

# **SGS RSPO PROGRAM**

(Associated Document)

GP 9405A	Doc. Number:
15 March 2016	Doc. Version date:
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# **RSPO PRINCIPLES & CRITERIA CERTIFICATION REPORT**

# **Public Summary Information**

	T				
Job Number:	MY04692				
Client:	Genting Plantations Berhad - Gentine Mewah Oil Mill	RSPO membership #	1-0086-06-000-00		
Country:	Malaysia	RSPO Registered Parent Company name:  Genting Plantation Berhad			
Scope:	Processing of RSPO certified FFB for the production of RSPO certified CPO and PK at Genting Mewah Oil Mill using the Mass Balance Supply Chain module				
Supply Chain Module:	Module E: CPO Mills- Mass Balance;				
Mill Capacity	45 tonne/hour	Number of Estate	1 (one)		
Contificate Name to a	COC DCDO/DC47 00000	Date of Issue:	21 June 2017		
Certificate Number:	SGS-RSPO/PC17-00008	Date of Expiry:	20 June 2022		
SGS Accreditation Code	RSPO-ACC-023	Date of accreditation:	5 <sup>th</sup> July 2016		
Contacts Job Description:	Senior Vice President – Plantations				
Name:	Mr Tan Cheng Huat				
Address:  Street and number: Town/City State/Country Zip/Postal code Country	Physical address: Mill Address Genting Mewah Oil Mill KM 20,Genting Mewah Rd, Off 75th KM Sandakan-Lahad Datu Rd, 90200 Kinabatangan, Sabah Malaysia	Postal address: 10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur Malaysia			
Tel:		- 1			
Cell Phone :	-				
Fax:	-				
Web Site Address:	http://www.gentingplantations.com/				
Email:	chenghuat.tan@genting.com				
	Malaysian National Interpretation 2014				
Standard:	RSPO Supply Chain Certification Standard dated 21 November 2014				
Date of last report update	21 June 2017				
Certified FFB Received by the Mill 2017	January:0         July:0           February: 0         August:0           March:0         September:0           April:0         October:0				

SGS services are rendered in accordance with the applicable SGS General Conditions of Service accessible at http://www.sgs.com/en/Terms-and-Conditions.aspx

	May:0 June:0	November:0 December:0	
Annual CSPO Tonnage produced 2017	0 (No claim for RSPO yet)		
Annual CSPK Tonnage produced 2017	0 (No claim for RSPO yet)		
Annual CSPO Tonnage Sold 2017	0 (No claim for RSPO yet)		
Annual CSPK Tonnage Sold 2017	0 (No claim for RSPO yet)		

**End of Public Summary** 

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# **BASIC EVALUATION INFORMATION**

MAIN EVALUATION				
Evaluation Dates: March 29 – 31 <sup>st</sup> , 2017				
Team Leader/Team:	1) James S H Ong			
	2) Abdullah Din			
	3) Dayang Suhanie Khalid			
Affiliate Project Manager:		Date:		
Report approved by:	Aryo Gustomo	Date:	21 June 2017	
Certification approved by:	Shashibhushan Jogani	Date:	21 June 2017	
Database logged by:	Eric Dael	Date:	21 June 2017	
	SURVEILLANCE 1			
Evaluation Dates:				
Team Leader/Team:				
Affiliate Project Manager:		Date:		
Report reviewed & approved by:		Date:		
Certification approved by:		Date:		
Database logged by:		Date:		
	SURVEILLANCE 2			
Evaluation Dates:				
Team Leader/Team:				
Affiliate Project Manager:		Date:		
Report reviewed & approved by:		Date:		
Certification approved by:		Date:		
Database logged by:		Date:		
	SURVEILLANCE 3			
Evaluation Dates:				
Team Leader/Team:				
Affiliate Project Manager:		Date:		
Report reviewed & approved by:		Date:		
Certification approved by:		Date:		
Database logged by:		Date:		
	SURVEILLANCE 4			
Evaluation Dates:				
Team Leader/Team:				
Affiliate Project Manager:		Date:		
Report reviewed & approved by:		Date:		
Certification approved by:		Date:		
Database logged by:		Date:		
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SGS services are rendered in accordance with the applicable SGS General Conditions of Service accessible at http://www.sgs.com/en/Terms-and-Conditions.aspx

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# LIST OF ABBREVIATION

Short Form	Meanings	
BHCV	Biodiversity and High Conservation Value	
CAR	Corrective Action Request	
CHRA	Chemical Health Risk Assessment	
СРО	Crude Palm Oil	
DID	Department of Drainage and Irrigation, Malaysia	
DOE	Department of Environment, Malaysia	
EFB	Empty Fruit Bunch	
EIA	Environment Impact Assessment	
EMS	Environmental Management System	
EQA	Environmental Quality Act	
ERT	Endangered, Rare and Threatened species	
ESA	Environmentally Sensitive Area	
FFA	Free Fatty Acids	
FFB	Fresh Fruit Bunches	
FR	Forest Reserve	
GMWE	Genting Mewah Estate	
GMOM	Genting Mewah Cil Mill	
GPB	Genting Niewan On Mill  Genting Plantations Berhad	
На	Hectare	
HCV		
HDPE	High Conservation Value	
	High Density Polyethylene	
IPM	Integrated Pest Management	
ISO	International Organisation for Standardisation	
IUCN	International Union for Conservation of Nature and Natural Resources	
JCC	Joint Consultative Committee	
JUPEM	Jabatan Ukur dan Pemetaan Malaysia (Department of Survey and Mapping Malaysia)	
K	Potassium	
kW	Kilowatt	
LUCA	Land Use Change Analysis	
M	Meter	
Mg	Magnesium	
Mm	Millimeter	
Mt	Metric ton	
MYNI	Malaysia National Interpretation	
N	Nitrogen	
NGO	Non Governmental Organisation	
OA	Orang Asli (Indigenous People)	
OER	Oil Extraction Rate	
OSH	Occupational Safety & Health	
Р	Phosphate	
P&C	Principles and Criteria	
PK	Palm Kernel	
POME	Palm Oil Mill Effluent	
PPE	Personal Protective Equipment	
PT	Pejabat Tanah (Coding for Pahang Land Office)	
SOP	Standard Operating Procedures	
Sdn Bhd	Sendirian Berhad (Private Limited)	
SEIA	Social and Environment Impact Assessment	
Sg	Sungai	
SGS	Societe Generale de Surveillance	
SOP	Standard Operating Procedures	
SPC	Senior Plantation Controller	
USECHH		
	Use and Standards of Exposure of Chemicals Hazardous to Health	
WHO	World Health Organisation	
yr	Year	

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#### 1. SCOPE OF CERTIFICATION ASSESSMENT

#### 1.1 National Interpretation Used

The operations of the mill and their supply based of FFB were assessed against the Roundtable on Sustainable Palm Oil (RSPO), Malaysian National Interpretation Task Force (MYNI-TF), National Interpretation of RSPO Principles and Criteria for Sustainable Palm Oil Production Endorsed by RSPO Board of Governors on 6 March 2015.

### 1.2 Certification Scope

The scope of certification includes the production of [Genting Mewah Oil Mill] and its supply base [Genting Mewah Estate] according to the RSPO standard requirement of Roundtable on Sustainable Palm Oil (RSPO), [Malaysian] National Interpretation of RSPO Principles and Criteria for Sustainable Palm Oil Production [2014] and RSPO Supply Chain Certification Standard dated 21 November 2014

### 1.3 Location and Maps

Genting Plantations Berhad - Genting Mewah Oil Mill is located in [Kinabatangan, Sabah, Malaysia] (Figure 1). More detailed information on the estates location and layouts is shown in Figures 2. The GPS locations of the mills are shown in Table 1.

**Table 1: Mill and Supply Base GPS Location** 

Mill/Supply Base (Estate/smallholder)	Latitude	Longitude	
Genting Mewah Oil Mill	5° 30' 59.0976'' N	117°42' 28.2024" E	
Genting Mewah Estate	5° 30' 13.5" N	117°43′ 2.0″ E	

**GMOM** SABAH CIPEANS CEUTRES STA

Figure 1: Location Map of Genting Mewah Oil Mill

GMWE Coordinate : 5.527266 N, 117.743358 E

Data Source : Field Survey Using Trimble/

Garmin/JUPEM

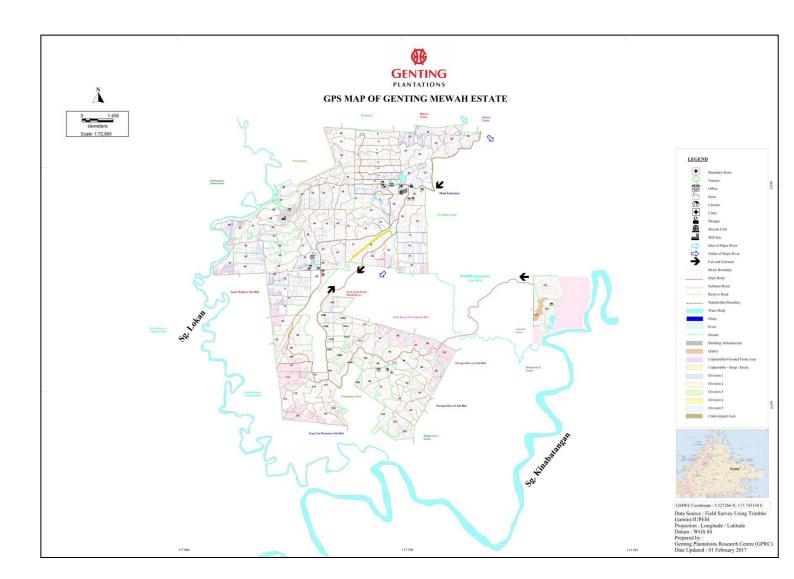
Projection: Longitude / Latitude

Datum: WGS 84 Prepared by:

Genting Plantations Research Centre (GPRC)
Date Updated: 01 February 2017

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Figure 2: Location Map of Estate Mewah Estates, its Division and GMOM



## 1.4 Description of Supply Base and Mill Processing Capacity

The FFB is sourced from [1] estate which is **Genting Mewah Estate** directly managed by **Genting Plantations Bhd**.

Genting Mewah Estate is divided into five divisions.

Due to the distance from the main division, the management have decided to internally assign Division 4 as Genting Lokan Estate since 2016. This is for better operational control and management of the area. In terms of legal requirements, all permits and licenses are still under Genting Mewah Estate.

The budgeted crop yields from the estate are listed in Table 2 below.

The projected OER rate for 2017 is [22.10%], See Table 3 below

Table 2: Projected FFB from Supply Base (FY 2017)

	FFB (Tonnage)		
Estates/Smallholders	Estimation	Actual (2017)	Projection (2017)
Genting Mewah Estate	0	0	90,805.00
Subtotal from own RSPO certified supply base claimed for certification	0	0	90,805.00
Certified FFB received from other RSPO certification scope within adjacent estates	0	0	0
Total volume claimed for certification	0	0	0
Grand Total	0	0	90,805.00

Table 3: Projected Mill Processing Data (FY2017)

	Mill Production Figures (MT) (Audited Estate)					
Mill Name	Estimation		Actual (2017)		Projection (2017)	
	СРО	PK	СРО	PK	СРО	PK
GMOM	0	0	0	0	20,068.00	4,903.00
	OER: %	KER: %	OER: %	KER: %	OER: %	KER: %
Extraction Rate	0 %	0 %	0 %	0 %	22.10%	5.40%

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#### 1.5 Area of Plantation

The areas of supplying estates for this operating unit are listed in Table 4. Details of planted area (mature/immature), total land area, conservation, HCV and others are also listed.

Table 4: Area Statement of the Supplying Estates

	Planted Area					Total Land /
Name of Estates	Immature Area (Ha)	Mature Area (Ha)	Conservation Area (Ha)	HCV Area (Ha)	Others use	Lease Area (Ha)
GENTING MEWAH ESTATE	445.44	4,529.99	25.00	240.05	340.29	5,580.77
Total	445.44	4,529.99	25.00	240.05	340.29	5,580.77

### 1.6 Date of Planting and Cycle

The [Genting Plantations Berhad - Genting Mewah Oil Mill] own estates were planted between prior to Nov 2005 and they are in the process of replanting. A replanting program for all estates involved are available and being projected for the next five (5) financial years (FY 2017 - 2021). The age profiles for all the estates are simplified in Table 3 below.

Table 5: Planting Age Profiles for all Supply Base Estates

Name of supplying	Planting Age (Ha)			
estate	Immature	>4 - 14 years	>14 - 25 years	>25 years
GENTING MEWAH ESTATE	445.44	334.66	4,195.33	0
Total	445.44	334.66	4,195.33	0

#### 1.7 Other Certification Held

Genting Mewah Oil Mill and Genting Mewah Estate were certified with ISCC EU and ISCC PLUS in 2014 and has continued to maintain these certificate annually.

The mill and estate also have attained the industry standard certification which is the MPOB Codes of Good Agricultural Practices and Good Milling Practices.

Internally, Genting Mewah Estate was awarded with Model Estate Certificate in December 2016.

#### 1.8 Organizational Information and Contact Person

The company contact person details are as follows:

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Name:	Tan Cheng Huat
Designation:	Senior Vice President - Plantations
Address:	10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur
Contact No.:	-
Email address:	chenghuat.tan@genting.com

### 1.9 Time-bound Plan for Other Management Units

**Genting Plantations Bhd** is a member of RSPO and has been involved in the certification since 14/11/2006; the RSPO membership number is **1-0086-06-000-00**.

As of 31 Dec 2016, **Genting Plantations Bhd** owns and operates 10 mills (seven in Malaysia and another three in Indonesia, with a total milling capacity of 490 metric tonnes ('mt") of fresh fruit bunches ("FFB") processed per hour) and 31 oil palms estates, together with 15 operating units (one without mill) covering 64,850ha in Malaysia and some 194,850 ha in Indonesia.

**Genting Plantations Bhd** has developed a time-bound plan (**Appendix C**) for the phased implementation of the RSPO P&C, commencing with mills and estates. **Genting Plantations Bhd** will use the experience gained from achieving certification of the first few mills and estates to implement the RSPO P&C in parallel with the remainder of its operations. The PT SGS assessment team considers that **Genting Plantations Bhd** is on the right track which is reasonable and challenging, given the widespread geographic locations of its properties, the resources required and the numbers of smallholders involved.

**Genting Plantations Bhd** has also diversified into property development, biotechnology and the manufacturing of downstream palm-based products.

### Auditor Finding on the Time Bound Plan and Partial Certification

Time Bound Plan				
Requirement	Findings and any action required	Compliance (to be completed by auditor)		
Does the plan include all subsidiaries, estates and mills?	The time bound plan includes all operating units in Malaysia and Indonesia.	[Yes]		
	The full list of operating units in Malaysia and Indonesia and their timebound plan was also given to the auditors.			
	The full list of direct subsidiaries and indirect subsidiaries with more than 50% of ownership is also available in the company's annual report.			
	The annual report has the subsidiary companies who owns the individual estate and mills.			
	From the RSPO website, the latest submitted ACOP ( 2015 ) does not provide a listing of all the subsidiary as there is specific requirement to do so.			
	To note about the following:			
	PT GIL remains part of company land-bank but not likely to be developed.			

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Is the time bound plan	2) Genting Sepang Estate ( Sepang, Malaysia) – going to be developed into property development.  http://www.gentingplantations.com/wp-content/uploads/2017/03/GENP2016_AR.pdf  Refer to company's annual report for the subsidiary who owns all the estates and mills.	[Yes]
<ul> <li>challenging?</li> <li>Age of plantations.</li> <li>Location.</li> <li>POM development</li> <li>Infrastructure.</li> <li>Compliance with applicable law.</li> </ul>	The TBP is challenging especially for operating units in Indonesia. The current focus of the Indonesian management is to implement ISPO which is a mandatory requirement. Infrastructure and POM construction is still on-going. The company is also expanding the land areas with new acquisitions.	
Have there been any changes since the last audit? Are they justified?	The changes are due to new acquisitions and rescheduling by the management.  The TBP is revised whenever there is a new acquisition. Development of oil palm for the new concession is done in phases and the certification programme is implemented once the oil mill is being commissioned in the new area. (Unit for certification is oil mill and supply base).	[Yes]
If there have been changes, what circumstances have occurred?	Delays in certification of some POMs and estates.	[Yes]
Have there been any stakeholder comments?	To-date, no comments received from stakeholders on the TBP.	[Yes]
Have there been any newly acquired subsidiaries?	No new acquisitions were made in 2017.  The most recent acquisition was made in June 2016 for PT AAC and PT PALJ.  Refer to company's annual report 2016 ( Page 123) <a href="http://www.gentingplantations.com/wp-content/uploads/2017/03/GENP2016_AR.pdf">http://www.gentingplantations.com/wp-content/uploads/2017/03/GENP2016_AR.pdf</a>	[Yes]
Have there been any isolated lapses in implementation of the plan?	No lapses however re-scheduling of the certification dates has been made.	[Yes]

## **Un-Certified Units or Holdings**

**Note**: Companies may demonstrate compliance by clear evidence of a self-audit (i.e. an internal audit for all subsidiaries, estates and Palm Oil Mills)

Requirement	Findings and any action required	Compliance
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Yes  The Sustainability Department conducts internal audits prior to the external audits and findings are given to the management units for their further action.	[Yes]
	Monthly reporting by the Sustainability department to the senior management on the implementation of the sustainability requirements and compliance progress.	
No replacement after dates defined in NIs Criterion 7.3:	*as of the approval of the certification in June 2017 the following were updated:	Yes
<ul> <li>Primary forest.</li> <li>Any area identified as containing High Conservation Values (HCVs).</li> </ul>	Total 4 LUCA were submitted to RSPO Secretariat.  1)PT SISM – Remediation Concept Note was approved by the RSPO BHCV Panel in May	

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Any area required to maintain or enhance HCVs in accordance with RSPO	2017. The full Remediation Plan was submitted to the Panel in June 2017. Pending review and approval by the BHCV Panel.	
criterion 7.3.	2)PT GAL- Non commercial clearin, LUCA pending approval by Panel.	
	3)Genting Kencana Estate, Sabah – Total areas for compensation liability is 463.80 hectares. In progress to prepare the Remediation and Compensation Concept Note to be submitted to the BHCV Panel.	
	Genting Jambongan Estate, Sabah – LUCA pending approval by the Panel.	
Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	NPPs have been submitted for new plantings since Jan 2010. The latest NPP was published on RSPO website on 13 July 2016 for Genting Jambongan Estate in Sabah for an expansion of the estate areas.	Yes
	For the new acquisitions in 2016, all the assessments required for NPP has been completed.	
	The NPP documentation is in progress. The HCV assessment reports for PT AAC & PALJ are pending their submission for quality review by HCVRN.( in a queue)	
	No development in the newly acquired concessions until the NPP procedures are completed and approval obtained from RSPO.	
Any Land conflicts are being	No outstanding land conflicts.	[Yes]
resolved through a mutually agreed process, e.g. RSPO	No existing land conflict or legal issues.	
Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	The legal suit filed in the High Court of Sabah and Sarawak under Suit No.K22-245-2002 dated 11 October 2002 has reached an out-of-court settlement within the parties in the suit in March 2016.	
	http://www.gentingplantations.com/wp-content/uploads/2017/03/GENP2016 AR.pdf Page 122.	
Any Labor disputes are being	No existing labour issues.	[Yes]
resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	Based on GPB discussion and reference to the RSPO Complaints link http://www.rspo.org/members/complaints/status-of-complaints/view/36, no existing labour issues recorded.	
	The Sustainability team in Indonesia is closely monitoring to ensure no labour dispute issues.	
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Yes  The Sustainability Department conducts internal audits prior to the external audits and findings are given to the management units for their further action.	[Yes]
	Monthly reporting by the Sustainability department to the senior management on the implementation of the sustainability requirements and compliance progress.	
Any Legal non- compliance is	None	[Yes]
being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and	Based on GPB discussion and reference to the RSPO Complaints link	

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2.2.	http://www.rspo.org/members/complaints/status- of-complaints/view/36, no legal issues pending ( as of 2/6/17)	
	The Sustainability team in Indonesia is closely monitoring to ensure any legal issues are properly addressed	

#### 2. ASSESSMENT PROCESS

### 2.1 Certification Body

SGS is the world's leading inspection, verification, testing and certification company. SGS is recognized as the global benchmark for quality and integrity. With more than 80,000 employees, SGS operates a network of over 1,650 offices and laboratories around the world.

The RSPO Programme is the SGS Group's RSPO Certification Programme internationally accredited by the ASI to carry out oil palm plantation and supply chain certification for global RSPO certification.

### 2.2 Assessment Methodology, Programme, Site Visits

The assessment was conducted from 29/3/17-31/3/17 for 7 audit days and involving 1 estate and the mill, Genting Mewah Oil Mill of **Genting Plantations Bhd**. The audit covers documentation review, internal procedures, management system, field inspection as well as identification of any significant issues for both environment or social issues. A sample of stakeholders was consulted during the assessment to get their feedback on the management practices.

The assessment was conducted based on random samples and therefore nonconformities may exist which have not been identified. The methodology for objective evidence collection included physical site inspection, observation of tasks and processes, interview with workers, families and stakeholders, documentation review and monitoring data.

The assessment program is included as shown in **Table 6** below.

