

# MSPO CERTIFICATION SUMMARY REPORT

# GEMINI TRADING CORPORATION SDN. BHD.

RECERTIFICATION 01

Onsite Audit Date: 20/11/2024 - 21/11/2024

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Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Mode of Audit: Onsite

## **Table of Contents**

1.	INTRODUCTION	4
1.1.	Objective	4
1.2.	Scope	4
1.3.	Appointment and qualification of team members	4
2.	METHODOLOGY	8
3.	ORGANISATION INFORMATION	10
3.1.	Production volume	10
3.2.	Planting Program for Each Estate or Division	10
3.3.	Replanting program for each estate or division	11
3.4.	Maps of Estate or Division (s) Location	11
4.	CERTIFICATION ASSESSMENT	13
4.1.	RC 01 Error! Bookmark r	not defined.
4.2.	Stakeholders' Consultation	13
4.3.	Summary of Assessment	15
4.4.	Use of Marks and/or Any Other References to Certification	42
4.5.	Status of Non-Conformities Previously Identified	42
4.6.	Detail of Audit Findings in last audit	42
4.7.	Detail of Onsite Audit Findings Identified during this audit	42
5.	CONCLUSION	43
6.	RECOMMENDATION	44
7.	LIST OF STAKEHOLDERS	45
Distrib	oution / Confidentiality / Rights of ownership / Limitations / Respon	sibilities /
	Audit Objectives	46
Annex	( / Enclosures	46



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Mode of Audit: Onsite

#### **Abbreviations**

CHRA Chemical Health Risk Assessment

CPO Crude Palm Oil

CSR Corporate Social Responsibility

DOE Department of Environment

**EFB** Empty Fruit Bunch

**EIA** Environment Impact Assessment

FFB Fresh Fruit Bunch

GAP Good Agricultural Practice
GPS Global Positioning System

ISCC International Sustainability & Carbon Certification

ISO International Standard Organisation

MSPO Malaysia Sustainable Palm Oil

NC Non Conformity

OSH Occupational Safety and Health

P&C Principle and Criteria

PK Palm Kernel

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment
RSPO Roundtable Sustainable Palm Oil

RTE Rare, Threatened and Endangered Species

SA8000 Social Accountability 8000
SIA Social Impact Assessment
SOP Standard Operating Procedure
WHO World Health Organization
MPOB Malaysian Palm Oil Board

MPOCC Malaysia Palm Oil Certification Council

SDS Safety Data Sheet



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Mode of Audit: Onsite

#### 1. INTRODUCTION

Gemini Trading Corporation Sdn. Bhd. has commissioned TUV NORD (Malaysia) Sdn. Bhd. to conduct a surveillance audit for its oil palm estate according to MS 2530-3:2013 Part 3 General Principles for Oil Palm Plantations and Organised Smallholders.

# 1.1. Objective

The objective of this recertification audit is to assess the estates by an independent certification body with the aim for compliance of the standard.

#### 1.2. Scope

The assessment is based on the documentation established by the Gemini Trading Corporation Sdn Bhd.

The supporting documents are provided to the audit team as well as information received by means of interviews and background investigation.

The documents and information are reviewed against the requirements and criteria based on MS 2530-3:2013 Part 3 General principles for Oil Palm Plantations and Organised Smallholders.

TUV NORD Malaysia has employed a risk-based approach in the audit, focusing on the identification of significant risks and reliability of the assessment and reporting.

The following references are used as part of the assessment; the compliance of the requirements out of the guidelines applied was checked.

- 1. Malaysian Sustainable Palm Oil Part 3: General Principles for Oil Palm Plantations and Organised Smallholders audit guidance;
- 2. Palm Oil Supply Chain Traceability Requirements

# 1.3. Appointment and qualification of team members

The audit team appointed consists of one team leader and one team members. The audit team members contributed to the review of documents, the assessment of the project activity and preparation of the report.

#### Qualification of the Lead Auditor: Ariff Bin Lokman

Requirement	Qualifications
Post-secondary education, college or university diploma / degree in one of the following	Graduate in Plantations Industry and Management.
i) Agriculture;	
ii) Science & Technology (e.g. Environmental Sciences, Life Sciences, Geological Sciences, Natural Sciences,);	
iii) Engineering, Process Technology;	
iv) Energy Management, Quality Management;	
v) Social Sciences and/or Anthropology;	
vi) Business Management; or	



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Requirement	Qualifications	
vii) Other relevant related fields		
At least five (5) years of work experience in the oil palm sector or related field in consultancy / auditing of similar industry or equivalent related to and as necessary for the certification process. (e.g., sustainability, palm oil management; agriculture, ecology; social science)		
Successfully completed MPOCC endorsed lead auditor training	Successfully completed MS 2530 series standards for Lead Auditors.	
Conducted at least three (3) MSPO or equivalent sustainability certification audits as Lead Auditor-in-training with a minimum of fifteen (15) mandays under the supervision of a qualified Lead Auditor for MSPO or equivalent sustainability certification schemes within the last two (2) years.	t Qualified as Lead auditor for MSPO scheme.	
Field working experience in the palm oil sector, or demonstrable equivalent	7 years working experience in oil palm plantation.	
Good Agricultural Practices (GAP) and Integrated Pest Management (IPM), pesticide and fertilizer use		
Successfully completed Quality Management Systems (QMS) ISO9001 standard	Successfully completed IMS ISO 9001 Lead Auditor course.	
Health and safety auditing on the farm and in processing facilities	Successfully completed IMS ISO 45001 Lead Auditor course.	
Or Successfully completed Occupational, Health & Safety Management System ISO 45001 standard		
Workers welfare and social auditing experience	Successfully completed SA 8000 Basic training.	
or		
Successfully attended SA8000 or related social or ethical accountability codes		
Environmental and ecological auditing or experience with organic agriculture.	Successfully completed IMS ISO 14001 Lead Auditor course.	
or		
Successfully completed Environmental Management Systems ISO 14001 standard		
Completed High Conversation Value assessment	Attended and completed the HCV-HCS for producers course.	
Able to communicate in Bahasa Malaysia, English and / or any other local language.	Able to communicate in Bahasa Malaysia and English.	



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Mode of Audit: Onsite

# **Qualification of Team Member(s)**

Requirement	Name of Assessor	Qualification	Compliance
Post-secondary education, college or university diploma / degree in one of the following		Graduate in Plantation Industry and Management	Yes
i) Agriculture;			
ii) Science & Technology (e.g. Environmental Sciences, Life Sciences, Geological Sciences, Natural Sciences,);			
iii) Engineering, Process Technology;			
iv) Energy Management, Quality Management;			
v) Social Sciences and/or Anthropology;			
vi) Business Management; or			
vii) Other relevant related fields			
At least five (5) years of work experience in the oil palm sector or related field in consultancy / auditing of similar industry or equivalent related to and as necessary for the certification process. (e.g., sustainability, palm oil management; agriculture, ecology; social science)		7 years working experience in oil palm plantations.	Yes
Successfully completed MPOCC endorsed lead auditor trainings	Muhammad Khairul Anuar Bin Azizul Hasan	Successfully completed MS2530 series of standards for Lead Auditors.	Yes
Conducted a minimum six (6) on- site audits for a total of at least 20 man-days of audit experience as an auditor-in-training under the direction and guidance of a qualified Lead Auditor for MSPO or equivalent sustainability certification schemes.	Anuar Bin Azizul	Qualified as auditor based on audit log.	Yes
Field working experience in the palm oil sector or demonstrable equivalent		7 years working experience in oil palm plantations.	Yes



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Requirement	Name of Assessor	Qualification	Compliance
Good Agricultural Practices (GAP) and Integrated Pest Management (IPM), pesticide and fertilizer use		7 years working experience in oil palm plantations.	Yes
Successfully completed Quality Management Systems (QMS) ISO9001 standard		Successfully completed ISO 9001:2015 LA course.	Yes
Health and safety auditing of the estate processes and activities  Or  Successfully completed Occupational, Health & Safety Management System ISO 45001 standard	Muhammad Khairul Anuar Bin Azizul Hasan	Successfully completed ISO 45001:2018 Lead Auditor course.	Yes
Workers welfare and social auditing experience or Successfully attended SA8000 or related social or ethical accountability codes	Anuar Bin Azizul Hasan	Successfully completed SA 8000 Basic training	Yes
Environmental and ecological auditing or experience with organic agriculture.  or  Successfully completed Environmental Management Systems ISO 14001 standard		Successfully completed IMS ISO 14001:2015 LA course.	Yes
Completed High Conversation Value assessment	Muhammad Khairul Anuar Bin Azizul Hasan	Attended and completed the HCV-HCS for producers course.	Yes
Able to communicate in Bahasa Malaysia, English and / or any other local language.		Able to communicate in both Bahasa Malaysia and English.	Yes



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Mode of Audit: Onsite

#### 2. METHODOLOGY

The audit approach consists of the following steps:

- Contract review;
- · Appointment of team members;
- Contact client for relevant documentation according to the applicable MSPO standards;
- Audit planning;
- Background investigation, desk review of submitted documents;
- Assessment, inspections, interviews operational personnel, workers, stakeholders contractors; review of documentation;
- Reporting
- Resolution of non-conformance (NC) (if any)
- Draft audit reporting
- Technical review
- Peer review
- Address Peer Review Comments
- Final audit reporting
- Final approval, certification decision and issuance of certificate.

