

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

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

<b>Client Company name (Parent Company):</b> <b>FGV Holdings Berhad</b>
Client company Address: Level 20 West, Wisma FGV, Jalan Raja Laut, 50350, Kuala Lumpur, Malaysia.
Certification Unit: <b>FGV Palm Industries Sdn Bhd- Belitong Palm Oil Mill</b> Location of Certification Unit: KM 28, Jalan Kluang/Kota Tinggi 86000 Kluang, Johor, Malaysia
Date of Final Report: 09/03/2022

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## Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	FGV Holdings Berhad		
<b>RSPO Membership Number</b>	1-0225-16-000-00	<b>Membership Approval Date</b>	27/12/2016
<b>Address</b>	Level 20 West, Wisma FGV, Level 20 West, Jalan Raja Laut, 50350, Kuala Lumpur, Malaysia.		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	FGV Palm Industries Sdn Bhd - Belitong Palm Oil Mill		
<b>Location / Address</b>	KM 28, Jalan Kluang/Kota Tinggi 86000 Kluang, Johor, Malaysia		
<b>Website</b>	http://www.fgvholdings.com		
<b>Management Representative</b>	Mr Ameer Izyanif Bin Hamzah	<b>E-mail</b>	ameer.h@fgvholdings.com
<b>Telephone</b>	03-27891338	<b>Facsimile</b>	+603 2789 0001

2. Certification Information			
<b>Certificate Number</b>	RSPO 693230	<b>Certificate Start Date</b>	07/02/2019
<b>Date of First Certification</b>	07/02/2019	<b>Certificate Expiry Date</b>	06/02/2024
<b>Scope of Certification</b>	Production of Palm Oil and Palm Kernel		
<b>Visit Objectives</b>	The objective of the ASA 3 assessment is to conduct a certification assessment to ensure the elements of the scope of registration and the requirements of the management standard are effectively addressed by FGVPIB Belitong POM 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.		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	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		
<b>Supply Chain Module</b>	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	50 mt/hour
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 693232	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 3	BSI Services Malaysia Sdn Bhd	20/05/2024
MSPO 693234	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	20/05/2024
SCCS03429	MSPO SCCS 2018	Trans Certification International Sdn Bhd	26/03/2025

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
FGVPISB Belitong Palm Oil Mill	KM 28, Jalan Kluang/Kota Tinggi 86000 Kluang, Johor, Malaysia	1° 56' 18.00" N	103° 29' 55.00" E
FGVPM Bukit Tongkat B Estate	Ladang FGVPM Bukit Tongkat B, 86000 Kluang, Johor, Malaysia	1° 56' 29.00" N	103° 30' 14.00" E
FGVAS Ulu Belitong Estate	Stesen FGVPM Ulu Belitong, 86000 Kluang, Johor, Malaysia	1° 56' 22.00" N	103° 28' 39.00" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
FGVPM Bukit Tongkat B Estate	970.25	0	267.60	1,237.85	78%
FGVAS Ulu Belitong Estate	127.37	0	20.33	147.70	86%
<b>Total</b>	<b>1,097.62</b>	<b>0</b>	<b>287.93</b>	<b>1385.55</b>	<b>79%</b>

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
FGVPM Bukit Tongkat B Estate	176.15	678.29	0	0	115.81	794.10	176.15
FGVAS Ulu Belitong Estate	0	81.33	46.04	0	0	127.37	0

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<b>Total (ha)</b>	<b>176.15</b>	<b>759.62</b>	<b>46.04</b>	<b>0</b>	<b>115.81</b>	<b>921.47</b>	<b>176.15</b>
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<b>7. Summary of Certified Tonnage of FFB (Own Certified Scope)</b>				
<b>Estate / Smallholders</b>	<b>Tonnage / year</b>			
	<b>Estimated last year (Feb 2021 – Jan 2022)</b>	<b>Actual (Dec 2020 – Oct 2021)</b>		<b>Forecast (Feb 2022 – Jan 2023)</b>
		<i>Previous license period (Dec 2020 – Jan 2021)</i>	<i>Current license period (Feb 2021 – Oct 2021)</i>	
FGVPM Bukit Tongkat B Estate	22,000.00	2,202.85	10,981.29	17,519
FGVAS Ulu Belitong Estate	3,000.00	566.14	2,822.24	3,486
<b>Total</b>	<b>25,000.00</b>	<b>16,572.52</b>		<b>21,005.00</b>
<b>Note:</b> Low crop due to replanting.				

<b>8. Summary of Certified Tonnage of FFB (from other certified unit(s))</b>				
<b>Estate / Smallholders</b>	<b>Tonnage / year</b>			
	<b>Estimated last year (Feb 2021 – Jan 2022)</b>	<b>Actual (Dec 2020 – Oct 2021)</b>		<b>Forecast (Feb 2022 – Jan 2023)</b>
		<i>Previous license period (Dec 2020 – Jan 2021)</i>	<i>Current license period (Feb 2021 – Oct 2021)</i>	
Nil				
<b>Total</b>		<b>N/A</b>		

<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
<b>Out growers / smallholders</b>	<b>Tonnage / year</b>			
	<b>Estimated last year (Feb 2021 – Jan 2022)</b>	<b>Actual (Dec 2020 – Oct 2021)</b>		<b>Forecast (Feb 2022 – Jan 2023)</b>
		<i>Previous license period (Dec 2020 – Jan 2021)</i>	<i>Current license period (Feb 2021 – Oct 2021)</i>	
Smallholder	-	21,515.96	13,4378.51	-
<b>Total</b>	<b>-</b>	<b>155,894.47</b>		<b>-</b>

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<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	12/2020	1600.39	12047.7	13648.09
2	01/2021	1168.6	9468.26	10636.86
3	02/2021	1016.4	8363.06	9379.46
4	03/2021	1301.64	13505.78	14807.42
5	04/2021	1255.13	12754.63	14009.76
6	05/2021	1648.79	14302.93	15951.72
7	06/2021	1726.54	16394.01	18120.55
8	07/2021	1708.38	16226.75	17935.13
9	08/2021	1959.58	19513.51	21473.09
10	09/2021	1599.78	15449.33	17049.11
11	10/2021	1587.29	17868.51	19455.8
<b>TOTAL</b>		<b>16,572.52</b>	<b>155,894.47</b>	<b>172,466.99</b>

<b>10. Summary of Certified Tonnage (not applicable for ISS)</b>			
Estimated last year (Feb 2021 – Jan 2022)	Actual (Dec 2020 – Oct 2021)		Forecast (Feb 2022 – Jan 2023)
	Previous license period (Dec 2020 – Jan 2021)	Current license period (Feb 2021 – Oct 2021)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
25,000.00	2768.99	13803.53	21,005.00
	16,572.52		
<b>CPO (OER: 20.5 %)</b>	<b>CPO (OER: 20.91 %)</b>		<b>CPO (OER: 20.50 %)</b>
5,125.00	579.00	2886.30	4,306.00
	3,465.30		
<b>PK (KER: 5.50 %)</b>	<b>PK (KER: 5.45 %)</b>		<b>PK (KER: 5.30 %)</b>
1,375.00	150.91	752.29	1,113.00
	903.20		

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<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	12/2020	334.64	87.22
2	01/2021	244.35	63.69
3	02/2021	212.53	55.39
4	03/2021	272.17	70.94
5	04/2021	262.45	68.40
6	05/2021	344.76	89.86
7	06/2021	361.02	94.10
8	07/2021	357.22	93.11
9	08/2021	409.75	106.80
10	09/2021	334.51	87.19
11	10/2021	331.90	86.50
<b>TOTAL</b>		<b>3,465.30</b>	<b>903.20</b>

<b>11. Summary of Actual Volume sold</b>					
<b>Current License period (Feb 2021 – Oct 2021)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>Others</b>		
<b>CPO (MT)</b>	333.33	-	-	2176.13	2509.46
<b>PK (MT)</b>	646.64	-	-	-	646.64
<b>Credits</b>					
<b>Previous License period (Dec 2020 – Jan 2021)</b>					
<b>CPO (MT)</b>	-	-	-	-	-
<b>PK (MT)</b>	-	-	-	-	-
<b>Credits</b>	-	-	-	-	-

<b>11A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Palmtrace Trading License Number</b>	<b>Certified CPO Sold (mt)</b>	<b>Certified PK Sold (mt)</b>
1	A	RSPG6618F	-	45.19

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2	B	RSPG6340F	-	117.22
3	C	RSPG6165F	-	111.16
4	D	RSPG5891F	-	68.31
5	E	RSPG5721F	-	89.44
6	F	RSPG5503F	-	29.87
7	G	RSPG5126F	-	9.36
8	H	RSPG4929F	-	46.5
9	I	RSPG4744F	-	78.7
10	J	RSPG4580F	-	26.99
11	K	RSPG4580F	-	23.9
12	L	RSP054692A	208.87	-
13	M	RSP054690A	124.46	-
<b>TOTAL</b>			<b>333.33</b>	<b>646.64</b>

<b>11B. Records of CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	Nil			
<b>TOTAL</b>				

<b>11C. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	A	547	
2	B	1,189.23	-
3	C	332.90	-
4	D	107	-
<b>TOTAL</b>		<b>2,176.13</b>	<b>-</b>

<b>11D. Records of Certified CPO Sold under RSP0 Credits since the last audit (if any)</b>			
No.	Buyers Name	PalmTrace Trading License Number	RSP0 Credits of Certified CPO Sold (mt)



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	Nil		
<b>TOTAL</b>			

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

<b>13. Independent Smallholders Actual Sold Tonnage / Volume</b>						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
<b>Current License period (Nov 2020 – Jan 2021)</b>						
<b>Credits</b>				N/A	N/A	N/A
<b>Physical</b>	N/A	N/A	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](mailto:Nicholas.Cheong@bsigroup.com))  
Website: [www.bsigroup.com](http://www.bsigroup.com)

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

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **22-25/11/2021**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **11/2/2022**. 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 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.

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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**

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
FGVPISB Belitong Palm Oil Mill	✓	✓	✓	✓	✓
FGVPM Bukit Tongkat B Estate	✓	✓	✓	✓	✓
FGVASSB Ulu Belitong Estate	✓	✓	✓	✓	✓

**Tentative Date of Next Visit: October 31, 2022 - November 4, 2022**

**Total Number of Mandays: 10**

**2.2 BSI Assessment Team**

<b>Name</b>	<b>Role</b>	<b>Competency</b>
Muhamad Naquiuddin Mazeli (MNM)	Team Leader	<p><b>Education:</b> Bachelor Science Horticulture of University Putra Malaysia</p> <p><b>Work Experience:</b> 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, managed, implement and monitors the RSPO, ISCC, MSPO and ISO9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company.</p> <p><b>Training attended:</b> ISO 9001: 2015 LA Training(2019), ISO 14001: 2015 LA Training (2018), ISO 45001: 2018 LA Training (2018), HCV &amp; HCS Training (2019), RSPO P&amp;C LA Training(2018), MSPO LA Training ( 2018), SMETA Training (2021), SCCS Training and Refresher (2019)</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, Smallholders inclusion, legal requirements, environment, RSPO supply chain and HCV.</p> <p><b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English Language.</p>

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<p>Hu Ning Shing (HNS)</p>	<p>Team Member</p>	<p><b>Education:</b> Bachelor Degree in Science majoring in Applied Chemistry of University Malaya.</p> <p><b>Work Experience:</b> 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body.</p> <p><b>Training attended:</b> ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&amp;C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015, Endorsed MSPO Auditor, MSPO SCCS Lead Auditor Course in 2019, RSPO Social Audit Training in 2019, SMETA Requirements Training in 2021 and ISO 45001 Lead Auditor Course in 2021.</p> <p><b>Aspect covered in this audit:</b> During this assessment, she assessed the policy and commitment, social requirements, contract agreement, human rights, workers' welfare, stakeholder consultation, legal requirements, land &amp; legal issue and RSPO supply chain requirements.</p> <p><b>Language proficiency:</b> Fluent in in both verbal/written English, Bahasa Malaysia and Chinese</p>
<p>Vijay Kanna Pakirisamy (VKP)</p>	<p>Team Member</p>	<p><b>Education:</b> Bachelor's degree in Agribusiness Science Management with Honours of University Utara Malaysia</p> <p><b>Work Experience:</b> 10 years working experience as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad. Throughout his 10 year tenure in the oil palm industry, he has been part of the operations team that implements standards within the estate such as RSPO, MSPO, ISCC and FINWATCH</p> <p><b>Training attended:</b> He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, endorsed RSPO P&amp;C Lead Auditor Course in October 2019 and endorsed MSPO Lead Auditor Course in November 2019</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of Occupational, Health &amp; Safety and estate best practises</p> <p><b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English Language.</p>

**Accompanying Persons:**

Name	Role
Nicholas Cheong (NC)	RSPO Labor Auditing Guidelines Pilot Audit activities.
Ahmad Amirul (RSPO Secretariat) (AA)	RSPO Labor Auditing Guidelines Pilot Audit activities.

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**1.3 Assessment Plan**

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

Date	Time	Subjects	(MNM)	(HNS)	(VKP)	(NC)/(AA)	
Sunday, 21/11/2021		Travel from KL to Kluang and check in Hotel.	√	√	√	√	
Monday, 22/11/2021  <b>Bukit Tongkat B Estate</b>	0730 - 0830	Travel from Kluang to Ulu Belitong Estate	√	√	√	√	
	0830 - 0930	Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit Team Leader (including RSPO Labor Auditing Guidelines Pilot Audit)</li> <li>• Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).</li> </ul>	√	√	√	√	
	0930 - 1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.  Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√	√	
	1230 - 1330	Lunch	√	√	√	√	
	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.)	√	√	√	
			RSPO Labor Auditing Guidelines Pilot Audit activities.				√
	1630 - 1700		Interim Closing Briefing	√	√	√	√

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Date	Time	Subjects	(MNM)	(HNS)	(VKP)	(NC)/(AA)
Tuesday, 23/11/2021 <b>Ulu Belitong Estate</b>	9.00 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.  Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√	
		RSPO Labor Auditing Guidelines Pilot Audit activities.				√
	1230 - 1330	Lunch	√	√	√	√
	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.)	√	√	√	
		RSPO Labor Auditing Guidelines Pilot Audit activities.				√
	1630 - 1700	Interim Closing Briefing	√	√	√	√
Wednesday 24/11/2021 <b>Belitong POM</b>	9.00 – 12.30	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.	√	√	√	
		RSPO Labor Auditing Guidelines Pilot Audit activities.				√
	1230 - 1330	Lunch	√	√	√	√

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Date	Time	Subjects	(MNM)	(HNS)	(VKP)	(NC)/(AA)
	1330 - 1630	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 SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	√	√	√	
		RSPO Labor Auditing Guidelines Pilot Audit activities.				√
	1630 - 1700	Interim Closing Briefing	√	√	√	√
Thursday 25/11/2021 <b>Belitong POM</b>	0900 - 1000	Continue: 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 SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	√	√	√	√
		RSPO Labor Auditing Guidelines Pilot Audit activities.				√
	1000 - 1015	Verify any outstanding issues & Preparation for closing meeting	√	√	√	√
	1015 - 1030	Closing meeting	√	√	√	√
		Travel from site to KL	√	√	√	√

**NCR Closure Audit Plan**

Date	Time	Subjects	MN
Thursday, 10/2/2022		Travel from KL to Kluang and check in Hotel.	√
Friday, 11/2/2022	0800-0900	Travelling from Hotel to Ulu Belitong Estate	√

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Date	Time	Subjects	MN
	0900-0930	Ulu Belitong Estate: Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize Audit plan (including stakeholder's/workers consultation).</li> </ul>	√
	0930-1130	Ulu Belitong estate: Verification on previous Major NC. Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence	√
	1130-1230	Closing	√
	1230-1700	Travelling back to Kuala Lumpur	√



### Section 3: Assessment Findings

#### 3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	The plan is inclusive of all current subsidiaries, estates and mills as per time bound plan FY2021. As stated, the management of FGV Holdings Berhad has plan to certify all the complexes starting from 2017 until 2021. The updated time bound plan dated April 2021 shows that the plan spans from year 2017 until 2023.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	33 complexes have been certified from 2017 – 2019 as shown in the TBP below. Remaining 35 mills have undergone internal audit.  The time bound plan is behind the scheduled due to tendering process which CB appointment based on yearly selection together with re-suspension by RSPO Complaint Panel for certification processes for all FGV’s uncertified units for unsatisfactory findings on non-compliance of the Complaints Panel Decision dated 28/11/2018. ( <a href="https://www.rspo.org/news-and-events/news/rspo-statement-regarding-complaints-panel-decision-on-felda-global-venture-holdings">https://www.rspo.org/news-and-events/news/rspo-statement-regarding-complaints-panel-decision-on-felda-global-venture-holdings</a> )  On the latest development of suspension, verification audit by RSPO CP being conducted by an independent certification body (CB) appointed by RSPO to assess and verify the implementation of the action plan at 6 FGV units (unit names are confidential). The exercise being carried out since November 2020. The current status is waiting final report from CP as RSPO has informed FGV Holdings Berhad after meeting conducted on 06/12/2021.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	No new acquisitions were recorded or in planning.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	There is a slight delay on certification for the remaining uncertified units due to RSPO Complaint Panel suspension – uplifting decision still pending at RSPO CP side. Refer RSPO letter dated 13 January 2020.  Other than that, another possible revision of the TBP involving:  1. Issues pertaining membership as of now FGV management control has been taken over by FELDA through shareholder acquisition.	Complied

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	2. Mills and estates rationalization exercises effective June 2021.	
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?	Slight changes to the time-bound plan since the last audit i.e. stretched to 2023 due to RSPO complaint panel on suspension of FGV. However, FGVPI KS Jerangau Baru have ceased operation effective 01/01/2021 and has been removed from the time bound plan. There are also rationalization plans for FGVPM estates which to be concluded in June 2021. Notification to Scheme Owner as well as to Certification bodies in progress.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	There are no lapses in implementation of the plan.	Complied
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 <b>Major</b> non-compliance shall be raised	There are no fundamental failure in implementation of the plan.	Complied
<b>Un-Certified Units or Holdings</b>		
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.	There has been no replacement of primary forest area. There were 4 LUCA submitted to RSPO and 2 LUCA review was completed. However, there is one issue reported by Chain Research Reaction regarding HCV clearance in Kalimantan. FGV has briefed the issue to RSPO Secretariat.	Complied
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	There is new planting after 1st January 2010. Liability Disclosure was submitted and waiting for RSPO's decision for further action. The Liability Disclosure involved Asian Plantation Limited and Tanah Emas Oil Palm Processing. FGVPM Tenggara 12 and FGVPM Rantau Abang 02 for new planting with NPP.	Complied
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.	No land conflict. There were 4 LUCA submitted to RSPO and 2 LUCA review was completed and 3 concept note required as per the RSPO RaCP tracker.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	In reference to RSPO Complaints Panel directive findings dated 30/11/2018 and second letter on 13/01/2020 resulting from the verification audit which was carried out in October 2019 as well as several other internal assessment and external audits findings on recruitment issues particularly on recruitment costs, FGV has taken positive and further steps to ensure that the workers are well informed of FGV policies on the hiring of workers inter alia the cost of recruitment.	Complied

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	<p>In addition, since July 2019, FGV has been conducting briefing sessions for its appointed recruitment agencies to communicate and promote understanding about the contents and expectations of the Guidelines and Procedures for the Responsible Recruitment of Foreign Workers. Emphasis is given in particular on ethical recruitment processes and on the non-imposition of recruitment fees by the recruitment agencies on the workers as stipulated in the contract between FGV and the recruitment agencies.</p> <p>Notwithstanding, it is noted that the pre-recruitment costs which include the cost of securing the official documents (ID and passports) and the travel-related cost for these are borne by workers, which some paid to the sub-agent/ agents to assist/ expedite the process.</p> <p>FGV has also revised the contract of Recruitment Agencies Contract to translate FGV's commitment to bear the official costs of recruitments which include, among others, the levy, airfare, cost of medical check-up in Malaysia and insurance. The revised contract includes new provisions prohibiting the agencies from charging the above fees on workers.</p> <p>In order to ensure recruitment agencies, comply with this requirement around imposition of fee, FGV has conducted a series of socialization programs with agencies and their sub-agents in Lombok (Indonesia) on 30-31/01/2020, Chennai (13/01/2020) and Kolkata (14/01/2020). During this process, FGV explained that the costs associated with the recruitment onwards are covered by FGV and on that basis agents and sub-agents shall not charge workers on similar fee.</p> <p>FGV has also established three One-Stop-Center in sourcing country of workers namely Lombok (Indonesia); Chennai (India) and Kolkata (India) where workers go through pre-departure training programme (which is conducted in collaboration with local labour department); interview and selection process. FGV is continuously conducting a socialization programme comprising a serious of engagement sessions involving various stakeholders. Given the size of FGV's operations and the large number of its mills and plantations, the socialization programme has being carried out in phases in different locations starting June 2019.</p> <p>These action plans being developed and implemented through out FGV units to mitigate the issues highlighted in the complaints particularly to labour related issues, and its progress report being</p>	
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	<p>reporting quarterly to RSPO Secretariat and can be referred on FGV Sustainability website: <a href="https://www.fgvholdings.com/sustainability/reports-updates/">https://www.fgvholdings.com/sustainability/reports-updates/</a>.</p> <p>Further to the action plans, RSPO CP has also carried out verification audits through its appointed Certification Bodies to assess the implementation and the effectiveness of the action plans. On the latest development of the verification audit by RSPO COP, another round of assessment being conducted by an independent certification bodies (CB) appointed by RSPO to assess and verify the implementation of the action plan at six FGV units. The exercise being carried out since November 2020. The current status is waiting final report from CP as RSPO has informed FGV Holdings Berhad after meeting conducted on 06/12/2021.</p>	
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>Reviewed the Borang Tuntutan Bayaran Kerja dan Kerja Lebih Masa (Bekerja Pada Hari Biasa, Cuti Rehat dan Hari Cuti Kelepasan Am) of the female worker (Employee No.: 1211630) found that she worked after 10pm without the approval from JTK as per Employment Act 1955, Section 34 (1). The detail of the overtime worked as below:</p> <p>Date Time 17/03/2020 5.15pm – 1.15am 14/10/2020 4.15pm – 10.15pm 20/11/2020 6.00pm – 11.35pm</p> <p>Reviewed the punch card and <i>Borang Tuntutan Bayaran Kerja dan Kerja Lebih Masa (Bekerja Pada Hari Biasa, Cuti Rehat dan Hari Cuti Kelepasan Am)</i> for February 2021, August 2021 and October 2021 found that the female worker did not work after 10pm. The application to JTK still in progress where correspondence was sighted.</p> <p>The implementation of corrective action was effective and the major non-conformance remained closed</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Yes, there have positive assurance statement from internal certification unit. All 67 complexes have conducted internal audit in Year 2019 and 2020. Seen the internal audit done by Sustainability Compliance and Certification Department(SCCD).</p>	<p>Complied</p>