**Table 6: Assessment Program** 

Date	Time	Auditor	Organisational and Functional Units/ Processes and Activities	Key Contact
28/3/17	MH2710 KULSDK 1035 1320	JO,DSK and AD	Arrive Sandakan / Lunch	Mr Sivaji and Ms Gwen and Genting Mewah Group representative - Vijayam Manikam
				Vice President/General Manager – Processing (Sabah
		JO,DSK and AD	Stakeholder consultation	As above
			As some of the Sandakan-based stakeholders are not able to be available on 29 <sup>th</sup> March, they agreed	

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			to be consulted on the 28 <sup>th</sup>	
			Overnight Sandakan and Dinner arrangement if required	
29/3/17	6:30 a.m		Breakfast and travel to Genting Mewah	
	8:00 a.m	JO, AD, DSK	Arrival at Estate	As above
			Opening meeting @ Genting Mewah Estate Office  • Introduction to the audit by SGS	
			<ul> <li>Briefing by the SGS on the auditing approach</li> <li>Formulation of audit schedule</li> </ul>	
	8:45	JO	a) Principle 4: Use of Appropriate Best Practices by Growers and Millers  - Field Operation and visit  - Field Operations ( Spraying/ Harvesting/, Manuring, IPM), Good Agricultural Practices, Safety, replanting (if any) PPE, Interview field workers  - Slope management and riparian zone  - Boundary (e.g. Boundary with smallholder), OSH, Landfill, Line site domestic waste Storage Facilities	As above
			<ul> <li>Chemical</li> <li>Fertiliser</li> <li>Tripled rinsed empty container</li> <li>Shower area, Eyewash, pre-mix area, PPE drying area</li> </ul>	
		AD/DSK	a) Principle 1: Commitment to Transparency     b) Principle 2: Compliance with Applicable     Laws and Regulation     c) Environmental Responsibility and     Conservation of Natural Resources and     Biodiversity	
			- HCV-WWF , Conservation , Bufferzone area - Landfill , Line site domestic waste Storage Facilities	As above
			- POL - Workshop Waste Management (SW), Recycling and Domestic waste	
		DSK/AD	- POL - Workshop Waste Management (SW), Recycling and Domestic waste  Principle 6: Responsible Consideration of Employees and of Individuals and Communities Affected by Growers and Mills - Interview workers, contractor and their workers	
		DSK/AD	- POL - Workshop Waste Management (SW), Recycling and Domestic waste  Principle 6: Responsible Consideration of Employees and of Individuals and Communities Affected by Growers and Mills - Interview workers, contractor and their	As above
	1:00	DSK/AD	- POL - Workshop Waste Management (SW), Recycling and Domestic waste  Principle 6: Responsible Consideration of Employees and of Individuals and Communities Affected by Growers and Mills - Interview workers, contractor and their workers - Interview worker representatives, Union - Appointment with external stakeholders surrounding NLE Canteen	As above

1	<u> </u>	Intoniow	As above
		<ul> <li>Interview</li> <li>Amenities and Utilities ( water , electricity)</li> </ul>	AS ADUVE
		- Food purchase	
		- Domestic Waste	
	AD	Office documentation	
	AD	Document Review : EIA updates	
		- Legal and Maps - Licences	
		<ul><li>Records and Monitoring</li><li>EIA plan and review , Maps</li></ul>	
		- Edw plan and review , Maps - Education of workers on ERT and HCV	As above
		Waste management plan     Pollution Plan	
		<ul> <li>Waste records and disposal</li> </ul>	
		Fossil fuel use efficiency     GHG calculation	
		- Grid calculation	
	DSK	Interview stakeholders , Representatives , Gender	
		Document review	
		- SIA Assessment update , plans and records	
		<ul> <li>Records of meetings – worker meeting</li> </ul>	As above
		Stakeholder meetings and records of consultation	715 above
		- Policies, children and discrimination	
		<ul><li>Union &amp; contract</li><li>Pay slip and Deduction</li></ul>	
		<ul> <li>Employment and contract Records</li> </ul>	
		<ul><li>Legalization</li><li>Passport</li></ul>	
		<ul> <li>Contractor payment and contractor workers</li> <li>Minimum wage monitoring</li> </ul>	
		- Disputes, Complaints ,Grievances ,	
		Resolution and records - Sexual harassment	
		Principle 8: Commitment to Continual	
		Improvement in Key Areas of Activity	
	10		
	JO	Document Review	
		- Business management plan and replanting programme	
		- time-bound plan	
		- SOP monitoring and implementation mechanism	
		- Records – soil , fertiliser, water & IPM monitoring	
		-Records of pesticide and fertiliser usage	
		- Training records – IPM , Waste chemical handling	
		- Medical surveillance	As above
		- Safety policy & meetings	-
		-Safety training and Health Records	
		-LTA Records and Accident Insurance	
5:30		Interim Findings of estate	
		Discussion	All

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	6:00 p.m		End of Day 1 Audit, Travel back down to Sandakan	
	8:00 p.m		Dinner	
30/3/17	6:00 a.m		Breakfast and travel to Genting Mewah Oil Mill	
	8:00 a.m		Arrive Mill Audit trail planning	Mill Manager, mill personnel and Genting Sustainability Team
		AD, DSK, JO	Legal  Regulatory ( Licences ) Permits Payment to collector/ supplier Contract and Pricing Good Milling practices  Environment  EFB, POME GHG Monitoring Final Discharge Water Management Plan Waste water management e.g BOD Submission to DOE Waste management Water Treatment Electricity  Health & Safety PPE Training Mill records on production RE usage, water usage, Fossil fuel Monitoring Audiometric Test	As above
			Interview workers  - Pay - Night shift - Housing - Employment contract and agreement - Deduction - Minimum wage management - Interview with FFB Suppliers and collectors  Site visit – Mill reception , Process etc and Final	
			Discharge , Waste management EFB site	
			Lunch	
			Continue Document Review	
			- Interview with FFB Suppliers and collectors	
			Preliminary findings for Mill	
			i realitimary infultige for will	

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			1-2 auditors may stay overnight in Estate while the others can travel back to Sandakan  Dinner arrangement End Day 2 Audit	
31/3/17	6.00 a.m	AD/ JO /DSK	Breakfast and travel to Genting Mewah Oil Mill	
	8.00 a.m		RSPO Supply Chain Audit	
			<ul> <li>MB</li> <li>Explanation</li> <li>Documented Procedure</li> <li>Goods in Goods Out</li> <li>Palmtrace</li> <li>Record Keeping</li> </ul>	
	12:00		Closing meeting for GMOM and its supply base	
			Presentation of Findings GMOM and its supply base and recommendation  - Time-bound Plan ,Stakeholder,NPP, Complaints	
			Discussion	
	2:00 p.m		Auditor travel down to Sandakan	
	5:00 p.m		Auditors travel back	

## 2.3 Qualification of Lead Assessor and Assessment Team

PT SGS Indonesia holds copies of educational qualifications, certificates and audit logs for each of the audit team members. SGS has evaluated the qualifications and experience of each audit team member and has registered the following designations for conducting RSPO Assessment. Summary of auditors' educational background and experience are listed in Table 7 below.

**Table 7: Auditors Profile** 

Evaluation Team	Notes
Team Leader – Plantation ,Mill GAP, OSH & external stakeholder consultation	James S H Ong, a Bachelor of Agriculture Science holder and agronomist in SGS (M) Sdn Bhd. He has many years working experience in agriculture sector in Malaysia and has been working in estates as well in the agrochemical and fertilizer industry. He is well versed with Good Agricultural practices .He has undergone ISO 14001 and RSPO Lead Auditor and RSPO Supply Chain training and involved in a number of audits on oil palm plantations, supply chains and traders.
	He is also involved in ISCC audits.
Auditor 2 – Environment external	Abdullah Din, SGS (Malaysia) Sdn Bhd CoC Program Manager and Lead Auditor, is a forester by profession and a trained Lead Auditor with more than 8 years experience in forestry Chain of Custody (CoC) certification. He also

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stakeholder consultation, & Legal compliances	has been involved in a number of Forest Management (FM) certification for the last 3 years. In addition, he is a Lead Auditor for RSPO, trained by RSPO for auditing against RSPO P&C and RSPO Supply Chain and involved in a number of plantation assessments and audit of palm oil mill.  He is also involved in ISCC EU certification.
Auditor 3 – Social , internal and external Stakeholder consultation & Continuous Improvement	Dayang Suhanie Khalid has been graduated from Universiti Putra Malaysia in Bachelor of Forestry Science with major in recreational, social and services. She also has been involved in a number of Forest Management (FM) certification for last 3 years. She also has attended training on RSPO P&C Social and Labour Standards and Mechanism of Social Auditing in 2014. She has involved in RSPO assessment since 2013 in Malaysia and Indonesia. She has successfully completed ISO 9001:2008 Lead Auditor Course and RSPO Lead Auditor Course in 2013.
	She is also involved in COC certification for timber based products.

#### 2.4 Stakeholder Consultation and List of Stakeholders Contacted

Public Stakeholder Notification was made on 27/02/2017, 30 days prior to the recertification assessment. There were no written feedbacks received at the end of the 30 days period. Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone and email to arrange meetings at a location convenient to them to discuss **Genting Plantations Bhd** Certification Unit's environmental and social performance.

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, These included environmental interest groups, local government agencies and relevant authorities, social groups, and workers' unions etc. 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 with detail comments is included as **Appendix D**.

## 3. ASSESSMENT FINDINGS

#### 3.1 Summary of Findings

#### 3.1.1 Principles & Criteria

As outlined, objective evidence was obtained separately for each of the RSPO Indicators and criterion for the mills and estates. The results for each indicator from each of the operational areas were evaluated to provide an assessment of conformity. A statement is provided for each of the RSPO indicators in order to support the findings of the assessment team.

There were [0] Major Non-conformities and [02] Minor Non-conformities identified during this assessment. Some areas identified with potential areas for improvement has leaded into [09]

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Observations raised. Details for each Non-conformities and observations are given in **Appendix C**. Major Non-conformities has been closed out within the period of 90 days after the Main assessment. Minor Non-compliances and Observations will be followed up during the next Annual Surveillance Audit which is scheduled to be conducted within the period of twelve months after the Report approval of Main Assessment.

Principle 1	: Commitment to Transpare	ncy				
environme	Criterion 1.1: Growers and millers provide 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	information upon request	or infori SPO Crit	natio	d millers provide adequate n on (environmental, social and/or o relevant stakeholders for effective	Minor	
Findings	In compliance: Yes: X	No:				
Objective evidence:	The procedure namely "Procedure on Requests and Responses" (SMP-GPB-25) –updated 14/08/2014 is available that defines management responsibilities to respond constructively and promptly to the information requested by the stakeholders with sufficient objective evidence.					
	A list of stakeholder updated 26 Aug 2016 is available. The list includes contractor, transporters, government department & agencies and respective estate stakeholders.					
				eceived any request for information on (en rs relevant to RSPO Criteria.	vironmental,	
	The organization should established verification procedure and conduct verification of stakeholders to ensure that all stakeholders are covered in list of stakeholder.					
	OBSERVATION 01					
1.1.2	Records of requests for in	ormatio	n and	responses shall be maintained.	Major	
Findings	In compliance: Yes: X	No:				
Objective evidence:	The procedure entitled Procedures on Requests and Responses (SMP-GPB-25) dated 14 August 2014 is available to ensure constructive response to stakeholders.					
	As mentioned in 1.1.2, to date, there is no request for information on (environmental, social and/or legal) issues from stakeholders relevant to RSPO Criteria.					
	The Social Officer is the appointed personnel for updating and respond to the request Record of request (if any) will be maintained in Enquiry Register Book.					
commercia	Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.					
1.2.1 (a)	Land titles / user rights (C	2.2)			Major	
Findings	In compliance: Yes: X	No:				
Objective evidence:	Land titles of estate and mill are available. These documents will be made available to all interested parties upon request.					
1.2.1 (b)	Occupational health and safety plans (Criterion 4.7);  Major					
Findings	In compliance: Yes: X	No:				
Objective evidence:	Safety and Health Policy dat	ed 1 July	2015	and Safety and Health Plan 2015 are ava	ilable.	
evidence.	Both policy and plan are mad office.	de public	ly ava	ilable by clearly displaying at both estate a	and mill's	
1.2.1 (c)			ating	to environmental and social impacts	Major	
	(Criteria 5.1, 6.1, 7.1 and 7.	8);	<b>,</b>			
Findings	In compliance: Yes: X	No:				

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Objective evidence:	Updated Environmental Improvement & Management Plan and Social Impact Assessment (SIA) are available. These documents will be made available to all interested parties upon request.					
1.2.1(d)	HCV documentation summary (Criteria 5.2 and 7.3);  Major					
Findings	In compliance: Yes: X No:	1				
Objective evidence:	The HCV report entitle "Inventory on HCV sites within Genting Plantations Berhad G Estates (Sabah Region 1)" is available	roup of				
1.2.1 (e)	Pollution prevention and reduction plans (Criterion 5.6);	Major				
Findings	In compliance: Yes: X No:					
Objective evidence:	Pollution Prevention Plan for GMWE and GMOM are made available during onsite audit. It covered the pollution source, specific concerns, mitigation plan, data required and monitoring & action plan.					
1.2.1 (f)	Details of complaints and grievances (Criterion 6.3);	Major				
Findings	In compliance: Yes: X No:					
Objective evidence:	A procedure for Complaints and Grievances (SMP-GBP-19) was sighted in office of the estate and mill.					
1.2.1 (g)	Negotiation procedures (Criterion 6.4);	Major				
Findings	In compliance: Yes: X No:					
Objective evidence:	A system to resolve land disputes is documented "Negotiation, Compensation and Handling Procedure" (SMP-GBP-18) reviewed on 5 <sup>th</sup> September 2014 is available.					
1.2.1 (h)	Continual improvement plans (Criterion 8.1);  Major					
Findings	In compliance: Yes: X No:	1				
Objective evidence:	The continual improvement plans is available. The plan includes :					
evidence.	a. Minimize use of pesticide					
	b. Environmental impacts					
	c. Waste reduction					
	d. Pollution and greenhouse gas emissions					
	e. Social Impacts  f. Encourage optimizing the yield of the supply base					
	g. Worker personal file					
	h. Water consumption and water quality					
	i. Health and safety performance					
1.2.1 (i)	Public summary of certification assessment report;	Major				
Findings	In compliance: Yes: X No:					
Objective evidence:	Public summary of certification assessment report and their status will be made publ in the RSPO and company website.	cly available				
1.2.1 (j)	Human Rights Policy (Criterion 6.13)	Major				
Findings	In compliance: Yes: X No:					
Objective evidence:						
Criterion 1 transactio	I.3: Growers and millers commit to ethical conduct in all business operations an ns.	d				

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1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.	Minor		
Findings	In compliance: Yes: X No:			
Objective evidence:	The company hold a policy "Ethical Conduct and Integrity Policy" which signed by the President & Chief Operating Officer- Mr Yong Chee Kong on 22 June 2015.			
	It has been communicated to all level by displaying at the GMWE and GMOM's office described the values such as:	e. The policy		
	Respect for fair conduct of business			
	Refrain from all forms of corruption, bribery and fraudulent use of funds and resources			
	Full, air, accurate and timely disclosure of relevant facts in all reports and documents dealing with applicable regulations and laws			
	Respect and protect confidential and/or privileged information to which we have access in the course of duties.			
	Interviewed the workers and confirmed that they aware of the policy			
Principle 2	2: Compliance with Applicable Laws and Regulation			
Criterion 2 regulation	2.1: There is compliance with all applicable local, national and ratified internatio s.	nal laws and		
2.1.1	Evidence of compliance with relevant legal requirements shall be available.	Major		
Findings	In compliance: Yes: X No:			
Objective evidence:	Copies of legal documents are available with the compilation of a list of applicable laws and regulations at estate and mill levels. Examples of files/legal documents/licenses verified during the audit at mill and estate are as follows:  1. MPOB licence 2. Trading License 3. Fire Certificate-Perakuan Bomba 4. Scheduled Waste 5. Permit for Scheduled Control Item			
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained.	Minor		
Findings	In compliance: Yes: X No:			
Objective evidence:	Documented system including legal requirements register (doc: SMP-GPB-22; revision	on 3; issue on		
evidence.	12 Nov 2014) is available. The content of the register as below:  a. List of local legal requirements applicable to plantation operations in Malaysia b. List of international standards/requirements applicable to plantation operation in Malaysia c. Part 1: Environment d. Part 2: Safety and Health e. Part 3: Social f. Part 4: Best Practices and other requirements g. Part 5: International Standards/Requirements			
2.1.3	A mechanism for ensuring compliance shall be implemented.	Minor		
Findings	In compliance: Yes: X No:			
Objective evidence:	As described in the Procedure on regional, national and international Laws (doc: SMP-GPB-21; revision 1; issue on 14 Aug 2014), mechanism of tracking the changes of laws is contained in the legal requirements register.			
	Chief Clerk at both GMWE and GMOM are appointed as the personnel responsible for the changes and communicating it to the estate and mill employees.	or monitoring		
	If the operating unit's current operation does not comply with the new or amended legother requirements, the estate manager shall be briefed to establish and implement management programmes and/or operation controls.			
	The estate updates the list of relevant laws and regulations that are required to maintain various legal permits.			

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Objective evidence:  Criterion 2.2: Tipeople who care use  Findings In care of the content of th	cuments she infirmation fure, recogn of the land ompliance: Dies of land to titles are as 095317347  095324511  095321574	of change for change in and reverse for the Leg to the open to the open to the open to the community of the Leg to the open to the open to the leg to the	ges from the general section of the general s	om vari the Lav in the ca ing unit d GMC ing it to s demo have le winers ity lead ustom ilable.  No: Lease)
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C. d. e. Chie the content of the con	Clarification Updating of Notification ef Clerk at be changes and he right to un demonstration cuments she infirmation for ure, recogn of the land ompliance: bies of land to dititles are as 095317347 095324511 0953245174	to the Leg to the Opoth GMW d communise the I ate that to owing le rom con ised Nat shall be Yes: itles (Cous below:	riew or al reg peratir /E and is they he avail X untry L 376.6 393.7	on the congister acong united GMC ing it to s demonstrate leaveners it y leavent ustom ilable.  No: Lease)
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CL	_ 095313750	)	172.6	30
	_ 095317061		274.2	20
CL	095326793	3	376.1	0
	_ 095325821		390.2	20
CL	095325750	)	396.4	10
CL	095326775	5	373.3	30
CL	_ 095314211		14.64	4
CL	095314248	3	13.98	8
CL	_ 095314257	7	16.89	9
CL	_ 095314266	5	16.50	0
CL	_ 095314300	)	13.15	5
CL	_ 095314319	)	15.04	4
CL	_ 095311934	-	402.8	30
CL	_ 095318059	)	270.9	90
CL	095314239	)	14.47	7
	land title de	cument,		of Learop of E

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2.2.2	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and reserves.	Minor			
Findings	In compliance: Yes: X No:				
Objective evidence:	Legal map that showing the location of boundary stone is available ( ref doc: Demarcation of Boundary on Part of CL 095313750,095311854 & 095328224 at Segaliud Lokan ) dated 22 Mar 2017 prepared licensed Surveyor ( Jurukur Masa Sdn Bhd)				
	Physical boundary stone is available and visible. Boundary stone no. 209/86 ( N5 29.864 E117 41.078) and 276/86 (N5 29.884 E117 41.478) located at block 60 and 61 (boundaries with forest reserve area) has been visited.				
	The organization should maintain a record of GPS coordinate for all boundary market that the location of boundary markers available are under controlled at all times.	rs to ensure			
	OBSERVATION				
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC).	Minor			
Findings	In compliance: Yes: X No:				
Objective	Through the stakeholder meeting and interview confirmed that there is no land disput	te.			
evidence:	Since there is no compensation involve and FPIC is not currently applied.				
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved.	Major			
Findings	In compliance: Yes: X No:				
Objective evidence:	There was no land issue since the establishment of these estates. The procedure for is clearly documented in document "Negotiation, Compensation and Handling Procedure 1.0".				
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall	Minor			
	be mapped out in a participatory way with involvement of affected parties (including neighboring communities and relevant authorities where applicable).				
Findings	(including neighboring communities and relevant authorities where				
Findings Objective evidence:	(including neighboring communities and relevant authorities where applicable).				
Objective	(including neighboring communities and relevant authorities where applicable).  In compliance: Yes: X No:  The estate land with legal titles and no restriction set on land use. There are no off the land. The existing land is not encumbered by any customary right and there is				
Objective evidence:	(including neighboring communities and relevant authorities where applicable).  In compliance: Yes: X No:  The estate land with legal titles and no restriction set on land use. There are no off the land. The existing land is not encumbered by any customary right and there is conflict.  To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their	no land			
Objective evidence:  2.2.6  Findings Objective	(including neighboring communities and relevant authorities where applicable).  In compliance: Yes: X No:  The estate land with legal titles and no restriction set on land use. There are no off the land. The existing land is not encumbered by any customary right and there is conflict.  To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations.	no land			
Objective evidence:  2.2.6  Findings	(including neighboring communities and relevant authorities where applicable).  In compliance: Yes: X No:  The estate land with legal titles and no restriction set on land use. There are no off the land. The existing land is not encumbered by any customary right and there is conflict.  To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations.  In compliance: Yes: X No:	Major  mer users in			
Objective evidence:  2.2.6  Findings Objective evidence:	(including neighboring communities and relevant authorities where applicable).  In compliance: Yes: X No:  The estate land with legal titles and no restriction set on land use. There are no off the land. The existing land is not encumbered by any customary right and there is conflict.  To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations.  In compliance: Yes: X No:  Not applicable.  The estate land with legal titles and no restriction set on land use. There are no off the land. The existing land is not encumbered by any customary right and there is	Major Major ner users in no land			
Objective evidence:  2.2.6  Findings Objective evidence:	(including neighboring communities and relevant authorities where applicable).  In compliance: Yes: X No:  The estate land with legal titles and no restriction set on land use. There are no off the land. The existing land is not encumbered by any customary right and there is conflict.  To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations.  In compliance: Yes: X No:  Not applicable.  The estate land with legal titles and no restriction set on land use. There are no off the land. The existing land is not encumbered by any customary right and there is conflict.  2.3: Use of the land for oil palm does not diminish the legal, customary or us	Major Major ner users in no land			
Objective evidence:  2.2.6  Findings Objective evidence:  Criterion 2 other user	(including neighboring communities and relevant authorities where applicable).  In compliance: Yes: X No:  The estate land with legal titles and no restriction set on land use. There are no off the land. The existing land is not encumbered by any customary right and there is conflict.  To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations.  In compliance: Yes: X No:  Not applicable.  The estate land with legal titles and no restriction set on land use. There are no off the land. The existing land is not encumbered by any customary right and there is conflict.  2.3: Use of the land for oil palm does not diminish the legal, customary or uses without their free, prior and informed consent.  Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighboring	Major  mer users in no land  ers rights of			

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	(eg: places of worship, burial grounds, and archaeological site) and maintained.						
	Stakeholder consultation with the local villages and neighbouring stakeholders showed that there is no traditional or customary land right within the estate.						
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available.						
Findings	In compliance:	Yes:	Χ	No:			
Objective evidence:	Currently, there are no claims on legal or customary rights exist for the estate.						
evidence:	However, for those estates bordering the smallholders, the company has taken action to properly demarcate the area on maps and on the ground.						
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.						
Findings	In compliance:	Yes:	Χ	No:			
Objective	Currently, there	are no	claim	ns on	legal	or customary rights exist for the estate	э.
evidence:	However, for those estates bordering the smallholders, the company has taken action to properly demarcate the area on maps and on the ground.						
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel.						
Findings	In compliance:	Yes:	Х	No:			
Objective	Currently, there	are no	claim	ns on	legal	or customary rights exist for the estate	э.
evidence:	However, for those estates bordering the smallholders, the company has taken action to properly demarcate the area on maps and on the ground.						