#### **Recertification Audit:**

The recertification audit conducted onsite on 20/11/2024 – 21/11/2024 covering the following activities but not limited to below:

#### Onsite:

- Background investigation
- Review of documentation established but not limited to below
  - o Policies
  - Estate maps
  - Land titles
  - Standard Operating Procedures;
  - Work Flow Charts;
  - Management Plans;
  - Operating licenses and approvals;
  - Operating records;
  - Training records;
  - o Applicable Legislation Documents



Company Name: Gemini Trading Corporation Sdn. Bhd.

Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Mode of Audit: Onsite

Onsite visit, observations and inspection of estates facilities and field activities;

- Interview operation personnel and field workers for understanding of work assigned;
- Reviewed revised and updated documentation established and implemented;
- Reports established;
- Work plans established;
- Stakeholders consultation meeting;
- Review and closed out of non-conformance raised during in last audit;
- Assessment reporting;

#### **On-site Assessment**

The audit of the estates is conducted according to the MS 2530-3:2013 Part 3 General principles for Oil Palm Plantations and Organised Smallholders.

The methodology for collection of objective evidence by means of physical site inspections, observation of tasks and processes, interview workers and operation personnel, interviews of stakeholders, communities, review of documentation and data. Checklists and questionnaires were used to guide the collection of information. The comments made by external stakeholders are taken into account in the assessment.

Gemini Trading Corporation Sdn. Bhd. has only one (1) estate. Therefore, no selection required.

#### Non-conformance:

On the basis of the desk review, evidences presented during the audits as well as from the onsite visits non-conformance (NC) Major, Minor and Opportunity for Improvement (OFI) may be raised during the audit.

Major non-conformance shall be addressed and responded with 60 days from closing date of audit. For minor non-conformances raised and action plan to be submitted within 30 days from closing date of audit for review and acceptance. Implementation of Minor NC will be review and verify in the next audit.



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Mode of Audit: Onsite

#### 3. ORGANISATION INFORMATION

Gemini Trading Corporation Sdn. Bhd is an oil palm plantation company head office located at 1st Floor S8, Taman Anggerrik Mill 7, Jalan Lintas Sibuga, Sandakan, Sabah.

The details of the divisions as below:

Name of Division	Location	Coordinates
Kg Tambuluran	Mile 33, Kudat, Sabah	N 6°48'26" E 116°43'16"
Kg Rampai	Mile 24, Kudat, Sabah	N 6°53'12" E 116°41'40"
Kg Popot Sikuati	Mile 21, Kudat, Sabah	N 6°52'48" E 116°43'35"

#### 3.1. Production volume

Name of Birthian	Area (Ha)		Projected FFB Production (mt)
Name of Division	Total*	Production**	(January to December 2024)
Kg Tambuluran	109.92	106.91	1,425.00
Kg Rampai	80.08	78.51	1,047.00
Kg Popot Sikuati	75.85	72.03	961.00
Total	265.85	257.45	3,433.00

<sup>\*</sup>includes productive and non-productive area (infrastructures, conservation, HCV, housing & office compound use, set aside area etc.)

## 3.2. Planting Program for Each Division

Year / Division	Kg Tambuluran Division	Kg Rampai Division	Kg Popot Sikuati Division
2004	15.33	0.00	4.83
2005	0.00	0.00	17.15
2006	0.00	19.66	13.32
2007	0.00	21.66	0.00
2008	0.00	21.45	0.00
2009	20.02	0.00	0.00
2010	0.00	7.20	0.00
2011	0.00	8.54	0.00
2014	0.00	0.00	4.52
Total Mature	35.35	78.51	39.82
2021	34.55	0	6.96
2022	19.42	0	0

<sup>\*\*</sup>Immature + Mature Area



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Mode of Audit: Onsite

2023	17.59	0	25.25
Total Immature	71.56	0.00	32.21
Total	106.91	78.51	72.03

# 3.3. Replanting program for each divisions

	Plante			
Year of	G1	G2	G3	Total area to be
replanting	Kg Popot Sikuati	Kg Rampai	Kg Tambuluran	replanted (ha)
	Division	Division	Division	
2030	9.01	0.00	15.33	24.34
2031	13.32	19.66	0.00	32.98
2032	0.00	21.66	0.00	21.66
Total	22.33	41.32	15.33	78.98

# 3.4. Maps of Divisions Location



Figure 1: Kg. Tambuluran Division location



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

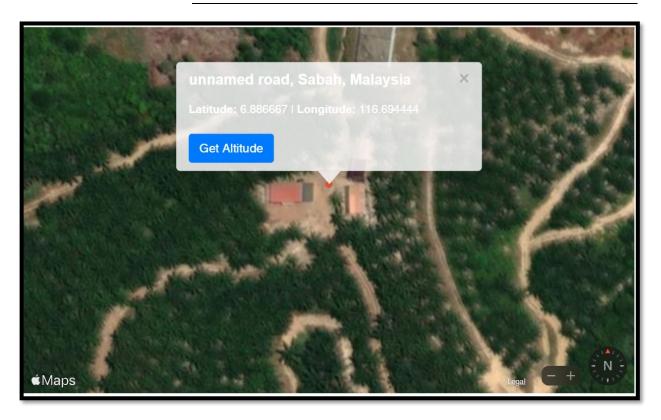


Figure 2: Kg. Rampai Division location

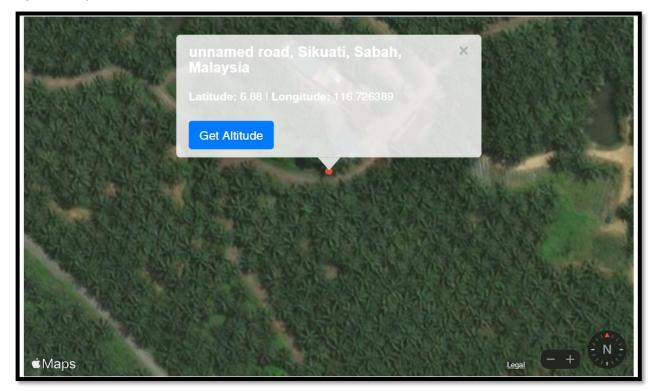


Figure 3: Kg. Popot Sikuati Division location



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Mode of Audit: Onsite

#### 4. CERTIFICATION ASSESSMENT

#### 4.1. RC 01

The objective of the audit is to assess the activities of the estates is in compliance with MS 2530-3:2013 Part 3 General principles for Oil Palm Plantations and Organised Smallholders.

#### 4.1.1. Recertification:

The recertification audit is conducted on 20/11/2024 to 21/11/2024 covering Gemini Trading Corporation Sdn Bhd

During the last last surveillance audit, there are 0 Major, 0 Minor, 2 Opportunities for Improvement (OFI) are raised.

For details of the assessment, refer summary of assessment for each indicator in section 4.3 of this report.

The audit findings if any, raised in this audit refer to Section 4.6 of this report.

#### 4.2. Stakeholders' Consultation

According to ACB – OPMC 4 Issue 2 dated 04/09/2020, Stakeholder Consultation Requirements Section 6: Consultation during audit, §6.1: During the stage 2 and recertification audit of the management unit, the CB shall carry out stakeholder consultation to ensure continued compliance with the requirements of the certification standards. However, stakeholders' consultation during surveillance audit may be limited to those stakeholders who have raised concerns, complaints or disputes prior to the audit.

Invitation letters are sent on 18/10/2024 to invite relevant stakeholders to attend a local stakeholders' consultation on 20/11/2024 to gather information from the local communities in accordance to §7, 3.2 of the Certification Procedure requirements.

The topics of discussion are as below:

- 1. Introduction of MSPO certification.
- 2. Development of oil palm plantations
- 3. Community service and support provided
- 4. Wildlife management and wildlife corridor
- 5. Type of wildlife sighted at the plantations and wildlife corridor.
- 6. Local communities' development.

The following relevant Principles & Criteria of the applied standard are discussed during the stakeholders' consultation:

- 1. Principle 2 Criteria 2 Indicator 1: Consultation and Communication with stakeholders:
  - The stakeholders could confirm they have attended meetings with the company on MSPO certification.
- 2. Principle 4 Criteria 2 Indicator 3 & 4: A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint

The stakeholders' advice they are informed a logbook and form is available at the office to lodge any complaints or suggestions.



Company Name: Gemini Trading Corporation Sdn. Bhd.

Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Mode of Audit: Onsite

3. Principle 4 Criteria 3 Indicator 1: Contribute to local development in consultation with the local communities.

The local communities could confirm the company has provide assistance and support to communities.

4. Principle 6 Criteria 4 Indicator 1: Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information

The contractors who provides maintenance and service could confirm they are briefing on MSPO requirements.

There are no issues raised during the stakeholder's consultation in terms of tenure and/or use rights, social or environmental aspects of management and operations that need to be addressed by the certified unit. It can be concluded the relevant Principles and Criteria clauses of the applied standard are in compliance.

