



GLENEALY PLANTATIONS

# SUSTAINABILITY REPORT 2024

*Reinforcing Our Sustainability Journey:  
**Commitment, Care and Continuous Progress***

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## BASIS OF THIS REPORT

Glenealy Plantations Sdn Bhd (GPSB)  
is pleased to present its Fifth Sustainability  
Report (Report) 2024.

This Report provides a contextual overview of GPSB's sustainability performance and outlines our Environmental, Social and Governance (ESG) impact. It communicates our commitment to balancing business growth with creating sustainable value for our stakeholders by striving to minimise our environmental impact and generating long-lasting benefits for the community.

Since publishing our inaugural Sustainability Report in 2021, we have remained steadfast in our long-term commitment to strengthening sustainability across our operations. Each reporting cycle deepens our understanding of the evolving ESG challenges and opportunities, enabling us to better meet the demands of stakeholders and regulatory requirements. This has allowed us to incrementally enhance our reporting and align our disclosures with global standards and frameworks. Going forward, we will continue to strengthen our sustainability journey through collaborations and partnerships and improve our sustainability reporting by adopting best practices and international standards.

## REPORTING PERIOD AND CYCLE

This Report covers our ESG activities from 1 January to 31 December 2024, while the data presented corresponds to our financial year from 1 July 2023 to 30 June 2024. Where applicable, we have included comparative historical data to the best of our ability. Our Sustainability Report is published annually.

## REPORTING SCOPE AND BOUNDARY

This Report covers all GPSB operations under our management control, as listed under **Our Location** on page 2, unless stated otherwise. While the scope of the production data includes both Malaysia and Indonesia, the scope of ESG-related data and disclosures is limited to operations within Malaysia only.

## GUIDELINES AND STANDARDS

This Report has been prepared with reference to the Global Reporting Initiative (GRI) Universal Standards 2021. Some of the indicators and disclosures are also aligned with the United Nations Sustainable Development Goals (UN SDGs).

## MATERIALITY ASSESSMENT

The content of this Report was prepared based on the material matters identified through our materiality assessment. For more information on our material matters, refer to **Our Material Matters** on pages 15-16.

## FEEDBACK

GPSB welcomes questions or feedback about this Report. You may contact us via:

### Email



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50766 Kuala Lumpur

## ABOUT US

GPSB is a palm oil producer based in Borneo, Malaysia, with a significant presence in Sarawak, a sizable footprint in Sabah and a smaller plantation in Indonesia. The company operates four palm oil complexes with 17 estates and four mills in both Sabah and Sarawak. In Indonesia, GPSB has one complex which consists of six estates and one palm oil mill.

GPSB focuses primarily on upstream activities in the palm oil value chain, including the cultivation of oil palm and the milling of harvested Fresh Fruit Bunches (FFB) as well as the processing of fruits from both its own estates and third-party plantations to produce Crude Palm Oil (CPO) and Palm Kernels (PK).

As of 31 December 2024, GPSB has adopted industry-recognised good agricultural and sustainability practices across approximately 40,000 hectares of planted areas in Malaysia and Indonesia.



Vision

At Glenealy Plantations, we strive to be an efficient palm oil producer recognised for our balanced responsibilities towards our communities, natural resources and economic performance.



Mission

1. Deliver the best-in-class value to our shareholders through excellence in management practices
2. Engage our local communities and stakeholders in a responsible manner to ensure fair economic empowerments for all
3. Recognise the need to manage our natural resources sustainably through industry best practices

### Our Locations

**KUALA LUMPUR**  
GPSB's Headquarters

**SARAWAK**  
*Belaga, Jelalong, Lana*

- Belaga Estates and Belaga Palm Oil Mill
- Jelalong Estates and Jelalong Palm Oil Mill
- Lana Estates and Lana Palm Oil Mill

**23,287**  
hectares

TOTAL  
PLANTED  
AREA

**INDONESIA**  
*Bulungan Regency,  
North Kalimantan*

- Abdi Palm Oil Mill

**1,305**  
hectares

PLASMA  
PLANTATION

**5,006**  
hectares

TOTAL  
PLANTED  
AREA

**SABAH**  
*Kinabatangan District*

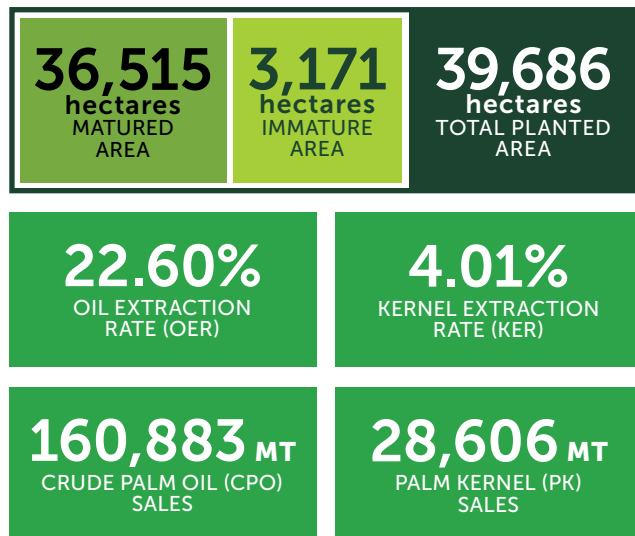
- Timora Estates and Timora Palm Oil Mill

**9,898**  
hectares

TOTAL  
PLANTED  
AREA

## OUR BUSINESS

### Plantations



### Mills

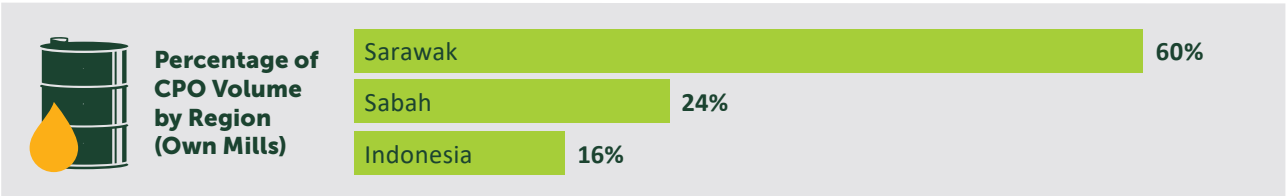
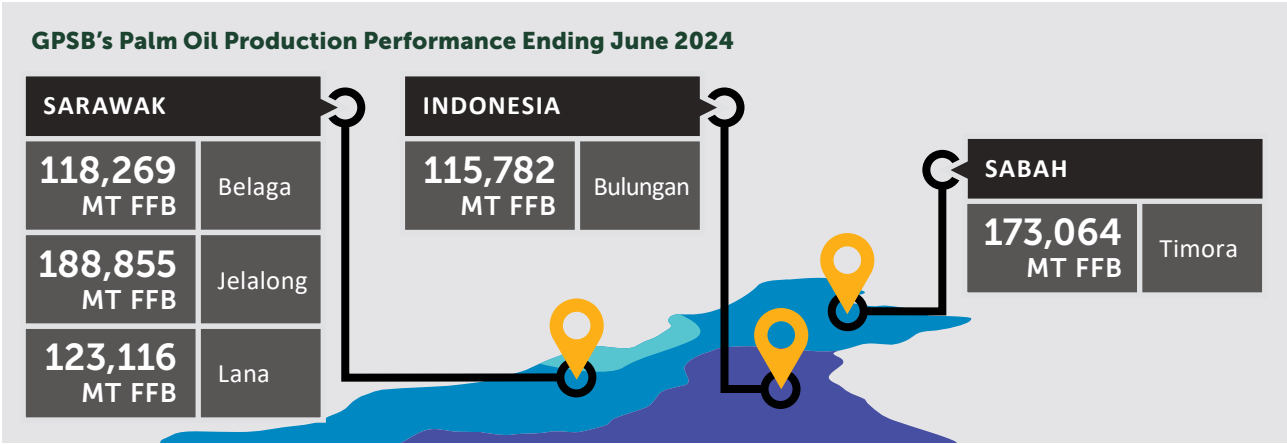


Note: All data presented above are as of June 2024.

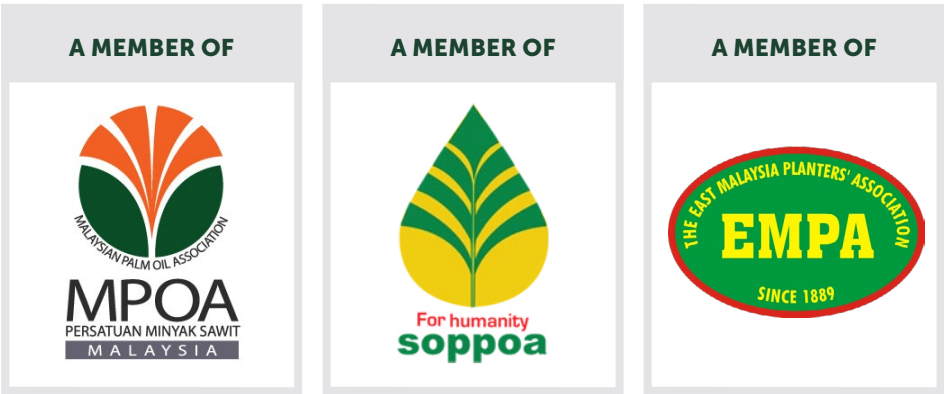
## OUR SUBSIDIARIES

Subsidiary Name	Group's Effective Interest (%)	Country	Principal Activities
Puncak Selasih Sdn Bhd	100.00	Malaysia	Investment holding
Samling Plantation Sdn Bhd	100.00	Malaysia	Operation of oil palm plantations and oil mills
Shariko (M) Sdn Bhd	100.00	Malaysia	Operation of oil palm plantation
Timor Enterprises Sdn Bhd	100.00	Malaysia	Investment holding Operation of oil palm plantations and oil mills
Titleland Development Sdn Bhd	100.00	Malaysia	Operation of oil palm plantation
PT Tunas Borneo Plantations	95.00	Indonesia	Operation of oil palm plantation
PT Abdi Borneo Plantations	95.00	Indonesia	Operation of oil palm plantation
Amalania Koko Berhad	68.54	Malaysia	Operation of oil palm plantation

OUR KEY MILESTONES AND PERFORMANCE



OUR MEMBERSHIPS





## LEADERSHIP STATEMENTS

### MESSAGE FROM OUR PLANTATION DIRECTOR

Dear Stakeholders,

As the world continues to face new challenges and disruptions, it is vital for businesses to change to remain sustainable. Organisations need to adopt new strategies, pivot and adapt to changes to navigate market volatility driven by challenges such as geopolitical tensions, climate change and changing customer demand due to technological disruption.

At GPSB, we will continue to adapt to change by keeping abreast with the evolving needs of our stakeholders and shifts in the global landscape. This includes complying not only with the latest regulatory requirements governing our operations, but also with local and international reporting frameworks and standards to elevate our reporting practices and disclosures.

Our voluntary standalone Sustainability Reports, published annually since 2020, are a testament to our commitment to transparency and accountability. Aligned with the UN Sustainable Development Goals and the Global Reporting Initiative (GRI) Standards, these reports have consistently strengthened our stakeholder engagement.

I am pleased to share that our environmental, social and governance (ESG) scores by the Sustainability Policy Transparency Toolkit (SPOTT), an independent assessment by the Zoological Society of London (ZSL), have increased by more than 16 percentage points from 39.33% in 2020 to 56.18% in 2024. The improvement of our scores is a clear indication of our commitment to enhancing transparency and accountability.

*As a plantation company, sustainability lies at the heart of our operations. Whether through environmental preservation, social value creation or governance enhancement, we are driving sustainability forward by remaining committed to growing responsibly.*

**HAN BOON KWANG**  
Plantations Director



Our actions and decisions are guided by our vision and mission, which are anchored in delivering sustainable outcomes, protecting our environment while creating meaningful social impact for our employees and the communities around us.

I am proud to report that 100% of our mills in Malaysia have successfully maintained their certifications under the Malaysian Sustainable Palm Oil (MSPO) standard. Additionally, 99.96% of our Fresh Fruit Bunches (FFB) are MSPO certified and we have achieved full (100%) FFB traceability to the plantation level.

Due to our stringent policies which are sustainability-led, we have maintained zero confirmed incidents of bribery and corruption, as well as forced and child labour. We will continue to uphold our commitment to ethical and responsible business conduct in the long term. This will include remaining steadfast to No Deforestation, No Peat and No Exploitation (NDPE), minimising our environmental impact by conducting biodiversity assessments and intensifying our efforts in protecting the High Conservation Value (HCV) and High Carbon Stock (HCS) areas.

In addition to ongoing environmental assessments, we continue to conduct Social Impact Assessments (SIA) as part of our due diligence process to identify, manage and mitigate actual and potential impacts on local communities, in line with the MSPO standards. Our operations contribute to local economic value creation by supporting employment, enhancing human capital through future-relevant skills development and fostering leadership among local talent, all of which are key components under the 'Social' pillar of our ESG commitments.

Going forward, we will enhance our engagement with the local community and push forward our sustainability agenda through strategic collaborations with key stakeholders such as institutions of higher learning. The labour rights and welfare of our employees and workers will remain our priority, in addition to biodiversity conservation. We believe that consistency is key to driving meaningful change. We will continue to drive our strategy and initiatives to create value for the business and our stakeholders, contributing to the development of a resilient economy and thriving communities.



## MESSAGE FROM OUR SUSTAINABILITY LEAD

Dear Stakeholders,

The global sustainability landscape is growing in complexity, driven by increasing climate risks, evolving regulations and rising stakeholder expectations. As such, embedding sustainability into our business operations is no longer an option but essential to ensuring long-term value creation and organisational resilience.

Sustainability remains core to our operations. It serves as an enabler for us to navigate challenges more effectively, mitigate environmental and social risks and seize emerging opportunities that support inclusive and responsible growth.

The year 2024 saw us driving forward our actions to further advance our sustainability journey. Guided by our overarching Sustainable Palm Oil Policy, we reinforced our commitment to ethical conduct, environmental stewardship and the well-being of our employees and surrounding communities. The milestones we achieved this year reflect not only our operational progress, but also our aspiration to be a responsible and future-ready business.

### PROTECTING OUR ENVIRONMENT

We strive to minimise our environmental impact across our operations and activities where possible. Our actions to protect and preserve the natural environment and our ecosystems are not limited to minimising waste through 3R (Reduce, Reuse, Recycle), planting trees, harvesting rainwater and using renewable energy. We also build a strong network with key stakeholders such as local institutions to take tangible measures for long-term results. This includes partnering the Borneo Rhino Alliance (BORA) to implement the bearded pigs recovery programme.