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<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>There are Critical (Major) non-compliance raised against any of the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the internal audits. These issues are addressed through internal audit action plan and implemented phased by phased (according to the timeline) by project. Evidence are available through internal audit reports.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Stakeholders are being engaged during stakeholders consultation which are being carried out during social impact assessment (SIA). Issues raised during the session are being recorded and actions/resolutions being handled by respective projects.</p>	<p>Complied</p>

**3.2 Progress of scheme smallholders and/or outgrowers**

<p><b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b></p>		
<p><b>Requirement</b></p>	<p><b>Remarks</b></p>	<p><b>Compliance</b></p>
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?  OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>FGVPISB Belitong POM received FFB from smallholder and independent outgrower. No scheme smallholder under FGVPISB Belitong POM.</p>	<p>Complied</p>

**Approved Time Bound Plan**

<b>TIME BOUND PLAN FORECAST FOR RSPO CERTIFICATION OF ALL FGV PALM OIL MILLS &amp; SUPPLY BASES</b>				
<b>Palm Oil Mill</b>	<b>Supply Bases (estates, plantations, associations)</b>			
	<b>FFB Supplier</b>	<b>Certification Year</b>	<b>Certification Standard</b>	<b>Status</b>
KS SELANCAR 2B	FGVPM Selancar 06	2017	MYNI 2019	Certified
	FGVPM Selancar 08	2017	MYNI 2019	
	FGVPM Selancar 09	2017	MYNI 2019	
KS ARING A	FGVPM Aring 02	2017	MYNI 2019	Certified
	FGVPM Aring 15	2017	MYNI 2019	
	FGVPM Aring 03	2017	MYNI 2019	
	FGVPM Aring 04	2017	MYNI 2019	
	FGVPM Aring 05	2017	MYNI 2019	
	FGVPM Aring 06	2017	MYNI 2019	
	FGVPM Aring 08	2017	MYNI 2019	
	FGVPM Aring 10	2017	MYNI 2019	
KS SELENDANG	FGVPM Selendang 3	2018	MYNI 2019	Certified
	FGVPM Selendang 4	2018	MYNI 2019	
	FGVPM Selendang 5	2018	MYNI 2019	
	FGVPM Berabong 1	2018	MYNI 2019	
KS BUKIT SAGU	FGVPM Bukit Sagu 04	2017	MYNI 2019	Certified
	FGVPM Bukit Sagu 6	2017	MYNI 2019	
	FGVPM Bukit Sagu 07	2017	MYNI 2019	
	FGVPM Bukit Sagu 08	2017	MYNI 2019	
KS KERATONG 9	FGVPM Bera Selatan 05	2017	MYNI 2019	Certified
	FGVPM Bera Selatan 07	2017	MYNI 2019	

	FGVPM Merchong	2017	MYNI 2019	
	FGVPM Keratong Timur	2017	MYNI 2019	
	FGVPM Merchong	2017	MYNI 2019	
KS LEPAR UTARA 6	FGVPM Lepar Utara 07	2017	MYNI 2019	Certified
	FGVPM Lepar Utara 08	2017	MYNI 2019	
	FGVPM Lepar Utara 09	2017	MYNI 2019	
	FGVPM Lepar Utara 11	2017	MYNI 2019	
KS MOAKIL	FGVPM Moakil 06	2018	MYNI 2019	Certified
	FGVPM Moakil 07	2018	MYNI 2019	
KS KEMASUL	FGVPM Mengkarak 1	2018	MYNI 2019	Certified
	FGVPM Mengkarak 2	2018	MYNI 2019	
KS KRAU	FVGPM Krau 2	2018	MYNI 2019	Certified
	FVGPM Krau 4	2018	MYNI 2019	
KS LEPAR HILIR	FGVPM Lepar Hilir 05	2017	MYNI 2019	Certified
	FGVPM Lepar Hilir 06	2017	MYNI 2019	
	FGVPM Lepar Hilir 08	2017	MYNI 2019	
KS TRIANG	FGVPM Triang 2	2017	MYNI 2019	Certified
	FGVPM Triang Selatan 1	2017	MYNI 2019	
	FGVPM Triang 4	2017	MYNI 2019	
KS KECHAU B	FGVPM Kechau 06	2017	MYNI 2019	Certified
	FGVPM Kechau 08	2017	MYNI 2019	
	FGVPM Kechau 09	2017	MYNI 2019	
	FGVPM Kechau 10	2017	MYNI 2019	
	FGVPM Kechau 02	2017	MYNI 2019	
	FGVPM Kechau 03	2017	MYNI 2019	
	FGVPM Kechau 07	2017	MYNI 2019	
	FGVPM Kechau 11	2017	MYNI 2019	
FGVPM Chegar Perah 2	2017	MYNI 2019		

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	FGVPM Telang 01	2017	MYNI 2019	
	FGVPM Telang	2017	MYNI 2019	
KS PALONG TIMUR	FGVPM Palong Timur 4/5	2018	MYNI 2019	Certified
	FGVPM Palong Timur 06	2018	MYNI 2019	
KS BESOUT	FGVPM Besout 06	2018	MYNI 2019	Certified
	FGVPM Besout 07	2018	MYNI 2019	
KS NERAM	FGVPM Cherul 03	2018	MYNI 2019	Certified
KS CHINI 3	FGVPM Terapai 1	2018	MYNI 2019	Certified
	FGVPM Chini Timur 4	2018	MYNI 2019	
KS CHIKU	FGVPM Ciku 4	2018	MYNI 2019	Certified
	FGVPM Ciku 8	2018	MYNI 2019	
KS KERATONG 2	FGVP Bera Selatan 03	2018	MYNI 2019	Certified
KS SERTING	FGVPM Palong 17	2018	MYNI 2019	Certified
	FGVPM Palong 18	2018	MYNI 2019	
	FGVPM Palong 21	2018	MYNI 2019	
	FGVPM Serting Hilir 8	2018	MYNI 2019	
KS KERATONG 3	FGVPM Keratong 11	2018	MYNI 2019	Certified
KS KERTEH	FGVPM Kerteh	2018	MYNI 2019	Certified
	FGVPM Semaring 01	2018	MYNI 2019	
KS KOTA GELANGGI	FGVPM PPTR	2018	MYNI 2019	Certified
	FGVPM K.GELANGGI 5/6	2018	MYNI 2019	
KS JENGA 21	FGVPM Jengka 24/25	2018	MYNI 2019	Certified
KS PENGGELI	FGVPM Inas Selatan	2018	MYNI 2019	Certified
KS BELITONG	FGVPM Ulu Belitong	2018	MYNI 2019	Certified
	FGVPM Bukit Tongkat B	2018	MYNI 2019	
KS KULAI	FGVPM Bkt Besar/Taib Andak	2018	MYNI 2019	Certified
KS ADELA	FGVPM Kledang 2	2018	MYNI 2019	Certified
KS SERTING HILIR	FGVPM Tembangau 03	2018	MYNI 2019	Certified



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	FGVPM Tembangau 05	2018	MYNI 2019	
	FGVPM Tembangau 06	2018	MYNI 2019	
	FGVPM Tembangau 07	2018	MYNI 2019	
	FGVPM Tembangau 08	2018	MYNI 2019	
	FGVPM Tembangau 09	2018	MYNI 2019	
	FGVPM Serting Hilir 9	2018	MYNI 2019	
	FGVPM Serting Hilir	2018	MYNI 2019	
KS BUKIT KEPAYANG	FGVPM Terapai 3	2018	MYNI 2019	Certified
KS JERANGAU BARU	FGVPM Rantau abang 1	2018	MYNI 2019	Officially closed on 31/12/2020
	FGVPM Rantau abang 2	2021	MYNI 2019	
	FGVPM Chador 1	2018	MYNI 2019	
KS TENGGAROH	FGVPM Tenggaroh 9	2018	MYNI 2019	Certified
	FGVPM Tenggaroh 11	2018	MYNI 2019	
	FGVPM Tenggaroh 13	2018	MYNI 2019	
KS NITAR	FGVPM Nitar Timur	2018	MYNI 2019	Certified
KS CHALOK	FGVPM Setiu 1	2018	MYNI 2019	Certified
KS WA HA	FGVPM BUKIT APING SELATAN	2018	MYNI 2019	Certified
KS KALABAKAN	FGVPM Kalabakan Utara 01	TBC	TBC	Targeted to be certified on Year 2022
	FGVPM Kalabakan Selatan	TBC	TBC	
KS HAMPARAN BADAI	FGVPM Sahabat 23	TBC	TBC	Targeted to be certified on Year 2022
	FGVPM Sahabat 24	TBC	TBC	
	FGVPM Sahabat 26	TBC	TBC	
	FGVPM Sahabat 28	TBC	TBC	
	FGVPM Sahabat 31	TBC	TBC	
	FGVPM Sahabat 33	TBC	TBC	
	FGVPM Sahabat 34	TBC	TBC	
	FGVPM Sahabat 25	TBC	TBC	
FGVPM Sahabat 22	TBC	TBC		

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	FGVPM Tambisan	TBC	TBC	
KS UMAS	FGVPM Umas 05	TBC	TBC	Targeted to be certified on Year 2022
	FGVPM Umas 06	TBC	TBC	
KS PONTIAN FICO	Pontian Fico	TBC	TBC	Targeted to be certified on Year 2022
	Pontian Subok	TBC	TBC	
	Pontian Orico	TBC	TBC	
	Pontian Pendirosa	TBC	TBC	
	Pontian Kuril	TBC	TBC	
	Pontian Hillco	TBC	TBC	
	Pontian Korosah	TBC	TBC	
	Blossom Plantation Sdn. Bhd	TBC	TBC	
KS TEMENTI	FGVPM Bera Selatan 1	TBC	TBC	Targeted to be certified on Year 2022
	FGVPM Bera Selatan 4	TBC	TBC	
KS SELANCAR 2A	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS BUKIT MENDI	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS JENGA 8	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS JENGA 18	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS JENGA 3	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS PADANG PIOL	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS TERSANG	External Suppliers	TBC	TBC	Targeted to be certified on Year 2022
KS KEMAHANG	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023

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KS CHINI 2	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS JERANGAU BARAT	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS TROLAK	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS SEMENCHU	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS PANCHING	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS AIR TAWAR	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS LOK HENG	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS SG TENGI	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS PASOH	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS KAHANG	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS MEMPAGA	External Suppliers	TBC	TBC	Targeted to be certified on Year 2023
KS SAMPADI	FGVPM Sampadi 01	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sampadi 03	TBC	TBC	
	FGVPM Sampadi 04	TBC	TBC	
	FGVPM Sampadi 05	TBC	TBC	
	FGVPM Sampadi 06	TBC	TBC	
KS KEMBARA SAKTI	FGVPM Sahabat 30	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sahabat 35	TBC	TBC	
	FGVPM Sahabat 40	TBC	TBC	

	FGVPM Sahabat 41	TBC	TBC	
	FGVPM Sahabat 42	TBC	TBC	
	FGVPM Sahabat 43	TBC	TBC	
KS NILAM PERMATA	FGVPM Sahabat 50	TBC	TBC	Internal Audit
	FGVPM Sahabat 51	TBC	TBC	
	FGVPM Sahabat 52	TBC	TBC	
	FGVPM Sahabat 53	TBC	TBC	
	FGVPM Sahabat 54	TBC	TBC	
KS MERCU PUSPITA	FGVPM Sahabat 07	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sahabat 46	TBC	TBC	
	FGVPM Sahabat 48	TBC	TBC	
	FGVPM Sahabat 10	TBC	TBC	
	FGVPM Sahabat 06	TBC	TBC	
KS LANCANG KEMUDI	FGVPM Sahabat 36	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sahabat 38	TBC	TBC	
	FGVPM Sahabat 39	TBC	TBC	
	FGVPM Sahabat 44	TBC	TBC	
	FGVPM Sahabat 45	TBC	TBC	
KS EMBARA BUDI	FGVPM Sahabat 11	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sahabat 12	TBC	TBC	
	FGVPM Sahabat 17	TBC	TBC	
	FGVPM Sahabat 56	TBC	TBC	
	FGVPM Sahabat 20	TBC	TBC	
	FGVPM Sahabat 17	TBC	TBC	
	FGVPM Sahabat 21	TBC	TBC	
KS BAIDURI AYU	FGVPM Sahabat 09	TBC	TBC	Targeted to be certified on Year 2023
	FGVPM Sahabat 16	TBC	TBC	
	FGVPM Sahabat 55	TBC	TBC	

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KS TENGGAROH TIMUR	FGVPM Tenggaraoh 12	2021	TBC	Targeted to be certified on Year 2023
	FGVPM Tenggaraoh Timur 2	TBC	TBC	
Asian Plantation Milling Sdn. Bhd	Incoseitia Sdn. Bhd	TBC	Group Cert	Internal Audit
	Kronos plantations Sdn. Bhd	TBC	Group Cert	
	Fortune Plantation Sdn. Bhd	TBC	Group Cert	
	BJ Corporation Sdn. Bhd	TBC	Group Cert	
Tanah Emas Oil Palm Processing	Sri Kehuma	TBC	Group Cert	Internal Audit
	Yapidmas AE	TBC	Group Cert	
	Tanah Emas Corporation Berhad (TECB)	TBC	Group Cert	
	Ladang Kluang	TBC	Group Cert	
	Yapidmas D	TBC	Group Cert	
	Sri Mosta 1	TBC	Group Cert	
	Sri Mosta 2	TBC	Group Cert	
	Sri Mosta 3	TBC	Group Cert	
	Cepat Ringgit A	TBC	Group Cert	
	Cepat Ringgit B	TBC	Group Cert	
	Cepat Ringgit D	TBC	Group Cert	
	Karamuak	TBC	Group Cert	
	Sg Milian	TBC	Group Cert	
	Sg Imbak	TBC	Group Cert	
Kuamut	TBC	Group Cert		
PT CITRA NIAGA PERKASA	TBA	TBC	INA-NIWG	Internal Audit
PT TEMILIA AGRO ABADI	TBA	TBC	INA-NIWG	Internal Audit
FGV estate without mills	FGVPM Paloh	2018	MYNI 2019	Certified under Kulim (M) Berhad – Tereh POM
Estate under RaCP	TBA	TBC	MYNI 2018	Internal Audit

**3.3 Details of Nonconformities**

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

During this Assessment there were *two* (2) Critical; *two* (2) Minor nonconformities and *no* Opportunity For Improvement raised. The *FGV Belitong* 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.

<b>Non-conformity</b>			
<b>NCR Ref #</b>	2136260-202111-M1	<b>Date Issued</b>	25/11/2021
<b>Due Date</b>	22/2/2022	<b>Date of nonconformity Closure</b>	11/2/2022
<b>Clause &amp; Category (Critical / Minor)</b>	2.2.2 Major (Critical)		
<b>Statement of Nonconformity:</b>	Due diligence of contractor was not available.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	Reviewed the payslips of the contractor’s workers (Zaidan Joyoo Enterprise - I/C: 890117-01-57XX and 880822-01-54XX) in Bukit Tongkat B Estate on August 2021 and October 2021 found that the workers did not pay for the public holiday wages. Besides, the workers did not entitle for paid annual leave as per agreed in the employment contract. This has confirmed through interview with the contractor.  The minor non-conformance was escalated to major non-conformance due to recurrence of the same indicator during ASA2.		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1) To appointed New person in charge to handle compliance for Employment Contracts among contractors.</li> <li>2) Management to ensure all workers in comply with employment act through monthly payroll review for each employee thru meeting with contractors every 6 months.</li> </ol>		
<b>Root Cause Analysis:</b>	No enforcement and no training conducted by management in monitoring regarding compliance for Employment Contracts among contractors due to changes person in charge to monitor the issues.		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1) Evidences on training for New person in charge to handle compliance for Employment Contracts among contractors.</li> <li>2) Minute of meeting with Contractors every 6 months to discuss matter related to Employment Contracts</li> </ol>		
<b>Assessment Conclusion:</b>	Verification on evidence as per below:-		

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	<p>Appointment letter (01)601/BKT TONGKAT B dated 1/1/2022 to en Hasbi Bin Mamat to ensure monitoring for contractor document and implementation.</p> <p>From the verification on payslip on Dec 2021 and Jan 2021, already paid for the public holiday wages and the previous annual leave already paid by the Zaidan Joyoo Enterprise to - I/C: 890117-01-57XX and 880822-01-54XX. This also verified as per interview with the workers.</p> <p>The training been conducted to En Hasbi on 4/1/2022, this training conducted by Manager Bukit Tongkat B estate. This training been attended by other staff with total 10 person.</p> <p>Minute meeting with contractor (Masaki Enterprise and Zaidon Joyoo Enterprise) as per referred (1)/2022/RSPO&amp; MSPO dated 4/1/2022.</p> <p>Thus, Major NC was close on 11/2/2022.</p>
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Non-conformity			
<b>NCR Ref #</b>	2136260-202111-M2	<b>Date Issued</b>	25/11/2021
<b>Due Date</b>	22/2/2022	<b>Date of nonconformity Closure</b>	11/2/2022
<b>Clause &amp; Category (Critical / Minor)</b>	3.6.1 Major (Critical)		
<b>Statement of Nonconformity:</b>	The hazard was not comprehensively identified for the mill operations in the HIRADC.		
<b>Requirement Reference:</b>	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
<b>Objective Evidence:</b>	<p>HIRADC was available to assess all risks and hazards in the mill operations. Nevertheless, the HIRADC did not identify hazards as verified below.</p> <ul style="list-style-type: none"> <li>• Based on the accident records in the mill there were 2 accidents related to bodily injury while working at the Kernel Station (Rolek) for the past 2 years. Verification done on the HIRADC for Kernel Station dated 01/11/2021 indicated that the hazard was has not identified.</li> <li>• Based on the visit to the Mill Ramp, it was noticed that the ramp attendants were using Stihl Blower at the station. The Ramp Station HIRADC did not capture the possible hazards from this operation.</li> <li>• Visit to the Mill Ramp, it was identified that the Showel did not have reverse siren. The HIRARC did not capture the possible hazards that could lead from the Showel Reversing without siren.</li> </ul>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1) Evidence on instalment handrail.</li> <li>2) Prepare HIRADC at accident area at Kernel Station, ramp station &amp; Mill ramp</li> </ol>		
<b>Root Cause Analysis:</b>	No capturing and identification from mill management on accident at Kernel Station, ramp station & Mill ramp in HIRADC due to person in charge who preparing the HIRADC documentation is new and no training yet.		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1) To conduct HIRADC training for new person in charge.</li> <li>2) To discuss in OSHA meeting training need analysis related to OSHA and implementation of OSHA training Plan</li> </ol>		

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<b>Assessment Conclusion:</b>	<p>Verification on evidence as per below:- HIRARC already been reviewed dated 19/12/2021 for area below:-</p> <ul style="list-style-type: none"> <li>a) Kernel Plant</li> <li>b) Mill Ramp</li> <li>c) Prime Mover (Showel)</li> </ul> <p>HIRARC training conducted by Mohd Sharizan (Region SHO) to mill on 9/12/2021 attended by 10 people.</p> <p>Appointment letter for En Mohamad Qayyum Akmal Bin Jeffri dated 19/12/2021 referred letter (85)840A/BLTG/2</p> <p>Minute meeting dated 19/12/2021 on HIRARC reviewed been conducted this already included the issue in kernel station, ramp station and mill ramp. Thus, Major NC was close on 11/2/2022</p>
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Non-conformity			
<b>NCR Ref #</b>	2136260-202111-N1	<b>Date Issued</b>	25/11/2021
<b>Due Date</b>	Next Surveillance Audit	<b>Date of nonconformity Closure</b>	"Open"
<b>Clause &amp; Category (Critical / Minor)</b>	4.2.2 Minor		
<b>Statement of Nonconformity:</b>	Procedure of handling complaint and grievance was not implemented effectively.		
<b>Requirement Reference:</b>	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.		
<b>Objective Evidence:</b>	Interviewed with the workers at the housing area in Bukit Tongkat B Estate told that they have requested for curtains due to direct sunlight to the room about one month ago but no action has been taken. Reviewed the Complaint and Request Logbook found that the complaint was recorded on 13/10/2021. The issue has yet to be resolved as per the SOP for "Menangani Aduan dan Rugutan" with Doc. No.: FGV/ML-1A/L2-Pr13 dated 01/04/2019 where it shall be resolved within 14 days.		
<b>Corrections:</b>	To review and close the requested issue regarding to curtains and solve on Dec 2021.		
<b>Root Cause Analysis:</b>	Management were not monitor grievance received from workers due to New person in charge not aware on SOP for "Menangani Aduan dan Rungutan".		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>1) To give training of SOP for "Menangani Aduan dan Rungutan to new person in charge.</li> <li>2) Minute of meeting on discussing implementation on SOP for "Menangani Aduan dan Rungutan".</li> </ul>		
<b>Assessment Conclusion:</b>	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			
<b>NCR Ref #</b>	2136260-202111-N2	<b>Date Issued</b>	25/11/2021
<b>Due Date</b>	Next Surveillance Audit	<b>Date of nonconformity Closure</b>	"Open"
<b>Clause &amp; Category (Critical / Minor)</b>	7.3.1 Minor		
<b>Statement of Nonconformity:</b>	Found the waste management plan to be inadequately documented and implemented		
<b>Requirement Reference:</b>	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance		
<b>Objective Evidence:</b>	Sighted waste such as Spent N-Hexane in lab was not identified as scheduled waste in waste management plan dated Jan 2021. No record of Spent N-hexane in scheduled waste inventory as per verification. During interview with lab operator, they stated that the Spent N-Hexane has been collected and disposed at the effluent pond.		
<b>Corrections:</b>	1) Management to prepare documentation on Inventory & Identification n-hexane as schedule waste in waste management plan. 2) To prepare labelling and SW store to manage SW 322. 3) To appoint DOE Licensed Contractor to collect SW 322		
<b>Root Cause Analysis:</b>	No awareness on SW322 Non-halogenated organic solvent to new person in-charged due to new revised manual on Chemical Handling procedure.		
<b>Corrective Actions:</b>	1) Continuous training to New PIC regarding SW management annually based on training need analysis. 2) Management to discuss SW management in Environment meeting annually.		
<b>Assessment Conclusion:</b>	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	Nil

Positive Findings	
PF #	Description
PF 1	Good commitment and corporation from the management.
PF 2	Positive feedbacks from internal and external stakeholders.