The list of stakeholders who attended the meeting by telephone refer to Table 7-1

Items	Subject discussed	Audit team findings	Company response and proposed action to be taken
1	Any information from Company as regards to the MSPO audit?	Stakeholders informed the MSPO audit through the invitation letter received.	No action required
2	Social issues	No social Issue raised by stakeholders.	No action required
3	Type of land title – Country Leased, Provisional Leased, Native title, Customary Land	Stakeholders interviewed not local communities. Therefore, no input for this topic.	No action required
4	Economy / livelihood  Is there any impact on livelihood after the introduction of MSPO?	Stakeholders informed the Gemini Trading Corporation Sdn Bhd had given business opportunity to local contractors.	No action required
5	Does MSPO largely benefits the local community?	Stakeholders informed MSPO has bring benefits to the local communities especially knowledge of good agricultural practices and legal requirements.	No action required
6	Environmental understanding	Stakeholders informed Gemini Trading Corporation Sdn Bhd provide the environment awareness such as no open burning activities and protection of river & waterways during stakeholders meeting	No action required



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Mode of Audit: Onsite

Items	Subject discussed	Audit team findings	Company response and proposed action to be taken
7	Awareness towards species, habitats, and high conservation values	Stakeholders are aware on the wildlife surrounding the estates. They inform no hunting of any wildlife.	No action required
8	Are there any plantation management practices that affect you?	Stakeholders informed no issue regarding estate management practice that affect them.	No action required
9	Do you consider any management is in conflict with the MSPO principles and criteria?	Stakeholders informed the management had taken effort to meet the MSPO requirements.	No action required
10	Do you have any suggestions for the estate management?	No suggestion made by any stakeholders.	No action required

#### 4.3. Summary of Assessment

# **Principle and Criteria Assessment Summary**

The assessment team conduct a thorough assessment of each principle and criteria. Over the 5 years' period of the certificate cycle, there will be 4 annual surveillance audits with all criterions will be assessed. Evidences are sought for conformity with the MSPO 2530-3. The summary of the assessment as below, where the "Findings/Comments" column reflects the findings in accordance with each indicator or evidences and when non conformity is found. Summary of the non-conformity can be found below in section 4.6.

Principle '	Principle 1: Management Commitment & responsibility		
Indicator	Summary of Assessment	Compliance	
4.1.1.1	Gemini Trading Corporation Sdn. Bhd. (GTCSB) established MSPO Policy on 01/04/2020 updated on 01/04/2024 signed by the Director.	Yes	
	The policy established is available in both Bahasa Malaysia and English languages.		
	Site visit observed policy is displayed at estate notice boards.		
	GTCSB conducted stakeholders meeting includes MSPO policy briefing dated 30/10/2024.		
	Field interviews with sampled chemical sprayers and general workers informed, they are aware of the MSPO policy.		
4.1.1.2	GTCSB established MSPO Policy updated 01/04/2024 signed by Director.	Yes	
	The policy states GTCSB is committed to comply with the requirement of MSPO standards and to strive for continual improvement by harnessing its resources of people, processes and technology in order to ensure the continuous production of oil palm in a sustainable manner.		



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle 1	Principle 1: Management Commitment & responsibility				
Indicator	Summary of Assessment	Compliance			
4.1.2.1	GTCSB established internal audit SOP, document number GT-4.1.2-1, updated on 15/09/2023.	Yes			
	GTCSB conduct internal audit once a year as stated in the internal audit SOP.				
	Internal audit carried out on 04/11/2024 has identified the strong and weak points and the results are reviewed.				
	Example weak point:				
	Some workers still lacking awareness on MSPO.				
	Example strong point:				
	Good documentation and management system established.				
	Good commitment from top management towards MSPO commitment.				
4.1.2.2	GTCSB established internal audit SOP, document number GT-4.1.2-1, updated on 15/09/2023.	Yes			
	Results of internal audit carried out on 04/11/2024 was reviewed.				
	There are no findings raised for the internal audit.				
4.1.2.3	GTCSB conducted management review on 10/11/2024 includes discussion on internal audit results.	Yes			
4.1.3.1	GTCSB conduct once a year of management meeting.	Yes			
	Reviewed the management review meeting minutes dated 10/11/2024.				
	The management review discussed on internal audit findings.				
	No non-conformities raised during the internal audit.				
	External audit findings has been discussed in the management review.				
4.1.4.1	GTCSB established continual improvement plan (CIP) which includes social and environmental and safety and health impact updated on 15/11/2024.	Yes			
	Example:				
	Environment				
	Activity: Road Upkeep;				
	Improvement action: Monitor road condition during raining season.				
	Timeframe: 1 Year;				
	Person In-Charge: Estate Manager;				
	Date completed: 30/10/2025.				
	Site observation during field visit sighted the road condition are in progress of maintenance as raining season has been hit the Sabah region.				



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle 1: Management Commitment & responsibility			
Indicator	Summary of Assessment	Compliance	
4.1.4.2	GTCSB established Identification and Implementation of new procedure and techniques or new industry standards and technology dated 25/04/2019 and updated on 15/09/2023.	Yes	
	At the point of audit, there are no new technology implemented.		
4.1.4.3	GTCSB established Identification and Implementation of new procedure and techniques or new industry standards and technology dated 25/04/2019 and updated on 15/09/2023.	Yes	
	The flowchart indicates necessary resources including the identification of new information or technique, implementation control, budget and training will be provided if applicable, available and feasible for adoption.		
	Site interview with GTCSB Estate Manager, informed there is no new technology currently implemented at the estate.		

Principle 2: Transparency				
Indicator	Summary of Assessment	Compliance		
4.2.1.1	GTCSB established Consultation and Communication flow chart updated 01/04/2024. The procedure includes method of communication with stakeholders.	Yes		
	GTCSB established stakeholders list updated on 01/09/2024 includes government agencies, supplier, neighboring estate and palm oil mill, collecting center and NGOs.			
	Document review on stakeholders meeting minute, the procedure is communicated to internal and external stakeholders dated 30/10/2024.			
	External stakeholders meeting held at Penampang Kota Kinabalu Sabah.			
	There is no negative feedback or request recorded in the meeting minutes.			
	Field interviews with sampled chemical sprayers and general workers informed they have been briefed on the Consultation and Communication flow chart.			
	During site visit observed flowchart displayed at estate notice board.			
4.2.1.2	GTCSB established 'List of Transparency and Information Documents' updated on 15/09/2023.	Yes		
	Reviewed the list of transparency and information document that include the publicly available and confidential documents.			
	Example of documents publicly available:			
	1. MPOB license;			
	2. Trading license.			
	Example of confidential documents are:			
	1. Financial Report;			
	2. Bank Statements;			



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle 2	Principle 2: Transparency				
Indicator	Summary of Assessment	Compliance			
	3. Company budget.	-			
4.2.2.1	GTCSB established Consultation and Communication SOP, Doc. No: GT -4.2.2 dated 22/04/2019 and updated on 01/09/2024.	Yes			
	The communication method as following:				
	Written method / circular;				
	2. Bulletins;				
	3. Meeting;				
	4. Training / talk / briefing;				
	5. Complaint and grievance procedure;				
	6. Stakeholder request and response book (within 14 days).				
	Document review on stakeholders meeting minutes, the procedure is communicated to internal and external stakeholders on 30/10/2024.				
	Field interviews with chemical sprayers and general workers informed, they have been briefed regarding this procedure regularly during daily morning muster.				
4.2.2.2	GTCSB appointed Estate Manager as person in-charge for consultation and communication updated 01/09/2024. The information on appointed person in charge is stated in the SOP.	Yes			
	Reviewed the stakeholders meeting minutes dated 30/10/2024 informed that Estate Manager is the person in charge for communication and consultation.				
4.2.2.3	GTCSB established list of stakeholders updated on 01/09/2024 as follows:	Yes			
	The list of stakeholders includes government agencies, neighboring estates, NGOs, suppliers, local villages, internal stakeholders, contractors and consultants.				
	GTCSB established Consultation and Communication SOP, Doc. No: GT -4.2.2 dated 22/04/2019 and updated on 01/09/2024.				
	The procedure states Estate Manager is in-charge of communication and consultation with stakeholders and the dateline of response to request and complaints is within 14 days.				
	Based on the latest stakeholders' feedback from the stakeholder meeting on 30/10/2024, no negative feedbacks or complaints from respective stakeholders.				
4.2.3.1	GTCSB established SOP for Traceability doc no: GT-4.2.3, dated 22/04/2019 and updated on 01/09/2024.	Yes			
	The flowchart of FFB delivery process describes:				
	Harvesting of FFB in field;				
	FFB loading chit checking by bunch checker;				
	Submission of FFB loading chit to office;				



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle 2	Principle 2: Transparency			
Indicator	Summary of Assessment	Compliance		
	Record at FFB sale book (Keep record for 7 years).			
	GTCSB use FFB delivery chits as documents from estate for transporting FFBs to mills. GTCSB received mill weighbridge ticket as a proof of FFB delivery.			
	The records include FFB record from FFB checker, dispatch chit, and weighbridge ticket.			
	Document review, FFB record books, delivery notes and weighbridge tickets were verified.			
	The unique number is the FFB delivery order number.			
	Example of information on Oil Mill weighbridge ticket for Estate includes:			
	i. Date: 06/08/2024;			
	ii. Delivery note no: 00746;			
	iii. Collecting Center: Marudu FFB Trading Sdn Bhd;			
	iv. W/bridge ticket no: 051111;			
	v. Net weight: 870 Kg.			
	Example of Information Estate Delivery Order:			
	i. FFB delivery chit number: 00746;			
	ii. Date: 06/08/2024;			
	iii. Estate: Gemini Trading Cooperation Sdn. Bhd;			
	iv. Lorry No: SYJ 7695;			
	Final weight of FFB is based on Oil Mill's weighbridge ticket.			
4.2.3.2	GTCSB carried out Internal audit on 04/11/2024 that includes traceability system.	Yes		
	There are no findings for traceability found in internal audit result.			
4.2.3.3	GTCSB appointed Estate Manager as person in-charge for traceability dated 15/09/2023.	Yes		
4.2.3.4	GTCSB established monthly FFB yield production report.	Yes		
	Traceability SOP updated 01/09/2024 describe the records are kept for period of 7 years.			
	Reviewed GTCSB FFB delivery chit and mill weighbridge ticket dated 06/08/2024 from estate to mill are well maintained.			
	The unique number of both documents is the FFB delivery order number.			
	Example:			
	FFB delivery chit information;			
	1. DO Number: 00746;			
	2. Date: 06/08/2024;			



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle 2: Transparency				
Indicator	Summary of Assessment	Compliance		
	3. Vehicle no: SYJ 7695.			
	Mill weighbridge ticket information;			
	1. Ticket no: 051111			
	2. DO number: 00746;			
	3. FFB net weight: 870 Kg;			
	4. Date: 06/08/2024.			
	All the stated information can be trace to GTCSB FFB delivery note.			