Furthermore, we monitor wildlife species to determine baseline data by installing cameras and conducting biodiversity studies, which serves as a fundamental step towards conservation. In 2024, we conducted a study on dragonfly and damselfly, avian, flora and fish/aquatic lives. To advocate biodiversity preservation and raise awareness, we have developed an educational trail, which also preserves the natural ecosystems.

Our Belaga Recovery Project has achieved various milestones since its commencement in 2020. I am pleased to share that we have released the Biological Resources Assessment Report in October 2024, our second after the Preliminary Biological Assessment Report in 2022, demonstrating our continued commitment to the recovery project. Additionally, we have been engaging actively with the project's stakeholders and conducting social engagement. As part of the recovery project, we have begun planting fig trees as a sustainable source of food for wildlife and nutrition for the soil.

### RESPECTING THE RIGHTS OF OUR EMPLOYEES AND WORKERS

We are committed to protecting the human and labour rights of workers, employees and the local communities. Our zero-tolerance approach against the use of child and forced labour have ensured that we do not employ anyone below 18 years old. Internal and external audits are conducted across our operations to monitor labour conditions and identify risks of forced labour, as per the MSPO Standard MS2530:2022.

We work closely with regulators to keep abreast with the changing regulatory landscape, ensuring our practices consistently meet legal requirements. This includes providing fair wages, ensuring that we comply with the national minimum wage where we operate and supplying housing with electricity, sanitation and clean water. We also protect their welfare by offering comprehensive benefits, including free healthcare at estate clinics and annual leave. Going forward, we aim to build more houses for workers to continue to enhance their living condition, safeguarding their rights and benefits.

Beyond providing the necessities, we prioritise our employees' safety and health. Our Health and Safety Policy is upheld across our operations to enforce safe work systems and complies with the Occupational Safety and Health (Amendment) Act 2022. In addition, we audit our health and safety management system regularly and provide training to employees, ensuring that they are always aware and alert about workplace health and safety. Thanks to our continued efforts, fatalities dropped from one incident in 2023 to zero in 2024 and we remain committed to sustaining this achievement.

## UPHOLDING STRONG GOVERNANCE

Strong governance is fundamental to the long-term growth of our organisation. We actively review and enhance our governance policies and practices to ensure that we remain relevant, as we strive to grow responsibly and ethically. In 2024, all our employees received policy training that included the Anti-Bribery and Anti-Corruption Policy and Gift and Entertainment Policy. I am also pleased to share that all our selected major suppliers met the requirements of our performance assessment in 2024. Furthermore, we keep our Senior Management, employees and suppliers informed of our anti-bribery and corruption policies and procedures, reflecting our commitment to truly mitigating bribery and corruption throughout our value chain.

## MOVING FORWARD

*Looking ahead, we will continue to strengthen the integration of sustainability across our operations, guided by transparency, accountability and continuous improvement. We will deepen our efforts in environmental conservation, employee welfare and responsible supply chain practices to ensure our growth does not come at the expense of people or the planet.*

**CHIENG KAI SOON**  
GPSB Sustainability Lead



We are committed to enhancing our data collection and reporting processes, aligning ourselves with emerging regulatory expectations and international frameworks. As we build on the momentum of 2024, we will continue to foster partnerships, empower our workforce and uphold the highest standards of governance, driving forward our sustainability journey for the benefit of current and future generations.

## SUSTAINABILITY AT GPSB

### SUSTAINABILITY HIGHLIGHTS

#### ENVIRONMENTAL

**100%**  
FFB traceability  
to plantation level

**99.96%**  
FFB Malaysian  
Sustainable Palm  
Oil (MSPO) Certified

**100%**  
Malaysian mills  
remained  
MSPO certified  
since January 2020

#### SOCIAL

**ZERO** cases of forced  
and child labour

**ZERO** work-related  
fatalities

**41,739**  
total training  
hours

Average  
**8.6** training  
hours  
per employee  
per year

Benefitted  
**4,830**  
workers

#### GOVERNANCE

**ZERO** confirmed  
incidents  
of bribery and corruption

Improved SPOTT  
score

**56.18%**  
(FY2024)  
39.33%  
(FY2020)

### OUR SUSTAINABILITY APPROACH

GPSB recognises the growing responsibility to balance the interests of our stakeholders with ensuring long-term business growth from the economic, environmental and social perspectives. While we aim to maximise returns for our investors, we are also mindful that economic performance must be guided by a strong awareness of its environmental and social impact.

Our sustainability journey is ongoing and filled with challenges, but we are prepared to meet them. We will continue to enhance our sustainability efforts by working closely with our partners to safeguard our shared future and protect our planet for our future generations.

### OUR SUSTAINABILITY MISSION



Care for the People  
and Communities



Protect the  
Natural Resources



Aim for Prosperity  
and Continuous  
Improvement



Corporate Social  
Responsibility

## ETHOS


In order to successfully execute our Mission in Sustainability and to work towards making our Vision in Sustainability a reality, our Ethos revolves around the following values and principles, building the firmest of foundations:

 <p><b>Integrity</b></p> <p>Because like the human spirit, nothing is of value if it is not born of and guided by integrity; integrity will be our constant guide.</p>	 <p><b>Eye on Sustainability</b></p> <p>Managing natural resources with sustainability firmly in mind, spirit and approach: from beginning to end.</p>	 <p><b>Excellence in Performance</b></p> <p>To strive for excellence in everything we do, so as to be able to deliver best value to our stakeholders.</p>	 <p><b>Collaboration &amp; Cooperation</b></p> <p>We commit to engagement with our local communities and stakeholders, realising that the journey of sustainability is a collective and collaborative effort.</p>
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## OUR SUSTAINABILITY FRAMEWORK AND PLAN

GPSB's Sustainability Framework and Plan guide us in addressing critical issues and responding to our customers' key concerns. This framework provides a structured and consistent approach to advancing our sustainability commitments.

As we look to the future, we remain focused on building smarter, more resilient operations guided by GPSB's Sustainability Framework and Plan. By exploring emerging solutions in energy storage, alternative supply sources and circular innovation, we aim to drive meaningful progress across our value chain while responding proactively to evolving environmental and stakeholder expectations.

TOPIC	SUSTAINABILITY FOCUS	LONG-TERM PLANS AND ACTIVITIES
 <b>PLANET (ENVIRONMENT)</b>		
NDPE	a. Comply with No Deforestation, No Peat, No Exploitation (NDPE) policy b. Conduct High Conservation Value (HCV), High Carbon Stock (HCS) assessment and implement FPIC prior to new development (if any)	1. Conduct due diligence for any new developments or property acquisitions to ensure compliance with NDPE Policy
	Belaga Recovery Project	1. Identify stakeholder groups and ensure ongoing stakeholder engagement 2. Conduct biodiversity assessment and inventory 3. Conduct social study assessment for nearby communities 4. Demarcate Belaga Recovery Project Boundary 5. Patrol/monitor project area to identify potential encroachment 6. Restore degraded area through tree planting 7. Plant fig trees and fruit trees for habitat enrichment
High Conservation Value (HCV)	Comply with MSPO HCV requirement	1. Conduct HCV assessment to identify, manage and monitor HCV zones in accordance with the MSPO HCV guidelines

TOPIC	SUSTAINABILITY FOCUS	LONG-TERM PLANS AND ACTIVITIES
<b>Biodiversity Assessment and Conservation</b>	Identify and designate conservation areas for each operation centre based on ecological significance and biodiversity value	<b>Identified Conservation Areas:</b> <ol style="list-style-type: none"> <li>1. Belaga (B2 Conservation Area)</li> <li>2. Jelalong East (J1 Conservation Area)</li> <li>3. Jelalong West (J5 Adjacent Conservation Area)</li> <li>4. Lana (L3 Conservation Area)</li> <li>5. Sabah (Timora Conservation Area &amp; Amalania Koko Berhad [AKB] Boundary)</li> </ol>
	Conduct a baseline biodiversity assessment, including an inventory study of flora and fauna, and publish the findings for transparency and knowledge sharing	<b>University Partnership for Biodiversity Assessment:</b> <ol style="list-style-type: none"> <li>1. Flora study</li> <li>2. Fauna study: <ul style="list-style-type: none"> <li>• Camera trapping (mammals)</li> <li>• Dragonfly and damselfly study</li> <li>• Avian study</li> <li>• Aquatic and hydrology study</li> </ul> </li> <li>3. Publication (including company website) through Universiti Putra Malaysia, Universiti Malaysia Sarawak and other institutions</li> </ol>
	Implement conservation initiatives, such as wildlife habitat restoration, tree planting for ecosystem enrichment and protection measures to safeguard biodiversity	<b>Restoration and Conservation Initiatives:</b> <ol style="list-style-type: none"> <li>1. Plant fig trees</li> <li>2. Plant fruit trees</li> <li>3. Install signage of wildlife protection</li> <li>4. Patrol and monitor site regularly</li> <li>5. Install artificial bird boxes</li> <li>6. Cultivate beneficial plants</li> </ol>
	Promote environmental education and community engagement through awareness programmes, educational tours, workshops and partnerships with local stakeholders and non-governmental organisations (NGOs) to enhance conservation efforts	<b>Environmental Education and Awareness:</b> <ol style="list-style-type: none"> <li>1. Establish educational trails and flora demarcation</li> <li>2. Engage internship students and other stakeholders for educational or research purpose</li> <li>3. Collaborate with stakeholders and local communities, such as: <ul style="list-style-type: none"> <li>• Borneo Rhino Alliance (BORA) fig and pig project at Timora HCV area</li> <li>• BORA fig tree and orangutan project at AKB</li> </ul> </li> </ol>
	Establish an evaluation and monitoring system to track conservation progress, assess biodiversity trends and continuously improve management strategies	<b>Evaluation and Monitoring:</b> <ol style="list-style-type: none"> <li>1. Assess biodiversity trends</li> <li>2. Continuously improve on conservation initiatives</li> </ol>
<b>Waste Management and Circular Economy</b>	Legal compliance for scheduled waste management	<ol style="list-style-type: none"> <li>1. Consistently manage scheduled waste as per legal requirement</li> </ol>
	Chemical container management	<ol style="list-style-type: none"> <li>1. Reuse for storing spray water</li> <li>2. Recycle through recycling centre</li> </ol>
	Recyclable waste management	<b>Plastic, Paper and Aluminium Cans:</b> <ol style="list-style-type: none"> <li>1. Recycled through recycling centre</li> </ol> <b>Used Tyres:</b> <ol style="list-style-type: none"> <li>1. Disposed through approved contractors</li> <li>2. Repurposed for landscaping, erosion control and soil retention project</li> </ol>
	Invest in sustainable palm-based products and circular economy innovations for mill by-product/waste	<b>Mill By-product Management:</b> <ol style="list-style-type: none"> <li>1. Empty fruit bunch (EFB) – <i>mulching, boiler fuel (waste to energy), incineration</i></li> <li>2. Fibre – <i>Boiler fuel (waste to energy)</i></li> <li>3. Palm kernel shell – <i>Boiler fuel (waste to energy) and excess for selling</i></li> <li>4. Boiler ash – <i>Sell and dispose</i></li> <li>5. Sludge oil – <i>Sell</i></li> <li>6. Decanter cake – <i>Dispose, field organic fertiliser</i></li> <li>7. Final discharge – <i>Recycle for wet scrubber (JPOM, BPOM, TPOM)</i></li> </ol>

TOPIC	SUSTAINABILITY FOCUS	LONG-TERM PLANS AND ACTIVITIES
GHG Reduction and Renewable Energy	Fossil fuel consumption reduction	—
	Invest in solar energy	1. Install solar system to power workers' housing facility 2. Install solar street lighting
	GHG emission monitoring	1. Calculate and monitor the GHG emission value using MSPO's GHG calculator
Soil Management, Buffer Zone Protection and Water Management	Promote cover crops to prevent erosion and soil fertility	1. Plant and maintain cover crop at slope areas and riparian buffer zones
	Implement water conservation techniques	1. All housing units are equipped rainwater harvesting facilities 2. Recycle final discharged water for wet scrubber in the mills (BPOM, JPOM, TPOM)



## PEOPLE (SOCIAL)

Workers' Human Rights and Welfare	Ensure fair wages, housing and healthcare for workers and their family	<ol style="list-style-type: none"> <li>1. Fully comply with Sarawak and Sabah Labour Ordinance (all managers to attend related training and undergo quarterly internal audit by legalisation department)</li> <li>2. Comply with zero recruitment fees rule</li> <li>3. Achieve 100% conversion of wooden housing facilities by FY2032/2033</li> <li>4. Achieve 100% conversion of wooden creche facility in all estates by FY2027/2028</li> <li>5. Ensure housing facility in all estates and mills are supplied with 100% treated clean water and electricity</li> <li>6. Conduct half-yearly employer-employee dialogue</li> <li>7. Organise annual bonding events such as sport or team-building activities</li> <li>8. Continue to reduce negative impacts identified in Social Impact Assessment (SIA)</li> <li>9. Maintain all centres with health facilities (clinics) and competent medical personnel</li> <li>10. Establish sustainable food security programmes such as fruit orchard, vegetable farm and poultry farm, among others</li> </ol>
Gender and Inclusivity	Ensure child-labour free operations	1. Ensure all centres are equipped with well-established Community Learning Centres (CLC) by FY2025/2026
	Promote equal opportunities for women in plantation management and decision-making roles	<ol style="list-style-type: none"> <li>1. Establish a gender committee</li> <li>2. Provide mentorship programmes and cooperative business opportunities for women workers</li> </ol>
Occupational Health and Safety	Promote a safe and healthy work environment and ensure compliance with the Occupational Safety and Health Act (OSHA)	<p><b>Targets:</b></p> <ol style="list-style-type: none"> <li>1. Achieve zero occupational fatality</li> <li>2. Reduce the lost time injury (LTI) rate per 1,000 workers compared to previous years</li> <li>3. Achieve zero citations under OSHA</li> </ol> <p><b>Activities:</b></p> <ol style="list-style-type: none"> <li>1. Conduct hazard identification, risk assessment and risk control (HIRARC) review</li> <li>2. Ensure safe work procedures (SWP) and other safety training programmes</li> <li>3. Organise health, safety and environment (HSE) campaigns</li> <li>4. Conduct occupational safety and health (OSH) audits and inspections</li> <li>5. Maintain competent OSH coordinators, with at least one coordinator in every estate and mill</li> </ol>



