	01/06/2021	Date of nonconformity Closure	01/06/2021
Clause & Category (Critical / Minor)	3.4.2 RSPO P&C MYNI- 2019 (Minor)		
Statement of Nonconformity:	The activity of contractors keeping spare parts and maintenance at labour quarters have yet to be addressed.		
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:	Based on the environmental aspect and impact assessment, the activity of contractors keeping spare parts and maintenance at the labour quarters have yet		

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	to be evaluated. It was found that trace of oil spillage at Block H, Kg Bahagia 1 where workers of a contractor (CM Enterprise).
Corrections:	Estate to assess the operation/activity and if the impact is significant, procedure/SOP must be prepared to mitigate the impact.
Root Cause Analysis:	The activity was not assessed by the estate, therefore no SOP available to mitigate the environmental impact
Corrective Actions:	Estate to review the current EAI to ensure all operation/activity are assessed. Training record to the estate Sustainability coordinator.
Assessment Conclusion:	The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit. Verification R01: The environmental management plan was established base on Environmental Aspect Impact analysis and documented in Environmental Improvement and Management Plan 2021. The plan was implemented to monitor the effectiveness of the mitigation measures. The plan covers the source of impact, negative impact, improvement/mitigation plan, date required, monitoring and action plan, PIC, timeline and status. The plan was reviewed on annual basis. Latest review was conducted on 8/2/2021 already included the housing area in the aspect and impact. Thus Minor NC is closed.

Non-conformity			
NCR Ref #	1929260-202007-N4	Date Issued	04/07/2020
Due Date	01/06/2021	Date of nonconformity Closure	01/06/2021
Clause & Category (Critical / Minor)	3.5.1 RSPO P&C MYNI- 2019 (Minor)		
Statement of Nonconformity:	There is no documented procedure for recruitment, selection, hiring, and promotion of workers.		
Requirement Reference:	Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination are documented and made available to the workers and their representatives where applicable.		
Objective Evidence:	The existing procedure Doc No. GEN-13 Rev 01 Issue Date 2017 entitled Procedural Instruction Foreign Workers Employment, Payment and Recoverable only covers procedures for employment and selection of foreign workers. The Genting Sabapalm certification unit therefore could not demonstrate the availability of documented procedures for Recruitment and selection of local workers; and - Promotion of foreign and local workers.		
Corrections:	To conduct training regarding this procedure to the estate and mill PIC		
Root Cause Analysis:	There is mis-communication between RSPO auditor and estate PIC regarding the 2 requirements which is clearly stated in the SMP-GPB-32 page 25, Item 3. The procedure is available but due to the estate PIC was not train regarding the procedure therefore unable to explain and provide evidence.		

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Corrective Actions:	Refresh training (annually) to be conducted to ensure competency level Satisfactory.
Assessment Conclusion:	<p>The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.</p> <p>Verification R01: (Remote) GSOM Certification Unit implemented the Procedure Manual of Manpower Recruitment and Orientation; Doc. # PM-MR-02; Rev. 00; Issue date: 2/1/2018 for recruitment, selection, hiring, promotion, retirement and termination and made available to the workers. As sample, latest communication of the policy and Genting SOP was conducted by GSOM during Morning Muster dated on 13/11/2020 and GSPE on 26/2/2021 attended by all staff and employees. Thus the Minor NCR is closed.</p> <p>Verification R01: (Onsite) As sample, latest communication of the policy and Genting SOP was conducted by GSOM during Morning Muster dated on 15/02/2022 and GSPE on 14/03/2022 attended by all staff and employees. Thus the Minor NCR is closed.</p>

Non-conformity			
NCR Ref #	1929260-202007-N5	Date Issued	04/07/2020
Due Date	01/06/2021	Date of nonconformity Closure	01/06/2021
Clause & Category (Critical / Minor)	5.2.2 RSPO P&C MYNI- 2019 (Minor)		
Statement of Nonconformity:	The livelihood improvement programmes for smallholders supplying FFB has yet to be developed.		
Requirement Reference:	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder or RSIS).		
Objective Evidence:	There is no evidence that the livelihood improvement programmes for smallholders supplying FFB has been developed by the certification unit.		
Corrections:	Sustainability Department Sabah to conduct training to GSOM and GSPE on the programmes for smallholders. GSOM & GSPE to carry out consultation with the smallholders, assess their needs & develop a support programme.		
Root Cause Analysis:	The programmes was not available yes as this is new requirements under RSPO P&C 2019. However, there are some efforts done by the estate and mill to fulfil this criteria, but it was not recorded/ documented accordingly such as Fertilizer credit and FFB quality awareness conducted with MPOB personnel.		
Corrective Actions:	All initiative related to supporting livelihood of the smallholders to be programme and documented accordingly. Training to be conducted to the estate and mill PIC.		

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Assessment Conclusion:	<p>The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.</p> <p>Verification R01: (Remote)</p> <p>Management and monitoring plans were implemented, reviewed and updated by each operating in a participatory through consultation with stakeholders and assistance by Sustainability Department personnel.</p> <p>The mill and estate established continuous Improvement plan with implementation as per following samples:</p> <p>Some document showed that Estate’s allowed neighbouring estate and smallholder to use the estate’s main road for transporting FFB to mill without any conditions and payment.</p> <p>Continue to inform neighbouring community for any job vacancy available in the estate.</p> <p>The evidence on stakeholder meeting to communicated regarding this programmed was available dated 9/9/2020. Thus Minor NC is closed.</p> <p>Verification R01: (Onsite)</p> <p>Stakeholder meeting has been conducted on 15/03/2022 to communicate livelihood development program to all smallholder and if there is any support required. It has been confirmed through interview with smallholder which confirmed that they are aware with the programme</p>
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Non-conformity			
NCR Ref #	1929260-202007-N6	Date Issued	04/07/2020
Due Date	01/06/2021	Date of nonconformity Closure	01/06/2021
Clause & Category (Critical / Minor)	6.5.3 RSPO P&C MYNI- 2019 (Minor)		
Statement of Nonconformity:	A new mother was not consulted on her needs by the Management.		
Requirement Reference:	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.		
Objective Evidence:	Employee No: 80001613 gave birth to her first child on 8 October 2019. However, Management has not been able to demonstrate that she was consulted on her needs as a new mother.		
Corrections:	SD to conduct training/briefing to the estate and mill PIC regarding this requirements as well as to provide the documented assessment on the new mother needs.		
Root Cause Analysis:	This is new requirements as per RSPO P&C 2019 and estate/mill PIC had not understand the requirements.		
Corrective Actions:	Sustainability Department will conduct proper training in future on any new certification standard requirements.		

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Assessment Conclusion:	<p>The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.</p> <p>Verification R01: (Remote)</p> <p>As verification, SD to conduct training/briefing to the estate and mill PIC regarding this requirements as well as to provide the documented assessment on the new mother needs. Latest was on 1/12/2020, the record available at site.</p> <p>Thus Minor NC is closed</p> <p>Verification R01: (Onsite)</p> <p>There is no new mother in Genting Sabapalm POM and it has been verified base on the records and interview with women workers. While for Genting Sabapalm Estate, monitoring of new mother has been done by hospital assistant where assessment has been done on 2nd week of deliver during the visit. Sample has been taken for mother name Reski Seri Rahayu Asri dated 08/11/2021</p>
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Non-conformity			
NCR Ref #	1929260-202007-N7	Date Issued	04/07/2020
Due Date	01/06/2021	Date of nonconformity Closure	01/06/2021
Clause & Category (Critical / Minor)	7.11.3 RSPO P&C MYNI-2019 (Minor)		
Statement of Nonconformity:	There was no evidence that the adjacent stakeholders were engaged in developing the fire prevention and control measures.		
Requirement Reference:	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.		
Objective Evidence:	Genting Sabapalm has drafted its fire prevention and control measures plan. However, there was no evidence that the adjacent stakeholders were engaged in developing it.		
Corrections:	Estate to identify the relevant/adjacent stakeholder and conduct briefing regarding this procedure.		
Root Cause Analysis:	The procedure was not communicated with the relevant stakeholders during the stakeholder meeting and no follow up action taken to inform regarding this procedure.		
Corrective Actions:	To include this procedure as an agenda during the stakeholder meeting.		
Assessment Conclusion:	<p>The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.</p> <p>Verification R01: (Remote)</p> <p>The unit certification already communicated using a Memo to all stakeholder on March 2021 regarding to its fire prevention and control measures. This progress was to replace the stakeholder meeting due to Covid 19 issue. Before this, management already conduct the stakeholder meeting on 9/9/2020 and on this meeting the management already communicate regarding this matter also. Thus Minor NC is closed.</p>		

	<p>Verification R01 (Onsite)</p> <p>The above-mentioned fire prevention and control measures were communicated to the stakeholders via providing the procedure to the identified stakeholders. The stakeholders have acknowledged received of the document and it was available for verification.</p>
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Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: 1929260-202007-I1 Indicator 2.1.1</p> <p>To ensure all workers that expose to noise (85-89dB or >90dB) are send for audiometric test as per recommendation (Report on Positive Initial Employee Noise Exposure Monitoring With Additional Areas dated 9 Oct 2012).</p> <p>Verification / Follow-up actions: Verification R01: Remote</p> <p>The management already send the workers to Audiometric test as per Noise Risk Assessment recommendation and as per result from the report form OHD all workers that involve was fit to work, for latest Audiometric test will be conducted on July 2021 as per OSH plan thus OFI was close accordingly.</p> <p>Verification R01 Onsite</p> <p>Audiometric Test was conducted in compliance with the recommendations in the NRA by Dab OH Sdn Bhd on 14/08/2021. A total of 19 workers were tested with the results stating that 18 workers were having normal audiogram and 1 worker with abnormal audiogram. The worker with abnormal audiogram has been retested on 10/01/2022 and the results stating the worker has conductive hearing loss.</p>
OFI 2	<p>OFI Statement: 1929260-202007-I2 Indicator 5.1.4</p> <p>The terms of fertilizer loan to the smallholders supplying FFB can be further improved by making the payment schedule more transparent and confidential.</p> <p>Verification / Follow-up actions:</p> <p>GSOM received crops from both own supply bases and external suppliers. For external FFB providers mainly among smallholders who doesn't want to sign any contract, an External Fresh Fruit Bunch (FFB) Procurement Policy Agreement were provided to them. The policy is fair, legal and transparent and have an agreed timeframe for payment.</p> <p>The policy agreement was signed by Senior Vice President Marketing Palm Products dated on 31/3/2021. For smallholders who requested loan assistance from GSOM in their fertilizer purchase, a term included in individual's records for repayment deduction from their monthly FFB payments.</p> <p>Agreed payments made in timely manner for sample sighted as following smallholder FFB supplier name: A Rahman Harry Bin Diong; FFB month: April 2021; Payment date: 10/5/2021 thus OFI was close accordingly.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1929260-202007-M1	Critical	2.3.1	09/07/2020	Closed out on 05/10/2020
1929260-202007-M2	Critical	4.1.1	09/07/2020	Closed out on 05/10/2020
1929260-202007-M3	Critical	6.2.3	09/07/2020	Closed out on 05/10/2020
1929260-202007-M4	Critical	6.5.2	09/07/2020	Closed out on 05/10/2020
1929260-202007-N1	Minor	1.1.5	09/07/2020	Closed out on 2/6/2021
1929260-202007-N2	Minor	3.3.2	09/07/2020	Closed out on 2/6/2021
1929260-202007-N3	Minor	3.4.2	09/07/2020	Closed out on 2/6/2021
1929260-202007-N4	Minor	3.5.1	09/07/2020	Closed out on 2/6/2021
1929260-202007-N5	Minor	5.2.2	09/07/2020	Closed out on 2/6/2021
1929260-202007-N6	Minor	6.5.3	09/07/2020	Closed out on 2/6/2021
1929260-202007-N7	Minor	7.11.3	09/07/2020	Closed out on 2/6/2021
2189110-202204-M1	Critical	2.1.1	15/04/2022	Closed out on 15/07/2022
2189110-202204-M2	Critical	3.6.1	15/04/2022	Closed out on 15/07/2022
2189110-202204-N1	Minor	2.2.2	15/04/2022	Open
2189110-202204-N2	Minor	2.2.3	15/04/2022	Open
2189110-202204-N3	Minor	3.4.2	15/04/2022	Open

3.4 Stakeholders and previous land owner / user consultation

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

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Government department	Sekolah Kebangsaan Ladang Sabapalm	Face to face
Contractor	Syarikat Tan Hong Transport	Face to face
Contractor	Palm Machinery Sdn Bhd	Face to face
NGO	HUMANA	Face to face
Government department	Balai Polis Tagas Tagas	Face to face
Communities/FFB supplier	Kampung Tagas Tagas	Face to face
Communities/FFB supplier	Kampung Tembandung	Face to face

Stakeholders comment	
1	<p>Feedbacks: Local communities (Kampung Tagas Tagas and Kampung Tembedung)</p> <p>Both head of village has been interviewed and most of the villagers are the FFB supplier to Genting Sabapalm POM. Base on interview, both of them are aware about RSPO certification and internal policy and procedure that has been communicated through stakeholder consultation in March 2022. There is no issues of land since clear demarcation has been established by the estate. Some issues have been raised</p> <ol style="list-style-type: none"> a. Minutes meeting need to be distributed to all FFB supplier especially for those who can't attend to ensure that all FFB supplier aware about agenda/issues that has been discussed during the meeting. b. Duration for FFB delivery sometimes has been limited from 9am to 12am especially during peak season. c. The villager requested the estate to repair road to their villages from estate. d. FFB pricing where different from the collection centre. <p>Audit Team verification and response:</p> <p>The management for both estate and POM will try to maintain good relationship with local surrounding and to ensure that disseminate all information requested, communication of the policy and procedure.</p> <ol style="list-style-type: none"> a. The management of POM noted with the issues. He informed that WhatsApp's group created between POM management and FFB supplier and will communicate the minute meeting and all information through the WhatsApp's group. b. POM manager said that they need to prioritize FFB from Genting Sabapalm Estate especially during peak crop production the avoid exceeding the mill capacity (20mt). Issues has been raised in social impact assessment and management plan has been established. Explanation on the issues done during the stakeholders meeting for FFB supplier. c. Estate noted and already received the request. The management will respond to the stakeholders to explain current issues. For now, road repairing process will be delayed since estate need to focus on repairing estate road due to good current weather condition. d. Explanation of FFB pricing has been done during the stakeholder meeting by the POM manager. FFB pricing for Genting Sabapalm POM will be set base on OER percentages awarded. POM

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	<p>manager noted with the issues and will further explain on FFB pricing using other channel and method.</p>
2	<p>Feedbacks: Contractor (Syarikat Tan Hong Transport, Palm Machinery Sdn Bhd, Hon Kim Enterprise, New Gen Sdn Bhd)</p> <p>All the contractor confirmed that the management and POM maintained good relationships with them and aware with policy and procedure of Genting Plantations Berhad. It has been confirmed that payment has been made in timely manner as per payment term stated in the contract agreement. One of the contractor requests for any contractor entering estate will not require to do RTK test for COVID 19 since incurred cost for the contractor.</p> <p>Audit Team verification and response:</p> <p>The management for both estate and POM will try to maintain good relationship with local surrounding and to ensure that disseminate all information requested, communication of the policy and procedure.</p> <p>Estate management responded for the request where unable to full fill the request since it is SOPs that has been practiced in both POM and estate as precaution to avoid any COVID 19 cases.</p>
3	<p>Feedbacks: School (SK Sabapalm and HUMANA)</p> <p>100% of Genting Sabapalm Estate and POM studied in SK Sabapalm and Humana. Headmaster of SK Sabapalm and HUMANA are satisfied and happy with contribution has been made by the estate to them. Renovation of SK Ladang Sabapalm has been done last year and improved the condition of the school. Communication between both parties has been done through the estate assistant manager who in charge on the facilities. Both requested for additional housing (SK Ladang Sabapalm requested for contractor workers works in as cleaner/gardener in the estate while HUMANA request additional house for married teacher)</p> <p>Audit Team verification and response:</p> <p>The management for both estate and POM will try to maintain good relationship with all school and HUMANA and will improve in communication between both parties. Regards to the request, the management unable to full fill the request since currently estate and POM is shortage of housing. Total 12 housing has been provided to SK Ladang Sabapalm and 1 house to HUMANA. Estate will look into if there any vacancy in the future.</p>
4	<p>Feedbacks: Balai Polis Tagas Tagas</p> <p>Stakeholder consultation has been attended by Koperal. He mentioned that Genting Sabapalm POM and estate is under the area of supervision of Balai Polis Tagas Tagas. He also mentioned that any written report need to be submitted to Balai Polis Beluran. As for now, good relationship has been maintained and a lots contribution has been made by estates to Balai Polis</p> <p>Audit Team verification and response:</p> <p>The management noted with the respond and will try to maintain good relationship with all government agencies.</p>
5	<p>Feedbacks: Children and Gender committee</p> <p>Chief of gender committee has been interviewed, Mdm Helena Bulukan and she has explained the objective establishment of the committee. Latest meeting has been done in February 2022 and main issues is communication of the policy and procedure, routine medical check-up for pregnant women. There is no prohibition by the management to organise any meeting or activities for the committee and there is specific budget has been allocated for any activities</p> <p>Audit Team verification and response:</p>

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	The management are aware with the important of the committee as one of the channel for communication for women workers. The management commit to give their support on activities and plan for the committee.
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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 Genting Sabapalm Certification Unit have already undergone 2nd Cycle of Replanting

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

3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

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

Report prepared by	Acceptance of Assessment Conclusion	Acceptance of Assessment Conclusion
Name: Mohd Razaleigh bin Mohamad	Name: Arunan Kandasamy	Name: James Chung Khim Hon
Company Name: BSI Malaysia Sdn Bhd	Company Name: Genting Plantations Berhad	Company Name: Genting Plantations Berhad
Title: Client Manager	Title: Senior Vice President - Plantation (Malaysia)	Title: Senior Vice President – Group Processing
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 18/08/2022	Date: 26/08/2022	Date: 26/08/2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>All documents required by this indicator are made publicly available to all stakeholders. Genting Plantations Berhad require them to fill in the Enquiry Register Book in order to access the documents. The Corporate Department will ensure that the requested documents made available do not impinge on confidentiality and will not cause detrimental sustainability or negative social outcomes.</p> <p>Records of sample notification letter sent to external stakeholders latest by Genting Sabapalm Estate (GSPE) dated 13/1/2021 and Genting Sabapalm Oil Mill (GSOM) dated 27/5/2021 indicated the type of public documents accessible are as following:</p> <ul style="list-style-type: none"> a. Land titles: including maps b. Sustainability policies: environmental, safety, etc. c. Reports: SIA, EIA, HCV etc. d. Improvement plans: continuous improvements etc. e. Procedures: requests & response, complaints & grievances etc. <p>Sustainability Report and Annual Report are published annually and made publicly available at website: www.gentingplantations.com.</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>There is evidence that information has been provided in appropriate languages which are Bahasa Malaysia and English.</p>	Complied

1.1.3	<p>(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p>Any information request has been maintained in the specific filed and has been remark date receive and comment by the manager for next arrangement. Sample has been taken for water request from Tagas Tagas Police station on 25/01/2022 and 05/02/2022 through letter.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -</p>	<p>Consultation and communication procedure documented in document number SMP-GPB-17 issuance date 23/02/2018 title Procedure for consultation and communication. Stated in the procedure, 2 ways communications will be done at least 6 months once during the stakeholders' consultation or through the manager for each operating unit. Communication of the procedure has been done during the stakeholder meeting on 15/03/2022 with attendance of several stakeholder. As per interview, it has been confirmed that the stakeholder aware with the procedure where they can communicate with the management through different channel which are face to face, written form, telephone or email</p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -</p>	<p>List of stakeholders for Genting Sabapalm POM updated in February 2022 and as per social management plan will be updated on annual basis. List of stakeholders has been categories for few different categories which contracted parties, villages, government agencies, and FFB supplier.</p> <p>While for Genting Sabapalm Estate, list of stakeholders has been classified into 2 which are external and internal stakeholder. For internal stakeholder mainly consist of nearby smallholder, contractor, religion bodies and supplier.</p> <p>Details of information included name of the company, address, phone number and contact persons.</p>	Complied

Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.