Principle 3	3: Compliance to legal requirements	
Indicator	Summary of Assessment	Compliance
4.3.1.1	GTCSB established list of permits and license for all estate operation.	Yes
	Example:	
	1. MPOB license 509340902000 valid until 30/11/2025;	
	2. JTK permit valid until 10/01/2025;	
	3. Trading license valid until 31/12/2024.	
4.3.1.2	GTCSB established legal register dated 25/03/2019 and updated on 01/09/2024 with applicable laws, regulations and guidelines.	Yes
	The applicable clauses are listed in the summary of the legal register.	
	The legal list included:	
	1. Environmental Quality Act 1974;	
	2. Human Rights Commission Act 1999.	
	3. Minimum Wages Order Amendment 2022.	
	Occupational Safety & Health amendment 2022.	
4.3.1.3	GTCSB established legal register dated 25/03/2019 and updated on 01/09/2024 with applicable laws, regulations and guidelines.	Yes
	The latest update includes Occupational Safety & Health Amendment 2022.	
4.3.1.4	GTCSB established flowchart for Mechanism of tracking changes in the laws document no 4.3.1-2, updated on 02/09/2022.	Yes
	Document reviewed on flowchart mechanism for implementation of legal requirements doc no. 4.3.1.1 updated on 02/09/2022 describes the estate manager is the PIC to track and monitor on any changes.	
4.3.2.1	GTCSB established list of land titles listing the title Number, size (Ha) issuance authority, years of tenure, date of title and expiry date.	Yes
	Type of land titles are Country Leased and Provisional Leased.	
	Type of activity: Currently coconut or rubber or paddy.	



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle :	3: Compliance to leg	gal requ	uirements		
Indicator	Summary of Assess	sment			Compliance
	Document reviewed the application to change to Oil Palm submitted to District Land Department in Kudat on 02/12/2018 and waiting for approval.				
		an Perta	anian dated	t and document reviewed, the latest 18/04/2024, the land use change	
	Example:				
	Kg Tambuluran Div	<u>/ision</u>			
		「otal ∃a	Land tenure	Validity date	
	CL055107278 1	2.67	99 years	28/04/1950 to 27/03/2048	
	CL055265079 1	0.41	99 years	01/01/1962 to 31/12/2060	
4.3.2.2				states Gemini Trading Corporation the land title approved by Sabah	Yes
	The tenure of the la	and is 99	9 years lease	e.	
	For Example Kg. Ra	ampai D	Division:		
	1. CL No.: 05	1. CL No.: 055159370. HA : 3.76;			
	Land usage	Land usage: Coconut;			
	Issue by: The director of land & Survey on behalf of The government of State Of Sabah;				
	The owner : Gemini Trading Corporations Sdn Bhd;				
	Tenure: 99	years.			
	2. CL No.: 05 <sup>2</sup>	133385.	. Ha: 7.25;		
	Land usage	e: Cocu	ınut;		
	Issue By: governmen			and & Survey on behalf of The	
	Owner: Ge	emini Tra	ading Corpo	rations Sdn Bhd;	
	Tenure: 99	years.			
4.3.2.3	Document review on estate map was available of each land titles. The land titles include a map stating the size in a hectare with boundary markers.				Yes
	Example;				
	Kg. Popot Sikuati D	Division			
	Title no: PL05628	32707;			
	Total area: 9.91 Ha	a.			
	During field visit of wooden stick/used		l boundary	markers are well maintained with	



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle :	Principle 3: Compliance to legal requirements		
Indicator	Summary of Assessment	Compliance	
4.3.2.4	GTCSB land are purchased from previous owner have been approved for transfer by State Land Department.	Yes	
	Therefore, no disputes found during document review.		
4.3.3.1	GTCSB land titles are country and provisional leased issued by the state or district land offices.	Yes	
	There are no customary land title. Therefore, there are no land use rights issues.		
	Example of Kg Popot Sikuati Division:		
	Provisional Lease no PL056282707, validity from 01/01/1963 to 31/12/2067, 99 years tenure, purpose for coconut. Total area are 9.91 ha own by Gemini Trading Corporation Sdn. Bhd. on 20/79/2004.		
4.3.3.2	GTCSB does not has any customary title, therefore, no map available.	Yes	
4.3.3.3	GTCSB land title are approved by State or Sabah offices where a public notification is made by the land office during transfer of title from previous owner. Therefore, no FPIC required.	Yes	

Principle 4: Social Responsibility, health, safety and employment conditions				
Indicator	Summary of Assessment	Compliance		
4.4.1.1	GTCSB established Social Impact Assessment, updated on 31/10/2024.	Yes		
	The assessment include survey and feedback from internal stakeholders such as workers and external stakeholders such as NGOs, government agencies, neighboring estates, suppliers and dealers.			
	According to the management, the assessment will be conducted annually or if there are any changes required.			
	The assessment has taken consideration in finding the positive and negative impacts and plan for mitigation.			
	There is no negative impact identified during the assessment.			
	The positive impact identified are on free water and electricity supply from the company and free transportation.			
4.4.2.1	GTCSB established complaint and grievance procedure, doc. no. PH-4.4.2, updated 08/08/2024.	Yes		
	Evidence of complaint and grievance procedure displayed at estate notice board observed.			
	The flowchart indicates the PIC and timeline to resolve any complaint received.			
	Timeline to resolve complaint is 3 days at estate level and required 10 days more for top management approval of any unsolved complaint at estate level.			
	Field interviews with chemical sprayers and general workers informed they understand the complaint and grievance procedure.			



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle 4: Social Responsibility, health, safety and employment conditions				
Indicator	Summary of Assessment	Compliance		
4.4.2.2	GTCSB established complaint and grievance procedure, doc. no. PH-4.4.2, updated 08/08/2024.	Yes		
	During site visit observed complaint and grievance procedure is displayed at estate notice board.			
	The flowchart indicates the PIC and timeline to resolve any complaints received.			
	Timeline to resolve complaint is 3 days at estate level and required 10 days more for top management approval of any unsolved complaint at estate level.			
	Field interviews with chemical sprayers and general workers informed they understand the complaint and grievance procedure.			
4.4.2.3	GTCSB established procedure indicates that supervisor needs to resolve the complaint received within 3 days while the Estate Manager needs to resolve the complaint within 10 days.	Yes		
	There are no complaints received for year 2024.			
4.4.2.4	GTCSB complaint and grievance book are available at the office and accessible by all workers and stakeholders.	Yes		
	During site visit, observed complaint and grievance forms displayed at office.			
	Field interviews with chemical sprayers and general workers informed they understand the complaint and grievance procedure.			
	There are no complaints received for year 2024.			
4.4.2.5	GTCSB conducted training on estate procedures for all workers on 20/10/2024.	Yes		
	Field interviews with chemical sprayers and general workers informed they understand the complaint and grievance procedure.			
	During site visit observed working procedure is displayed at estate notice boards.			
4.4.3.1	GTCSB employed locals to support estate operations.	Yes		
	Example:			
	- General workers			
	- Drivers			
	- Estate In-Charge			
	Review on employee list dated 01/10/2023 confirmed that 15.63% or 5 out of 32 workers are local people.			
4.4.4.1	GTCSB establish Safety and Health policy updated on 01/09/2021 signed by Company Director.	Yes		
	Policy states:			



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle 4	Principle 4: Social Responsibility, health, safety and employment conditions					
Indicator		nary of Assessment	Compliance			
	1.	Protecting the safety and health of all members of the company and others who may be affected by the work carried out;				
	2.	Preventing and maintain a clean and safe environment work place for all our employees;				
	3.	Providing all necessary safety devices and protective equipment and to supervise their use;				
	4.	Communicating the policy to all employees' interested parties and persons working for all on behalf of the company;				
	5.	Continually improving the performance of the safety and health management system;				
	6.	Ensure all the precautions are follows the safe use of agricultural chemical in plantation;				
	7. Creating a safe system of work includes providing information, instruction, training activities in accordance with the duties of employer as stipulated in the Occupational Safety and Health Act 1994:					
	Responsibility for providing PPE and SOP for workers to prevent infectious disease.					
	During site visit observed policy displayed at the estate notice boards.					
	Briefir					
4.4.4.2	а	a GTCSB establish Safety and Health policy updated on 01/09/2021 signed by Company Director.				
		Briefing on policies to workers conducted on 20/10/2024.				
	Field interviews with sampled chemical sprayers and general workers informed they understand the Safety and Health Policy.					
		During site visit, observed safety policy displayed at estate notice boards.				
		Information on safety policy has been shared with external stakeholders during stakeholder meeting on 30/10/2024.				
	b	GTCSB established risk assessment doc. No. GT-4.4.4-4 dated on 01/10/2022 and updated 01/09/2024.	Yes			
		HIRARC established include all the relevant activities of the estate operations.				
		HIRARC table include activity, hazards, risk and effects, risk assessment (consequence, likelihood, risk rating), existing control, PIC, risk assessment after control (consequence, likelihood, risk rating description) and date review.				
		For example				
		Activity: Harvesting near with cable line;				
		Hazards: Electrocution from touching lines ;				