TOPIC	SUSTAINABILITY FOCUS	LONG-TERM PLANS AND ACTIVITIES
<b>Community Engagement and Indigenous Rights</b>	Engage with local communities for environmental and social protection and awareness programmes	<ol style="list-style-type: none"> <li>1. Collaborate with stakeholders and communities to focus on environmental protection and social awareness</li> <li>2. Hold annual stakeholder engagement meetings</li> </ol>
	Support nearby communities, education and healthcare institutions through corporate social responsibility (CSR) programmes or economic empowerment programmes	<ol style="list-style-type: none"> <li>1. Allocate an annual budget for CSR programmes</li> <li>2. Conduct planned and ad-hoc CSR programmes</li> <li>3. Allocate an annual budget for internship students</li> </ol>
<b>Smallholder Inclusion</b>	Smallholder engagement	<ol style="list-style-type: none"> <li>1. Encourage smallholder inclusivity by supporting independent farmers with training via annual engagement</li> </ol>
<b>Supplier Inclusion</b>	Supplier engagement	<ol style="list-style-type: none"> <li>1. Communicate company policies with suppliers</li> <li>2. Engage with suppliers periodically</li> <li>3. Achieve 100% traceability to plantations (TTP) in supply chains</li> </ol>
<b>Contractor Management</b>	Enhance contractor compliance towards sustainable practices	<ol style="list-style-type: none"> <li>1. Incorporate MSPO and HSE compliance requirements into contractor agreements</li> <li>2. Conduct contractor MSPO awareness engagement programmes</li> <li>3. Provide HSE training for contractor workers</li> <li>4. Audit contractors periodically</li> </ol>



## PROSPERITY (GOVERNANCE)

<b>MSPO and Other Certifications</b>	Maintain MSPO certification	<ol style="list-style-type: none"> <li>1. Development of competent MSPO internal auditor (minimum one auditor per centre)</li> <li>2. Maintain MSPO certification</li> </ol>
	Explore other sustainability-related certification	<ol style="list-style-type: none"> <li>1. Explore other sustainability-related certifications to boost commercial value and reputation</li> </ol>
<b>Transparency</b>	SPOTT participation	<ol style="list-style-type: none"> <li>1. Maintain or improve yearly SPOTT score</li> </ol>
	GPSB corporate website	<ol style="list-style-type: none"> <li>1. Update corporate website consistently</li> </ol>
	Sustainability report	<ol style="list-style-type: none"> <li>1. Publish sustainability report annually</li> </ol>
<b>Ethical and Compliance</b>	Ensure awareness and implement Anti-Bribery and Anti-Corruption Policy	<ol style="list-style-type: none"> <li>1. Conduct training on Anti-Bribery and Anti-Corruption Policy</li> <li>2. Standardise purchasing and tender procedure</li> </ol>
	Uphold integrity in corporate dealings and ensure compliance with local and international laws	<ol style="list-style-type: none"> <li>1. Establish legal register and ensure compliance with laws</li> </ol>
<b>Policies and Standard Operating Procedures (SOPs)</b>	Review and update company policies and SOPs	<ol style="list-style-type: none"> <li>1. Review company policies periodically</li> <li>2. Review and enhance SOPs or work instructions, such as the Plantation and Milling Manual</li> </ol>
<b>Human Development</b>	Implement structural training model for workers, supervisors and managers to enhance their technical and leadership skills	<ol style="list-style-type: none"> <li>1. Maintain 100% competent personnel in compliance with legal requirement for plantation and milling operations</li> <li>2. Develop a structured mentorship programme and on-the-job learning to build a competent workforce</li> </ol>
<b>Awards and Recognitions</b>	Explore award opportunities and participate in sustainability-related awards	<ol style="list-style-type: none"> <li>1. Participate in the Premier of Sarawak Environmental Award (PSEA)</li> <li>2. Participate in sustainability-related awards</li> </ol>
<b>Complaint and Grievance Mechanism</b>	Establish a robust complaint and grievance mechanism	<ol style="list-style-type: none"> <li>1. Maintain proper documentation for all complaints and grievance record</li> </ol>

## OUR CONTRIBUTIONS TO THE UN SUSTAINABLE DEVELOPMENT GOALS (UN SDGs)

The UN SDGs play a vital role in shaping our operational decisions and sustainability efforts to ensure we minimise our negative impact and generate long-term value for our business and stakeholders.

We have selected the SDGs that are most relevant to our business activities to contribute meaningfully to sustainable development. In addition, we have aligned our sustainability material matters with the following SDGs:









Refer to **Our Material Matters** on page 15 for the relevant UN SDGs linked to our material topics.

## ENGAGING WITH OUR STAKEHOLDERS

At GPSB, stakeholder engagement is a key enabler in identifying and responding to the evolving needs and expectations of our stakeholders. Listening to our stakeholders enables us to gain insights, validate and refine our sustainability activities, ensuring they achieve the intended results and deliver meaningful impact.

We engage with our stakeholders regularly through various platforms and channels, as elaborated in the following table:

STAKEHOLDER GROUP	MODE OF ENGAGEMENT	FOCUS AREA	VALUE CREATION
 <b>LOCAL COMMUNITIES</b>	<ul style="list-style-type: none"> <li>• Informal sessions</li> <li>• Community events</li> <li>• Community meetings</li> </ul>	<ul style="list-style-type: none"> <li>• Community relations</li> <li>• Fair dispute management</li> <li>• Livelihood improvement through CSR programmes</li> </ul>	Engage local communities consistently through both formal and informal channels
 <b>CUSTOMERS</b>	<ul style="list-style-type: none"> <li>• Email and hotline enquiries</li> <li>• On-site visits</li> <li>• Face-to-face meetings</li> <li>• Telephone follow-ups</li> <li>• Annual review and feedback sessions</li> </ul>	<ul style="list-style-type: none"> <li>• Traceability of suppliers' products</li> <li>• Visibility of sustainability initiatives</li> <li>• Leadership commitment</li> <li>• Sustainability policies</li> </ul>	Establish long-term relationships with customers and invest in delivering high-quality products and services aligned with ethical marketing principles
 <b>EMPLOYEES</b>	<ul style="list-style-type: none"> <li>• Employee appraisals</li> <li>• Informal one-to-one sessions</li> <li>• Training</li> </ul>	<ul style="list-style-type: none"> <li>• Occupational health and safety</li> <li>• Grievance procedures</li> </ul>	Engage employees consistently through both formal and informal channels
 <b>NGOS</b>	<ul style="list-style-type: none"> <li>• Explore potential partnership with potential NGOs</li> </ul>	<ul style="list-style-type: none"> <li>• Responsible social and environmental management</li> <li>• Transparency</li> </ul>	Adopt and implement sustainability initiatives



















STAKEHOLDER GROUP	MODE OF ENGAGEMENT	FOCUS AREA	VALUE CREATION
 <b>BANKS</b>	<ul style="list-style-type: none"> <li>• Face-to-face meetings</li> <li>• Regular inspections/visits by financial institutions</li> <li>• Monthly/yearly reporting</li> </ul>	<ul style="list-style-type: none"> <li>• Sustainability commitments</li> <li>• Structured sustainability governance</li> <li>• Improved transparency</li> <li>• Good practices in human rights</li> <li>• CSR efforts for environment and community</li> </ul>	Build trusting and long-term relationships with financial institutions through transparent reporting
 <b>GOVERNMENT &amp; REGULATORS</b>	<ul style="list-style-type: none"> <li>• Face-to-face meetings</li> <li>• Regular inspections/visits by financial institutions</li> <li>• Monthly/yearly reporting</li> <li>• Regular audits</li> </ul>	<ul style="list-style-type: none"> <li>• Regulatory compliance</li> <li>• Sustainability governance</li> </ul>	Achieve full compliance with applicable regulatory requirements and progressively improving sustainability practices through regular inspections, audits and consistent reporting




## OUR MATERIAL MATTERS

Materiality assessments enable us to identify the most significant sustainability issues that impact both our business and stakeholders. They ensure that our resources and efforts are focused on addressing the risks and opportunities of our sustainability issues.

Our last materiality assessment was conducted in 2020 through ongoing engagement sessions with all our stakeholders. As of 2024, the existing seven material topics remain unchanged, with all continuing to be relevant and reflective of our current sustainability context.

We have also mapped these seven material topics to the relevant UN SDGs and GRI Standards that are applicable to our disclosures, as shown in the table below:

MATERIAL TOPIC	UN SDGS	GRI STANDARDS
<b>ENVIRONMENTAL COMPLIANCE</b>	     	302: Energy 303: Water and Effluents 306: Waste
<b>EMPLOYEE OCCUPATIONAL SAFETY &amp; WELL-BEING</b>	 	403: Occupational Health and Safety
<b>PROTECTION OF HUMAN RIGHTS</b>	   	2-7: Employees 2-8: Workers who are not employees 2-25: Processes to remediate negative impacts 401: Employment 402: Labour/Management Relations 404: Training and Education 405: Diversity and Equal Opportunity 406: Non-Discrimination 407: Freedom of Association and Collective Bargaining 408: Child Labour 409: Forced or Compulsory Labour 411: Rights of Indigenous Peoples
<b>PROTECTION OF LOCAL COMMUNITIES</b>	     	203: Indirect Economic Impacts 413: Local Communities

MATERIAL TOPIC	UN SDGS	GRI STANDARDS
LEADERSHIP TRANSPARENCY & ACCOUNTABILITY		2-9: Governance structure and composition 2-12: Role of the highest governance body in overseeing the management of impacts 2-13: Delegation of responsibility for managing impacts 2-14: Role of the highest governance body in sustainability reporting 2-23: Policy commitments
ACCOUNTABILITY, OPENNESS, TRANSPARENCY AND TRACEABILITY		204: Procurement Practices
COMMITMENT TO ANTI-CORRUPTION & ANTI-BRIBERY PRACTICES		205: Anti-Corruption

# OUR SUSTAINABILITY IMPACT

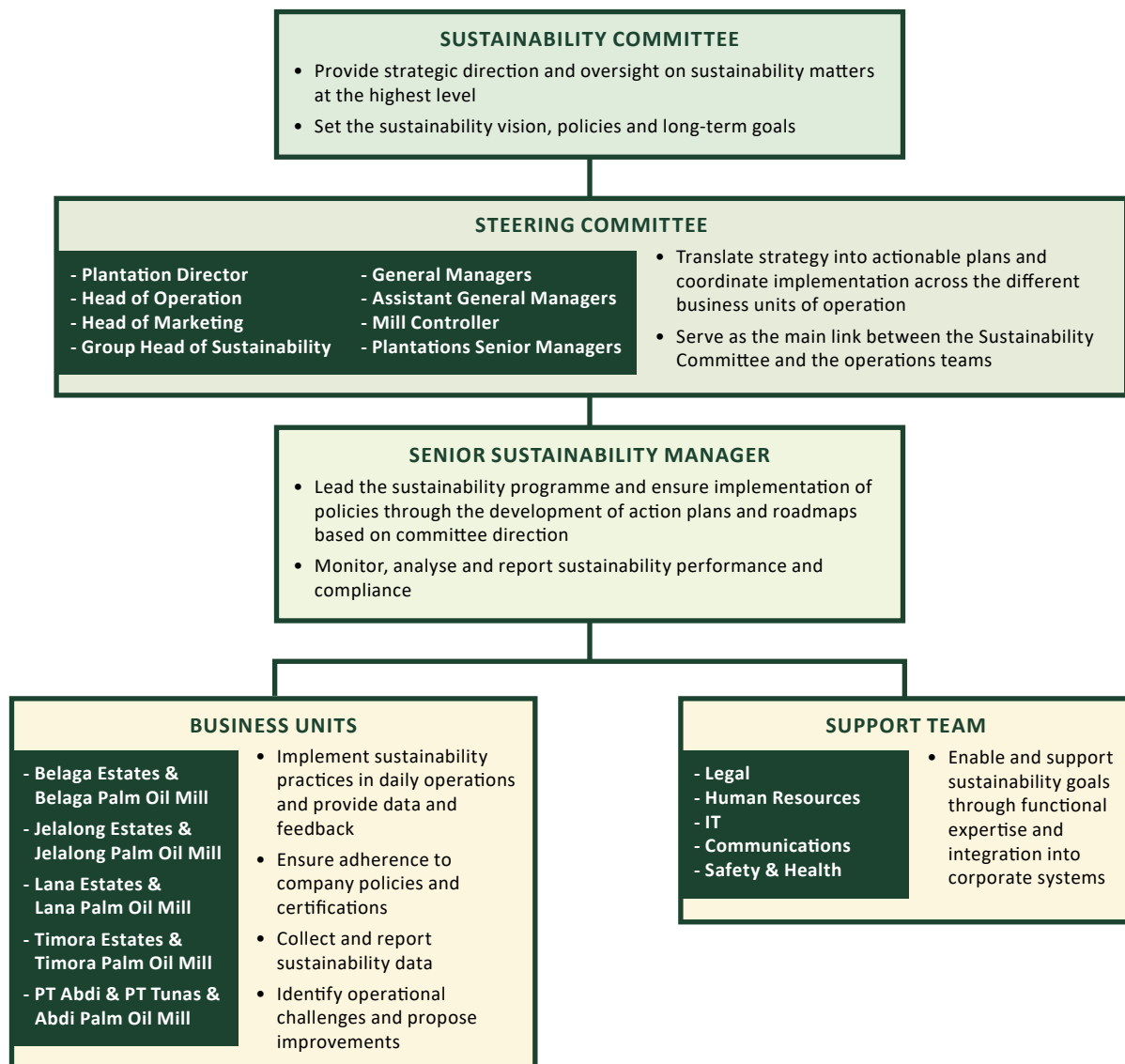
## LEADERSHIP TRANSPARENCY & ACCOUNTABILITY

As expectations for corporate integrity and responsible leadership continue to grow, strong leadership, transparency and accountability are fundamental to maintaining stakeholder trust and ensuring long-term organisational success. These elements promote effective governance, guide ethical decision-making and inculcate a culture of responsibility across all levels of the organisation.

## SUSTAINABILITY GOVERNANCE

At GPSB, sustainability is spearheaded by the Sustainability Committee (SC). Established in 2023, the SC was set up to ensure that the tone from the top and GPSB's sustainability strategy are cascaded to the working level. The SC oversees all sustainability-related matters, ensuring that sustainability is embedded into our daily operations and decision-making processes.