**3.3.1 Status of Nonconformities Previously Identified and Observations**

Non-conformity			
<b>NCR Ref #</b>	2002375-202012-M1	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	2.1.1 (Critical)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	24/2/2020
<b>Statement of Nonconformity:</b>	Compliance of legal requirements was not demonstrated effectively		
<b>Requirement Reference:</b>	The Unit of Certification complies with legal requirements.		
<b>Objective Evidence:</b>	FGVPI SB Belitong POM: Reviewed the Borang Tuntutan Bayaran Kerja dan Kerja Lebih Masa (Bekerja Pada Hari Biasa, Cuti Rehat dan Hari Cuti Kelepasan Am) of the female worker (Employee No.: 1211630) found that she worked after 10pm without the approval from JTK as per Employment Act 1955, Section 34 (1). The detail of the overtime worked as below: Date Time 17/03/2020 5.15pm – 1.15am 14/10/2020 4.15pm – 10.15pm 20/11/2020 6.00pm – 11.35pm		
<b>Corrections:</b>	Mill to apply the JTK permit for female work on nightshift.		
<b>Root Cause Analysis:</b>	No monitoring and enforcement from Management & person in charge on compliance with the legal issues.		
<b>Corrective Actions:</b>	1. Letter of Instruction from management to the Assistant Manager and officers appointed for review & legal changes to ensure that every legal requirement in the legal register is reviewed and fully enforced by periodically every 6 months. 2. The management should conduct training and provide information on the duties / responsibilities on compliance and legal register.		
<b>Assessment Conclusion:</b>	Major NC remote verification: 1. The mill has applied to JTK for the permit for 'Nightwork Restriction Exemption for Female Workers. The application was available for verification dated 02 <sup>nd</sup> February 2021 awaiting approval. 2. The mill has appointed Mohd. Shahariezal Bin Zainudin as the officer for monitoring legal compliances and changes in laws on 3rd February 2021 as stated in the appointment letter undersigned by the Mill Manager. 3. The mill has appointed Ms. Suzinorliani Bt Samsudin as the Monitoring Officer to Female Workers at Night as stated in the appointment letter dated 03 <sup>rd</sup> December 2020 undersigned by the Mill Manager. 4. A training was conducted on the legal requirements for female workers to work during the night on 03rd December 2020 attended by 5 participants.		

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	The evidence provided was deemed to be sufficient therefore the Major Nonconformity was closed.
<b>ASA 3 Verification</b>	Reviewed the punch card and <i>Borang Tuntutan Bayaran Kerja dan Kerja Lebih Masa (Bekerja Pada Hari Biasa, Cuti Rehat dan Hari Cuti Kelepasan Am)</i> for February 2021, August 2021 and October 2021 found that the female worker did not work after 10pm. The application to JTK still in progress where correspondence was sighted.  The implementation of corrective action was effective and the major non-conformance remained closed.

Non-conformity			
<b>NCR Ref #</b>	2002375-202012-M2	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	6.2.2 (Critical)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	24/2/2020
<b>Statement of Nonconformity:</b>	Payment and condition of employment contract was not implemented effectively.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	Bukit Tongkat B Estate: The management will be subsidized RM 4 for water bill and RM 6 for electricity every month to all the workers as per the employment contract. However, sampled the payslips for July 2020 found that some of the workers did not receive the subsidize for electricity. The sampled workers as below: 1. Employee No.: FW06010155 2. Employee No.: FW06010157 3. Employee No.: FW06010158 4. Employee No.: FW06010134		
<b>Corrections:</b>	Management to ensure all workers received subsidized RM 4 for water bill and RM 6 for electricity every month as per the employment contract by developing the checklist.		
<b>Root Cause Analysis:</b>	No monitoring and enforcement from management regarding the implementation of payment and condition of employment contract		
<b>Corrective Actions:</b>	1. Appoint person in charge to ensure all workers received subsidized RM 4 for water bill and RM 6 for electricity every month to all the workers as per the employment contract. 2. The person in charge needs to ensure that employment contract is complied with for each worker.		

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	3. Letter for Instruction from the management, so that all officers make a review when the salary slip has been printed so that the error can be corrected immediately
<b>Assessment Conclusion:</b>	<p>Major NC remote verification:</p> <ol style="list-style-type: none"> <li>1. The sampled workers have been reimbursed with the entitled subsidies. The worker's payslips for the month of December 2020 was verified to include the reimbursed subsidies.</li> <li>2. The estate management has appointed Mr. Baktiar Bin Abdul Rahman as the Utility Officer in charge of monitoring the Water and Electricity bills in the estates as stated in the appointment letter dated 22nd December 2020 undersigned by the Estate Manager.</li> <li>3. A Subsidy Payment Checklist was implemented to monitor the allocation of subsidy for all workers. The checklist for December 2020 and January 2021 was available for verification.</li> <li>4. A Work Instruction (Doc Number: (01) 3601/JTK/12/2020) was implemented titled Review of Employee's Pay Slip by Estate Supervisor dated 20th December 2020. The work instruction states that all supervisors are accountable to ensure that the workers under their supervision are provided all entitled subsidies.</li> </ol> <p>The evidence provided was deemed to be sufficient therefore the Major Nonconformity was closed.</p>
<b>ASA 3 Verification</b>	<p>Seen the <i>Senarai Semak Penutupan Akaun Bulanan</i> from December 2020 to October 2021 found that the Assistant Manager has checked to ensure the minimum wage, daily incentive, subsidy of water and electricity and other matters are accurate. The Manager has verified it. Reviewed 10 payslips for February 2021, August 2021 and October 2021 found that the subsidy of water and electricity was paid accordingly.</p> <p>The implementation of corrective action was effective and the major non-conformance remained closed.</p>

Non-conformity			
<b>NCR Ref #</b>	2002375-202012-M3	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	3.6.2 (Critical)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	24/2/2020
<b>Statement of Nonconformity:</b>	Recommendations from the Medical Surveillance Assessment Report were not effectively implemented.		
<b>Requirement Reference:</b>	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
<b>Objective Evidence:</b>	FGVPI SB Belitong POM Based on the medical surveillance report dated January 2020, one worker was resulted to have anaemia and declared temporary unfit to work till further investigation was conducted. The management has not declared that the worker is temporary unfit, and the worker is identified to be still working in the workshop.		

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	There were no evidences available that the management have done further investigation or a medical retest for the mentioned worker.
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Management to conduct further investigation or a medical retest to one worker which resulted to have anemia and declared temporary unfit to work till further investigation was conducted as reported in the medical surveillance report.</li> <li>2. Management need to change the workplaces from operational section to administrative section.</li> </ol>
<b>Root Cause Analysis:</b>	Management did not proceed further investigation or a medical retest to one worker which resulted to have anemia and declared temporary unfit to work till further investigation was conducted as reported in the medical surveillance report due to no awareness about this matter to person in charge.
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. To conduct training to person in charge</li> <li>2. Based on result soon, management need to decide whether that worker can continue the work or not.</li> <li>3. Management to discuss this issue in the OSHA meeting.</li> </ol>
<b>Assessment Conclusion:</b>	<p>Major NC remote verification:</p> <ol style="list-style-type: none"> <li>1. The worker has been removed from the workshop station to General work as stated in the letter dated 26th December 2020 undesignated by the mill manager.</li> <li>2. An investigation was conducted by the management on the mentioned worker where a letter dated 16th December 2020 was given to Poliklinik Intan to pursue on the workers condition. The workers has been medically examined with the medical lab results available for verification. Poliklinik Intan has provided a report dated 22nd February 2021 based on the medical investigation conducted and mentioned that the workers was fit and healthy.</li> <li>3. A briefing was conducted on 26th December 2020 regarding the medical retest for the estate management and workshop personals.</li> <li>4. Verified the Workers Health &amp; Safety and Environment Meeting dated 16<sup>th</sup> December 2020 to include the discussion on this issue.</li> </ol> <p>The evidence provided was deemed to be sufficient therefore the Major Nonconformity was closed.</p>
<b>ASA 3 Verification</b>	Based on the ASA3 verification, it was identified that upon receiving reports such as medical surveillance and audiometric test, the management have reviewed the reports and taken necessary actions based upon the recommendations of the reports. All actions were verified to be accordance to the requirements. Therefore, the Major NC remains closed.

Non-conformity			
<b>NCR Ref #</b>	2002375-202012-M4	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	3.8.2 (Critical)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	24/2/2020

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<b>Statement of Nonconformity:</b>	FGVPISB Belitong POM has received some non-certified FFB and claimed the CPO and PK produced from it as RSPO certified products.
<b>Requirement Reference:</b>	Mass Balance Module 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.
<b>Objective Evidence:</b>	Based on the mass balance accounting extracted from the company's MPR (Monthly Performance Report), FGVPISB Belitong POM had received 75.16 mt of FFB from a non-certified area i.e. Ulu Belitong Peringkat 2 plantation between 7/2/2019 to 17/12/2020 as RSPO certified FFB. The CPO & PK produced from that amount of FFB had been classified and claimed as RSPO certified products by the mill.
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Mill to identify 75.16 mt FFB Peringkat-2 Ulu Belitong estate and downgrade as Noncertified FFB.</li> <li>2. To get declaration from Ulu Belitong estate regarding uncertified FFB from Peringkat-2</li> </ol>
<b>Root Cause Analysis:</b>	Management did not carry out specific monitoring on a monthly basis from the MPR data
<b>Corrective Actions:</b>	Management to ensure data from MPR is monitored monthly by Assistant Manager and stamped and verified as evidence of monitoring before it is filed.
<b>Assessment Conclusion:</b>	<p>Major NC remote verification:</p> <ol style="list-style-type: none"> <li>1. FGVASSB has notified the mill via a notification memo titled Notification of FFB status for FGVASSB Ulu Beitong Estate dated 17th December 2020. The memo states that FFB from Peringkat 1 and Peringkat 3 are RSPO Certified while FFB from Peringkat 2 is not FFB certified.</li> <li>2. The mill has appointed MR. Qayyum Akmal Bin Jefri as the officer to monitor the MPR data as stated in the appointment letter dated 03rd February 2021 undersigned by the mill manager.</li> <li>3. The mill has appointed Ms. Ain Nur Fatihah Bt Zuraimi as the Traceability Officer to monitor records on traceability of FFB received by the mill as stated in the appointment letter dated 03rd February 2021.</li> <li>4. The mill has identified 75.16 mt of RSPO Certified FFB for the month of February 2021 and downgraded the FFB as uncertified FFB. This was evident in the MPR data and Mass Balance Sheet provided for verification.</li> </ol> <p>The evidence provided was deemed to be sufficient therefore the Major Nonconformity was closed.</p>
<b>ASA 3 Verification</b>	<p>Belitong Palm Oil Mill receives and process both FFB supplied from Ulu Belitong and Bukit Tongkat B estates (own supply base) and other third parties. Since the last assessment, it did not receive any certified FFB from any third parties. Approximately, the FFB received from its own supply base is less than 10% from the total FFB received.</p> <p>The mill has incorporated in the weighbridge system to automatically separate FGVASSB Ulu Belitong Estate Peringkat 2 as it has been classified as non – certified FFB. Verified the monthly records of FFB by suppliers indicated that the FFB from</p>

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	FGVASSB Ulu Belitong Estate Peringkat 2 has been classified as non-certified therefore their major nonconformity remained closed.
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Non-conformity			
<b>NCR Ref #</b>	2002375-202012-M5	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	3.8.16 (Critical)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	24/2/2020
<b>Statement Nonconformity:</b>	The date of shipping announcement stated in the company's procedure is not inline with the standard requirement.		
<b>Requirement Reference:</b>	Registration of Transactions 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.		
<b>Objective Evidence:</b>	According to FGV's Supply Chain Procedure, dated 1/9/2019, under "Traceability" topic, the date of announcement shall be made maximum of 1 year after the shipping date. This is not in-line with the standard.		
<b>Corrections:</b>	Revised SCCS SOP (based on MYNI 2020) that shows the shipping announcement shall be made in-line with the new RSPO P&C Standard		
<b>Root Cause Analysis:</b>	SOP was based on RSPO SCC Standard 2017 which allowed announcements to be made as per own SOP. Revised SOP (based on MYNI 2019) is pending approval stage and will be used once approved.		
<b>Corrective Actions:</b>	The Sustainability Regulation Department in Group Sustainability Department FGV, has appointed a personnel to monitor any changes in legal requirements and changes from RSPO Standards.		
<b>Assessment Conclusion:</b>	<p>Major NC remote verification:</p> <ol style="list-style-type: none"> <li>The mill has appointed Mohd. Shahariezal Bin Zainudin as the officer for monitoring legal compliances, changes in laws and changes in RSPO requirements as stated in the appointment letter dated 3rd February 2021 undersigned by the Mill Manager.</li> <li>The revised SOP, Prosedur RSPO Supply Chain Certification (Kilang Sawit); Document No: FGV/GSD-SCCD/SOP/007; Dated: 07th January 2021; Version; 1.0; 6.0 Keterangan; 6.3 Pendaftaran Transaksi; 6.3.2 Pengumuman penghantaran product bersijil dilakukan oleh pihak logistik selwat-lewatnya 3 bulan setelah kontrak penghantaran lengkap dalam RSPO Palm Trace. (The announcement of certified products delivery is made by the Logistics Department no longer than 3 months after the complete delivery contract in our RSPO Palm Trace)</li> </ol> <p>The evidence provided was deemed to be sufficient therefore the Major Nonconformity was closed.</p>		
<b>ASA 3 Verification</b>	Contractors are only used by the RSPO Certified FFB Suppliers to transport RSPO Certified FFB from the estate to the mill. No other contractors are used to physically handle any RSPO certified oil palm products. Details of the contractors were		

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	<p>available in the mill which includes Contractor Name, Driver Name and Lorry Number.</p> <ul style="list-style-type: none"> <li>• Sale Order No.: SI/9G56/9GAE/1021/01</li> <li>• The name and address of the buyer: FGV Bulkers Pasir Gudang</li> <li>• The name and address of the seller: FGV Trading Sdn Bhd – Kilang Sawit Belitong, 86007 Kluang, Johor</li> <li>• The loading or shipment/ delivery date: 30/10/2021 announcement was on November 2021</li> <li>• The date on which the documents were issued: 30/10/2021</li> <li>• RSPO certificate number: RSPO 693230</li> <li>• A description of the product, including the applicable supply Chain model (Identity Preserved or Mass Balance or the approved abbreviations): CPO – RSPO SCC (Mass Balance)</li> <li>• The quantity of the products delivered: 37.02 MT</li> </ul> <p>The announcement of certified products delivery is made by the Logistics Department no longer than 3 months after the complete delivery contract in their RSPO Palm Trace. Thus the major NC remained closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	2002375-202012-N1	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	2.2.2 (Minor)
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	Upgrade to Major
<b>Statement of Nonconformity:</b>	Due diligence was not available.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	<p>FGVPISB Belitong POM (Hamid Engineering Enterprise)</p> <ol style="list-style-type: none"> <li>1. Worker (800921-01-64XX) working on public holiday (23/03/2020 and 08/06/2020) but yet to paid according to Employment Act 1955, Section 60D, Subsection 3(a)(i) as verified through the payslips and Punch Card.</li> </ol> <p>Bukit Tongkat B Estate (Zaidan Joyoo Enterprise and Masaki Enterprise)</p> <ol style="list-style-type: none"> <li>1. Both the contractors have yet to make the EPF and SOCSO contribution to the workers (880822-01-54XX, 890117-01-57XX, 870902-23-55XX and 880412-01- 50XX) as required by Employees Provident Fund Act 1991, Section 43 (1) and Employees Social Security Act 1969, Section 7 (1).</li> <li>2. Workers of Zaidan Joyoo Enterprise (880822-01-54XX and 890117-01-57XX) have found work on rest day (06/11/2020 and 13/11/2020) as verified in the</li> </ol>		



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	Daily Attendance Record for November 2020. However, reviewed the payslips found that they have not pay as per Employment Act 1955, Section 60(3)(d).
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Management to ensure all workers in comply with employment act especially pay the worker who work on public holiday through monthly payroll review for each employee.</li> <li>2. Awareness to contractor on EPF, SOCSO deduction as well as comply with employment act especially working on public holiday and rest day</li> </ol>
<b>Root Cause Analysis:</b>	Understanding and Compliance for Employment Contracts among contractors is unsatisfactory as it is not communicated effectively to the appointed contractors due to lack of meeting involvement or information provided between contractors and projects.
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Letter of Instruction to the contractor to send a copy of the salary slip or salary information of their employees every month for review by the estate and factory.</li> <li>2. Official instructions to the Assistant Manager to check and monitor the payment of contractor employees' salaries &amp; to conduct regular meetings with contractors that discuss matters relating to Employment Contract compliance.</li> </ol>
<b>Assessment Conclusion:</b>	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.
<b>ASA 3 Verification</b>	<p>A briefing on the employment and sustainability RSPO/ MSPO for contractors was conducted on 13/01/2021 and seen the record of attendance of the training where contractors in Bukit Tongkat B Estate and the workers of contractors were attended. Appointment letter dated 28/12/2020 to appoint the Assistant Manager as officer to monitor the documentation was sighted. The management has also issued letter of instruction to the contractor on 26/12/2020 to ensure the contractors take action to make the payment to workers. Seen the evidence of payslips on December 2020 found that the underpaid wages were paid. Besides, reviewed the payslips for February 2021, August 2021 and October 2021 found that the workers were paid accordingly. The Assistant Manager has carried out checking on the contractors for documents to be submitted by using <i>Senarai Semak Dokumen Pekerja Kontraktor</i>. Record of checking dated 18/02/2021 and 07/09/2021 was sighted. A monthly inspection from the managements to the contractor was carried out by using <i>Pemantauan Isu Penggajian Pekerja Kontraktor Tahun 2021</i>. Records from January 2021 to October 2021 was sighted.</p> <p>However, the minor non-conformance was escalated to major non-conformance due to recurrence of the same indicator during ASA2.</p>

Non-conformity			
<b>NCR Ref #</b>	2002375-202012-N2	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	3.4.2 (Minor)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	25/11/2021

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<b>Statement of Nonconformity:</b>	The social management plan has not completed comprehensively.
<b>Requirement Reference:</b>	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.
<b>Objective Evidence:</b>	Impact change of monitoring of the recruitment fee by the sub-agent in source of country was not identified in the management plan.
<b>Corrections:</b>	Conducting SIA assessment and conclude on recruitment fee by the sub-agent in source of country in SIA report.
<b>Root Cause Analysis:</b>	The revision of the existing SIA plan review could not be carried out by the estate management due to lack of skills in conducting a comprehensive social impact assessment and the latest SOP is still in the process of reviewing management approval.
<b>Corrective Actions:</b>	Responsible officers at the estate level can implement and identify new impact changes to provide a more complete management action mitigation plan.
<b>Assessment Conclusion:</b>	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.
<b>ASA 3 Verification</b>	<p>Both estates' management has appointed Workers Affair Clerk (Bukit Tongkat B Estate) and Executive (FGVASSB Ulu Belitong Estate) to be the communication and social officer to manage any matters related to SIA. Seen the appointment letter dated 02/01/2021 for Bukit Tongkat B Estate and 04/01/2021 for FGVASSB Ulu Belitong Estate.</p> <p>FGV has a plan to carry out social impact assessment on March 2022 for all operating units. Seen the SIA management plan FGVPB Bukit Tongkat B 2020/21 dated 28/10/2021 and 10/03/2021 for FGVASSB Ulu Belitong Estate where the impact of recruitment fee was included into the plan. JTK from Head Office will handle the recruitment agents by using the Communication Pack. Briefing of the recruitment fee to the workers was conducted on 19/05/2021 in FGVASSB Ulu Belitong Estate. Seen the record of briefing.</p> <p>The implementation of corrective action was found effective and the minor non-conformance was closed on 25/11/2021.</p>

Non-conformity			
<b>NCR Ref #</b>	2002375-202012-N3	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	7.3.2 (Minor)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	25/11/2021
<b>Statement of Nonconformity:</b>	The proper disposal of waste material was not satisfactorily demonstrated.		
<b>Requirement Reference:</b>	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		

<b>Objective Evidence:</b>	Ulu Belitong Estate has appointed a third party (Aeroline Sdn Bhd) to carry out repair/servicing of its machinery. The scheduled wastes generated such as used oil (SW305/306) and used filter (SW410) from the servicing activity were normally taken away by the third-party service provider. However, there is no evidence that the service provider has obtained any forms of authority to take away the scheduled wastes from the DOE.
<b>Corrections:</b>	The estate management to ensure that third party operating the services & schedule wastes, complies with the requirements of the DOE for the scheduled waste process generated from the estate. (have permit from DOE).
<b>Root Cause Analysis:</b>	No supervision by management on third party (Aeroline Sdn Bhd) on permit from DOE to carry out the scheduled wastes generated from the estate.
<b>Corrective Actions:</b>	Understanding and enforcement at the SHO & Procurement Dept to ensure Procurement procedures that have a mandatory list to follow before appointing any vendor to collect scheduled waste.
<b>Assessment Conclusion:</b>	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.
<b>ASA 3 Verification</b>	As per letter (BB)91/110/619/161 dated 9/8/2016 Ulu Belitong estate has permission from DOE to transport Scheduled waste and used Pusat Penyelidikan Pertanian Tun Razak (PPPTR) as centralized Scheduled waste store dated 29/7/2021. The estate already not used Aeroline Sdn Bhd.  For Belitong POM, verification been conducted as per interview with workers and documentation review. As per the disposal records, record of disposal was available, the consignment note 20210901171SDW2L dated 11/8/2021 for SW 409 with total 0.05mt. Another Consignment note verification for 2021090117FVWKID dated 11/8/2021 for SW 306 with total 0.412 mt. This disposal was carry out by Kualiti Alam Sdn Bhd. No issue sighted during verification on sampling. Thus Minor NC was close on 25/11/2021.