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle /	Principle 4: Social Responsibility, health, safety and employment conditions			
Indicator		nary of Assessment	Compliance	
		Risk and Effects: Electrocution fatality or injuries;	-	
		Risk Assessment: 12;		
		Risk Level: Moderate;		
		Existing Control: Regular training and briefing to workers;		
		Risk Control Proposal: Constant monitoring;		
		PIC: Estate Manager.		
		Field interviews with sampled harvesters informed they understand the risk of specific task.		
		Reviewed and verified training records on harvesting carried out on 20/10/2024.		
	сi	GTCSB conducted briefing on safe work practices to workers on 20/10/2024 conducted by Estate Manager.	Yes	
		The training included awareness on safety policy, PPE, emergency evacuation procedure, fire extinguisher and operation safety and health procedure.		
		Field interviews with sampled chemical sprayers and general workers informed they are aware of Safety and Health Policy and working procedure.		
	c ii	During site visit, observed SDS displayed at storage facilities.	Yes	
		Example of SDS information:		
		Product: Cyperplex 25EW;		
		Function : Chemical;		
		Date SDS prepared: 02/09/2020.		
		Reviewed and verified latest medical surveillance records for chemical sprayers carried out on 12/10/2024.		
		The medical surveillance report concluded all workers are fit for chemical spraying.		
		During site visit at stores observed safety signage are displayed. Chemicals and fertilizers are labels and properly stacked.		
	d	GTCSB provide appropriate personal protective equipment (PPE) to their workers.	Yes	
		PPE records are reviewed.		
		Example:-		
		PPE Issued: Goggle, hand-glove, mask and safety boots,		
		Date of Issued: 20/10/2024.		
		PPE issuance records are reviewed.		
		CHRA report dated 05/09/2024 describes the type of PPE required.		



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle 4	ple 4: Social Responsibility, health, safety and employment conditions			
Indicator	Sumn	nary of Assessment	Compliance	
	е	GTCSB established procedure 'Penyimpanan Dan Pengurusan Bahan Kimia' doc. No: 4.6.1-10 updated 01/09/2024.	Yes	
		The SOP describes the steps to handle chemicals and storage.		
		During site visit, observed chemical containers arranged and stored in chemical store. All chemical containers are well arranged and stored appropriately in chemical store.		
	f	GTCSB appointed health and safety coordinator to oversee the health and safety aspects of all operations activities.	Yes	
		Document review verified the appointment letter dated 09/10/2024.		
		Document review verified the appointed person has been attended the OSH Coordinator course as required by DOSH dated 07/09/2024 - 09/10/2024.		
	g	GTCSB has less than 40 workers, therefore not required to conduct quarterly safety meeting in accordance to DOSH requirements.	Yes	
		GTCSB workers meeting conducted on 20/10/2024 include the discussion on safety issue such as PPE, safety SOPs, disposal of mask, and reporting of accidents.		
	h	GTCSB establish flowchart for emergency respond plan doc. No. GT-4.4.4-1 dated 01/04/2021.	Yes	
		During site visit, observed emergency procedure and contact number displayed at estate notice board.		
		GTCSB workers meeting conducted on 20/10/2024 include awareness on emergency procedure.		
		Field interviews with sampled chemical sprayers and general workers informed they are aware of the accident reporting procedure.		
		As of todate, there are no accidents reported as at audit date.		
	i	GTCSB conducted first aid and CPR by Malaysian Red Crescent Sandakan District on 09/10/2024 which involve the Estate Mandores and Assistant Manager.	Yes	
		During site visit observed emergency procedure and contact number displayed at estate notice board.		
		During site visit sighted the first aid kits are equipped with approved contents.		
		Site interview with estate representative informed they have been trained on first aid kit.		
		Reviewed latest first aid training carried out on 20/10/2024.		
	j	GTCSB establish record book for accidents and injuries. Accident record book and JKKP forms are reviewed.	Yes	
		There is no injuries as at audit date.		



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle 4	Principle 4: Social Responsibility, health, safety and employment conditions			
Indicator	Summary of Assessment	Compliance		
	Copy JKKP registration form dated 10/02/2019 is verified.			
	JKKP 8 report submission dated 23/01/2024 with no accident case sighted in the report has been shared and reviewed.			
	Field interviews with sampled chemical sprayers and general workers informed there are no accidents for 2024 and had been briefed on accident reporting procedure.			
4.4.5.1	GTCSB established Good Social Practice policy dated 01/04/2021 and updated 01/09/2024 signed by Company Director.	Yes		
	The policy states:			
	<ul> <li>Respect and protect the fundamental of Human Rights as stated in Universal Declaration of Human Rights of the United Nations.</li> </ul>			
	During field visit observed policy is displayed at estate notice boards.			
	Workers are briefed on Good Social Practice policy dated 20/10/2024.			
	Field interviews with sampled chemical sprayers and general workers informed they are aware of Good Social Practice policy.			
4.4.5.2	GTCSB established Good Social Practice policy dated 01/04/2021 and updated 01/09/2024 signed by Company Director.	Yes		
	The policy states:			
	<ul> <li>The company does not engage in or support discriminatory practices and provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</li> </ul>			
	Field interviews with sampled chemical sprayers and general workers informed that there is no discrimination practiced at the estate.			
4.4.5.3	GTCSB established employment contract which stated list of piece rated works. The employment contracts are signed by workers and estate manager.	Yes		
	Based on pay slips review, workers are paid according to the agreed piece rate stated in employment contract.			
	Example:			
	Workers are paid based on working hours RM 7.22/hour.			
	Piece rated work is paid based on piece rate list agreed by both parties.			
	Reviewed wages paid for workers with passport number E 5294365, C 7729234 and PHD 1302530.			
	Wages are paid in accordance to Minimum Wages Order 2022.			
	Field interviews with sampled workers as mentioned above informed that they understand wages calculation and no unauthorized deductions has been made by the management.			
4.4.5.4	GTCSB does not engage contractors for field operations and transport of FFBs. Thus, no pay slip for contractor's workers available.	Yes		



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle 4	Principle 4: Social Responsibility, health, safety and employment conditions			
Indicator	Summary of Assessment	Compliance		
4.4.5.5	GTCSB established list of workers by divisions.	Yes		
	The worker's list states name, gender, nationality, Date of birth, date join work, age, and job task.			
4.4.5.6	GTCSB established employment contracts signed by workers and estate management.	Yes		
	The contracts terms and conditions covers all terms and conditions as stipulated in Sabah Labour Ordinance Cap 67 Act 1950 and Minimum Wages Order 2022 such as annual leave, sick leave, termination period and wages.			
	Field interviews with sampled chemical sprayers and general workers informed that they had been briefed regarding the contract agreement and understand the content of the contract.			
4.4.5.7	GTCSB established check roll records system to monitor workers working hours.	Yes		
	Workers are briefed on the working hours during induction course and daily morning muster.			
	Review of workers' pay slip and field interview with estate management and sampled chemical sprayers and general workers informed no overtime practiced by the company.			
4.4.5.8	During site visit, observed working hours for GTCSB displayed at estate office notice boards.	Yes		
	Working hours:			
	Start Work: 7.00am – 11.00am;			
	Rest Time: 11.00am – 1.00pm;			
	Resume Work: 1.00pm – 5.00pm.			
	The working hours are in line with Sabah Labour Ordinance 1950, spread of 10 hours including 8 hours of work and 2 hours of rest time.			
	Field interviews with sampled chemical sprayers and general workers informed that know the working hours at the estates and there are no additional work time requested by the management.			
4.4.5.9	GTCSB established payslip and distributed to workers.	Yes		
	Review on August 2024 payslips for workers with passport numbers E 5294365, C 7729234 and PHD 1302530 describe workers are paid based on mutually agreed piece rate stated in their employment contract.			
	There are no overtime carried out by workers. Therefore no overtime payments.			
	Field interviews with sampled chemical sprayers and general workers informed they understand the wages provided by company.			
	Sampled above workers informed they are provided with copy of payslips for their reference.			



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle 4	Principle 4: Social Responsibility, health, safety and employment conditions			
Indicator	Summary of Assessment	Compliance		
4.4.5.10	GTCSB provides benefits to both local and foreign workers.	Yes		
	Types of benefits provided are as below:			
	1. Medical expenses;			
	2. Transportation to clinic;			
	3. SOCSO coverage for Foreign and local Workers;			
	4. KWSP for local workers;			
	5. Housing;			
	6. Free water and electricity supply.			
	Field interviews with sampled chemical sprayers, manurers and harvesters confirmed the types of benefits provided by the management.			
4.4.5.11	GTCSB adopts palm oil industry best practices for worker quarters.	Yes		
	The worker quarters are provided with clean water and electricity.			
	During site visit at worker quarters sighted the worker quarters are in good condition.			
	Besides, water storage tanks are also provided for workers to ensure no shortage in water supply.			
4.4.5.12	GTCSB established Good Social Practice policy; dated 01/04/2021 and updated 01/09/2024 signed by Company Director.	Yes		
	The policy states			
	<ul> <li>Ensure that procedures are in place to prevent sexual harassment and any other forms of violence against women, workers and community.</li> </ul>			
	During site visit observed policy displayed at estate notice boards.			
	Briefing on policy conducted on 20/10/2024 for workers.			
	Field interviews with sampled chemical sprayers and general workers informed there are no forms of sexual harassment at workplace.			
4.4.5.13	GTCSB established Good Social Practice policy dated 01/04/2021 and updated 01/09/2024 signed by company director states:	Yes		
	<ul> <li>Respect employees that have rights and freedom to form or join trade union.</li> </ul>			
	No trade union formed or established at GTCSB.			
	Field interviews with sampled chemical sprayers and general workers informed there are no trade unions formed at the estates.			
	However, there are biannual meetings carried out between worker representatives and management.			
4.4.5.14	GTCSB established Good Social Practice policy dated 01/04/2020 and updated 01/09/2024, signed by Company Director.	Yes		
	Policy states:			