Led by the Plantations Director, the SC consists of members of the Senior Management and Heads of Operations. The SC receives a monthly report from the Steering Committee, which highlights the company's sustainability progress and ESG-related issues. Since the formation of the SC, we have steadily integrated sustainable practices into our daily operations, making sustainability an increasingly central part of our organisational culture.



## SUSTAINABILITY POLICIES

We at GPSB are guided by a set of policies that help us minimise risks and ensure compliance with relevant regulatory requirements. These policies provide a framework that governs our organisational actions and decisions. Our policies are reviewed and updated regularly to uphold best practices and ensure alignment with the evolving regulatory requirements and standards.



### SUSTAINABLE PALM OIL POLICY

This policy ensures that our entire production process, from planting to delivery, is conducted responsibly to protect the environment and, most importantly, the communities living on the land. We aim to ensure that livelihoods grow sustainably and careers develop in tandem with our commitment to preserving natural resources.

- References the United Nations Universal Declaration on Human Rights
- Reaffirms our commitment to respecting the legal and customary land tenure rights of local and indigenous communities by:
  - Prioritising open and continuous consultation with local and indigenous communities in new development areas
  - Obtaining free, prior and informed consent (FPIC) of landowners and users with legal rights when proceeding with new developments. Our FPIC procedures are accessible via our corporate website as reported below
  - Resolving grievances and conflicts with the local community through a functional, unbiased grievance mechanism



### NO DEFORESTATION, NO PEAT, NO EXPLOITATION (NDPE) POLICY

This policy has been the core tenet of our overall Sustainable Palm Oil Policy since 2023. We have been committed to the NDPE policy since April 2020 and, to date, have maintained zero oil palm development on peat land.

- References the United Nations Universal Declaration on Human Rights
- Outlines our commitment to respecting the legal and customary land tenure rights of local and indigenous communities
- States our human rights commitments



### HEALTH & SAFETY POLICY

This policy guides our approach to workplace health and safety and has been in place since 2018. This policy was first reviewed in 2023 and will be reviewed periodically to ensure that it remains relevant with emerging health and safety concerns.



### HUMAN RIGHTS POLICY

This policy supports our commitment to recognising the rights of every individual and community we engage with, whether through employment, assistance, consultation or production partnership. Our engagement with employees, partners, suppliers and the communities we live with is ongoing and continuous, with the goal of providing every individual the opportunity to voice their concerns and grievances.

- References the United Nations Universal Declaration on Human Rights
- References the ILO Convention of Forced Labour No. 29, ILO Conventions of Child Labour No. 138 and 182, as well as the ILO Convention of Indigenous and Tribal Peoples No. 169



### ANTI-DISCRIMINATION & ANTI-HARASSMENT POLICY

This policy upholds the principle that all employees, regardless of race, religion or gender are guaranteed equal rights and opportunities based solely on merit and qualifications. We are also committed to safeguarding the privacy of our employees and protecting them from any form of harassment or bullying.

- References the ILO Discrimination (Employment and Occupation) Convention (1958) No. 111



### WHISTLEBLOWER POLICY

In line with best practices, GPSB ensures that whistleblowers are not subjected to any form of discrimination or retaliation when their actions are in the public interest and not driven by personal grievances.



### ANTI-BRIBERY & ANTI-CORRUPTION POLICY

This policy aims to ensure that any individual who has received or has been solicited for any form of gratification reports the matter in a timely manner.



### GIFT & ENTERTAINMENT POLICY

This policy expressly prohibits the acceptance of any form of gift or entertainment in exchange for special favours or preferential treatment.

*Our policies and FPIC procedures are publicly accessible at [www.glenealyplantations.com.my/sustainability.php](http://www.glenealyplantations.com.my/sustainability.php)*



## CODE OF CONDUCT

We are committed to upholding ethical and respectful conduct through well-defined guidelines across our operations. Since 2020, we have complied with the Anti-Bribery and Anti-Corruption Policy, Whistleblower Policy, Gift and Entertainment Policy and Anti-Discrimination and Anti-Harassment Policy.

We also maintain a Grievance Mechanism, allowing employees and community members to voice concerns confidentially and without fear of reprisal.

*For more information on GPSB's grievance mechanism and the related procedures, refer to **Protection of Human Rights** on page 30.*

*For more information on upholding integrity within our operations, refer to **Commitment to Anti-Corruption and Anti-Bribery Practices** below.*

## COMMITMENT TO ANTI-CORRUPTION AND ANTI-BRIBERY PRACTICES

Upholding anti-corruption and anti-bribery practices across our operations and business activities ensures legal compliance and maintains stakeholder confidence. It supports fair treatment, equal opportunity and ethical conduct in our value chain by promoting healthy competition among suppliers and reasonable pricing for customers. Additionally, it protects our business and employees from legal repercussions, reflecting our strong governance. This will not only improve operational efficiency but also boost investor confidence.

We adopt a zero-tolerance approach towards bribery and corruption, underpinning our commitment to ethical conduct and the prohibition of corruption. As part of responsible sourcing, we ensure that our suppliers uphold the same commitment by establishing clear policies and internal procedures to prevent, detect and address any form of corruption or bribery. This includes communicating the relevant policies to all our employees and suppliers.

### OUR POLICIES RELATED TO ANTI-CORRUPTION AND ANTI-BRIBERY:

- |  |                                     |   |
|--|-------------------------------------|---|
| • Anti-Bribery and Anti-Corruption Policy* | • Disciplinary Policy and Procedure | • Authorised Approval Limit               |
| • Gift and Entertainment Policy*           | • Procurement Procedure             | • Year-End Audit and Stock Take Procedure |
| • Whistleblower Policy*                    | • Tender Procedure                  |   |

*For more information on these policies\*, refer to [www.glenealyplantations.com.my/sustainability.php](http://www.glenealyplantations.com.my/sustainability.php)*

In 2024, we conducted policy training for all our employees. This included training sessions on the Anti-Bribery and Anti-Corruption Policy and the Gift and Entertainment Policy. We also constantly evaluate our suppliers via our estate and mill managers, who assess the suppliers' performance through a set of guiding questions. If a supplier's performance falls below expectations, the estate and mill managers will not recommend us to continue engaging them. During the year, all selected major suppliers successfully passed the evaluation.

## OUR PERFORMANCE IN FY2023/2024

COMMUNICATED OUR  
ANTI-CORRUPTION POLICIES  
AND PROCEDURES TO

**100%**  
SENIOR  
MANAGEMENT

**100%**  
EMPLOYEES

**100% BUSINESS  
PARTNERS**  
INCLUDING SUPPLIERS & VENDORS

ANTI-CORRUPTION  
TRAINING  
PROVIDED TO

**100%**  
SENIOR  
MANAGEMENT

**100%**  
EMPLOYEES

**ZERO** CONFIRMED INCIDENTS OF

BRIBERY & CORRUPTION

CONTRACTS TERMINATED/NOT RENEWED DUE  
TO VIOLATIONS RELATED TO CORRUPTION

PUBLIC LEGAL CASES REGARDING  
CORRUPTION BROUGHT AGAINST GPSB/  
GPSB EMPLOYEES

## GOING FORWARD

As we step into 2025, we are aware that strong policies alone are not enough. To uphold our commitment against bribery and corruption, we will focus on regular training and awareness for our people. We will also carry out due diligence on business partners and vendors, ensuring our disciplinary procedures are adhered to. This helps us keep our operations transparent and stay accountable to our stakeholders.

## ACCOUNTABILITY, OPENNESS, TRANSPARENCY AND TRACEABILITY

As an oil palm plantation company, ensuring accountability, openness, transparency and traceability is crucial to protect our reputation, improve market access and uphold the integrity of our supply chain. Trust in our operations strengthens confidence in our products, decisions and partnerships. This means clearer communication with communities, fairer treatment of employees, stronger relationships with suppliers and better compliance with regulatory expectations. Above all, it helps us support equality, uphold rights and create a workplace and value chain that are grounded in fairness and respect.

Guided by our Sustainable Palm Oil Policy, we comply with policies and practices that promote transparency and accountability across our operations. These include but not limited to the NDPE Policy and the Whistleblower Policy.

For more information on the **NDPE Policy and Whistleblower Policy**, refer to  
[www.glenealyplantations.com.my/sustainability.php](http://www.glenealyplantations.com.my/sustainability.php)

## DELIVERING ON OUR COMMITMENT

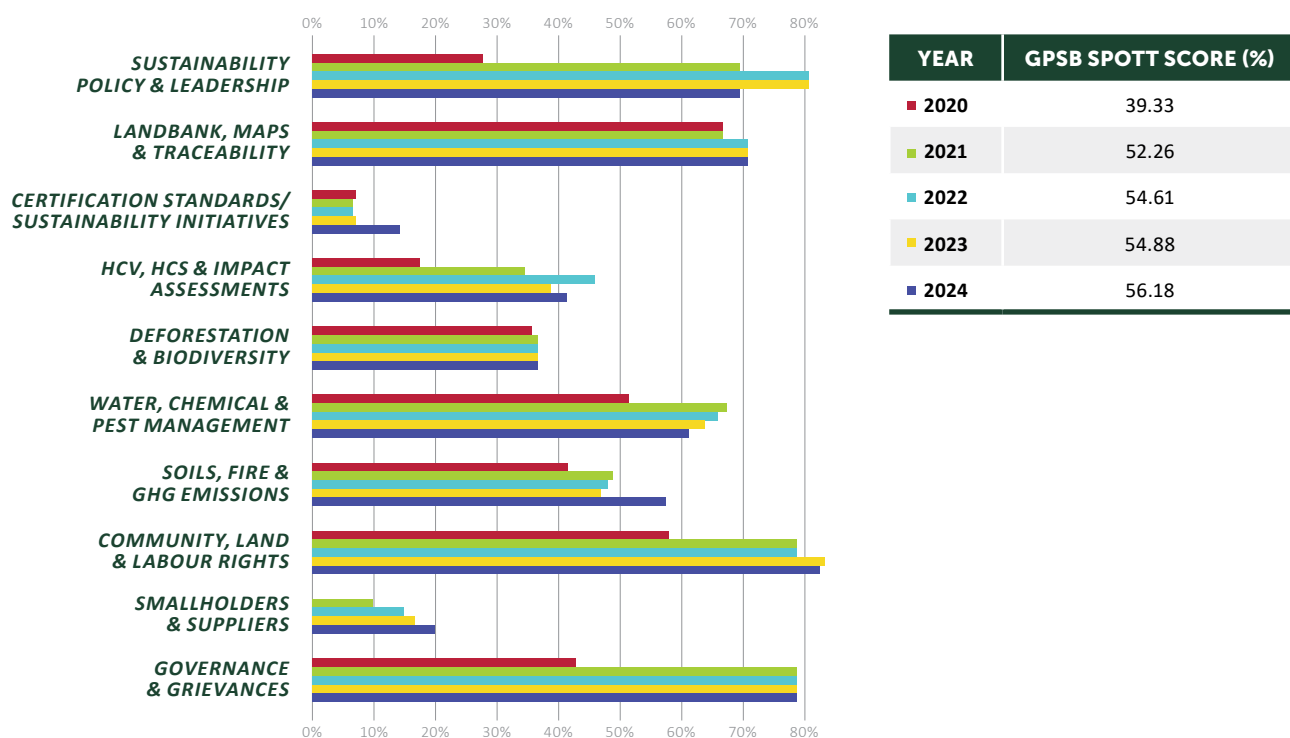
To deliver on our commitment to accountability, openness, transparency and traceability, we have taken several measures to enhance our efforts. Since 2020, we have published our sustainability report annually and participated in the Sustainability Policy Transparency Toolkit (SPOTT) assessment. Furthermore, we implement internal traceability procedures that align with the Malaysian Sustainable Palm Oil (MSPO) requirements. We also ensure that our corporate website remains updated and we hold an annual stakeholder meeting at the estate and mill level at each operational region. Additionally, employee training and capacity building are held every year.

## SUSTAINABILITY POLICY TRANSPARENCY TOOLKIT (SPOTT)

We began engaging with SPOTT in 2020, an initiative by the Zoological Society of London (ZSL) that assesses the transparency of companies in sectors such as palm oil, timber and natural resources. The platform evaluates the companies' ESG performance based on publicly available information. Since our first assessment, we have shown consistent progress, with our score improving from 39.33% in 2020 to 56.18% in 2024.

For more information, refer to [www.spott.org/palm-oil/glenealy-plantations-sdn-bhd/](http://www.spott.org/palm-oil/glenealy-plantations-sdn-bhd/)

## SPOTT SCORE ANALYSIS



## MALYSIAN SUSTAINABLE PALM OIL (MSPO) CERTIFICATION

We comply with the MSPO certification, a national standard that ensures palm oil is produced in a sustainable, responsible and traceable manner. Since MSPO certification became mandatory in 2020, we have implemented internal traceability procedures across our operations to meet its requirements.

All our palm oil mills and estates in Malaysia have been certified under the Malaysian Sustainable Palm Oil Supply Chain Certification Standard (MSPO SCCS) since January 2020. To ensure continuous compliance with the MSPO requirements, we conduct annual audits in all our mills and estates.

For more information on our **MSPO certifications**, refer to [www.glenealyplantations.com.my/prosperity.php](http://www.glenealyplantations.com.my/prosperity.php)

PLANTATION	CERTIFICATION	CERTIFICATE SERIES NO.	CERTIFIED DATE
BELAGA ESTATE (1, 2, 3)	MSPO:MS2530-3:2013	CU-MSPO-MS2530-3-879107	31 May 2019
BPOM	MSPO:MS2530-4:2013	CU-MSPO-MS2530-4-879107	
JELALONG (1, 2, 3, 4, 5, 6, 7)	MSPO:MS2530-3:2013	CU-MSPO-MS2530-3-879737	28 June 2019
JPOM	MSPO:MS2530-4:2013	CU-MSPO-MS2530-4-879737	
LANA (1, 2, 3, 4)	MSPO:MS2530-3:2013	CU-MSPO-MS2530-3-879061	26 Nov 2019
LPOM	MSPO:MS2530-4:2013	CU-MSPO-MS2530-4-879061	
TIMORA (TMR, PTS, AKB)	MSPO:MS2530-3:2013	CU-MSPO-MS2530-3-879057	30 Jan 2019
TPOM	MSPO:MS2530-4:2013	CU-MSPO-MS2530-4-879057	
PT ABDI BORNEO	ISPO	SPO.23082.TSI	8 Dec 2023
PT TUNAS BORNEO	ISPO	SPO-2303.TSI	
APOM	ISPO	SPO.23082.TSI	

In 2024, we began transitioning from the MSPO Standard MS2530:2013 to the updated MSPO Standard MS2530:2022. To this end, the Timora Complex has been certified under the updated MSPO Standard MS2530:2022. The Belaga Complex has also been audited from 22 to 24 April 2025 and the Jelalong Complex from 12 to 16 May 2025. Both are awaiting the issuance of the updated standard certification.