## Principle 3: Commitment to Long-Term Economic and Financial Viability Criterion 3.1: A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. 3.1.1 A business or management plan (minimum three years) shall be documented Major that includes, where appropriate, a business case for scheme smallholders. **Findings** In compliance: Yes: No: Objective evidence: In GMWE the 3 years of projection is available covering a period from 2017-2020 that specifies the following activities/elements: Hectareage statement - Oil Palm Mature and Immature, total planted area, title area Replanting Area · Replanting Expenditure · Ex-estate cost • Crop Production • Yield per ha · Capital Expenditure In GMOM the projection for the year 2017 – 2020 was sighted that specifies the following activities/elements: · Crop Intake - Own Estate - Direct Deliver ( outside crop )

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	- Lokan Collection Centre ( own collecting centre )								
	Processing cost								
	Extraction Rates								
	<ul> <li>Capita</li> </ul>	I Expenditu	ire						
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available.								
Findings	In compliance	: Yes:	X No	:					
Objective evidence:	Replanting Programme is sighted in their yearly 'proposed replanting programme 2017 - 2022.  Details of Replanting Programme for are as follows:								
			grammo	Area (ha)					
	Estate	2017	2018	2019	2020	2021			
	GMWE	391.45	260.17	257.04	268.18	316.15			
	This will be diprogramme.	scussed du	uring their a	annual mai	nagement r	neetings to	discuss any cha	nges in the	

Principle 4	Principle 4: Use of Appropriate Best Practices by Growers and Millers								
	Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.								
4.1.1	Standard Operating Procedures (SOPs) for estates and mills shall be documented.  Major								
Findings	In compliance: Yes: x No:								
Objective evidence:	The SOP for the mill and plantations have deen documented. The SOP cover key key processes, harvesting, transportation, manuring, IPM, GAP, Supply Chain requirements for the mill, etc. The SOP are appropriate and adequately cover all estate and mill processes and activities								
	Copy of the SOP are available on site and is it documented in an appropriate language.								
	During our visit to the operations, there evidence that SOPs are implemented and understood by workers.								
	The SOP are made available at the point of use .								
	Genting Plantations Berhad - GMWE documents their procedures and manuals of their SOP and the following documents were sighted:								
	Safe Operating Procedure (SOP) Genting Sabah Estates Malaysia (rev: 3-11 Oct 2013 ) in Bahasa Malaysia is available .								
	The following are samples of the SOP in Bahasa Malaysia sighted:								
	1) Langkah–langkah pengurusan dan Pengendalian Bahan Kimia, Minyak Pelincir dan Baja.								
	2) Langkah langkah pengurusan dan pengendalian Bahan Bakar								
	3) Langkah2 penyemburan racun menggunakan Pam racun								
	4) Langkah2 pemyenburan racun menggunakan Keadah mekanikal								

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- 5) Langkah2 meracun anak kayu
- 6) Langkah2 meracun pokok Sawit
- 7) Langkah2 rawatan ulat bungkus
- 8) Prosedur Aplikasi Racun Tikus
- 9) Langkah2 penaburan Baja Kaedah Manual
- 10) Langkah2 penaburan Baja Kaedah mekanikal and Separa mekanikal
- 11) Prosedur Kerja Penuaian Buah Sawit
- 12) Cantas dan C-kat proses penuaian Tandan Sawit
- 13) Langkah2 proses pemanduan traktor dan Jentera Berat

#### And include

- Bengkel Workshop ( Workshop )
- Pondok Pengawal, pejabat, Kawasan Perumahan , Ramp, Kuari, Kolam Air
  - 2) Sustainability Management Procedure Manual

The following are some of the procedures sighted in the Sustainability Manual

No:	Doc title	Doc. No:	rev	Last updated		
1	Control of documents	SMP-GPB-01	00	01/08/13		
2	Control of records	SMP-GPB-02	00	01/08/13		
7	Training	SMP-GPB-07	00	01/08/13		
11	Scheduled waste Management	SMP-GPB-11	00	11/10/13		

3) Review on GENP's Oil Palm Manual (June 2013)

The GenP Oil Palm manual categorised each subject under specific code relating to the different operations:

Some of the procedures sighted were as below:

Code	Operation /Subject
OPM No.1	Land clearing, Preparation, Planting, CC
OPM No. 2	OP Nursery Practices
OPM No. 3	Planting Density and Planting technique
OPM No. 5 :	Pest and disease
OPM No. 6	Weed management
OPM No. 7	Manuring
OPM No. 9	Roads and Drainage
OPM No. 11	Harvesting
OPM No. 13	Managing Difficult soils : Management of peat and acid sulphate soils

The distribution list is also stated:

- a) Head of Department ( HOD )
- b) West Malaysia
- c) Region 1 Sabah (GMWE is in Region 1)
- d) Region 2 Sabah

e) Plantation - Indonesia

The documented operating procedures for Genting Mewah Oil Mill (GMOM) are also available

- a) Standard Operating Manual (SOM)
- b) Safe Operating Procedures (SOP)
- c) Sustainability Management procedure manual

There were 52 documents in the SOP. In the Safe Operating Procedures ( Prosedur Kerja Selamat) which is in Bahasa Malaysia has the safe operating procedures for all the operations in GMOM.

Some of the Safe Operating Procedures checked in the manual were :

- 1) SOP-MGR-04 Pelawat & Kontraktor melawat Kawasan Kilang
- 2) SOP-PRD-01 Weighbridge
- 3) SOP-PRD-01 FFB Reception
- 4) SOP-PRD-02 Kerja Penyelenggaraan di transfer Carriage
- 5) SOP-PRD-04 Membuka pintu Sterilizer dan menarik cages
- 6) SOP-PRD-10 Press
- 7) SOP-PRD-11 Kerja Penyelenggaraan mesin di Oil room / Clarification
- 8) SOP-PRD- 12 Pengendalian mesin di Kernel Plant
- 9) SOP-PRD-13 Boiler
- 10) SOP-PRD-15 Engine Room
- 11) SOP-Lab-03 Pengendalian ETP
- 12) SOP-LAB-05 CPO dan Palm Kernel Despatch

#### 4.1.2 A mechanism to check consistent implementation of procedures shall be in place.

Minor

### **Findings**

In compliance: Yes:

No:

#### Objective evidence:

A master list of all SOP was available and the company keep track of revisions by indicating at the top of the document e.g. rev 00, 01,02.

The SOP into work instructions in appropriate local language, Bahasa Malaysia was also sighted.

Records of training for all levels are found in the training file.

Internal control (e.g. audit and review, field inspection) procedure in place to monitor consistent implementation of SOP

Trained and competent personnel from the Quality Control Team are assigned to carry out internal control activities.

Implementation of the internal audits are carried out regularly covering implementation of the major operations.

Procedure to address non-compliance and corrective action for continuous improvement are included in the internal audit report.

SOPs related to the various operations are documented as in 4.1.1. Operations are monitored and checked consistent implementation of procedures through supervision by their staff and mandores during their daily operation.

GMWE and GMOM keep track of the revision in the Sustainability Management procedure manual

Regular training are conducted to ensure implementation of the procedures. Only trained and competent workers are assigned to the relevant jobs.

In the estate, monthly, the QCTIR (Quality Control Team Inspection Report) will be presented as

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the mechanism for checking on the major operations i.e. harvesting and manuring

In the 2016 OYP& QCTIR report, the QCTIR reported they have conducted 189 platform grading and 208 Bunch and Loose Fruit losses summary. In it they have issued 18 CAR for non-compliance to the estate which is about 4.53%.

The following are reported:

- 1) CAR Summary
- 2) Loose Fruit and Bunch losses/ Harvester
- 3) Platform Grading for ripeness and harvesting Standard
- 4) Performance Ranking

The vehicles used for field operation are also inspected daily by the workshop personnel and driver prior to their day's work.

A notice board at the workshop was sighted on the vehicle maintenance.

In the mill, monthly, GMOM will fill in the 'monthly inspection checklist '(SOP-MNT-04-F01-1) for the different operation station to ensure safety procedures are adhered.

In addition for the work operations, the mill personnel/operator will fill in the log sheet for each station daily to ensure the operation is done correctly.

For Despatch, GMOM will fill in the 'Catatan Pemeriksaan Lori' Doc. No: GMOM-F-LAB-02. The despatch of PK and CPO on 30/3/17 was sighted.

# 4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate.

Minor

**Findings** 

In compliance:

Yes:

x No:

# Objective evidence:

The records of monitoring the major SOP have been maintained for the following:

- a) Measurements/rating or results of internal control and monitoring activities (refer 4.1.2)
- b) Records of corrective actions and improvement undertaken

In the estate, monitoring of operation e.g. manuring is done by the Genting Plantation Research Centre (GPRC) monthly known as 'Fertilizer Application Monitoring sheet ' and they will present a summary known as Quality Manuring Control (QMC) assessment to the estate after the visit.

In the latest 'summary of efficiency/ Standard of Fertilizer application Assessment report in November 2016 'reported on 10/12/16, for GMWE it was noted that out of 14 fields inspected, all the field recorded 'outstanding 'or 'OS' score. The report was reported and compiled by Nazrin Epizal Ma'mun .

They also monitor the following:

- 1) Timing
- 2) Attendance
- 3) Quality of application
- 4) Weed condition

The overall score was 100%

On their own the estate also does barn owl inspection in June and in December 2016 to monitor the presence of the barn owls released. As of to date the there were no sign of barn owls in the boxes.

Mill log sheet are available for each station. These log sheets will be filled by the operator-incharge.

There are 21 types of log sheets to be filled daily.

Some of the log sheets are : Reception, FFB handling, Steriliser, Thresher, Presss, clarification, Kernel plant etc

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	The log sheets for the day 28/3/17 was sighted. This log sheet will later be submitted by the operator to the section head. The section head will compile and submit to the engineer. The engineer will check before submitting to the Mill manager certify and approve of the day's operation and will comment if any.					
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Major Bunches (FFB).					
Findings	In compliance: Yes: x No:					
Objective evidence:	There is an SOP for third-party FFB sourcing . A list of approved third-party FFB suppliers is also available. Daily and summary records of volume and origins of third-party FFB received is recorded and these records have been verified against the available documents.					
	GMOM has a procedure manual: Supplier Evaluation , Selection & monitoring , document No: PM-MKT-04 for the evaluation of FFB suppliers.					
	GMOM has 1 third-party FFB collector known as Lokan Collection Centre owned by GMOM.					
	The mill has records of all the suppliers (88) and is recorded in the FFB supplier list.					
	A copy of their supplier licence was sampled.					
	e.g Abdul Azid b Madtaha @ Azid No. Lesen: 286314-501000, valid till 31/5/2020					
	Ha: 11.8					
	Based on the GMOM FFB Receive Details for Mr Azid In 2016, he delivered 60.37 MT.					
	.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ptimal and sustained yield.					
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard  Minor					
	Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible.					
Findings	In compliance: Yes: x No:					
Objective evidence:	There are SOP for Good Agricultural Practices in managing soil fertility and records of fertiliser application show that there are evidence that the SOPs have been implemented and monitored.					
	GMWE practices good agricultural practices as contained in their SOPs . They are followed to manage the soil fertility to levels ensuring optimal and sustainable yields.					
	GMWE was awarded the MPOB CoGAP certificate for good practices in Oct 2016.					
	One of the procedure , OPM 7: Manuring of Oil Palm is referred for managing soil fertility					
	It includes sections on :					
	a) Introduction					
	b) Nursery manuring					
	c) Field Manuring					
	d) Application of Fertiliser					
	e) Fertiliser delivery and Stock Reports for estates					
	f) Fertiliser sampling for analysis					
	g) Manuring Schedule					
	h) Method of application for younger and mature palms					
	In the SOP , the doc No: SOP-PD-04 – <i>Prosedur kerja Membaja</i> was checked					
	To improve the fertiliser efficiency and Nutrient uptake, GPB used the Genting Food For Palm (FFP) Project booklet as their guideline to maintain soil fertility and optimise yield.					

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Annually the agronomist from GPRC will provide a agronomic report as well as the annual fertiliser recommendation based on the foliar and soil sample analysis

In 2017 the agronomist that did the report was Mr Ganesan Nallan who visited the estate on 20-22<sup>nd</sup> Feb 2017.

In the same agronomic visit , Mr Ganesan Nallan , also presented an agronomic report that include:

- a) Yield against SYP
- b) Rainfall and Water Deficit Analysis
- c) Manuring Progress and Standards
- d) Manuring History
- e) Palm General appearance and Health
- f) P&D management
- g) Yield enhancement agronomy
- h) Oil Yield Project
- i) Nursery Husbandry Standards

Based on the foliar sampling and production record the annual fertiliser programme is formulated.

The 2017 fertiliser programme was sighted

The following was one of the recommendation sighted for 2017:

#### Block 69

Month	Fertiliser	Dosage
Mar	Ac	1.75 kg
May	MOP	1.25 kg
June	Ac	1.75 kg
Aug	NK Mix B 12.6/24	2.5 kg

During the audit, the application was visited and the workers were applying the amount of 1.75 kg Ammonium Chloride using a bowl that the staff has calibrated during the start of the operation to ensure that the application of 2 bowls is equivalent to 1.75 kg. this operation was sighted in Block 69. Application was done around the palm as instructed by the management.

#### 4.2.2 Records of fertiliser inputs shall be maintained.

Minor

# Findings

## In compliance:

Yes:

x No:

# Objective evidence:

Records of fertilizer inputs are maintained. By comparing the fertilizer applied/ program with the agronomic recommendation is the to proof that the fertilizer program is linked to the agronomic report.

Records of fertilizer usage per tonne of FFB production, usage per ha, costing is also available.

GMWE will receive their annual fertiliser programme/recommendation from their research centre, GPRC

Records are also kept in File 'Fertiliser Record Book' and 'Manuring Costing Book' and the following record was sighted;

a) Date: 11/2/17b) Field: 73c) Ha: 32.61 had) Estate: GMWEe) Fertiliser: ERP

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f) Quantity: 81 x 50kg g) Quantity per palm: 1.0 kg h) No. of workers: 9 i) Total costing/ ha: RM 56.19 / ha j) Application: Palm circle k) Mode: Manual As per 4.2.1, GMWE is on time on application as per recommendation schedule. Records of issuance recorded in the Store requisition Note SRN. Sighted for today's application of AC for 150kg x 50 kg for Block 69. 4.2.3 There shall be evidence of periodic tissue and soil sampling to monitor Minor changes in nutrient status. **Findings** In compliance: Yes: No: Objective There are procedures on how sampling for foliar and soil sampling are undertaken periodically. evidence: Reports of the foliar analysis results show that there is evidence of implementation of the procedure of sampling being conducted. The results of the analysis are then incorporated into the fertiliser recommendation for the fertilizer program by the plantation agronomist. Foliar tissue is sampled for analysis annually and the last result was obtained in on 7/3/17 Foliar analysis report No: FR30/2017 was sighted No. of sample analyzed: 15 The last soil sampling to monitor changes in nutrient status was done in 2010. Samples of soil were analyzed for pH, Org C, N, P, K, Ca, Mg, Na, CEC and mechanical analysis. Soil analysis report was summarized In the sample from Div 1 Field 1 (sampled in 2010) shows the Organic Carbon% at 0.94 % for the 0-30 cm depth analysed Ref: Soil OM and Soil Structure file. There were no records of any recent soil sampling done as the last sampling was done in 2010. 4.2.4 A nutrient recycling strategy shall be in place, and may include use of Empty Minor Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues. **Findings** In compliance: Yes: No: Objective In their manual and SOP, there is a nutrient recycling strategy in place to include biomass such evidence: as EFB, decanter, POME as part of the application in the fields. In the SOP Manual, OPM 7: Manuring of Oil Palm, the nutrient strategy includes the use of Empty Fruit Bunches (EFB) distributed in the field to improve the soil structure as well as to improve the organic matter. In Section 3.1.1 EFB Mulching, it documents the application on immature palm: a) Rate and frequency of application b) Method of application c) Cost of large scale application d) Manuring for EFB Mulched Immature Palm In Section 3.2.1 EFB Mulching, it documents the application on mature palm: a) Method of application b) Manuring of EFB Mulched Palms

SOP on EFB mulching recommends the following:

Palm Age	Rate per ha	Method			
Immature	25 t / ha	Immediately after planting . Yearly application till year 3.			
		Single layer in 2 concentric rings.			
		Check periodically for Oryctes beetle.			
Mature	40 t/ ha	Flat areas – EFB applied as small heap on frond rows in between every 4 palms			
		Heaps must not exceed 2 layers			
		Application rate per site is about 1.0 – 1.25 MT of EFB			
		Application of fertiliser is to be applied on the EFB sites for palms > 7 years			
		For palms < 7 years, application is to be within palm circle			

Records of distribution / received is recorded in the EFB book

In their programme, GMWE has identified the hectareage suitable for EFB application.

Below is some of the progress of EFB application:

POME is applied as land application into series of flatbeds in Block 48, 49, 50, 51, 52, 57.

Record of volume discharge is monitored by GMOM.

In the record for the period Jan 2017 the following were the amount 'received' recorded in the Soil Org matter and Soil structure

a) EFB - 822.95 MT

At the mill , the EFB will undergo a 2<sup>nd</sup> press and shredded. The shredded EFB is used as solid

### Criterion 4.3: Practices minimize and control erosion and degradation of soils.

4.3	3.1	Maps of any fragile/marginal soils shall be available.							/	Major				
Find	ings	In compliance:	Yes:	Х	No:									

#### Objective evidence:

There is soil maps showing presence of the different soil types including possible fragile soils and problem soils .

Appropriate geo-referenced and of appropriate scale were available.

Soil Maps of 1:48,6000 was sighted in the file 32: Soil Management

Soil series in GMWE are:

Soils classification	Planted ha
Lokan	144.47
Kinabatangan	513.11
Kalabakan	3605.49
Silabukan	733.50
Weston	139.38
Luangmanis	5.70
Sapi	269.21

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4.3.2					place for plantings o erwise by the compan		n 9 Minor	
Findings	In compliance:	Yes:	х	No:				
Objective evidence:	The estate will refer to the following procedures for guidance							
	a) OPM 4 : Soil conservation and terracing( rev. 2013 )							
	b) Steep land Management SMP –GPB-10							
	The estate also has a file known as File 32: Soil Management where the following are identified for reference:							
	a) Soil Map							
	b) Slope class and topography map							
	c) Soil Management plan							
	d) High Erosion Risk area maps - Bare Ground Areas, 1-5 years planting , Fragile / Problematic Soil Areas							
	Based on the slope classes map, the followings were identified in GMWE : Estate Slope Map ( 29/7/13 )							
	Slope Class			Desc	ription	Percentage of	Percentage of total area	
	0° - 6°			Flat		5169.53( 96.0	5169.53( 96.02% )	
	6° - 10°			Undu	lating	182.10 ( 3.38	182.10 ( 3.38 % )	
	10° - 15°			Rollir	ng	31.48 ( 0.58%	31.48 ( 0.58% )	
	15° - 20°			Hilly		0.84 ( 0.02%)	0.84 ( 0.02%)	
	20° - 25°			Stee	0	0 %	J %	
	>25°			Very	Very Steep 0 °		%	
100							Adinan	
4.3.3	A road maintenance programme shall be in place.						Minor	
Findings	In compliance:	Yes:	Х	No:				
Objective evidence:	There is a road maintenance programme in place with supporting budget and resources. Records of road maintenance records are also available.							
	The road maintenance programme is found in the 'Road Maintenance programme' file.							
	In GMWE , the following budget w			et was al	ocated for 2017 and th	e to-date expendit	late expenditure is:	
					Budget ( RM)	Actual as	of Feb 2017	
	Road ( CPO roads, Main trunk road)				818,000	58,026.19		
	Bridges				78,960	9,390		
	Path				58,074	0		
4.3.4					ninimised and monito		ted Major	
4.3.4 Findings							<b>ted</b> <i>Major</i>	
	water and grou In compliance:	nd cove	r mai	No:		in place.		

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	replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing.						
Findings	In compliance: Yes: x No:						
Objective	Based on the soil types reported in 4.3.1 , there is no peat soil type in GMWE						
evidence:	Not applicable as there are no peat soil type in GMWE.						
4.3.6	A management strategy shall be in place for other fragile and problem soils  (e.g. podzols and acid sulphate soils).  Minor						
Findings	In compliance: Yes: x No:						
Objective evidence:	There are no fragile and problem soils in GMWE.						
Criterion 4	.4: Practices maintain the quality and availability of surface and ground water.						
4.4.1	An implemented water management plan shall be in place.  Minor						
Findings	In compliance: Yes: No: x						
Objective evidence:	The water management plan is documented in File No: 28: Water Management Plan and Practices.						
	The document include :						
	1) Water management plan						
	2) Peat soil Management ( if any )						
	3) Other problematic / Marginal soil Management plan						
	The water management plan identifies the areas of concern , the action plan and monitoring as well as the PIC and Status for each area identified such as:						
	a) Flood area						
	Monitoring of rainfall data						
	Desilting programme						
	Plant depth stick to monitor level						
	b) Water quality						
	Protection of watercourses & wetlands						
	c) Water Pollution						
	Chemical mixing Bay						
	Installation of debris trap						
	Septic tank  Al Nursery						
	d) Nursery						
	Monitor water usagefor nursery watering     Sodiment pend to retain water before everflowing to drain						
	Sediment pond to retain water before overflowing to drain      Draing a system at linesite.						
	Drainage system at linesite     e) Optimize water usage and reduce wastage						
	Pump maintenance						
	The above plan was reviewed on 21/2/17						
	The document also include the following Sections:						
	1) Introduction						
	Main water resources at GMWE						

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- 3) Population requirement
- 4) Water Management
- 5) Water quality management
- 6) Flowchart for the management of the water treatment plan.

The estate has 2 water treatment plants ( in Div 4 ( Lokan Estate ) and Division 1 ) and one sourced from the Mill (  ${\sf Div}$  3 ) .

Water consumption for domestic use is being recorded at the estate for the water use consumption record.

Each house is provided 3 water tank with a total capacity of 2800 lits .

Analysis of water was sighted from the 3 plants .

The result show that the treated water from the mill was within the Drinking Water Quality Standard however the Div 4 analysis in Feb 2017 show that the pH value was  $5.4 @ 25^{\circ}$ C which was below the standard of 6.5 - 9.

Similarly the Div 1 analysis show that Faecal coliform and E.coli of 20 MPN/100 ml was detected .

GMWE has received a quotation/Proposal for the purchase of chlorination for water treatment plant in 6/1/17, however the GMWE has yet to make a decision on the purchase.

Analysis of treated water was not included in the water management plan of GMWE

#### MINOR 01

Flow meter has just been installed for the estate treatment plant in March 2017 to monitor the water usage.

Based on the March 2017 records, GMWE present usage show that they are using 173,000 lit / 295 occupants = 586 lit/person /day.

For the mill the usage in Feb 2017 calculated was 3790000 / 583 occupants = 232 lits / day / person ( 28 days )

The usage includes domestic usage in the mill, div 1 as well as to the nursery .

This exceed the target of 200 lits / person / day.

Sabah has not impose a fee for the abstraction.

The raw water sourced from river Sg Lokan was also sighted and analysis report done by Dynakey Lab for the upstream and downstream.

The Certificate of analysis report Lab ref No: 20170209/03A-03B sampled on 6/2/17 done by Dynakey Laboratories Sdn Bhd was sighted.

Parameters tested were pH, BOD, SS, AN, TN, O&G.

The results show that there was no marked or negative impact of the estate and mill operation to the parameters analyzed as the water quality upstream and downstream does not show significant differences and are within limit.

# 4.4.2 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. Findings In compliance: Yes: x No:

### Objective evidence:

Maps of the rivers of river Sg Lokan and river Sg Kinabatangan are sighted .

The estate will refer to the SMP procedure: Riparian Buffer zone Management SMP-GPB-14 as guideline to protect the water courses in the estate.

The riparian area of river Sg Lokan in Block 60-61 was visited. There was a boundary marker of GPS coordinate N5° 29' 51.98, E 117° 41' 45" sighted inside the riparian bufferzone.