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle 4	rinciple 4: Social Responsibility, health, safety and employment conditions				
Indicator	Summary of Assessment	Compliance			
	<ul> <li>Ensure that no child or young person under age 18 shall be or be required or permitted to be, engaged in any employment other that those allowed by the laws.</li> </ul>				
	Employees list has been reviewed. All workers are above 18 years of age.				
	Field interviews sighted there are no children or child labour employed by the estate management.				
4.4.6.1	GTCSB established training plan for year 2024 updated 30/09/2024.	Yes			
	Training provided: SOP for Safe Working, Chemical handling, PPE use, Fire Drill and Emergency Response plan, Company Policy, Social and Human Right				
	Example of training record:				
	Company policies, MSPO, safety and health, environment and social dated 20/10/2024.				
4.4.6.2	GTCSB established training matrix according to the workers job task.	Yes			
	Training matrix are continuously from 2019 until todate based on job task for each workers employed.				
	Training need analysis had been carried out and updated as at 20/10/2024.				
	Records of training, attendance list, photos and materials are documented.				
4.4.6.3	GTCSB established the Annual Training Programme for year 2024 updated 30/09/2024.	Yes			
	Training programme for all workers and management updated on 20/10/2024.				
	Example list of training programme:				
	1. Company Policies;				
	2. SOPs;				
	3. Safety;				
	4. Environment.				
	Trainings related to all workers will be further carried out in year 2024.				

Principle 5: Environment, natural resources, biodiversity and ecosystem services				
Indicator	Summary of Assessment	Compliance		
4.5.1.1	GTCSB established Environmental policy, updated 01/09/2024 signed by Director.	Yes		
	The policy stated "GTCSB is committed to minimizing the environmental impact of its operations and understands the importance of conserving natural resources. Management shall strive to promote environmental improvements whenever practical that will ensure a sustainable future.			



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle !	5: E	nvironment, natural resources, biodiversity and ecosystem services					
Indicator	Sι	ımmary of Assessment	Compliance				
	Sit Ma						
		GTCSB has established Environmental Management Plan (EMP) updated on 01/09/2024.					
		The EMP has include the relevant laws and regulation such as Environmental Quality (Scheduled waste) Regulation 2005.					
		MP has stated Activity, Environment Aspect, Environment Impact, risk sessment, mitigation or improvement plan, monitoring, and PIC.					
		akeholders consultation conducted on 30/10/2024 include briefing of prironmental policy.					
	Po	olicy training conducted to workers, dated 20/10/2024.					
		eld interviews with sampled chemical sprayers, and general workers formed workers aware of Environmental policy and environmental plan.					
4.5.1.2	а	GTCSB has established Environmental policy, updated 01/09/2024 signed by Company Director.	Yes				
		Objective of EMP are:					
		<ol> <li>To ensure a continuous awareness of the need to check and monitor key environment components for GTCSB and take appropriate remedial measures to avoid environmental degradation;</li> </ol>					
		To protect the environment for GTCSB from neglect, mismanagement and irresponsible activities in palm oil estates operations;					
		<ol> <li>To ensure conformation to all activities are within the laws/acts and legislation of state and nation.</li> </ol>					
	b	GTCSB EMP included the environmental aspect and impacts assessment, updated on 01/09/2024.	Yes				
		The assessment identified the aspects and impacts for all estate operation such as spraying, manuring, harvesting, transport of FFB.					
		Below is the example of the EMP aspect and impacts assessment:					
		Activities : Chemical spraying;					
		Environment Aspect : Chemical residue washed into water ways and over spraying of chemical;					
		Risk score: 6;					
		Risk description: Low;					
		Environment Negative impact: Water pollution;					
		Improvement / Monitoring plan: By marking palms near to streams and training for workers;					
		Post control risk score: 2;					



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle	5: Environment, natural resources, biodiversity and ecosystem services	·
Indicator	Summary of Assessment	Compliance
	Risk description: Low;	
	Responsibility: Estate Manager.	
4.5.1.3	GTCSB established EMP with latest updated on 01/09/2024 include the negative and positive impact assessment	Yes
	Mitigation for negative impact and promotion for positive impact had been included.	
	EMP has mitigate the negative impacts and promote to the positive ones example:	
	Activities: Manuring;	
	Positive Impacts: Manuring using bowl rather than plastic to reduce natural depletion;	
	Plan to promote: Regular site inspection and training.	
4.5.1.4	GTCSB had established the CIP latest updated on 15/11/2024 for environmental and include the promotion of positive impact.	Yes
	For example:	
	Activities: To provide continuous training to the workers with related to environmental;	
	Positive Impacts: A better understanding on protection of environmental and workers working in a good environmental condition;	
	Person in charge: Estate Manager;	
	Status: On going.	
	Review on the training records, the environmental training conducted on 20/10/2024.	
4.5.1.5	GTCSB established Environmental training program year 2024.	Yes
	GTCSB conducted Policy and EMP training for the employees dated 20/10/2024. Training records includes training material, list attendant and photos.	
	Field interviews sampled chemical sprayers, and general workers informed they are aware of environmental policy.	
4.5.1.6	GTCSB conducted environmental meeting dated 20/10/2024. The meeting include workers to discuss related issue with environmental. Estate manager as a Chairman of the meeting. Sighted the minute meeting of discussion. No feedback from workers regarding to environmental issue.	Yes
	The frequency of the meeting is to be conducted once a year.	
4.5.2.1	GTCSB established diesel consumption records dated 01/10/2024. The baseline is based on 8 years data from 2016 to 2023.	Yes
	The baseline are set as parameter to ensure present diesel usage are at optimum condition. The total diesel usage for year 2024 as of 12/10/2024 is higher compared 2023 due to same operation with low production of FFB as low crop in immature field.	



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle !	5: Environment, natural resources, biodiversity and ecosystem services	
Indicator	Summary of Assessment	Compliance
4.5.2.2	GTCSB established the diesel budget year 2024 to determine energy efficiency of their operations.	Yes
	The records of diesel consumption for machineries and vehicles are monitor on monthly basis.	
	GTCSB received electricity supply from SESB. The budgeted electricity from SESB is 75 kW per worker per month. A record to monitor usage of electricity is established and updated on 01/06/2024. The electricity usage is below budgeted as no heavy-duty equipment used by workers.	
4.5.2.3	GTCSB does not practice renewable energy for their estate.	Yes
4.5.3.1	GTCSB established Waste Management Plan updated on 01/09/2024.	Yes
	Example of waste identified and its sources:	
	Solid waste: Empty chemical containers.	
	Sources: chemical spraying activities;	
	➤ Liquid waste: Used Oil	
	> Source: Workshop	
	o Gaseous waste: Smoke	
	o Source: Farm tractor	
4.5.3.2	a GTCSB established Waste Management Plan updated on 01/09/2024 include identification and monitoring sources of waste and pollution.	Yes
	Example of waste:	
	Waste: Empty chemical containers;	
	Source: Chemical spraying activities;	
	Disposition method: Reused as water containers for chemical spraying activities;	
	Monitoring Plan: Proper monitoring;	
	Responsibility: Estate Manager.	
	Field interviews with sampled chemical sprayers and manurers informed they are aware chemical containers used.	
	Example of pollution:	
	Pollution: Oil Spillage	
	Action Plan: Spill kit availability at workshop and store area.	
	Site inspection at workshop sighted spill kit is available and well maintained.	
	b GTCSB established Waste Management Plan updated on 01/09/2024 has identified waste generated that could be recycle or reused had been implemented.	Yes
	Below is the example :	



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle !	Principle 5: Environment, natural resources, biodiversity and ecosystem services					services	i
Indicator	Sun	nmary o	f Assessment				Compliance
		No	Source Of Pollution	Method	Remarks		
		1.	EFB, Palm frond	Reused	Used for mulching, soil conditioner, nutrient enhancement		
4.5.3.3			s established SOF 0 updated 01/09/2		nemical handling do	cument	Yes
	The	SOP de	escribe on:				
		• Acti	ion taken before	entering chemical	store;		
		• Saf	ety precaution in	chemical store;			
		• Che	emical store man	agement.			
			rinse of chemical e board.	container has doo	cumented and disp	layed at	
		1. Qua	arter fill the conta	iner with water;			
				cap and shake for			
					e down over the spr depeat these steps		
			oserved empty co I premixing.	ontainers are triple	rinsed and marked	with "X"	
4.5.3.4	GT( no.	CSB has 4.6.1-10	s established SOF 0 updated 01/09/2	P work safety for ch 2024. The SOP de	nemical handling do scribe on:	cument	Yes
	The	SOP ha	as describe on:				
			reuse of empty ste collector bin;	schedule waste ex	cept for planting p	ot or as	
		2. Em	pty chemical con	tainers are to store	ed;		
		3. Trip		enducted for all use	ed empty containers	s before	
			empty container ı	used for storage th	e spraying chemica	al pre-	
			served empty co I premixing.	ntainers are triple ı	insed and marked	with "X"	
4.5.3.5				mestic wastes seg I be to the nearest	gregated for recycl rubbish bin.	ing and	Yes
			established by e nicipal domestic		tic waste are disp	osed at	
4.5.4.1	GT	CSB has	s established Wa	ste Management F	lan, updated 01/09	/2024.	Yes
	Exa	mple of	waste identified	and its sources:			



