

Findings on the Progress of FGV's Action Plan 2020

Published: March 31, 2021

Executive Summary

[FGV Holdings Berhad](#) (FGV) [affiliated](#) with the [Fair Labor Association](#) (FLA) in October 2019. Through this affiliation FGV's top management committed to uphold FLA standards, address labor issues, and drive long-term improvements to working conditions in its owned operations and its upstream supply chain.

On March 31, 2020, FGV released [Action Plan 2020](#), a document that aligns FGV's commitment and practices with FLA standards, namely the [FLA Workplace Code of Conduct for the Agriculture Sector](#) (FLA Workplace CoC) and [FLA Principles of Fair Labor and Responsible Sourcing for Companies with Agricultural Supply Chains](#) (FLA Principles). The Action Plan 2020 details 46 action items that cut across the 10 FLA Principles.

On September 30, 2020, FLA published the first interim [Progress Findings Report](#), assessing FGV implementation of its management system's level action plan for the time period of January to September 2020. In line with FLA expectations, FGV focused this initial implementation period on confirming top management commitment, alignment of policies and standards, internal staff training, and strengthening engagement with external stakeholders. These actions are foundational to long-term sustainable changes in workplace conditions.

This validation report provides an updated assessment of implementation of the Action Plan 2020 for the time period of September 30, 2020, to March 15, 2021. It details activities undertaken by FGV and assesses FGV's progress in improving its internal management systems.

In addition to this management systems Action Plan 2020 validation, in the second quarter of 2021 FLA will conduct an Independent External Assessment (IEA)¹ based on [FLA's Workplace CoC](#) for the Agriculture Sector in FGV operations. The IEA findings and FGV's Corrective Action Plan (CAP) will be published by FLA in late 2021.

FLA Progress Update from September 30, 2020 is available [here](#).

FLA Standards for the Agriculture Sector

When a company joins the FLA, its senior leadership makes a commitment to implement the FLA Principles and uphold the FLA Workplace CoC at the farm level. The FLA regularly evaluates the labor compliance programs of the affiliated companies against its Principles and publicly communicates about the performance.

The FLA Principles are based on internationally recognized guidelines for agriculture supply chains and seek to uphold and protect workers' rights. The FLA Principles provide foundational and operational guidance for companies to apply in their labor standards management systems which allows companies to develop stronger labor compliance programs in their supply chains. As a result, a company's ability to identify noncompliance, remediate in a timely manner, and introduce mitigation measures improve over time. In this way, companies demonstrate their commitment to respect labor rights and account for the impact they have on workers and their communities.

The FLA Workplace CoC is based on International Labor Organization (ILO) core conventions and internationally recognized good labor practices. All companies affiliated with the FLA are expected to comply with all relevant and applicable laws and regulations of the country in which workers are employed, and to implement these labor standards at both owned plantations and upstream farms, including small-holder farmers. When differences or conflicts in standards arise, affiliated companies are expected to apply the highest standard and the one most favorable to workers. The FLA's Workplace CoC consists of elements including Employment Relationships, Forced Labor, Child Labor, Harassment and Abuse, Non-Discrimination, Freedom of Association and Collective Bargaining, Compensation, Hours of Work, and Health, Safety and Environment.

¹ FLA conducts five types of assessments in the agriculture sector depending on the maturity of a company's social compliance program in a given country and commodity. These include, 1) Baseline Mapping; 2) Independent External Monitoring (IEM); 3) Independent External Verification (IEV); 4) Focused Assessment; and 5) Social Impact Assessment (SIA). In the case of FGV, FLA will conduct an IEM.

Methodology for FLA Validation and the Progress Report

Objective and Method

The objective of this review is to validate the progress reported by FGV on its Action Plan 2020. The company's report covered activities taken through March 2021. The validation was led by FLA staff and two FLA-appointed independent assessors², supported by a research facilitator and a translator (fluent in Bangla and Hindi). Given the COVID-19 related movement control order, the validation activities were conducted virtually.

The validation consisted of documentation review, management interviews, external stakeholder interviews and a worker survey. Annex 2 presents the detailed activities undertaken during the validation exercise and the stakeholders involved. Annex 3 presents a list of the documents reviewed during the validation exercise.

During the worker survey, FLA surveyed 113 workers from two FGV owned palm estates – one in Peninsular Malaysia and second in Sabah. Among the surveyed workers, migrant workers from Indonesia represented 41.6 percent, with workers from Bangladesh (25.7 percent), Philippines (18.6 percent), and India (14.2 percent) also represented. Eighty-five percent were male and 15 percent female migrant workers. The workers' survey focused on validating the Action Plan 2020, and FGV activities to strengthen its internal management system.