There were some sighting of walk paths in the riparian and GMWE management is aware of local

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villages using it as as part of the recreational activities.

They have allowed the natural vegetation to be established along the site.

Visit show that the no spraying or manuring activity was sighted. Mechanical slashing was done to control the weeds around the catchment pond.

Interview with the spray and manuring operators indicate that they are aware of the riparian.

4.4.3 Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national regulations (Criteria 2.1 and 5.6).

Minor

**Findings** 

In compliance: Yes: x No:

## Objective evidence:

- a. Is the mill effluent treatment process in place?
- b. Is there a process in place for checking and monitoring water discharge quality, particularly BOD?
- c. Is the water discharge quality in compliance with national regulations?
- d. Does the mill have a license for treatment, discharge or land application of mill effluent, and is the mill in compliant with the requirements of the license?

GMOM wastewater is treated in a series of ponds with a hydraulic retention time of 470 days.

Name of Pond	No. of ponds
Buffer Cooling	2
Anaerobic Pond	4
Aerobic Pond	4
Mixing Pond	1
Stabilizing Pond	1
Total ponds	12

After Mixing Pond Number 9, the POME will be pumped to the MBR ( Membrane bio-reactor system ) . After that it will be pumped to the Stabilizing pond .

The final discharge is sighted in the Site plan GMOM/MBR/01

After going through the serried of ponds, the POME is pumped to the flatbeds located in the field Block 48, 49, 50, 51, 52,57 of the estate. A GMOM worker will be incharge of the control of the release to the flatbed to ensure no over-flow.

The POME is not discharged into waterways.

The GMOM has a DOE licence No: 001879 ( 1/7/16 – 30/6/17) for discharging the POME under the category 'Alurair / Pengairan Ladang Application as per the layout plan GMOM/DOE/2014/ETP/02 LP/01 dated 28 Oct 2014 .

Based on the license the BOD at the final discharge should be < 20 mg/l .

The Mill complies with the local DOE A.S 4 to submit analysis and volume of the POME every quarterly

The followings are the BOD results for 2016 which show that GSOM complies with the limit set by DOE. It has improved since the Jan- Mar 2016 readings.

Quarter	BOD mg/l
Jan '17 – Mar '17	3,5

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Oct '16 – Dec '16	2.7, 3.3, 2.3
Jul '16 – Sept '16	8.5,4.4., 5
Apr – Jun '16	12,13,7
Jan – Mar '16	39,39,3

The volume of effluent that is discharge into the flat bed, land application is recorded in the effluent log book. Based on the quarterly DOE A.S.4 submission the following was reported:

Month 2016/2017	Av. volume discharge per day ( m3)
Dec 2016	398.92
Jan 2017	286
Feb 2017	284

# 4.4.4 Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored.

Minor

Findings

In compliance:

Yes:

s: x No:

## Objective evidence:

Water for mill processing and domestic usage is abstracted from the nearby river, Sg Lokan.

Water usage is being monitored both monthly and yearly. Records were sighted in the Water Usage Record file.

The water usage for processing and domestic usage is recorded.

In 2016, the av water usage per FFB processed is 1.58 m3 / MT FFB.

The following is the monthly monitoring for the last 3 months in 2016/17.

Month	FFB processed (MT)	Mill Process	Domestic	Total	water usage / FFB processed
Dec '16	122280	17779	11702	29481	1.75
Jan '17	11172	20412	7765	28177	1.83
Feb '17	9437.94	15632	13527	29159	1.66

# Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.

4.5.1	Implementation monitored.	of	Integra	ted	Pest	Management	(IPM)	plans	shall	be	Major
Findings	In compliance:	Yes:	х	No:							

# Objective evidence:

Documented IPM is found in the Oil Palm Manual under 'Pest and disease (revision June 2013 ) OPM 5

It identified the pest both in the Nursery as well as in the field such as :

- a) bagworms
- b) nettle caterpillars

- c) Grasshopper
- d) Rhinoceros beetles
- e) Bunch moth
- f) Vertebrates such as rats
- g) Pest & Diseases in nursery
- h) Ganoderma

The document also shows the lifecycle, type of species as well as the chemical , physical and biological control method recommended.

The estates also monitors the following for IPM:

- a) Rat damage census
- b) Pheromone trap for Oryctes beetle catch monitoring census (only for GMWE)
- c) Beneficial plant location/maps

Records of IPM maps of beneficial plants and barn owl boxes were sighted in the IPM file 58 and P&D , Monitoring and Census Record file 59.

Techniques used (cultural, biological, mechanical and physical methods are included in the SOPs.

GMWE has introduced of barn owl into their estate in July 2016 however after 6 months there were no sign of the released barn owl in the 9 barn owl boxes.

They released 13 pairs.

Intervention using chemical is recorded in the costing book.

Based on their SOP and IPM Presentation 'Rat attack and control Method 'for IPM rat control baits will be applied when the census records of fresh damage of 20% on the platform bunches.

For Baiting using 1<sup>st</sup> generation baits, baiting will commence and rounds will be repeated after 4 days. Baiting will cease when acceptance is less than 20%.

Record of census recorded in the Rat Damage Census Form and baiting record sighted in the 'Costing for *Ladang 2* rat baiting '

The following evidence was sighted.

Block: div 2, Block 16. Date census: 1/2/17

Record of damage: 20.75%

Date baiting commence: 11/2/17

No. of rounds before baiting stop: 6

Replacement %: 15.49%

For Ganoderma, as there are no effective control, the palm are marked and recorded.

Mounding will be done on prime age palms (10 – 20years).

Sanitation / removal of infected palm will be done prior to felling for replanting

#### 4.5.2 Training of those involved in IPM implementation shall be demonstrated. Minor **Findings** In compliance: Yes: Х No: Objective Date No. of participants Trainer evidence: 25/3/17 Training IPM GPRC Research Exec Mr 14 (staff, field Haffizi supervisor and Mandores)

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4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available.  Major							
Findings	In compliance: Yes: No:							
Objective evidence:	The SOP and the Justification of Pesticide used is sighted in the SMP-GPB-28. (2/9/12016)							
	It records the :							
	a) Introduction							
	b) Procedures on pesticide Usage							
	c) Type of pesticide							
	d) Herbicide							
	e) Insecticide							
	f) Fungicide							
	g) Rodenticide							
	It also tabulate the following for the different chemicals:							
	h) Crop stage							
	i) Application Type							
	j) Pesticide Names							
	k) Active Ingredient							
	I) Class ( by Pesticide Malaysia )							
	m) WHO class							
	n) Target Weed/Pest							
	o) Justification of Use							
	All the products used in the estate are officially registered under the Pesticides Act 1974 (Act 149)							
	Below are the products sighted at GMWE chemical store							
	a) Ally- Herbicide							
	b) Supremo- glyphosate - Herbicide							
	c) Comet							
	d) Matikus							
	e) Ebor Bait							
	f) Antracol							
	g) Kenlon							
	h) Alion							
	i) Fezmet							
	j) Thiram							
	k) Ken-Amine 600							
	N Neti-Attilité 000							
	However they have not included the transferred chemicals such as Kenlate and Pestac into the justification list.							
	OBSERVATION 03							

4.6.2 Records of pesticides use (including active ingredients used and their LD50, Major area treated, amount of active ingredients applied per ha and number of applications) shall be provided. **Findings** In compliance: Objective The estate has a weeding/pesticide programme and records of pesticide use is recorded. evidence: Ref: File Costing Spraying Estate: GMWE a) Date: 29/3/17 b) Type of work: circle spraying c) Block: Block 3 d) Ha: 37.79 e) Chemical use: Glyphosate (Suprermo 41)+ Ally f) Dosage: 600ml +25g / 10 lit g) Equipment: Inter12pump Knapsack h) Nozzle: black nozzle, 32 lit / ha Total cost / ha: RM 17.37 / ha No. of workers: 5 The records of pesticides use (including active ingredients used and their LD50, area treated amount of active ingredients applied per ha is found in the 'Pesticide Monitoring Record from Year 2014 - 2017. Based on the record, the following were sighted for GMWE Year Ha a.i kg / ha 2014 3.64 2138.64 2022.61 2015 4.41 2060.29 2.52 2016 2046.87 2017 (till Feb) 0.19 4.6.3 Any use of pesticides shall be minimised as part of a plan, and in accordance Major with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice. **Findings** In compliance: Yes: Х No: Objective Use of pesticide is minimized and part of the IPM programme. evidence: To reduce chemical use the following is implemented in GMWE. a) Planting of beneficial plant b) Introduction of Barn Owls Documented IPM is found in the Oil Palm Manual under 'Pest and disease (revision June 2013) OPM 5. It identified the pest such as: a) bagworms b) nettle caterpillars c) Grasshopper

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	1				
	d) Rhinoceros beetles				
	e) Bunch moth				
	f) Vertebrates such as rats				
	g) Pest & Diseases in nursery				
	h) Ganoderma				
	It also shows the lifecycles, type of species as well as the chemical , physical and bio control method recommended.	logical			
	Prophylactic used is confined to the spray in the nursery whereby the seedlings need ensured protected.	d to be			
4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in industry's Best Practice. The use of such pesticides shall be minimised and/or eliminated as part of a plan, and shall only be used in exceptional circumstances. Pesticides selected for use are those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000).	Minor			
Findings	In compliance: Yes: x No:				
Objective	Chemicals listed on the Stockholm Conventions are not used at all .				
evidence:	World Health Organization Type 1A or 1B, or listed by the Rotterdam Conventions are used only in specific situation e.g monocrophos or methamidophos when there is leaf eating insect infestation on mature palms where trunk-injection is used to administer the chemical . The use is in line with the national best practices where application to the authorities is made for its usage.				
	Herbicide like paraquat, are now being phased out and replaced by herbicide like glyphosate mixed with broadleaf herbicide.				
	During the chemical store visit , none of the chemicals were sighted .				
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).	Major			
Findings	In compliance: Yes: No:				
Objective	a. Is there SOP for chemicals/pesticides handling?				
evidence:	b. Is there a training plan and training records for workers who apply or handle pe	esticides?			
	c. Is there evidence that training has been conducted in an appropriate language understood by the workers?				
	d. Are pesticides handled, used or applied only by persons who have completed the necessary training?				
	e. Are the workers involved in chemical handling or application able to demonstrate understanding of the hazards and risks related to chemicals used when interviewed?				
	f. Are pesticides always applied in accordance with the product label?				
	g. Are MSDS for pesticides used readily available for easy reference?				
	h. Is appropriate safety and application equipment provided and used?				
	i. Is PPE used appropriate according to recommendations in any risk assessme	nts done?			
	j. Is appropriate PPE provided and used, and can it be easily replaced if damage				
	k. Does the management checked the workers usage of appropriate PPEs?				

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Based on the training material, there is evidence that the training has been conducted in appropriate language understood by the workers.

Pesticide is only handled, used or applied only by workers/ mandores who has completed the necessary training.

When interviewed the spray operators and mandores were aware of the chemical they were applying, dosage chemical class as well as the use of appropriate PPE.

Pesticide are used accordance to label unless it has been approved by the management due to the pest/weed composition.

MSDS is available at the main chemical storage site, office as well at the clinic. However the MSDS of the chemical used in the Nursery, Pestac, was not available in the nursery store but available at the main store

#### **OBSERVATION 04**

The equipment used is checked prior to use to ensure no leakages.

PPE is provided to all spray operators and during audit, it was noted that the PPE is being worn. The spray operators is aware of replacing the filter when due.

The 2017 training programme, some of which are related to pesticide handling for the estate

No.	Training topic	Participants	Date
1	Fire Extinguisher use	Staff , Mandores, Creche Ayah	21/2/17
2	Safety briefing Drill	workers	21/2/17
3	PPE use	workers	17/1/17
4	Safe chemical handling, sprya operation and transport	Store keeper, attendant, mandore and spray operators	10/1/17
5	Safe training FFB, EFB loading & Transport	workers	19/1/17
6	Chemical spillage training	Workshop and store	6/2/17
	Trainer : Hanif		
7	Safe training Harvesting , Pruning PPE use	Harvesters	17/1/17
8	Safe training Manuring , application , Transport and PPE use	Drivers, loaders, manuring	9/2/17
9	First Aid	All first aid handler	12/1/17
10	IPM	Staff and workers	25/3/17
11	Sustainability training	AM, Store, sustainability clerk	23/2/17
12	Riparian training/ Buffer zone	Spray and Manuring team	10/1/17
13	Briefing Safety Policy	All workers	17/2/17

During the interview with spray operators, it was found that they were attired with the appropriately PPE.

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	The following were the spray operators checked:						
	a) Norkayah Kappe/ Sidar Rappe						
	b) Dina						
	c) Ros Supu						
	d) Hati Baco						
4.6.6	Storage of all pesticides shall be according to recognized best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Regulations.	Major					
Findings	In compliance: Yes: No:						
Objective evidence:	Pesticides are stored according to recognized best practices.						
evidence.	The storage site is robust , concrete $% \left( 1\right) =0$ with fenced , lock and key . It is $% \left( 1\right) =0$ ventilated, we good roofing.	ell lit and with					
	The store has hazard signs posted on the entrance.						
	Spill kit using sand as the absorbing material was not sighted at the store but placed outside the store.	at the site					
	OBSERVATION 05						
	The emergency shower, eye wash and tap or water source is within easy reach in cas is sited at the premix area .	se of spillage					
	There is a site available for the workers to dry their washed PPE.						
	Empty chemical containers are sent to the storage site at the workshop. The estate visome of the 20 lit for premix and relabeled.	would use					
	Empty chemical containers were sent to the Scheduled Waste storage site and they to be triple rinsed and punctured	were found to					
	Records of last disposal recorded on 21/12/16 for SW 409 – Contaminated container 250 kg / 1532 pieces	Records of last disposal recorded on 21/12/16 for SW 409 – Contaminated container of quantity					
4.6.7	<del></del>						
4.0.7	Application of pesticides shall be by proven methods that minimise risk and impacts.	Minor					
Findings		Minor					
-	impacts.						
Findings Objective	In compliance: Yes: X No:  Work instruction for pesticide application is stated in the Standard Operation Procedu	ıre of the					
Findings Objective	In compliance: Yes: X No:  Work instruction for pesticide application is stated in the Standard Operation Procedurestate.	ıre of the					
Findings Objective	In compliance: Yes: X No:  Work instruction for pesticide application is stated in the Standard Operation Procedu estate.  Records of annual safe operation training for spray operators , calibration are available.	ire of the ble.					
Findings Objective	In compliance: Yes: X No:  Work instruction for pesticide application is stated in the Standard Operation Procedu estate.  Records of annual safe operation training for spray operators, calibration are available Risk and impact of pesticide application is also identified in the HIRARC  The spraying equipment used in GMWE is mainly the Inter12 pump' knapsack spray	ire of the ble. ver with					
Findings Objective	In compliance: Yes: X No:  Work instruction for pesticide application is stated in the Standard Operation Procedule estate.  Records of annual safe operation training for spray operators, calibration are available Risk and impact of pesticide application is also identified in the HIRARC  The spraying equipment used in GMWE is mainly the Inter12 pump' knapsack spray appropriate nozzles.  During the audit, the spray operators were using the 32 lit/ ha nozzle with their Inter1 sprayers  Pesticides shall be applied aerially only where there is documented	ire of the ble. ver with					
Findings Objective evidence:	In compliance: Yes: X No:  Work instruction for pesticide application is stated in the Standard Operation Procedule estate.  Records of annual safe operation training for spray operators, calibration are available Risk and impact of pesticide application is also identified in the HIRARC  The spraying equipment used in GMWE is mainly the Inter12 pump' knapsack spray appropriate nozzles.  During the audit, the spray operators were using the 32 lit/ ha nozzle with their Inter1 sprayers  Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to	re of the ble. ver with 2 pump					
Findings Objective evidence:	In compliance: Yes: X No:  Work instruction for pesticide application is stated in the Standard Operation Procedule estate.  Records of annual safe operation training for spray operators, calibration are available Risk and impact of pesticide application is also identified in the HIRARC  The spraying equipment used in GMWE is mainly the Inter12 pump' knapsack spray appropriate nozzles.  During the audit, the spray operators were using the 32 lit/ ha nozzle with their Inter1 sprayers  Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide	re of the ble. ver with 2 pump					

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and associated smallhomade available. (see Ci		nowledge and skills of employees	Minar							
		andling shall be demonstrated or	Minor							
In compliance: Yes:	x No:									
knowledge and skills of	e training ( in appropria employees/workers on	ite language e.g Bahasa Malaysia ) to pesticide handling.								
Proper disposal of was understood by workers	te material, accordin	g to procedures that are fully	Minor							
	y No:									
<u>_</u>		asta material?								
c. is there evidence	or implementation of p	Toper ways for waste disposal by the t	ompany?							
SOP for proper disposal of waste material available:  a) SMP-GPB-11: Scheduled Waste Management  b) SMP-GPB-12: Landfill and domestic waste Management										
Proper waste disposal ad	ccording to procedures	were sighted .								
Annually training are conducted to raised awareness of proper waste disposal to workers as well as to the estate personnel.										
Waste are identified e.g. domestic waste, Scheduled waste, recyclable waste and empty chemical containers at designated storage area at the Estate compound.  GMWE has also provided both domestic waste bins as well as recyclable bins at the line site for household to dispose of their litter and waste.  GMWE has seperate storage area for their Scheduled waste, empty chemical container, etc  In December 2016 the following waste were disposed from the estate by the approved collector, Legenda Bumimas.										
							Waste Material code	Consignment note	Collection ( kg)	
							410	A018577	120	
							408	A018578	120	
409	A018580	250								
305	A018576	2,280								
102	A018579	30								
	Rnowledge and skills of each Training plan 2017, evide training file.  Proper disposal of was understood by workers 5.3).  In compliance: Yes:  a. Is there an SOP for b. Is there training p. c. Is there evidence  SOP for proper disposal and SMP-GPB-11: Soc. b) SMP-GPB-12: Land Proper waste disposal and Annually training are contact to the estate personned Waste are identified e.g. chemical containers at disposal dispose of GMWE has also provide household to dispose of GMWE has seperate stote In December 2016 the following properties of the GMWE has seperate stote In December 2016 the following provided and Bumimas.  Waste Material code 410  408  409  305	Rnowledge and skills of employees/workers on Training plan 2017, evidence of periodic training training plan 2017, evidence of periodic training training file.  Proper disposal of waste material, according understood by workers and managers shall 5.3).  In compliance: Yes: x No:  a. Is there an SOP for proper disposal of w b. Is there training provided to workers and c. Is there evidence of implementation of p SOP for proper disposal of waste material avail a) SMP-GPB-11: Scheduled Waste Manag b) SMP-GPB-12: Landfill and domestic waste of the estate personnel.  Waste are identified e.g. domestic waste, Schechemical containers at designated storage area as to the estate personnel.  Waste are identified e.g. domestic waste, Schechemical containers at designated storage area GMWE has also provided both domestic waste household to dispose of their litter and waste.  GMWE has seperate storage area for their Schen December 2016 the following waste were discussed and Bumimas.  Waste Material code Consignment note  410 A018577  408 A018578  409 A018580  305 A018576	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3).  In compliance: Yes: x No:							

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	For more info , plea	ase refer	to Criterio	on 5.3			
4.6.11					pesticide operators, and h conditions, shall be demonstrated.	Major	
Findings	In compliance: Y	'es: x	No:				
Objective evidence:	Annual medical sur available for the fo			HH 1)	as per CHRA for plantation pesticide op	erators were	
	There were 43 employees listed and the records of annual medical surveillance were sighted						
	The following female spray operators annual medical surveillance were viewed:						
	The following were the spray operators checked:						
	a) Norkayah	Kappe/ S	idar Rapı	ре			
	b) Dina						
	c) Ros Supu						
	d) Hati Baco						
					Pratap Gopal DOSH: HQ/12/DOC/00/2ss' and were deemed 'FIT' to continu		
	The surveillance w	as done o	on 12/4/1	6			
	The cholinesterase contact with organo				d for the spray operators as they do not	come in	
	Individual medical treatment records of the sample workers were accessible and sighted.						
4.6.12	No work with per women.	sticides	shall be	unde	rtaken by pregnant or breast-feeding	<b>M</b> ajor	
Findings	In compliance: Y	'es: x	No:			I	
Objective evidence:	Based on the record at the clinic, GMWE used the LMP (Last menstrual Period) as the guide to ensure that no work with pesticide undertaken by pregnant or breast-feeding women.						
	The clinic has a list				rkers handling pesticides. Based on the en.	records there	
	Monthly the female spray workers will be asked and interviewed by the clinic hospital assistant and if the LMP is > 3wks , the Urine pregnancy test will be conducted.						
Criterion implemen		al health	n and sa	fety p	plan is documented, effectively comi	nunicated and	
4.7.1		plan cov	ering all	activ	y shall be in place. An occupational ities shall be documented and itored.	Major	
Findings		'es: x				1	
Objective	,	•	•	•	•		
evidence:	& President- Yong	Chee K	ong is a	vailabl	5 and signed by the company's Chief O e that among others specifies the req f the Occupational Safety and Health Ac	uirement of the	
	The policy is sighte	ed in both	Bahasa	Malay	sia and English		
	The Safety Policy of the briefing was		ntly briefe	d to th	ne workers on 17/2/17 for the various Div	vision . Records	
	a safe & Healthy v	working e	environme	ent to	hat transmit the commitment of the com all its workers as well as other stakel tors. The plan also specifies the object	olders such as	

which states as follows:

- i. To provide and maintain a working environment that is safe without risk to health and adequate as regard to welfare at work;
- ii. To provide information, instruction, training and supervision to enable workers to perform their work in a safe manner;
- iii. To achieve ZERO fatal accident rate;
- iv. To promote on OSH campaign ( safety week ) to create the importance of environment, safety and health to all operatives:
- v. To encourage commitment of all employees in eliminating risk; and
- vi. Continuous improvement on OSH management

#### The plan covers:

- 1) OSH Objectives
- 2) OSH policy communication & implementation
- 3) Training plan
- 4) Accident & incident Statistics
- 5) OSH Meetings
- 6) HIRARC
- 7) ERP
- 8) First aid Kit
- 9) OSH coordinator
- 10) Audit and Inspection Details

During 2016 the following were conducted:

- a) DOSH visit 14/2/17
- b) MPOB CoGAP 17-18/4/16
- c) Workplace inspection 16/3/16, 16/6/16, 14/9/16, 14/12/16

The DOSH visit report, Akta Keselamatan dan Kesihatan Pekerjaan 1994 (Akta 514): Notice Perbaikan dated 14/2/17 was resolved as there were evidence of the DOSH accepting the clarification by GMWE dated 17/2/17.

Based on record, the audit team noted that the estate has identified the responsible person for coordinating the occupational safety and health which is the OSH coordinator- Hospital Asst Laminin Muslin . The letter of appointment dated 21/1/16 signed by the Pengerusi OSH, En Abd Rahim Wilson Abdullah was made available to the audit team during the audit.

Visit in the field, it was noted that the workers are aware of the PPE for their safety usage.