The audit for Lana Complex and the rest of the mills in Sarawak are scheduled to take place by October 2025.

As part of our commitment to transparency, four of our estates have received Gold Award at the 10th Premier of Sarawak Environmental Awards. In 2024, all 13 estates and three mills operating in Sarawak participated in the event.

## GOING FORWARD

Going forward, we will continue to strengthen our traceability system by leveraging on technology to ensure clear and reliable supply chain data. We will also maintain an open and accessible reporting channel under our Whistleblower Policy, which ensures anonymity. In addition, we will carry out regular internal audits to uphold our MSPO certification and ensure consistent MSPO and regulatory compliance across our operational sites.

## ENVIRONMENTAL COMPLIANCE

As a plantation company, environmental compliance is crucial for our operations. From ensuring proper land use to protecting conservation areas, environmental compliance not only helps us meet our regulatory obligations but is also key to maintaining our licence to operate and securing our ongoing permission to conduct business. Upholding environmental compliance keeps us aligned with our sustainability goals and supports our Protect the Natural Resources pillar.

For more information on our **Protect the Natural Resources** pillar, visit [www.glenealyplantations.com.my/protect.php](http://www.glenealyplantations.com.my/protect.php)

At GPSB, we adopt sustainable agricultural practices, as we strive to protect the environment and support the well-being of nearby communities. We are guided by the No Deforestation, No Peat and No Exploitation (NDPE) and Zero Open Burning principles, alongside practices such as pest management, biodiversity protection and efficient resource use.

## NDPE

We remain guided by the principles of Transparency, No Deforestation, No Peat and No Exploitation in our NDPE Policy. The policy applies across all GPSB-owned and managed oil palm plantations and mills. It also extends to our entire third-party Fresh Fruit Bunches supply network.

GPSB's **NDPE Policy** is available at [www.glenealyplantations.com.my/docs/news/Glenaely-Plantations-NDPE-Policy.pdf](http://www.glenealyplantations.com.my/docs/news/Glenaely-Plantations-NDPE-Policy.pdf)

## GOOD AGRICULTURAL PRACTICES

We continue to implement good agricultural practices across our operations, with a focus on soil management. This includes adhering to the Zero Open Burning policy during new planting. Our agricultural practices also emphasise minimising the use of chemicals and pesticides. These efforts help preserve biodiversity, enhance soil health and reduce the environmental impact of GPSB's agricultural activities.

Learn more about GPSB's **Good Agricultural Practices** at [www.glenealyplantations.com.my/prosperity.php](http://www.glenealyplantations.com.my/prosperity.php)

**ZERO OPEN BURNING POLICY**

We uphold a strict Zero Open Burning policy across all our plantation operations as part of our environmental stewardship efforts. During replanting, felled palm trunks are chipped and mulched on-site, then left to decompose naturally. This approach not only eliminates air pollution from burning but also contributes to soil health by retaining nutrients and supporting the organic balance of the land. Additionally, we prohibit the incineration of domestic waste and actively promote recycling and resource efficiency among our employees through ongoing education and awareness initiatives.

**INTEGRATED PEST MANAGEMENT (IPM)**

As part of our integrated pest management strategy, GPSB cultivates beneficial plant species including *Turnera subulata* and *Antigonon leptopus* to support natural predators. We have also installed artificial bird and owl nesting structures to enhance biological control. To minimise chemical inputs, a monitoring and population census programme ensures that pesticides and rodenticides are applied only when necessary and in minimal quantities.







**CARING FOR THE ENVIRONMENT THROUGH RESPONSIBLE STEWARDSHIP**

*Biodiversity Assessment and Conservation*

Our biodiversity assessment and conservation efforts remain an ongoing commitment. These initiatives include conducting ecological research, monitoring wildlife using camera trapping and managing conservation areas to preserve critical habitats and species.

In July 2024, GPSB embarked on a long-term biodiversity assessment and conservation plan, with a focus on areas within and adjacent to our oil palm plantations. This five-year plan aims to safeguard wildlife habitats, support the regeneration of native flora and integrate sustainable land-use practices. The plan also promotes community participation, environmental education and alignment with relevant policy frameworks such as GPSB’s Sustainable Palm Oil Policy.

To date, six areas have been identified under this commitment, each with specific mapping and defined boundaries. We comply with the MSPO Standards and uphold our relevant company policies to ensure lasting ecological impact, delivering measurable outcomes for ecosystem protection and species preservation.

CONSERVATION AREAS UNDER GPSB BIODIVERSITY ASSESSMENT AND CONSERVATION PLAN					
BELAGA (B2 CONSERVATION AREA) WITHIN OP	JELALONG EAST (J1 CONSERVATION AREA) WITHIN OP	JELALONG WEST (J5 CONSERVATION AREA) ADJACENT OP	LANA (L3 CONSERVATION AREA) ADJACENT OP	TIMORA (CONSERVATION AREA) WITHIN OP	AKB (BORA PROJECT) BOUNDARY OP
					
143 ha	30 ha	129 ha	86 ha	40 ha	5 ha

There are four core activities within our biodiversity assessment and conservation plan, each encompassing a range of sub-activities:

BASELINE DOCUMENTATION	HABITAT ENRICHMENT	ENVIRONMENTAL EDUCATION AND PUBLIC ENGAGEMENT	IMPACT EVALUATION AND MONITORING
<ul style="list-style-type: none"><li>• Camera Trapping</li><li>• Dragonfly &amp; Damselfly Study</li><li>• Avian Survey</li><li>• Flora Study</li><li>• Fish / Aquatic Study</li></ul>	<ul style="list-style-type: none"><li>• Tree Nursery Setup</li><li>• Tree Planting</li><li>• Food Provision</li></ul>	<ul style="list-style-type: none"><li>• Educational Trail Establishment</li><li>• Student Internship</li></ul>	<ul style="list-style-type: none"><li>• Evaluation Assessment</li></ul>

## Camera Trapping

Since July 2021, we have used camera trapping as a non-invasive method to monitor wildlife in conservation areas. These motion- or heat-sensitive cameras capture images or videos of animals with minimal disturbance, helping us to identify species, assess population sizes and detect threats such as poaching. The data collected supports GPSB's biodiversity conservation and guides strategies to protect endangered species and habitats.

**32** total faunal species recorded across six conservation areas

**23**

**MAMMALS**

**7**

**BIRDS**

**2**

**REPTILES**

**27** species visible via camera traps with 5 mammal species detected:

- **Sambar Deer**  
*Rusa unicolor*
- **Bearded Pig**  
*Sus barbatus*
- **Bornean Yellow Muntjac**  
*Muntiacus atherodes*
- **Sun Bear**  
*Helarctos malayanus*
- **Pig-tailed Macaque**  
*Macaca nemestrina*

### Figs & Pigs: Monitoring Bornean Bearded Pig Recovery with Camera Traps

On 30 September 2024, a collaborative recovery programme was launched between GPSB and our long-term partner, Borneo Rhino Alliance (BORA) to support the endangered Bornean bearded pig, whose numbers have been severely impacted by African swine fever. The programme centred around a 40-hectare forest patch within the HCV area of Timora Estate in Lahad Datu, Sabah.

The initiative aimed to manage the Bornean bearded pigs within the HCV forest patch at the Timora Estate, with the goal of boosting births and population numbers. The surplus pigs will then be supplied to other sites in Sabah for rewilding efforts, particularly in areas where the species has become locally extinct.

Since the project's approval in September 2024, BORA has conducted camera trap surveys and installed mineral blocks and food sources, while GPSB continues to support feeding efforts through on-site food containers.

**13** mammal species identified as Rare, Threatened or Endangered based on IUCN Red List

LOCAL NAME	SCIENTIFIC NAME	ESTATE	IUCN STATUS
Bearded Pig	<i>Sus barbatus</i>	B, J, L, T	Vulnerable (VU)
Sambar Deer	<i>Rusa unicolor</i>	B, J, T	Vulnerable (VU)
Bornean-yellow Muntjac	<i>Muntiacus atherodes</i>	B, J, L	Near Threatened (NT)
Mousedeers	<i>Tragulus spp</i>	B, J, L, T	Least Concern (LC)
Long-tailed Macaque	<i>Macaca fascicularis</i>	B, J, T	Vulnerable (VU)
Short-tailed Macaque	<i>Macaca nemestrina</i>	B, J, L, T	Vulnerable (VU)
Bornean Sun Bear	<i>Helarctos malayanus</i>	J	Vulnerable (VU)
Banded Palm Civet	<i>Hemigalus derbyanus</i>	J	Near Threatened (NT)
Malay Civet	<i>Viverra zangalla</i>	B, J, T	Least Concern (LC)
Asian Palm Civet	<i>Paradoxurus hermaphroditus</i>	J	Least Concern (LC)
Binturong	<i>Arctictis binturong</i>	J	Vulnerable (VU)
Otter-Civet	<i>Cynogale bennettii</i>	J	Endangered (EN)
Malay Weasel	<i>Mustela nudipes</i>	J	Least Concern (LC)
Yellow-throated Marten	<i>Martes flavigula</i>	J, B	Least Concern (LC)
Short-tailed Mongoose	<i>Urva brachyurus</i>	J, B	Near Threatened (NT)
Semi-collared Mongoose	<i>Urva semitorquatus</i>	J	Near Threatened (NT)
Sunda Stink Badger	<i>Mydaus javanensis</i>	T	Least Concern (LC)
Marbled Cat	<i>Pardofelis marmorata</i>	J	Near Threatened (NT)
Leopard Cat	<i>Prionailurus bengalensis</i>	B, J, T	Least Concern (LC)
Common Porcupine	<i>Hystrix brachyura</i>	B, J, L, T	Least Concern (LC)
Thick-spined Porcupine	<i>Hystrix crassispinis</i>	B, J, L, T	Least Concern (LC)
Long-tailed Porcupine	<i>Trichys fasciculata</i>	B, J	Least Concern (LC)
Tufted-ground Squirrel	<i>Rheithrosciurus macrotis</i>	J	Vulnerable (VU)

Refer to our **Camera Trapping Summary** for detailed insights at [www.glenealyplantations.com.my/camtrapsum](http://www.glenealyplantations.com.my/camtrapsum)

View our **Camera Trapping Report and Gallery** at [www.glenealyplantations.com.my/camtrapregal](http://www.glenealyplantations.com.my/camtrapregal)





Dragonfly survey and assessment at Belaga

### Dragonfly and Damselfly Study

In May and December 2024, we conducted a study on dragonflies and damselflies in two oil palm conservation areas to monitor biodiversity and assess overall ecosystem health. These species serve as bioindicators, reflecting water quality, habitat conditions and the ecological impact of oil palm cultivation practices.

**53** species of Odonata from 12 families were recorded in the Belaga HCV

**20** species were recorded for the first time in the Belaga District

**5** species were recorded for the first time in the Kapit Division:

- *Archibasis tenella*
- *Archibasis viola*
- *Oligoaeschna platyura*
- *Pornothemis serrata*
- *Rhyothemis aterrima*

**4** species are possibly worthy of special conservation attention

SCIENTIFIC NAME	IUCN STATUS
<i>Coellicia kenyah</i>	Near Threatened (NT)
<i>Oligoaeschna platyura</i>	Currently Vulnerable (VU) and only one other location has been recorded for it in Sarawak. If the species found in May 2024 is not <i>O. platyura</i> then it is either the even more poorly known <i>O. mutata</i> (also VU) or a new species
<i>Macromia corycia</i>	Near Threatened (NT)
<i>Pornothemis serrata</i>	Data Deficient (DD) but needs reassessment and is very unlikely to be LC

View our (Belaga) Odonata Survey Report and Gallery at

[www.glenealyplantations.com.my/docs/sustain/2024/Belaga\\_Odonata\\_Report\\_2024\\_v1.1.pdf](http://www.glenealyplantations.com.my/docs/sustain/2024/Belaga_Odonata_Report_2024_v1.1.pdf)

**71** species of Odonata from 15 families were recorded in the Jelalong East HCV

**6** species were recorded for the first time in the Sebauh District

**1** species were recorded for the first time in the Bintulu Division:

- *Drepanosticta attala*

**5** species are possibly worthy of special conservation attention

SCIENTIFIC NAME	IUCN STATUS
<i>Drepanosticta attala</i>	Least Concern (LC) but Jelalong East 3 site is the only location known for the species in Bintulu Division
<i>Rhinocypha aurofulgens</i>	Least Concern (LC) but very rare in Bintulu Division, with only one (very old) record from the division until now
<i>Heliogomphus borneensis</i>	Near Threatened (NT)
<i>Macromia corycia</i>	Near Threatened (NT)
<i>Phyllothemis raymondi</i>	Data Deficient (DD), a hyper-localised species

View our (JE) Odonata Survey Report & Gallery at [www.glenealyplantations.com.my/odonatasurveyregal](http://www.glenealyplantations.com.my/odonatasurveyregal)

## Avian Survey

To assess and enhance avian biodiversity in areas surrounding our oil palm plantations, we conducted a bird survey in July 2024 and March 2025. The survey provided baseline data on bird species diversity, which provides us a reference point to track ecological changes.