1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>Genting Plantations Berhad has developed Ethical Conduct and Integrity Policy dated 22/6/2015, is committed to conducting its business professionally, ethically and with the highest standard of integrity. The following values need to be followed by all the employees:</p> <ul style="list-style-type: none"> a) Respect for fair conduct of business b) Refrain from all forms of corruption, bribery and fraudulent use of funds and resources c) Respect and protect confidential and/ or privileged information to which we have access in the course of our duties <p>All the contractors and workers have been briefed on the policy during induction training once arrived at the mill. Seen the Induction Book and sighted the contractors. Visitors and new recruited workers have attended the induction training.</p> <p>Additionally, there's Genting Plantations Berhad Anti-Bribery and Corruption System Manual; Rev. # 0; Effective date: 1/6/2020 since the Group practices a zero-tolerance approach against all forms of bribery and corruption and upholds all applicable laws in relation to anti-bribery and corruption.</p>	Complied
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>All employees of mill and estate were given the Code of Ethics & Conduct handbook and signed the letter of declaration to comply with the requirements. Individual performance for compliance of policy implementation were monitored by immediate superior and assessed during annual appraisal program.</p> <p>The policy also extended to external stakeholders mainly among suppliers and contractors which requires them to sign the Third-Party Acknowledgement Letter as per sample sighted in Genting Sabapalm POM</p>	Complied

		Internal audit has been conducted as part of mechanism to monitor compliance and the implementation of the policy. Latest internal audit has been carried out on 14-15/03/2022 where there is no issues on code of ethical conduct has been raised. Other than that, the management will react base on the Whistle-blower policy dated 01/06/2020 for any stakeholder to report any unethical misconduct.	
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	<p>All legal requirement has documented in Legal Requirement Register (SMP-GPB-22) Rev.15 dated Jan-Mac 2022.</p> <p>Sighted the sampled evidence of compliancy to the legal and other requirement as follows:</p> <p>Genting Sabapalm Oil Mill</p> <ul style="list-style-type: none"> • MPOB License No. 620051004000 for Genting Sabapalm Oil Mill valid from 01/03/22-28/02/23. • Weighbridge certificate by under Akta Timbang dan Sukat 1972 and Peraturan Timbang dan Sukat 1981, done by Metrology Corporation Malaysia under no B1626317 (Equipment No. 113650708) and B162150256 (Equipment No. 162150256) valid until dated 10/07/22. • Power Generation License (Form F) from Suruhanjaya Tenaga under Electrical Services Act 1990 for 4 units of gensets (Serial No. 49194, Mitsubishi, Turbine Genset 1, Turbine Genset 2) with total power aggregate: 1810 kWh, valid from 22/03/22-21/03/23. • The Genset having Written Approval of Written Notification under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014. 	Non-compliance

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		<ul style="list-style-type: none"> • Diesel Permit Ref No. KPDHEP.SDN.18/2021(SK) for Genting Oil Mill (Sabah) Sdn Bhd located at Genting Sabapalm Oil Mill valid from 30/09/21-29/09/24. • Fire Certificate No. JBPM:SB/7/180/2021 for Genting Sabapalm Oil Mill valid from 29/10/21-28/10/22. • JTK Permit for hiring foreign workers under Section 118 Sabah Labor Ordinance (Sabah Bab 67). Semenanjung : 1, Indonesian: 16 • JTK Permit for restriction of overtime more than 120 hours. Valid from 27/08/20-26/08/22. • JTK Permit for Lady working at night under Section 75 Sabah Labor Ordinance (Sabah Bab 67) vais from 26/08/20-25/08/22. • JTK Permit for deduction of salary under Section 113(4) Sabah Labor Ordinance (Sabah Bab 67) for Passport Payment valid from 30/06/21-29/06/23. • An Instruction Notice (Notis Arahan) under Section 31(1) of Environmental Quality Act 1974 received by Genting Sabapalam Oil Mill dated 18/01/22 from DOE Sabah. Required to send feedback with evidence of action within 2 weeks from the notice. Failed to comply with Terms of License (005261): <ul style="list-style-type: none"> - No. 11: effluent pond no anaerobic 1 & 2 full with suspended solid and freeboard less than 0.5 M potentially effecting the capability of effluent treatment pond. (Action Required desludging, apply for approval and enhance pond's bank to ensure freeboard not less than 0.5m - within 3 weeks of the notice) - No. 20: empty/used paint containers and empty/used gallon hexane at scheduled waste store not properly labelled as per 	
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		<p>SW Regulations 2005. (Action Required to prevent pollution in handling and comply with SW Regulations 2005 – immediately</p> <ul style="list-style-type: none"> - No. 22: not appointing Registered Environmental Auditor yet. (Action Required to prevent pollution and appoint Registered DOE Auditor to conduct Environmental Audit at least 2 times a year – within 4 weeks from the notice). - Feedback letter was sent to DOE on 04/02/22 as required accordingly. <p>Genting Sabapalm Estate has maintained List of Applicable License and Permit as at March 2022y:</p> <ul style="list-style-type: none"> • MPOB license 523495002000 for 4,360.33 Ha valid until 30/09/2022 • Permit No. KPDNKK.SDK-100/2021(PK) from KPDNKK Sandakan for Ron 95 wit quantity of 200 litres valid till 16/10/22. • Certificate of Fitness for Air compressor SB PMT 10434 valid until 07/05/22 • License for Air compressor SB PMT 80900 valid until 7/5/2022 • Certificate of Fitness for Air Compressor SB PMT 80900 valid till 07/05/22 • JTK Permit to Hire Foreign Workers (JTK.H.SDK.600-4/1/1/01261/005604) valid until 01/10/22. <p>JTK license for wages deduction (600- 1/2/8/229(11/SDK/2020-0339) valid until 26/12/23.</p> <p>Major NC#2189110-202204-M1</p> <ol style="list-style-type: none"> 1. No Written Notification to DOE under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 for one unit of Fume Hood located in Laboratory of Genting Sabapalm Oil Mill. 	
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		<p>2. Compliance Audit by DOE Registered Environmental Audit to conduct compliance audit at least 2 times a year as required by DOE License No. 005261 for period of 01/07/21-30/06/22 has not been conducted yet. This was also highlighted in Notis Arahan under Section 31(1) Environmental Quality Act 1974 to be done within 4 weeks from the notice dated 18/01/22 from DOE Sabah</p> <p>3. Sample of punch card has been taken for August, November 2021 and February 2022, and found out that 2 women workers (employment number E00606 and E11334) has been working more than 10pm for date as follow</p> <table border="1" data-bbox="1137 730 1758 914"> <tr> <td>E00606</td> <td>09/08/2021</td> <td>23.52</td> </tr> <tr> <td></td> <td>15/08/2021</td> <td>00.28</td> </tr> <tr> <td>E11334</td> <td>13/08/2021</td> <td>23.28</td> </tr> <tr> <td></td> <td>16/08/2021</td> <td>23.02</td> </tr> </table> <p>However, Genting Sabapalm Estate did not require the Woman Working at Night Permit from Sabah Labor Department</p>	E00606	09/08/2021	23.52		15/08/2021	00.28	E11334	13/08/2021	23.28		16/08/2021	23.02	
E00606	09/08/2021	23.52													
	15/08/2021	00.28													
E11334	13/08/2021	23.28													
	16/08/2021	23.02													
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>Sighted a legal requirement has documented in Legal Requirement Register (SMP-GPB-22) Rev.15 dated Jan-Mac 2022. Sighted the updating of legal and other requirements has been properly tracked on changes such as:</p> <ul style="list-style-type: none"> The revoked Factories and Machinery (Noise Exposure) Regulations 1989 still not removed and status of compliance recorded. Replaced by Occupational Safety and Health (Noise Exposure) Regulations 2019 <p>Sighted in Genting Sabapalm Estate a list of Applicable Laws to Sabah Operation. Also an updated on 08/09/20 of Master list of Legal Requirements & Best Practices Applicable to Plantation</p>	Complied												

		Operation in Malaysia. Also established and documented Legal Requirements Register (LRR) (SMP-GPB-22) Rev. 09 dated October 2020.	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	Total 82 boundary stone has been established in the estate area which has been divided into 2 division. Genting Sabapalm POM located inside the estate area. Coordinate of sample of boundary stone as per below <ul style="list-style-type: none"> a. 5.940882N, 117.35631E b. 5.903694N 117.3889E Pegging has been done with pole for those boundary stone that has not been identified.	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	A list of contracted parties is maintained. - Minor compliance -	List of contracted parties for Sabapalm POM sighted in the list stakeholders that has been updated on February 2022 for CPO and PK transporter (3 contractors) and earth work contractor (5 contractors). For earth works contractor, contractors has been appointed as labour quarters construction works (New Gen contractor) , belt press maintenance (Bumi Aktif Engineering). While for Genting Sabapalm Estate, list contracted parties has been maintained in contractor list. Total 6 contractor has been list which mainly for FFB transport contractor and grocery/canteen	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	3 contract agreements of the contractor for both Genting Sabapalm POM and Estate has been verified as per below <ul style="list-style-type: none"> a. Landasan Kembar Sdn Bhd b. Bumi Aktif Engineering c. New Gen Contractor d. Syarikat Tan Hong Transport 	Non-compliance

		<p>e. Hon Kim Enteprise</p> <p>Stated in the contract agreement that all contractor need to comply with legal requirement and company policies, no forced, trafficked, pay living wages as per legal requirement and no child labour.</p> <p>Total 238 smallholders listed in the list of stakeholders for both active and inactive supplier. 5 samples has been taken and confirmed there no specific clause for legal requirement compliance. Sample as per below</p> <ul style="list-style-type: none"> a. Saharomdin Bin Satirudin b. Kamsal bin Sala c. Amin bin Tabinga d. Ismail bin Jahari e. Julkarnain Ahmad <p>Minor Non conformities#2189110-202204-N1</p> <p><u>Genting Sabapalm POM</u></p> <p>Total 238 smallholders listed in the list of stakeholders for both active and inactive supplier. Samples of agreement have been taken and verified. However, the agreement did not contain on meeting applicable legal requirements.</p> <p><u>Genting Sabapalm Estate</u></p> <p>There are 4 canteen/grocery store operated in the Genting Sabapalm Estate line sites and has been included in the stakeholders list.</p> <p>However, it has been sighted that the shop operates using business licenses for another shop in Telupid Town. It also sighted that; the</p>	
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		shop sells LPG gas to workers without any permit and in compliance with Akta Kawalan Bekalan 1961 . The contractor unable to demonstrate compliance to legal requirement, thus, non-conformities has been raised	
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>3 contract agreements of the contractor has been verified as per below</p> <ul style="list-style-type: none"> a. Landasan Kembar Sdn Bhd b. Bumi Aktif Engineering c. New Gen Contractor <p>Stated in the contract agreement that all contractor need to comply with legal requirement and company policies, no forced, trafficked, pay living wages as per legal requirement and no child labour.</p> <p>Total 238 smallholders listed in the list of stakeholders for both active and inactive supplier. 5 samples has been taken and confirmed there no specific clause contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. Sample as per below</p> <ul style="list-style-type: none"> a. Saharomdin Bin Satirudin b. Kamsal bin Sala c. Amin bin Tabinga d. Ismail bin Jahari e. Julkarnain Ahmad <p>Minor Nonconformities#2189110-202204-N2 Genting Sabapalm POM</p> <p>Total 238 smallholders listed in the list of stakeholders for both active and inactive supplier. Samples of agreement have been taken</p>	Non-compliance

		and verified. However, the agreement did not contain clauses disallowing child, forced and trafficked labour.	
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>A list of all directly sourced FFB is available for verification in the Genting Sabapalm Oil Mill List of Stakeholder – FFB Supplier. It has the information about names of the suppliers, MPOB License number, geo-location and the status of the third party FFB suppliers land ownership.</p> <p>Genting Sabapalm receives RSPO certified FFB from its own estates which is Genting Sabapalm Estate. The mill also receives non-certified FFB from 238 estate, traders and smallholders registered from outside the certification scope. The information related to the third party FFB suppliers were available and sampled as below:</p> <ol style="list-style-type: none"> 1. <u>Rosnah Binti Abdul Rshid</u> <ul style="list-style-type: none"> – MPOB License; License Number: 476830101000; Land Area: 6.07 Ha; License Validity Period: 01/10/2021 – 30/09/2026. – Good Receive Advice; Ticket Number: FFB22003238W; Date: 19/03/2022; Product: FFB; Weight: 900 Kg. 2. <u>Jenita Binti Rusing</u> <ul style="list-style-type: none"> – MPOB License; License Number: 769188001014; Land Area: 6.07 Ha; License Validity Period: 25/05/2019 – 30/04/2024. – Good Receive Advice; Ticket Number: FFB22003485W; Date: 24/03/2022; Product: FFB; Weight: 1,740 Kg. 3. <u>Dragon Villa Sdn Bhd</u> 	Complied

		<ul style="list-style-type: none"> - MPOB License; License Number: 618564002000; Land Area: 254.73 Ha; License Validity Period: 01/08/2021 – 31/07/2022. - FFB Delivery Advice; Document Number: 1519; Delivery Date: 22/02/2022. - Good Receive Advice; Ticket Number: FFB22002074W; Date: 22/02/2022; Product: FFB; Weight: 9,530 Kg. <p>4. <u>Styland Corporation Sdn Bhd</u></p> <ul style="list-style-type: none"> - MPOB License; License Number: 503461502000; Land Area: 2649.33 Ha; License Validity Period: 01/03/2022 – 28/02/2023. - Good Receive Advice; Ticket Number: FFB22003235W; Date: 18/03/2022; Product: FFB; Weight: 1620 Kg. 	
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>At the moment the mill does not receive any indirectly sourced FFB. All FFB are sent directly from estates or smallholders. Therefore, this indicator is not applicable during this assessment.</p>	Not Applicable
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p><u>Genting Sabapalm Oil Mill</u></p> <p>Genting Sabapalm Oil Mill have established a management plan with 5-year projection plan (2022 to 2026). The palm oil mill budget includes the projected FFB processed, CPO and PK production, OER and KER, production cost, training, insurance, environment conservation.</p> <p><u>Genting Sabapalm Estate</u></p>	Complied

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		Estate have the management plan for FY22/23 with 5-year projection plan for (2022 to 2026) which includes on Replanting Area, Replanting Expenditure, Plant machinery, Road & Bridges and Capital Expenditures amongst others.											
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	The replanting programs for the Genting Sabapalm Estate are compiled as follows. The program is reviewable on an annual basis which is subject to amendment. All figures in hectares otherwise stated. <table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td>2022</td> <td>2023</td> <td>2024</td> <td>2025</td> <td>2026</td> </tr> <tr> <td>200.79</td> <td>193.44</td> <td>238.28</td> <td>186.69</td> <td>-</td> </tr> </table>	2022	2023	2024	2025	2026	200.79	193.44	238.28	186.69	-	Complied
2022	2023	2024	2025	2026									
200.79	193.44	238.28	186.69	-									
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	Management review was conducted for the mill and estate to address the internal audit findings among others. The management review meeting minutes was available for verification. The RSPO P&C Management Meeting was conducted simultaneously for the whole certification unit at the mill on 08/04/2022 chaired by the Sr. Estate Management. The RSPO SCCS Management Review Meeting Minutes was conducted at the mill on 08/04/2022.	Complied										
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.													
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -	Continuous Improvement Plan for Genting Sabapalm Oil Mill dated 28/02/22, signed by Mill Manager. This was based from Environmental Impact as mentioned. Objectives: To improve on environmental aspect and impact assessment and risk control. Action plan a) to regular monitoring of water quality.	Complied										

		<ul style="list-style-type: none"> b) Take necessary action when poor water quality. c) To receive and act on any environmental complaints through internal and external communication. d) Action Plan e) Carry out stakeholder meeting as per schedule f) Briefing to all workers. g) Maximizing recycling and minimizing waste or by-products generation. h) Action Plan i) Create Awareness through recycling programmes j) Install recycling bins k) Recording of recycling waste. l) Continue make full use of biomass wastages by estate. m) Action Plan n) Stack fronds as per company SOP. o) EFB application p) POME land application q) Bunch ash. 	
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.</p>	<p>RSPO metric template version 2.1 is used for the reporting of Genting Sabapalm Certification Unit’s metrics (economic, social and environment). Data reporting period is January to December 2021 for (social and environment metrics) and economic metrics from January to December 2021 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p>	Complied