At the mill the OSH management plan for 2017 was sighted. .

JKKP visited the mill on 3/1/17. Visit was documented in the DOSH log book. Issues raised were transferred into the CAR form Doc No: PM-MGR-02-F01-1 on 3/1/17. Number of issues raised :

Submission to DOSH/ JKKP was done and received on the 25/1/17

4.7.2 All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly

Major

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	observed and a	pplied t	o the	worke	rs.				
Findings	In compliance:	Yes:	Х	No:					
Objective evidence:	Risk assessments has been conducted and documented for all operations where health and safety is an issue in the document No: GMWE/HIRARC/05/16 : HIRARC								
	The risk assessment covers all the organization's processes and activities as stated in the document.								
	For estate the HIRARC being review at planned interval for the adequacy and last was updated on August 2016. The HIRARC effectively covers all the 24 plantation activities ranging from driving, harvesting, spraying, manuring, road maintenance works, chemical storage and etc.								
	The last revision /amendment was conducted in August 2016 by Mr Khairul Fahmi , Asst Manager.								
	Each activities is	tabulate	ed un	der the	follov	ving category:			
	1) Activity								
	2) Bahaya (h	nazard)							
	3) Kesan (im	npact)							
	4) Kawalan S	Sediaad	a (ex	isting c	ontrol	)			
	5) Keperluar	n perund	langa	n (lega	l requ	uirements)			
	6) Keterukar	n (severi	ty)						
	7) Kebarang	kalian (p	oroba	bility)					
	8) Kadar risiko (risks)								
	9) DFA / Dec	cision fo	r Acti	on					
	10) Cadangan Kawalan (proposed control)  11) PIC Due Date Status  In the OSH Manual, the HA presented the flow chart on what to do during an accident and the reporting will be differentiated based on:								
	1) Ringan/light ( < 4 days )								
	2) Berat/hea	vy (>4	days	or <i>hila</i>	ng up	paya kekal/permanent disability)			
	3) Mati/dead	1							
	GMWE als has e	establish	ned a	reportir	ng sy	stem using the :			
	1) OSH com	plaint fo	rm						
	2) Accident I	nvestiga	ation I	Report					
	3) Witness S	Statemer	nt Rep	port					
	There were r	no JKKF	6 re	porting	in in :	2016 as well as in 2017.			
	Similar HIRARC ı	relating	to the	e operat	tions	of the mill is also sighted			
						available at strategic location such as offi were check and contents found to be con			
						and JKKP 8 are well documented and th able during onsite audit.	e submission		
4.7.3						all be adequately trained in safe dequate and appropriate protective	Major		

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	equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.						
Findings	In compliance: Yes: x No:						
Objective evidence:	GMWE is serious on the safe operating procedures and they have establish a Safe operating training plan to conduct regular safety training so that all workers involved in the operation are appropriately trained in safe working practices.						
	During field visit to the spray operators operation, Manuring , harvesting, workshop and the chemical store , appropriate protective equipment are available to all workers at the place of work to cover all potentially hazardous operations.						
	First aid kit and fire extinguisher observed available at strategic location such as office, chemical store, workshop and line site.						
	During field visit, first aid kit were check and contents found to be complete and in usable order.						
	At the mill the OSH training & management plan for 2017 was sighted.						
	The following were some of the training planned:						
	1) ESH Policy & subpolicy/ ESH Objectives						
	2) ESH Complaint & Feedback system						
	3) SOP and HIRARC						
	4) Job Description						
	5) Environment control Procedure						
	6) Maintenance of PPE/ Calibration of PPE						
	7) Emergency Preparedness for First Aid						
	8) Spillage Respond Drill  9) Management of Scheduled Waste						
	9) Management of Scheduled Waste						
	10) CSDS  11) ESH legal requirement						
	11) ESH legal requirement  12) ESH Incident Investigation Report						
	12) ESH Incident Investigation Report  13) Workplace Inspection for OSH Act and Regulation						
	13) Workplace Inspection for OSH Act and Regulation In the mill, based on the training plan and records, personnel/ workers in the engine room where it has been identified in the noise mapping as high noise ( >90dB) has been regularly trained on the risk of high noise. The latest training was conducted on 3/3/17. The training included HIRARC – its risk identification, its rating and its control.						
	Records of the competency evaluation were available conducted after every training session.						
	The evaluation records of 3 engine operators , Mr Arsyad, Ragelo and Mohd Fasrie before and after training were sighted.						
	In the evaluation records, the mill manager approved the engine room workers after completing the training and the evaluation.						
4.7.4	The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.						
Findings	In compliance: Yes: x No:						
Objective							
evidence:	Based on record, the audit team noted that the estate has identified the responsible person for						

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coordinating the occupational safety and health which is the OSH coordinator- Hospital Asst Laminin Muslin . The letter of appointment dated 21/1/16 signed by the Pengerusi OSH, En Abd Rahim Wilson Abdullah was made available to the audit team during the audit.

For the mill the Mill Manager has been appointed as the personnel responsible for safety and health . Appointment as the Pengerusi JKK sighted 1/10/15

The following were the meeting s conducted for GMWE

Date GMWE	GMOM
24/2/17	3/3/17
15/12/16	15/11/16
15/9/16	17/8/16
17/6/16	20/5/16

During the latest safety meeting the following were discussed in the estate :

- 1) PPE
- 2) Hazard signages along road
- 3) Safety badge
- 4) Anjing liar/ Stray dogs
- 5) Necessity of Fogging
- 6) Use of Safety helmet for motorcyclist
- 7) Accident Report

The latest mill Safety meeting discussed on:

- 1) Appointment of new committee and representatives
- 2) Workplace inspection report
- 3) CHRA
- 4) First aid Kit
- 5) Accident report
- 6) Fire fighting system
- 7) Complaint Book ( DOE , JKKP , stakeholder )
- 8) Monitoring and measuring report
- 9) Unsafe Act

Annually the VMO, Dr Shaji A/L Prathap Gopal will do his visit to the estate and the mill.

4.7.5 Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.

Minor

**Findings** 

In compliance:

Yes:

x No:

#### Objective evidence:

At GMWE, safety in operation and training are done regularly during training as well as the morning briefing.

All emergency procedure are documented in the OSH Manual.

'Plan tindakan Tumpahan Kimia( chemical spillage plan ) 'and Plan 'Tindakan Kecemasan

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Kebakaran (emergency procedure in case of fire) 'was sighted

Recently due to an incidence of crocodile sighting , GMWE has establish a SOP on work procedure when confronted with a crocodile.

In the SOP, they have identified the risk area, and signages has been erected to warn workers.

Accident and emergency procedures are in Bahasa Malaysia and English . This is understood by the responsible workers, staff or executives involved in the operation.

These ERP are sighted at places such as:

- a) Chemical and fertiliser store
- b) Workshop
- c) Diesel skid tanks
- d) Line site
- e) Office

GMOM has ERP for fire, spillage, effluent overflow.

First aid kits are sighted at the work area such as Office, Workshop, and store area.

In the field, first aid kit were found to be with the spraying ( Mdr Muhmar ), harvesting ( Mdr Syamsul ) and manuring mandore( Mdr Hasmah ). The first aid kit was also sighted in the workshop.

All accidents are well documented and recorded in JKKP 6 and JKKP 8 which submitted to DOSH yearly.

Training for first aider was sighted in their training programme

## 4.7.6 All workers shall be provided with medical care, and covered by accident insurance.

Minor

**Findings** 

In compliance: Yes: x No:

#### Objective evidence:

There evidence that all workers are provided with medical care (refer to Criterion 6.5.3), and covered by accident insurance by the company.

Valid FWCS insurance policy sighted :

- 1) S/17/WF00/012513/SDK-22
- 2) S/17/WF00/012521/SDK-22

	Total insurance	Active workers	Non-active
GMWE	328	313	15
GLKE	115	110	5

Workers who came back from their leave were also added into the list.

There was 1 worker who passed away due to suspected Asthma in 11/1/17 . The police report was sighted .

Name of worker: Yusuf Bakkarang (DOB 1965)

Evidence of insurance submission for claim was sighted submitted on 20/2/17. Similarly submission to JKKP was also sighted, evidence of 'diterima' by JKKP on 16/2/17

For the GMOM, the policy No. S/17/WF00/012526/SDK-22 was sighted for the insurance cover for 78 foreign workers.

GMOM has also submitted to HR Department on 29/3/17 list of 9 workers that were not listed in the policy above as the documents for renewal was not available during the insurance process submission.

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For local workers they are covered under the SOCSO Scheme.

GMOM uses the same Hospital Assistant as the Estate.

For emergency that require hospital care, GMOM will provide transport to the nearest hospital at Kinabatangan

Interview with the Hospital Assistant indicated that Genting Mewah management has provided sufficient medical supplies to run the clinic.

Interview with workers also confirm that the clinic is sufficient to meet their needs when necessary.

During the audit, the clinic was undergoing some renovation to improve it's facilities.

At the mill, the audiometric report for 2016 was sighted. Based on the DAB OH Sdn Bhd report conducted by Dr Azizan b Abdul Aziz on 2/6/16, there were 17 mill workers who were tested. The results show that 10 workers had normal hearing and 7 had mild to moderate hearing impairment. These workers will be included in the following year's audiometric test.

During the site visit the signage for area with 90dB was posted at the engine room as per the noise mapping ( marked red ) .

The area surrounding like the Oil room and the Boiler house was also marked yellow where the noise level is 80-90dB(A)

In addition, warning signages, reminding personnel to wear the ear muff was also posted at the entrance into the engine room.

# 4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.

Minor

Findings In

In compliance: Yes: X No:

## Objective evidence:

a. Are occupational injuries recorded using Lost Time Accident (LTA) metrics?

All occupational accidents are reported monthly in the 'Monthly Occupational Accident Report' . As end of December 2016 the year to date lost mandays reported is 6 lost mandays.

Occupational injuries are recorded in the annual submission of the JKKP 8 submitted on 9/1/17. Based on the report the following was reported in the JKKP 8

	GMWE ( 9/1/17 )	GMOM (5/1/17)
Fatality rate / Kadar Kematian	0	0
Incident rate/ Kadar Kejadian	7	0
Frequency rate/Kadar	3	0
Kekerapan		
Severity Rate/Kadar	4	0
Keterukan		

There were no JKKP 6 submission as there no injuries that requires > 4 days medical leave.

#### Criterion 4.8: All staffs, workers, smallholders and contract workers are appropriately trained.

4.8.1 A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme.

Major

**Findings** 

In compliance:

Yes:

X No:

## Objective evidence:

- a. Does the company maintain a list of staff, workers, smallholders and contract workers whom training must be provided to?
- b. Is there a formal training programme in place that covers all aspects of the RSPO Principles and Criteria? Does the formal training program include:
- Regular assessment of training needs of all staff, workers, smallholders and contract workers:
- Training for workers on smallholder plots;
- Documentation of all the training assessment needs, formal training conducted and the list

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of participants attending these formal training;

- Does the training for workers cover, at minimum, to the following:
- The health and environmental risks of pesticide exposure;
- o recognition of acute and long-term exposure symptoms including the most vulnerable groups (e.g. young workers, pregnant women);
- o ways to minimise exposure to workers and their families;
- o International and national instruments or regulations that protect workers' health; and
- o Productivity and best management practice.

Note to auditor: To interview staff, workers, smallholders and contract workers to verify that the training has been conducted effectively.

Formal training program for the year 2017 prepared in OSH Secretary, HA Mr Laminin for the new financial year. The training program covers all aspects of RSPO P&C including supply chain and traceability. Program for the 2017 have been implemented. Regular assessment of on-the-job training conducted to ensure understanding among the employees

#### 4.8.2 Records of training for each employee shall be maintained.

Minor

Findings
Objective

In compliance:

Yes:

No:

#### Objective evidence:

Training records are maintained for each employee.

Records of training attended by each worker is available in the individual files.

Χ

The training attended by Nurkayah Mappe was sighted . GMWE records the training in a yearly basis .

	No. of training attended
2014	6
2015	0
2016	4
2017	4

The training evaluation forms were also available however it was noted that the evaluation form was not on the work operation understanding and competency .

At GMOM, records of evaluation after training conducted is sighted .

The HIRARC – FFB Grading station dated 9/2/17 for 9 FFB Graders was sighted .

Although the trainer has 'passed' some of the participants who attended the other training however based on the evaluation form for the sampled training, they have not been 'certified passed' by the trainer.

#### MINOR 02

Records of the worker competency records for the staff were also sighted.

The following are the list of names and their valid competency for authorised entrant and standby person for confined space ( AESP ) , Authorised Gas Tester ( AGT ) , Engine Pembakaran Dalam ( IPD )

Name Type of competency		Position
Herman Mojiun	AESP & AGT, First Aider	Mill Engineer
Julius Kalapah	AESP & Engine Pembakaran Dalam (IPD), Steam Cert Grade I, First Aider	Boiler man
Abbas	AESP	Production Executive
Arshad Sinring	Engine Pembakaran Dalam ( IPD )	Engine Driver

Ezmuliadi Ahmad	Steam Cert Grade II	Boilerman
Muhammad Azim	Certified Environment Professional in Treatment of Palm oil Effluent – Pond processes ( CEEPOME )	Acting Mill manager
Muhammad Azim ( attending next month)	Certified Environment Professional in Scheduled Waste Management (CePSWaM)	Acting Mill manager
Aini bt Kabih	First Aider	Operator
Separman Separang	First Aider	Lab conductor
Amboassea hf Bado	First Aider	Mandore Process
Md Yusuf Lalang	First Aider	Acting Foreman

Principle 5	: Environmental Responsibility and Conservation of Natural Resources and Biod	liversity			
environme	Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.				
5.1.1	An environmental impact assessment (EIA) shall be documented.	Major			
Findings	In compliance: Yes: X No:				
Objective evidence:	GMWE has documented the environment aspect impact assessment. The assessment covered:  a. Section/location, b. Activities/products services, c. Environmental aspect, d. Applicable legal and requirements e. Environmental impact f. Mitigation plan- control measures  The assessment has documented various activities such as: a. Herbicides spraying b. Manuring c. Harvesting/Pruning d. EFB Mulching and decanter cake application e. Oil Palm thinning f. Chemical receiving and storage and etc.  Each of the activities with significant risk will link with the respective mitigation plan. Similar Environmental aspect and impact register (doc no: SP-MGR-02-F01-0; rev: 04 for GMOM)				
5.1.2	is available.  Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive action plan. The action plan shall identify the responsible person/persons.				
Findings	In compliance: Yes: X No:				
Objective evidence:	Environmental Improvement & management plan were defined and implemented for ensuring that negative environmental impacts were prevented and mitigated. The plan cover the source, negative impacts, improvement/mitigation plan, data required, monitoring & action plan, PIC/timeline and status/remark.				
5.1.3	Each action plan will be managed by the assistant manager.  This plan shall incorporate a monitoring protocol, adaptive to operational	Minor			
5.1.5	changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.				
Findings	In compliance: Yes: X No:				

Objective	An environmenta	al Improvement & r	management plan includes :		
evidence:	Source	Negative Impacts	Improvement/mitigati on plan	Monitoring & Action plan	
	Air quality/Zero	Air pollution	Adhere to zero burning policy	Site inspection	
	Burning		Warning sing and signboard	Training provided	
	Chemical Application	Agrochemical polluting soil and water	Use of alternative chemical that are less harmful to environment Chemical reduction via IPM and best practices	Ensure management to ensure that only chemicals registered for use are purchased for	
	Waste management	Land contamination	Provide adequate rubbish bins for workers to throw their waste	application.  Site inspection  Training provided	
			Recyclable waste store to segregate the waste		
	For GMOM, the monitoring and measurement list (GSOM-F-MGR-08; rev:8) has stated all the key characteristic such as scheduled waste, chemical exposure, first aid kit, safety audit, emission of stack and etc. The list considers has covered all the activities which need to be updated and monitored within certain time period.				
Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.					
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).				
Findings	In compliance:	Yes: X No	:		
Objective evidence:	The HCV assessment conducted back in February- March 2010 by Dr Yap Son Kheong and a team of ecologist and biologist. Inventory of the sites using HCVF Toolkit for Malaysia within the Genting Plantations estates in Sabah to determine the presence of sites with high conservation attributes.		a within the		
	In GMWE follow	ng assessment fin	dings:		
	The flood prone	e sites	HCV 1.4 (Critical temporal ι	use)	
	Riparian Buffer	Zone	HCV 4.2 (Erosion Control)		
	Elephants pass estate ai irregu		HCV 1.1,1.2 and 1.3		
	HCV Map of GM	WE is available du	ring onsite audit.		
	The organization	should involved p	articipation of stakeholders	during HCV assessme	nt.
	OBSERVATION 06				
5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan.			Major	
Findings	In compliance:	Yes: X No	:		
Objective evidence:		at done by the Dr Y with no RTE spec	ap Son Kheong indicated thies presence.	nat only HCV 1.4, HCV	4.2 and HCV
	through the pro		at the estate has recorded y. There were three grou ough area.		

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Observed that the estate has erected the signage to warn the people and the workers of the presence of the elephants in the property. For each of HVC identified, the estate also has carried out the following management measure: HCV 1.1,1.2,1.3 and 1.4 1. Erected warning signage against encroachment of protected area 2. Developed management plan for visiting wildlife 3. Protection of avian fauna HCV 4.2 1. Established appropriate riparian buffer belts There shall be a programme to regularly educate the workforce about the 5.2.3 Minor status of these RTE species, and appropriate disciplinary measures shall be instituted in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. **Findings** In compliance: Yes: Χ No: Objective Estates are doing HCV monitoring assessment based on recommendation of management plan. evidence: There is evidence to continuously prevent and discourage any illegal hunting, fishing or collecting activities via the signage erected. Besides that, management plan also include monitoring activities such signage, training, maintain buffer zone marking and maintaining vegetation at riparian zone every two months. All these activities were documented in HVC areas monitoring checklists. 5.2.4 Where an action plan has been created there shall be ongoing monitoring Minor **Findings** In compliance: Yes: Χ No: Action plans, monitoring and continuous improvement programme were established. Objective evidence: All these activities were documented in HVC areas monitoring checklists. Monitoring is done on monthly basis and auditor satisfy on the monitoring that has been carried out. 5.2.5 Where HCV set-asides with existing rights of local communities have been Minor identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. **Findings** In compliance: Yes: Based on the assessment conducted by desktop, interview and field visits, it was verified that Objective evidence: there has been no instance of HCV set aside that conflicts with cultural identify, basic needs for local communities and critical for water catchments at these estates. GMWE has communicated with the stakeholders about the RSPO, MSPO & ISCC Certification. It includes the topic such as HCV, complaints procedures, social issue and etc. Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner. 5.3.1 All waste products and sources of pollution shall be identified and Major documented. **Findings** In compliance: Yes: Х No: List of wastes products and sources are listed in document namely "Identification, Segregation Objective and Storage of Waste" updated 27 Mar 2017. evidence: Observed that an operational plan for each of the identified waste source is found to be established and implemented as follows: Source **Operational Plan** Schedule waste including Dispose through licensed contractor clinical waste Complete spill kit Schedule waste store Domestic Waste Dispose at designated landfill area (within estate)

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	Recyclable Waste Collection at least once a week		
5.3.2	All chemicals and their containers shall be disposed of responsibly.	Major	
Findings	In compliance: Yes: X No:		
Objective evidence:	All chemical containers has been disposed through the licensed scheduled waste collector i.e. Legenda Bumimas Sdn. Bhd.		
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.	Minor	
Findings	In compliance: Yes: X No:		
Objective evidence:	A waste management plan is documented under document "Waste Management updated annually. "Waste Management Plan" updated 20 Feb 2017 is sighted during	Plan" which the audit.	
	Waste management is carried out according to the following type of wastes:		
	1. Scheduled Wastes		
	2. Domestic Wastes		
	3. Recycled Wastes		
	Implementation of waste management plan is appropriately conducted.		
	For examples:		
	<ol> <li>Disposal of recycled wastes (e.g. used paper) is carried out on 27 Mar 20<sup>-7</sup></li> <li>7.4kg)</li> </ol>	17( quantity :	
	2. Disposal of schedule waste ( e.g. empty chemical ) is carried out on Feb 2017		
	Domestic waste is disposed into designated landfill and observed that at line site domestic waste is separated with recycled wastes.		
Criterion 5.	4: Efficiency of energy use and use of renewable energy is maximized.		
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy shall be in place and monitored.	Minor	
Findings	In compliance: Yes: X No:		
Objective evidence:	Monitoring of diesel usage is carried out on monthly basis. Record is available in "Oil Mill Diesel and Bio-Diesel Consumption Monitoring (Year 2017) updated on monthly basis.		
	Yearly record of diesel monitoring is also available as evidence of diesel monitoring on yearly basis (ref doc: Diesel Consumption Monitoring). Record of diesel usage per tonne FFB processed & CPO produced 2011 to 2016 is seen during the audit with details as below:		
	Year <u>Diesel/FFB processed ( lit/ton)</u>		
	2011 0.66		
	2012 0.84		
	2013 0.82		
	2014 0.84		
	2015 1.18		
	2016 7.26		
	As informed by the Mill Manager, the increasing of diesel usage for 2016 is due to lov FFB for processing. Plan to improve efficiency was in place.	v supply of	
	i.5: Use of fire for preparing land or replanting is avoided, except in specific situa in the ASEAN guidelines or other regional best practice.	tions as	
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003.	Major	
Findings	In compliance: Yes: X No:		
Objective evidence:	Observed during the field visit showed no evidence of open burning on site.		

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	Company provide a policy on prohibition of land burning for land preparation		
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003.	Minor	
Findings	In compliance: Yes: X No:		
Objective	Not applicable.		
evidence:	No evidence of open burning on site during the field visit. Company provide a policy of land burning for land preparation	on prohibition	
	5.6: Plans to reduce pollution and emissions, including greenhouse gases are red and monitored.	e developed,	
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).	Major	
Findings	In compliance: Yes: X No:		
Objective evidence:	Procedures for assessment of polluting activities is described in procedures manual	as below:	
evidence.	<ol> <li>Environmental Aspect and Impact (SP-MGR-02)- updated 01/10/2010</li> <li>Sustainability Management Procedure Manual – Pollution Management (SN updated 02/08/2016</li> </ol>	1P-GPB-31) –	
	Assessment of all polluting activities at the mill has been conducted on annual basis to identify impact to environmental. Latest assessment was conducted on August 2016 that also covering gaseous emissions, particulate/soot emissions and effluent. Results of risk to environment are updated in "Environmental Aspect & Impact Registration". The result showing that risk of gaseous emissions, particulate/soot emissions and effluent have the significant risk to environment.		
	Polluting activities are listed in Section 6.1 "Types of Pollution" in Pollution Management (SMP-GPB-31) document. Types of pollution identified are as below:		
	1. Air Pollution		
	2. Water Pollution 3. Soil or land Pollution		
	4. Noise Pollution		
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimize them implemented.	Major	
Findings	In compliance: Yes: X No:		
Objective evidence:	The scope for GHG monitoring has included GMWE and GMOM. The emission are identified and monitored as stated in the Palm GHG toolEmission sources: land conversion, crop sequestration, fertilizer manufacturer & transport, N2O from fertilizer application, fuel consumption, peat oxidation, POME, Fuel consumption, net emission.		
	The estate also has established the plan to reduce the significant pollutants and gree (GHG	nhouse gas	
	Besides providing PPE to workers , efforts were also made to reduce noise pollution.		
	The workhours in the engine room are at 3 shifts so that the engine driver do not work longer than 8 hours.  In addition, the engine room is 'confined' so that the noise is contained within the room.		
	Both the genset and the turbine within the engine room are roomed in their se section too.		
	All engine room personnel are provided with their individual ear muff and they will use they enter the engine room during operation.	e it whenever	
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.	Minor	
Findings	In compliance: Yes: X No:		
Objective	For the GHG monitoring, GMOM is using Palm GHG calculator provided by RSPO .	Latest Palm	

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evidence:

GHG calculator was submitted to RSPO on 27 Mar 2017.