**23 species of birds were observed**  
at Jelalong West (J5 HCV area, Adjacent OP)

**12 species recorded**  
by using audio or visual by binoculars

**11 species recorded**  
by using mist netting method

**3 species fall under**  
**Nearly Threatened (NT)**

**3 species fall under**  
**Vulnerable (VU)**

**4 species listed in Appendix II under CITEC list,**  
while the rest of species are listed as Least Concern (LC)



LOCAL NAME	SCIENTIFIC NAME	FAMILY	IUCN STATUS
Red-eyed Bulbul	<i>Pycnonotus brunneus</i>	<i>Pycnonotidea</i>	Least Concern (LC)
Finch Bulbul	<i>Criniger finschii</i>	<i>Pycnonotidea</i>	Least Concern (LC)
Hairy-backed Bulbul	<i>Tricholestes criniger</i>	<i>Pycnonotidea</i>	Least Concern (LC)
Cream-vented Bulbul	<i>Pycnonotus simplex</i>	<i>Pycnonotidea</i>	Least Concern (LC)
Yellow-bellied Bulbul	<i>Criniger phaeocephalus</i>	<i>Pycnonotidea</i>	Least Concern (LC)
Rufous-chested Flycatcher	<i>Ficedula dumetoria</i>	<i>Muscicapidea</i>	Least Concern (LC)
Maroon Woodpecker	<i>Blythipicus rubiginosus</i>	<i>Picidea</i>	Least Concern (LC)
Buff-necked Woodpecker	<i>Meiglyptes tukki</i>	<i>Picidea</i>	Near Threatened (NT)
Black-backed Kingfisher	<i>Ceyx rufidorsa</i>	<i>Alcedinidae</i>	Near Threatened (NT)
Black-naped Monarch	<i>Hypothymis azurea</i>	<i>Monarchidea</i>	Least Concern (LC)
Rufous-tailed Tailorbird	<i>Orthotomus sericeus</i>	<i>Tailorbirds</i>	Least Concern (LC)

View our **(JW) Avian Survey Report and Gallery** at  
[www.glenealyplantations.com.my/aviansurveyrepgal](http://www.glenealyplantations.com.my/aviansurveyrepgal)  
[www.glenealyplantations.com.my/belagaaviansurveyrep](http://www.glenealyplantations.com.my/belagaaviansurveyrep)

To learn more about the Rare, Threatened and Endangered (RTE) species we monitor, please refer to our  
**RTE species list** available at: [www.glenealyplantations.com.my/rtespecieslist](http://www.glenealyplantations.com.my/rtespecieslist)

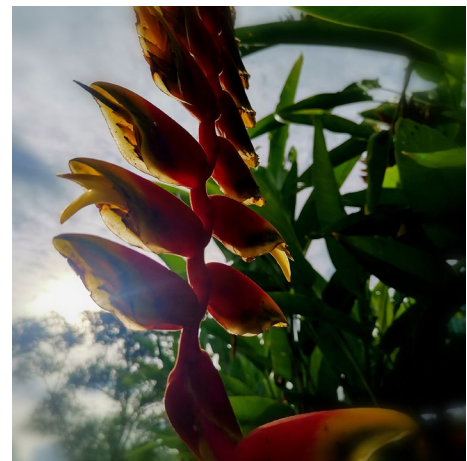
### Flora Study and Educational Trail Establishment

The Flora Study and Educational Trail Establishment is a dual-purpose initiative aimed at both preserving plant biodiversity and promoting environmental education. Held in July 2024, the project enabled us to identify and catalogue plant species, assessing their ecological value and establishing a baseline for future conservation efforts.

Additionally, the educational trail, designed with interpretive signage and learning stations, provides visitors to our conservation areas with insights into significant plant species, their ecological relationships and conservation efforts. It aims to facilitate guided tours and educational programmes for various groups, including schools and universities.

**172 trees from 33 families, 59 genera and 101 species** were identified during the study, spanning over five kilometres at Jelalong West (J5 HCV area, Adjacent OP)

**5 species categorised as Critically Endangered (CR)** were found along the Educational Trail



View our (JW) Flora Survey Report and Gallery at [www.glenealyplantations.com.my/florasurveyrepgal](http://www.glenealyplantations.com.my/florasurveyrepgal)

### Belaga Recovery Project

Since 2020, we have implemented the Belaga Recovery Project, which comprises various social and environmental programmes. Initiatives such as stakeholder engagement, social study engagement and biodiversity assessments have been carried out to compensate for the loss of High Carbon Stock areas. Our Preliminary Biological Assessment Report was released in 2022, followed by the Biological Resources Assessment Report in October 2024.

For more information about our **Belaga Recovery Project**, refer to [www.glenealyplantations.com.my/protect.php](http://www.glenealyplantations.com.my/protect.php)

### Fig Trees Planting

From October to November 2024, we began planting fig trees within the degraded zone of the Belaga Recovery Project area. This Fig Trees Planting initiative within the GPSB's Conservation Areas aims to enhance wildlife habitats by cultivating fig trees, which serve as a sustainable food source and help enrich the soil. Among the key activities included propagation, planting, maintenance, monitoring and community engagement to promote biodiversity conservation awareness and environmental stewardship.

**6 tree/fig tree nurseries** are in the following conservation areas:

- Belaga (B2 HCV area) Within OP
- Jelalong East (J1 HCV area) Within OP
- Jelalong West (J5 HCV area) Adjacent OP
- Lana (L3 HCV Area) Adjacent OP
- Timora (HCV Area) Within OP
- AKB (BORA Project) Boundary OP

**Fig trees planting activities were carried out in the following conservation areas:**

- Belaga (B2 HCV area) Within OP
- Jelalong East (J1 HCV area) Within OP
- Jelalong West (J5 HCV area) Adjacent OP
- Lana (L3 HCV Area) Adjacent OP
- AKB (BORA Project) Boundary OP



## EFFLUENT AND WATER MANAGEMENT

We strive to reduce and minimise our water consumption across all operations to support sustainable resource management. One of our key initiatives includes the ongoing harvesting and utilisation of rainwater, which helps to lessen our reliance on municipal tap water and reduce environmental impact.

Additionally, we remain compliant with the Department of Environment's (DOE) regulations, ensuring that the final discharge of effluent water from our mills is recorded below 20 ppm.

We began measuring our water consumption in our FY2023 reporting. In 2024, our water consumption increased by 2.8%.

	2023 (FY2022/2023)	2024 (FY2023/2024)
Total Water Consumption (ℓ)	1,061,861,201	1,091,443,127

## WASTE MANAGEMENT

Effective waste management is fundamental to our commitment to sustainable palm oil production. We understand that improper waste disposal can cause significant environmental harm and adversely affect the health of communities in the areas where we operate.

We strictly adhere to the Zero Open Burning policy, which prohibits domestic waste burning and ensures that all scheduled waste is disposed of responsibly through licenced contractors. We also continue to promote the 3R principles—Reduce, Reuse and Recycle as an integral component of our comprehensive waste management programme.

Scheduled Waste (Disposal by Licensed Contractor)	2023 (FY2022/2023)	2024 (FY2023/2024)
Used Oil (kg)	39,132	30,332
Used Battery (kg)	5,147	3,786
Contaminated Rags & Filter (kg)	7,048	4,005
Contaminated Containers (kg)	1,757	2,029
Contaminated Used Spill Kit (kg)	701	581
Clinical Waste (kg)	216	178

Recyclable Waste (Sell/Dispose to Recycle Centre)	2023 (FY2022/2023)	2024 (FY2023/2024)
Used Tyres (pieces)	769	574
Recycle Plastic Bottles & Containers (kg)	4,390	11,901
Recycle Cans (kg)	363	1,291

## Palm Oil Mill By-Product Management

**2024**  
(FY2023/2024)

Empty Fruit Bunch (EFB) (Mt) - <i>Incinerator Fuel</i>	64,125
Empty Fruit Bunch (EFB) (Mt) - <i>Boiler Fuel</i>	24,305
Empty Fruit Bunch (EFB) (Mt) - <i>Mulching</i>	45,367
Palm Kernel Shell (PKS) (Mt) - <i>Sell</i>	1,284
Palm Kernel Shell (PKS) (Mt) - <i>Boiler fuel</i>	24,499
Oil Palm Fruit Mesocarp Fiber (Mt) - <i>Boiler Fuel</i>	87,462
Palm Oil Mill Sludge (Mt)	15
Incinerator Bunch Ash (Mt) - <i>Sell &amp; Own Consumption</i>	1,466
Plam Oil Mill Effluent (POME) (m <sup>3</sup> ) - <i>Treated Volume</i>	463,913
Decanter Cake (Mt) - <i>Disposal at Estate</i>	15,375
Final Discharge of Wastewater (m <sup>3</sup> )	412,370

## Domestic waste

**2024**  
(FY2023/2024)

Domestic Waste for Landfill (Mt per year)

Approximately 900

### GPSB RACE TO ZERO WASTE

We launched a six-month recycling campaign from 16 August 2023 to 29 February 2024, themed "GPSB Race to Zero Waste". The campaign aimed to reduce environmental impact and foster recycling habits within our plantation communities.

The initiative included a competitive element, with participants rewarded based on the weight of recyclables collected and sold. All GPSB Sarawak-based oil palm estates and mills were encouraged to collect recyclable waste, such as plastic bottles, aluminium cans and used paper and sell it to local recycling centres, instead of sending it to landfills.



**8,706 kg**  
plastic bottles/  
containers



**1,224 kg**  
aluminium cans

**RM11,312** collected through  
the campaign  
& channelled into workers' welfare activities

## ENERGY MANAGEMENT

GPSB's energy sources comprise self-generated electricity, diesel and renewable energy. Our diesel consumption increased in 2024 due to higher production levels compared to 2023. Our renewable energy is mostly from solar-powered lighting and as of June 2024, we have installed 624 units of solar street lighting.

	<b>2023</b> (FY2022/2023)	<b>2024</b> (FY2023/2024)
Total Diesel Consumption (ℓ)	5,728,962.3	6,029,403.26

	<b>2023</b> (FY2022/2023)	<b>2024</b> (FY2023/2024)
Total Electricity Consumption (kWH)	21,390,036	20,928,665

## GREENHOUSE GAS (GHG) EMISSIONS

GHG emissions are a major cause of global warming, which have accelerated climate change. This has impacted the natural ecosystems and communities worldwide, affecting global supply chains and even livelihoods. As part of the plantation industry, we recognise our responsibility to reduce our carbon footprint through sustainable management and to safeguard forest areas. At the same time, we must adapt to climate change by using climate-resilient varieties and optimising resource use.

At Lana Mill, we have installed and are conditioning an Electrostatic Precipitator (ESP) to reduce the release of particulates into the atmosphere, in compliance with state DOE regulations. Similarly, our other mills, namely Belaga Palm Oil Mill, Jelalong Palm Oil Mill and Timora Palm Oil Mill, are in the process of installing wet scrubbers to minimise the release of dust particles into the atmosphere.

## GOING FORWARD

Our GHG emissions are currently measured based on the MSPO GHG calculator. Going forward, we aim to start collecting our GHG emissions data according to the GHG Protocol Corporate Accounting and Reporting Standard. We are also enhancing our internal capacity to ensure consistent and transparent disclosures. In line with this, we are preparing to align our reporting with the Task Force on Climate-related Financial Disclosures (TCFD) recommendations in the next reporting cycle.

## PROTECTION OF HUMAN RIGHTS

As an organisation with labour intensive operations, it is crucial for us to safeguard human rights. We are committed to protecting the rights of our employees, workers and the local communities whose lives and livelihood are impacted by our operations. Upholding human rights secures our licence to operate and ensures smooth daily operations, enabling us to not only create continuous business value but also enhance the quality of life of the local communities, such as providing infrastructures and amenities. Our human rights practices include providing employees and workers a safe and healthy work environment, fair wages and better living conditions, which will boost productivity and retain our talent.

We comply with local and international human rights laws and regulations to ensure our continued access to a wider range of global markets. Furthermore, it strengthens our reputation as a responsible palm oil plantations operator, which is reflected through our enhanced ESG scores and ratings that solidify consumer trust and investor confidence.

We remain guided by our Sustainable Palm Oil Policy, the NDPE, Human Rights Policy and Anti-Discrimination and Anti-Harassment Policy.

## DISCRIMINATION AND HARASSMENT

We do not tolerate discrimination and harassment. Employees who wish to lodge a complaint may do so via our reporting channels as shown below and they are protected by our Whistleblower Policy, which ensures anonymity. Reports may be filed through a grievances/requests form, or mailed to the following addresses:

### Email



info@glenealyplantations.com.my

### Address



**Glenealy Plantations Sdn Bhd**  
P.O. Box 12053,  
50766 Kuala Lumpur

All reports are treated confidentially, with information disclosed on a need-to-know basis. In 2024, there were zero cases of discrimination and human rights violation reported. Our grievance handling procedure and record are published on [www.glenealyplantations.com.my/care.php](http://www.glenealyplantations.com.my/care.php).



## **EQUAL TREATMENT**

We have established a Gender Committee to lead and implement our Gender Policy. The committee endeavours to promote the participation of women in leadership positions at all levels of the organisation and combat sexual harassment, as well as other forms of violence against women. The committee's initiatives to support the advancement of women include providing mentorship programmes and cooperative business opportunities for women in our workforce. This includes opening a stall on payday to sell food and vegetables to workers, using the proceeds raised to fund the committee.

## **COLLECTIVE BARGAINING**

At GPSB, 100% of our employees are covered by collective bargaining agreements. Our mills and estates have established joint employee-management committees that meet every six months. During these meetings, representatives of management and employees discuss their concerns involving their work environment and other matters that could affect the performance of their tasks.

## **MITIGATING RISKS OF CHILD AND FORCED LABOUR**

We adopt a zero-tolerance approach against the use of child labour and forced labour. We have implemented proactive measures to mitigate these risks by prohibiting the recruitment of workers below 18 years old in all our estates and mills.

To raise awareness, we have installed signages around workplaces and housing areas that clearly state our stance against child labour. Furthermore, we encourage children and underaged individuals to pursue their education by establishing community learning centres in local communities.

To avoid forced or bonded labour, we comply with ethical recruitment practices such as not withholding workers' passports or imposing recruitment fees. We ensure that all workers are in possession of their own identification documents. In addition, employment contracts are written in a clear manner, in compliance with legal and regulatory requirements. While the contracts are written in Bahasa Malaysia, we ensure that their terms are explained to the workers in languages they understand.

Internal and external audits are conducted periodically across our operations and supply chain, as per the MSPO Standard MS2530, to monitor labour conditions and identify risks of forced labour. To prevent exploitative conditions, we enforce standard operating procedures (SOPs) to ensure that working hours and wages comply with legal requirements, such as the national minimum wage. Additionally, we pay wages on time and offer overtime pay to eligible employees.

We work closely with government labour departments to ensure our practices consistently meet legal requirements. Workers may report their grievances through our grievances/request form. Concerns raised are communicated to our Board during business performance review meetings.

## **DIGNIFIED LIVING**

We believe in offering our employees and local communities the opportunity to earn a dignified living. This is also aligned with the MSPO certification requirements.

Providing fair wages, adequate amenities and facilities to our employees is fundamental to ensuring their overall well-being, improving their quality of life and creating a conducive work environment. It also increases productivity and reduces turnover by improving their motivation levels.