	<p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>		
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
<p>3.3.1</p>	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm Oil Mill and the estate are guided by a number of SOPs that have been established for standardization as well as to ensure implementations and operations are in accordance with the legal requirements and best practises. The following manuals were available for verification.</p> <p><u>Genting Sabapalm Oil Mill</u></p> <ul style="list-style-type: none"> a) Genting Plantations Berhad; Control of Document; Doc Number: SMP-GPB-01; Issue Date: August 2013 Revision: 00. b) Genting Plantations Berhad; Complaints and Grievances; Doc Number: SMP-GPB-19; Issue Date: March 2020; Revision: 04. c) Genting Plantations Berhad; Sustainability Internal Audit; Doc Number: SMP-GPM-03; Issue Date August 2021; Revision: 06. d) Genting Plantations Berhad; Supply Chain and Traceability (Palm Oil Mill); Doc Number: SMP-GPM-23; Issue Date: February 2022; Revision: 13. <p><u>Genting Sabapalm Estates</u></p> <ul style="list-style-type: none"> 1. Standard Operating Procedures (SOP); Genting Sabah Estates; Revision 3; Dated: 11/10/2013 has been established. Among the subcategorises available were: <ul style="list-style-type: none"> a) Chemical, Lubricant and Fertilizer Handling and Management 	<p>Complied</p>

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		<ul style="list-style-type: none"> b) Trunk Injection – Bagworm c) Rat Bait Application d) Manuring e) Harvesting f) Vehicle and Heavy Machineries g) Workshop h) Water Treatment i) General <p>2. Manual Keselamatan & Kesehatan Pekerjaan (OSH Manual/OM); Effective: 01/01/2016.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>Internal audits were conducted by Genting Sustainability Department to confirm consistent implementation of SOPs. During mill and estates visit it was noted that that operating parameters were consistently recorded by the operators. Internal Audit records were available for verification as below:</p> <p><u>Genting Sabapalm Oil Mill</u></p> <ul style="list-style-type: none"> 1. Internal Audit (RSPO P&C 2019) was conducted on 16 – 17/03/2022 by the Sustainability Manager. During the internal audit, 3 Observations and 2 OFIs were raised on the RSPO P&C Standard. 2. Internal Audit (RSPO SCCS) was conducted on 16 – 17/03/2022 by the Sustainability Manager. During the internal audit, 2 OFIs was raised on the RSPO SCCS standard. <p><u>Genting Sabapalm Estate</u></p> <ul style="list-style-type: none"> 1. RSPO Internal Audit was conducted to check consistent implementation of RSPO related procedures in the estate. The 	Complied

		Internal Audit was conducted on 25/03/2022 by the Sustainability Executive and Safety Officer.	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	The monitoring of the SOP implementation was implemented through all levels of the supervisory personnel with records maintained and verified. Among others the records are: <ul style="list-style-type: none"> a) Daily production/work records for the core activities at the estates and mill b) Field Costing Books c) Monthly Chemical Consumption Record d) Mature/immature field work program e) Fertilizer application Records f) Herbicide Work Program g) Rat Baiting Census Records h) Harvesting Standard Checklist i) Worksite Inspection Form 	Complied
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			

<p>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>Social management and monitoring plan, procedure and responsibilities for implementation established and updated on 07/04/2022. Stated in the procedure that social impact assessment will be done every 5 years and stakeholders meeting and stakeholder list will be updated/done at least once a year.</p> <p>Social impact assessment for both Genting Sabapalm POM and estates on 17-21/06/2019, 3rd revision prepared by sustainability department in August 2019 and conducted by Mr Pawatang Pamalu. The methodology of the assessment is based on consultation with random stakeholders which the main objective is for information collection for both social and environmental issues. 6 categories of stakeholder have been interviewed which are local workers, foreign workers, various ages of workers, contractor, villagers and government officer.</p> <p>Input of the assessment has been recorded in the same report which most of the feedback from external stakeholders recorded as positive inputs. There is one issues negative issues that has been categorize as negative which from FFB supplier. The FFB supplier are worried if Genting Sabapalm POM stop receiving outside FFB can increase of operation where nearest FFB collection centre located 15-20km from the smallholders.</p> <p>Interview with the smallholders by the auditor captured the same issues where the smallholders mentioned that duration of FFB deliver has been reduced.</p> <p>While for internal stakeholders, there is only one negative impact has been identified which related to workers are not aware/understand the process to apply birth certificate for foreign workers dependent.</p>	<p>Complied</p>
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		<p>The Genting Sabapalm Oil Mill has conducted Environmental Aspect Impact analysis to identify the impact of mill activities to the environment operation.</p> <p>Environmental Management Plan has been established based on the significant impact identified. The Environmental Aspect and Impact Assessment (SP-MGR-02-F01-00) issued date 01/03/22. Among included:</p> <ul style="list-style-type: none"> a) Office and Security b) Mill Compound c) FFB Reception. d) Sterilizer e) Threshing f) Pressing. g) Clarification h) Raw water Treatment i) Laboratory j) Workshop and etc. <p>The Stakeholder Consultation was conducted on 15/03/22 at Club House. The minutes of meeting with attendance of mill representatives (Manager, Sr. Asst Manager, Assistant Manager, Document Controller). While stakeholder included Kg Klagan Community Head, S.K Ladang Sabapalm, Kg. Tembidong Bidong Head, Kg. Tagas-Tagas Head, Humana and etc.</p> <p>There's no new planting in all estates within GSOM Certification Unit. For existing operations, each operating unit developed a Social and Environmental Impact Assessments with assistance by the Sustainability Department.</p>	
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<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>The environmental management plan was established based on Environmental Aspect Impact analysis and documented in Environmental Improvement and Management Plan 2022. The plan was implemented to monitor the effectiveness of the mitigation measures. The plan covers the source of impact, negative impact, improvement/mitigation plan, date required, monitoring and action plan, PIC, timeline and status. The plan was reviewed on annual basis. Latest review was conducted on March 2022.</p> <p>Environmental Aspect and Impact Assessment (EAI) was updated on 08/02/2022. Sighted the construction of New Linesite at Sapi Division, Genting Sabapalm Estate. Nevertheless, the Social and Environmental Aspects and Impacts were not identified in the EAI.</p> <p>The HCV Management Plan have been established. Nevertheless, the HCV Management and Monitoring Plan have not identified the Bangkawat River Buffer zone as an area to be conserved. Visit to the area indicated that there were no clear establishment of buffer zones along the river areas and operational works were ongoing as normal.</p> <p>Minor Non conformities#2189110-202204-N3</p> <ol style="list-style-type: none"> 1. Environmental Aspect and Impact Assessment (EAI) was updated on 08/02/2022. Sighted the construction of New Linesite at Sapi Division, Genting Sabapalm Estate. Nevertheless, the Social and Environmental Aspects and Impacts were not identified in the EAI. 2. The HCV Management Plan have been established. Nevertheless, the HCV Management and Monitoring Plan have not identified the Bangkawat River Buffer zone as an area to be conserved. Visit to the area indicated that there were no 	<p>Non-compliance</p>
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		<p>clear establishment of buffer zones along the river areas and operational works were ongoing as normal.</p> <p>3. Recommendation of the negative issues that has been highlighted has been stated in the same document Social impact assessment report. Stated in the recommendation for that issues are to communicate the issues during the committee meeting and explanation on the process of application. However, there is no evidence management plan has been developed in participatory ways and monitoring plan has been established. Thus, non-conformities have been raised.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Management and monitoring plans were implemented, reviewed and updated by each operating in a participatory through consultation with stakeholders and assistance by Sustainability Department personnel. The mill and estate established continuous Improvement plan with implementation as per following samples:</p> <ul style="list-style-type: none"> a. To maintain buffer/riparian zone b. To promote waste recycling c. To conduct gender committee meeting regularly d. To provide CSR to local communities and workers 	Complied
<p>Criterion 3.5: A system for managing human resources is in place.</p>			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>Genting Plantations Berhad has developed Foreign Workers Recruitment Procedure (Doc. No.: GEN-13, Rev. 02 dated 09/11/2020) to establish control procedures on the employment of foreign workers. Recruitment, selection and termination/retirements process was clearly outlined in the procedure.</p> <p>Local Recruitment Procedure was established as well in the company. Besides, criteria for promotion was outlined in</p>	Complied

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		<p>Procedures for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021).</p> <p>Procedure Manual of Manpower Recruitment and Orientation; Doc. # PM-MR-02; Rev. 00; Issue date: 2/1/2018 for recruitment, selection, hiring, promotion, retirement and termination and made available to the workers.</p> <p>The procedure is written in Bahasa and English language that can be easily understood by all levels of its employees. This policy is displayed at the offices and on notice boards.</p> <p>Latest communication of the policy and Genting SOP was conducted by GSOM during Morning Muster dated on 15/02/2022 and GSPE on 14/03/2022 attended by all staff and employees.</p> <p>As per interview with the workers, there is evidence that they are aware about the procedure and understand process as per stated in the procedure.</p>	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>For employment of foreign workers, this will be handling through Human Resource Department in HQ. There was no recruitment of foreign workers since last audit.</p> <p>The employment of local workers was through advertisement and word of mouth. They published the banner/ signboard of vacancy at the main road of the entrance. Besides, the management also informed workers/ staffs/ head of local communities if there is any vacancy available. Seen the sample of job vacancy advertisement. Criteria and benefits were stated in the banner. Reviewed the records of employment such as application for employment, interview form, employment letter, pre-employment medical check-up and copied of identification card was available.</p>	Complied
<p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			

<p>3.6.1</p>	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -</p>	<p><u>Genting Sabapalm Oil Mill</u> Genting Sabapalm Oil Mill have implemented a Safety & Health Management Plan for the year 2022 and available for verification. Among the objectives are to provide and maintain a working environment that is safe without risk to health and adequate as regard to welfare at work. Risk assessments were identified and assessed in the mill for all operations and as legal compliances. Verification were done as below:</p> <ol style="list-style-type: none"> 1. Hazard Identification, Risk Assessment and Risk Control (HIRARC) was established to assess all hazards and risk related to operations in the mill. Among the HIRARC verified were Sterilizer, Excavator Driver, Water Treatment Plant, Workshop and Engine Room. 2. Chemical Health Risk Assessment (CHRA) was conducted in compliance with OSHA Act 1994 and USECHH, 2000 for Genting Sabapalm Oil Mill by Rehpro Scientific Sdn Bhd on 23/11/2020. The CHRA Report (Report Reference Number: RSSB/CHRA/2020-038) was available for verification. 3. Annual Medical Surveillance was conducted in accordance with recommendations stated in the CHRA for workers exposed to chemicals listed under USECHH 200 Regulations such as Welding Fumes, Hexane and Diesel. A total of 11 workers were deemed to be exposed and results indicated that there were no occupational caused abnormal results. 4. Noise Risk Assessment (NRA) was conducted as part of the OSH (Noise Exposure) Regulations 2019 for Genting Sabapalm Oil Mill by Sherman Services & Supply on 15 – 16/04/2021. The NRA Report (Report Reference Number: SSS/NOISE-301/21) was available for verification. 	<p>Non-compliance</p>
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		<p>5. Audiometric Test was conducted in compliance with the recommendations in the NRA by Dab OH Sdn Bhd on 14/08/2021. A total of 19 workers were tested with the results stating that 18 workers were having normal audiogram and 1 worker with abnormal audiogram. The worker with abnormal audiogram has been retested on 10/01/2022 and the results stating the worker has conductive hearing loss.</p> <p><u>Genting Sabapalm Estate</u></p> <p>Genting Sabahpalm Estate has conducted and updated hazard identification and risk assessment as evidence sighted in HIRARC dated 25/01/22.</p> <p>The methodology for identification, assessment and control measure were explained. Estate to enhance HIRAC Form by considering information of current risk control first before analysis of risk (likelihood X Severity) as it will provide early information on the scale of likehood. Sampled HIRARC Checklist sighted activities in estate operation listed. Sampled activity No. 25 Clinic which last reviewed on 16/03/18. The risk related to Covid-19 such as risk to Hospital Assistant (HA) and her assistant while handling patients, conducting RTK Test, handling and disposal of RTK Test Kits to be further considered if pandemic status remains.</p> <p>Assessment for chemical (CHRA) already been conducted by QMSPRO Sdn Bhd (HQ/07/ASS/00/236) on 31 Oct 2019 and some amended supplementary on February 2020 (JKKP HQ/03/ASS/00/154-2020/021) for G-Planter Sdn Bhd. The other risk assessment been conducted by estate was Noise risk assessment (JKKP No:-SB/06/04/700) by Dr. Mohd Azizan from DAB OH dated 1/4/2021. From the assessment the management needed to do audiometry test and annual training for operation</p>	
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		<p>such as farm tractor, grass cutter activity, superbull driver and others.</p> <p>For all operation in estate, the risk and hazard already been assessed and recorded under HIRARC. Latest was done on 25/01/22</p> <p>Initial Risk Assessment was conducted by Dr. Azizan (HQ/18/PEB/00/00024) on 01/04/21.</p> <p>Major Non conformities#2189110-202204-M2</p> <ol style="list-style-type: none"> 1. The hazard risk of exposure to children living adjacent to construction activity of 4 blocks of housing of Genting Sabapalm Oill Mill found not adequately controlled as no fencing/barricade and safety warning signage posted to avoid any unauthorised entrance and potential accident. 2. The risk and exposure of clinic staff to Covid-19 from activity of handling workers with symptoms, suspected patients and testing and disposal RTK Test Kits not identified and updated as verified from HIRARC Checklist and activity No. 25 Clinic, which was last reviewed on 16/03/18. 3. While returning back from site visit sighted Mini/Midi Tractor Graber travelling on the road with grabber part hanging and swinging on the side of the road, hazardous to other traffic user. Further sampling on HIRAR Form N0. 42 dated 16/03/18 found the condition not identified and assessed for Mini/Midi Tractor Graber and no specific Safe Operation Procedure. 	
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>Available at Genting Sabahpalm Estate, Safety and Health Management Plan 2022. Included Training planned, Accident and incident statistics action plan, HIRARC include new operation of water treatment plant.</p> <p>Available OSH Action Plan and Strategies covering:</p>	Complied

		<ul style="list-style-type: none"> a) Agrochemicals on plantation. b) Oil palm harvesting operation. c) Machine operators (farm tractor). d) FFB Lorry driver. e) Vehicle driving/machine handling. f) Workshop operation. g) Usage of PPE h) Thorn prick. <p>The effectiveness of the Safety & Health Management Plan is monitored and ensured through checklist, worksite inspections and trainings that were conducted by Genting Sabapalm Oil Mill and Genting Sabapalm Estate in each of the operations. Site visits around the mill and estate indicated the control measures as per HIRARC were followed and ensured by the respective management units.</p>	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<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. - Critical (Major) compliance -</p>	<p>As sampled in Sabapalm Oil Mill, the Training Needs Analysis for year 2022 and training plan was available for each section and verified as Training Scheduled FY 2022.</p> <ul style="list-style-type: none"> a) QESH Policy, Sustainability Policy (20/01/22) b) Procedure of Handling New workers, contractor and visitor (June) c) ESH Committee and Environmental Committee (23/03/22) d) Chemical Management & Emergency Action, Emergency Response Plan, Fire Fighting and Evacuation, First Aid (11/03/22 & 12/03/22) e) PPE Training (04/04/22) 	<p>Complied</p>

		<p>f) Recycling Awareness (20/01/22) g) Zero burning 920/01/22).</p> <p>This training plan included safety, environment, supply chain, social and work specialist needed. Sighted Sustainability Annual Programme Year 2022. As planned included:</p> <ul style="list-style-type: none"> a) Internal stakeholder meeting b) External stakeholder meeting c) Workers committee meeting d) Water Sampling, Scheduled waste disposal. e) OSH Committee training f) Environment committee meeting. <p>Sighted in Genting Sabapalm Estate a Workers Training Programme 2022. The programme contained information on training to be conducted, the targeted participant among various level of employees, date to be held (Jan-Dec). Among others included:</p> <ul style="list-style-type: none"> a) Safe driving of vehicles (lorry, excavator, tractor, lorry) (08/04/22) b) Spraying Training (31/03/22) c) Manuring Training (18/03/22) d) Harvesting Training (10/03/22) e) Safety and Health (PPE, ERP) (23/03/22) f) Upkeep and maintenance (08/04/22) g) FFB Gredding (10/02/22) h) Operation of Water Treatment Plant (08/04/22) i) 1st Aid Box Training (16/03/22) 	
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		<ul style="list-style-type: none"> j) Working at Height (06/04/22) k) Scheduled Waste Handling (22/06/22) l) Hirarc Training (23/06/22) m) Traceability Training (17/03/22) n) Awareness on recycling, RTE, RSPO, MSPO, ISCC and company policy (11/03/22) o) Road Safety Campaign and ect (26/3/22) 	
<p>3.7.2</p>	<p>Records of training are maintained. - Minor Compliance -</p>	<p>The training record was available in record, sampling the record of training as per below:- <u>Genting Sabapalm POM</u></p> <ul style="list-style-type: none"> a) Handling of tools & equipment/Permit to Work conducted on 04/04/22 and attended by 11 Workshop employees. b) PPE Training conducted on 04/04/22 and attended by 12 Workshop employees. c) First Aid Training was conducted on 25/02/22 by DAB O.H d) QESH Policy, RSPO & MSPO Policy, Recycling, Zero Burning conducted on 20/01/22 and attended by 71 employees during morning muster. e) ESH Committee Training was conducted on 23/03/22 and attended by 15 employees. f) Careline (Sabah) and email address conducted during morning muster on 26/03/22 and attended by 72 employees. <p><u>Genting Sabapalm Estate</u> Genting Sabapalm Estate has maintained records such as attendance list, photo of training conducted as sighted in a File of Training Record:</p> <ul style="list-style-type: none"> a) Date Training on 6/4/2021 	<p>Complied</p>

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		<ul style="list-style-type: none"> b) Company Policy on 13/3/2021 c) Harvesting and pruning on 20/3/2021 d) Spraying training on 25/3/2021 e) Welding training on 12/4/2021 f) Scheduled waste Training on 12/3/2021 g) Riparian buffer zone training on 15/3/2021 h) Vehicle handling and Driving training on 08.04/22 i) Spraying Training on 31/03/22 j) Firefighting Training on 23/02/22 k) Maintenance and up keep training on 08/04/22 l) Manuring Training on 17& 18/03/22. m) Harvesting and FFB Grading on 10/03/22. n) Water Treatment Plant Training on 05/04/22 and etc. 	
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>	Sighted in Training Schedule & Actual Training date for Supply Chain, Traceability and Mass Balance (23/02/22) Attended by 2 W/bridge Clerk and Office staff.	Complied
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing</p>	<p>Genting Sabapalm receives and processes both RSPO certified and uncertified FFB hence it has opted to use the Mass Balance module. Therefore, this indicator is not applicable.</p>	Complied