#### Principle 6: Responsible Consideration of Employees and of Individuals and Communities Affected by **Growers and Mills** Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement. A social impact assessment (SIA) including records of meetings shall be 6.1.1 Major documented. **Findings** In compliance: Yes: Х No: Genting Plantations has conducted the SIA covering Genting Mewah Estate. The report has been Objective prepared on March 2017 by Sustainability Department using outcome from internal and external evidence: stakeholder consultation. The external stakeholder has been conducted on 08 March 2017 and internal stakeholder has been conducted on 22 March 2017. The process in conducting the SIA and the findings has been documented in the SIA report. The SIA acted as the medium for an active impact assessment document where a reasonable amount of consideration has been given to mitigate social impacts for employees and surrounding local communities affected by the plantations and mill. The SIA found has covered all of the potential impact factors at least as below: Access and use rights; Economic livelihoods (e.g. paid employment) and working conditions; Subsistence activities; Cultural and religious values; Health and education facilities; Other community values, resulting from changes such as improved transport /communication or arrival of substantial migrant labour force. Clean water Sundry shop Deduction of wages Genting Mewah Oil Mill (GMOM) has conducted the SIA. The report has been prepared on March 2017 by Sustainability Department using outcome from internal and external stakeholder The external stakeholder consultation has been conducted on 01 March 2017and 08 March 2017 and internal stakeholder has been conducted on 22 March 2017. The process in conducting the SIA and the findings has been documented in the SIA report. The company should include all external stakeholder input from various stakeholders in the SIA report (i.e: Jabatan Hidupan Liar, Jabatan Perhutanan) **OBSERVATION 07** 6.1.2 There shall be evidence that the assessment has been done with the Major participation of affected parties. **Findings** In compliance: Yes: Х No: There is evidence that the assessment has been done with the participation of affected parties. All Objective records of meetings, consultation takes place during the SIA is incorporated in the document. List evidence: of the stakeholders consulted are also available. Observed that the last stakeholder consultation of the SIA was conducted on 08 and 22 Mar 2017 covering both internal and external stakeholder. Interview with DOE, Jabatan Hutan Kinabatangan, Balai Polis Kinabatangan and Jabatan Hidupan Liar has confirmed that mill and estate has invited them prior to stakeholder consultation.

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	However, DOE haven't join any stakeholder meeting conducted by mill and estate.		
	The stakeholder input should involved the significant stakeholder (i.e DOE).		
	OBSERVATION 08		
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.		
Findings	In compliance: Yes: x No:		
Objective evidence:	Social management and Monitoring Plan of Genting Mewah Estate is available with latest update was on 14 <sup>th</sup> March 2017 comprising each Social Aspect (i.e- list of stakeholders workers committee, pay condition, facilities), Management Plan, Status of Plan, Benchmark of each plan, Monitoring Technique and Person in charge for each social aspect and plan.		
	Social Management and Monitoring Plan of Genting Mewah Oil Mill (GMOM) is available with latest update was on 28 <sup>th</sup> March 2017.		
	Observed thru document review found that the plan has outline the plan on mitigation, implementation and monitoring according to the SIA report. The plan has covered the mitigation of negative impacts and promotion of the positive ones including the monitoring of each impact.		
	The documented plan has reasonable timeline and clear timetable prior to types of ac	ctivities.	
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties.	Minor	
Findings	In compliance: Yes: x No:		
Objective evidence:	The plan has been done in March 2017 with consideration of the updates and issues raised by the stakeholders during the meeting conducted with the relevant stakeholders as per stated in Indicator 6.1.2 above.		
	The company has established the Social management Procedure (SMP-GPB-32) to cater all social clause and indicator. The procedure has clearly stated that the social plan shall be reviewed as a minimum once in every two years.  Observed on the plan and records for related activities has confirmed that the plan has been implemented and some of it still in progress status.		
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes	Minor	
Findings	(where the plantation includes such a scheme) In compliance: Yes: x No:		
Objective evidence:	N/A as there are no smallholder schemes.		
	5.2: There are open and transparent methods for communication and consultated and/or millers, local communities and other affected or interested parties.	ion between	
6.2.1	Consultation and communication procedures shall be documented.	Major	
Findings	In compliance: Yes: x No:		
Objective evidence:	Genting Mewah Estate has maintained a list of local communities and other affected/	interested	
evidence.	parties. The list can be gathered in the Folder 47.		
	Genting Mewah has developed the SOP for Consultation and Communication (ref: SI		
	issue date: 11 <sup>th</sup> Oct. 2013). The SOP has incorporated the FPIC approach for commi		
	consultation with the local communities and other affected or interested parties. The SOP can be gathered in English and Malay languages.		
	gathered in English and Malay languages.		

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	estate and mill management. They also mentioned that they can easily communicate with the management on any related issues.			
6.2.2	A management official responsible for these issues shall be nominated.	Minor		
Findings	In compliance: Yes: x No:			
Objective evidence:	The Management has appointed Mr. Mahyaruddin bin Marhaba (Assistant Manager) as responsible person for Social and Risk Management. The Job Description for Assistant Manager is available with Doc no# SMP-GPB-24 with issue date 14 <sup>th</sup> August 2014 has clearly describe the list of responsibility.			
	Ms. Hasniyati Anuar has been appointed as responsible person for Social and Risk Management with assistants, Mr. Blasius Kaka and Mr. Sahid Asmad. The mill organizational chart has been updated on 28 Feb 2017.			
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.	Minor		
Findings	In compliance: Yes: x No:			
Objective evidence:	The list of stakeholders for estate and mill are available during audit.  The estate has included in their plan that the list of stakeholders shall be updated at least once a year. Latest of stakeholder list has been updated on March 2017.  Records of communication are available. These include contractors, smallholders as suppliers, vendors, local community heads, local authority services, government agencies including the list for NGOs and etc.  The company should include social NGO as part of their stakeholder.  OBSERVATION 09  Latest meeting with external stakeholder has been conducted on 16 March 2017. Latest meeting with internal stakeholder has been conducted on 08 March 2017  A minute of the Meeting for both internal and external stakeholders are available and found to be conducted based on the SOP.  Based on internal consultation meeting, no issue has been raised by the workers. Meanwhile, for External Stakeholders, only local village has made a request on road issue and has been tackle by the management.  Mill has conducted both internal and external stakeholder on 01st March 2017. Minute of meeting has been maintained. Based on record and interview with internal and external stakeholder found that no issue has been raised and they are satisfied with current condition and relationship with mill.			
	6.3: There is a mutually agreed and documented system for dealing with cons, which is implemented and accepted by all affected parties.	nplaints and		
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.	Major		
Findings	In compliance: Yes: x No:			
Objective evidence:	The procedures for handling complaints and grievances are outlined in the Complaints and Grievances Procedure (Ref No.: SMP-GPB-19; issue date: 5 <sup>th</sup> Sep. 2014); Negotiation, Compensations and Handling Procedure (Ref# SMP-GPB-18; issue date: 5 <sup>th</sup> Sep. 2014). The procedure specifies the process in receiving and addressing the grievances received from the stakeholders (both internal and external) until the ultimate means in resolving issues.			
	Meetings with external stakeholders and the Complaints/Grievances Record Book ha initiated with the latest was conducted on 13 March 2017.	ve been		
	Interview with internal and external stakeholder found they understood on how the sys	stems work.		

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Training has been provided during Muster Call by the assistant manager. Any complaint received related to workers will be investigate, addressed and resolve by the JCC for both mill and estate. Where there are any gender issue, it will be handling by the Gender Committee. The company has a commitment to keep secrecy of complainant and type of complaint for gender issue and any discrimination issue arises. Where a resolution is not found mutually, there a process for complaint to be brought to the company's RSPO Dispute Settlement Facility 6.3.2 Documentation of both the process by which a dispute was resolved and the Major outcome shall be available. **Findings** In compliance: Yes: No: Objective There are several issue has been arise from both internal and external stakeholder such as evidence: complaint on housing and line-site, safety, transportation facilities, pet and social issue. Stated in the SOP that management shall review and take action within 14 working days from the date of complaint receive SOP (SMP-GPB-19) Check on Complaints/Grievances Record Book (for both internal and external stakeholder) has sample several complaint record: Ref No# **Complaint Date** Action by management 17/10/16 056 20/10/2016 09/11/2016 057 12/11/2016 058 02/02/2017 02/02/17 059 08/02/2017 13/02/2017 060 08/02/2017 13/03/2017 All of the issue raised by both internal and external stakeholder has been address and resolve in an effective, timely and appropriate manner. This documentation has been agreed by interviewed stakeholders. The document can be viewed in the estate and mill office. Criterion 6.4: 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 A procedure for identifying legal, customary or user rights, and a procedure 6.4.1 Major for identifying people entitled to compensation, shall be in place. **Findings** In compliance: Yes: No: Objective A procedure for identifying legal and customary rights and a procedure for identifying people evidence: entitled to compensation are available within the Negotiation, Compensations and Handling Procedure (SMP-GPB-18) is available with issue date 05<sup>th</sup> September 2014. The procedure included the following elements: NCR related land conflicts RSPO DSF (Dispute Settlement Facility) mediation process 6.4.2 A procedure for calculating and distributing fair compensation (monetary or Minor otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and longestablished communities; and differences in ethnic groups' proof of legal versus communal ownership of land. **Findings** In compliance: Yes: No: Objective No dispute received to date.

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#### evidence: However, Genting has developed the Procedure on Negotiation, Compensations and Handling; SMP-GPB-18 with issue date 5<sup>th</sup> September 2014. The procedure has include: 1 Objective 2 Land/Boundary Disputes 3 Squatter Disputes 4 Social issues The procedure found has put into account on following: Gender differences in the power to claim rights; Ownership and access to land: Differences of transmigrants and long-established communities; Differences in ethnic groups' proof of legal versus communal ownership of land. The calculations of compensation were based on case by case basis. 6.4.3 The process and outcome of any negotiated agreements and compensation Major claims shall be documented, with evidence of the participation of affected parties, and made publicly available. **Findings** In compliance: Yes: X No. Objective This Unit do not have any customary rights issues with the local communities. evidence: Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages. Documentation of pay and conditions shall be available. 6.5.1 Major **Findings** In compliance: Yes: Х No: Objective Most of Genting Mewah Estate's workers are paid on daily basis with some of them piece rate evidence: (harvester) and monthly basis. Both mill and estate has prepared documentation of pay and conditions for each employee. Based on records, the payment is conducted on 06<sup>th</sup> (mill) and 07<sup>th</sup> (estate) monthly for workers while staff was on 28th of each month. Check on estate's and mill's payslip for both local and migrant workers for month of December 2016, January and February 2017 (i.e. ID- E02098, P00130, E03390, E01357, E02106, E02105, E01307, E02057, E00386, E00019, E00363, E00435, E00328 and ect) found that all workers has been paid with minimum wages RM35.38/ day for daily basis workers and RM920 for monthly basis workers as sets out in the Minimum Wages Order 2016. Observed in sample payslip, no deduction has been made by the company towards most the workers except for local workers prior to EPF and SOCSO. Only two workers have deduction on store as permitted by the JTK but the amount is less than 30% from their salary. Genting Mewah has been permitted by the JTK (Serial No# 11(0216)KBN) dated 28 March 2016 to do a deduction (amount deducted not more than 30% of workers salary) only on: Bayaran Pemprosesan Dokumen Perjalanan (Tidak Termasuk Bayaran Levi, Jaminan Bank, Insuran Pampas Am Pekerja dan Pemeriksaan Kesihatan (GROWARISAN)(travel document processing fee (excluding levy, bank guarantee, General Workers' compensation insurance and medical examination); Bayaran menggantikan peralatan yang rosak, pembelian kerbau untuk tujuan mengangkut buah kelapa sawit (payment replacing damage equipment, purchase of buffalo for the purpose of transporting palm oil); Bayaran Yuran Kelab Rekreasi (leisure club fees); Pembelian barangan runcit (purchased of groceries);

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	- Bayaran Bil Telefon(payment of phone bill)		
	Workers interviewed are aware on deduction of salary that applicable to them. No issue raised by the workers prior to payment.		
6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.		
Findings	In compliance: Yes: x No:		
Objective evidence:	Checked on copy of contract workers (e.g. Nurkaya Kappe) found that the company has clearly detailed the conditions of employment including working hours, deductions, overtime, sickness, holiday entitlement, leave, reasons for dismissal, period of notice, medical, safety, wages, nunukan, responsibilities and etc.		
	The contract has been prepared in Malay language for Indonesian workers and has been explained prior to recruitment. For Philippines workers, the contract will be prepared in English language and will be explain prior to recruitment.		
	Checked on payslip of Gang G09, G01, G19 and G15 found that the payments received by the employee are consistent with the term of the contract and the law. The payment has been made on 6 <sup>th</sup> of each month for mill and 7 <sup>th</sup> of each month for estate workers.		
	There are no cases recorded of breach by the company, or complaint made by employees against the company on unjust pay and conditions.		
	Interview with workers found that they are aware on detail stated in their employment contract (i.e leave, working hour, overtime, deduction of salary, wages and ect.). The estate workers also mentioned that they have been given original employment contract to be kept by themselves.		
	Genting Mewah has been permitted by the JTK (Serial No# 11(0216)KBN) dated 28 March 2016 to do a deduction (not more than 30% of workers salary) only on:		
	- Bayaran Pemprosesan Dokumen Perjalanan (Tidak Termasuk Bayaran Levi, Jaminan Bank, Insuran Pampas Am Pekerja dan Pemeriksaan Kesihatan (GROWARISAN) (travel document processing fee (excluding levy, bank guarantee, General Workers' compensation insurance and medical examination);;		
	<ul> <li>Bayaran menggantikan peralatan yang rosak, pembelian kerbau untuk tujuan mengangkut buah kelapa sawit (payment replacing damage equipment, purchase of buffalo for the purpose of transporting palm oil);</li> </ul>		
	- Bayaran Yuran Kelab Rekreasi (leisure club fees);		
	- Pembelian barangan runcit (purchased of groceries);		
	- Bayaran Bil Telefon (phone bill payment)		
	However, samples of workers payslip for estate and mill found that most of them have no deduction on their payslip.		
6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible (not applicable to smallholders).		
Findings	In compliance: Yes: x No:		
Objective evidence:	Interview with estate workers show that housing is sufficient. Repairs were done as per request from workers. Estate has a budget on housing where the wooden house will be replaced with brick house in stages.		
	Observed, half of the workers have been transferred to brick houses.		
	Site inspection conducted during the audit evidenced that housing compound cleanliness are well maintained, housing structure are solid and have a sound roof. Every family are provided with a house except for the single workers where they will be sharing with other 3-4 single workers.		

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Electricity is provided to the workers.

Free treated water has been provided by the company. Treated water will be used by the workers for cooking and domestic use.

Dustbin is provided for each household to dispose their domestic waste.

There is a sundry shop for the workers to purchase their daily necessities. Workers are also allowed to purchase from outside and the security will not stop them from bringing foodstuff in.

There is a clinic provided by the company with basic facilities to attend for medical services required by the workers and their dependents. The company has appointed one hospital assistant (HA) for the medical services. All medical treatment received by the workers at the clinic will be borne by the company.

Besides housing and basic amenities, the company has also provided schools (HUMANA) for Indonesian children staying in the plantation area. The school is facilitated by 2 teachers appointed by Indonesian Government for primary school level.

Other welfare amenities such as crèche, football field are also available within the production unit.

# 6.5.4 Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and affordable food.

Minor

**Findings** 

In compliance:

es:

No:

## Objective evidence:

The company has provided a comfortable house, treated water supply, electricity, health/clinic, playing area and sundry shop for their workers.

The company has policy on sundry shop pricing. Sundry shop pricing shall not exceed more than 10% of goods' normal price.

Interview with workers found they are happy with the pricing and has adequate access to sufficient and affordable food.

Criterion 6.6: The employer 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.

A published statement in local languages recognising freedom of association

#### shall be available.

Major

#### **Findings**

6.6.1

In compliance:

Yes: x

No:

## Objective evidence:

The company has established the Social Policy dated 22 June 2015 with statement that Genting Plantations shall respect the rights of their employees and workers to join or form legal trade unions of their own choosing and to bargain collectively.

Genting Mewah Estate has established the Joint Consultative Committee (JCC). All employees are encouraged to join the JCC. The representatives for each workers nationality were elected by the workers during muster call.

Appointment letter for representative for each workers nationality/race/gang are available during audit. List of workers' representative were as below (Estate):

Mr. Imran Amrullah Bin Ahmad Hasin - Indonesian Bugis

Mr. Paulus Bin Saleh - Indonesian Timur

Mr. Hery Sarunia Nasir - The Philippines

Mr. Pradeep Sah - Nepal

The JCC Chart has been displayed on the board and housing area for workers awareness especially to those who did not attend during election process.

Mill:

Workers Committee Chart dated 01 January 2017 is available. List of representative for workers were as below:

Mr. Gatri Kassim - Indonesian/Bugis

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	Mr. Samri Patangaih – Indonesian/Bugis		
	Pn. Nadirah Laggi – Indonesian/Bugis		
	Mr. Latif Muhammad- Indonesian/Bugis		
	Mr. Maming Giling – Indonesian/Bugis		
	Mr. Arsad Sinring –Indonesian/Bugis		
	Mr. Alex Tenajora – The Philippines		
	Mr. Ronie Bukku – Indonesian/Tator		
	Pn. Juslina – Malaysia		
	Mr. Abd Halim - Malaysia		
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented.	Minor	
Findings	In compliance: Yes: x No:		
Objective evidence:	Minutes of meetings between the estate management with workers association has been conducted on 18 <sup>th</sup> January 2017, and previously was on 16 <sup>th</sup> Sep 2016 covering " <i>Kebajikan</i> , <i>Keselamatan di kawasan Perumahan, Persekitaran Kerja, Masalah Sosial, isu-isu berbangkit</i> , electricity" (Welfare, Safety in Residential Areas, Working environment, social issues, issues arising, electricity).  Copies of minute of meeting have been given to attendees. Interview with clerk has mentioned		
	that the minute made readily available to employees upon request.		
	Organization Chart wise, the appointment of workers representative (mill and estate) are conducted during Muster Call and has been elected by the workers, which they voting their own representative freely without the influence of the top management of the company. Observed that the election of the workers representative was elected on 03 Jan 2017 and all of the representatives have been officially appointed on 03 January 2017.		
	Mill - Meeting has been conducted on 27 March 2017. Copies has been given to workers		
Criterion 6	5.7: Children are not employed or exploited.		
6.7.1	There shall be documentary evidence that minimum age requirements are	Major	
	met.		
Findings	In compliance: Yes: x No:		
Objective	Genting Mewah has complies to the Sabah Labour Ordinance concerning the employment of workers.  Genting Plantations has clearly stated in their Social Policy dated 22 June 2015 signed by Mr. Yong Chee Kong (President & Chief Operating Officer) that Genting shall not use any child labour Children's rights are respected.		
evidence:	workers.  Genting Plantations has clearly stated in their Social Policy dated 22 June 2015 signer Yong Chee Kong (President & Chief Operating Officer) that Genting shall not use any Children's rights are respected.	ed by Mr. child labour.	
•	workers.  Genting Plantations has clearly stated in their Social Policy dated 22 June 2015 signe Yong Chee Kong (President & Chief Operating Officer) that Genting shall not use any	ed by Mr. child labour.	
evidence:	workers.  Genting Plantations has clearly stated in their Social Policy dated 22 June 2015 signer Yong Chee Kong (President & Chief Operating Officer) that Genting shall not use any Children's rights are respected.  Observed during audit, there were no present of child labour. Check on Employees many children's rights are respected.	ed by Mr. child labour. aster List	
evidence:	workers.  Genting Plantations has clearly stated in their Social Policy dated 22 June 2015 signs Yong Chee Kong (President & Chief Operating Officer) that Genting shall not use any Children's rights are respected.  Observed during audit, there were no present of child labour. Check on Employees mas found the youngest worker was born on 1999 (18 years old).  6.8: Any form of discrimination based on race, caste, national origin, religion	ed by Mr. child labour. aster List	
evidence:  Criterion ( gender, se	workers.  Genting Plantations has clearly stated in their Social Policy dated 22 June 2015 signs Yong Chee Kong (President & Chief Operating Officer) that Genting shall not use any Children's rights are respected.  Observed during audit, there were no present of child labour. Check on Employees m has found the youngest worker was born on 1999 (18 years old).  6.8: Any form of discrimination based on race, caste, national origin, religion exual orientation, union membership, political affiliation or age is prohibited.  A publicly available equal opportunities policy including identification of	ed by Mr. child labour. aster List n, disability,	
Criterion (gender, se	workers.  Genting Plantations has clearly stated in their Social Policy dated 22 June 2015 signer Yong Chee Kong (President & Chief Operating Officer) that Genting shall not use any Children's rights are respected.  Observed during audit, there were no present of child labour. Check on Employees me has found the youngest worker was born on 1999 (18 years old).  6.8: Any form of discrimination based on race, caste, national origin, religion exual orientation, union membership, political affiliation or age is prohibited.  A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.	ed by Mr. child labour. aster List  n, disability,  Major  iminate in based on	
Criterion (gender, se 6.8.1 Findings	workers.  Genting Plantations has clearly stated in their Social Policy dated 22 June 2015 signer Yong Chee Kong (President & Chief Operating Officer) that Genting shall not use any Children's rights are respected.  Observed during audit, there were no present of child labour. Check on Employees me has found the youngest worker was born on 1999 (18 years old).  6.8: Any form of discrimination based on race, caste, national origin, religion exual orientation, union membership, political affiliation or age is prohibited.  A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.  In compliance: Yes: x No:  The Social Policy sets out by the plantation has clearly stated that they shall not discriterm of hiring, compensation, access to training, promotion, termination or retirement race, caste, national origin, religion, age, disability, gender, marital status, union memory.	ed by Mr. child labour. aster List  n, disability,  Major  iminate in based on	
Criterion (gender, se 6.8.1 Findings	workers.  Genting Plantations has clearly stated in their Social Policy dated 22 June 2015 signer Yong Chee Kong (President & Chief Operating Officer) that Genting shall not use any Children's rights are respected.  Observed during audit, there were no present of child labour. Check on Employees me has found the youngest worker was born on 1999 (18 years old).  6.8: Any form of discrimination based on race, caste, national origin, religion exual orientation, union membership, political affiliation or age is prohibited.  A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.  In compliance: Yes: x No:  The Social Policy sets out by the plantation has clearly stated that they shall not discriter of hiring, compensation, access to training, promotion, termination or retirement race, caste, national origin, religion, age, disability, gender, marital status, union mempolitical affiliation.	ed by Mr. child labour. aster List  n, disability,  Major  iminate in based on	
Criterion (gender, se 6.8.1 Findings	workers.  Genting Plantations has clearly stated in their Social Policy dated 22 June 2015 signer Yong Chee Kong (President & Chief Operating Officer) that Genting shall not use any Children's rights are respected.  Observed during audit, there were no present of child labour. Check on Employees make found the youngest worker was born on 1999 (18 years old).  6.8: Any form of discrimination based on race, caste, national origin, religion exual orientation, union membership, political affiliation or age is prohibited.  A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.  In compliance: Yes: x No:  The Social Policy sets out by the plantation has clearly stated that they shall not discriterm of hiring, compensation, access to training, promotion, termination or retirement race, caste, national origin, religion, age, disability, gender, marital status, union mempolitical affiliation.  The policy has found to be posted in the estate's office board, at line-site.	ed by Mr. child labour. aster List  n, disability,  Major  iminate in based on obership or	