Progress Status

This report has three main components: (i) FGV Progress Update on the Action Plan; (ii) FLA Findings of FGV Progress Updated; and (iii) Progress Status. Table 2 presents the overall progress summary and Table 3 presents the detailed findings, including the FGV Progress Update and Action Plan 2020 Status.

For consistency in progress benchmarking, this report maintains the previous progress status categories, as follows:

- **“Planned”** refers to an action item that does not show any significant effort
- **“In Progress”** refers to an action item that indicates an initial action and/or commitment from FGV but yet to accomplish the expected output and/or outcome
- **“Implemented”** refers to an action item that achieves the intended output and/or outcome

FGV has “implemented” 21 action items; 24 action items are “in progress”, and one action item remains “planned.” Table 1 illustrates the progress made from the findings of September 30, 2020 to progress as of March 15, 2021.

Table 1: Summary of Progress between the first Progress Report (September 2020) and Current Progress Report (March 2021)

Progress Status	September 30, 2020 Progress Report [# of Action Items]	March 31, 2021 Progress Report [# of Action Items]
Planned	10	1
In Progress	29	24
Implemented	7	21
Total Action Items	46	46

During the worker survey, several workplace-level non-compliances came to light. The FLA will include this information as part of reporting on the planned IEA, which will include workplace compliance benchmarks and assess working conditions at the estate level. FLA will publish this report later in 2021.

² <https://www.fairlabor.org/transparency/fla-accredited-monitoring-organizations>

Table 2: Progress Summary (Previous and Current Progress)

Action Plan Published: March 31, 2020	Specific Activity	Progress Status (September 30, 2020)	Progress Status (March 31, 2021)
Principle 1: Top Management Commitment and Work Plan Labor Standards			
1.1 Initial assessment of FGV's Supplier Code of Conduct (SCOC)	1.1.1	Implemented	Implemented
1.2 Alignment of FGV's SCOC and other related labor policies and procedures	1.2.1	In Progress	In Progress
	1.2.2	In Progress	In Progress
1.3 Review & amendment of employment policy, contract, ensuring consistency to FLA CoC	1.3.1	In Progress	In Progress
1.4 Socialize Group Chief Executive Officer (GCEO's) sustainability commitment	1.4.1	Implemented	Implemented
	1.4.2	Implemented	Implemented
1.5 Strengthen representation of Group Sustainability Department (GSD) at the highest governance level to ensure consistent labor rights agenda at the top level	1.5.1	Implemented	Implemented
1.6 Updating policies and procedures on the prohibition and prevention of forced labor	1.6.1	In Progress	In Progress
1.7 Updating policies and procedures on the prohibition and prevention of child labor	1.7.1	In Progress	In Progress
1.8 Updating policies and procedures on right to freedom of association	1.8.1	In Progress	In Progress
1.9 Updating policies and procedures on promotion of gender equality and women empowerment	1.9.1	In Progress	In Progress
Principle 2: Company Staff Training			
2.1 Improve FGV's organizational chart to reflect revised responsibilities on labor compliance	2.1.1	In Progress	Implemented
2.2 Improve job descriptions to reflect revised responsibilities on labor compliance	2.2.1	Implemented	Implemented
	2.2.2	In Progress	Implemented
2.3 Strengthen the appointment process of responsible staff	2.3.1	In Progress	Implemented
2.4 Implement staff training on labor standards and social performance	2.4.1	In Progress	Implemented
Principle 3: Supplier Engagement and Training			
3.1 Strengthen the practices of recruitment agencies responsible for hiring of workers and their compliance with labor standards	3.1.1	In Progress	Implemented
	3.1.2	Planned	Implemented
	3.1.3	Planned	Implemented
3.2 Organize worker trainings	3.2.1	In Progress	In Progress
	3.2.2	In Progress	Implemented
Principle 4: Functioning Grievance Mechanism			
4.1 Training and information sharing on grievance mechanisms and grievance redressal	4.1.1	Planned	In Progress
4.2 Strengthening of the grievance mechanism	4.2.1	Planned	In Progress
Principle 5: Monitoring			
5.1 Develop and strengthen a comprehensive labor standards compliance system	5.1.1	Planned	In Progress
5.2 Improve Human Resources (HR) management of staff and workers	5.2.1	Planned	In Progress
5.3 Strengthening the working and living conditions of workers	5.3.1	In Progress	Implemented
Principle 6: Collection and Management of Compliance Information			
6.1 Develop an information management system accessible to the FLA	6.1.1	In Progress	In Progress
Principle 7: Timely and Preventative Remediation			
7.1 Regularization and monitoring of undocumented migrant workers	7.1.1	In Progress	In Progress
	7.1.2	Planned	Planned
	7.1.3	Planned	In Progress
	7.1.4	In Progress	In Progress
7.2 Strengthen FGV's commitment and practices on fair recruitment practices	7.2.1	In Progress	In Progress
	7.2.2	In Progress	In Progress
	7.2.3	Planned	In Progress
7.3 Strengthen the post-arrival orientation program for migrant workers	7.3.1	In Progress	In Progress
	7.3.2	In Progress	In Progress
7.4 Enhance pre-departure communication pack for migrant workers	7.4.1	In Progress	In Progress
	7.4.2	Planned	In Progress