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle :	5: Env	vironment, natural res	ources, biodiver	sity and ecosystem se	ervices	i
Indicator	Sum	ummary of Assessment				Compliance
	Gas	seous waste				
	Sou	rces: Tractors;				
	Тур	pe of waste: Smoke, Carbon monoxide.				
4.5.4.2		CSB Waste Management Plan updated on 01/09/2024. All pollutions sthe action plan to monitoring continuous improvement plan.			Yes	
	Exa	mple:				
	Gas	eous waste:				
	Sou	rce: Tractors;				
	Neg	ative impact: Greenhoเ	ıse gas emissions	•		
	•	Action plan: Frequent	t servicing of tracto	ors according to schedu	le.	
4.5.5.1	а	GTCSB has establis 01/09/2024.	shed water man	agement plan update	d on	Yes
		The plan states the (rainwater), pond and		rce water from water	tank	
		Operation	Source	Usage		
		Estate	Pond	Weed spraying,		
			Water tank	Washing PPE,		
				Triple rinsing,		
				Vehicle washing,		
				Nursery watering		
		Domestic usage	Pipe water	Drinking,		
				Cooking,		
				Bathing		
	b	Water usage are from	rain harvest, pon	d or from external sourc	e.	Yes
		No waterways within required for outgoing		te. Therefore, no monit	toring	
		Site visit sighted the the nearest field with	•	om worker quarters go ystem.	es to	
		All worker quarters are tank.	e provided with toil	lets and equipped with s	septic	
	С			agement plan update sumption usage for don		Yes
		Estate had reused the activity such as for ch		nestic purpose and oper	ration	
		GTCSB has establis record 2023 for rain h		ecord 'Rain Fall daily	data	



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle	5: Er	nvironment, natural resources, biodiversity and ecosystem services	<b>.</b>
Indicator	Su	mmary of Assessment	Compliance
		No dugs pits established to collect water for use at fields.	
	GTCSB established water usage summary to monitor domestic water usage.		
	d	There are no waterways, wetland, river and stream sighted during field visit. No buffer zone and riparian zone need to be established.	Yes
		Review on worker meeting minutes conducted on 18/10/2023 include environment topics such as protection of watercourses and wetlands, including maintaining and restoring appropriate riparian buffer zones.	
	е	No waterways, wetland, river and stream sighted during field visit. No buffer zone and riparian zone need to be established.	Yes
	f	Site inspection sighted GTCSB do not use bore wells for water supply.	Yes
4.5.5.2	The	ere are no bunds and weirs constructed by GTCSB.	Yes
4.5.5.3	sta	CSB used rain harvesting for water collection. Pruned fronds are cked in hilly area horizontally to prevent soil erosion and encourage soil isture.	Yes
4.5.6.1	а	GTCSB had established the Biodiversity Value Habitats, updated 01/09/2024.	Yes
		The assessment has listed type of animal species found within the estate area.	
		Example:	
		1. Water monitor;	
		2. Jungle mynas;	
		GTCSB has established the Information template 'Together Fighting Illegal Poachers dated 02/09/2022.	
		The plan has consist:	
		Type of protected animals;	
		<ol><li>Penalty or punishment for hunting or killing wild and endangered species;</li></ol>	
		3. Related laws and regulation.	
		Site visit observed the information is displayed on the estate notice board for review and worker informed regarding this during morning muster.	
		Field interviews with sampled chemical sprayers and general workers informed they aware on the wildlife and has monitor and report to management if any animal seen.	
	b	GTCSB has established 'Biodiversity value habitats' updated 01/09/2024.	Yes
		The information has been displayed in notice board for worker to review.	



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle !	Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Indicator	Su	immary of Assessment	Compliance	
		The example of species found as below:		
		1. Water monitor;		
		2. Jungle mynas.		
4.5.6.2	а	GTCSB had established the Biodiversity Value Habitats, updated on 01/09/2024.	Yes	
		The assessment has listed type of animal species found within the estate area.		
		Example:		
		1. Water monitor;		
		2. Jungle Mynas.		
		GTCSB has established the Information template 'Together Fighting Illegal Poachers dated 02/09/2022.		
		The plan has consist:		
		Type of protected animals;		
		Penalty or punishment for hunting or killing wild and endangered species;		
		Related laws and regulation.		
		Site visit observed the information is displayed on the estate notice board for review and workers informed regarding this during morning muster.		
		Field interviews with sampled chemical sprayers and general workers informed they aware on the wildlife and has monitor and report to management if any animal seen.		
	b	GTCSB has established Environment Policy updated 01/09/2024.	Yes	
		The policy stated company committed to minimizing the environmental impact of its operations and understands the importance of conserving natural resources.		
		Point 7 stated educating and enhancing awareness pertaining to protection of environment and biodiversity of all related stakeholders through regular trainings and communication.		
		Site visit observed the information is displayed on the estate notice board for review and worker informed regarding this during morning muster.		
4.5.6.3		TCSB established monitoring records to monitor wildlife in and around e estates.	Yes	
	Мо	onitoring record latest updated on 08/06/2024 is reviewed.		
4.5.7.1		TCSB has established Zero burning policy updated 01/09/2024 signed Director.	Yes	



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle !	Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Indicator	Summary of Assessment	Compliance		
	The policy stated zero burning activities of any kind except where necessary write the prior approval of the relevant authorities. This includes domestic waste, agricultural waste and biomass or by products generated by estate.			
4.5.7.2	GTCSB has establish Policy of zero burning, updated 01/09/2024 signed by Director.	Yes		
	There are no serious palm diseases observed during field visit and as per interview with management. Therefore, no special approval for open burning from the relevant authorities.			
4.5.7.3	During field visit observed, there are no serious palm diseases sighted that require burning.	Yes		
	There are no application documents sighted for controlled burning.			
4.5.7.4	GTCSB manage to obtained referral book to manage their replanting activities in field by referring 'Field Handbook: Oil Palm Series for Immature Volume 2 & Mature by Ian Rankie and Thomas Fairhurst – September 1999'.	Yes		
	There are replanting carried out in year 2023 for 42.84 ha in year 2023.			
	During field visit at replanting area observed that the old palms are felled, chipped, shredded and mulched.			

Principle 6	Principle 6: Best Practices		
Indicator	Summary of Assessment	Compliance	
4.6.1.1	GTCSB established SOP for best practice example:	Yes	
	1. SOP for spraying, doc. no.: 4.6.12 updated on 15/09/2023;		
	2. SOP for manuring doc. no.: 4.6.1-4 updated on 15/09/2023;		
	3. SOP for harvesting, doc. no.: 4.6.1 – 6 updated on 15/09/2023.		
	Briefing conducted on 20/10/2024 for workers that include SOPs. Training material and attendance records reviewed.		
	Example:		
	MSPO policy training;		
	Zero burning procedure;		
	Chemical mixing training;		
	Harvesting procedure training;		
	5. Safe work for drivers.		
4.6.1.2	GTCSB adopts Field handbook oil palm series volume 2, immature dated 1999, doc no: ISBN: 981-04-1433-1.	Yes	
	Page 54 describe terraces of platform are constructed in steeper areas in order to:		



Company Name: Gemini Trading Corporation Sdn. Bhd.

Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle (	6: Best Practices	
Indicator	Summary of Assessment	Compliance
	Facilitate effective establishment, maintenance and harvesting of palms;	
	Minimize soil erosion;	
	Reduce rainwater runoff and nutrient losses;	
	Increase water infiltration;	
	Conserve moisture and increase water infiltration;	
	Provide each palm with equal access to light, nutrients and water.	
	Field visit and interviews with sampled chemical sprayers, general workers and management team indicates there is no riparian zone within the estate.	
	However, workers did aware that no chemical or fertilizer application to be carry out near the waterways.	
4.6.1.3	GTCSB established block marker for each block.	Yes
	Example:	
	• Div: G1;	
	• Block: 01;	
	Total Ha: 6.96;	
	Year planting: Jul 2021;	
	Seedling: IJM.	
4.6.2.1	GTCSB established management financial and budget for 5 years from 2023 until 2027 updated 01/11/2024.	Yes
	The financial management plan includes:	
	FFB production and price forecast;	
	Total expenditure;	
	3. Labor wages;	
	Budget for continuous improvement plan;	
	5. Summary budget for CIP.	
4.6.2.2	GTCSB established management financial and budget, updated 01/11/2024. The budget established allocated for year 2023 until 2027.	Yes
	The financial management plan includes:	
	FFB production and price forecast;	
	2. Total expenditure;	
	3. Labor wages;	
	Budget for continuous improvement plan.	
4.6.2.3	GTCSB established replanting programme for year 2030 until 2032 updated 01/10/2024.	Yes



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle (	Principle 6: Best Practices		
Indicator	Summary of Assessment	Compliance	
	Example:		
	2030: 24.34 ha		
	2031: 32.98 ha		
	2032: 21.66 ha		
4.6.2.4	GTCSB established 5 years financial management plan from 2023 to 2027 includes following:	Yes	
	Planting material;		
	2. Cost per ton;		
	Expected FFB output;		
	4. Yield per ha;		
	5. Price forecast.		
4.6.3.1	GTCSB established the pricing mechanism for the product purchased.	Yes	
	Quotation and purchasing order had been established.		
	The payment term stated the price and quantity of the product includes in the purchase order.		
	Reviewed and verified purchasing of ERP fertilizer dated 14/06/2024 to Biotech Solutions.		
4.6.3.2	GTCSB has documented records of quotation / purchased order as agreed on the term and conditions.	Yes	
	Payments are made in timely manner to supplier as indicated in the transaction receipt dated 13/08/2024.		
	Sighted invoice payment to Biotech Solutions has been paid by management.		
4.6.4.1	GTCSB does not engaged contractors for field operations and transportation.	Yes	
	Therefore, no records of briefing established.		
4.6.4.2	GTCSB does not engage any contractors. Therefore, no contract agreement established.	Yes	
4.6.4.3	GTCSB does not engage any contractors. Therefore, no documents established.	Yes	
4.6.4.4	GTCSB does not engage any contractors. Therefore, no documents established.	Yes	