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6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against.	Major	
Findings	In compliance: Yes: x No:		
Objective evidence:	Review on payslip has found no evident of wages discrimination. All workers has been paid prior to type of work, skill, experience and achievement.		
	Interview with workers has confirmed that they have been treated equally and fair by the management.		
	No complaints against the company on issues relating to discrimination received to d	ate.	
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.	Minor	
Findings	In compliance: Yes: x No:		
Objective evidence:	The Social Policy sets out by the plantation has clearly stated that they shall not discriminate in term of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.		
	The Social Policy has been reviewed and updated on 2015.		
	The company's employees has been recruited and promoted based on skills, qualities and medical fitness necessary for particular job.	capabilities,	
	Prior to recruitment please refer to 6.12.		
	The company keep and maintain monthly medical check up by HA and Medical Surveillance by HD with retention period 10 years.		
	Some of Occupational Medical Surveillance Programme Records for estate reviewed were i.e: No# 1383, 1367, 8952, 8949, 1366, 1381, 1390, 3145.		
Criterion 6 protected.	6.9: There is no harassment or abuse in the work place, and reproductive rights a	re	
6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce.	Major	
Findings	In compliance: Yes: x No:		
Objective evidence:			
	The plantation also maintained the Sexual Harassment Policy as a way to prevent sexual harassment from occurred.		
	No evidence or practices that contradict with the policy noticed during visit and document review.  Discussion with female staff shows that the company provide fair and just treatment to women.		
	Mill: Training has been given to the workers on 27/03/2017 on 2 session (Muster Call and on 10.30 am) The training has covered briefing on RSPO, Policy related, Recycle, Complaint and grievance procedure, sexual harassment procedure.		
	Awareness training has been conducted on 17 Feb 2017 during Muster Call to the workers. The training has covered all related policy, HIRARC, SOP ( <i>Cara Kerja Selamat</i> ), HCV, Recycle, Complaint procedure and sustainability program by estate management.		
	There a clear protocol for the company to deal/handle such issues/complaints receive workforce. This can be viewed on several procedure established by the company as		
	-Complaints and Grievances Procedure (SMP-GPB-19)		
	-Procedure on Prevention and Eradication of Sexual harassment at The Wo (SMP-GPB-20)	rkplace	
	-Whistleblower policy Guidance -5. Procedure (19 Feb 2013)		
	Gender Committee has been developed in the estates to cater related issue. List of r available during audit (1 August 2016). The Chairman is Pn. Mary Pissin @ Pisin. Th		

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organization chart has included workers representative following Division. The Gender Committee (estate) has conducted several meeting including: Minit mesyuarat Keselamatan dan Kesihatan dated 25/03/2017 - Minit Mesyuarat Ahli Jawatankuasa Wanita & Kanak-kanak Yang Pertama bagi Tahun 2017 dated 06 January 2017 Mill - Carta Organisasi Ahli Jawatankuasa Persatuan Wanita updated on 01 Jan. 2017 chaired by Pn. Juslina Kutik (appointed by pooling method). The member has represented on races and nationality. Meeting has been conducted by the committee on 27 March 2017. The meeting has covered briefing on People Policy and Sexual Harassment Policy as well as discussion on women safety and welfare. 6.9.2 A policy to protect the reproductive rights of all, especially of women, shall Major be implemented and communicated to all levels of the workforce. **Findings** In compliance: Yes: No: Objective In the Social Policy, the company has stated that "Physical abuse or discipline, the threat of evidence: physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Reproductive rights are protected". Awareness training (estate) has been conducted on 17 Feb 2017 during Muster Call to the workers. The training has covered all related policy, Hirarc, SOP ( Cara Kerja Selamat), HCV, Recycle, Complaint procedure and sustainability program. Mill: Training has been given to the workers on 27/03/2017 on 2 session (Muster Call and on 10.30 am) The training has covered briefing on RSPO, Policy related, Recycle, Complaint and grievance procedure, sexual harassment procedure. 6.9.3 A specific grievance mechanism which respects anonymity and protects Minor complainants where requested shall be established, implemented, and communicated to all levels of the workforce. **Findings** In compliance: Yes: No: Х Objective A specific mechanism for dealing with sexual harassment in the form of SOP is available in the evidence: Sustainability Management Procedure Manual (SMP) under Doc No# SMP-GPB-20 Procedure On Prevention And Eradication Of Sexual Harrassment At The Workplace with issue date 11th October 2013. The procedure has comprising 1.0 background 2.0 Sexual harassment Policy 3.0 Definition 4.0 Forms of Sexual Harassment 5.0 What is not considered as sexual harassment 6.0 What to do if Subjected to Sexual Harassment 7.0 If you witness a sexual harassment incident 8.0 Protective and Remedial Measures 9.0 What to do if accused of sexual harassment 10.0Disciplinary rules and penalties The procedure has been communicated during Muster Call dated 17 Feb 2017 (estate). Genting has identified the personnel who will be responsible to receive and manage complaints GP 9405A Page 70 of 90

received from the workforce prior to degree of case severity.

The company also has established the Whistleblower policy and procedure in order to keep the secrecy prior to degree of case severity (i.e grievance against supervisor or estates/mill management).

No grievance received to date.

Mill: Training has been given to the workers on 27/03/2017 on 2 session (Muster Call and on 10.30 am) The training has covered briefing on RSPO, Policy related, Recycle, Complaint and grievance procedure, sexual harassment procedure.

The company has yet to receive any report/complaint of harassment/abuse. The procedure for dealing with such issue has been maintained by the company. The company have a mechanism to handle employment grievances, that respects anonymity and protects complainants where requested - Whistleblower Policy.

The mechanism also found has provided a way for workers to report a grievance against a supervisor to someone other than that supervisor.

Interview with workers found they understood on how to address the related issue if any.

# Criterion 6.10: Growers and millers deal fairly and transparently with smallholders and other local

businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.	Minor	
Findings	In compliance: Yes: x No:		
Objective evidence:	GMOM has posts current and past prices paid for FFB at the weighbridge (the price is on monthly basis). The FFB price is determined using MPOB mechanism. Interview with personnel from Malgreen Progress and Ladang Sri Manis has confirmed that they are happy with the prices.		
	No complaint received by the mill on the FFB price.		
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation).	Major	
Findings	In compliance: Yes: x No:		
Objective evidence:	<ul> <li>The mill has conducted several meeting with their FFB suppliers latest was on 1<sup>st</sup> March 2017. Review on minute of meeting has found that the mill has brief their suppliers on FFB pricing and pricing mechanisms for FFB.</li> <li>The company documenting the transaction using payment voucher on monthly basis</li> <li>Check on payment advice (transaction ref: 509355660100145) has confirm that the payment has been made on 13 Feb 2017 (13 – 15 of each month)</li> <li>Documentation was in soft and hard copy.</li> </ul>		
	The agreement was made on 1 <sup>st</sup> January 2012.		
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.	Minor	
Findings	In compliance: Yes: x No:		
Objective evidence:	Interviewed with Malgreen Progress Sdn Bhd and Ladang Sri Manis has confirmed that they had an agreement with mill and understand the whole content of agreement. Observed during audit has found that all contractual agreements is fair, legal and transparent. Both mill and suppliers has their own copy of agreement.		
6.10.4	Agreed payments shall be made in a timely manner.	Minor	
Findings	In compliance: Yes: x No:		
Objective evidence:	Based on the contract, the payment shall be made on 13 <sup>th</sup> – 15 <sup>th</sup> of each month.  Based on records, the audit team notes that the payment has been made in a timely manner as		

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	per required by the contracts.	
Criterion 6	3.11: Growers and millers contribute to local sustainable development where app	ropriate.
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated.	Minor
Findings	In compliance: Yes: x No:	
Objective evidence:	The management has done some of the CSR to the communities such as:	
	Road Patching for main access of Lokan Villagers	
	Sambutan Hari Buruh (Labor Day Celebrations) on 1 <sup>st</sup> May 2016	
	Sambutan Hari Raya Korban (Eidul Adha Celebration) on 12 Sep 2016	
	Sambutan Maulidur Rasul (Maulidur Rasul Celebration) on 24 Dec 2016	
	Provide transport for workers and staffs' children to school	
	Document review has sighted the CSR activities done by the mill management. The a below:	activities as
	- Station friendly football match on 19/07/2016	
	- Sukaneka Kanak-kanak (children's sports day) on 19/07/2016	
	- Labour Day on 01/05/2016	
	- Donation to workers on their loss	
6.11.2	stakeholders. This can be sighted in the communication book and records from stake consultation and request. Donation to workers on their loss were made as effort and employers to relieve their workers burden and reduce grief.  Where there are scheme smallholders, there shall be evidence that efforts	
	and/or resources have been allocated to improve smallholder productivity.	
Findings	In compliance: Yes: x No:	
Objective evidence:	No smallholder scheme involved.	
Criterion 6	3.12: No forms of forced or trafficked labour are used.	
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used.	Major
Findings	In compliance: Yes: x No:	
Objective evidence:	The Social Policy guidelines (Incorporating the Labour and Human Rights requirem 2015) under Freedom of Association; Forced and Bonded Labour has stated that "Wa a risk of forced or bonded labour practices, the company ensure that it does not use to use such practices".	here there is
	The plantation has appointed licensed outsourcing agency (Agensi Pekerjaan M recruiting the new migrant workers. Most of the migrant workers at the plantatic Indonesia. The Agensi Pekerjaan MNK has collaborated with Indonesian's Age recruiting the new Indonesian workers.	on were from
	Genting has prepared the Demand Letter/ Job Order prior to recruiting new Indone The Demand Letter has include the type of work, working time (8 hours/day, 6 day rate (borongan/pajak)), duration (3 years minimum up to 10 years), paying sys payment, overtime, housing, health facilities, transportation cost (flight cost), contract, name of estates that will be allocate, cost on application of working per wages and ect.	//week, piece tem, date of employment

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The Demand Letter will be agreed by Genting Plantation, Outsourcing agency in Malaysia and Indonesia with acknowledgement of General Consulate of Republic of Indonesia. The employee agreement were in Bahasa Malaysia with details such as type of work, duration, pension age, working area, transfer, workers' responsibilities, Levi & Temporary Work Permit, Wages, Working time, overtime, Rest day, leave, housing, transportation, working equipment, health, medical leave, annual leave, insurance, payment and deduction, working safety, contract ended notice, passport keeping and ect. Passport keeping has been informed earlier during interview of workers. The demand Letter also has sets out the category of workers suit their need (Candidate Criteria). Outsourcing agencies in Malaysia as well as Mr. Hamdan the HR of plantation will go to Indonesia to observed and interview the candidates before agreed to recruiting them. The Demand Letter also has included declaration and agreement that outsourcing agencies cannot charge their future workers any fees prior to recruitment. The agreement also stated that the Plantation shall paid all fees/cost and charges charge by the agencies and prior to transportation and legal document will be bear by the company. No liability will be put under the workers. 6.12.2 Where applicable, it shall be demonstrated that no contract substitution has Minor occurred. **Findings** In compliance: Yes: Objective No evident on contract substitution by the company. Based on records, the workers are found to evidence: be signing one single contract that is established as per in the Sabah Labour Ordinance Chapter 67. The original contract will be kept by the workers, while the copy of contract will be kept by the management. Workers are aware on types of work and payment system prior to recruitment. 6.12.3 Where temporary or foreign workers are employed, a special labour policy Major and procedures shall be established and implemented. **Findings** In compliance: Yes: Х No: Objective No temporary foreign workers are employed. evidence: All foreign workers has to work at least 3 years with the company before the company will sent them back to their country as agreed during recruitment. The Social Policy guidelines (Incorporating the Labour and Human Rights requirements-22 June 2015) under Freedom of Association; Forced and Bonded Labour has stated that "Where there is a risk of forced or bonded labour practices, the company ensure that it does not use or contribute to use such practices". Criterion 6.13: Growers and millers respect human rights 6.13.1 A policy to respect human rights shall be documented and communicated to Major all levels of the workforce and operations (see criteria 1.2 and 2.1) **Findings** In compliance: Yes: Objective Stated in the Social Policy that Genting will respect and support the Universal Declaration of evidence: Human Rights. The policy has been posted at Notice Board at Muster Ground area and office board. Briefing has been conducted during Muster Call prior to communicate the policy to all workers. The briefing has been conducted on 17 Feb. 2017. 6.13.2 As long as children of foreign workers in Sabah and Sawarak are ineligible to Minor attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. **Findings** In compliance: Yes: Х No: Objective Children of employed foreign workers within estate are provided a crèche (for those below school evidence: going age ) as well as education in the Humana School Scheme (for those of school going age) till they are about 12 years old. The Humana School is managed by an NGO. Some children of passport holder workers will continue their education in a nearby Government

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secondary school located at Kota Kinabalu or joined the Community Learning Centre at Seksyen 1. Other children may be sent back to their parent's hometown to continue their studies.

#### **Principle 7: Responsible Development of New Plantings**

Note: This Principles are applicable for new area planted after November 2005

There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005.

Evidence should include historical remote sensing imagery which demonstrates that there has been no conversion of primary forest or any area required to maintain or enhance one or more HCV. Satellite or aerial photographs, land use maps and vegetation maps should be used to inform the HCV assessment.

Where land has been cleared since November 2005, and without a prior and adequate HCV assessment, it will be excluded from the RSPO certification programme until an adequate HCV compensation plan has been developed and accepted by the RSPO.

Criterion 7.1: A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.

7.1.1		environmental impact assessment (SEIA), cipatory methodology including the relevant I be documented.	Major
Findings	In compliance: Yes:	No:	
Objective evidence:	N/A as GMWE do not have a	ny new plantings after November 2005	
7.1.2		planning and operational procedures shall be d to avoid or mitigate identified potential negative	Minor
Findings	In compliance: Yes:	No:	
Objective evidence:	N/A as GMWE do not have a	ny new plantings after November 2005	
7.1.3		cludes an outgrower scheme, the impacts of the ns of the way it is managed shall be given	Minor
Findings	In compliance: Yes:	No:	
Objective evidence:	N/A as GMWE do not have a	ny new plantings after November 2005	
		phic information are used for site planning in the est accrporated into plans and operations.	stablishment
7.2.1		surveys adequate to establish the long-term Im cultivation shall be available and taken into ttions.	Major
Findings	In compliance: Yes:	No:	
Objective evidence:	N/A as GMWE do not have a	ny new plantings after November 2005	
7.2.2		dequate to guide the planning of drainage and nd other infrastructure shall be available and taken perations.	Minor
Findings	In compliance: Yes:	No:	

Criterion 7.3: New plantings since November 2005, have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.

N/A as GMWE do not have any new plantings after November 2005

Objective

evidence:

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	There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).	Major
Findings	In compliance: Yes: No:	
Objective evidence:	N/A as GMWE do not have any new plantings after November 2005	
7.3.2	A comprehensive HCV assessment, including stakeholder consultation, shall be conducted prior to any conversion or new planting. This shall include a land use change analysis to determine changes to the vegetation since November 2005. This analysis shall be used, with proxies, to indicate changes to HCV status.	Major
Findings	In compliance: Yes: No:	
Objective evidence:	N/A as GMWE do not have any new plantings after November 2005	
7.3.3	Dates of land preparation and commencement shall be recorded.	Minor
Findings	In compliance: Yes: No:	
Objective evidence:	N/A as GMWE do not have any new plantings after November 2005	
7.3.4	An action plan shall be developed that describes operational actions consequent to the findings of the HCV assessment, and that references the grower's relevant operational procedures (see Criterion 5.2).	Major
Findings	In compliance: Yes: No:	
Objective evidence:	N/A as GMWE do not have any new plantings after November 2005	
7.3.5	Annual manufactured by affect and as your obtained as your object of the state of t	
1.3.3	Areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2).	Minor
	account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see	Minor
Findings Objective	account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2).	Minor
Findings Objective evidence:	account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2).  In compliance: Yes: No:  N/A as GMWE do not have any new plantings after November 2005  7.4: Extensive planting on steep terrain, and/or on marginal and fragile soils, included.	
Findings Objective evidence: Criterion 7	account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2).  In compliance: Yes: No:  N/A as GMWE do not have any new plantings after November 2005  7.4: Extensive planting on steep terrain, and/or on marginal and fragile soils, included.	
Findings Objective evidence: Criterion 7 is avoided 7.4.1	account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2).  In compliance: Yes: No:  N/A as GMWE do not have any new plantings after November 2005  7.4: Extensive planting on steep terrain, and/or on marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided. All new plantings should not be cultivated on land more than 300m above sea	ıding peat,
Findings Objective evidence: Criterion 7 is avoided 7.4.1 Findings Objective	account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2).  In compliance: Yes: No:  N/A as GMWE do not have any new plantings after November 2005  7.4: Extensive planting on steep terrain, and/or on marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided. All new plantings should not be cultivated on land more than 300m above sea level unless specified by local legislation.	ıding peat,
Findings Objective evidence: Criterion 7 is avoided 7.4.1 Findings Objective	account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2).  In compliance: Yes: No:  N/A as GMWE do not have any new plantings after November 2005  7.4: Extensive planting on steep terrain, and/or on marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided. All new plantings should not be cultivated on land more than 300m above sea level unless specified by local legislation.  In compliance: Yes: No:	ıding peat,
Findings Objective evidence: Criterion 7 is avoided 7.4.1 Findings Objective evidence: 7.4.2	account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2).  In compliance: Yes: No:  N/A as GMWE do not have any new plantings after November 2005  7.4: Extensive planting on steep terrain, and/or on marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided. All new plantings should not be cultivated on land more than 300m above sea level unless specified by local legislation.  In compliance: Yes: No:  N/A as GMWE do not have any new plantings after November 2005  Where limited planting on fragile and marginal soils, including peat, is proposed, plans shall be developed and implemented to protect them without	iding peat,
Findings Objective evidence: Criterion 7 is avoided 7.4.1 Findings Objective evidence: 7.4.2 Findings Objective	account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2).  In compliance: Yes: No:  N/A as GMWE do not have any new plantings after November 2005  7.4: Extensive planting on steep terrain, and/or on marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided. All new plantings should not be cultivated on land more than 300m above sea level unless specified by local legislation.  In compliance: Yes: No:  N/A as GMWE do not have any new plantings after November 2005  Where limited planting on fragile and marginal soils, including peat, is proposed, plans shall be developed and implemented to protect them without incurring adverse impacts.	iding peat,
Findings Objective evidence: Criterion 7 is avoided 7.4.1 Findings Objective evidence: 7.4.2 Findings Objective evidence: Criterion 7 they are contact they are	account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2).  In compliance: Yes: No:  N/A as GMWE do not have any new plantings after November 2005  7.4: Extensive planting on steep terrain, and/or on marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided. All new plantings should not be cultivated on land more than 300m above sea level unless specified by local legislation.  In compliance: Yes: No:  N/A as GMWE do not have any new plantings after November 2005  Where limited planting on fragile and marginal soils, including peat, is proposed, plans shall be developed and implemented to protect them without incurring adverse impacts.  In compliance: Yes: No:	Major  Per rights,

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Findings	In compliance:	Yes:		No:			
Objective evidence:	N/A as GMWE o	lo not ha	ve an	y new	plantir	ngs after November 2005	
7.6.2	A system for id	entifying	peo	ple ent	itled	to compensation shall be in place.	Major
Findings	In compliance:	Yes:		No:			
Objective evidence:	N/A as GMWE o	lo not ha	ve an	y new	plantir	ngs after November 2005	
7.6.3	A system for ca otherwise) shall			distri	buting	g fair compensation (monetary or	Major
Findings	In compliance:	Yes:		No:			
Objective evidence:	N/A as GMWE o	lo not ha	ve an	y new į	plantir	ngs after November 2005	
7.6.4						rights to land for plantation to benefit from plantation	Minor
Findings	In compliance:	Yes:		No:			
Objective evidence:	N/A as GMWE o	lo not ha	ve an	y new į	olantir	ngs after November 2005	
7.6.5	The process an and made publi				ompe	ensation claims shall be documented	Minor
Findings	In compliance:	Yes:		No:			
Objective evidence:	N/A as GMWE o	lo not ha	ve an	y new į	olantir	ngs after November 2005	
7.6.6	enable affected information and	l commu d advice legal, ed	nities that i	s and r is inde mic, er	ights pend viror	npany has made adequate efforts to holders to have access to ent of the project proponent, amental and social implications of the	Minor
Findings	In compliance:	Yes:		No:			
Objective evidence:	N/A as GMWE o	lo not ha	ve an	y new	olantir	ngs after November 2005	
	7.7: No use of fire in the ASEAN gu					w plantings other than in specific situat I best practice.	ions, as
7.7.1	situations, as id	dentified	in th	e 'Gui	deline	urning, other than in specific es for the Implementation of the comparable guidelines in other	Major
Findings	In compliance:	Yes:		No:			
Objective evidence:	N/A as GMWE o	lo not ha	ve an	y new	plantir	ngs after November 2005	
7.7.2	planting, there as specified in	shall be <i>'Guidelii</i>	evide nes fo	ence of or the l	f prio <i>Impl</i> e	e used for preparing land for r approval of the controlled burning <i>mentation of the ASEAN Policy on</i> elines in other regions	Minor
Findings	In compliance:	Yes:		No:			
Objective evidence:	N/A as GMWE o	lo not ha	ve an	y new	olantir	ngs after November 2005	
Criterion 7	'.8: New plantation	on devel	opme	ents ar	e des	igned to minimize net greenhouse gas	emissions.
7.8.1		ssions tl	nat m			opment area and major potential rectly from the development shall be	Major

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Findings	In compliance: Yes: No:									
Objective evidence:	N/A as GMWE do not have any new plantings after November 2005									
7.8.2	There shall be a plan to minimise net GHG emissions which takes into account avoidance of land areas with high carbon stocks and/or sequestration options.  Minor									
Findings	In compliance:	In compliance: Yes: No:								
	N/A as GMWE do not have any new plantings after November 2005									

Duin sints (	and the section of the Continued Insurance and the Kerr Annual of Anti-time							
-	commitment to Continual Improvement in Key Areas of Activity							
	<ul> <li>Growers and millers regularly monitor and review their activitition plans that allow demonstrable continual improvement in key op</li> </ul>							
8.1.1	The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.  As a minimum, these shall include, but are not necessarily be limited to:  Reduction in use of pesticides (Criterion 4.6)							
	Environmental impacts (Criterion 4.3, 5.1 and 5.2)							
	Waste reduction (Criterion 5.3)							
	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7	.8)						
	Social impacts (Criterion 6.1)							
	Encourage optimizing the yield of the supply base.							
Findings	compliance: Yes: x No:	1						
Objective	ne action plan for continual improvement was sighted for GMOM and GM	IWE:						
evidence:	Action plan							
	Environmental impacts Regular monitoring of wa	ater quality						
	Take necessary action we quality is observed	hen poor water						
	Carry out stakeholder me procedure – every 6 mor							
	Briefing to AP and worke	ers						
	Waste reduction Create awareness on re	cycling programme						
	Keep records of any recy for auditing purposes	/clable waste sales						
	Biomass – monitoring of	EFB supply to estate						
	- POME land applica	tion						
	- Decanter cake applicat	ion						
	Pollution and greenhouse gas (GHG)  Annual review of plan							
	emissions Execution based on plan	I						
	Necessary repairs on ve	hicles						
	Maintenance checklist							

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Social impacts	Stakeholder meeting – issues, recommendation – set targets, keep re periodic review of performance
	Carry out interior and exterior painting worker quarters
	Improvement and repair works – drain skirting, doors, porch, ventilation bricks windows, mosquito netting, roofing
Mechanism to capture the performance and expenditure in environment and social aspect	Record keeping , monitoring of expend the above aspects
Workers personal file	Update, monitor full availability of work document
Water consumption and water quality	Refer to water management plan
	Regular maintenance to minimise leaka
	Consumption record
	Regular quality monitoring
	Trend the consumption and quality

## 3.1.2 Supply Module E used

For supply chain, the **Genting Plantations Berhad - Genting Mewah Oil Mill** has decided to use **[Module E]** in this assessment. The findings and objective evidence find during the assessment are outlined in the table below. The results for each indicator from each of the operational areas were evaluated to provide an assessment of conformity. A statement is provided for each of the RSPO indicators in order to support the findings of the assessment team.