Principle 8: Responsible Procurement Practices			
8.1 Strengthen procurement policy and practices to mitigate negative effects on workers	8.1.1	In Progress	In Progress
Principle 9: Consultation with Government, Local Authorities & Civil Society			
9.1 Consulting stakeholders for development and progress on the action plan	9.1.1	Implemented	Implemented
9.2 Undertake stakeholder overview/mapping	9.2.1	Implemented	Implemented
Principle 10: Verification Requirements			
10.1 Creating an internal procedure to manage affiliation with the FLA	10.1.1	In Progress	Implemented
10.2 FGV's participation in FLA's independent external assessments	10.2.1	In Progress	Implemented
	10.2.2	In Progress	Implemented
10.3 Regular reporting to the FLA	10.3.1	In Progress	Implemented
10.4 Provision of information and other support for assessment and verification	10.4.1	In Progress	Implemented

Table 3: Detailed FGV Progress Update and FLA Findings for March 31, 2021

FLA Progress Update from September 30, 2020 is available [here](#).

FGV Action (Implementation Plan)	Time line	FLA Progress Status	FGV Progress Update on Action Plan 2020 March 31, 2021	FLA Findings and Progress Update March 31, 2021
			<p>FGV’s Response to COVID-19 FGV implemented a comprehensive COVID-19 response since the beginning of the pandemic. FGV established a COVID-19 Task Force that supervised the development of COVID-19 specific policies, guidelines, a Pandemic Response Plan, Key Interruptions Indicators (KII) and Standard Operating Procedures. As part of the plan, workers’ health status was closely tracked for infections through screening tests for all workers including migrant workers. As of March 2021, FGV screened all its 26,988 plantation workers for COVID-19. During the pandemic, despite limited number of international flights and worker repatriation being a challenge, between March-December 2020, FGV facilitated repatriation of 1,084 migrant workers (661 from Indonesia, 295 from India, 126 from Bangladesh, and 2 from Nepal) who requested to return to their home countries.</p>	<p>FLA validation focused on verifying the activities listed in the Action Plan 2020, below. FLA will verify the implementation of the COVID-19 activities during the upcoming independent external assessment.</p>
<p>Principle 1: Top Management Commitment and Workplace Labor Standards - Company affiliate establishes and commits to clear standards</p>				
<p>1.1 Initial assessment of FGV’s Suppliers Code of Conduct (SCOC)</p>				
<p>1.1.1 FGV SCOC is not aligned with FLA Workplace Code of Conduct for the Agriculture Sector</p>	<p>2021 (Q2)</p>	<p>Implemented</p>	<p>1.1.1 The SCOC was sent to FLA for a full gap analysis between March and April 2020. FLA reviewed the SCOC and provided its gap analysis findings for FGV’s further action in April/May 2020.</p>	<p>1.1.1 FLA’s gap assessment on the FGV Supplier Code of Conduct (SCOC) was submitted to FGV in April/May 2020. The current FGV SCOC is yet to fully align with the FLA’s Workplace CoC, particularly the code element “Hours of</p>