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	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.		
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>	Genting Sabapalm Oil Mill receives and process both certified and uncertified FFB (Own estate -75% and outsider (25%)). Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO Certified Products.	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in Table 10 of this public summary report.	Complied

3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>Based on verification of transaction records extracted from RSPO Palm trace, the registration and reporting requirements found to be met. Details were verified as below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Member Name:</td> <td>Genting Oil Mills (Sabah) Sdn Bhd. Genting Sabapalm Oil Mill</td> </tr> <tr> <td>Country:</td> <td>Malaysia</td> </tr> <tr> <td>RSPO Member Name:</td> <td>Genting Plantations Berhad</td> </tr> <tr> <td>RSPO Member Number:</td> <td>1-0086-06-000-00</td> </tr> <tr> <td>License Validity:</td> <td>09/12/2020 – 08/06/2022</td> </tr> </table>	Member Name:	Genting Oil Mills (Sabah) Sdn Bhd. Genting Sabapalm Oil Mill	Country:	Malaysia	RSPO Member Name:	Genting Plantations Berhad	RSPO Member Number:	1-0086-06-000-00	License Validity:	09/12/2020 – 08/06/2022	Complied
Member Name:	Genting Oil Mills (Sabah) Sdn Bhd. Genting Sabapalm Oil Mill												
Country:	Malaysia												
RSPO Member Name:	Genting Plantations Berhad												
RSPO Member Number:	1-0086-06-000-00												
License Validity:	09/12/2020 – 08/06/2022												
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol 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>Documented procedures were available for verification as below:</p> <ol style="list-style-type: none"> 1. The RSPO Supply Chain implementation in the mill were guided by the document Genting Plantations Berhad; Sustainability Management Procedure Manual; Title: Supply Chain And Traceability (Palm Oil Mill); Doc Number: SMP-GPB-23; Revision: 13; Issue Date: February 2022. The procedures cover the implementations of all the elements of the supply chain requirements. 2. Complete and up to date records and reports that demonstrated compliance with the SCCS requirements were available for verification as below: <ul style="list-style-type: none"> – Supply Chain, Traceability and Mass Balance Training conducted on 23/02/2022, attended by weighbridge clerk and office staffs. – Mass Balance records (last updated on 05/04/2022). – RSPO SCCS Internal Audit conducted on 17/03/2022 	Complied										

		<ul style="list-style-type: none"> - RSPO SCCS Management Review conducted on 08/04/2022 3. The Weighbridge Clerks have been appointed as the person-in-charge for Supply Chain, Traceability and Mass Balance requirements of RSPO, ISCC and MSPO Sustainability Standards. The appointment letters were available for verification dated 01/12/2016 and 01/08/2020, undersigned by the Sr. Assistant Manager and Acting Manager respectively. Interview with the PIC showed that they were able to demonstrate the implementation of their procedures in accordance to the standard. 4. The mill has documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill stated in the Genting Plantations Berhad; Sustainability Management Procedure Manual; Title: Supply Chain And Traceability (Palm Oil Mill); Doc Number: SMP-GPB-23; Revision: 13; Issue Date: February 2022. 	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management 	<p>The Internal Audit Implementation in Genting Sabapalm Oil Mill was guided by the document Genting Plantations Berhad; Sustainability Management Procedure Manual; Sustainability Internal Audit, Document No.: SMP-GPB-03, Rev. 06 dated August 2021 for conducting RSPO SCCS and RSPO Rules on Market Communications and Claims internal audit.</p> <p>The last internal audit was carried out on 17/03/2022 by an internal auditor sourced from Genting's office in Sandakan. The coverage of internal audit has included the General Chain of Custody Requirements for the Supply Chain and Mass Balance module. There was no non-conformity raised as a result of the</p>	Complied

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	review at least annually. The mill shall maintain the internal audit records and reports.	internal audit. A RSPO Management Review was conducted on 08/04/2022 as well.	
3.8.7	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>The accompanying documents of incoming FFB from own estate are estate’s weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate’s ticket number is recorded in the mill’s ticket number.</p> <p>Sampled the FFB Despatch Advice from Genting Sabapalm Estate as below:</p> <ul style="list-style-type: none"> a. Estate: Genting Sabapalm Estate b. Despatch Advice Number: A 059661 c. PORLA License Number: 002347-702000 d. Date of Despatch: 19/01/2022. e. Field: P9928 & P9622 f. Total FFB Weight: 4.87 mt <p>There has been no projected overproduction as per record monitoring and palm trace record.</p> <p>The mechanism for handling non-conforming oil palm products and/or documents is addressed under Control of Non-conforming Product [PM-PRD-05, Rev. 1, Dated 12/12/2019] which describes the non-certified material or product shall be kept segregated from the certified ones.</p>	Complied
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single</p>	<p>The mill has sold RSPO Certified CPO and PK for the review period. All the information required by the standard was available in various shipping documents such as transporter’s delivery order,</p>	Complied

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	<p>document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> i The name and address of the buyer; ii The name and address of the seller; iii The loading or shipment / delivery date; iv The date on which the documents were issued; v RSPO certificate number; vi A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); vii The quantity of the products delivered; viii Any related transport documentation; ix A unique identification number. 	<p>mill's weighbridge, buyer's receiving notes, to name a few. The following contracts were verified:</p> <p><u>Sales of RSPO Certified CPO</u></p> <ul style="list-style-type: none"> 1. Buyer: XXX 2. Seller: Genting Oil Mills Sabah SB 3. Delivery Date: 18/01/2022 4. RSPO Certificate Number: RSPO 653477 5. Product: CPO RSPO MB 6. Quantity: 39, 360 KG 7. Ticket Number: CPOMB22000005W <p><u>Sales of RSPO Certified PK</u></p> <ul style="list-style-type: none"> 1. Buyer: XXX 2. Seller: Genting Oil Mills Sabah SB 3. Delivery Date: 19/01/2022 4. RSPO Certificate Number: RSPO 653477 5. Product: PK RSPO MB 6. Quantity: 29, 150 KG 7. Ticket Number: PKMB22000002W 	
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: 	<p>The company has outsourced the transportation for CPO and PK delivery to third parties and own company transporter. Transporter Agreements were verified as below:</p> <ul style="list-style-type: none"> a. Landasan Kembar Sdn Bhd <ul style="list-style-type: none"> - CPO Transport Agreement; Agreement Number: GSOM CPO agmt-LK-2021; Date of Agreement; 01/06/2021 – 31/03/2023. 	Complied

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	<ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. 	<ul style="list-style-type: none"> - PK Transport Agreement; Agreement Number: GSOM PKagmt-LK-2021; Date of Agreement; 01/06/2021 – 31/03/2023. b. Juita Baru Sdn Bhd <ul style="list-style-type: none"> - CPO Transport Agreement; Agreement Number: GSOM CPO agmt-JB-2021; Date of Agreement; 01/06/2021 – 31/03/2023. - PK Transport Agreement; Agreement Number: GSOM PKagmt-JB-2021; Date of Agreement; 01/06/2021 – 31/03/2023. <p>Requirement to adhere to RSPO supply chain standard is clearly defined in the agreement and the contractors have acknowledged on the requirements to be complied.</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.	NA as process/physical handling of product is not done by any outsourced contractors.	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.	NA as process/physical handling of product is not done by any outsourced contractors.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. 	<ul style="list-style-type: none"> i There is evidence that POM maintain records and report covering all aspect in the supply chain in the document title ISCC, RSPO and MSPO sustainable products- Monthly movement summary report (PK). ii Retention of all records has been stated in procedure document number SMP-GPB-23 issuance date February 2022 title sustainability management manual procedure manual that retention period has been set at 2 years. Sample has been taken for monthly movement summary report for CPO and PK 	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>in year 2019 and 2020 and weighbridge for FFB received in May 2019.</p> <p>iii Not applicable, POM operate under MB model.</p> <p>iv a) POM practices records and balance base on continuous and three time monthly basis which has been recorded in document ISCC, RSPO and MSPO sustainable products-Monthly movement summary report (PK).</p> <p>b) Volumes of certified CPO and PK that has been delivered and deducted from the material accounting system.</p> <p>c) CPO and PK has been deliver as positive and maintain ed 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>Extraction rate has been recorded on monthly basis and recorded in the document ISCC, RSPO and MSPO sustainable products-Monthly movement summary report (PK). Details as per below</p> <table border="1" data-bbox="1182 970 1899 1273"> <thead> <tr> <th rowspan="2"></th> <th colspan="2">OER (%)</th> <th colspan="2">KER (%)</th> </tr> <tr> <th>Est</th> <th>Act</th> <th>Est</th> <th>Act</th> </tr> </thead> <tbody> <tr> <td>September</td> <td>21.00</td> <td>20.59</td> <td>4.10</td> <td>4.56</td> </tr> <tr> <td>October</td> <td>21.00</td> <td>21.29</td> <td>4.00</td> <td>4.42</td> </tr> <tr> <td>November</td> <td>21.10</td> <td>20.85</td> <td>4.00</td> <td>3.83</td> </tr> <tr> <td>December</td> <td>21.10</td> <td>19.58</td> <td>4.00</td> <td>4.30</td> </tr> </tbody> </table>		OER (%)		KER (%)		Est	Act	Est	Act	September	21.00	20.59	4.10	4.56	October	21.00	21.29	4.00	4.42	November	21.10	20.85	4.00	3.83	December	21.10	19.58	4.00	4.30	<p>Complied</p>
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<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>Refer indicator 3.8.13</p>	<p>Complied</p>																													

3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	Not applicable since POM operate under MB model.	Complied
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>Sample of 3 announcement has been verified Details as per below</p> <p>a) TR-de5070fb-f0c4</p> <p>b) TR-1e492b8d-4165</p> <p>c) TR-b303a5b7-a5fc</p> <p>Removal of certified stock that has been sold for different scheme and conventional has been done on 11/04/2022 with total 2490.39mt has been sold under ISCC for CPO and 429.946mt PK sold as conventional.</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>	RSPO trademark was not in use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Genting Sabapalm POM does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p> <p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p>	Not applicable as no off-product claim made by Genting Sabapalm POM as to date	Not Applicable

	<p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by Genting Sabapalm POM as to date	Not Applicable
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	Not applicable as no off-product claim made by Genting Sabapalm POM as to date	Not Applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Genting Sabapalm 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. Sample of document taken for D/N number 91053, contract number SOM/1221/SO2CPO dated 18/01/2022	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 weighbridge ticket, it stated that i.e. product/commodity with SCC model (CPO/Palm Kernel RSPO MB) and RSPO certificate number.	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:	Genting Sabapalm POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not Applicable

	<p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</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.	No business to consumer communication on product specific claim made Genting Sabapalm POM and only producing crude and unfinished product. This is not applicable for Genting Sabapalm POM	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.	No business to consumer communication on product specific claim made Genting Sabapalm POM and only producing crude and unfinished product. This is not applicable for Genting Sabapalm POM	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.	No business to consumer communication on product specific claim made Genting Sabapalm POM and only producing crude and unfinished product. This is not applicable for Genting Sabapalm POM	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	No business to consumer communication on product specific claim made Genting Sabapalm POM and only producing crude and unfinished product. This is not applicable for Genting Sabapalm POM	Not Applicable

6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made Genting Sabapalm POM and only producing crude and unfinished product. This is not applicable for Genting Sabapalm POM	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.	No business to consumer communication on product specific claim made Genting Sabapalm POM and only producing crude and unfinished product. This is not applicable for Genting Sabapalm POM	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.	No business to consumer communication on product specific claim made Genting Sabapalm POM and only producing crude and unfinished product. This is not applicable for Genting Sabapalm POM	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 .	No business to consumer communication on product specific claim made Genting Sabapalm POM and only producing crude and unfinished product. This is not applicable for Genting Sabapalm POM	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.	Genting Sabapalm POM receives and process both certified and uncertified FFB (Own estate -75% and outsider (25%)). Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO Certified Products.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Based on the excel sheet mass balance accounting of the mill, production of certified products was calculated correctly according to fractions of FFB received from both certified and non-certified suppliers. Therefore, 100% of certified oil palm content in the products can be achieved.	Complied
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> Surrounded by the text: 'Certified sustainable palm oil'. The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains 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 	Genting Sabapalm POM does not use the RSPO label in its product (CPO & PK). This is confirmed due site visit observation and interview with the mill workers.	Complied

	<p>trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</p> <ul style="list-style-type: none"> In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <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>No evidence of storytelling in product related communication. Hence, this requirement is not applicable</p>	<p>Not Applicable</p>
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the</p>	<p>Genting Sabapalm Certification Unit adopted Genting Plantations Berhad Social Policy; Signed by the President & COO Tan Wee Kok; Date: 14/9/2020. The policy stated that the company as a responsible organisation is committed to ensuring all workers and</p>	<p>Complied</p>

	<p>unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>employees are treated fairly, equally and with respect according to local, national and ratified international laws. It also stated that the company respect human rights and support international human rights law and prohibit retaliation against human rights defenders who submit complaints in good faith in line with company's Whistle-blower Policy.</p> <p>Latest communication of the policy and Genting SOP was conducted by GSOM during Morning Muster dated on 15/02/2022 and GSPE on 14/03/2022 attended by all staff and employees.</p> <p>While for external stakeholder, it has been communicated through stakeholder consultation that has been conducted conducted on 15/03/22 at Club House. The minutes of meeting with attendance of mill representatives (Manager, Sr. Asst Manager, Assistant Manager, Document Controller). While stakeholder included Kg Klagan Community Head, S.K Ladang Sabapalm, Kg. Tembidong Bidong Head, Kg. Tagas-Tagas Head, Humana and etc.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Genting Plantations Berhad ensure all personnel are treated fairly and protected from any form of discrimination that would constitute a violation of their human rights. Interviewed with the workers, FFB supplier, local communities and contractors confirmed that no harassment by the management.</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</p>			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has established Complaints and Grievances procedure with Doc. No.: SMP-GPB-19, Rev. 04 dated March 2020 to provide guidelines on handling complaints & grievances involved internal and external stakeholders.</p> <p>Besides, Social Policy dated 14/09/2020 was established where they prohibit retaliation against human rights defenders who submit complaints in good faith in line with their existing Whistle-blower</p>	Complied

		<p>policy which provide a grievances channel for human rights defenders to report their concerns freely and without fear of reprisal or intimidation.</p>	
<p>4.2.2</p>	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -</p>	<p>Genting Plantations Berhad has established Complaints and Grievances procedure with Doc. No.: SMP-GPB-19, Rev. 04 dated March 2020 to provide guidelines on handling complaints & grievances involved internal and external stakeholders. All the written confidential complaints shall be dealt by Manager. The timeframe for the action to be taken depends on seriousness of the complaints or grievance. The accepted timeframe to acknowledge and respond to the complaint or grievances is within 1 month upon receipt.</p> <p>Whistle-blower policy dated 01/06/2020 was implemented and this is available in https://www.gentingplantations.com/wp-content/uploads/2020/06/Whistleblower-Policy.pdf.</p> <p>There was a new channel for workers to raise their grievances through CARELINE MOBILE. Seen the memo dated 04/11/2022 with Careline mobile number, person in charge, email address and operating hours. The CARELINE MOBILE is operating 24 hours a day, 7 days a week.</p> <p>Latest communication of the policy and Genting SOP was conducted by GSOM during Morning Muster dated on 15/02/2022 and GSPE on 14/03/2022 attended by all staff and employees.</p> <p>While for external stakeholder, it has been communicated through stakeholder consultation that has been conducted conducted on 15/03/22 at Club House. The minutes of meeting with attendance of mill representatives (Manager, Sr. Asst Manager, Assistant Manager, Document Controller). While stakeholder included Kg Klagan Community Head, S.K Ladang Sabapalm, Kg. Tembidong Bidong Head, Kg. Tagas-Tagas Head, Humana and etc.</p>	<p>Complied</p>

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		As per interview with the workers, there is evidence that they are aware about the procedure and understand process as per stated in the procedure. There is no illiterate workers has been identified for both GSPOM and GSPE					
4.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>The estates ad mill has Complaints/ Grievances Record Book to record any complaint or grievance received. Sampled of the records of complaint as below:</p> <table border="1" data-bbox="1137 616 1919 1118"> <tr> <td data-bbox="1137 616 1541 715"> <p>03/05/2021 – ref no. 057</p> <p>1. Clogged septic tank</p> </td> <td data-bbox="1541 616 1919 715"> <p>03/05/2021</p> <p>1. The clogged was removed</p> </td> </tr> <tr> <td data-bbox="1137 715 1541 1118"> <p>26/03/2021 – workers welfare committee meeting</p> <p>1. Workers requested for water tank platform to be repaired</p> <p>2. Workers requested for clogged drain to be repaired</p> </td> <td data-bbox="1541 715 1919 1118"> <p>1. 12/04/2021</p> <p>The water tank platform has been repaired as per picture dated 12/04/2021.</p> <p>2. 28/12/2021</p> <p>The material and equipment was ordered and received on 10/04/2021 as per invoice no. IN2021040204. The repair work for all drain was completed on 28/12/2021.</p> </td> </tr> </table>	<p>03/05/2021 – ref no. 057</p> <p>1. Clogged septic tank</p>	<p>03/05/2021</p> <p>1. The clogged was removed</p>	<p>26/03/2021 – workers welfare committee meeting</p> <p>1. Workers requested for water tank platform to be repaired</p> <p>2. Workers requested for clogged drain to be repaired</p>	<p>1. 12/04/2021</p> <p>The water tank platform has been repaired as per picture dated 12/04/2021.</p> <p>2. 28/12/2021</p> <p>The material and equipment was ordered and received on 10/04/2021 as per invoice no. IN2021040204. The repair work for all drain was completed on 28/12/2021.</p>	Complied
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4.2.4	<p>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.</p> <p>- Minor compliance -</p>	As mentioned in the procedure above, under Clause 2.1.10, the complainant shall be given the option of access to independent legal and technical advice, to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	Complied				
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>							