Opportunity for Improvement	
OFI#	Description
OFI 1	<p><b>OFI Statement:</b></p> <p><b>Verification / Follow-up actions:</b></p>

### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1638637-201804-M1	Major	2.1.1	08/06/2018	Closed out on 19/10/2018
1638637-201804-M2	Major	4.7.1	08/06/2018	Closed out on 19/10/2018

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1638637-201804-M3	Major	1.2.1	08/06/2018	Closed out on 19/10/2018
1638637-201804-M4	Major	6.5.2	08/06/2018	Closed out on 19/10/2018
1638637-201804-M5	Major	6.12.1	08/06/2018	Closed out on 19/10/2018
1638637-201804-M6	Major	SCCS E.5.1 c	09/06/2018	Closed out on 19/10/2018
1638637-201804-N1	Minor	4.1.3	08/06/2018	Closed out on 14/11/2019
1638637-201804-N2	Minor	4.7.5	08/06/2018	Upgraded to Major NC
1638637-201804-N3	Minor	6.5.3	08/06/2018	Upgraded to Major NC
1638637-201804-N4	Minor	6.12.2	08/06/2018	Closed out on 14/11/2019
1638637-201804-N5	Minor	5.3.3	08/06/2018	Upgraded to Major NC
1638637-201804-N6	Minor	5.1.2	08/06/2018	Upgraded to Major NC
1850488-201906-M1	Major	4.6.11	14/11/2019	Closed out on 14/02/2020
1850488-201906-M2	Major	4.7.5	14/11/2019	Closed out on 14/02/2020
1850488-201906-M3	Major	2.1.1	14/11/2019	Closed out on 14/02/2020
1850488-201906-M4	Major	6.5.3	14/11/2019	Closed out on 14/02/2020
1850488-201906-M5	Major	5.1.1	14/11/2019	Closed out on 14/02/2020
1850488-201906-M6	Major	5.1.2	14/11/2019	Closed out on 14/02/2020
1850488-201906-M7	Major	5.3.3	14/11/2019	Closed out on 14/02/2020
1850488-201906-N1	Minor	2.1.3	14/11/2019	Closed out on 18/12/2020
1850488-201906-N2	Minor	4.4.1	14/11/2019	Closed out on 18/12/2020
1850488-201906-N3	Minor	5.2.4	14/11/2019	Closed out on 18/12/2020
2002375-202012-M1	Critical	2.1.1	18/11/2020	Closed out on 24/2/2020
2002375-202012-M2	Critical	6.2.2	18/11/2020	Closed out on 24/2/2020
2002375-202012-M3	Critical	3.6.2	18/11/2020	Closed out on 24/2/2020
2002375-202012-M4	Critical	3.8.2	18/11/2020	Closed out on 24/2/2020
2002375-202012-M5	Critical	3.8.16	18/11/2020	Closed out on 24/2/2020

2002375-202012-N1	Minor	2.2.2	18/11/2020	Upgraded to Major NC
2002375-202012-N2	Minor	3.4.2	18/11/2020	Closed out on 25/11/2021
2002375-202012-N3	Minor	7.3.2	18/11/2020	Closed out on 25/11/2021
2136260-202111-M1	Critical	2.2.2	25/11/2021	Closed out on 11/2/2022
2136260-202111-M2	Critical	3.6.1	25/11/2021	Closed out on 11/2/2022
2136260-202111-N1	Minor	4.2.2	25/11/2021	Open
2136260-202111-N2	Minor	7.3.1	25/11/2021	Open

### 3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss *FGV Belitong* 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)
Internal	Gender Communities	face to face interview
Internal	Workers representative	face to face interview
External	Contractor	face to face interview

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks:</b>            Female Workers – They informed that they were treated equally without discrimination of gender. They were briefed on the new mother needs implemented by the company. However, there was no new mothers in all the operating units. They informed that there was no sexual harassment or violence case reported.</p> <p><b>Management Responses:</b>            The management will continue to respect the rights of female workers.</p>

	<p><b>Audit Team Findings:</b> No other issue.</p>
2	<p><b>Feedbacks:</b> Workers' Representatives – They informed that they were elected by the workers to be the representatives of workers. Meeting was conducted with the management to discuss if there is any issue with the workers. Actions have been taken by management and kept them informed on the status of issue reported. There was no issue raise by the workers during the time of audit.</p>
	<p><b>Management Responses:</b> The management will act accordingly if there is any complaint reported.</p>
	<p><b>Audit Team Findings:</b> No other issue.</p>
3	<p><b>Feedbacks:</b> Contractors – They informed that no payment issue with FGV as they paid as per agreed term. They have signed agreement prior to provide service to FGV. One of the contractors informed that he did not pay the workers for public holiday wages and entitlement annual leave. Details refer to Indicator 2.2.2.</p>
	<p><b>Management Responses:</b> The management will ensure the contractors to comply with legal requirements in future.</p>
	<p><b>Audit Team Findings:</b> Refer to Indicator 2.2.2.</p>
4	<p><b>Feedbacks:</b> School's Representatives – He informed that they have good relationship with the management. The management will provide any assistance whenever requested. There was no issue on the attendance of student and no child labour was sighted.</p>
	<p><b>Management Responses:</b> The management will continue to maintain good relationship with the management.</p>
	<p><b>Audit Team Findings:</b> No other issue.</p>
5	<p><b>Feedbacks:</b> Settlers' Representatives and FFB Suppliers – They informed that they have attended meeting with the mill management to discuss the quality of FFB and other issues. There is no land dispute with FGV reported from the settlers. They understand the complaint procedure. They have good relationships with the management. The payment of sales of FFB was made as per agreed.</p>
	<p><b>Management Responses:</b> The management will continue to maintain good relationship with the settlers and FFB suppliers.</p>
	<p><b>Audit Team Findings:</b> No other issue.</p>
6	<p><b>Feedbacks:</b> Foreign Workers – They informed that the management treated them equally without any discrimination of nationalities and religion. They are offered with overtime based on voluntarily basis. There is no restriction on movement where they can go out any time after work. They kept their passport inside the passport lockers prepared by management or kept inside the cupboard inside their house. They were paid</p>

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	<p>according to Minimum Wage Order 2020 and legal requirements. However, one complaint lodged by the workers in Bukit Tongkat B Estate has yet to be resolved.</p> <p><b>Management Responses:</b> The management will continue to comply with the legal requirements and RSPO requirements.</p> <p><b>Audit Team Findings:</b> Details refer to 4.2.2.</p>
<b>7</b>	<p><b>Feedbacks:</b> Contractor’s workers – They informed that they have signed agreement with the employer and paid as per Minimum Wage Order 2020. Work on rest day and work on public holiday was paid according to Employment Act 1955. There is no any discrimination reported while working in the mill. They understand the procedure on how to report a complain if there is any.</p> <p><b>Management Responses:</b> The management will ensure the contractors to comply to the legal requirements.</p> <p><b>Audit Team Findings:</b> No other issue.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not Applicable as the Certification Unit has undergone the second cycle of replanting.					



Previous land owner / user comment	
	<p><b>Feedbacks:</b></p> <p><b>Audit Team verification and response:</b></p>
Not Applicable as the Certification Unit has undergone the second cycle of replanting.	

**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**

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that FGVPM Belitong has complied with the Malaysia National Interpretation 2019 of the RSPO P&amp;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 FGVPM Belitong is certified.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name: Muhamad Naquiuddin Mazeli</b>	<b>Name: NOROLSAIFUL HAZRI BIN HAMID</b>
<b>Company Name: BSI Services (M) Sdn Bhd</b>	<b>Company Name: FGV HOLDINGS BERHAD</b>
<b>Title: Lead Auditor</b>	<b>Title: SUSTAINABILITY SENIOR MANAGER</b>
<p><b>Signature:</b></p> 	<p><b>Signature:</b> <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></p> 
<b>Date: 25/2/2022</b>	<b>Date: 27 FEB. 2022</b>



**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance
<b>Principle 1: Behave ethically and transparently</b>		
<b>Criterion 1.1:</b> 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><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.            - Critical (Major) compliance -</p> <p>FGV has established SOP for information request from relevant stakeholders and documented in '<i>Komunikasi, Penglibatan dan Rundingan</i>' with Doc. No.: FGV/ML-1A/L2-Pr12 dated 01/06/2016. The objective of the SOP is to establish an effective system for communication between company and stakeholder.</p> <p>List of documents that made available upon request are as below:</p> <ol style="list-style-type: none"> <li>1. Minutes meeting</li> <li>2. Complaint report</li> <li>3. Land title</li> <li>4. Safety and Health Plan</li> <li>5. HCV report</li> <li>6. Stakeholder list</li> <li>7. SEIA assessment report and management plan</li> <li>8. Policies</li> </ol> <p>Belitong POM has issued memo dated 05/01/2021 and displayed at the notice boards in the mill's premise and linesite to inform stakeholders regarding the publicly available documents that could be access by them.</p> <p>Management of Bukit Tongkat B Estate have provided a memo to all stakeholders dated 13/01/2021 stating all the publicly available</p>	Complied

		documents in the estate, undersigned by the estate manager which was available for verification	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Information provided in both English and Bahasa Malaysia and accessible to all stakeholders in FGV Belitong Certification Unit upon request. Policies & guidelines were available in the company's website: <a href="https://www.fgvholdings.com/sustainability/policies-guidelines/">https://www.fgvholdings.com/sustainability/policies-guidelines/</a> .	Complied
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained. - Critical (Major) compliance -	FGVASSB Ulu Belitong Estate has implemented <i>Makluman dan Maklumbalas</i> and conducted briefing to the stakeholders on the publicly available document that could be requested, prevention of fire usage and complaint procedure on 01/11/2021. Seen the record of briefing.	Complied
1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	FGV has established SOP for information request from relevant stakeholders and documented in ' <i>Komunikasi, Penglibatan dan Rundingan</i> ' with Doc. No.: FGV/ML-1A/L2-Pr12 dated 01/06/2016. The objective of the SOP is to establish an effective system for communication between company and stakeholder.  Briefing of the procedure was conducted on 02/02/2021 to the workers in Bukit Tongkat B Estate and 01/11/2021 in FGVASSB Ulu Belitong.  Workers Affairs Clerk in Bukit Tongkat B Estate and Executive of FGVASSB Ulu Belitong has been appointed as Communication and Social Officer to provide information and receive complaints from stakeholder. Role and responsibilities have been outlined in the appointment letter dated 01/01/2021 and 04/01/2021 respectively.  There was no physical stakeholder meeting conducted for Y2021 due to outbreak of Covid-19 pandemic. The management of FGVASSB Ulu Belitong Estate and Belitong POM has approached to	Complied

		the stakeholders to brief them on the publicly available document that could be requested, prevention of fire usage and complaint procedure, company's policies on 01/11/2021 in FGVASSB Ulu Belitong Estate and 25/10/2021 in Belitong POM. There was no issue received by the management from stakeholders.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Bukit Tongkat B Estate, FGVASSB Ulu Belitong Estate has established List of Stakeholders where details of the stakeholders such as address, contact person and contact numbers are available in the stakeholder list. Date of last update for Bukit Tongkat B Estate on 01/09/2021, 22/01/2021 in FGVASSB Ulu Belitong Estate and 02/01/2021 in Belitong POM.	Complied
<b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	FGV Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020) was developed. The policy has detailing the responsibility and compliance to the policy and FGV's commitment to sustainability. Besides, Code of Business Conduct and Ethics (CoBCE) for Employees (Policy No.: FGV/GHR/POL/039 Rev. 4.0) was established which incorporated various aspect of committing to a code of ethical conduct and integrity and each of the employees need to read through the policy and accepted via online. The Supplier Code of Conduct was available in the company's website (Doc. Version 001.05.2020) which outlined the business ethics& integrity for all the suppliers with FGV Holdings Berhad and all the contractors and suppliers have to sign on the SCOC. Belitong POM has conducted briefing of CobCE to the workers on 26/11/2021 and 28/11/2021.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Implementation and monitoring of the compliance of the policy was conducted through agreement and the Supplier Code of Conduct (SCOC), Doc. Version 001.05.2020. The contractors signed the	Complied

		<p>SCOC during the awarding and signed on <i>Surat Perintah Kerja (SPK)</i>. Sampled the SCOC for contractors as below:</p> <ol style="list-style-type: none"> <li>1. Masaki Enterprise dated 31/07/2021</li> <li>2. Zaidan Joyoo Enterprise dated 30/05/2021</li> <li>3. Bukit Tongkat Enterprise dated 07/01/2021</li> <li>4. Hamid Engineering &amp; Enterprise dated 08/12/2020</li> </ol>	
<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p><b>(C)</b> The Unit of Certification complies with legal requirements            - Critical (Major) compliance -</p>	<p>Belitong POM and its Supply Bases continued to comply with the legal requirements. Compliance to each applicable law and regulation are monitored by the operating units. The certification unit obtained and renewed license and permits as required by the law. Among others, the licenses/permit viewed were:</p> <p><u>Belitong POM</u></p> <ol style="list-style-type: none"> <li>1. MPOB License; License Number: 50017090400; Possessing Capacity: 288, 000 mt a year; License Expiry Validity Period: 01/04/2021.</li> <li>2. Energy Commission – Private Installation License; License Number: 2020/02951; Serial Number: 47095; License Validity Period: 29/11/2020 – 28/11/2021.</li> <li>3. DOE License; License Number: 003898; License Validity Period: 01/07/2021 – 30/06/2022.</li> <li>4. Permit Barang Kawalan Berjadual; Serial Number: J 003063; Reference Number: BPGK JH (KLU) 1193 SK; Description: Diesel (22, 500 Liters) and Petrol (200 Liters); License Validity Period: 31/07/2021 – 30/07/2023.</li> </ol>	Complied

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		<p>5. River Water Abstraction and Diversion License; File Number: BAKAJ/334/300/05/07/08/1; License Number: 08/A/Klg/016; Year: 2021; Maximum Abstraction: 600 m<sup>3</sup>/day; License Expiry Date: 31/12/2021.</p> <p><u>FGVPM Bukit Tongkat B Estate</u></p> <ol style="list-style-type: none"> <li>1. MPOB License; License Number: 558895002000; Estate Area: 1237.85 Ha; License Validity Period: 01/03/2021 – 28/02/2022.</li> <li>2. Permit Barang Kawalan Berjadual; Serial Number; PJ00347; Reference Number: BPGK JH (KLU) 2303 SK; Description: Diesel (15, 000 Litres) and Petrol (200 Litres); License Validity Period: 04/02/2021 – 03/02/2022.</li> </ol> <p><u>FGVPM Ulu Belitong</u></p> <ol style="list-style-type: none"> <li>1. MPOB License; License Number: 503540902000; Estate Area: 147.7 Ha; License Validity Period: 01/09/2021 – 31/08/2022.</li> </ol> <p>DOE Competency Certificate; CePSWaM Competent Person: Saidatuladhha Hj. Abdul Rahman; Date of Certificate: 09/01/2013</p> <p>FGV Plantations (Malaysia) Sdn Bhd has obtained approval from <i>Jabatan Tenaga Kerja Semenanjung Malaysia</i> to make deduction of wages for additional electricity bill, water bill and medical cost after subsidized by the company. (Company subsidized RM 4 for water bill, RM 6 for electricity bill and RM 200 for medical cost). The approval permit with Ref. No.: (22) dlm BHG. PU/9/129 Jld 23 dated 26/04/2016 was sighted. This permit is applicable for all the subsidiaries under FGV Plantations (Malaysia) Sdn Bhd.</p>	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	Identification and documentation of applicable legal requirements is guided by Manual Procedure, Legal and Other Requirements (FPI/L2/QOSHE 2.0, 29/11/2016).	Complied

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	<p>- Minor compliance -</p>	<p>The applicable legal requirements for the mill and estate were registered in "Daftar Perundangan dan Lain-lain Keperluan" (Register of Legal and Other Requirements) (FPI/L4/QOSHE-2.1 Pind 0) which was last updated on 05/12/2020. The register has info about Legal and Other Requirements, Enforcement Body, Main requirement, Enforcement standard, Penalty (RM), Responsible Departments and Compliance status.</p> <p>Tracking system to identify changes in the relevant regulations were available through the head office, website information and is communicated from the Group Head Office. Sighted the latest review to include new updates for Workers Minimum Standards of Housing and Amenities (Amendment) Act 2019, Minimum Wages Order 2020, Auxiliary Police Regulations 1970 &amp; Akta Pencegahan &amp; Pengawalan Penyakit Berjangkit 1988.</p> <p>On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operation. Tracking system on any changes in the law had been well implemented.</p>	
<p>2.1.3</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>1. FGV PISB Belitong POM is situated on the land owned by Lembaga Kemajuan Tanah Persekutuan (FELDA). There is an agreement between FELDA and Felda Palm Industries Sdn Bhd. dated 25th Nov 2016 which states grants the license to occupy a portion of the land situated within the area identified as Ulu Belitong Scheme measuring approximately 13.51 hectares whereon a building has been built for the purpose of oil palm mill and such other related purposes. Boundary Stone verification was conducted by Geomap GPS Solution dated 03/11/2020. The boundary stones are well maintained and monitored by the mill management monthly.</p>	<p>Complied</p>

		<p>2. Ulu Belitong Estate boundary was clearly demarcated with fences and roads. The boundary stones were verified to be well maintained by the management. Sighted the boundary at Peringkat 1, Block 10 of Ulu Belitong Estate, adjacent to Felda Settlers Housing Area and FGVPM Bkt Tongkat.</p> <p>3. FGVPM Bkt Tongkat B Estate’s legal boundary was clearly demarcated with fences as sighted at field PM 10H Block 2 adjacent with Felda Bkt Tongkat and PM 00H and PM 14N adjacent with Kluang Forest Reserve.</p>	
<p><b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>Stakeholder list was updated in all the estates and mill which included the contractors &amp; suppliers. Besides, the list of FFB suppliers were developed and maintained in Belitong POM.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>The contractors engaged by the company have signed the Supplier Code of Conduct (SCOC) where under Clause 3.1 – Compliance with Labour Laws and Prohibition of Forced Labour has clearly mentioned that the contractors shall comply with the laws and regulations including the recruitment process. Sampled the SCOC as below:</p> <ol style="list-style-type: none"> <li>1. Masaki Enterprise dated 31/07/2021</li> <li>2. Zaidan Joyoo Enterprise dated 30/05/2021</li> <li>3. Bukit Tongkat Enterprise dated 07/01/2021</li> <li>4. Hamid Engineering &amp; Enterprise dated 08/12/2020</li> </ol> <p>Reviewed the payslips of the contractor’s workers (Zaidan Joyoo Enterprise - I/C No.: 890117-01-57XX and 880822-01-54XX) in Bukit Tongkat B Estate on August 2021 and October 2021 found that the workers did not pay for the public holiday wages. Besides, the workers did not entitle for paid annual leave as per agreed in</p>	Non-compliance

		<p>the employment contract. This has confirmed through interview with the contractor.</p> <p>The minor non-conformance was escalated to major non-conformance due to recurrence of the same indicator during ASA2.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>The contractors engaged by the company have signed the Supplier Code of Conduct (SCOC) where under Clause 3.2 – Prohibition of Child Labour has clearly mentioned that the contractors shall not use child labour which is under the age of 18. Sampled the SCOC as below:</p> <ol style="list-style-type: none"> <li>1. Masaki Enterprise dated 31/07/2021</li> <li>2. Zaidan Joyoo Enterprise dated 30/05/2021</li> <li>3. Hamid Engineering &amp; Enterprise dated 08/12/2020</li> </ol> <p>Reviewed the legal identity documentation found that no child labour was used by the contractors.</p>	Complied
<b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>The mill has 2 estates supplying FFB within the certification scope and 24 supply base supplying FFB from outside the certification scope (11 estates and 13 collection centres). The mill has compiled the evidences for all its suppliers on the 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 and valid MPOB license. Sampled the documents as below:</p> <ol style="list-style-type: none"> <li>1. Aras Keysha Enterprise; MPOB License Number: 618863015000; License Validity Period: 01/11/2021 – 31/10/2022.</li> </ol>	Complied



		<p>2. Bakti Mas Bina Sdn Bhd; MPOB License Number: 522819015000; License Validity Period: 01/08/2021 – 31/07/2022.</p> <p>3. Eng Huat Latex Concentrate Sdn Bhd; MPOB License Number: 505907315000; License Validity Period: 01/05/2021 – 30/04/2022.</p> <p>4. Felda Ulu Penggeli; Estate Area: 1572.71; MPOB License Number: 500883502000; License Validity Period: 01/04/2021 – 31/03/2022.</p> <p>Felda Layang – Layang; Estate Area: 748.04 Ha; MPOB License Number: 500948302000; License Validity Period: 01/04/2021 – 31/03/2022.</p>	
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>There are 13 collection centres registered in the mill’s list of FFB suppliers. The mill is in the process of obtaining the information mentioned in Indicator 2.3.1 of the indirectly sourced FFB.</p>	Complied
<p><b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b></p>			
<p><b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p><b>(C)</b> 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>FGVPISB Belitong POM</p> <p>The mill has available a business management plan in the form of an Annual Budget 2021 to guide the management and expenditure for the year. A 5 years business management plan is available to include Operational Parameters (FFB), FFB Processed, OER, CPO, KER, and PK among others. A 10-year plan (2022 – 2031) is available for FFB process and processing cost.</p> <p>FGVPM Ulu Belitong Estate</p>	Complied

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		<p>The estate has available a business management plan in the form of an annual budget for the year 2021. A 3-year budget forecast for the year 2022 – 2024 was available which includes Total Crop, Harvesting &amp; Collection Cost and Upkeep &amp; Maintenance Cost.</p> <p>FGVPM Bkt Tongkat Estate</p> <p>The estate has available a business management plan, planned for 5 years (2022 – 2026). The Production Estimation 2022 – 2026 includes estimated FFB tonnage expected to be produced from each of the estate’s fields for the next 5 years, to assist in the estate management planning.</p>																			
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>Annual Replanting Programme was available in the states which was reviewed on a yearly basis. The replanting programme was verified as below:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Ulu Belitong Estate</td> <td>nil</td> <td>nil</td> <td>nil</td> <td>nil</td> <td>nil</td> </tr> <tr> <td>Bkt Tongkat Estate</td> <td>nil</td> <td>115.81</td> <td>nil</td> <td>nil</td> <td>nil</td> </tr> </tbody> </table>	Estate	2022	2023	2024	2025	2026	Ulu Belitong Estate	nil	nil	nil	nil	nil	Bkt Tongkat Estate	nil	115.81	nil	nil	nil	Complied
Estate	2022	2023	2024	2025	2026																
Ulu Belitong Estate	nil	nil	nil	nil	nil																
Bkt Tongkat Estate	nil	115.81	nil	nil	nil																
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Management Review is conducted annually to address the issues on non-conformities raised during internal audits, customer feedbacks, production performance, environmental &amp; social issues and continuous improvement plans. The management review meeting minutes were available for verification as below:</p> <ol style="list-style-type: none"> <li>FGVPISB Belitong POM: 01/10/2021</li> <li>Ulu Belitong Estate: 18/10/2021</li> <li>FGVPM Bkt Tongkat B Estate: 01/09/2021</li> </ol>	Complied																		