(FLA CoC).				<p>Work”. FLA raised this issue with the C-Suite in an online meeting in March 2021.</p> <p>Sources</p> <ul style="list-style-type: none"> - Document review - Engagement FGV C-Suite
1.2 Alignment of FGV’s SCOC and other related labor policies and procedures				
1.2.1 FGV will undertake the necessary amendments to align its SCOC and other labor policies and procedures with the FLA CoC.	2020 (Q4)	In Progress	<p>1.2.1(i) FGV’s SCOC was adopted in April 2019. Recognizing the need to ensure that our suppliers and contractors also commit and adhere to the same values and principles that we embrace, FGV has adopted a Supplier Code of Conduct (SCOC), outlining the principles and standards relating to sustainability; business ethics and integrity; safety, health and environment; and labour, among other things. With the SCOC, any supplier or contractor wishing to enter into a business partnership with FGV is required to commit to and apply the principles and standards stipulated by the SCOC.</p> <p>In May 2020, the SCOC was revised to strengthen clauses relating to environmental protection and labour standards.</p> <p>The SCOC is currently being further reviewed to align it with the latest version of FGV’s Group Sustainability Policy (GSP 4.0), which was adopted in November 2020.</p>	<p>1.2.1(i). FLA reviewed the revision of FGV SCOC, and confirmed that it has not been adopted by FGV as of February 28, 2021. The current (revised) FGV SCOC is not aligned with the FLA Workplace CoC on Hours of Work. Specifically, the FGV SCOC does not stipulate the sum of regular and overtime hours in a week (i.e., not exceeding 60 hours in a week).</p> <p>1.2.1(i) Interview with FGV Core Team (Palm Industry & Plantation Operation) confirmed the difficulties limiting the hours of work to 60 hours per week especially at the mill level. Besides, the existing Malaysian laws allow for a weekly sum of regular and overtime work up to 72 hours, provided that the monthly overtime work hours do not exceed 104 hours. Based on external information, the Government of Malaysia is engaging various stakeholders, including civil society organizations to amend the Employment Act, with the view to reduce the hours of work to align with the international standards. Any further amendment to the act will need to be tabled and debated by the regulators in Parliament.</p> <p>1.2.1(ii) The FGV GSP has been revised and adopted by the FGV’s Board of Directors in November 2020. However, FLA noted that the GSP is yet to fully aligned with the FLA Workplace CoC, specifically on Hours of Work (i.e., not exceeding 60 hours of work in a week).</p>

			1.2.1(ii) FGV has revised its Group Sustainability Policy (GSP), with a view to aligning it with the FLA WCOC. The revised version of the GSP was adopted by FGV's Board of Directors on 17 November 2020.	Sources - Document review - Interview FGV Core Team
1.2.2 FGV acknowledges that there are challenging areas (i.e., working hours). FGV will organize internal consultations, meetings and training to get support and approval.	2020 (Q4)	In Progress	1.2.2 FGV is committed to aligning its practices with international labour standards and with the FLA Workplace Code of Conduct (CoC). Nonetheless, there are challenges for FGV to achieve full alignment on the aspect of hours of work (HOW). This is mainly due to existing industry norms on hours of work based on relevant Malaysian laws, which are inconsistent with the WCOC. The Malaysian laws allows for a weekly sum of regular and overtime work of 72 hours, provided that the monthly overtime work hours do not exceed 104 hours. This is in contrast to the standard under the FLA WCOC, which allows for a maximum of 60 hours for the weekly sum of regular and overtime work. FGV believes that the implementation of international standards in this regard would not only be a challenge for FGV but also for other actors within the industry, especially those operating in Malaysia. To demonstrate FGV's commitment to move towards alignment on this subject, FGV has conducted an internal study on hours of work, with the following main objectives: <ul style="list-style-type: none"> i. To understand the existing system of record keeping, maintaining and reporting of hours of work in selected FGV's operations ii. To determine the patterns of hours of work by selected variables 	1.2.2. FLA reviewed the preliminary findings from the hours of work (HOW) study conducted by FGV and found that workers in mills work more than 60 hours per week. These include workers employed as general workers (e.g., working in mechanical, electrical and processes) and operators in FGV mills. FGV Core Team informed that there are no migrant workers hired in FGV mills across Malaysia. 1.2.2. FLA's review of the preliminary findings from the HOW study found that the existing FGV overtime policy provides a transparent calculation of overtime work. However, the overtime policy does not include a specific clause on "consensual" overtime work – a requirement stipulated under the FGV GSP. At the estates, the FLA Workers' Survey found that some workers claimed that they are not required to sign an overtime agreement and/or form prior to working overtime. 1.2.2. FLA's review of the preliminary HOW study findings noted that it does not indicate the potential root causes that lead workers to work overtime exceeding the FLA Workplace CoC. The study also does not contain any recommendations in addressing the current hours of work practices both in mills and estates. 1.2.2 FLA confirmed that upon completion of the HOW study, FGV conducted an internal consultation on March 15, 2021, to identify the root causes and determine the next steps in aligning its commitment on hours of work with the FLA CoA. During the interview session with the Core Team (Group Sustainability Division), FGV informed that it will