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Principle 7	7: Development of new planting	
Indicator	Summary of Assessment	Compliance
4.7.1.1	GTCSB established Planting statement dated 01/10/2024.	Yes
	The first planting is carried out on 2004 and last planting carried out on 2014.	
	The latest replanting is conduct on March, April and May 2023 for 42.84 ha.	
	There no new planting carried out within the GTCSB area.	
	Review the Planting statement updated on 01/10/2024, the next replanting will be carried out in year 2030.	
4.7.1.2	There is no new planting conducted, thus no EIA required.	Yes
	According to the planting statement, the latest planting (1st cycle) on 2014.	
	The latest replanting is conduct on March, April and May 2023 for 42.84 ha. It is below 100 ha, thus, no PMM required.	
4.7.2.1	Planting statement, estates maps and land titles are reviewed. There are no peat land in both estates.	Yes
4.7.3.1	Planting statement, estates maps and land titles are reviewed. All division of estates are in the 1 <sup>st</sup> planting starting from 2004 until 2014. Therefore, no SEIA established.	Yes
4.7.3.2	Planting statement, estates maps and land titles are reviewed. All division of estates are in the 1 <sup>st</sup> planting starting from 2004 until 2014. The latest replanting in year 2023. Therefore, no SEIA established.	Yes
4.7.3.3	Planting statement, estates maps and land titles are reviewed. All division of estates are in the 1 <sup>st</sup> planting starting from 2004 until 2014. The latest replanting in year 2023. Therefore, no SEIA established.	Yes
4.7.3.4	Planting statement, estates maps and land titles are reviewed. All division of estates are in the 1 <sup>st</sup> planting starting from 2004 until 2014. The latest replanting in year 2023. Therefore, no SEIA established.	Yes
4.7.4.1	Planting statement, estates maps and land titles are reviewed. All division of estates are in the 1 <sup>st</sup> planting starting from 2004 until 2014. The latest replanting in year 2023. Therefore, no soil map established.	Yes
4.7.4.2	Planting statement, estates maps and land titles are reviewed. All division of estates are in the 1 <sup>st</sup> planting starting from 2004 until 2014. The latest replanting in year 2023. Therefore, no topography map established.	Yes
4.7.5.1	Planting statement, estates maps and land titles are reviewed. There are no new plantings, therefore not applicable.	Yes
4.7.5.2	Planting statement, estates maps and land titles are reviewed. There are no new plantings, therefore no plans establish.	Yes
4.7.5.3	Planting statement, estates maps and land titles are reviewed. There are no new plantings, therefore no documents establish.	Yes
4.7.6.1	Planting statement, estate maps and land titles are reviewed. There are no new planting, therefore no FPIC conducted.	Yes



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Mode of Audit: Onsite

4.7.6.2	Planting statement, estate maps and land titles are reviewed. There are no new plantings, therefore no management plan establish to maintain sacred sites.	Yes
4.7.6.3	Planting statement, estate maps and land titles are reviewed. There are no new plantings, therefore, no documents established.	Yes
4.7.6.4	Planting statement, estate maps and land titles are reviewed. There are no new plantings, therefore, no documents established.	Yes
4.7.6.5	Planting statement, estate maps and land titles are reviewed. There are no new plantings, therefore, no documents established.	Yes
4.7.6.6	Planting statement, estate maps and land titles are reviewed. There are no new plantings, therefore, no compensation documents established.	Yes
4.7.6.7	Planting statement, estate maps and land titles are reviewed. There are no new plantings, therefore, no compensation claims documents established.	Yes
4.7.6.8	Planting statement, estate maps and land titles reviewed and there are no new plantings. Therefore, no impact to local communities.	Yes

#### 4.4. Use of Marks and/or Any Other References to Certification

The audit team leader has reviewed and confirmed that there are no usage of mark/logo in Gemini Trading Corporation Sdn Bhd operation or any on/off-products claim.

# 4.5. Status of Non-Conformities Previously Identified

	The stage 1 audit findings have been reviewed, in particular to assure appropriate corrective actions implemented to address the identified audit findings.
	The last audit results of this system have been reviewed, in particular to assure appropriate corrections and corrective actions have implemented to address any nonconformity identified.
	The last audit results of this system have been reviewed, in particular to assure appropriate corrections and corrective actions have not been implemented effectively. The non-conformity will be re-raised.
Х	No non-conformity raised in previous audit.

Note 1: If a minor non-conformity raised in last audit, is not closed out or repeated, the finding will be raised to a Major non-conformity.

Note 2: All major and minor NCs raise in last audit are required to capture in this report together with the review of the non-compliance implementation.

#### 4.6. Detail of Audit Findings in last audit

AUDIT OUTCOME				
During last Audit	0	MAJOR Non-Conformities		
	0	MINOR Non-Conformities		

#### 4.7. Detail of Onsite Audit Findings Identified during this audit

This section gives an overview of the non-conformities raised during this audit.



Company Name: Gemini Trading Corporation Sdn. Bhd.

Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Mode of Audit: Onsite

ONSITE AUDIT OUTCOME				
During this onsite	0	MAJOR Non-Conformities		
audit,	0	MINOR Non-Conformities		

Nr.	Indicator	Description	Location	Opportunity for Improvement
1.	4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.	Field	GTCSB could improve monitoring of updated or any regulations coming into force.
2.	4.4.4.2 (g)	The occupational safety and health plan shall cover the following: g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly.	Document	GTCSB could improve on OSH meeting agenda as follows:  1. Accident report; 2. Workers medical surveillance.

#### 5. CONCLUSION

Gemini Trading Corporation Sdn Bhd has commissioned TUV NORD (Malaysia) Sdn Bhd to conduct recertification audit consisting of one estate according to MSPO 2530-3:2013 Part 3 General principles for Oil Palm Plantations and Organised Smallholders.

From the review of the standard operating procedures, relevant forms, work flow charts established and implemented; the subsequent background investigation and interviews conducted during this surveillance audit have provided TUV NORD Malaysia with sufficient evidence on the fulfilment of the applied standard Principles & Criteria.

In conclusion the certified unit has been established, implemented and continued to improve in managing the estates are in line with the Principles & Criteria of the applied standards of MS 2530-Part 3:2013 General principles for Oil Palm Plantations and Organised Smallholders.

Any audit is based on sampling within an organization's management system and therefore is not a guarantee of 100 % conformity with requirements.

As a result of this audit, the audit team confirms that

Total certified number of estate: 1

Total certified production area: 265.85 Ha

Certified FFBs January 2024 to October 2024: 2,584.86 Mt

Project FFBs November 2024 to December 2024: 848.14 Mt



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Mode of Audit: Onsite

#### 6. RECOMMENDATION

The audit team conduct a process-based audit focussing on significant aspects/risks and objectives required by the standard(s). The audit methods used are interviews, observations, sampling of activities, review of documentation and records.

The structure of the audit is in accordance with the audit plan included in this summary report as annex.

The audit team concludes that the organisation has established and maintained its management system in line with the requirements of the standard(s) and demonstrated the ability of the system to achieve requirements for products and/or services within the scope and the organisation's policies and objectives.

Therefore the audit team recommends that, based on the results of this audit and the system's demonstrated state of development and maturity that this management system certification be

X	Recommended for Recertification		
	Recommended for Continuity of Recertification		
	Recommended for Suspension of Recertification		

Puchong, 02/12/2024

Ariff Bin Lokman
TUV NORD (Malaysia) Sdn Bhd
Audit Team Leader

Puchong, 19/12/2024

Mohamad Norhisham Bin Mohd Salleh TUV NORD (Malaysia) Sdn Bhd Certifier / Approver



Company Name: Gemini Trading Corporation Sdn. Bhd.
Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Mode of Audit: Onsite

# 7. LIST OF STAKEHOLDERS

#### Table 7-1: List of Interviewed Stakeholders

No.	Organisation
1.	Marudu Trading Sdn Bhd
2.	Syarikat Chen Fung



Company Name: Gemini Trading Corporation Sdn. Bhd.

Certifying Unit: Gemini Trading Corporation Sdn. Bhd.

Client Number: 92-141

Audit Type: Recertification 01

Mode of Audit: Onsite

# Distribution / Confidentiality / Rights of ownership / Limitations / Responsibilities / Audit Objectives

This report is sent by the certification body to the members of the audit team and the audit representative of the organisation. All documents (such as this report) regarding the certification procedure are treated confidentially by the audit team and the certification body. This audit report remains the property of the certification body.

An audit is a procedure based on the principle of random sampling and cannot cover each detail of the management system. Therefore nonconformities of weaknesses may still exist which were not expressly mentioned by the auditors in the final meeting or in the audit report.

The responsibility for continuous effective operation of the management system always rests solely with the audited and certified organisation.

#### Salvo clause:

The audit report will be left to the organisation at the end of the audit - subject to approval by the certification body. The independent release process may cause modifications or additions. In these cases a modified revision will be sent to the audited organisation.

The objective (goal) of the audit is to establish compliance of the management system of the aforementioned organization with the requirements of the aforementioned standard in order to achieve or maintain certification through an independent and accredited certification body. Identification of possibilities to improve the management system can also be a component of the audit and is considered simply to be an enhancement; it does not constitute consultancy or advice with regard to the management system.

Annex / Enclosures				
Annex / corresponding audit documentation	<ul><li></li></ul>			