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>Consultation for any contribution to all stakeholders mainly from the stakeholder consultation which latest was conducted on 15/03/2022. Other than that, feedback from the consultation and communication procedure will used as one of the channel. For Genting Sabapalm POM, contribution has been made mainly to provide potable and clean water to surrounding communities since there is severe water shortage during draught season. Records of water supplying maintained in the document summary of social benefits and contribution to employees, their families and community. While for Genting Sabapalm Estate, contribution has been made to Sekolah Kebangsaan Ladang Sabapalm and Humana by providing house to all the teacher. Other than renovation of the school has been done in year 2021. Grass cutting has been done for Balai Polis Tagas Tagas.</p>	Complied												
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.															
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Land title for Sabapalm Estate has been verified with total 3 land title including Genting Sabapalm POM. Details of the land title as per below</p> <table border="1" data-bbox="1137 995 1935 1292"> <thead> <tr> <th>Land title number</th> <th>Hectarage</th> <th>Lease period</th> </tr> </thead> <tbody> <tr> <td>08510997</td> <td>2118.120</td> <td>10/07/1888-10/07/2887</td> </tr> <tr> <td>08510996</td> <td>1957.46</td> <td>10/07/1888-10/07/2887</td> </tr> <tr> <td>085319231</td> <td>283</td> <td>01/01/1987-31/12/2085</td> </tr> </tbody> </table>	Land title number	Hectarage	Lease period	08510997	2118.120	10/07/1888-10/07/2887	08510996	1957.46	10/07/1888-10/07/2887	085319231	283	01/01/1987-31/12/2085	Complied
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4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	Not applicable since there is no customary right land. Land has been leased by Genting Plantation Berhad.	Not Applicable
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	Not applicable since there is no customary right land. Land has been leased by Genting Plantation Berhad.	Not Applicable
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	Not applicable since there is no customary right land. Land has been leased by Genting Plantation Berhad.	Not Applicable
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	Not applicable since there is no customary right land. Land has been leased by Genting Plantation Berhad.	Not Applicable
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	Not applicable since there is no customary right land. Land has been leased by Genting Plantation Berhad.	Not Applicable
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	Not applicable since there is no customary right land. Land has been leased by Genting Plantation Berhad.	Not Applicable

	- Minor compliance -		
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	Not applicable since there is no customary right land. Land has been leased by Genting Plantation Berhad.	Not Applicable
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	Not applicable since there is no customary right land. Land has been leased by Genting Plantation Berhad.	Not Applicable
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Not applicable since there is no customary right land and there no planning for new planting. Land has been leased by Genting Plantation Berhad.	Not Applicable
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	Not applicable since there is no customary right land and there no planning for new planting. Land has been leased by Genting Plantation Berhad.	Not Applicable
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples.	Not applicable since there is no customary right land and there no planning for new planting. Land has been leased by Genting Plantation Berhad.	Not Applicable

	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 -	Not applicable since there is no customary right land and there no planning for new planting. Land has been leased by Genting Plantation Berhad.	Not Applicable
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	Not applicable since there is no customary right land and there no planning for new planting. Land has been leased by Genting Plantation Berhad.	Not Applicable
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	Not applicable since there is no customary right land and there no planning for new planting. Land has been leased by Genting Plantation Berhad.	Non-compliance
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 -	Not applicable since there is no customary right land and there no planning for new planting. Land has been leased by Genting Plantation Berhad.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	Not applicable since there is no customary right land and there no planning for new planting. Land has been leased by Genting Plantation Berhad.	Not Applicable

<p>Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -</p>	<p>The management of Genting Plantations Berhad has established internal procedure title "Negotiation, compensations and handling procedure document number SMP-GPB-18 issuance date 05/09/2014. Stated in the clause 2.0 land/boundary disputes where has outline the process of handling any issues related land dispute and identification of legal, customary and user rights. Identification of persons entitle to compensation also stated in the same procedure</p>	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -</p>	<p>The management of Genting Plantations Berhad has established internal procedure title "Negotiation, compensations and handling procedure document number SMP-GPB-18 issuance date 05/09/2014.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -</p>	<p>There is no scheme smallholder involved in the certification unit.</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -</p>	<p>SOP refer to Indicator 4.6.1. There was no any land dispute reported since last. This has verified through interview with the 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>Genting Plantations Berhad has established the Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev.</p>	Complied

		02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.	
4.7.2	(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 -	Not applicable since there is no issues of land has been identified.	Not Applicable
4.7.3	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 -	Not applicable since there is no issues of land has been identified.	Not Applicable
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	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 -	The plantation was established since 1980s and there was no new planting in estates under certification unit since last audit. Therefore, FPIC should not be applicable. Genting Plantations Berhad has established the Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties	All the estates under certification unit had maintained all existing user rights and it is confirmed during interview with stakeholders.	Complied

	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 -	The plantation was established since 1980s and there was no new planting in all the estates under certification unit since last audit.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Genting Plantations Berhad has established the Procedures for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development (Doc. No.: SMP-GPB-27, Rev. 02 dated March 2020). The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures have also including the mechanism to calculate and distribute fair compensation. There was no land dispute reported since last audit. This has verified through interview with the stakeholder	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	The prices paid for FFB was publicly available at weighbridge area and updated by weekly basis. Records shown FFB prices purchased by Genting Sabapalm Oil Mill were as following: a) December 2021 = RM 1,005/MT FFB b) January 2022 = RM 1,018/MT FFB c) February 2022 = RM 1,141/MT FFB	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). - Critical (Major) compliance -</p>	<p>Sighted Minutes of Meeting with Stakeholders conducted on 26/03/22 at Sabapalm Club House and attended by stakeholders. Available a briefing slides on FFB Pricing Formula presented for GSOM Stakeholder Meeting Mar'2022.</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. - Critical (Major) compliance -</p>	<p>Available a clear explanation made to stakeholders as CPO Selling Price Expenses as Nov 21 (MPOB Average) Pen. Mal Average Price-CPO RM 5,345.00 Sabah Average Price-CPO RM 5,304.00. CPO Selling Expenses Formula CPO Selling Price = RM 5,345.00 Less (-) a) Ocean Freight/Sabah Discount = RM 40.00 b) MPOB Cess = RM 16.00 c) Sabah Sales Tax (RM 5,304 X 7.5%) = RM 397.80 d) CPO Ex-Mill Price = RM 4,891.20</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. - Critical (Major) compliance -</p>	<p>There is evidence that women has been given chance in decision making for smallholders that supplying FFB to Genting Sabapalm POM. It has been confirmed through interview with the FFB supplier itself.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -</p>	<p>Genting Sabapalm Oil Palm received crops from both own supply bases and external suppliers. For external FFB providers mainly among smallholders, it is not compulsory for them to sign any agreement since there is no restriction for them to send FFB to other mill, Genting Plantation Berhad has established an External Fresh</p>	Complied

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		Fruit Bunch (FFB) Procurement Policy Agreement were provided to them. The policy is fair, legal and transparent and have an agreed timeframe for payment. The policy agreement was signed by Senior Vice President Marketing Palm Products dated on 31/3/2021. As per verification from the weighbridge tickets, payment will be done before 7 th next month and has been confirmed base on payment voucher and interview with the FFB supplier.	
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>Sampled among suppliers such as:</p> <p>a) Abdul Amit b. Itin as Payment Advice dated 12/03/22 (PayLink Giro transfer) ref: 526891940100216. Value Date:11/03/22.'</p> <p>b) A. Rahman Harry b. Diong as Payment Advice dated 11/03/22 (PayLink Giro Transfer) ref: 526891940100214. Value Date 11/03/22.</p> <p>c) A. Rahman Harry b. Diong as Payment Advice dated 13/01/22 (PayLink Giro Transfer) ref: 526129519199991. Value Date 12/01/22.</p> <p>All payment to be made on the twelfth day of the month for the previous month supplied FFB as stated in the contract.</p> <p>Agreed payment made as Payment Advice sampled above attached with FFB Received Details that included Date Received, Ticket No., Estate, Lorry No., Driver's Name, Time In, Time Out, Weight and etc.</p>	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>Genting Sabapalm POM has ensured a verification of Weighbridges as certificate by under Akta Timbang dan Sukat 1972 and Peraturan Timbang dan Sukat 1981, done by Metrology Corporation Malaysia under no B1626317 (Equipment No. 113650708) and B162150256 (Equipment No. 162150256) valid until dated 10/07/22.</p>	Complied
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the</p>	<p>As per interview, Genting Sabapalm has not issues to support any independent smallholder in term of technical support to</p>	Complied

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	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 -	independent smallholder that interested to be certified. As per interview, smallholder has been certified for MSPO under SPOC scheme with MPOB	
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 -	For any grievance cases, a mechanism available as per Sustainability Management Procedure Manual Title: Complaints and Grievances (MP-GPB-19) Rev. 04, Issue Date: March 2020. No grievances related to smallholders FFB suppliers received by GSOM since last audit.	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	There is evidence that the management consults with interested smallholders during the stakeholders consultation conducted on 15/3/2022. It has been confirmed base on interview with the smallholders. As for now, the smallholder did not show any interest in RSPO certification.	Complied
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	Genting Sabapalm established support programme in term on of consultation and recommendation to smallholder by the agronomist. Other than, field visit also has been done by estate representative as part of continuous improvement.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Not applicable, all smallholder supplied to Genting Sabapalm POM need to have MPOB licences.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Not applicable since there is no scheme smallholders.	Not Applicable

5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>Smallholder support programme has been reviewed during the management review meeting that has been conducted on yearly basis. The RSPO P&C Management Meeting was conducted simultaneously for the whole certification unit at the mill on 08/04/2022 chaired by the Sr. Estate Management.</p>	Complied
<p>Principle 6: Respect workers' rights and conditions</p>			
<p>Criterion 6.1: Any form of discrimination is prohibited.</p>			
6.1.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm POM Certification Unit adopted Genting Plantations Berhad Social Policy; Signed by the President & COO Tan Wee Kok; Date: 14/9/2020. The policy stated that the company as a responsible organization is committed to ensuring all workers and employees are treated fairly, equally and with respect according to local, national and ratified international laws. It also stated that the company respect human rights and support international human rights law and prohibit retaliation against human rights defenders who submit complaints in good faith in line with company's Whistle-blower Policy. As per interview, it has been confirmed that there is no specific categories for each types of works and workers able to choose their works base on their expertise. Sample has been taken for spraying and harvesting gang, where workers are from different origin, religion and races.</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>For both estate and POM, there is no new foreign workers has been recruited and for existing foreign workers, latest recruitment is on February 2020 and has been confirmed that there is no recruitment fee has been charge during the recruitment.</p> <p>For local workers, latest recruitment in March 2022. As per interview with the workers, there is no recruitment fee has been charged.</p> <p>Interview has been conducted for both Sabapalm POM and Sabapalm Estate and confirmed no discrimination has been</p>	Complied

		practices. All employees received equal payment, benefits and accommodation as per stated in the employment contract.	
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	For Genting Sabapalm POM, sample has four new workers that has been recruited on 09/03/2022 as processing workers. There are evidences that recruitment has been done through interview and capabilities screening by the POM manager and approved by Senior Manager processing. There are 4 workers that get increment in March 2022 due to their long services and performance. Sighted email of approval by Mr Lee Kar Leong dated 21/03/2022.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	Pregnancy test only been conducted for those women that has any illness or pregnancy symptoms with recommendation of hospital assistant. There is no compulsory pregnancy test in certain frequency has been practices. It has been confirm through interview with women workers.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	Gender committee has been established for Genting Sabapalm POM and sighted the committee chart that has been led by Puan Surianti Mayah. Latest meeting has been done on 10/11/2021 and all women workers. While for Genting Sabapalm Estate, meeting has been conducted with representative of workers on 26/02/2022. Issues that was discussed are pregnancy medical check-up for women and best housing competition. Interview with gender committee chairman, Mdm Helena confirmed that gender committee meeting has been done every 3 months. All female workers and spouse has been invited to the gender committee meeting.	Complied
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Both Genting Sabapalm POM and Genting Sabaplam Estate is located in Beluran district and the minimum wages set by the government at MYR1100/month and MYR42.31/day. For Genting	Complied

		Sabapalm POM, all employees been paid same rate as legal requirement.	
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Details of pay and conditions of employment are stated and documented in the Employment Agreement given to all workers and staff in Genting Sabapalm POM Certification Unit. The documents are prepared in dual-language, i.e. English and another language that the worker is conversant in (either Indonesian or Tagalog). The contract stipulates terms of conditions of service such position, period of employment, types of work, responsibilities of employer, responsibilities of employee, salary payable, working hours, annual leave, sick leave and public holidays, mutual termination of contract, facilities, etc. The documents are signed by the Human Resources Manager and the worker. Several question has been asked by the auditor during the workers interview on the employment contract and there is evidence that all workers including foreign and local understand and able to explain the content.</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>Employment contract for all employees verified in the document title "Perjanjian Pekerjaan" which has been signed by both parties (management and employees).</p> <p>Stated in the employment contract as per below</p> <ol style="list-style-type: none"> Salary payment is based on current minimum wages order set by the government. Overtime will be paid base on 1.5 times for normal rate, time 2 for rest day and times 3 for public holiday Employee entitles with total 15 days of public holiday, Entitlement of 14 days sick leave for below 2 years services, 18 days for more than 2 years and 22 days for more than 5 years 	Complied

		<p>e) Working hours has been set 8 hours per day and 6 days per week with 1 day of rest day</p> <p>f) Maternity leave total 60 days</p> <p>Sample taken for workers in Sabapalm POM as per below</p> <ul style="list-style-type: none"> a. E00004 b. E00011 c. E00270 d. E00154 e. E00314 f. E00178 	
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>Genting Sabapalm POM monitored working hours base on punch card system for all employee with 8 hours of total working hours. Total hours of overtime will be summarised and extract to the check roll summary and key in into Lintramax system.</p> <p>There is no deduction for all employees in Genting Sabapalm POM except employee provident fund and SOCSO. Sample has been taken for payment May, June and September 2021.</p> <p>For leave application, all employees need to submit their application in to the management 7 days before using "leave application form". Sample verified for workers requested for unpaid leave on June 2021 for personal issues.</p> <p>While for Sabapalm Estate, working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours as labour law.</p> <p>As at current status, there was none has crossed approved hours of overtime. Verified the pays lips, the payment and calculation of overtime well distributed.</p> <p>The overtime rate after 8 hours daily rated is: General Workers</p>	Complied

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		<p>a. Mon - Sat – daily rated / 8 hours x 1.5 b. Sunday - daily rated / 8 hours x 2.0 c. Public holiday – daily rated / 8 hours x 3.0</p> <p>The estate implemented the checkroll system to records the working hours for all workers. The data from checkroll were transferred to Lyntramax computer system for salary calculation.</p> <p>Verified the working hours and overtime data in checkroll, Lyntramax and payslips found all the data were consistent. Reviewed the data for the month of August 2021, November 2021 and February 2022</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Both Genting Sabapalm POM Genting Sabapalm POM has conducted line site inspection on weekly basis and sample has been taken for December, January and February 2022. Water and electric supply has been provided for free to all employees. Clinic has been established in POM and estate area with hospital assistant. Humana has been established to provide education to Indonesian kids.</p> <p>Houses are equipped with 2 or 3 bedrooms and a bathroom. As per site visit for both Sabapalm Estate and POM sighted that each family has been provided one house while for single workers, one room has been provided.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There was sundry shop nearby the estates and mill area. Besides, the estates and mill were located nearby to the town and the workers can access to town by own/ public transport. Site visit to the housing area found that workers are allowed plant/ farm vegetable at the housing area. Interviewed with the workers informed that they have no issue to access to foods and goods.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p>	<p>Genting Plantations Berhad has established the prevailing wage calculation last updated on 10/02/2022 for both Genting Sabapalm POM and Estate to include all the in-kind benefits provided to the</p>	Complied

<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>workers. The prevailing wages is more than the Minimum Wage Order 2020.</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 was no casual worker employed by the mill and estates. All the workers are permanent workers. Contract workers are employed by contractors for permanent work such as harvester and FFB transporter in the estates.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Statement of freedom of association and right to collective bargaining has been stated in the internal policy Social Policy; Signed by the President & COO Tan Wee Kok; Date: 14/9/2020</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>There is no union in Genting Sabapalm POM and Genting Sabapalm Estate. However, the management has taken initiative to established workers association committee represented by each races which has been elected by the workers in year 2015. Latest meeting has been done on 31/09/2021 with the management</p>	Complied

6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Seen the record of appointment letters of the workers' committee found that the management only issued the appointment letter based on the result of election by the workers. The appointment letters dated 15/02/2022 were sighted. Interviewed with the workers' representatives confirmed that they were elected among the workers. No interference from management.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Genting Plantations Berhad has established the Social Policy; Signed by the President & COO Tan Wee Kok; Date: 14/9/2020. Stated in the policy that, the management will not use any child labour and children`s right will be respected. It also has been include in the services contract of 3 contractors in Genting Sabapalm POM as below</p> <ul style="list-style-type: none"> a. Landasan Kembar Sdn Bhd b. Bumi Aktif Engineering c. New Gen Contractor 	Complied
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>As per Procedures for Social Management (Doc. No.: SMP-GPB-32, Rev. 01 dated April 2021), Clause 6.8.4, the estate and mill shall verify identification card, passport and work permit before employ workers to ensure no child labour in the company. The contractor shall also provide full details of the workers such as identification card, passport, work permit for age verification by the management. Reviewed the list of workers and passports found that no child labour was employed in the company.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There was no young person employed by all estates under certification unit as verified through the employee master list. Interviewed with the workers and management confirmed that all the workers employed are above 18 years old.</p>	Complied