<p><b>Criterion 3.2:</b> The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
3.2.1	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The action plan for continual improvement has been established and implemented by the mill and estate based on considerations of the main social and environmental impacts and opportunities. It was documented in "Objektif Tahunan QOSHE 2021" (QOSHE Annual Objectives 2021). Sampling in FGV AS Ulu Belitong</p>	Complied
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b>            The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.            Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>From the RSPO Metrics Template 2.1, the data was accurate as per verification on site document such as land statement, GHG data, and others.</p>	Complied
<p><b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Documented Standard Operating Procedures (SOPs) for FGVPISB Belitong POM were available and maintained in a file. There were 141 SOPs [doc. No.: FPI/L3/1-01 to FPI/L3/16-01] in total which covered the entire operation of the mill including administration. The SOPs were established on 2/1/2001 and last updated on 23/10/2017.</p> <p>For the estate, "<i>Manual Ladang Sawit Lestari</i>" (Oil Palm Plantation Sustainability Manual), Third Edition, dated 1/9/2017 is in place.</p>	Complied

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3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	Routine supervision is the main mechanism to check consistent implementation of procedures. Apart from that, visits by advisories for mill and plantation (e.g. agronomist), enhance the monitoring of operations. There were also internal audits conducted by a group of internal auditors from SCCD to ensure conformance to sustainability standards.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	Records of monitoring and actions taken were documented in various forms such as agronomist report, internal audit report, management review meetings, workplace inspections, to name a few. All the records were available for verification, e.g.: <ul style="list-style-type: none"> <li>• Agronomist Visit to Bukit Tongkat B Estate on 22/03/2021</li> <li>• Internal Audit conducted on 09 – 13/08/2021 at Bukit Tongkat B Estate and Ulu Belitong Estate and Belitong POM.</li> </ul>	Complied
<b>Criterion 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	SIA was conducted on 24/01/2018 for Bukit Tongkat B Estate, 23/01/2018 for FGVASSB Ulu Belitong and 23/01/2018 for FGVPIB Belitong POM by the Certification & Due Diligence Sustainability & Environment Department. The methodology of the assessment was through sampling of stakeholders to be interviewed. Positive and negative impacts were identified and incorporated into the Management Plan. The Department has planned to carry re-assessment of SIA on March 2022.  From the aspect and impact of environmental (RSPO 2010(kriteria 5.1/5.3/5.6) no document 1/2021 already been review for each activity in estate and reviewed dated 27/2/2021. This included activity on manuring, spraying, efb application and others.	Complied

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3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Social Management Plan was developed in FGVPI SB Belitong POM on 13/02/2021 and FGVASSB Ulu Belitong Estate on 09/11/2021. The impact/ issue raised during assessment were recorded in the management plan. For eg:</p> <ol style="list-style-type: none"> <li>1. Impact: Process to renew passport and permit slow.            Actions to be taken: To submit the passport 2 months before the expiry date.            Status: Seen the list of permits that expired on November 2021 and the management has submitted to HQ for renewal on 21/09/2021. Seen the <i>Borang Pengesahan Penyambungan Permit/ Penamatan Kontrak TKL</i>.</li> </ol>	Complied
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The management plan was reviewed on yearly basis in FGVASSB Ulu Belitong Estate and FGVPI SB Belitong POM. The latest review was conducted on 09/11/2021 in FGVASSB Ulu Belitong Estate and 13/02/2021 in FGVPI SB Belitong POM. The impact raised and reviewed for Year 2020 as sampled below:</p> <ol style="list-style-type: none"> <li>1. Issue: Workers who work for more than 4 years have yet to receive the bonus of long service.            Action to be taken: The process is ongoing and waiting for the turn.            Status: Seen the application (Ref. No.: (02) TKL/ Bonus/2021 Pt.2 dated 22/07/2021) for the bonus to HQ and email correspondence dated 30/09/2021 was sighted. The payment is in progress.</li> </ol>	Complied
<p><b>Criterion 3.5:</b> 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>FGV has developed <i>Garis Panduan Pengambilan &amp; Perlantikan Pekerja Am G7</i> (Doc No.: 2020/1, Rev. 3 dated 01/05/2020) for the mill of FGV Palm Industries Sdn Bhd. The procedure has</p>	Complied

	<p>- Minor Compliance -</p>	<p>explained the process of recruitment of general workers in the mill. Besides, policy for performance management, termination of employment (dated 04/12/2019) and Compensation Policy (dated 01/01/2020) was developed to explain the process of promotion, retirement and termination of employment.</p> <p>In addition, Collective Agreement (Cog. No.: 031/2020) which valid from 01/01/2019 to 31/12/2021 was available to explain the criteria of promotion, retirement, resignation and termination.</p> <p><i>Jabatan Tenaga Kerja</i> FGV has developed a list of Policy and Procedure with the name <i>Senarai Utama Polisi dan SOP Jabatan Tenaga Kerja (JYK)</i>. 'Proses Socialisasi &amp; Temuduga' with Doc. No.: FGV/FGVPM-JTK/SOP/003 dated 01/09/2019 for recruitment of foreign workers is part of the procedure.</p> <p>FGV Group has established Guidelines and Procedures for Responsible Recruitment of Foreign Workers dated 27/06/2019 which available in company's website, <a href="#">12</a>. The procedure is to set a guideline and adopt the principles in Group Sustainability Policy including non-discrimination, respect for human rights and labour rights. The procedure has outlined the whole process starting from recruitment, hiring, employment and post-employment.</p>	
<p>3.5.2</p>	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Advertisement of the job vacancy was sighted and criteria of the vacancy was outlined in the advertisement. Interviewed with the Assistant Manager and Clerk confirmed that the advertisement will be displayed at the office area and surrounding of FGV settler's such as restaurant and mosque.</p>	<p>Complied</p>

		<p>Records of employment the job such as Application for Employment, photocopy of identification card, medical check-up and offer letter were maintained and available. The last recruitment of new employee was on 19/04/2021 in Bukit Tongkat B Estate and September in FGVPIB Belitong POM.</p>	
<p><b>Criterion 3.6:</b> An occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.            - Critical (Major) compliance -</p>	<p>All operations were risk assessed to identify H&amp;S issues in the estate and mill. Mitigation plans and procedures were documented and implemented as verified below.  <u>FGVPISB Belitong POM</u></p> <ol style="list-style-type: none"> <li>1. HIRADC was available to assess all risks and hazards in the mill operations. Nevertheless, the HIRADC did not identify hazards as verified below;               <ul style="list-style-type: none"> <li>• Based on the accident records in the mill there were 2 accidents related to bodily injury while working at the Kernel Station (Rolek) for the past 2 years. Verification done on the HIRADC for Kernell Station dated 01/11/2021 indicated that the hazard was has not identified.</li> <li>• Based on the visit to the Mill Ramp, it was noticed that the ramp attendants were using Stihl Blower at the station. The Ramp Station HIRADC did not capture the possible hazards from this operation.</li> <li>• Visit to the Mill Ramp, it was identified that the Showel did not have reverse siren. The HIRARC did not capture the possible hazards that could lead from the Showel Reversing without siren.</li> </ul> </li> <li>2. CHRA was conducted by Occumed Consultancy &amp; Services Sdn Bhd Sdn Bhd (Assessor Registration Number: JKPP HQ/10/ASS/00/8) on 18/05/2021. The CHRA Report (Report</li> </ol>	<p>Non-compliance</p>

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		<p>Number: JKPP HQ/10/ASS/00/8 2021/061) was available for verification.</p> <ol style="list-style-type: none"> <li>3. Noise risk Assessment (Dosh Reg: No: JHK 3886) was conducted by MZ Enviro Testing and Consulting Sdn Bhd (NRA Registration Number: HQ/16/PEB/00/158) on 05/02/2020 to determine whether any of the employees are exposed to excessive noise as per Occupational Safety and Health (Noise Exposure) Regulations 2019. The NRA Report (Report Number: HQ/LPROYKPEB/20/00106) was available for verification.</li> <li>4. Annual Baseline Audiometric Test was conducted by Industry Safety Management Services on 26/09/2020 to ascertain the hearing ability of the employees in certain frequency range as stipulated in the regulations. The results showed that out of 70 workers tested, 1 worker was diagnosed with abnormal hearing 1 worker was diagnosed with standard threshold shift. The worker with STS was retested on 01/07/2021. The annual baseline audiometric test for 2021 was conducted on 05/11/2021 in the mill. The results have not been obtained yet.</li> <li>5. Annual Medical Surveillance was conducted for 23 workers of FGVPIB Belitong POM on 19 – 27 April 2021 based on the recommendation of the latest CHRA report done in 2021. The medical surveillance was conducted by Poliklinik Intan (OHD: JKPP HQ/08/DOC/00/468). Biological Monitoring were done for workers exposed to n-Hexane, Manganese and Chromium. Results showed that all workers were within the normal limit with no evidence of poisoning.</li> </ol> <p><u>FGVPM Ulu Belitong Estate</u></p>	
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		<ol style="list-style-type: none"> <li>1. HIRADC was used to assess all risks identified by the estate. The HIRARC available were FFB Harvesting, Spraying, Manuring, Transport Workers to Estate, Rat Baiting, FFB Platform Construction and Field Grading. All HIRARC were reviewed on 21/02/2020.</li> <li>2. CHRA was conducted in the estate to assess the risk associated to hazardous chemicals in the estate. The CHRA Report (Report Reference Number: HQ/17/ASS/00/00002 – 2019/052) was available dated 03/12/2019. The assessment was conducted by Chan Ying Hou (JKKP HQ/17/ASS/00/00002).</li> </ol> <p><u>FGVPM Bkt Tongkat B Estate</u></p> <ol style="list-style-type: none"> <li>1. HIRADC was used to assess all the risks and hazards involved in the daily work operations. Appropriate trainings have been provided to the workers based on the control measures derived from the HIRADC.</li> <li>2. CHRA Assessment was conducted on 29/09/2020 by Occumed Consultancy &amp; Services Sdn Bhd (DOSH Registration: JKKP HQ/10/ASS/00/8) to assess the risks associated with hazardous chemicals used in the estate. The CHRA Report (Reference Number: JKKP HQ/10/ASS/00/8 2020/078) was available for verification. The recommendations provided by the assessor have been successfully implemented by the management.</li> <li>3. Noise Risk Assessment was conducted by Handstech Solution Services Sdn Bhd on 14/09/2021. The Assessment was conducted by assessor (JKKP Number: JH/14/PEB/00/136); The NRA Report (Report Number: HQ/14/PEB/00/136) was available for verification.</li> </ol>	
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3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The effectiveness of the HIRARC is monitored and ensured through checklist and trainings that were conducted by Belitong POM and Supply Base Estates in each of the operations. Site visits around the mill and estates indicated the control measures of the HIRARC were followed and ensured by the respective managements.</p>	Complied														
<p><b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>																	
3.7.1	<p><b>(C)</b> 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&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>A training programme has been developed and available in the Training Requirement for Operating Units (Mills &amp; Estate). The trainings were sighted to have included Gender Specific Training and involves staffs and workers.</p> <p>Covid-19 training and briefings were sighted at the mill and estates. Interview with the workers and staff indicated that they were aware on the SOP during the RMCO such as social distancing, regular sanitization and use of PPE (Face Mask).</p>	Complied														
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Records of trainings were maintained by the Mill and all estates as below: -</p> <p>FGVPISB Belitong POM</p> <table border="1" data-bbox="1151 995 1928 1246"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Road Safety Campaign</td> <td>04/05/2021</td> </tr> <tr> <td>Chemical Handling Training</td> <td>08/04/2021</td> </tr> <tr> <td>PPE Training</td> <td>10/05/2021</td> </tr> <tr> <td>HIRARC Training</td> <td>14/04/2021</td> </tr> </tbody> </table> <p>FGVPM Ulu Belitong Estate</p> <table border="1" data-bbox="1151 1337 1928 1378"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Training	Date	Road Safety Campaign	04/05/2021	Chemical Handling Training	08/04/2021	PPE Training	10/05/2021	HIRARC Training	14/04/2021	Training	Date			Complied
Training	Date																
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Training	Date																

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		<table border="1"> <tr><td>Health Briefing</td><td>27/01/2021</td></tr> <tr><td>Freedom of Speech and Association Training</td><td>20/10/2021</td></tr> <tr><td>Sexual Harassment Training</td><td>19/10/2021</td></tr> <tr><td>ERP Training</td><td>18/10/2021</td></tr> <tr><td>Safety and Health Policy Training</td><td>13/09/2021</td></tr> <tr><td>Harvesting Training</td><td>27/07/2021</td></tr> <tr><td>Triple Rinse Training</td><td>15/07/2021</td></tr> <tr><td>Environment, HCV &amp; Open Burning Training</td><td>17/06/2021</td></tr> </table>	Health Briefing	27/01/2021	Freedom of Speech and Association Training	20/10/2021	Sexual Harassment Training	19/10/2021	ERP Training	18/10/2021	Safety and Health Policy Training	13/09/2021	Harvesting Training	27/07/2021	Triple Rinse Training	15/07/2021	Environment, HCV & Open Burning Training	17/06/2021		
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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>FGVPM Bkt Tongkat B Estate</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr><td>Harvesting Training</td><td>14/11/2021</td></tr> <tr><td>Handling of Sharp Objects Training</td><td>08/05/2021</td></tr> <tr><td>Rat Baiting Training</td><td>19/01/2021</td></tr> <tr><td>FFB Loading Training</td><td>18/03/2021</td></tr> <tr><td>Spraying Training</td><td>10/02/2021</td></tr> <tr><td>First Aid Training</td><td>05/04/2021</td></tr> </tbody> </table>	Training	Date	Harvesting Training	14/11/2021	Handling of Sharp Objects Training	08/05/2021	Rat Baiting Training	19/01/2021	FFB Loading Training	18/03/2021	Spraying Training	10/02/2021	First Aid Training	05/04/2021	<p>Training for SCCS conducted by management to their staff dated 26/10/2021. Attended by Asistant manager, weighbridge operator, AQS and others.</p>	Complied		
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<b>Criterion 3.8:</b> Supply chain requirement for mills (note: All supply chain requirements are considered as <b>Critical (C)</b> . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	N/A	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Belitong Palm Oil Mill receives and process both FFB supplied from Ulu Belitong and Bukit Tongkat B estates (own supply base) and other third parties. Since the last assessment, it did not receive any certified FFB from any third parties. Approximately, the FFB received from its own supply base is less than 10% from the total FFB received.</p>	Complied
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>	Complied

3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Registration of transaction is done through the utilisation of RSPO Palmtrace. Verification of the RSPO Palmtrace showed that the mill has met all the registration and reporting requirements.	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>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.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ul>	<p>Belitong POM has a Standard Operating Procedures available to ensure implementation of RSPO SCCS available in the unit. Sighted the SOP for Mill RSPO SCCS; Doc Number: FGV/GSD-SCCD/SOP/007; Issue No: 1; Effective Date: 07/01/2021. The RSPO SCCS SOP covers the implementation of all the elements of the supply chain model requirements.</p> <p>Complete and up to date records that demonstrated compliance with the supply chain requirements were available and verified. Amongst the records verified was the RSPO SCCS Internal Audit Report, Management Review Meeting Minutes, RSPO SCCS Training Records, Mass Balance Sheets, Weighbridge Tickets of Incoming and Outgoing RSPO products.</p> <p>Belitong POM have appointed 9 personals as the committee members for RSPO SCCS in the mill to be responsible for the implementations of the SCCS requirements and compliance with all applicable requirements. The appointment letter dated 20/10/2021 undersigned by the Mill Manager was available for verification. Interview with the sampled personals (Weighbridge Clerk &amp; Auxiliary Police) indicated that they understood the SCCS procedures.</p> <p>Procedures for receiving and processing certified and non-certified FFBs including ensuring no false claim is done is mentioned in the SOP for Mill RSPO SCCS; Doc Number: FGV/GSD-SCCD/SOP/007; Issue No: 1; Effective Date: 07/01/2021.</p>	Complied
3.8.6	Internal Audit	FGV has developed Internal Audit Procedure (Doc. No.: ML-1A/L2-Pr11(0), Rev. 0 dated 1/6/2016) where the objective is to carry out internal audit to ensure implementation of RSPO, ISCC and MSPO.	Complied

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	<ul style="list-style-type: none"> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:               <ul style="list-style-type: none"> <li>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b. Effectively implements and maintains the standard requirements within its organisation.</li> </ul> </li> <li>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</li> </ul>	<p>The frequency of the internal audit to be carried out is at least once a year.</p> <p>The latest internal audit was carried out in FGVPISB Belitong POM by Sustainability Compliance &amp; Certification Department. The management have stated the corrective action plan and implemented the corrective action to address the non-conformity. The non-conformity was closed as stated in the management review for SCCS. The internal audit report and management review meeting minutes records were available for verification.</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> <li>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul>	<p>The mill received FFB from own certified supplying estates and neighboring settlers. Nota Hantaran BTB will be submitted to the mill during incoming of FFB from own supply bases and settlers. Information of the Nota Hantaran BTB was recorded in the WB system and MPR system by the Weighbridge Operator.</p> <p>Verified the certified CPO and PK production record from MPR system found that no overproduction was reported. FGV Group has developed Standard Operating Procedure for Mill RSPO SCC (Doc. No.: RSPO SCC, Issue 3, Rev. 5 dated 01/09/2019) where mechanism for handling of non-conformance material &amp; document was outlined in the procedure. Segregation of certified and non-certified material will be conducted in loading ramp.</p> <p><u>Certified</u>          Felda Ulu Belitong Estate          Despatch Note: 11722          Weighbridge Ticket: 01265921</p>	<p>Complied</p>

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		<p>Date: 30/8/2021          Field: Pkt 03 Blok 01          Tonnage: 3.31 mt          Transporter: Saiful Nizam Bin Misan          RSPO cert: RSPO 693230</p> <p>FGVPM Bukit Tongkat B          Despatch Note: 20/109810          Weighbridge Ticket: 01265334          Date: 25/8/2021          Field: Pkt 013 Blok 09          Tonnage: 5.33 MT          Transporter: Maslan Bin Salim</p>	
<p>3.8.8</p>	<p><b>Sales and Goods Out</b></p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> <li>The name and address of the buyer;</li> <li>The name and address of the seller;</li> <li>The loading or shipment / delivery date;</li> <li>The date on which the documents were issued;</li> <li>RSPO certificate number;</li> </ol>	<p>FGVPISB Belitong POM has ensured the required information is available in document form. Sampled of contracts as below:</p> <p>CSPO</p> <ul style="list-style-type: none"> <li>Sale Order No.: SI/9G56/9GAE/1021/01</li> <li>The name and address of the buyer: FGVT Bulkers Pasir Gudang</li> <li>The name and address of the seller: FGV Trading Sdn Bhd – Kilang Sawit Belitong, 86007 Kluang, Johor</li> <li>The loading or shipment/ delivery date: 30/10/2021</li> <li>The date on which the documents were issued: 30/10/2021</li> <li>RSPO certificate number: RSPO 693230</li> </ul>	<p>Complied</p>

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	<ul style="list-style-type: none"> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<ul style="list-style-type: none"> <li>• A description of the product, including the applicable supply Chain model (Identity Preserved or Mass Balance or the approved abbreviations): CPO – RSPO SCC (Mass Balance)</li> <li>• The quantity of the products delivered: 37.02 MT</li> <li>• Any related transport documentation: W/B Ticket# H00000817</li> <li>• A unique identification number: W/B Ticket# H00000817</li> </ul> <p>CSPK</p> <ul style="list-style-type: none"> <li>• Contract No.: RSPG6165F – 200 MT</li> <li>• The name and address of the buyer: FKP – Pasir Gudang</li> <li>• The name and address of the seller: FGV Trading Sdn Bhd – Kilang Sawit Belitong, 86007 Kluang, Johor</li> <li>• The loading or shipment/ delivery date: 18/07/2021</li> <li>• The date on which the documents were issued: 18/7/2021</li> <li>• RSPO certificate number: RSPO 693230</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Palm Kernel – RSPO SCC (Mass Balance)</li> <li>• The quantity of the products delivered: 45.8 MT</li> <li>• Any related transport documentation: W/B Ticket# L00000116</li> </ul> <p>A unique identification number: W/B Ticket# L00000116</p>	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> <li>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors</li> </ul>	<p>The mill does not outsource any of the activities to any third parties as verified during the audit. The transport of Certified RSPO CPO</p>	Complied



	<p>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</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>&amp; PK is done by FGV Transport, which is under the mother company of FGV Holdings.</p>	
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>Contractors are only used by the RSPO Certified FFB Suppliers to transport RSPO Certified FFB from the estate to the mill. No other contractors are used to physically handle any RSPO certified oil palm products. Details of the contractors were available in the mill which includes Contractor Name, Driver Name and Lorry Number.</p>	<p>Complied</p>
3.8.11	<p>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.</p>	<p>There were no new contractors used for the physical handling of RSPO certified products by the Mill.</p>	<p>Complied</p>

<p>3.8.12</p>	<p>Record keeping</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>iv) For Mass Balance Module, the mill:             <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ul> </li> </ul>	<p>FGVPISB Belitong Palm Oil Mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements. Procedure namely Mill RSPO SCC (Mass Balance), SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 has defined at least 2 years of retention time for all records and report.</p> <p>Mass balance recording is done through utilization of “<i>Lembaran Mass Balance</i>” (Mass Balance Sheet). Computerized system in place with the delivery deducted accordingly. Based on verification of Mass Balance Sheet, it was found that the certified CPO and PK were always delivered from positive stock.</p>	<p>Complied</p>
<p>3.8.13</p>	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The facility is using the actual extraction rate and therefore updating of rates is not necessary. the extraction rate can refer as Table no. 10</p>	<p>Complied</p>

3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	FGVPISB Belitong POM process FFB from both RSPO certified and uncertified plantations/estates therefore this indicator is not applicable.	Not Applicable
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Shipping announcements by the mill were represented by FGV marketing department located at Kuala Lumpur headquarters. The list of announcements made can be accessed in the RSPO PalmTrace. Based on sampling on document and verification as per below:-</p> <ul style="list-style-type: none"> <li>• Sale Order No.: SI/9G56/9GAE/1021/01</li> <li>• The name and address of the buyer: FGVT Bulkurs Pasir Gudang</li> <li>• The name and address of the seller: FGV Trading Sdn Bhd – Kilang Sawit Belitong, 86007 Kluang, Johor</li> <li>• The loading or shipment/ delivery date: 30/10/2021 announcement was on November 2021</li> <li>• The date on which the documents were issued: 30/10/2021</li> <li>• RSPO certificate number: RSPO 693230</li> <li>• A description of the product, including the applicable supply Chain model (Identity Preserved or Mass Balance or the approved abbreviations): CPO – RSPO SCC (Mass Balance)</li> <li>• The quantity of the products delivered: 37.02 MT</li> </ul>	Complied