We adhere to the legal minimum wage in the countries where we operate, ensuring they are disbursed in a timely manner. Moreover, we provide them with the necessities to ensure decent living conditions, such as housing, sanitation, clean water, health care and electricity.

Full-time employees are eligible for the following benefits:

- Free housing
- Free electricity
- Free treated water
- Free healthcare at estate clinics
- Hospitalisation
- SOCSO and EPF contributions
- Annual leave
- Time off on public holidays
- Parental leave
- Sick leave
- Operational incentives such as bonuses for additional FFB harvested

Beyond our employees, we offer employment opportunities to the communities nearby, including contract work for construction and road works. To upskill the local communities, we provide training on good agricultural practices during stakeholder engagement sessions. Additionally, we have collaborated with the Department of Agriculture and Universiti Putra Malaysia to teach indigenous women make pineapple jam and compost.

*For more information on employment for local communities, refer to **Protection of Local Communities** on page 36.*

## PROMOTING DIVERSITY AND INCLUSION

Our senior management represents our highest governing body. In FY2023/2024, women accounted for 5% of our senior management while the remaining 95% were men.

Across our organisation, workers comprise the majority of our workforce due to the physical nature of our operations, with female workers representing 28% of our overall employees. At the non-management level, women comprise almost half of our employees.

### Number of Employees by Employee Category



### Number of New Hires and Turnover

	2023 (FY2022/2023)	2024 (FY2023/2024)
Total employees hired	1,862	1,427
Total employees turnover (including foreign workers)	1,660	1,329

## NURTURING OUR HUMAN CAPITAL

A skilled workforce is vital for our continued success. We provide our employees with opportunities to grow their careers through training to upskill themselves and ensure they remain competitive. We also conduct annual performance review to help them improve and work on their strengths and weaknesses.

During FY2023/2024, GPSB recorded 41,739 training hours, with 8.6 hours of average training per employee per year.

Training is tailored to the various roles to ensure relevance, covering the essential skills required for performing daily tasks safely and effectively, ensuring organisational compliance with applicable laws and regulations, as well as driving sustainability throughout the organisation.

TRAINING TOPICS	NUMBER OF PARTICIPANTS
<ul style="list-style-type: none"> <li>Standard operating procedures (SOPs) for harvesting, manuring, weeding and spraying</li> <li>Health and safety</li> <li>Fire drills</li> </ul>	All operational employees
<ul style="list-style-type: none"> <li>Replanting SOPs</li> <li>Upkeep of immature palm trees</li> <li>Supervisory skills</li> <li>Health, safety and environment training</li> <li>Malaysian Sustainable Palm Oil (MSPO)</li> <li>Environment, social and governance (ESG)</li> </ul>	About 250
<ul style="list-style-type: none"> <li>Labour laws</li> <li>Managing employee performance and disciplinary issues</li> <li>ESG matters at the workplace</li> </ul>	30

In the year under review, 100% of our employees were appraised for their performance. As part of our inclusive employment practices, estate and mill workers received incentives and bonuses based on their performance.

We also seek to foster unity and stronger relationships through sport and team building events. These activities build trust and camaraderie, while strengthening problem-solving skills and mutual respect, which are foundational for creating a more cohesive and motivated workforce. We conduct sporting activities at the group, centre and mill/estate level.

## GOING FORWARD

We will continue to prioritise the welfare of our estate and mill workers by ensuring all their basic needs are met. In addition, we are working towards full compliance with Sarawak and Sabah's Labour Ordinances and a 100% legal workforce, from our current rate of over 90%. We will also drive sustainability across our supply chain through regular engagement with our suppliers, contractors and smallholders to promote the adoption of ESG practices.

*Refer to **Employee Occupational Safety and Health** below for more information on our approach to health and safety.*

## EMPLOYEE OCCUPATIONAL SAFETY AND WELL-BEING

Safety, health and well-being is fundamental to the success of our operations. A secure work environment boosts productivity by enhancing employee satisfaction and morale, while reducing workplace disruptions, absenteeism, medical leave and turnover. In addition, complying with legal and regulatory safety requirements enables us to mitigate regulatory risk, while ensuring our continued operations.

A failure to prevent workplace accidents can result in lost manhours, medical expenses and compensation claims, raising insurance costs and the risk of lawsuits.

Our commitment to workplace health and safety across our operations does not only safeguard our reputation but also benefit our local communities. By upholding high safety standards, our employees and contract workers can go to work with confidence and go home safely, with their safety and well-being assured.

Our approach is guided by our Health and Safety Policy, which outlines our commitment to implementing safe work systems, enabling our operations to minimise health and safety risks. The policy complies with the Occupational Safety and Health (Amendment) Act 2022 and other relevant industry and international standards. The policy can be accessed via [www.glenealyplantations.com.my/sustainability.php](http://www.glenealyplantations.com.my/sustainability.php).

## MANAGING OCCUPATIONAL SAFETY AND HEALTH

We have implemented an OSH management system (OSHMS) that adheres to the Occupational Safety and Health (Amendment) Act 2022 (OSHA) and industry best practices. Developed to identify, assess and control workplace hazards, it aims to ensure the safety and well-being of our employees and stakeholders. The OSHMS is guided by our Health and Safety Policy and aligns with our OSH guidelines and procedures, which cover:

- A hazard identification, risk assessment and risk control (HIRARC) framework
- Safe Work Procedure for all tasks and jobs
- OSH committees
- Chemical management
- Personal protective equipment
- Emergency response
- Incident reporting and investigation
- Drug testing
- Health, safety and environment (HSE) programmes at the workplace and labour quarters

Our OSHMS covers all employees, workers who are not employees, but whose work is controlled by our company, as well as all contractors and visitors on our premises. It undergoes periodic audits internally and externally by the MSPO, to ensure we conform with Principle 4 of The Revised MSPO Standards MS2530:2022—Responsible to Social, Health, Safety and Employment. The OSHMS covers the following:

PEOPLE	ACTIVITIES	WORKPLACE
<ul style="list-style-type: none"><li>• Full-time and temporary employees</li><li>• Field and factory workers</li><li>• Contract workers</li><li>• Subcontractors</li><li>• Visitors</li></ul>	<ul style="list-style-type: none"><li>• Oil palm plantation and milling work</li><li>• Processing</li><li>• Storage</li><li>• Transporting, maintenance and operation of machinery and equipment</li><li>• Administrative and support functions</li></ul>	<ul style="list-style-type: none"><li>• Oil palm plantations</li><li>• Milling sites and associated facilities</li><li>• Workshops</li><li>• Offices</li><li>• Housing</li><li>• Roads within the operation premises</li></ul>

## MITIGATING AND INVESTIGATING INCIDENTS

We conduct HIRARC assessments to identify hazards and establish risk controls. The process, which adheres to the Department of Safety and Health's (DOSH) HIRARC guidelines, enables us to reduce workplace health and safety incidents. Conducted under the guidance of safety and health officers, HIRARC is carried out by qualified personnel, including trained OSH coordinators, managers and field supervisors.

To ensure compliance with the MSPO standards, our HIRARC process undergoes an annual surveillance audit. Additionally, the process is regularly reviewed and updated when there are changes to our operations and accidents reported.

Workers may directly report workplace hazards to their *mandor*, supervisor, OSH coordinator or manager. Other avenues to raise concerns include OSH committee meetings, morning muster sessions, daily toolbox meetings, GPSB's grievance mechanism and OSH awareness training. In addition, employees also have the right and responsibility to stop work should they encounter a hazardous situation that poses an immediate danger to their health and safety. All our workers are protected against reprisals while exercising this right.

We have put in place an incident reporting and investigation procedure, which outlines the roles and responsibilities of the estate or mill personnel during the incident reporting process. The procedure also includes guidelines for determining the root cause of an incident and implementing the correct and preventive action based on the hierarchy of control.

## PROMOTING HEALTH AND FITNESS AT WORK

To ensure a safer and healthier workplace, GPSB provides pre-employment medical tests. Employees and workers who are exposed to chemical at work are eligible for annual medical examinations according to the DOSH's Chemical Health Risk Assessment (CHRA). We also provide healthcare facilities, including six clinics manned by qualified medical assistants and first aid facilities. Additionally, some estates are also equipped with ambulances.

Furthermore, employees may receive healthcare services from GPSB’s panel doctors and general hospitals, in addition to undergoing regular health screenings. To enhance the well-being of our employees, we conduct medical check-ups focused on tracking blood pressure and glucose levels, as well as body mass index (BMI). During our health campaign, we organised a weight loss challenge to improve the BMI of our employees. We treat the medical information of our employees with utmost confidentiality, using it only for official purposes such as work permit renewals. Our workers are treated fairly, irrespective of their medical status, in accordance with our Human Rights Policy.

**ENGAGING WITH EMPLOYEES ON OSH MATTERS**

In compliance with the law, we ensure an OSH committee is developed in every estate and mill. The functions of the OSH committee members are according to the Occupational Safety and Health (Safety and Health Committee) Regulations 1996 and our OSH committee procedures.

Employees are welcome to engage with the management on safety and health matters during OSH committee meetings in the mills and estates. These include joint employee-management meetings, daily morning muster safety briefings, toolbox talks and safety campaigns.

In addition, employees are invited to participate in the HIRARC and safe work procedure (SWP) processes, accident investigations and walkabout inspections. They are also encouraged to suggest health and safety related topics to be addressed in training.

**PROVIDING OSH TRAINING**

As part of our risk mitigation, we equip our people with the necessary skills and knowledge to respond to workplace incidents. Our training encompasses the following:



Plantation field and milling safe work procedures that cover all operational activities



Emergency response and planning



First aid course



OSH-related procedures and guidelines



OSH-related legal requirements



OSH policy



Safety committee functions



Generic safety topics

Slip, trip and fall

Working at heights

Chemical safety

Noise hazards

Power tools and hand tools safety

Fire safety

Waste handling and disposal

Besides employee engagement on health and safety matters, we have also provided training for employees to qualify as OSH coordinators since 2008. Each estate and mill has at least one OSH coordinator.

## DOCUMENTING WORK-RELATED INJURIES AND ILL HEALTH

During the period under review, there were zero incidents of fatalities, high-consequence work-related injuries and recordable work-related injuries and ill-health.

While this was an improvement from one fatality the year before, the number of work-related injuries rose to 44 in 2024 from 20 in 2023 and 18 in 2022. This was primarily due to newly hired workers who lacked experience and exposure to the work environment and safety procedures. To address the issue, we have strengthened training programmes, increased the frequency of safety briefings and implemented tighter supervision and mentoring to create a safer workplace. Our safety performance rates were calculated based on 1,000,000 hours worked.

The main injuries recorded at our workplace are caused by sharp tools such as harvesting sickles and machetes, or oil palm thorns. To mitigate and minimise such incidents, we have taken safety measures such as inspecting sharp tools prior to use, providing covers for these tools and offering training for proper harvesting and cutting techniques. These are in addition to conducting daily safety reminders and briefings before work begins.

Work-related injuries	2022 (FY2021/2022)		2023 (FY2022/2023)		2024 (FY2023/2024)	
	No.	Rate	No.	Rate	No.	Rate
<b>All employees</b>						
Fatalities as a result of work-related injury	0	0	1	0.78	0	0
Recordable work-related injuries	18	1.500	20	1.562	40	3.584

	2022 (FY2021/2022)	2023 (FY2022/2023)	2024 (FY2023/2024)
Number of hours worked	12,003,264	12,806,976	12,275,328

## GOING FORWARD

We aim to maintain zero fatalities and zero citations under the OSHA, as well as reducing lost time injury rate (LTIR) per 1,000 workers every year. Towards these ends, we will continue to refine our OSHMS by reviewing and updating our HIRARC process, enhancing safety training and awareness programmes, adhering to high auditing standards and ensuring OSH coordinators in all estates and mills.

## PROTECTION OF LOCAL COMMUNITIES

At GPSB, we work closely with the communities around our operations to build long-term relationships. Forging close ties with the local communities enables us to meet their needs, reduce environmental and social harm and create positive impact where we operate.

We remain guided by our Sustainable Palm Oil Policy, the NDPE Policy and the Human Rights Policy. Additionally, our internal procedures outline how we consult and communicate with stakeholders, ensure free prior and informed consent (FPIC) and address grievances. The standards we set for both our operations and suppliers are aligned with the International Labour Organization Indigenous and Tribal Peoples Convention No. 169. All our business activities and supply chain recognise legal and customary land tenure rights.

For more information, refer to [www.glenealyplantations.com.my/care.php](http://www.glenealyplantations.com.my/care.php)



## SOCIAL IMPACT ASSESSMENTS (SIA)

As part of our commitment to the MSPO standard, we conduct SIA across our operational complexes. These assessments help us to understand how our operations affect the local communities and identify ways to reduce harm while increasing positive outcomes.

During the reporting period, we conducted SIA at Jelalong, Lana, Belaga and Timora complexes. The process involved both internal and external stakeholders, including local communities and estate teams. The SIA is guided by the MSPO Principle 4, which calls for participation from affected groups and where relevant, focuses on areas such as food security and child rights.

Each SIA included dialogue sessions, site visits and information sharing on current operations. The feedback received was used to improve our management plans and will be reviewed before replanting or every five years. This helps us to stay accountable, responsive and aligned with the expectations of those who live and work alongside our estates.



Social impact assessments conducted at Timora complexes

## CREATING POSITIVE IMPACT

We support local communities by going beyond merely handing out cash. We believe in creating lasting impact by creating job opportunities, offering essential community services and building facilities that make a real difference in the local community's daily lives. From maintaining roads and bridges to keeping schools running and offering basic health care, our focus is on what the community needs to thrive.

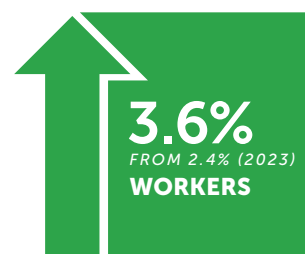
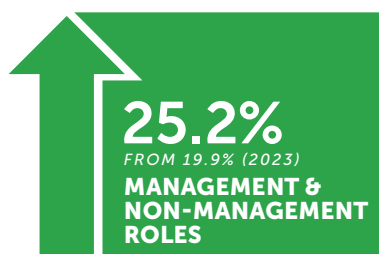
### IN FY2024

**>RM170,000**  
INVESTED INTO  
LOCAL COMMUNITIES  
EXCLUDING VEHICLE RUNNING EXPENSES  
FOR ROADS & BRIDGES REPAIR

**BENEFITTED >30 ORGANISATIONS,  
SCHOOLS, COMMUNITIES &  
INDIVIDUALS**

**≥6.1% OF TOTAL  
EMPLOYEES**  
FROM MALAYSIAN ESTATES & MILLS  
WERE FROM THE LOCAL COMMUNITIES  
WHERE WE OPERATE

### IN 2024, LOCAL HIRING AT ESTATES IMPROVED



In mills, although there was a slight decrease in local hiring, the proportion remained stable, with management and non-management roles at 36.8% and worker roles at 16.2%.