			<p>iii. To identify factors contributing to the existing working hour' practices</p> <p>iv. To develop appropriate recommendations based on the findings of the study, which will serve as the basis for internal discussions on the feasibility of FGV adopting FLA's standards on working hours.</p> <p>Based on the preliminary study findings FGV plans to undertake internal consultations to define next steps.</p>	<p>continue consultations internally with various operation units in the coming months.</p> <p>Sources</p> <ul style="list-style-type: none"> - Document review - Interview FGV Core Team - FLA Workers' Survey
<p>1.3 Review and amend employment policy and contract, ensuring consistency to FLA CoC</p>				
<p>1.3.1 FGV will reflect the UNGPs and the ILO Guidelines on Fair Recruitment in its recruitment policy and practices.</p>	<p>2020 (Q4)</p>	<p>In Progress</p>	<p>1.3.1(i) FGV's contract with recruitment agencies has been reviewed to, <i>inter alia</i>, strengthen requirements for the recruitment agencies to respect human rights and to comply with the laws of the countries of origin and destination, and with fundamental principles and rights at work as well as international labour standards.</p> <p>1.3.1(ii) Taking into account the recommendations arising from the IOM-Earthworm Foundation's report on the labour supply mapping project and from the FLA-FGV Workshop on Responsible Recruitment, FGV is reviewing its Guidelines and Procedures for the Responsible Recruitment of Foreign Workers (GPRRFW).</p>	<p>1.3.1(i) FLA reviewed the revised contract agreement with recruitment agencies (March 1, 2020). In light of the COVID-19, FGV did not sign any new contracts with recruitment agencies throughout the reporting period. It was confirmed by FGV Core Team (Group Procurement and Field Workforce Division). FLA confirmed this in the meeting with two FGV recruitment agencies. No new formal recruitment of migrant workers has taken place since March 2020. The Workers' Survey suggested that informal recruitment is taking place at the estate level, FLA needs to investigate this further during its IEA.</p> <p>1.3.1(i) FLA received the revised "communication pack" and confirmed that it includes elements such as duration of employment contract, type of work and location, compensation, benefits, rules and regulation and workers' right.</p> <p>1.3.1(ii) FLA received the draft amendment of the FGV Guidelines and Procedures for the Responsible Recruitment of Foreign Workers (GPRRFW). FLA confirmed that the</p>

				<p>draft guidelines adequately reflect the UNGPs and the ILO Guidelines on Fair Recruitment, pending adoption by the company's management.</p> <p>Sources</p> <ul style="list-style-type: none"> - Document review - Interview FGV Core Team - Interview two FGV Recruitment Agencies
1.4 Socialize Group Chief Executive Officer (GCEO's) sustainability commitment				
<p>1.4.1 FGV will issue a commitment letter to uphold the FLA CoC in its policies and procedures. This letter will be circulated to all FGV's owned operations and employees and will also be posted on FGV's website.</p>	<p>2020 (Q2)</p>	<p>Implemented</p>	<p>1.4.1 A commitment to uphold the FLA CoC in FGV's policies and procedures has been formally expressed at the highest level of FGV's management. FGV's Group Chief Executive Officer (CEO) has made a public commitment to the FLA CoC and to uphold international labor standards. The statement of commitment has been published on FGV's website. It has also been translated to Malay and circulated to all operations and employees of FGV on July 10.</p>	<p>1.4.1 FLA confirmed the top-management commitment to respect human rights and uphold international labor standards. A review of FGV's sustainability website confirmed that the commitment has been made by the GCEO dated September 26, 2020.</p> <p>1.4.1. FGV Core Team (Group Strategic Communication Department and Risk Management Division) confirmed that internal communication was made to socialize the top-management commitment to respect human rights and uphold labor standards in its owned operations. Socialization was done through multiple channels, including its internal information sharing platforms (FGV's <i>Hub</i>), email communication, and social media platforms. In sharing of information with the workers, FGV stressed that such information is shared in the language the workers understand.</p> <p>Sources</p> <ul style="list-style-type: none"> - FGV's Sustainability Website - Engagement FGV C-Suite - Interview FGV Core Team