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		The announcement of certified products delivery is made by the Logistics Department no longer than 3 months after the complete delivery contract in our RSPO Palm Trace	
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>	Procedure namely SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 was established. There is no claim made for RSPO logo & trademark in FGV PISB Belitong POM.	Complied
<b>General corporate communications</b>			
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.	Not Applicable as corporate communication is managed at FGV Holdings Berhad HQ level.	Not Applicable
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>a. Display its RSPO membership status</li> <li>b. Display the RSPO web address (www.rspo.org)</li> <li>c. State that the member supports the work of the RSPO</li> <li>d. State the member's history with regard to the RSPO.</li> <li>e. Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	Not Applicable as corporate communication is managed at FGV Holdings Berhad HQ level.	Not Applicable
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not Applicable as corporate communication is managed at FGV Holdings Berhad HQ level.	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 corporate communication is managed at FGV Holdings Berhad HQ level.	Not Applicable

4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Not Applicable as corporate communication is managed at FGV Holdings Berhad HQ level.	Not Applicable
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the shipping documents (i.e. weighbridge tickets, delivery order), the name of product/commodity with SCC model (e.g. PK MB) and RSPO certificate number.	Complied
5.3	<p>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:</p> <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>	FGVPISB Belitong POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
<b>Business to consumer communication</b>			

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6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified	Not Applicable as the facility does not involve with consumer end product.	Not Applicable

	<p>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 <a href="http://www.rspo.org">www.rspo.org</a>.</p>		
<b>MODULE B – MASS BALANCE SPECIFIC RULES</b>			
<b>Minimum Mass Balance content</b>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>Oil palm claimed for MB certified contain of 100% CPO or PK MB certified.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>Oil palm claimed for MB certified contain of 100% CPO or PK MB certified.</p>	<p>Complied</p>
<b>Labelling and trademark (MB)</b>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>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.</li> </ul>	<p>As at to date, no RSPO trademark used by FGVPISB Belitong POM.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> <li>The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</li> <li>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 &amp; Claims document.</li> </ul>		
<b>Messaging (MB)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>[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.</li> <li>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.</li> </ul> <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"> <li>Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</li> </ul>	<p>As at to date, no RSPO trademark used by FGVPIB Belitong POM.</p>	<p>Complied</p>
<b>Principle 4: Respect community and human rights and deliver benefits</b>			



<b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where the company committed to respecting human rights by upholding international human rights principles and standards as encapsulated in the Universal Declaration of Human Rights (UDHR), and other applicable international human rights treaties, subject to the laws and regulations of the countries and territories in which FGV Group operates. In fulfilling its responsibility to respect human rights, FGV Group is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs).</p> <p>Briefing of the policy was conducted on 21/01/2021 in Bukit Tongkat B Estate, 21/06/2021 in FGVASSB Ulu Belitong Estate and 04/05/2021 in Belitong POM.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>FGV prohibits any form of harassment in their operation as per the policy above. Interviewed with the workers confirmed that no harassment by the management.</p>	Complied
<b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>FGV has established SOP for "<i>Menangani Aduan dan Rugutan</i>" with Doc. No.: FGV/ML-1A/L2-Pr13 dated 01/04/2019. The procedure is to provide a system for the internal and external stakeholders to lodge complaint and grievances to the management.</p> <p>The complaints will be solved in 14 days (first stage), 14 days (second stage). The complaint has to be resolved within 2 months from the date of discussion in third stage if the issue needs to be escalated to <i>Wilayah Office</i>. Any issues that can be resolved within the operating unit, it has to be closed within 14 days.</p>	Complied

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		<p>Besides, whistleblowing channel and e-form was available in <a href="https://www.fgvholdings.com/whistleblowing/">https://www.fgvholdings.com/whistleblowing/</a> for the stakeholders to report a grievance.</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.</p> <p>- Minor compliance -</p>	<p>FGV has established SOP for "Menangani Aduan dan Rugutan" with Doc. No.: FGV/ML-1A/L2-Pr13 dated 01/04/2019. The procedure is to provide a system for the internal and external stakeholders to lodge complaint and grievances to the management.</p> <p>The complaints will be solved in 14 days (first stage), 14 days (second stage). The complaint has to be resolved within 2 months from the date of discussion in third stage if the issue needs to be escalated to <i>Wilayah Office</i>. Any issues that can be resolved within the operating unit, it has to be closed within 14 days.</p> <p>Besides, grievance reporting channels were published in the company's website, <a href="https://www.fgvholdings.com/whistleblowing/">https://www.fgvholdings.com/whistleblowing/</a>. The channels of reporting such as through letter, email, in person or Hotline Toll Free call. The whistleblowing e-form was available in <a href="https://www.fgvholdings.com/sustainability/grievance/#">https://www.fgvholdings.com/sustainability/grievance/#</a> for the stakeholders to report a grievance.</p> <p>Briefing of the procedure was conducted on 22/09/2021 to the workers in Bukit Tongkat B Estate, 05/05/2021 in FGVASSB Ulu Belitong and 26/04/2021&amp; 28/04/2021 in Belitong POM.</p> <p>Interviewed with the workers in the housing area in Bukit Tongkat B Estate told that they have requested for curtains due to direct sunlight to the room about one month ago but no action has been taken. Reviewed the Complaint and Request Logbook found that</p>	<p>Non-compliance</p>

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		<p>the complaint was recorded on 13/10/2021. The issue has yet to be resolved as per the SOP for "Menangani Aduan dan Rugutan" with Doc. No.: FGV/ML-1A/L2-Pr13 dated 01/04/2019 where if internal issue, it shall be resolved within 14 days.</p> <p>Thus, a minor non-conformance was raised.</p>	
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>Complaint and Request Logbook was implemented in Bukit Tongkat B Estate and FGVASSB Ulu Belitong while Belitong POM implemented Complaint and Grievance Form to record any complaints. Sampled of internal complaint as below:</p> <p>House No.: Seri Dahlia – <i>Asarama D</i> dated 05/05/2021</p> <p>Issue: Lighting in kitchen was malfunction.</p> <p>Status: The management has appointed contractor to carry out the repair work and seen the Work Order dated 12/05/2021 and invoice# I/21/0175 dated 31/05/2021. The worker has acknowledged after the work has been completed.</p> <p>House No.: 15C dated 15/09/2021</p> <p>Issue: Disturbance and damaged caused by monkey.</p> <p>Status: The management has informed the Wildlife Department on 27/10/2021 and letter to Wildlife Department was sighted. Besides, the management has chopped off the trees in the housing area and seen the photo evident. The issue still pending and waiting action from the authority. The Chairman of the Workers' Committee informed that the management has update the progress of the action taken to them.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to</p>	<p>As per SOP for Complaint &amp; Grievance (Doc no: FGV/ML-1A/L2-Pr13 issue 01, revision 02 dated 01/04/2019, under clause 7.1.4 (4<sup>th</sup> stages) 7.1.4.1 if there is no agreement after complaint lodges to the headquarters, the complaint can be escalated to <i>Jabatan</i></p>	Complied

	choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	<i>Perhubungan Perusahaan, Kementerian Sumber Manusia or Panel Aduan Persijilan Kelestarian</i> (RSPO or MSPO) as a solution.	
<b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	FGVP (M) Sdn Bhd has taken initiative to provide lunchbox/ food baskets to all the workers in Bukit Tongkat B Estate for 14 days from 15/06/2021 to 28/06/2021 for operation workers and 29/06/2021 to 12/07/2021 to artisan workers due to Movement Control Order 3.0 imposed by the government. Seen the memorandum dated 15/06/2021 and 28/06/2021 and List of Workers who received the lunchbox/ food baskets.  The mill also provided food basket to all the workers that worth RM 50. Seen the purchase order# 3301478707 dated 15/02/2021 for the food basket. Seen the record of recipients of the food baskets.	Complied
<b>Criterion 4.4:</b> 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	<b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available. - Critical (Major) compliance -	The government leased the land to FELDA for development. As per agreement letter between FELDA and FELDA Palm Industries Sdn Bhd dated 25/11/1996, FELDA granted a portion of land with approximately 13.51 ha for the purpose of oil palm mill. This agreement was valid from 01/01/1994 to 31/12/2023.  There was a new leased agreement between FELDA and FGV Agri Services Sdn Bhd dated 02/09/2020 for Ulu Belitong Estate. FELDA has leased a total of 157.12 ha and the validity of agreement was valid until 31/12/2046. Only 147.70 ha (Peringkat 1 and Peringkat 3) is under certified area and 9.42 ha (Peringkat 2) is not under scope of certification.	Complied

4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no dispute in FGVPISB Belitong POM, Ulu Belitong Estate and Bukit Tongkat B Estate as the land is belong to FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles confirmed that there is not any land dispute reported.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	There is no dispute in FGVPISB Belitong POM, Ulu Belitong Estate and Bukit Tongkat B Estate as the land is belong to FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles confirmed that there is no any land dispute reported.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	There is no dispute in FGVPISB Belitong POM, Ulu Belitong Estate and Bukit Tongkat B Estate as the land is belong to FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles confirmed that there is no any land dispute reported.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	There is no dispute in FGVPISB Belitong POM, Ulu Belitong Estate and Bukit Tongkat B Estate as the land is belong to FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles confirmed that there is no any land dispute reported.	Complied
4.4.3	<b>(C)</b> 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 -	Maps with identified legal boundaries were available. Verified the boundary between Bukit Tongkat B estate with the FELDA during site visit.	Complied

4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	There is no dispute in FGVPISB Belitong POM, Ulu Belitong Estate and Bukit Tongkat B Estate as the land is belong to FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles confirmed that there is not any land dispute reported.	Complied
4.4.5	<b>(C)</b> 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 -	There is no dispute in FGVPISB Belitong POM, Ulu Belitong Estate and Bukit Tongkat B Estate as the land is belong to FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles confirmed that there is not any land dispute reported.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There is no dispute in FGVPISB Belitong POM, Ulu Belitong Estate and Bukit Tongkat B Estate as the land is belong to FELDA. The estate's land is leased to FGV for Oil Palm Plantation activities. It was verified through the land titles confirmed that there is not any land dispute reported.	Complied
<b>Criterion 4.5:</b> 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	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	There was no new planting in Bukit Tongkat B Estate and FGVASSB Ulu Belitong Estate. There was no acquisition of new land sighted.	Not Applicable
4.5.2	<b>(C)</b> 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 -	There was no new planting in Bukit Tongkat B Estate and FGVASSB Ulu Belitong Estate. There was no acquisition of new land sighted.	Not Applicable

4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>There was no new planting in Bukit Tongkat B Estate and FGVASSB Ulu Belitong Estate. There was no acquisition of new land sighted.</p>	Not Applicable
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>There was no new planting in Bukit Tongkat B Estate and FGVASSB Ulu Belitong Estate. There was no acquisition of new land sighted.</p>	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>There was no new planting in Bukit Tongkat B Estate and FGVASSB Ulu Belitong Estate. There was no acquisition of new land sighted.</p>	Not Applicable
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>There was no new planting in Bukit Tongkat B Estate and FGVASSB Ulu Belitong Estate. There was no acquisition of new land sighted.</p>	Not Applicable
4.5.7	<p>New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.</p> <p>- Minor compliance -</p>	<p>There was no new planting in Bukit Tongkat B Estate and FGVASSB Ulu Belitong Estate. There was no acquisition of new land sighted.</p>	Not Applicable

4.5.8	<p><b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>There was no new planting in Bukit Tongkat B Estate and FGVASSB Ulu Belitong Estate. There was no acquisition of new land sighted.</p>	<p>Not Applicable</p>
<p><b>Criterion 4.6:</b> 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><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>FGV has developed procedure on "<i>Pengenalpastian dan penyelesaian pertikaian tanah</i>" with Doc. No. ML-1A/L1-Pr10(0) dated 01/06/2016. The objective of the procedure is to handle and monitor issue raised from local communities on customary or user rights. Procedure on the compensation to the people entitled and monitoring of boundary stone was detailing in the procedure. Compensation will be paid according to basic cost/ acre and market land price.</p>	<p>Complied</p>
4.6.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Refer to Indicator 4.6.1.</p>	<p>Complied</p>
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities, settlers and other stakeholders reported during the time of audit through interviewed with the local communities. Trenches and fencing were available to demarcate the boundary of land between the neighboring stakeholders.</p>	<p>Complied</p>
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities, settlers and other stakeholders reported during the time of audit through interviewed with the local communities. Trenches and fencing were available to demarcate the boundary of land between the neighboring stakeholders.</p>	<p>Complied</p>



<p><b>Criterion 4.7:</b> 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><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.                      - Critical (Major) compliance -</p>	<p>FGV has developed procedure on "<i>Pengenalpastian dan penyelesaian pertikaian tanah</i>" with Doc. No. ML-1A/L1-Pr10(0) dated 01/06/2016. The objective of the procedure is to handle and monitor issue raised from local communities on customary or user rights. Procedure on the compensation to the people entitled and monitoring of boundary stone was detailing in the procedure. Compensation will be paid according to basic cost/ acre and market land price.</p>	Complied
4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.                      - Critical (Major) compliance -</p>	<p>Refer to Indicator 4.7.2.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.                      - Minor compliance -</p>	<p>There is no customary right land in Bukit Tongkat B Estate and FGVASSB Ulu Belitong Estate. Therefore, the clause is not applicable.</p>	Not Applicable
<p><b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.                      - Minor compliance -</p>	<p>There is no customary right land in Bukit Tongkat B Estate and FGVASSB Ulu Belitong Estate. Therefore, the clause is not applicable.</p>	Not Applicable

4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	There is no customary right land in Bukit Tongkat B Estate and FGVASSB Ulu Belitong Estate. Therefore, the clause is not applicable.	Not Applicable
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	There is no customary right land in Bukit Tongkat B Estate and FGVASSB Ulu Belitong Estate. Therefore, the clause is not applicable.	Not Applicable
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	There is no customary right land in Bukit Tongkat B Estate and FGVASSB Ulu Belitong Estate. Therefore, the clause is not applicable.	Not Applicable
<p><b>Principle 5: Support smallholder inclusion</b></p>			
<p><b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	There are no smallholders in the Unit of Certification as defined by RSPO P&C 2018 (MYNI 2019). Therefore, this indicator is not applicable.	Not Applicable
5.1.2	<p><b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	There are no smallholders in the Unit of Certification as defined by RSPO P&C 2018 (MYNI 2019). Therefore, this indicator is not applicable.	Not Applicable

5.1.3	<p><b>(C)</b> 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>There are no smallholders in the Unit of Certification as defined by RSPO P&amp;C 2018 (MYNI 2019). Therefore, this indicator is not applicable.</p>	Not Applicable
5.1.4	<p><b>(C)</b> 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 are no smallholders in the Unit of Certification as defined by RSPO P&amp;C 2018 (MYNI 2019). Therefore, this indicator is not applicable.</p>	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.          - Minor compliance -</p>	<p>Contract Agreement between FGV Belitong POM and FFB Suppliers were available for verification. The contract agreement states the pricing of FFB that the oil mill uses to make payments. Sighted the contract agreements as below:</p> <ol style="list-style-type: none"> <li>1. AZ Iman Resources Sdn Bhd              Doc Number: (10) FGVPIB/FFBPD/92179; Date: 28/02/2019</li> <li>2. Aras Keysha Enterprise.              Doc Number: (01) FGVTSB/FFBPD/92247; Date: 02/03/2019</li> </ol>	Complied
5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.          - Critical (Major) compliance -</p>	<p>The contracts states that payments will be done within 60 days after the invoice is provided to the management. As of now, payments for FFB Suppliers are done on a weekly basis. The Payment Advice were verified to include the date, pass number, lorry number, OER, total FFB, FFB Price, penalty and total amount paid. Verified the payment records as below:</p> <ol style="list-style-type: none"> <li>1. FFB Supplier: Aras Keysha Enterprise             <ul style="list-style-type: none"> <li>• Doc Date: 24/11/2021</li> <li>• Document Number: 350096143</li> </ul> </li> </ol>	Complied

		<p>2. FFB Supplier: Fauzi Agro Enterprise</p> <ul style="list-style-type: none"> <li>• Doc Date: 24/11/2021</li> </ul> <p>Document Number: 350096142</p>	
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>There are 2 weighbridges at FGV Belitong POM used to weight the FFB received from FFB Suppliers. The weighbridge is calibrated annually to ensure the accuracy of the readings. Verified the records of weighbridge calibration as below:</p> <p><u>Weighbridge 1 (60 Mt)</u></p> <ol style="list-style-type: none"> <li>1. Receipt Number: B 1846919</li> <li>2. Weighbridge Serial Number: 200850750</li> <li>3. Safety Label Number: 2.1K Q027076</li> <li>4. Date: 10/07/2021</li> <li>5. Calibrated by: Metrology Corporation Malaysia Sdn. Bhd.</li> </ol> <p><u>Weighbridge 2 (80 Mt)</u></p> <ol style="list-style-type: none"> <li>1. Receipt Number: D 053090</li> <li>2. Weighbridge Serial Number: 0037008 – 6CN</li> <li>3. Safety Label Number: DE18 001656</li> <li>4. Date: 08/09/2021</li> </ol> <p>Calibrated by: Metrology Corpotation Malaysia Sdn. Bhd.</p>	Complied
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p>	<p>There are no smallholders in the Unit of Certification as defined by RSPO P&amp;C 2018 (MYNI 2019). Therefore, this indicator is not applicable.</p>	Not Applicable

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5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	There are no smallholders in the Unit of Certification as defined by RSPO P&C 2018 (MYNI 2019). Therefore, this indicator is not applicable.	Not Applicable
<b>Criterion 5.2:</b> 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 no smallholder in the complex as defined by RSPO P&C 2018 (MYNI 2019). Therefore, this indicator is not applicable.	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	There is no smallholder in the complex as defined by RSPO P&C 2018 (MYNI 2019). Therefore, this indicator is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There is no smallholder in the complex as defined by RSPO P&C 2018 (MYNI 2019). Therefore, this indicator is not applicable.	Not Applicable
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There is no smallholder in the complex as defined by RSPO P&C 2018 (MYNI 2019). Therefore, this indicator is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There is no smallholder in the complex as defined by RSPO P&C 2018 (MYNI 2019). Therefore, this indicator is not applicable.	Not Applicable
<b>Principle 6: Respect workers' rights and conditions</b>			

<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<p><b>(C)</b> 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>FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where no person shall be subjected to any discrimination in employment, including hiring, compensation, advancement, training, disciplinary action, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, gender identity, nationality, political opinion, social group, ethnic origin, reproductive rights or other forms of discrimination. Briefing of the policy was conducted on 21/01/2021 in Bukit Tongkat B Estate, 21/06/2021 in FGVASSB Ulu Belitong Estate and 04/05/2021 in Belitong POM.</p>	Complied
6.1.2	<p><b>(C)</b> 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>Interviewed and verified through salary slips shows that there is no discrimination in terms of salary payment especially for similar work scope. FGV has committed that no recruitment fee imposed to foreign workers.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Employment procedure was established, and details refer to indicator 3.5.1. Collective Agreement (Cog. No.: 031/2020) which valid from 01/01/2019 to 31/12/2021 has explained the criteria of promotion based on the capability, qualification and performance of interview of the candidates.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>There is no female worker works in mill process and estate operation. Female workers mainly work in the office of mill and estate. No pregnancy test been conducted for job selection. This is confirmed through the interview session with the female workers and reviewed the medical check up report.</p>	Complied
6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p>	<p>Gender committee/ KKD was established in Belitong POM and Bukit Tongkat B Estate. There was no female worker employed in FGVASSB Ulu Belitong.</p>	Complied

	- Critical (Major) compliance -	<p>Bukit Tongkat B Estate consists of 4 female workers and the meeting was conducted once a year. The last meeting was conducted on 04/01/2021. Meeting minutes was sighted. Company policies and functions of the committee was briefed during the meeting. Needs of new mother was discussed in the meeting. They have established Annual Programme of KKD to increase the side income of the female workers. Interviewed with the female worker in the estate confirmed that no case of sexual harassment and violence reported.</p> <p>Belitong POM has carried out the gender committee meeting on 02/11/2021 and seen the meeting minutes. No issue was reported.</p>	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	The female workers employed in FGV are local Malaysian. Female workers employed are generally office staffs. Reviewed payslips in Bukit Tongkat B Estate and Belitong POM which consists of male and female workers found that their salary is the same for the same job scope. They were paid according to the Minimum Wage Order 2020 without any discrimination. This has confirmed through interview with the workers comprises of female and male.	Complied
<p><b>Criterion 6.2:</b> 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).</p>			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	FGV Palm Industries Sdn Bhd has signed a Collective Agreement with <i>Kesatuan Pekerja-pekerja FGV Palm Industries Sdn Bhd Semenanjung</i> which valid from 01/01/2019 to 31/12/2021 (Cog. No.: 031/2020) which valid from 01/01/2019 to 31/12/2021. FGVASSB has developed <i>Manual Panduan Kadar Upah Kerja, Bil 07/2020</i> which effective on 01/02/2020. Details such as promotion, notice period, resignation, annual leave, increment of salary,	Complied

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		medical leave, maternity leave and overtime were outlined in the agreement. Sampled total 21 workers agreement for both local and foreign workers in mill and estate are reviewed. The agreements are signed in local language for different nationalities. Interviewed with the workers confirmed that they understood the terms and conditions of employment contracts and pay slips.	
6.2.2	<p><b>(C)</b> 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>	Sample of total 21 workers agreement are reviewed, and the agreements are signed in their local language for different nationalities. Terms and conditions are clearly outlined in the agreement.	Complied
6.2.3	<p><b>(C)</b> 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>	Reviewed total 21 payslips of the workers in mill and estate found that the wages of the workers are paid accordingly to the Minimum Wage 2020. Overtime was paid as per Employment Act 1955. Deduction was made accordance to the approval granted by <i>Jabatan Tenaga Kerja Semenanjung Malaysia</i> . Interviewed with the workers confirmed that they were understand on the terms and condition of the employment contract signed by them. They also understand the calculation on the wages and overtime shown in the payslips.	Complied
6.2.4	<p><b>(C)</b> 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>	All workers are provided with housing facilities that furnish with sanitation facilities, water supplies, electricity and amenities such praying facilities. Water and electricity are connected to the national supply and grid. Water are subsidized by the company for RM 4/ person and electricity are subsidized for RM 6/ person. These conditions are stated in the collective agreement. Reviewed the payslips found the workers were paid the subsidized amount accordingly.	Complied