6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>Communication of the social policy been done on 15/03/2022 and 26/03/2022 during the stakeholder consultation with attendance of all stakeholders, FFB supplier, contractors and local communities.</p>	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Sexual harassment policy has been documented signed by Mr Yong Chee Kong, chief executive officer dated 03/10/2019. There is evidence that communication of the policy was done during gender muster call and committee meeting. Sample has been taken dated 10/11/2021 with attendance of all women workers for Genting Sabapalm POM and for Genting Sabapalm Estate, policy communicated by the gender committee chairman, Mdm Helena Bulukun during muster call on 17/03/2022 and 19/03/2022.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has established the Social Policy; Signed by the President & COO Tan Wee Kok; Date: 14/9/2020. The policy includes the statement that reproductive rights are protected for all employees. Communication of the policy has been done on 08/04/2022 for sprayer gang by Mr Rizuan Durais and Rayner Dominic.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>There is no new mother in Genting Sabapalm POM and it has been verified base on the records and interview with women workers. While for Genting Sabapalm Estate, assessment of new mother has been done by hospital assistant where assessment has been done on 2nd week of deliver during the visit. Sample has been taken for mother name Reski Seri Rahayu Asri dated 08/11/2021 where assessment has been done during the monthly medical check up. There is special need required by the workers sample.</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>Grievance procedure which respect anonymity and protect complainant has been outline in 2 procedure which are "procedure on prevention and eradication of sexual harassment at the workplace" document number SMP-GPB-20 dated 11/10/2013 and "complaint and grievances procedure" document number SMP-GPB-19 dated March 2020. Stated in the procedure that complainants will protected and investigation will be done confidentially. There is no complaint related to harassment and abuse has been received by the management for both Genting Sabapalm POM and estate.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Based on documentation review and interviews conducted with sample workers at the estate and mill there is no evidence that workers are in a forced employment.</p>	Complied
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has developed Procedures for Social Management, Doc. No. SMP-GPB-32, Rev. 0, dated 18/1/2018. The procedure has clearly outlined the practices of the company such as no contract of substitution for the foreign workers, provide reasonable and safe living condition to all the employees, post arrival orientation will be provided to brief on terms and conditions,</p>	Complied

		safety & health, national and state laws and regulations and no discrimination to all the workers.	
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>Both operating units have formed an OSH Committee in the respective mill and estate to address all issues associated to Health and Safety in the operating units. The OSH Organisation Charts were available and displayed at the workstations.</p> <p>The Estate Manager, Mr. Albert Tay Kuang Te has been appointed as the OSH Committee Chairman as stated in the appointment letter dated 01/01/2022 undersigned by the Senior Manager – Processing (Sabah).</p> <p>OSH Committee of the respective operating units conducts regular OSH Meetings to address all issues related to OSH in the operating units. Workplace Inspections are conducted prior to the OSH Meeting.</p> <p>1. <u>Genting Sabapalm Oil Mill</u></p> <p>Genting Sabapalm POM have conducted regular OSH Meetings and Meeting Minutes were available for verification. The meetings were sighted to be conducted on 24/03/2022 (01/2022), 02/12/2021 (04/2021), 01/09/2021 (03/2021) and 16/06/2021 (02/2021).</p> <p>Available a Safety and Health Committee Organization Chart updated 18/02/22 where Chairman is Genting Sabapalm Estate Manager, and 10 Employer Representatives and 10 Employees Representatives. Meeting was conducted regularly (4 times a year) to discuss OSH issues at workplace as minutes sampled. Meeting was conducted on:</p> <ul style="list-style-type: none"> a) 18/05/21 b) 27/08/21 	Complied

		<p>c) 19/11/21 d) 24/02/22</p> <p>Sampled information discussed found attached with evidences of workplace inspection summary, accident statistics, other OSH matters.</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p><u>Genting Sabapalm POM</u></p> <ol style="list-style-type: none"> 1. Emergency Response Procedures was available in the document Genting Sabah POM; Emergency Response Procedures; Doc Number: SP-MGR-04; Doc Date: 01.08.2017. The ERP includes plans and procedures for emergency incidences such as fire outbreak, oil/chemical spillage, effluent overflow and accident. An emergency response team have been created in the mill to combat the incidences mentioned above. Regular trainings and drills are conducted for the team to handle emergencies. Fire Drill was conducted in the mill on 11/03/2022. 2. First aid kit inventory was available for verification. It was acknowledged that all required items were stated in the inventory and does not contain consumable medicines. The first aid holder's summary list was also available to include all important operations and worksites. The mill personals have attended Basic Life Support & First Aid Training on 24/02/2022. 3. SOP for Handling and Reporting Accidents were available in the document System Procedure: NADOPOD; Doc Number: SP-MGR-06; Doc Date: 01.08.2017. There were no accident cases reported for the year 2021. The JKKP 8 Form for 2021 was submitted on 15.01.2022 for the year ending 2021. As of to date there were no accidents reported for the year 2022 as well. <p>Genting Sabapalm Estate</p>	<p>Complied</p>

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		<p>Available Emergency Response Plan with effective date October 2007. Action to response found explained in the plan. Also available Notification and Investigation at Workplace effective July 09. Genting Plantation established a list of First Aid Box that contained 16 items. Record of First Aid Box Sent to HA on monthly basis by all keeper of first Aid Box (32 units). Record of inspection of First Aid Box for Jan-Marc 2022 sighted and consistently recorded by HA. Training for First Aider was conducted on 16/03/22 by HA at Club Labuk Sabapalm. Attended by 33 workers and staff. Available a certificate of Basic Life Support and First Aid Training on 24/02/22 (valid till 24/02/25) by St. Joh Ambulance Malaysia attended by Marni Bajur, Norafazira Bajur, Hendrikus Yohanes, Malini Bolokan Bansinai, Helena Bulikan, Harry Kalipus, Arni Jamal, Felleyana Darus and 4 others.</p> <p>Accident record sighted maintained as stated in Statistics of Accidents 2021. All accident were reported and investigated with proposed actions. The root causes and correctives action can be further improved with more in depth causes and action that able to prevent recurrence of accidents.</p>	
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 those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required and appropriate PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers rooms were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise</p>	Complied

		<p>themselves before returning home due to the hazard that the chemical residues could cause them.</p> <p>Sighted during site visit among sprayers, harvesters and manurers PPEs distributed without any charges such as Block 22 among Srayers in Sapi Division (Apron, helmets, safety boots, goggle, Nitrile hand glove and cartridge mask), Manuring at Block 92 in Klagan Division (3M Mask, apron, Nitrile glove, safety boots and goggles), Harvester in Klagan Division (safety boots, helmets). Sanitization facilities sighted at Chemical Store Area where a bath room located for washing PPEs and bathing after spraying and manuring activity. Washed PPEs will be left and kept at PPE area in the area and not allow to bring home. This was clearly understood based on interview session with spayers and manurers during site visit.</p> <p>Available an SOP for PPE Distribution to workers. Mentioned PPE is provided FOC to workers. Available PPE distribution records (Stock Card) maintained by Storekeeper as sampled.Sighted Store Requisition & Issuance Note for PPE dated:</p> <ul style="list-style-type: none"> a) 05/04/22 from Division Klagan requesting for 11 Safety Boots (yellow). b) 08/04/21 from Sapi Division requesting for 21 + 9 Safety Helmets. c) 08/04/22 from Sapi Division requesting for Safety Helmets. d) 08/04/22 from Bangkawat Division requesting for 6 Green Nitrile Gloves, 9 filter mask e) 07/04/21 from Klagan Division requesting for 6 Safety Helmets. f) 07/04/21 from Bangkawat Division requesting for 6 Safety Helmets and 6 Safety Boots. 	
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<p>6.7.4</p>	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for January – March 2022 for all operating units visited as below.</p> <table border="1" data-bbox="1137 507 1926 738"> <thead> <tr> <th>Operating Units</th> <th>Month</th> <th>No of Employees</th> <th>Contribution</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Genting Sabapalm Oil Mill</td> <td>Jan 2022</td> <td>66</td> <td>RM 2295.20</td> </tr> <tr> <td>Feb 2022</td> <td>66</td> <td>RM 2094.50</td> </tr> <tr> <td>Mar 2022</td> <td>67</td> <td>RM 1969.40</td> </tr> </tbody> </table> <p>Genting Sabapalm Estate has contributed to SOCSO evidence in Form 8A for Month of March 2022: RM 6,864.80 for 392 workers (local and foreign). February 2022: 6,374.50 for 405 workers. January 2022: RM 8,657.60 for 372 workers.</p>	Operating Units	Month	No of Employees	Contribution	Genting Sabapalm Oil Mill	Jan 2022	66	RM 2295.20	Feb 2022	66	RM 2094.50	Mar 2022	67	RM 1969.40	<p>Complied</p>								
Operating Units	Month	No of Employees	Contribution																						
Genting Sabapalm Oil Mill	Jan 2022	66	RM 2295.20																						
	Feb 2022	66	RM 2094.50																						
	Mar 2022	67	RM 1969.40																						
<p>6.7.5</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>The Operating units recorded all injuries and accidents in the LTA format as below:</p> <table border="1" data-bbox="1137 970 1915 1066"> <thead> <tr> <th>Operating Units</th> <th>2021</th> <th>2022 (as of 11/04/2022)</th> </tr> </thead> <tbody> <tr> <td>Genting Sabapalm Oil Mill</td> <td>nil</td> <td>nil</td> </tr> </tbody> </table> <p>Sighted Statistic of Accident 2021 for Genting Sabapalm Estate as recorded by HA.</p> <table border="1" data-bbox="1137 1193 1881 1383"> <thead> <tr> <th>No.</th> <th>Nature of Accident</th> <th>No. of cases</th> <th>Manday Lost</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Hit by palm frond</td> <td>2</td> <td>5</td> </tr> <tr> <td>2.</td> <td>Hit by iron</td> <td>1</td> <td>1</td> </tr> <tr> <td>3.</td> <td>Hit by loading stick</td> <td>1</td> <td>2</td> </tr> </tbody> </table>	Operating Units	2021	2022 (as of 11/04/2022)	Genting Sabapalm Oil Mill	nil	nil	No.	Nature of Accident	No. of cases	Manday Lost	1.	Hit by palm frond	2	5	2.	Hit by iron	1	1	3.	Hit by loading stick	1	2	<p>Complied</p>
Operating Units	2021	2022 (as of 11/04/2022)																							
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3.	Hit by loading stick	1	2																						

		Form JKPP 8 was submitted to DOSH dated 06/01/22 by Malini Bolokan Bansinai (HA).	
Principle 7: Protect, conserve and enhance ecosystems and the environment			
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm Estate continue to implement biological control to eradicate oil palm pest in the plantation such as leaf eating pest and rats among others. IPM techniques applied at the estate include monitoring of pest numbers and the use of triggers for initiation of control measures. Barn owls <i>Tyto Alba</i> has been introduced for biological control of rats. Barn owl boxes are constructed at the rate of 1 box to 20ha. Census records show that there was minimal outbreak of leaf eating pest. Although there have been minimal outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators and further reduce the outbreak. Records show that the estates have planted beneficial plants such as <i>Cassia cobanensis</i> and <i>Turnera subulate</i> and <i>Antigonon leptopus</i>.</p> <p>Yearly specific plans were available for the year 2022 by the estate. Sighted the IPM Plan for each estate as below:</p> <ol style="list-style-type: none"> Biological Trap – Installation of Pheromone trap to reduce pesticide usage. Beneficial Plant – Increase planting area. Current Planted Area: 611.28 Chain Expected Planted Area: 500.00 Chain Grass Cutting/ Rotor slasher – Current Resources: 4 rotor slashers covering all immature areas. Cow Cattle Grazing – Mature Area (No of heads: 103 heads) 	Complied

7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	Species referenced in the Global Invasive Species Database and CABI.org were not used in Genting Sabapalm Estate.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	There is no use of fire for pest control in Genting Sabapalm Estate. This was verified via documents and interview with the workers.	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	All pesticides used were those officially registered under the Pesticide Act 1974. All estates use only class II, class III & class IV pesticides as verified via the chemical register and the chemicals available in the chemical store of the respective estates. a. No illegal agrochemicals (stated by local and international laws) such as paraquat was used in their estates. b. The usage of the agrochemicals was based on the Sustainability Management Procedure; Doc No: SMP-GPB-28; Titled: Justification Of Pesticides Used; Revised on: 17/03/2015. SOP and in the Pictorial Safety Standard Book where written justifications had been provided for various fields operations. The Manual has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs.	Complied

7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained by the estate in the Pesticide Usage Monitoring Record from year 2016 to 2022 and submitted to the Head Quarters monthly. Verified the records as below:</p> <table border="1" data-bbox="1137 539 1935 687"> <thead> <tr> <th>Year</th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022 (todate)</th> </tr> </thead> <tbody> <tr> <td>a.i/Ha</td> <td>2.65</td> <td>1.16</td> <td>1.34</td> <td>0.43</td> <td>9.20</td> </tr> </tbody> </table>	Year	2018	2019	2020	2021	2022 (todate)	a.i/Ha	2.65	1.16	1.34	0.43	9.20	Complied
Year	2018	2019	2020	2021	2022 (todate)										
a.i/Ha	2.65	1.16	1.34	0.43	9.20										
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>The estate has implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. Sighted during the site visit at the estate, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.</p>	Complied												
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There is no evidence of prophylactic use of pesticides in Genting Sabapalm Estate.</p>	Complied												
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <p>a) Judgment of the threat and verify why this is a major threat</p>	<p>Genting Sabapalm Estate does not use chemical that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions or Paraquat in their daily operations. This was established during the verification of the chemical register and interview with the management representative.</p>	Complied												

	<p>b) Why there is no other alternative which can be used</p> <p>c) Which process was applied to verify why there is no other less hazardous alternative</p> <p>d) What is the process to limit the negative impacts of the application</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>	<p>This can also be evident in the estates Continual Improvement Plans which the estate has committed to:</p> <ol style="list-style-type: none"> 1. Use of alternative pesticides that are safe and less toxic. Change from Paraquat to other alternative chemicals i.e. Glyphosate, Glufosinate and, Monosodium. 2. Briefing to staffs and executives on minimizing pesticides and continue monitoring, avoid wastage and leakage, etc. 3. Planting cover crops at immature fields. Strive to establish covers before planting. 4. Increase Beneficial Plant areas. 5. Implement Cattle Grazing at suitable areas for reducing pesticides use which in changing spraying technique from circle and path spraying to circle spraying only. 6. Commence manual uprooting/slashing for selective weed control. 											
<p>7.2.6</p>	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. Sampled the training conducted for pesticide handlers as below: -</p> <table border="1" data-bbox="1137 1058 1921 1367"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Chemical Sprayers Training</td> <td>31/03/2022</td> </tr> <tr> <td>Water Treatment Training</td> <td>05/04/2022</td> </tr> <tr> <td>PPE, Chemical Calibration, Premix Area and Triple Rinsing Training</td> <td>06/04/2022</td> </tr> <tr> <td>Nursery – PPE Weeding and P&D Spraying & Manuring Training</td> <td>11/03/2022</td> </tr> </tbody> </table>	Training	Date	Chemical Sprayers Training	31/03/2022	Water Treatment Training	05/04/2022	PPE, Chemical Calibration, Premix Area and Triple Rinsing Training	06/04/2022	Nursery – PPE Weeding and P&D Spraying & Manuring Training	11/03/2022	<p>Complied</p>
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		Chemical Sprayers (Immature) Training	08/04/2022	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p>		Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Pesticide containers were found to be recycled and used as premix containers. The access containers were all triple rinsed and punctured and stored at the designated store before they are disposed to the licensed recycle waste collector.</p> <p>Sighted the latest consignment note for disposal of triple rinsed and punctured chemical drums as below: -</p> <p>Genting Sabapalm Estate: Latest Disposal of empty chemical drums as recycle waste disposed on 18.03.2022 to G-Planter Sdn Bhd; 270 Pcs of 20 L Chemical Containers, 300 Pcs of 10L Containers.</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>The management representative has concluded that there is no aerial spraying conducted in the estates.</p>		Complied

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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>Genting Sabapalm Estate has sent 32 workers to Medical Surveillance in 2022 by Klinik Elopura Sandakan. Sighted a letter dated 13/01/22 on Report for Occupational Medical Surveillance Check Up from Dr. Shaji A/L Pratap Gopal (HQ/12/DOC/00/529). From Summary Storekeeper (1), Workshop (3), P&D (25), Mandore (1), Driver (2). Total workers are 32 and 29 found to be fit to work.</p>	Complied						
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Upon verification with sprayers during site visits in interview session found no persons under the age of 18, pregnant or breastfeeding women work with pesticides. All of them understood on the requirement and able to explain the reason behind it.</p>	Complied						
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>									
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>The Waste Management Plan (for Estates and Mills) has been established by Genting Sabapalm Certification Unit. The document states the monitoring and Action plan of managing all waste generated in the mill and estate, including methods of disposal and its legal requirements associated to the type of waste.</p> <p>Supporting documents were also verified such as below:</p> <p>a. Identification, Segregation and Storage of Waste; Date: Updated: 18/02/2022.</p> <table border="1" data-bbox="1137 1070 1904 1372"> <thead> <tr> <th data-bbox="1137 1070 1391 1120">Source</th> <th data-bbox="1397 1070 1904 1120">Management Plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 1125 1391 1289">Scheduled Waste</td> <td data-bbox="1397 1125 1904 1289"> <ul style="list-style-type: none"> • Identification, storage • Collection and disposal • eSWIS • Pollution control devices </td> </tr> <tr> <td data-bbox="1137 1294 1391 1372">Domestic Waste</td> <td data-bbox="1397 1294 1904 1372"> <ul style="list-style-type: none"> • Identification, segregation and storage • Collection </td> </tr> </tbody> </table>	Source	Management Plan	Scheduled Waste	<ul style="list-style-type: none"> • Identification, storage • Collection and disposal • eSWIS • Pollution control devices 	Domestic Waste	<ul style="list-style-type: none"> • Identification, segregation and storage • Collection 	Complied
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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><u>Genting Sabapalm POM</u></p> <p>Genting Sabapalm Oil Mill has established and maintained a procedure to manage and handle domestic waste hazardous waste such as scheduled waste as guidance and reference. Sampled in Sustainability Management Procedure Manual under a Landfill and Domestic Waste Management (SMP-GPB-12) Rev. 02 dated 01/12/14.</p> <p>Another procedure to manage domestic waste titled Recyclable Waste Management (SMP-GPB-13) Rev.00 dated 11/10/13.</p> <p>Also established and documented a Scheduled Waste management (SMP-GPB-11) Rev.02 dated September 2020.</p>	Complied						