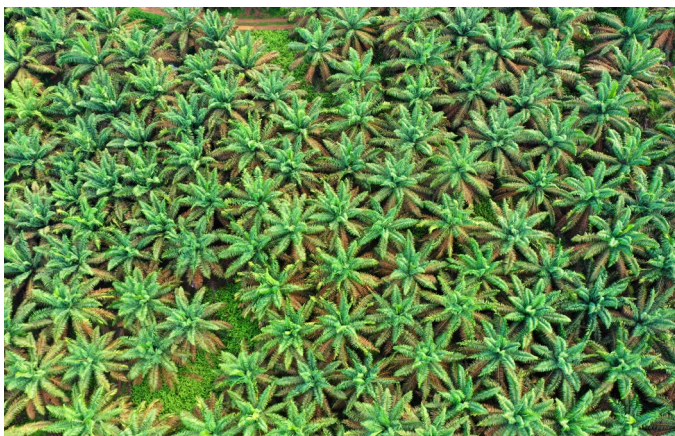
We continue to create employment opportunities for local talent, including in management roles, enabling them to access higher earning potential.



<b>Employees Hired from the Local Communities (%)</b>	<b>2022 (FY2021/2022)</b>	<b>2023 (FY2022/2023)</b>	<b>2024 (FY2023/2024)</b>
Estate (Management + Non-Management)	25.4	19.9	25.2
Estate (Workers)	10.4	2.4	3.6
Mills (Management + Non-Management)	37.8	41.2	36.8
Mills (Workers)	30.8	18.5	16.2

## COMMUNITY INITIATIVES IN FY2023/24:

On 26 June 2024, we collaborated with the Jelalong Complex team and its nearby communities at Rumah Jeranding, Jelalong, Bintulu to support oil palm smallholders through knowledge sharing and capacity building. The programme focused on improving productivity, sustainability and profitability through practical guidance on agricultural practices. Smallholders joined estate team members and community leaders in the various sessions on increasing yields, effective weeding, fertiliser application and safety. These sessions were led by experienced estate managers and the sustainability team. The event brought together 60 participants.



In 2024, we also continued conducting our ongoing food security programme to help plantation workers and their families access fresh, safe and affordable food. This is especially important in remote areas, where supplies can be limited or costly. The programme encourages small-scale farming on company land or at home, using simple methods suited to local conditions.



Workers grow a mix of vegetables and fruits such as pumpkin, maize, long bean, chillies and durian. Some also raise ducks, goats or fish as sources of protein. In certain sites, hydroponic methods are used to grow leafy greens. The produce is often shared within the community, helping reduce household costs and improve nutrition. This initiative is part of GPSB's wider efforts to support wellbeing beyond the workplace.

For more information on the food security programme, refer to [www.glenealyplantations.com.my/prosperity.php](http://www.glenealyplantations.com.my/prosperity.php)

## GOING FORWARD

As we step into 2025, we will continue strengthening our efforts to support and protect local communities. We plan to carry out CSR initiatives and work with external partners including government agencies to deliver social support, education and environmental awareness to the local communities around us. We will also share knowledge on good agricultural practices through training sessions and engage regularly with stakeholders to address their concerns and meet their needs, as well as enhancing our complaints and grievance mechanisms. At the same time, we are exploring economic empowerment opportunities that can be introduced within the local communities.

# APPENDICES

## PERFORMANCE DATA

### GOVERNANCE

<b>Communication of anti-corruption policy &amp; procedures (%)</b>	<b>2024</b> (FY2023/2024)
Senior Management	100
Employees	100
Business partners, including suppliers and vendors	100

<b>Anti-corruption training (%)</b>	<b>2024</b> (FY2023/2024)
Senior Management	100
Employees	100

<b>Incidents, complaints and non-compliance</b>	<b>2024</b> (FY2023/2024)
Incidents of bribery and corruption	0
Incidents where contracts with business partners were terminated or not renewed due to violations related to corruption	0
Public legal cases regarding corruption brought against GPSB or GPSB's employees	0

### ENVIRONMENT

	<b>2023</b> (FY2022/2023)	<b>2024</b> (FY2023/2024)
<b>Water</b>		
Total Consumption (ℓ)	1,061,861,201	1,091,443,127
<b>Waste</b>		
<b>Scheduled Waste (Disposal by Licensed Contractor)</b>		
Used Oil (kg)	39,132	30,332
Used Battery (kg)	5,147	3,786
Contaminated Rags & Filter (kg)	7,048	4,005
Contaminated Containers (kg)	1,757	2,029
Contaminated Used Spill Kit (kg)	701	581
Clinical Waste (kg)	216	178
<b>Recyclable Waste (Sold/Disposed to Recycle Centre)</b>		
Used Tyres (pcs)	769	574
Recycle Plastic Bottles & Containers (kg)	4,390	11,901
Recycle Cans (kg)	363	1,291
<b>Palm Oil Mill By-Product Management</b>		
Empty Fruit Bunch (EFB) (Mt) - <i>Incinerator Fuel</i>		64,125
Empty Fruit Bunch (EFB) (Mt) - <i>Boiler Fuel</i>		24,305
Empty Fruit Bunch (EFB) (Mt) - <i>Mulching</i>		45,367
Palm Kernel Shell (PKS) (Mt) - <i>Sell</i>		1,284
Palm Kernel Shell (PKS) (Mt) - <i>Boiler fuel</i>		24,499
Oil Palm Fruit Mesocarp Fiber (Mt) - <i>Boiler Fuel</i>		87,462

	2023 (FY2022/2023)	2024 (FY2023/2024)
<b>Waste</b>		
<b>Palm Oil Mill By-Product Management</b>		
Palm Oil Mill Sludge (Mt)		15
Incinerator Bunch Ash (Mt) - <i>Sell &amp; Own Consumption</i>		1,466
Plam Oil Mill Effluent (POME) (m³) - <i>Treated Volume</i>		463,913
Decanter Cake (Mt) - <i>Disposal at Estate</i>		15,375
Final Discharge of Wastewater (m³)		412,370
<b>Domestic waste</b>		
To landfill (Mt)		Approximately 900
<b>Diesel</b>		
Total Consumption (ℓ)	5,728,962.3	6,029,403.26
<b>Electricity</b>		
Total Consumption (kWH)	21,390,036	20,928,665

## SOCIAL

<b>Governance Bodies and Employee Diversity Data</b>	2024 (FY2023/2024)
<b>Senior Management</b>	
Female	1
Male	18
<b>Management</b>	
Female	4
Male	112
<b>Non-Management</b>	
Female	114
Male	144
<b>Workers</b>	
Female	1,351
Male	3,105
<b>GROUP TOTAL</b>	4,849

<b>Employees Hired from the Local Communities (%)</b>	2022 (FY2021/2022)	2023 FY2022/2023)	2024 (FY2023/2024)
Estate (Management + Non-Management)	25.4	19.9	25.2
Estate (Workers)	10.4	2.4	3.6
Mills (Management + Non-Management)	37.8	41.2	36.8
Mills (Workers)	30.8	18.5	16.2

	2023 FY2022/2023)	2024 (FY2023/2024)
Total employee hires	1,862	1,427
Total employees turnover (including foreign workers)	1,660	1,329

Occupational Health and Safety	2022 (FY2021/2022)		2023 (FY2022/2023)		2024 (FY2023/2024)	
	No.	Rate	No.	Rate	No.	Rate
All employees						
Fatalities as a result of work-related injury	0	0	1	0.78	0	0
Recordable work-related injuries	18	1.500	20	1.562	40	3.584

	2022 (FY2021/2022)	2023 (FY2022/2023)	2024 (FY2023/2024)
The number of hours worked	12,003,264	12,806,976	12,275,328

## GRI CONTENT INDEX

### STATEMENT OF USE

Glenealy Plantations Sdn Bhd (GPSB) has reported the information cited in this GRI content index for the period of 1 January to 31 December 2024 with reference to the GRI Standards.

### GRI 1 USED

#### GRI 1: Foundation 2021

Disclosure	Description	Page	Remarks/ Omissions
<b>GRI 2: General Disclosures 2021</b>			
2-1	Organisational details	1-2	
2-2	Entities included in the organisation's sustainability reporting	2	
2-3	Reporting period, frequency and contact point	1	
2-4	Restatements of information	-	
2-5	External assurance	-	This Report has not been externally assured.
<b>Activities and workers</b>			
2-6	Activities, value chain and other business relationships	2-4	
2-7	Employees	32	
2-8	Workers who are not employees	-	No data has been collected.
<b>Governance</b>			
2-9	Governance structure and composition	17	
2-10	Nomination and selection of the highest governance body	-	Not disclosed due to confidentiality constraints.
2-11	Chair of the highest governance body	17	<b>Han Boon Kwang</b> <i>Plantations Director</i>
2-12	Role of the highest governance body in overseeing the management of impacts	17	
2-13	Delegation of responsibility for managing impacts	17	
2-14	Role of the highest governance in sustainability reporting	17	
2-15	Conflicts of interest	19	
2-16	Communication of critical concerns	30	
2-17	Collective knowledge of the highest governance body	-	Not disclosed due to confidentiality constraints.
2-18	Evaluation of the performance of the highest governance body	-	Not disclosed due to confidentiality constraints.
2-19	Remuneration policies	-	Not disclosed due to confidentiality constraints.
2-20	Process to determine remuneration	-	Not disclosed due to confidentiality constraints.
2-21	Annual total compensation ratio	-	Not disclosed due to confidentiality constraints.
<b>Strategy, policies and practices</b>			
2-22	Statement on sustainable development strategy	5-8	
2-23	Policy commitments	18-19	
2-24	Embedding policy commitments	19, 22, 33, 35	
2-25	Processes to remediate negative impacts	19, 36	
2-26	Mechanisms for seeking advice and raising concerns	19, 30-31	
2-27	Compliance with laws and regulations	20-23, 28, 30-31, 36	
2-28	Membership associations	4	
<b>Stakeholder engagement</b>			
2-29	Approach to stakeholder engagement	14-15	
2-30	Collective bargaining agreements	31	
<b>GRI 3: Material Topics 2021</b>			
3-1	Process to determine material topics	15	
3-2	List of material topics	15-16	

Disclosure	Description	Page	Remarks/ Omissions
<b>Standard Disclosures</b>			
<b>Material Matter: Leadership Transparency and Accountability</b>			
<b>GRI 3: Material Topics 2021</b>			
3-3	Management approach	17-19	
<b>Material Matter: Commitment To Anti-Corruption and Anti-Bribery Practices</b>			
<b>GRI 3: Material Topics 2021</b>			
3-3	Management approach	19	
<b>GRI 205: Anti-Corruption 2016</b>			
205-2	Communication and training about anti-corruption policies and procedures	20	
205-3	Confirmed incidents of corruption and action taken	20	
<b>Material Matter: Accountability, Openness, Transparency and Traceability</b>			
<b>GRI 3: Material Topics 2021</b>			
3-3	Management approach	20	
<b>Material Matter: Environmental Compliance</b>			
<b>GRI 3: Material Topics 2021</b>			
3-3	Management approach	22	
<b>GRI 302: Energy 2016</b>			
302-1	Energy consumption within the organization	29	
<b>GRI 303: Water and Effluents 2018</b>			
303-1	Interactions with water as a shared resource	28	
303-2	Management of water discharge-related impacts	28	
303-5	Water consumption	28	
<b>GRI 304: Biodiversity 2016</b>			
304-2	Significant impacts of activities, products and services on biodiversity	22-23	
304-3	Habitats protected or restored	23	
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	24-27	
<b>GRI 306: Waste 2020</b>			
306-1	Waste generation and significant waste-related impacts	28	
306-2	Management of significant waste-related impacts	28-29	
306-3	Waste generated	28-29	
<b>Material Matter: Protection of Human Rights</b>			
<b>GRI 3: Material Topics 2021</b>			
3-3	Management approach	30	
<b>GRI 401: Employment 2016</b>			
401-1	New employee hires and employee turnover	32	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	32	
<b>GRI 404: Training and Education 2016</b>			
404-1	Average hours of training per year per employee	32	
404-2	Programmes for upgrading employee skills and transition assistance programmes	32-33	
404-3	Percentage of employees receiving regular performance and career development reviews	33	
<b>GRI 405: Diversity and Equal Opportunity 2016</b>			
405-1	Diversity of governance bodies and employees	32	
<b>GRI 406: Non-Discrimination 2016</b>			
406-1	Incidents of discrimination and corrective actions taken	30	
<b>GRI 407: Freedom of Association and Collective Bargaining 2016</b>			
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	31	
<b>GRI 408: Child Labor 2016</b>			
408-1	Operations and suppliers at significant risk for incidents of child labor	31	
<b>GRI 409: Forced or Compulsory Labor 2016</b>			
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	31	
<b>GRI 411: Rights of Indigenous Peoples 2016</b>			
411-1	Incidents of violations involving rights of indigenous peoples	30	

Disclosure	Description	Page	Remarks/ Omissions
<b>Material Matter: Employee Occupational Safety and Well-Being</b>			
<b>GRI 3: Material Topics 2021</b>			
3-3	Management approach	33-34	
<b>GRI 403: Occupational Health and Safety 2018</b>			
403-1	Occupational health and safety management safety	33-34	
403-2	Hazard identification, risk assessment and incident investigation	34	
403-3	Occupational health services	34	
403-4	Worker participation, consultation and communication on occupational health and safety	35	
403-5	Worker training on occupational health and safety	35	
403-6	Promotion of worker health	34	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	34	
403-9	Work-related injuries	36	
403-10	Work-related ill health	36	
<b>Material Matter: Protection of Local Communities</b>			
<b>GRI 3: Material Topics 2021</b>			
3-3	Management approach	36	
<b>GRI 203: Indirect Economic Impacts 2016</b>			
203-1	Infrastructure investments and services supported	37-38	
203-2	Significant indirect economic impacts	37	
<b>GRI 413: Local Communities 2016</b>			
413-1	Operations with local community engagement, impact assessments and development programs	37-38	



#### **Contact Us**

For questions or to deliver feedback  
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