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	<p>- Critical (Major) compliance -</p>	<p>Linesite inspection was conducted once a week by Workers' Welfare Officer using the checklist <i>Pemeriksaan Mingguan Kawasan Perumahan Pekerja Asing</i>. Any issues found during the inspection were recorded in the checklist and actions were taken accordingly. Seen the record of inspection from December 2020 to October 2021. The estate has allocated budget to construct new toilet for one of the toilets of workers. Seen the <i>Surat Perintah Kerja# 5600004592</i> which valid until 14/03/2022. Site visit to the housing facilities found in satisfactory condition.</p> <p>Supervisor of FGVASSB Ulu Belitong has conducted weekly linesite inspection by using <i>Borang Pemeriksaan Asrama Pekerja</i>. The last inspection was carried out on 19/11/2021 and no issue was sighted. Site visit to the housing facilities found in satisfactory condition. Interviewed with workers confirmed that no issue on housing facilities during the time of audit.</p> <p>Belitong POM has carried out weekly linesite inspection by using <i>Senarai Semak Kebersihan Rumah Petugas</i> by Assistant Manager. No issue was sighted.</p>	
<p>6.2.5</p>	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.          - Minor compliance -</p>	<p>Location of mill and estate was inside the vicinity of FGV Settlers village and access to town is available by public transport. Groceries shops and restaurants are sighted, and the workers are easily access to adequate, sufficient and affordable food. Interviewed with the workers confirmed that they have no issue with the food access.</p>	<p>Complied</p>
<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.  <b>PROCEDURAL NOTE:</b></p>	<p>Belitong Complex has established the prevailing wage calculation to include all the in-kind benefits provided to the workers. Sampled the prevailing wages for benefit of Housing – RM 350 for local workers and RM 150 for foreign workers; Healthcare for local workers is RM</p>	<p>Complied</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>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"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> </ul>	<p>77.30 and RM 23.45 for foreign workers. The prevailing wages is more than the Minimum Wage Order 2020.</p>	
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	<ul style="list-style-type: none"> <li>There is annual progress on the implementation of living wages</li> <li>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</li> <li>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.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>There is no casual, temporary and day workers employed in Bukit Tongkat B Estate, FGVASSB Ulu Belitong Estate and Belitong POM. All the employees are permanent employee. Sorters in POM are the workers of contractor and they are permanent. FFB transporter engaged by the estates was handle by contractor’s own family member and permanent local workers as verified the records of contractors.</p>	Complied
<p><b>Criterion 6.3:</b> 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><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where FGV Group recognises and respects employees’ right to freedom of association and to collective bargaining. Briefing of the policy was conducted on 21/01/2021 in Bukit Tongkat B Estate, 21/06/2021 in FGVASSB Ulu Belitong Estate and 04/05/2021 in Belitong POM.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Foreign Workers Committee meeting was last conducted on 12-13/10/2021 in FGVASSB Ulu Belitong to discuss welfare issues of the workers. Meeting minutes was available and issues raised were recorded in the meeting minutes. The issues raised were incorporated into the social management plan dated 09/11/2021.</p>	Complied

		Interviewed with the workers confirmed that the issues raised were explained by the management.	
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>The workers’ representatives in Bukit Tongkat B Estate and Belitong were elected by the workers during morning muster. The last election was conducted on 04/01/2021 in Bukit Tong B Estate and seen the photo evident of election.</p> <p>This has confirmed through interviewed with the workers’ representatives.</p>	Complied
<b>Criterion 6.4:</b> 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>FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where FGV is committed to employing only persons of the age of 18 and above, FGV recognises that Malaysian laws allow for young persons to be engaged in certain forms of employment. Therefore, no person shall be employed under the age of 15, and any employment of young persons shall not be in a manner that is likely to be hazardous, or to interfere with such person’s education, or to be harmful to the person’s health or physical, mental, spiritual, moral, or social development at any stage of the employment. The contractors have signed on the SCOC where under Clause 3.2 has outlined that they shall not employ child labour under age of 18. Briefing of the policy was conducted on 21/01/2021 in Bukit Tongkat B Estate, 21/06/2021 in FGVASSB Ulu Belitong Estate and 04/05/2021 in Belitong POM.</p>	Complied
6.4.2	<p><b>(C)</b> 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>The contractors have signed on the Supplier Code of Conduct where under Clause 3.2, contractors/ suppliers shall not use child labour who are under age of 18.</p> <p>For recruitment of foreign workers, the main criteria must be within 18 – 45 years old. Before interview for local worker, they are</p>	Complied

		<p>required to submit copy of certificate of education and identification card for age verification and declaration of age is required during the application.</p> <p>Reviewed the master list of employees found that no child labour was employed.</p>	
6.4.3	<p><b>(C)</b> 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>Reviewed the master list in Bukit Tongkat B Estate, FGVASSB Ulu Belitong and Belitong POM found that no young person was employed. All the workers 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>The contractors engaged by the company have briefed and signed on Supplier Code of Conduct (SCOC) as verified accordingly.</p>	Complied
<p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> 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>FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where FGV Group shall not tolerate any form of harassment and abuse including physical, sexual, psychological or verbal. Everyone shall be treated with respect and dignity. Briefing of the policy was conducted on 21/01/2021 in Bukit Tongkat B Estate, 21/06/2021 in FGVASSB Ulu Belitong Estate and 04/05/2021 in Belitong POM.</p>	Complied
6.5.2	<p><b>(C)</b> 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>FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where no person shall be subjected to any discrimination in employment, including hiring, compensation, advancement, training, disciplinary action, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, gender identity, nationality, political opinion, social group, ethnic origin, reproductive rights or</p>	Complied

		other forms of discrimination. Briefing of the policy was conducted on 21/01/2021 in Bukit Tongkat B Estate, 21/06/2021 in FGVASSB Ulu Belitong Estate and 04/05/2021 in Belitong POM.	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -	There was no new mother identified in Bukit Tongkat B Estate, FGVASSB Ulu Belitong Estate and Belitong POM as interviewed with the female staff to confirm. Bukit Tongkat B Estate consists of 4 female workers. However, needs of new mother was discussed during the Gender Committee/ KKD meeting conducted on 04/01/2021 such as time for breastfeeding and refrigerator to keep the breastmilk.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	FGV has established 'Menangani Aduan Melalui Jawatankuasa Wanita' with Doc. No.: ML-1A/L2-Pr14 dated 01/06/2016. The objective of the procedure is to establish a mechanism to handle sexual harassment, discrimination, violence cases reported in the area. Channel of complaint lodge has outlined in the procedure such as verbal and written. The appointed committee need to forward the complaint to Regional Gender Committee within 1 week from the date of complain received. If the case is unresolved, the committee will forward the case to <i>Talian Nur (Kementerian Pembangunan Wanita, Keluarga &amp; Masyarakat)</i> through 15999. The management will protect the identity of the complainant if they wish not to reveal. The procedure was briefed to the female workers during Gender Committee/ KKD meeting conducted on 04/01/2021 in Bukit Tongkat B Estate. Interviewed with the female workers confirmed that they are aware of the complaint procedure and informed that there is no case of sexual harassment and violence reported. Reviewed the Complaint Book for Gender Committee in Bukit Tongkat B Estate found no issue has been reported since last audit.	Complied

**Criterion 6.6:** No forms of forced or trafficked labour are used.

<p>6.6.1</p>	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>FGV will bare all recruitment fees such as medical, transportation from airport to Malaysia, visa as stated in the Communications Pack which will briefed to the candidates during pre-employment process in home country and agreement with the agent in source country; Workers have signed agreement in home country where the terms and conditions are identical without any contract substitution; overtime is based on request of workers and as per FGV's policy, developed Overtime Policy (Policy No.: FGV/GHC/POL/006, Rev. 4 dated 01/01/2020) to comply with the Employment Act 1955; there is no debt and wages withholding through interviewed with the workers; and workers can terminate the contract with 30 days of notice period without any penalty of termination. Interviewed with the foreign workers confirmed that they kept their passport in the safety box provided to them by the management or they kept in the cupboard inside their house. They also informed that overtime is based on voluntarily basis and they have freedom of movement by going to the town to purchase daily groceries.</p>	<p>Complied</p>
<p>6.6.2</p>	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>FGV Group has developed Guidelines and Procedures for Responsible Recruitment of Foreign Workers dated 27/06/2019. The guidelines are adopted the principles embedded in the Group Sustainability Policy including non-discrimination, respect for human rights and labour rights as well as health and safety. Workers will be signed on the contract of employment and that is non-transferable to other workers and cannot be substituted. The appointed recruitment agent in the source country shall bear all the costs during recruitment process. Workers will undergo orientation program and briefed on their rights, terms and conditions in the contract of employment and relevant labour and immigration laws. All necessities and accommodation will be provided to the workers in accordance with the legal requirements and standards to ensure</p>	<p>Complied</p>

		decent living conditions for workers. As to date, there was no new foreign workers employed by the estates since last audit.	
<b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;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><u>FGV Belitong POM</u></p> <ol style="list-style-type: none"> <li>1. The Mill Manager, Mr Md Aseri Bin Mohamad has been appointed as the OSH Chairman, as per appointment letter (Doc Number: (8)4926/PWK/840B/1 dated 20/04/2021 undersigned by the General Manager (Zone 2), together with Employer and Employee representative based on their work units as members of the safety committee.</li> <li>2. Regular meetings were conducted every 3 months to discuss Health and Safety Issues. Sighted JKKP Meeting Minutes dated 25/10/2021 (03-2021), 10/05/2021 (02-2021).</li> </ol> <p><u>FSSB Ulu Belitong Estate</u></p> <ol style="list-style-type: none"> <li>1. The management have appointed Din Ibrahim as the Chairman for the Safety Committee as well as the safety committee members as stated in the appointment letter dated 02/01/2021 undersigned by the R&amp;D Division Head.</li> <li>2. Regular meetings were conducted every 3 months to discuss Health and Safety Issues. Sighted JKKP Meeting Minutes dated 24/09/2021 (03-2021) and 21/06/2021 (02-2021).</li> </ol> <p><u>FGVPM Bkt Tongkat B Estate</u></p> <ol style="list-style-type: none"> <li>1. The Estate Manager, En. Hadi Helmi Bin Che Hassan as the Chairman for the OSH Committee in the estate as per appointment letter dated 01/04/2019 (Doc Number: 38/9520/HSE/FGVPM/WM/2019) undersigned by the General</li> </ol>	Complied



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		<p>Manager (Mersing Zone). Appointment letters for all other committee members were available and verified during the assessment.</p> <p>2. Regular OSH Meetings with the OSH Committee members to address all OSH related issues in the estate. The OSH Meeting minutes were available and verified as conducted on 25/10/2021 (4-2021), 27/07/2020 (3-2021), 06/05/2021 (2-2020) and 25/02/2021 (1-2021).</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p><u>FGV Belitong POM</u></p> <p>1. Accident and emergency procedures were available and sighted at the Mill Office and the Mill Compound. There is a formation of ERP Team for Rescue, Management and Extinguishment. The ERP Team was appointed, and the organizational chart was displayed at the notice board together with the emergency contacts. Fire Drill Training was conducted on 18/11/2021 for all workers.</p> <p>2. Workers trained in first aid were present in the mill at specific locations. Interview with the first aid box holders indicated that they were aware and trained on the usage of the first aid items. Inspection of the first aid box indicated all items were available as per the list and regular monitoring were done by the management to ensure the supplies were frequently replenished. Training for all first aid kit holders were conducted on 18/11/2021.</p> <p>3. There were 2 accident case reported for the year 2020. The JKKP 8 form has been submitted to JKKP. For the year 2021 there were 1 accident reported for the year. The JKKP 6 Form has been submitted to DOSH. The accident investigation has been done and the workers involved retrained based on the revised HIRADC.</p>	Complied

		<p><u>FGVPM Ulu Belitong Estate</u></p> <ol style="list-style-type: none"> <li>1. Accident and emergency procedures were available and sighted at the Estate Office and Stores. There is a formation of ERP Team emergency incidences that could occur in the estate. The ERP Team was appointed, and the organizational chart was displayed at the notice board together with the emergency contacts. ERP training was conducted on 18/10/2021</li> <li>2. Workers trained in first aid were present in the mill at specific locations. There were 3 trained first aiders in the estate. Sighted the certificate for the first aiders trained by Certified Emergency Response Training Academy on 21 &amp; 22/02/2019 with the certificate valid till 21/02/2022. Interview with the first aid box holders indicated that they were aware and trained on the usage of the first aid items. Inspection of the first aid box indicated all items were available as per the list and regular monitoring were done by the management to ensure the supplies were frequently replenished.</li> <li>3. There were no accidents or incidents reported for the year 2020 in the estate. The JKPP 8 form have been submitted to JKPP for the year ending 2020 on 08/01/2021 with the form available for verification. As for 2021 there were no accidents reported as well as of to date.</li> </ol> <p><u>FGVPM Bkt Tongkat Estate</u></p> <ol style="list-style-type: none"> <li>1. Emergency Response Plans were available in the estate to effectively handle and manage incidences such as fire, spillage and flood. The ERP Plans were available in the notice boards at the office and stores, sighted during the visit. Interview with the store clerk and mandores indicated that they were aware</li> </ol>	
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		<p>on the ERP procedures. Fire extinguishers were available at the office, stores and workers housing. Monthly monitoring of fire extinguishers was conducted by the management to monitor the pressure and expiry date of the extinguishers. Fire Extinguisher Training was conducted on 03/03/2021 for all staffs and workers. There is a formation of Emergency Response Team in the estate to attend to incidences such as fire in the estate.</p> <p>2. First aid kits were available in the office and stores together with the mandores of the operations such as harvesting and spraying as verified during site visit. Interview with the mandores indicate they were well trained on the techniques on first aid kit usage. First aid trainings were conducted for staffs and mandores on 05/04/2021.</p> <p>There were no accidents reported in the estate for the year 2020. The JKKP 8 form was verified with no report of accidents or incidences. The form has been submitted to DOSH on 18/10/2021 accordingly. For the year 2021. There were 1 accident reported as of to date involving harvesting work.</p>	
6.7.3	<p><b>(C)</b> 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 were provided with appropriate PPE where the cost is covered by the management. Interviews conducted during the site visit at the mill and estate showed the understanding from the workers that:</p> <ul style="list-style-type: none"> <li>• The management absorbs the cost of all PPEs and the workers are entitled to work-appropriate PPEs.</li> <li>• The importance of using appropriate PPE at all times during work.</li> <li>• Proper storage and disposal methods of PPE.</li> </ul>	Complied

		<p>The importance of using the sanitation area to wash the PPE and themselves prior to returning home.</p>							
<p>6.7.4</p>	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p><u>FGVPISB Belitong POM</u></p> <p>All workers were provided with medical care in the mill. Workers are all covered by SOCSO. Monthly SOCSO deductions were sighted in the worker’s payslips and the monthly contribution to SOCSO was verified. The latest SOCSO contribution for FGV Belitong POM and supplying estates was available for verification.</p> <p><u>FGVPM Ulu Belitong Estate</u></p> <p>Verified the SOCSO contribution for FSSB Ulu Belitong Estate for the month of September 2021; Acknowledgement Contribution Received (ACR) Date: 09/10/2021; Code: F7301001682A.</p> <p><u>FGVPM Bkt Tongkat Estate</u></p> <p>As stated in the contract agreement between the workers, they are provided with medical care born by the management for occupational injuries. Whereas for non-occupational injuries, the management is allowed to deduct from the workers’ wages if the medical cost is more than the subsidised amount provided by the management which is RM 200.00 per person every year. Verified the JKPP Permit for wages deduction (Reference Number: (22) dlm BHG. PU/9/129 Jld 23 dated 26/04/2016). The management contributes SOCSO for all workers in the estate. Verified the SOCSO contribution for FGVPM Bkt Tongkat B Estate as below:</p> <table border="1" data-bbox="1137 1252 1939 1351"> <thead> <tr> <th>Month</th> <th>Total Workers</th> <th>Contribution</th> </tr> </thead> <tbody> <tr> <td>August 2021</td> <td>64</td> <td>RM 1, 728.50</td> </tr> </tbody> </table>	Month	Total Workers	Contribution	August 2021	64	RM 1, 728.50	<p>Complied</p>
Month	Total Workers	Contribution							
August 2021	64	RM 1, 728.50							

		September 2021	61	RM 1, 529.50			
		October 2021	61	RM 1, 424.90			
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Occupational Injuries were recorded as below:			Complied		
		Operating Unit	2020	2021			
			Cases	Days		Cases	Days
		FGV Belitong POM	2	78		1	14
		FSSB Ulu Belitong Estate	0	0		0	0
		Bkt Tongkat B Estate	0	0	1	2	
<b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b>							
<b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.							
7.1.1	<b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	FGVPM Bkt Tongkat B Estate IPM plan was available in the document "Integrated Pest Management Plan 2020". The plan recorded the objectives of the plan which includes: 1. To control the population of pest below 5% pest damage on crops. 2. Action plans and integrated controls in managing pest. 3. Prioritise biological controls to reduce the use of chemicals. 4. Conduct census to identify target areas to increase effectiveness. 5. Conduct training on proper control of pest. FGVASSB Ulu Belitong Estate			Complied		

		<p>IPM plan was available and implemented in the estate. The IPM Management Plan was verified which included:</p> <ol style="list-style-type: none"> <li>1. To control the pest damage at below 5%.</li> <li>2. To plan and implement IPM methods to control pest.</li> <li>3. Priorities biological control to reduce the use of chemicals.</li> <li>4. Conduct census to identify targeted areas to increase effectiveness.</li> <li>5. Provide correct and accurate training in managing pest in the estate.</li> </ol> <p>For the implementation, verified the record of monitoring of barn owl box occupancy in Ulu Belitong estate. As per record there are 14 barn owl box in estate and as per management plan to add up another 6 barn owl box in estate.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>The estates conducted assessment on list of species invasiveness used for biological control. No invasive species listed in the CABI.org introduced in the estate.</p> <p>Flora species were used for IPM such as Tunera subulata, Cassia cobanensis and Antigonan leptopus.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>No evidence and records of fire usage for pest control at all three estates visited.</p>	Complied
<p><b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p>	<p>Justification for all pesticide available under Manual Lestari 1A, under Document: ML- 1A/L3-GP1(0) dated March 2012. In this, justification all chemical such as Pesticide, Herbicide and Fungicides</p>	Complied

	- Critical (Major) compliance -	are available for each chemical. This included glyphosate isopropylamine, metsulfuron methyl, trichlopyr butoxy ethyl ester and others.													
7.2.2	<p><b>(C)</b> 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 used and a.i per Ha is monitored on a monthly basis in the yearly Pesticide Records for Jan 2021 till Nov 2021 (Todate). The records were sampled and available for verification as below:</p> <table border="1"> <thead> <tr> <th>Type of Chemical</th> <th>Bukit Tongkat B</th> <th>Ulu belitong</th> </tr> </thead> <tbody> <tr> <td>Glyphosate isopropylamine</td> <td>0.528</td> <td>0.464</td> </tr> <tr> <td>Metsulfuron methyl</td> <td>0.025</td> <td>0</td> </tr> <tr> <td>Triclopyr butoxy ethyl ester</td> <td>0.126</td> <td>0.059</td> </tr> </tbody> </table>	Type of Chemical	Bukit Tongkat B	Ulu belitong	Glyphosate isopropylamine	0.528	0.464	Metsulfuron methyl	0.025	0	Triclopyr butoxy ethyl ester	0.126	0.059	Complied
Type of Chemical	Bukit Tongkat B	Ulu belitong													
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7.2.3	<p><b>(C)</b> 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 estates have implemented an Integrated Pest Management Plan and a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p> <p>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.</p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead.</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>	There is no prophylactic use of pesticides in all estates visited.	Complied												
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and	Sighted in the Chemical Registers showed that only class II, III & IV pesticides were used at the mill and estate. During the site visit	Complied												

	<p>paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> <li>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> </ul> <p>- Minor compliance -</p>	<p>to the chemical stores it was justified that there were only class II, III and IV chemicals being used. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead.</p>												
7.2.6	<p><b>(C)</b> 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. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers in the estates.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p> <table border="1" data-bbox="1137 1145 1930 1375"> <thead> <tr> <th>Estate</th> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Belitong Estate</td> <td>Spraying Training</td> <td>17/07/2021</td> </tr> <tr> <td>Chemical Premixing &amp; PPE Training</td> <td>16/07/2021</td> </tr> <tr> <td>Bkt Tongkat B Estate</td> <td>Spraying Training</td> <td>10/02/2021</td> </tr> </tbody> </table>	Estate	Training	Date	Belitong Estate	Spraying Training	17/07/2021	Chemical Premixing & PPE Training	16/07/2021	Bkt Tongkat B Estate	Spraying Training	10/02/2021	Complied
Estate	Training	Date												
Belitong Estate	Spraying Training	17/07/2021												
	Chemical Premixing & PPE Training	16/07/2021												
Bkt Tongkat B Estate	Spraying Training	10/02/2021												



7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.          - Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required 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.          - Minor compliance -</p>	<p>Pesticide containers are reused as premixed chemical containers and the excess are disposed through recycle wastes vendors after triple-rinsed procedure has been undergone.           Latest disposal by Ulu Belitong estate record, disposed at SS Setia Teknologi Enterprise (resit no: 1988) dated 26/10/2021 with total 28 pieces of 20 litre empty container.</p>	Complied
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.          - Critical (Major) compliance -</p>	<p>No aerial spraying for pesticide were done in FGVASSB Belitong Estate and FGVPM Bkt Tongkat Estate.</p>	Complied
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.          - Critical (Major) compliance -</p>	<p><u>FGVPM Ulu Belitong Estate</u>          The medical surveillance was conducted for 1 worker exposed to hazardous chemicals in the estate on 30/12/2020 by Dr. Halim Bin Ishak (HQ/08/DOC/00/387) @ Klinik Sulaiman. The cholinesterase test results indicated that the worker had no chemical contamination to himself and was fit to work.</p>	Complied