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		<p>Sighted a Consignment Note:</p> <ul style="list-style-type: none"> • No. 2022411116U1FFWZ0 dated 11/04/22 for SW 410 Cotton rags contaminated with SW (0.0230 MT) disposed to Lagenda Bumimas Sdn Bhd. • No. 2022041111606MAKP dated 11/04/22 for SW 410 Used Filters from genset/vehicle (0.0240 MT) disposed to Lagenda Bumi Mas Sdn Bhd. • No. 20220411116NP9485 dated 11/04/22 for SW 102 Used Battery (0.0400 MT) disposed to Lagenda Bumi Mas Sdn. Bhd. • No. 2022041116B4ZYM dated 11/04/22 for SW 409 Bag/empty containers disposed to Lagenda Bumi Mas Sdn Bhd. • No. 2022041115NUO7ZK dated 11/04/22 for SW 323 Used Chemicals (Halogenated organic solvents disposed to Lagenda Bumi Mas Sdn Bhd. • No. 2022041116TXDSPM dated 11/04/22 for SW 305 Spent Lubricating Oil (0.2000 MT) disposed to Lagenda Bumi Mas Sdn. Bhd. <p>Previous disposal was on 10/01/22 (SW 410 Cotton Rags Contaminated with SW), 18/09/21 (SW 410 Cotton Rags contaminated with SW), 18/09/21 (SW 410 Used Filters from genset/vehicles), 18/09/21 (SW 305 Spent lubricating Oil), 18/09/21 (SW 323 Used Chemicals -waste of halogenated organic solvents), Generally the period of disposal from 18/09/21 to 11/04/23 is about 7 months however sighted an email dated 09/03/22 from SW Competent Person (Ronlie Ronney) to Joanne (Legenda Bumi Mas Sdn Bhd) submitting of inventory of Scheduled Waste and requesting for quotation for disposal asap. Quotation received dated 22/03/22. .</p>	
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		<p><u>Genting Sabapalm Estate</u> Ref.: Sustainability Management Procedure Manual, SMP-GPB-12, rev. 1, dated 1/12/2014. Based on interview and site verification, it was noted that the proper disposal of wastes was understood by the workers and management. Scheduled Waste was disposed via licensed waste manager and records of disposal was available for verification as below:</p> <ul style="list-style-type: none"> a. SW102 – Spent Batteries; Consignment Note Number: 2022041120PGYUI8; Date: 11/04/2022; Quantity: 0.0400; Facility: Lagenda Bumimas Sdn Bhd. b. SW410 – Spent Filters; Consignment Note Number: 202204116X51PN0; Date 11/04/2022; Quantity: 0.1800; Facility: Lagenda Bumimas Sdn Bhd. c. SW305 – Spent Lubricating Oil; Consignment Note Number: 2022041118BISKD1; Date 11/04/2022; Quantity: 1.4000; Facility: Lagenda Bumimas Sdn Bhd. d. SW410 – Spent Filters; Consignment Note Number: 202204116X51PN0; Date 11/04/2022; Quantity: 0.1800; facility: Lagenda Bumimas Sdn Bhd. 	
7.3.3	<p>The unit of certification does not use open fire for waste disposal. - Minor compliance -</p>	<p>As under a Landfill and Domestic Waste Management (SMP-GPB-12) Rev. 02 dated 01/12/14, stated under para 7.0 Open Burning mentioned open burning of any type of waste at the landfill us strictly prohibited. During site visit in workers housing, filed in Sapi and Klagan Divisions, Chemical Store, Mill not sighted any burning of waste practices.</p> <p>Verification and interview with employees at the estate have concluded that there was no use of fire in wastes disposal. Domestic and household wastes were disposed via landfill and based on the</p>	Complied

		site visit to the estate’s landfill, it was observed that all domestic waste were sent to the landfill and buried.	
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	<p>The estates are guided by the following Manuals and SOPs to ensure Good Agricultural practices throughout the operation:</p> <ol style="list-style-type: none"> 1. Genting Plantations Oil Palm Manual (OPM) issued on 09.11.1999 2. Sustainability Management Procedure Manual 01.08.2013 revised in 07.02.2019. 3. Environmental Control Procedure – 01.09.2018 4. Standard Operating Procedure (West Malaysia Estates) 01.01.2011. 5. Best Management Practices (BMP) for cultivation of Oil Palm on marginal Soils, by Genting Plantations Research Centre, Sabah. <p>The soil fertility and yield enhancement are described in detail in the Oil Palm Manual under the following sections:</p> <ol style="list-style-type: none"> 1. Oil Palm Manual - No 7; Manuring of Oil Palm 2. Oil Palm Manual - No 13; Managing Difficult Soils 	Complied
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	<p>Plant Test Report (Tissue Sampling) was done for Genting Sabapalm Estate by Genting Plantations Research Centre on 28/07/2021 (Test Report Number: PR26/2021. The report was issued to the estate on 06/09/20121 and was available for verification.</p> <p>The Soil Survey was done for the Genting Sabapalm Estate by Genting Plantations Research Centre on 21/12/2020. The Soil Test Report was issued on 13/02/2021 and available for verification.</p>	Complied

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>EFB was received from the Genting Sabapalm Oil Mill and supplied to Genting Sabapalm Estate for mulching purpose at the replanting areas. Records of application were maintained by the estates and were applied in accordance with the SOP at 20 – 40 mt/ha. Sampled the records of application (Mt) as below:</p> <table border="1" data-bbox="1137 539 1926 742"> <thead> <tr> <th>Division</th> <th>Jan 22</th> <th>Feb 22</th> <th>Mar 22</th> </tr> </thead> <tbody> <tr> <td>Bangkawat</td> <td>1308.69</td> <td>1351.98</td> <td>1468.35</td> </tr> <tr> <td>Sapi</td> <td>324.28</td> <td>11.65</td> <td>-</td> </tr> <tr> <td>Klagan</td> <td>-</td> <td>11.78</td> <td>-</td> </tr> </tbody> </table>	Division	Jan 22	Feb 22	Mar 22	Bangkawat	1308.69	1351.98	1468.35	Sapi	324.28	11.65	-	Klagan	-	11.78	-	Complied
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7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Records of fertilisers input is maintained in Genting Plantations Research Centre - 2022 Fertiliser Program for Genting Sabapalm Estate, which have the information about type of fertiliser, quantity (bags and kg), dates of application and field number. Verification of records confirmed that the applied fertilisers were tally with the agronomist recommendation. The application of the fertilizers is recorded in the program upon completion of each field.</p>	Complied																
Criterion 7.5: Practices minimise and control erosion and degradation of soils.																			
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Map of Genting Sabapalm Estate, Fragile/Marginal Soil Map was available for verification in the estate. The map was prepared by Genting Plantations Research Centre Sabah (GPRCS) and updated on 15/07/2015. The soil map states tat the estate consists of 2822.00 ha of Mineral Soil (64.85%), 1325.00 Ha of Peat Soil (30.45%) and 204.74 Ha of Acid Sulphate Soil (4.70%).</p>	Complied																
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</p>	<p>As per Slope map (analysis based on SRTM90) dated 10 Oct 2018 by GPRCS (Genting Plantation Research Centre Sabah) showed: -</p> <table border="1" data-bbox="1137 1347 1926 1388"> <thead> <tr> <th>Terrain Classes</th> <th>Area (Ha)</th> <th>Percentage</th> </tr> </thead> <tbody> </tbody> </table>	Terrain Classes	Area (Ha)	Percentage	Complied													
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	contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	Flat (0° - 2°)	3504.01	80.43%	
		Undulating (2° - 6°)	780.22	12.91%	
		Rolling (6° - 12°)	72.59	1.67%	
		Hilly (12° - 20°)	0.00	-	
		Steep (20° - 25°)	0.00	-	
		Very Steep (>25°)	0.00	-	
		The Slope Map indicated that there were no steep slopes in Genting Sabapalm Estate therefore the estate does not require approval from the state government for replanting.			
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting of oil palm in Sabapalm estate. As per record, the highest terrain only 12 degree as per Slope map (analysis based on SRTM90) dated 10 Oct 2018 by GPRCS (Genting Plantation Research Centre Sabah). Detail can be referred indicator 7.5.2.			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 -	The Fragile/Marginal Soil Map (Updated: 15/07/2015) and Slope Map (Dated 10 Oct 2018) by GPRCS (Genting Plantation Research Centre Sabah) were used and taken into account while planning operations in the estate. Soil surveys and Foliar samplings were done on regularly and available for Sabapalm Estate. The plans and operation followed as per recommendation by the GPRCS to sustain suitability of land for palm oil cultivation.			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.	Peat Soil and Acid Sulphate Soil consist of 35.15% of the estate land. Hence, the management have done extensive planting on these soil in the estate. Nevertheless, the management of the areas			Complied

	- Minor compliance -	are in accordance with the Best Management Practises (BMP) for cultivation of Oil Palm on marginal Soils, by Genting Plantations Research Centre, Sabah.	
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil Surveys and Topographic information were available and used as a guidance for planning operational works such as manuring, drainage and irrigation and roads among others. Peat Drainability Report dated 23/03/2021 were prepared by Genting Plantations Research Centre, Sabah for planning drainage and irrigation at areas with peat.	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 was no new planting on peat within the Genting Sabapalm 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 -	The Peat Inventory was available in the Map of Genting Sabapalm Estate, Fragile/Marginal Soil Map and available for verification in the estate. The map was prepared by Genting Plantations Research Centre Sabah (GPRCS) and updated on 15/07/2015. The soil map states that the estate consists of 2822.00 ha of Mineral Soil (64.85%), 1325.00 Ha of Peat Soil (30.45%) and 204.74 Ha of Acid Sulphate Soil (4.70%). Genting Plantation Berhad have submitted the Peat Inventory for the organisation to RSPO on 15/11/2019 and RSPO have acknowledged received on 27/11/2019. The records of commination were available for verification.	Complied
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	The subsidence soil monitoring was done annually in Genting Sabapalm Estate. Visit to the Soil Subsidence Pole on 13/04/2022 indicated o movement from the previous record for subsidence soil.	Complied

		Piezometer was available in the estate as well to monitor the water level of the peat areas. Monitoring was done on a weekly basis and records were available for verification. During the visit to the Piezometer, the reading was recorded at 75cm which is within the required range.	
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The management of the Peat areas are in accordance with the Best Management Practises (BMP) for cultivation of Oil Palm on marginal Soils, by Genting Plantations Research Centre, Sabah.</p> <p>Peat Drainability Report dated 23/03/2021 were prepared by Genting Plantations Research Centre, Sabah for planning drainage and irrigation at areas with peat.</p> <p>Piezometer was available in the estate as well to monitor the water level of the peat areas. Monitoring was done on a weekly basis and records were available for verification. During the visit to the Piezometer, the reading was recorded at 75cm which is within the required range.</p>	Complied
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>	<p>The management of the Peat areas are in accordance with the Best Management Practises (BMP) for cultivation of Oil Palm on marginal Soils, by Genting Plantations Research Centre, Sabah.</p> <p>Peat Drainability Report dated 23/03/2021 were prepared by Genting Plantations Research Centre, Sabah for planning drainage and irrigation at areas with peat. There is evidence that the report prepared is according to RSPO Drainability Assessment Procedure Version 02 dated October 2021 and all requirement in the checklist has been included.</p> <p>Total 1,325Ha out of 3,947.20Ha is peat area that has been planted with oil palm which is around 33.50% of total land area. There is no replanting has been done at peat area. As per assessment done, it has been confirmed that peat drainability is in place where there is no significant incidence of backflow of water observed. The</p>	Complied

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	- Critical (Major) compliance -	management has established plan to re construct suitable carrier drains and additional monitoring. The minimum natural drainability threshold has been met.	
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>The existing planting on peat area are managed according to the RSPO manual on Best Management Practices such as water table management, piezometer motoring and etc.</p> <p>The management of the Peat areas are in accordance with the Best Management Practises (BMP) for cultivation of Oil Palm on marginal Soils, by Genting Plantations Research Centre, Sabah.</p> <p>Peat Drainability Report dated 23/03/2021 were prepared by Genting Plantations Research Centre, Sabah for planning drainage and irrigation at areas with peat.</p>	Complied
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Not applicable because no unplanted and set-aside peatlands in the managed area.	Complied
<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>Genting Sabapalm POM</p> <p>Water Management Plan for Raw Water & Drinking Water (as per SOM-LAB-12 & SOP-LAB-03) was established and documented by Genting Sabapalm Oil Mill dated 01/03/22. The content included:</p> <ul style="list-style-type: none"> • Objectives of the Water Management Plan. • Source of Water from Sg. Labuk and Sg Sualog 1 & 2 (in drought season if needed). • Operational Procedure for raw water treatment plant. Use of soda ash to get the right pH and other treatment process before pump into overhead water tank to be used. Raw water is supply 24 hours for housing consumption. • Monitoring and measurement. Sampling by lab as testing procedure. • Management responsibilities including training. <p>On 26/08/16, Genting Sabapalm has sent an application letter to Jabatan Pengairan dan Saliran Sabah for application to extract water from Sg. Labuk for mill operation and domestic use under Section 17 of Sabah Water Resources Enactment 1998. (required to comply with water flow release) Available a quotation from Chemsain Konsultant Sdn Bhd dated 28/03/19 to conduct Water Availability and Environmental Flow Study for Genting Sabapalm Estate, Sandakan, Sabah.</p> <p>Available Drinking Water Analysis conducted by DynaKey Laboratory Sdn Bhd for 23 parameters and result as below:</p> <p>(Water quality Standard based on National Standard for Drinking Water Quality Version 2, January 2004 by Engineering Services Division, Ministry of Health Malaysia).</p> <table border="1" data-bbox="1144 1326 1919 1374"> <tr> <td>Parameters</td> <td>Standard</td> <td>26/01/22</td> <td>19/12/21</td> </tr> </table>	Parameters	Standard	26/01/22	19/12/21	<p>Complied</p>
Parameters	Standard	26/01/22	19/12/21				

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		pH	6.5-9.0	7.3	7.5
		Colour@pH, True Colour	ND (,5) at pH 7.3	ND	ND (<5)
		Turbidity, NTU	5	5.7	1.1
		Free Cl ₂ , (mg/L)	0.2-5.0	ND (<0.2)	ND (<1.8)
		Aluminium (mg/L)	0.2	0.02	ND (<0.02)
		Ammonical Nitrogen (mg/L)	1.5	0.07	0.02
		Anionic Detergent as MBAS (mg/L)	Not listed	ND	ND
		Arsenic (mg/L)	0.01	ND (<0.01)	ND (<0.01)
		Cadmium (mg/L)	0.003	ND (<0.0001)	ND (<0.0001)
		Chromium (mg/L)	0.05	ND (<0.001)	ND (<0.0001)
		Copper (mg/L)	1.0	ND (<0.06)	ND (<0.06)
		Cyanide (mg/L)	0.07	ND (<0.01)	ND (<0.01)
		Fluoride (mg/L)	04-06	ND (0.05)	ND (0.05)
		Iron (mg/L)	0.3	0.409	0.059
		Lead (mg/L)	0.01	ND (<0.001)	ND (<0.001)
		Manganese (mg/L)	0.1	ND (<0.001)	ND (<0.001)

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Nitrate (mg/L)	10	0.16	ND (<0.07)
Sulphate (mg/L)	250	3.0	3.1
Total Dissolved Solid (mg/L)	1,000	70	72
Total Hardness (EDTA) (mg/L)	500	48.0	40.6
Zink (mg/L)	3	ND (<0.006)	ND (<0.006)
E.Coli (Present/Absent)	ND in 100ml	ND (<1.8)	ND (<2)
Total Coliform (Present/Absent)	ND in 100ml	ND (<1.8)	20

Genting Sabapalm Estate

- a. Genting Sabapalm Estate has established its Water Management Plan dated 14/01/2022. The objective of the plan is to conserve the potable water. Apart from that, in order to maintain the availability of surface and ground water, water management plan for peat area, flooded area, protection of water courses & wetlands, pollution prevention through establishment of riparian zones and management of water table through installation of water gates.
- b. Genting Sabapalm Estate does not restrict access to clean water for its workers. The estate is divided into 4 divisions namely Sapi Division, Kwan Division, Bangkawat Division and Klagan Division. The certification unit has its own water treatment plant where they treat water from the reservoir for domestic use.

Water for the Mill Sapi Division and Kwan Division is provided by the mill's water treatment plant while the water for Bangkawat and Klagan Division were provided by the Water treatment Plant in Bangkawat Division.