# Module D - CPO Mills: Identity Preserved

Not applicable.

Module E - CPO Mills: Mass Balance

Module E - CPO Mills: Mass Balance							
E.1: Defini	E.1: Definition						
E.1.1	Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.						
E.2: Expla	E.2: Explanation						
E.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.						
Findings	In compliance:	Yes:	х	No:			
Objective evidence:	Not applicable as this is a main assessment.  However in the public summary, the estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of						

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	the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced will be recorded in each subsequent annual surveillance report.							
E.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).							
Findings	In compliance: Yes: x No:							
Objective evidence:	Upon certified , GMOM will register under the RSPO IT platform							
E.3: Docui	mented Procedures							
E.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:							
	a) Complete and up to date procedures covering the implementation of all the elements in these requirements;							
	b) 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 site's procedures for the implementation of this standard.							
Findings	In compliance: Yes: x No:							
Objective evidence:	In the Sustainability Management Procedure, a document known as SMP-GPB-23 dated 21/1 title: supply Chain, Traceability and Mass Balance to manage the implementation of all the elements in the requirements.	1/14						
	It includes:							
	1) Objectives							
	2) Scope							
	3) Definition							
	4) References							
	5) Relevant Records							
	6) Appendix							
	7) Procedure Details							
	8) Unique Batch Number							
	9) Mass Blance (MB ) supply chain Model							
	10) Training							
	11) Appointment of responsible person							
	Under 11, the mill manager will appoint the responsible employee to implement and maintain Supply Chain and Traceability System.	the						
	The appointment letter of Ms Juslina Kutik, Chief clerk was sighted during the audit .							
	She was appointed on 16/2/17							
E.3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.  MAJO	R						
Findings	In compliance: Yes: x No:							
Objective evidence:	In the section 7.0 Procedure Details , under 7.1 the weighbridge Operator will ensure that the of RSPO certified FFB are stamped with the valid RSPO/MSPO stamp	DN						
E.4: Purch	pasing and goods in							
E.4.1	The site shall verify and document the volumes of certified and non-certified FFBs received.	)R						

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Findings	In compliance:	Yes:	Х	No:					
Objective evidence:	All certified FFB will be stamped and non-certified FFB will not be stamped.								
E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.  MAJOR								
Findings	In compliance:	Yes:	х	No:					
Objective evidence:	In the appointment letter of the person in charge of supply chain , Traceability and Mass Balance, it is stated that the person-in-charge, Ms Juslina Kutik , Chief clerk will inform the CB immediately if there is a projected overproduction of certified tonnage.								
E.5: Recor	d keeping								
E.5.1	a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.  b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by								
	stock can in	clude pro ed to sell	duct short	ordered .(ie pro	d for d	e sales from a positive stock. Positive delivery within three months. However, a can be sold before it is in stock.)			
Findings	In compliance:	Yes:	х	No:					
Objective evidence:	GMOM has established a monthly Mass Balance worksheet to record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.  The worksheet will also monitor the ISCC dispatch. Sales of ISCC CPO will be deducted from the amount of sustainable CPO.								
	<ul> <li>a. The documents and records available such as: <ol> <li>i. Estate's Dispatch Note</li> <li>ii. Estate's FFB Dispatch Advice</li> <li>iii. Authorization Form</li> <li>iv. Mass Balance Worksheet- Monthly Input</li> <li>v. Local Sales Delivery Advice</li> <li>vi. Incoming FFB records</li> <li>vii. Outgoing CPO records</li> <li>viii. Outgoing PK records</li> </ol> </li> <li>b. The volume of PO and PKO are based on the OER reported in the daily production report. It will verify during the next surveillance.</li> </ul>								
	-					fied during next surveillance audit.			
E.5.2	In cases where a mill outsources activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.								
Findings	In compliance:	Yes:	х	No:					
Objective evidence:	GMOM will only sell the palm kernel.								

## 3.2 Corrective Action Request

There are total of **0 Major** and **02 Minor** raised. Please refer to the **Appendix A** for the details findings and relevant correction actions have been taken.

## 3.3 Noteworthy Positive Components

Good field agricultural practices are sighted in the field. Similarly good milling practices are sighted.

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Occupational safety measures are practiced.

Documents are available and complete however personnel need to be aware in term of compliance to RSPO requirements and ensure the correct file / documents are presented to the auditors.

Diligent and hard working staffs were present during audit.

### 3.4 Status of Non-Conformities Previously Identified

Please refer to **Appendix B** for the previous audit. Not applicable as this is an initial assessment

## 3.5 Issues Raised by Stakeholders and Findings

A list of stakeholders contacted with detail issue raised is included as **Appendix D**.

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#### 4. ACKNOWLEDGEMENT OF ORGANIZATION INTERNAL RESPONSIBILITY

#### 4.1 Conclusion

The audit team concludes that the organization  $\boxtimes$  has  $\square$  has not established and maintained its management system in line with the RSPO P&C and Supply Chain requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.

#### 4.2 Date of Next Surveillance Visit

The next surveillance audit is planned between 9 month and 12 month of its certificate anniversary.

### 4.3 Date of Closing Non-Conformities

Reference Number	Category (Major/Minor)	Issued date	Close out date	
m01 (4.4.1)	Minor	31 Mar 2017	Open	
m02 (4.8.2)	Minor	31 Mar 2017	Open	

#### 4.4 Acknowledgement of Internal Responsibility and Formal Sign-off Assessment Findings

PT SGS Indonesia and Client acknowledge and confirms acceptance of the Report contents and including the assessment findings. PT SGS Indonesia and Client accept the responsibility for addressing the opportunities of improvement detailed in this report.

Signed on behalf of Genting Plantations Berhad - Genting Mewah Oil Mill	Signed on behalf of PT SGS Indonesia
Name: Mr Ngui Chee Keong,	2017
Position: VP/GM-Plantation	Name: James S H Ong
Date: 23///2012	Position: Lead Auditor
10/10/7	Date: 21/6/17

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# APPENDIX A: CORRECTIVE ACTION REQUEST & OBSERVATION

CAR#	Indicator	CAR Detail						
4.4.1	'm01	Date Recorded>	31/3/1/   Due Dates   Next surv   Date Closeds   dd mm yy					
		Normative reference and requirements:						
		An implemente	d water mana	gement plan	shall be in p	lace.		
		Statement of Nor	n-Conformance:					
		Some paramet	ers did not c	omply with	the Drinking	Water Quality St	andard	
		Objective Eviden	ce:					
			er the Div 4 ar	nalysis in Feb		vithin the Drinking at the pH value wa		
		Similarly the Dividetected.	/ 1 analysis sh	now that Faed	cal coliform ar	nd E.coli of 20 MPI	N/100 ml was	
						chase of chlorinat et to make a ded		
		Analysis of treat	ed water was r	not included in	n the water ma	anagement plan of	GMWE	
		Root cause analy	sis to be comp	leted by Organ	nization:			
		Lack of monitoring and understanding on water quality analysis indicator results						
		Corrective Action to be completed by Organization:						
		GMWE will consult the soda ash pump supplier, (Sawi-Pac Sdn.Bhd) to check the pump's calibration ratio to ensure the PH value complies with the parameter of the required water quality standard. GMWE had received 3 quotations from suppliers on the chlorine pump (Attachment 1) which will be installed once approved.						
		Preventative Acti	on to be compl	eted by Organ	ization:			
		adequate. GMW debris or overgre to carry out more water treatment	E to carry out owth of plant o rainwater har operator and p	periodic clear r algae. To in rvesting where person in chai	ning of the wat crease awarer e possible. Pro ge to increase	d to ensure the buff er catchment pond ness on importance ovide regular trainir e their awareness a lts and the mitigatio	from any of water and ng to the and	
		Close-out eviden	ce/Planned Act	ions to be con	npleted by Lead	d assessor:		
		The above root of accepted. This v				ention action plan เ าce.	was	
4.8.2 'm02 Date Recorded> 31/3/17 Due Date> Next surv Date					Date Closed>	dd mm yy		
		Normative refere	nce and require	ements:				
	Records of training for each employee shall be maintained.  Statement of Non-Conformance:  Evaluation form do not evaluate the understanding and competency  Objective Evidence:							

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CAR#	Indicator	CAR Detail
		The training evaluation forms were also available however it was noted that the evaluation form was not on the work operation understanding and competency.
		At GMOM, records of evaluation after training conducted is sighted.
		The HIRARC – FFB Grading station dated 9/2/17 for 9 FFB Graders was sighted .
		Although the trainer has 'passed' some of the participants who attended the other training however based on the evaluation form for the sampled training, they have not been 'certified passed' by the trainer.
		Root cause analysis to be completed by Organization:
		The existing training evaluation is too general and does not include the technical understanding of the scope of work and safety aspects.
		Some of the training evaluation forms did not assess the competency of the respective trainee.
		Corrective Action to be completed by Organization:
		To enhance the training evaluation forms by including section on technical understanding on the training subject.
		To re-train the affected workers and to ensure that all workers' understanding and competencies are adequately assessed before and after each training in the future.
		Preventative Action to be completed by Organization:
		GMOM carried out a meeting and conducted a training session with all section heads regarding the new training evaluation and assessment requirements.
		To review and keep track of workers' performance and competency on an annual basis. The evaluation process is communicated with the workers to identify whether the workers can achieve the standards and goals expected from them and what they will have to achieve during the year to receive a positive evaluation.
		Close-out evidence/Planned Actions to be completed by Lead assessor:
		The above root cause analysis, corrective action and prevention action plan was accepted. This will be further verified during next surveillance.

## **OBSERVATIONS**

OBS#	Indicator	Observation								
01	1.1.1	Date Recorded>	31/3/17	Due Date>	dd mm yy	Date Closed>	dd mm yy			
		Details:	Details:							
		The organization should established verification procedure and conduct verification of stakeholders to ensure that all stakeholders are covered in list of stakeholder.								
OBS#	Indicator	Observation								
02	2.2.2	Date Recorded>	Date Recorded> 31/3/17 Due Date> dd mm yy Date Closed> dd mm yy							
		Details:  The organization should maintain a record of GPS coordinate for all boundary markers to ensure that the location of boundary markers available are under controlled at all times.								
03	4.6.1	Date Recorded>	31/3/17	Due Date>	dd mm yy	Date Closed>	dd mm yy			

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OBS#	Indicator	Observation					
		Details:	Details:				
		However they have not included the transferred chemicals such as Kenlate and Pestac into the justification list.					
OBS#	Indicator		Observation				
04	4.6.5	Date Recorded>	31/3/17	Due Date>	dd mm yy	Date Closed>	dd mm yy
		Details:					
		MSDS is availab the MSDS of the				as well at the clini ilable	c. However
05	4.6.6	Date Recorded>	31/3/17	Due Date>	dd mm yy	Date Closed>	dd mm yy
		Details:					
		Spill kit using sand as the absorbing material was not sighted at the store but placed at the site outside the store.				placed at	
OBS#	Indicator			Obse	ervation		
06	5.2.1	Date Recorded>	31/3/17	Due Date>	dd mm yy	Date Closed>	dd mm yy
		Details:					
							,,
		The organization	should involve	ed participatio	on of stakehold	ers during HCV as	sessment.
07	6.1.1	The organization  Date Recorded>	should involve	ed participatio	on of stakehold	ers during HCV as	sessment.
07	6.1.1	_				-	
07	6.1.1	Date Recorded>  Details:	31/3/17 ould include a	Due Date>	dd mm yy	Date Closed>	dd mm yy
07	6.1.1	Date Recorded>  Details:  The company sh	31/3/17 ould include a	Due Date>	dd mm yy	Date Closed>	dd mm yy
		Date Recorded> Details: The company sh SIA report (i.e: J	31/3/17 ould include a abatan Hidupa	Due Date>	dd mm yy keholder input an Perhutanan)	Date Closed> from various stake	dd mm yy holders in the
		Date Recorded>  Details:  The company sh SIA report (i.e: Judge Details:  Details:	31/3/17 ould include a abatan Hidupa 31/3/17	Due Date>	dd mm yy keholder input an Perhutanan dd mm yy	Date Closed> from various stake	dd mm yy holders in the dd mm yy
		Date Recorded>  Details:  The company sh SIA report (i.e: Judge Details:  Details:	31/3/17 ould include a abatan Hidupa 31/3/17	Due Date>	dd mm yy keholder input an Perhutanan dd mm yy	Date Closed> from various stake Date Closed>	dd mm yy holders in the dd mm yy
08	6.1.2	Date Recorded>  Details:  The company sh SIA report (i.e: J. Date Recorded>  Details:  The stakeholder	31/3/17  ould include a abatan Hidupa 31/3/17  meeting shoul	Due Date>	dd mm yy keholder input an Perhutanan) dd mm yy	Date Closed> from various stake Date Closed>	dd mm yy holders in the dd mm yy

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# APPENDIX B: NON-CONFORMITIES PREVIOUSLY IDENTIFIED

Not applicable as this is an initial audit

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# APPENDIX C: TIMEBOUND PLAN

Time Bound Plan for RSPO Certification for Genting Plantations Berhad

Prepared by: Sustainability Dept

Date: May 2017

No	Name of the Estate and Mil	İs	TBP for certificat ion	Status as Jan 2017	Any unresolved (Labour Disputes/Land conflicts/Legal Non- Compliance etc.)
1	Genting Sri Gading Estate, Johor,Malaysia	Supply base for Genting Ayer Item	Dec,2014	Certified	None
2	Genting Sungei Rayat Estate,Johor,Malaysia	Oil Mill, Johor, Malaysia  Dec, 2014  Dec,2014  Dec,2015			
3	Genting Kulai Besar Estate, Johor, Malaysia		Dec,2014		
4	Genting Tanah Merah Estate, Johor, Malaysia		Dec,2015		
5	Genting Tebong Estate, Melaka, Malaysia		July, 2015		None
6	Genting Selama Estate, Kedah, Malaysia		July,2015	Certified	None
7	Genting Sabapalm Estate, Sabah, Malaysia	Supply base for Genting Sabapalm Oil Mill, Sabah, Malaysia	Aug,2015	Certified	None
8	Genting Tanjung Estate, Sabah,Malaysia	Supply base for Genting Tanjung Oil	Aug,2016	Certified	None
9	Genting Tenegang Estate, Sabah,Malaysia	Mill, Sabah, Malaysia	Aug,2016		
10	Genting Layang Estate, Sabah, Malaysia		Aug,2016		
11	Genting Bahagia Estate, Sabah, Malaysia		Aug,2016		
12	Genting Landworthy Estate, Sabah, Malaysia		Aug,2016		
13	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah Oil	April 2018		None
14	Genting Permai Estate, Sabah, Malaysia	Mill, Sabah, Malaysia	April 2018		
15	Genting Kencana Estate, Sabah, Malaysia		April 2018		
16	Genting Jambongan Estate, Sabah,Malaysia	Supply base for Genting Jambongan Oil Mill,Sabah,Malaysia	Oct, 2017		None
17	Genting Sekong Estate, Sabah, Malaysia	Supply base for Genting Trushidup	July,2017		None
18	Genting Suan Lamba Estate, Sabah, Malaysia	Oil Mill, Sabah, Malaysia	July, 2017		

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19	Mulia Estate 1, Kalimantan, Indonesia	Supply base for Mulia Oil Mill,	Oct, 2017	Stage 1 Sept 2016	None
20	Mulia Estate 2, Kalimantan, Indonesia	Kalimantan, Indonesia	Oct, 2017	Stage 1 Sept 2016	None
21	Mulia Estate 3, Kalimantan, Indonesia		Oct, 2017	Stage 1 Sept 2016	None
22	Mulia Estate 4, Kalimantan, Indonesia		Oct, 2017	Stage 1 Sept 2016	None
23	Mulia Estate 5, Kalimantan, Indonesia		Oct, 2017	Stage 1 Sept 2016	None
24	Mulia Estate 6, Kalimantan, Indonesia		Oct, 2017	Stage 1 Sept 2016	None
25	PT SMA Estate 1		Oct, 2017	Stage 1 Sept 2016	None
26	PT SMA Estate 2		Oct, 2017	Stage 1 Sept 2016	None
27	PT SMA Estate 3		Oct, 2017	Stage 1 Sept 2016	None
28	PT SMA Estate 4		Oct, 2017	Stage 1 Sept 2016	None
29	Genting Mewah Estate, Sabah, Malaysia	Supply base for Genting Mewah Oil Mill,Sabah, Malaysia	Mar,2017	Audited	None
30	Genting Lokan Estate, Sabah, Malaysia	Milli,Sabatt, Malaysia	Mar,2017		None
31	Genting Cheng Estate, Melaka, Malaysia		Jan,2018		None
32	Genting Bukit Sembilan Estate, Kedah, Malaysia		July,2017		None
33	Lamunti Barat Estate	Supply base for PT	Oct,2018		None
34	Lamunti Timur Estate I/II	GAL Oil Mill, Kalimantan,	Oct 2018		None
35	Mengkatip Estate I/II	Indonesia	Oct,2018		None
36	Bakuta Estate		Oct,2018		None
37	Plasma Timur/Barat		Oct, 2018		None
38	PT UAI 1/2		Oct, 2020		None
39	Golden Hill Estate I	Supply base for	Oct 2019		None
40	Golden Hill Estate II	Golden Hill Oil Mill, Kalimantan,	Oct 2019		None
41	SP1	Indonesia	Oct 2019		None
42	SP2		Oct 2019		None
43	Diamond Hill Estate	Supply base for KMJ	Oct,2019		None
44	Puroh Estate	· Oil Mill*	Oct, 2019		None
45	Masaha Estate		Oct,2019		None
46	PT CSC	Supply base for CSC Oil Mill*	Oct,2020		None
46	PT SAP Estate 1	Supply base for PT	Oct, 2019		None
47	PT SAP Estate 2	SAP Oil Mill*	Oct,2019		None
48	PT SAP Estate 3		Oct,2019		None

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49	PT SAP Estate 4		Oct,2019	None
50	PT SAP Estate 5		Oct,2019	None
51	PT SAP Estate 6		Oct,2019	None
53	PT AAC 1, 2,3,4		Oct,2019	None
52	PT PALJ	Supply base for PALJ Oil Mill*	Aug,2023	None

**Note**: The above time-bound plan is subject to revision and changes by top management. If any change is made, the Certification Body will be notified before the next audit.

<sup>\*</sup>Oil Mill planned for construction

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# APPENDIX D: LIST OF STAKEHOLDERS CONTACTED

Issue raised by Stakeholder	Company Response	Auditor Findings
No issues raised	-	-

Stakeholder interviewed during audit	Comments	Auditor Findings
DOE, Sandakan	Good communication , no issue on stack emission or discharge issues	Auditor
Worker recruitment company	No issue on migrant workers. No contract substitution. No fees charged to the migrant workers. Agreement between Genting and recruitment company in Malaysia as well agent in particular country is available and clearly define on candidate criteria, job description, payment, leave, deduction of salaries, working time, labour law and etc. Migrant workers will be interviewed by Genting's Human Resources personnel prior to recruitment. Health screening prior to recruitment in workers own country and prior to arrival in Malaysia.	No issues
Harvesters, fertiliser operators, Pesticide operators	Pay is on time, Housing is OK, PPE provided during operation. Passport allowed management to keep.  PPE is provided and replace if faulty	No issues
Ramp workers, Boiler room operator	Housing is OK, Mandore does not use force to correct their mistake. Pay	No issues

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Jabatan Hidupan Liar, Kinabatangan  Jabatan Tenaga Kerja, Kinabatangan	is OK .  PPE is provided and replace if faulty  Good communication. Good relationship. Always help Jabatan Hidupan Liar if there are issue on wildlife encroachment and illegal hunting. No issue.  Good communication. Good relationship. Genting always complies with the	No issues  No issues
Jabatan Perhutanan, Kinabatangan	Law.  Good communication.  Good relationship. Genting helping Jabatan to avoid encroachment and illegal logging	No issues
Balai Polis Kinabatangan	Good communication. Good relationship. No issue.	No issues
JCC	Appointment based on pooling method by workers. Meeting conducted once or twice per month. No big issue on social. Most complain on housing but has been tackled immediately by the management. No sign of discrimination. Workers can easily voice out their need.	No issues
Smallholder	Good communication. Pricing ok. Payment on time. No issue.	No issues
Supplier: Ladang Sri Manis Kemabung, Malgreen Progress Sdn Bhd	Good communication. Price ok. Payment on time. Agreement clear, fair, legal and transparent. Aware on complaint procedure, related policy, calculation of fruit price, RSPO principle. No issue.	No issues