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		<p><u>FGVPM Bkt Tongkat Estate</u></p> <p>The medical surveillance was conducted for a total of 4 workers on 25.12.2020. The medical surveillance was conducted by Poliklinik Intan, Kluang. The report indicated that there were no clinical evidence of occupational related illness among the workers.</p>	
7.2.11	<p><b>(C)</b> 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>Pesticide handlers and sprayers in the estates were noted to be men only. It was verified from records, field inspections and interviews that no pregnant or breast-feeding woman had been offered work as pesticide operator.</p>	Complied
<p><b>Criterion 7.3:</b> 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 types of wastes were generally identified through the evaluation of environmental aspect and impact as mentioned in Indicator 3.4.2. Thereafter, documented in "Pelan Pengurusan Sisa Domestik dan Bahan Buangan" (Management Plan for Domestic Wastes and Waste Products) form. The form has the information about:</p> <ul style="list-style-type: none"> <li>Type of wastes – e.g. fertilizer bags, plastic, glass, iron, paper, used PPE, HDPE containers, organic wastes, POME, EFB, shell, fibre, used oil, used oil filter</li> <li>Method of disposal – generally to reduce, reuse and recycle</li> </ul> <p>Apart from that, there is also a procedure entitled "Pelupusan Sisa Domestik" (Domestic Wastes Disposal) [FGV/ML-1A/L2-Pr23, issue 1, rev. 0, 1/6/2016] and "Garis Panduan Pembinaan Lubang Sampah" (Guideline for Landfill Preparation" (ML-1A/L3-GP2(0), rev. 0, 1/6/2016) used as guidance to avoid or reduce pollution.</p>	Non-compliance

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		<p>Based on site visit at the landfill at the estates, it was observed that the rubbish pits were located far from residential area and natural waterway.</p> <p>Sighted waste such as Spent N-Hexane in lab was not identified as scheduled waste in waste management plan dated Jan 2021. No record of Spent N-hexane in scheduled waste inventory as per verification. During interview with lab operator, they stated that the Spent N-Hexane has been collected and disposed at the effluent pond. Thus a Minor NC is raised.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>In Ulu Belitong estate, latest disposal by Ulu Belitong estate record, disposed at SS Setia Teknologi Enterprise (resit no: 1988) dated 26/10/2021 with total 28 pieces of 20 litre empty container. Training on waste 23/9/2021.</p> <p>As per letter (BB)91/110/619/161 dated 9/8/2016 Ulu Belitong estate has permission from DOE to transport Scheduled waste and used Pusat Penyelidikan Pertanian Tun Razak (PPPTR) as centralized Scheduled waste store dated 29/7/2021.</p> <p>For Belitong POM, verification been conducted as per interview with workers and documentation review. As per the disposal records, record of disposal was available, the consignment note 20210901171SDW2L dated 11/8/2021 for SW 409 with total 0.05mt. Another Consignment note verification for 2021090117FVWKID dated 11/8/2021 for SW 306 with total 0.412 mt. No issue sighted during verification on sampling.</p>	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>There was no use of fire for disposal of wastes observed in the operating unit.</p>	Complied
<p><b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			

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 -	Management of soil fertility is guided by FGV's " <i>Manual Ladang Sawit Lestar</i> " (Oil Palm Plantation Sustainability Manual), Third Edition (2017), Section V: Manuring. It covers the applications of fertiliser for various stages of palm age and techniques. Recommendation of type of fertilisers and dosage is given by the agronomy unit through analysis of foliar and soil.	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 -	Leaf and soil analysis were done on 29/07/2021 (Ulu Belitong) and 22/03/2021 (Bukit Tongkat B Estate) to monitor the changes in soil fertility and plant health as well as to generate the Manuring Recommendation 2021.	Complied
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	Application of EFB was in place as part of the nutrient recycling strategy. Records of mulching was recorded in "Penaburan Tandan Kosong Ladang Sawit Ulu Belitong" (EFB Application at Ulu Belitong Estate) where information such as quantity of EFB and Field number is available. As per record of implementation in Ulu Belitong Estate for year 2021, the record of efb application showed total was 208.26 mt for empty fruit bunch.	Complied
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Straight, compound and mix fertilizer are used at the estates. Progress of fertilizer application is recorded in "Buku Rekod Kerja Penaburan Baja" (Manuring Records Book). Based on sampled records, the progress of manuring was in line with the programme. The total fertiliser to be applied recommended by the agronomist was around 9 kg/palm/year.	Complied
<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.			
7.5.1	<b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	<u>Ulu Belitong</u> Maps indicating the types of soil and steep terrain were available for verification. The maps were produced by FGV's Geoinformatics	Complied

		<p>FGV R&amp;D PPP, Tun Razak. Among the major soils identified to be present in the estate are Tai Tak, Lating and Renggam series to name a few. Based on terrain maps, there is no slope more than 25 degree in the estate.</p> <p><u>Bukit Tongkat</u>            Maps indicating the types of soil and steep terrain were available for verification. The maps were produced by FGV's Land Management Unit (LMU). Among the major soils identified to be present in the estate are Renggam and L/Alluvium series to name a few. Based on terrain maps, there is no slope more than 25 degree in the estate.</p>	
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>There is no replanting done by the sampled estates since the last assessment. Replanting is planned to be carried out in 2023 for Bukit Tongkat respectively.</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>No new planting within the sampled estates since 15 Nov 2019.</p>	Complied
<p><b>Criterion 7.6:</b> 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.</p>			
7.6.1	<p><b>(C)</b> 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.</p> <p>- Critical (Major) compliance -</p>	<p>Soil maps were available at the sampled estates. Based on the maps, 100% of the soil at the estate is of mineral type. There is no soil categorized as fragile or marginal.</p>	Complied

7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Not applicable as there are no marginal or fragile soils within the estate as indicated in the soil map.	Not Applicable
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Not applicable as there are no marginal or fragile soils within the estate as indicated in the soil map.	Not Applicable
<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	Not applicable as there is no planting on peat soil within the estates. Maps indicating the types of soil and steep terrain were available for verification. The maps were produced by FGV's Land Management Unit (LMU). Among the major soils identified to be present in the estate are Renggam and L/Alluvium series to name a few.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. <b>PROCEDURAL NOTE:</b> 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 -	Not applicable as there is no planting on peat soil within the estates.	Not Applicable
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Not applicable as there is no planting on peat soil within the estates.	Not Applicable
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place. - Critical (Major) compliance -	Not applicable as there is no planting on peat soil within the estates.	Not Applicable

7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	Not applicable as there is no planting on peat soil within the estates.	Not Applicable
7.7.6	<p><b>(C)</b> 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>	Not applicable as there is no planting on peat soil within the estates.	Not Applicable
7.7.7	<p><b>(C)</b> 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 as there is no planting on peat soil within the estates.	Not Applicable

**Criterion 7.8:** Practices maintain the quality and availability of surface and groundwater.

<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>At the Ulu Belitong estates, the plans were documented in "Pelan Pengurusan Air Tahun 2021". The objectives were mainly focusing on river (Sembrong and Penggeli) water quality. Among the plans established were:</p> <ul style="list-style-type: none"> <li>• Desilting field drainage</li> <li>• Restriction of chemical application within the riparian zone</li> <li>• Conservation of buffer zone</li> <li>• Preventing EFB mulching close to water ways</li> <li>• Construction of silt pits in the field</li> <li>• Maintaining good piping lines of water supply</li> </ul> <p>The quality of incoming and outgoing river water crossing the estates was analyzed once a year by the estates. Among the parameters tested were pH, BOD, COD, TSS, AN and DO. The latest river analysis was on 28/10/2021 by FGV Agri Services Sdn Bhd. From the result as per below:-</p> <table border="1" data-bbox="1137 959 1930 1182"> <thead> <tr> <th>Item</th> <th>DO, mg/l</th> <th>BOD, mg/l</th> <th>COD, mg/l</th> <th>TSS, mg/l</th> <th>CLASS</th> </tr> </thead> <tbody> <tr> <td>Sg Sembrong</td> <td>6.47</td> <td>1</td> <td>2</td> <td>14</td> <td>II</td> </tr> <tr> <td></td> <td>6.46</td> <td>1</td> <td>9</td> <td>19</td> <td>II</td> </tr> </tbody> </table> <p>Water supply for workers quaters is obtained from the public domain (Syarikat Air Johor).</p>	Item	DO, mg/l	BOD, mg/l	COD, mg/l	TSS, mg/l	CLASS	Sg Sembrong	6.47	1	2	14	II		6.46	1	9	19	II	<p>Complied</p>
Item	DO, mg/l	BOD, mg/l	COD, mg/l	TSS, mg/l	CLASS																
Sg Sembrong	6.47	1	2	14	II																
	6.46	1	9	19	II																
<p>7.8.2</p>	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO</p>	<p>Protection of water course is guided by its established procedure [Ref.: Pengenalpastian Kawasan Cerun dan Rizab Sungai [ML-</p>	<p>Complied</p>																		



	<p>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>1A/L2-Pr8(0), rev. 0, 1/6/2016)]. The other procedure 'Pengurusan Zon Penampam' review: 1.0 dated 23/1/2020. Based on the procedure, the width of buffer zones to be established are as follows:</p> <table border="1" data-bbox="1137 499 1930 799"> <thead> <tr> <th>River width</th> <th>Buffer zone area</th> </tr> </thead> <tbody> <tr> <td>&lt;5</td> <td>5</td> </tr> <tr> <td>5-10</td> <td>10</td> </tr> <tr> <td>10-20</td> <td>20</td> </tr> <tr> <td>20-40</td> <td>40</td> </tr> <tr> <td>&gt;40</td> <td>50</td> </tr> </tbody> </table> <p>Scheduled 2: Guideline for River and Reserve, Jabatan Perparitan dan Saliran.</p>	River width	Buffer zone area	<5	5	5-10	10	10-20	20	20-40	40	>40	50	
River width	Buffer zone area														
<5	5														
5-10	10														
10-20	20														
20-40	40														
>40	50														
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The mill applies the biological system with anaerobic lagoon and equipped with bio-polishing plant for its treatment of effluent. The quality of discharged effluent was analyzed every month and the parameters are T, pH, BOD, COD, TS, SS, O&amp;G, AN and TN. Based on quarterly report to the DOE, generally the mill has complied with the regulated limit. Based on the past 12 months results, the highest BOD reading was 35 ppm while the lowest was 7 ppm.</p>	Complied												
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill has been monitoring its consumption of water on daily basis. Based on the daily records, the consumption is as follows:</p> <ul style="list-style-type: none"> <li>• 2019 : 1.37 mt/mt FFB</li> <li>• 2020 : 1.24 mt/mt FFB</li> </ul>	Complied												
<p><b>Criterion 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised</p>															

7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>The mill and estates consistently monitored their fossil fuel consumption and kept records in order to get the information about efficient consumption. The diesel consumption for all the operating units for Jan-Dec 2020, were available. The figures are as follows:</p> <p>Mill: 2.9 lt/mt FFB          Ulu Belitong: 0.70 lt/mt FFB          Bukit Tongkat B: 1.64 lt/mt FFB</p>	Complied
<p><b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
7.10.1	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Identification of significant pollutants and greenhouse gas (GHG) emissions has been done e.g. POME, diesel/fuel and fertilizer. Their usage has been recorded and documented at each of the operating units. The plan to reduce or minimise the GHG emission has been established and incorporated with its plan to prevent pollution. Among the action plans were:</p> <ul style="list-style-type: none"> <li>• To optimise the usage of diesel</li> <li>• To ensure efficiency of ETP by not processing FFB more than licensed limit</li> <li>• To conduct training to the employees on chemical handling</li> </ul> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was accurate.</p>	Complied
7.10.2	<p><b>(C)</b> 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>Not applicable since no new development by the certification unit.</p>	Not Applicable

	- Critical (Major) compliance -		
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Other significant pollutant identified is the smoke emission from boiler operation. The mill currently is using multi-stage dust cyclone to minimize the pollutant. Monitoring of quality is done through regular stack sampling and ambient air monitoring. Verification of the stack sampling reports shows that the mill complied with the regulated limit. The reference number of the reports are as follows:</p> <p>Stack Sampling</p> <p>Report ETD/KSB/SE/2021/05/21734 (Boiler No.1) dated 24/5/2021. This stack assessment done by Spectrum Laboratories (Johore) Sdn Bhd. The result showed 21.86 mg/m3 @ 12%CO2.</p> <p>Report ETD/KSB/SE/2021/05/21734 (Boiler No.2) dated 24/5/2021. This stack assessment done by Spectrum Laboratories (Johore) Sdn Bhd. The result showed 14.27 mg/m3 @ 12%CO2.</p>	Complied
<b>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</b>			
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no new planting nor replanting activity in the sampled estates.	Not Applicable
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>	Apart from having zero burning policy at corporate level, contractors who are engaged to carry out preparation of land for replanting are also required not to use fire throughout the task through enforceable contract agreement. Nonetheless, there is no replanting activity at the visited estates. The latest record of management to consult with stakeholder was on 1/11/2021.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Adjacent stakeholders were approached through stakeholder consultation meeting and given information about zero burning policy.	Complied

	- Minor compliance -		
<b>Criterion 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<p><b>(C)</b> 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>	Not applicable since there is no land clearing after November 2005.	Not Applicable
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b>          Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>Assessment on HCV was conducted by the FGVASSB’s Sustainability Department in 2012 and the report is dated 17/9/2012. Another assessment on biodiversity was conducted internally for the estates (25/1/2018 for Ulu Belitong and 24/01/2018 for Bukit Tongkat) by FGVHB’s SCC Dept.</p> <p>Based on the reports, at Ulu Belitong and Bukit Tongkat, there was no area identified as HCV. Nonetheless, the estates maintained their riparian zones at the main revers i.e. Sungai Sembrong (Ulu Belitong) and Sungai Penggeli (Bukit Tongkat B). Among the wildlife identified and reported in the HCV assessment within the estates were monitor lizards, wild boar, squirrels and cobra.</p> <p>Nonetheless, since Bukit Tongkat estate is located adjacent next to FR Kluang, encroachment of wildlife such as tapir, tiger and elephant were occasionally observed based on report log book entitled “Kehadiran Haiwan Liar di Ladang Felda Bukit Tongkat B”.</p>	Complied
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable	Not Applicable
7.12.4	<b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or	Not applicable since no new development after 15/11/2018.	Not Applicable

	<p>enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>		
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	NA since no new development after 15/11/2018.	Not Applicable
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>Based on the report mentioned in Indicator 7.12.2, there is no HCV presence at the mill and supply bases. Nonetheless, employees are educated through morning briefing and signage about the restriction of hunting wildlife. Based on interview with employees, they have good understanding on RTE and the possible legal action that can be charge on them should they found to capture, harm, collect, trade, possess or kill the RTE species. The latest training conducted on 4/3/2020 by management. Monitoring conducted by management and recorded under ` Kehadiran Haiwan Liar Di ladangFelda Bukit Tongkat B'. Farom the record latest monitoring was on 3/7/2021.</p>	Complied

7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	Not applicable since no new development after 15/11/2018.	Not Applicable
7.12.8	<p><b>(C)</b> 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>	Not applicable since there is no land clearing after November 2005.	Not Applicable

## Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for **FGV Belitong** and supply base was calculated using the PalmGHG Calculator version 4. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill 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 **2021** for **FGV Belitong** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.96
PKO	0

Extraction	%
OER	19.71
KER	5.21

Production	t/yr
FFB Process	252,200.00
CPO Produced	49710.4
PKO Produced	13147.66

Land Use	Ha
OP Planted Area	1097.12
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	19.95
<b>Total</b>	<b>1117.07</b>

### Summary of Field Emission and Sink

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	10835.85	0.51	0.00	0.00	0.00	0.00	10835.85	0.51
CO <sub>2</sub> Emission from fertilizer	388.11	0.02	0.00	0.00	0.00	0.00	388.11	0.02
NO <sub>2</sub> Emission	302.86	0.01	0.00	0.00	0.00	0.00	302.86	0.01
Fuel Consumption	47.75	0.00	0.00	0.00	0.00	0.00	47.75	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	-9186.75	-0.43	0.00	0.00	0.00	0.00	-9186.75	-0.43
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>2387.82</b>	<b>0.11</b>	<b>0.00</b>	<b>0.00</b>	<b>57256.20</b>	<b>0.00</b>	<b>59644.02</b>	<b>0.11</b>

\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	0.00	0.00
Fuel Consumption	570.28	0.00
Grid Electricity Utilization	85.17	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	655.45	0.00

**Summary of Kernel Crusher Emission and Credit (if applicable)**

Emissions	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	0.00

\*This mill has no kernel crusher operation.

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

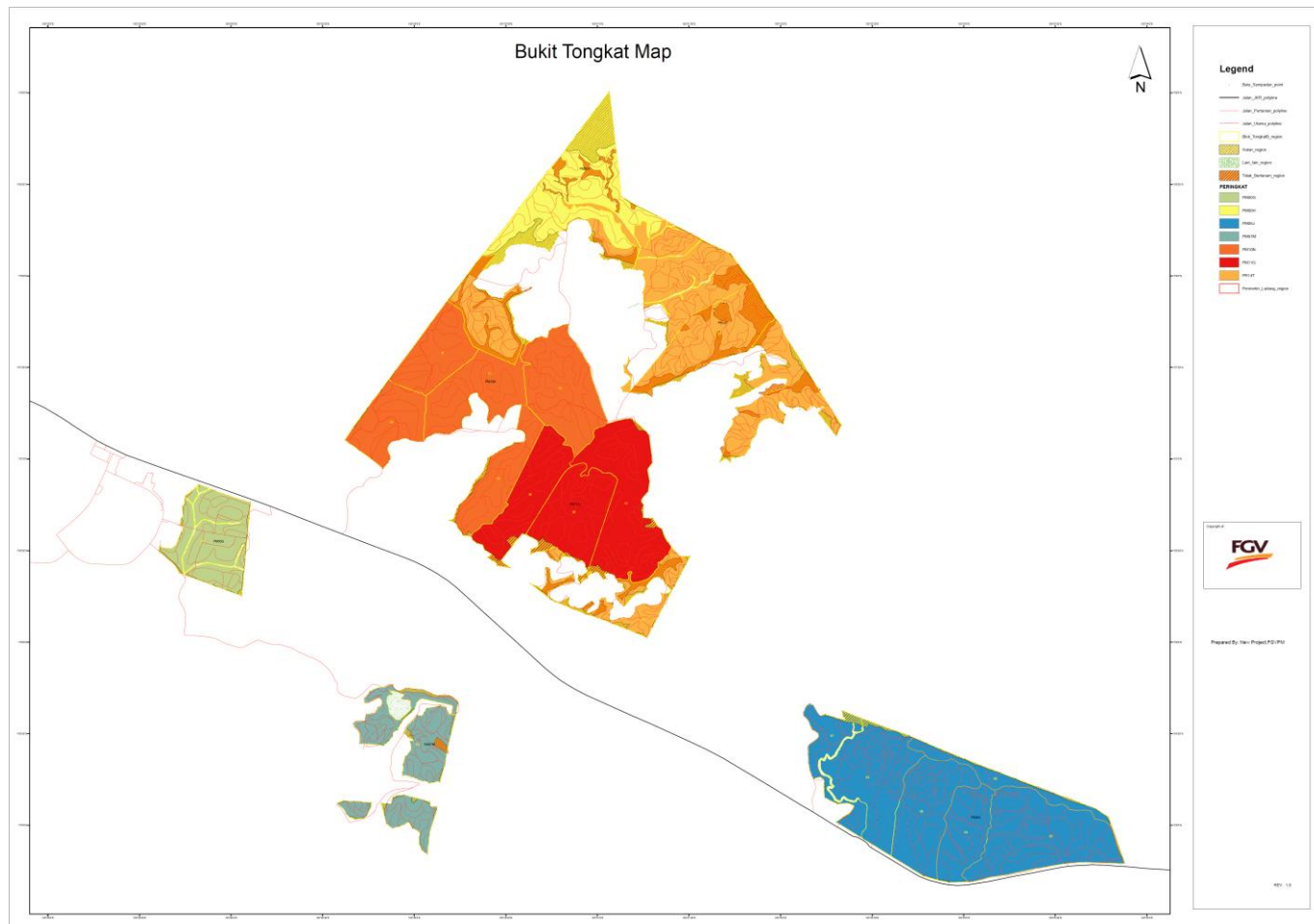
<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0



**Appendix C: Location Map of Certification Unit and Supply bases**

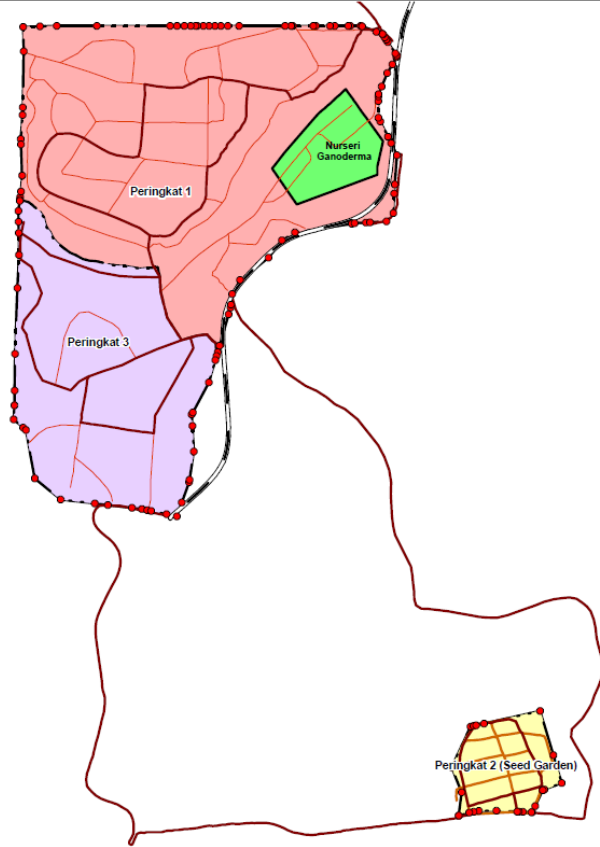


Appendix D: Bukit Tongkat B Estate Field Map



**Appendix E: Ulu Belitong Estate Field Map**

**LADANG FGV AS ULU BELITONG**



N

Skala 1 cm : 158 m

**PETA KESELURUHAN  
FGV AS ULU BELITONG**

Petunjuk :

- Jalan Highway Baru
- Jalan Utama Ladang
- Jalan Ladang
- Sempadan Peringkat
- Nusery Ganoderma
- Batu Sempadan

Tarikh : 11 November 2019

Disediakan Oleh :

INFORMATICS(GEOINFORMATICS)  
 FGV R&D PPP TUN RAZAK  
 26400 BANDAR JENGA  
 PAHANG DARUL MAKMUR

Peta ini bukanlah kuasa bagi penentuan sempadan  
 (This Map is not an authority on Boundaries)  
 HAK CIPTA FGV R&D

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

**Appendix F: List of Smallholder Registered and sampled**

Not Applicable

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
	Nil								
<b>Total</b>									

## Appendix G: 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