Water sampling points were identified, and water samples were regularly taken and tested to monitor the water quality to ensure it complies with the National Standard for Drinking Water Quality. Results of water sampling was available as below:

- Certificate of Analysis; Sample Marking: Labour Quarter (Air Terawat); Lab Ref Number: W220219/01; Date of Sample Received: 19/02/2022; Results: Fecal Coliform not detected.
- Certificate of Analysis; Sample Marking: Labour Quarter (Air Terawat); Lab Ref Number: W220219/02B; Date of Sample Received: 19/02/2022; Results:

Parameters	Results
pH Value	7.7 @ 25°
Turbidity, NTU	0.35
Suspended Solids	ND
BOD	0.1
COD	ND
AN (NH ₃ -N)	0.02

7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm Estate covers an area of approximately 4,360.33 ha and divided into 4 divisions, namely Sapi, Bangkawat, Kwan and Klagan Divisions. The estate is surrounded by the Labuk River and its tributaries forming an island. The water from the Labuk River is used not only for Sabapalm Oil Mill but for the community within the main office.</p> <p>Riparian buffer belts have been established along all these rivers and verified during the site visit. The management have erected signages prohibiting of works such as manuring and spraying, trespassing and encroachments as well as fishing to be done within the riparian buffers. The buffers have been clearly demarcated by painting the trees at the end of the buffer for clear identification. During the visit there were no evidence of chemical or manuring works being done at the riparian reserves. Workers have been provided awareness trainings and documents of trainings were available for verification.</p>	Complied																
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>Genting Sabapalm POM established and documented SOP Effluent Treatment Plant (SOM-LAB-15) Rev. 00 dated 01/05/12. The mill is disposing its effluent through land irrigation in the field. The quality of discharged effluent was analysed every month at Final Discharge Point in Block 5 and submitted to DOE</p> <p>T, pH, BOD, COD, TS, SS, O&G, AN and TN.</p> <p>Mill effluent discharge into facultative Pond 2 and land application, from the DOE approval the BOD must not be more than 500mg/l. From the sampling result as below:</p> <table border="1" data-bbox="1137 1225 1921 1375"> <thead> <tr> <th>Month (Sample Date)</th> <th>pH (25 °C)</th> <th>BOD (mg/L)</th> <th>COD (mg/L)</th> <th>SS (mg/L)</th> <th>TN (mg/L)</th> <th>AN (mg/L)</th> <th>O&G (mg/L)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Month (Sample Date)	pH (25 °C)	BOD (mg/L)	COD (mg/L)	SS (mg/L)	TN (mg/L)	AN (mg/L)	O&G (mg/L)									Complied
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		11/03/22	8.3	82.6	791	100	147	105.6	16.6																	
		23/02/22	7.9	139	975	133	160.1	127.5	23.4																	
		26/01/22	8.0	157.5	1,231	270	193.2	134.4	19.6																	
		19/12/21	8.2	227	1,500	158	253.1	167.1	8.6																	
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>Genting Sabapalm Oil Mill has monitored and recorded a mill water use per tonne FFB on monthly basis for usage in mill process, boiler and domestic as sampled in 2021 and 2022 below:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>FFB Processed (MT)</th> <th>Total Water Consumption (MT)</th> <th>Water Usage per FFB Processed</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>126,356</td> <td>475,369</td> <td>0.85</td> </tr> <tr> <td>2021</td> <td>116,373.43</td> <td>346,639</td> <td>0.85</td> </tr> <tr> <td>2022 (Jan-Mac)</td> <td>20,493.38</td> <td>71,961</td> <td>0.67</td> </tr> </tbody> </table>								Year	FFB Processed (MT)	Total Water Consumption (MT)	Water Usage per FFB Processed	2020	126,356	475,369	0.85	2021	116,373.43	346,639	0.85	2022 (Jan-Mac)	20,493.38	71,961	0.67	Complied
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<p>Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</p>																										

<p>7.9.1</p>	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -</p>	<p><u>Genting Sabapalm POM</u> As sampled found available Diesel Usage Monitoring for Genset and Process for 2021 and 2021:</p> <table border="1" data-bbox="1137 483 1921 770"> <thead> <tr> <th>Year</th> <th>FFB (MT)</th> <th>CPO (MT)</th> <th>Turbine +Genset (kWh)</th> <th>Total Diesel (Lit)</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>116,374</td> <td>23,673</td> <td>2,276,943</td> <td>91,974</td> </tr> <tr> <td>2022 (Jan-Mac)</td> <td>20,488</td> <td>3,973</td> <td>401,925</td> <td>15,348</td> </tr> </tbody> </table> <p>Yearly Comparison trend as recorded:</p> <table border="1" data-bbox="1137 858 1693 1058"> <thead> <tr> <th>Year</th> <th>Lt/MT FFB</th> <th>Lt/MT CPO</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>1.58</td> <td>0.32</td> </tr> <tr> <td>2021</td> <td>1.27</td> <td>0.26</td> </tr> <tr> <td>2022</td> <td>1.33</td> <td>0.26</td> </tr> </tbody> </table> <p><u>Genting Sabapalm Estate</u> At the estates, the plan to optimise the usage of diesel is by regular maintenance of diesel-powered machinery and educational programme for the operators on fuel saving. At the mill, the utilisation of fibre and shell as biofuel for boiler operation is consistently implemented to generate electricity through turbines. This helps to reduce the dependency to fossil fuel.</p>	Year	FFB (MT)	CPO (MT)	Turbine +Genset (kWh)	Total Diesel (Lit)	2021	116,374	23,673	2,276,943	91,974	2022 (Jan-Mac)	20,488	3,973	401,925	15,348	Year	Lt/MT FFB	Lt/MT CPO	2020	1.58	0.32	2021	1.27	0.26	2022	1.33	0.26	<p>Complied</p>
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		<p>Records of Diesel Consumption for Jan 2017 – Mar 2022 was available for verification in the estate. The records of diesel usage were sampled as below:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>9086</td> <td>9178</td> </tr> <tr> <td>February</td> <td>9016</td> <td>7966</td> </tr> <tr> <td>March</td> <td>11976</td> <td>9037</td> </tr> <tr> <td>April</td> <td>10600</td> <td>-</td> </tr> <tr> <td>May</td> <td>9759</td> <td>-</td> </tr> <tr> <td>June</td> <td>11180</td> <td>-</td> </tr> <tr> <td>July</td> <td>10331</td> <td>-</td> </tr> <tr> <td>August</td> <td>11427</td> <td>-</td> </tr> <tr> <td>September</td> <td>10526</td> <td>-</td> </tr> <tr> <td>October</td> <td>11711</td> <td>-</td> </tr> <tr> <td>November</td> <td>10118</td> <td>-</td> </tr> <tr> <td>December</td> <td>10539</td> <td>-</td> </tr> </tbody> </table>	Month	2021	2022	January	9086	9178	February	9016	7966	March	11976	9037	April	10600	-	May	9759	-	June	11180	-	July	10331	-	August	11427	-	September	10526	-	October	11711	-	November	10118	-	December	10539	-	
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Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -</p>	<p>Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p>	Complied
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		The emission value is recorded and calculated through the utilisation of RSPO's Palm GHG Calculator ver. 4.	
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit.	Not Applicable
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment, among the identified sources of gaseous emissions were boiler chimney, diesel engines and POME to name a few. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring for dust particulate.	Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	Based on the site visit of the replanting area at the estate, there was no evidence that fire had been used for land preparation. Oil palms were felled, chipped, and windrowed.	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	Genting Plantation Berhad; Standard Operating Procedure; Fire Prevention and Control Measures; Doc Number: SDP-PD-12 Revision: 00; Issue Date: Oct 2020 has been established and available for verification.	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>The above-mentioned fire prevention and control measures were communicated to the stakeholders via providing the procedure to the identified stakeholders. The stakeholders have acknowledged received of the document and it was available for verification.</p> <p>Among the stakeholder's acknowledgment verified were:</p>	Complied

		<ul style="list-style-type: none"> a. Balai Polis Tagas-Tagas. b. Ketua Kampong Tembidong, Bidong. c. Sekolah Kebangsaan Tagas Tagas. d. Sekolah Kebangsaan Sabapalm e. Klinik Tagas Tagas f. Ketua Kampung Tagas Tagas g. Styland Plantations. 	
<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>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm Estate and supply base did not carry out any new plantings since November 2005. Therefore, this indicator is not applicable during this assessment. The immature areas are of replanted area.</p>	Complied
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <ul style="list-style-type: none"> 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. 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>PROCEDURAL NOTE:</p>	<p>Inventory on HCV Sites Within Genting Plantations Berhad Group of Estates (Sabah Region 1) have been established. The report was prepared by the Sustainability Department, Genting Plantations Berhad. The initial field work started in October 2009 and completed in July 2010.</p> <p>As for Genting Sabapalm Estate, there were 2 areas classified as HCV which is the Riparian Buffer Belt (Labuk River & Bangkawat River) and Burial grounds which has been identified.</p> <p>The management have established an HCV Management and Monitoring Plan which have been reviewed on a yearly basis. The</p>	Complied

	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 -	purpose of the Management Plan is to preserve and conserve the HCVs within the estate's management areas.	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable in Malaysia	Not Applicable
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -	Inventory on HCV Sites Within Genting Plantations Berhad Group of Estates (Sabah Region 1) have been established. The report was prepared by the Sustainability Department, Genting Plantations Berhad. The initial field work started in October 2009 and completed in July 2010. As for Genting Sabapalm Estate, there were 2 areas classified as HCV which is the Riparian Buffer Belt (Labuk River & Bangkawat River) and Burial grounds which has been identified. The management have established an HCV Management and Monitoring Plan which have been reviewed on a yearly basis. The purpose of the Management Plan is to preserve and conserve the HCVs within the estate's management areas.	Complied
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -	Not applicable since there is no right of local communities have been identified in HCV area. As for Genting Sabapalm Estate, there were only 2 areas classified as HCV which is the Riparian Buffer Belt (Labuk River & Bangkawat River) and Burial grounds which has been identified.	Not Applicable
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working	Inventory on HCV Sites Within Genting Plantations Berhad Group of Estates (Sabah Region 1) have been established. The report was prepared by the Sustainability Department, Genting Plantations Berhad. The initial field work started in October 2009 and completed in July 2010.	Complied

	<p>for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>As for Genting Sabapalm Estate, there were 2 areas classified as HCV which is the Riparian Buffer Belt (Labuk River & Bangkawat River) and Burial grounds which has been identified.</p> <p>Based on the report, there were no endangered, rare or threatened species in the estate. A heard of long tailed macaque was sighted at the boundary during the assessment. This was also sighted during the assessment.</p> <p>The management have established an HCV Management and Monitoring Plan which have been reviewed on a yearly basis. The purpose of the Management Plan is to preserve and conserve the HCVs within the estate’s management areas.</p> <p>The management have conducted regular awareness trainings to the workers and nearby communities on protecting the faunas within the area.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>There is no land clearing after November 2005. Nonetheless, educational activities on RTE species were done through a few means such as briefings/training and no hunting signage. Interview with workers showed that they have a good understanding in the restriction of capturing the RTE species.</p> <p>The management have established an HCV Management and Monitoring Plan which have been reviewed on a yearly basis. The purpose of the Management Plan is to preserve and conserve the HCVs within the estate’s management areas.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>Not applicable since there is no land clearing after November 2005</p>	Not Applicable

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020 and 2021** for **Genting Sabapalm POM** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2020** for **Genting Sabapalm POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	28.96
PKO	28.96

Extraction	%
OER	20.45
KER	3.72

Production	t/yr
FFB Process	126,358.37
CPO Produced	25,837.09
PKO Produced	4,701.73

Land Use	Ha
OP Planted Area	3,954.23
OP Planted on peat	1,276.63
Conservation (forested)	8.95
Conservation (non-forested)	0.00
Total	3,947.20

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	33,510.19	0.36	0.00	0.00	0.00	0.00	33,510.19	0.36
CO ₂ Emission from fertilizer	3,996.55	0.04	0.00	0.00	0.00	0.00	3,996.55	0.04
NO ₂ Emission	12,791.80	0.13	0.00	0.00	0.00	0.00	12,791.80	0.13
Fuel Consumption	1,213.04	0.01	0.00	0.00	0.00	0.00	1,213.04	0.01
Peat Oxidation	69,705.62	0.75	0.00	0.00	0.00	0.00	69,705.62	0.75
Sink								
Crop Sequestration	-28,875.51	-0.31	0.00	0.00	0.00	0.00	-28,875.51	-0.31
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	92,341.68	0.99	0.00	0.00	0.00	0.00	92,341.68	0.99

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	13,954.58	0.11
Fuel Consumption	708.60	0.01
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	14,663.18	0.12

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

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The summary of the Net GHG emitted in **2021** for **Genting Sabapalm POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	7.60
PKO	7.60

Extraction	%
OER	20.34
KER	4.12

Production	t/yr
FFB Process	116,379.16
CPO Produced	23,673.767
PKO Produced	4,800.565

Land Use	Ha
OP Planted Area	3,947.20
OP Planted on peat	1,334.23
Conservation (forested)	8.95
Conservation (non-forested)	0.00
Total	3,947.20

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	35,415.32	0.39	0.00	0.00	0.00	0.00	35,415.32	0.39
CO ₂ Emission from fertilizer	5,057.92	0.06	0.00	0.00	0.00	0.00	5,057.92	0.06
NO ₂ Emission	13,916.45	0.15	0.00	0.00	0.00	0.00	13,916.45	0.15
Fuel Consumption	1,298.47	0.01	0.00	0.00	0.00	0.00	1,298.47	0.01
Peat Oxidation	72,848.97	0.80	0.00	0.00	0.00	0.00	72,848.97	0.80
Sink								
Crop Sequestration	-32,274.60	-0.36	0.00	0.00	0.00	0.00	-32,274.60	-0.36
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	96,262.52	1.06	0.00	0.00	119,837.57	0.00	216,100.09	1.06

*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	286.96	0.00
Grid Electricity Utilization	0.00	0.00

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	0.00	0.00

Summary of Kernel Crusher Emission and Credit (if applicable)

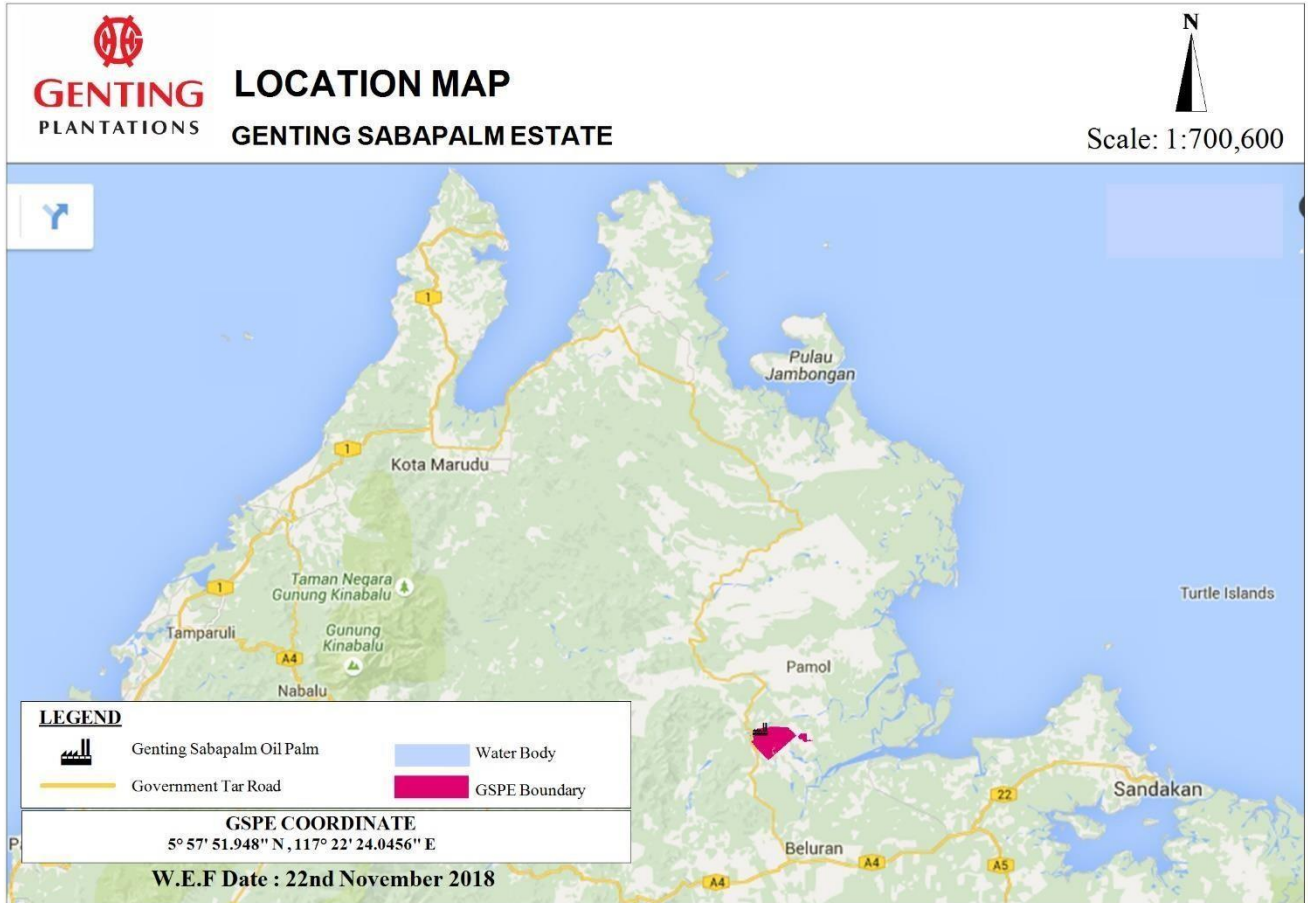
Emissions	tCO₂e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

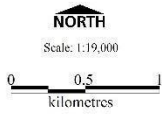
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

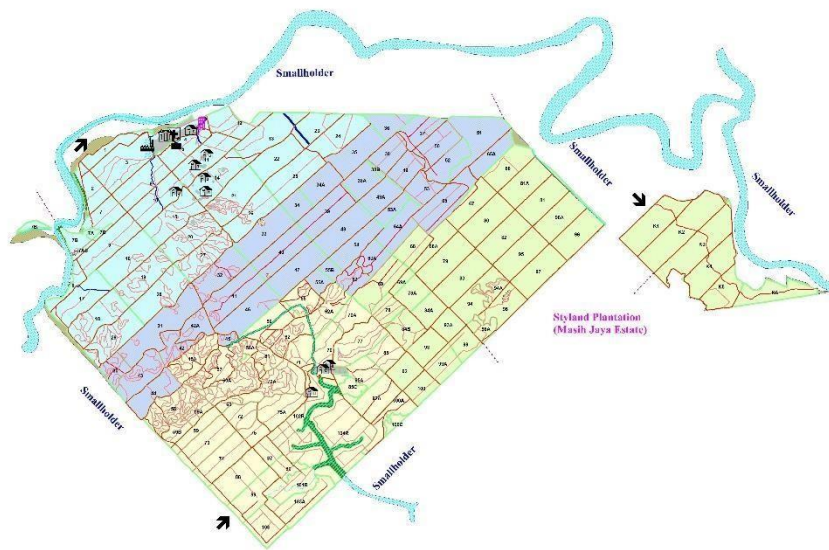
Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



GPS MAP OF GENTING SABAPALM ESTATE



LEGEND

- Boundary Stone
- Office
- Nursery
- Store
- Limestone
- Clinic
- Mill
- School/Idrus
- Mesque
- Inlet of Major River
- Outlet of Major River
- Exit and Entrance
- Block Boundary
- Main Road
- Submain Road
- Stakeholder Boundary
- Water Body
- Riparian
- Stream
- Main Drain
- Building/Infrastructure
- Cattle Area
- Quarry
- Division Sapi
- Division Ewau
- Division Klagan
- Division Bangkawat
- Undeveloped Area



GSPL Coordinate: 5.965087 N, 117.374117 E
 Projection: Longitude-Latitude
 Datum: WGS 84
 Data Source: Field Survey Using Garmin
 Prepared by:
 Genting Plantations Research Centre Sabah (GPRCS)
 Date Updated: 15 July 2015

GENTING PLANTATIONS BERHAD
 GENTING SABAPALM ESTATE
 P. O. BOX NO. 901,
 90701 SANDAKAN,
 SABAH.

Appendix E: List of Smallholder Registered and sampled

Not applicable

Appendix F: List of Abbreviations

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