<p>1.4.2 GSD will work closely with FGV's Communication Department to strengthen internal communication ensuring all employees are adequately informed and updated frequently of the improved policies and procedures.</p>	<p>2020 (Q2)</p>	<p>Implemented</p>	<p>1.4.2 GSD and Group Strategic Communications Division (GSCD) works together on internal and external communication on matters pertaining to sustainability. FGV has also established a dedicated section sustainability within the FGV Hub. FGV Hub serves as a one-stop-center for all of FGV's employees to access company policies, codes and procedures. The sustainability section of the FGV Hub contains information on FGV's sustainability initiatives as well as policies and procedures relating to sustainability.</p>	<p>1.4.2 Interview with FGV Core Team (Group Sustainability Division and Group Strategic Communications Division) confirmed that the two Divisions are collaborating to strengthen the internal and external communication on matters related to sustainability, particularly on labor standards.</p> <p>Sources</p> <ul style="list-style-type: none"> - Document review - Interview FGV Core Team
<p>1.5 Strengthen representation of Group Sustainability Department (GSD) at the highest governance</p>				

<p>1.5.1 FGV has placed at least one sustainability's (GSD) staff in the Governance and Risk Management Committee. Sustainability and social compliance will be included as a standing agenda item as part of the regular meetings of the Committee.</p>	<p>2020 (Q4)</p>	<p>Implemented</p>	<p>1.5.1 The Head of Group Sustainability Division (GSD) continues to become a permanent member of the Group Management Committee (GMC). The GMC represents the highest level of management within FGV. Sustainability matters are a permanent agenda item of the monthly GMC meetings, which are chaired by the Group CEO. In addition, sustainability and social compliance are instituted as a permanent agenda item of the Board Governance and Risk Management Committee (BGRMC) meetings, requiring the Head of GSD to attend all of the BGRMC meetings. The Sustainability Synergy Committee (SSC), which comprises the heads or representatives of the various sectors and divisions within the FGV Group, continues to play its role in addressing issues matters pertaining to sustainability. Meetings of the SSC are held every quarter.</p>	<p>1.5.1 FLA confirmed that the Head of Group Sustainability Division is a permanent member of the Group Management Committee (GMC). Interviews with the Core Team confirmed that the Group Sustainability Division is working closely with Board Governance and Risk Management Committee (BGRMC). Review of internal documents confirmed that sustainability and social compliance are among the regular agenda items (for discussion) at the BGRMC level.</p> <p>Sources - Document review - Interview Core Team</p>
<p>1.6 Prohibition and prevention of Forced Labor</p>				
<p>1.6.1 FGV will strengthen the existing procedures and mechanisms to effectively prevent forced and bonded labor, and to establish remediation processes should they occur.</p>	<p>2020 (continuos)</p>	<p>In Progress</p>	<p>1.6.1 Many of the activities and programs under this action plan complement and contribute to efforts in prohibiting and preventing forced labor. The review of our labor policies, strengthening of the recruitment process, developing a human rights training module for workers, among others, are all part of FGV's efforts against forced labor. In relation to this, FGV has installed safety boxes at all of its estates as an option for its workers to keep their passports safely. This initiative will provide them with full autonomy over their personal documents.</p>	<p>1.6.1 FLA reviewed a copy of the revised Guidelines and Procedures for the Responsible Recruitment of Foreign Workers (GPRRFW). FLA confirms that FGV is currently collaborating with the PGC and a local NGO to develop human rights and labor rights training materials for both FGV employees and migrant workers.</p> <p>1.6.1. FLA Workers' Survey confirmed that FGV has installed safety lockers in the two estates surveyed. FLA noted that the estate management in Peninsular Malaysia has installed a CCTV camera near the safety lockers, claiming to prevent unintended events such as robbery and vandalism. The estate management (Peninsular Malaysia)</p>

			<p>FGV has made efforts over the past three years to build and upgrade housing facilities for its plantation workers nationwide.</p>	<p>confirmed that there was no incident such as robbery occurred before. The decision to install a CCTV camera was made solely as a prevention. In the estate surveyed in Sabah, it was found that there was no CCTV camera installed.</p> <p>1.6.1 Interview with Core Team (Plantation Operations) confirmed that there is no procedure established to rule out the need to install a CCTV camera near the safety lockers at the estate level. The estate management, however is given flexibility to determine the need to install such a CCTV camera if they have the financial ability to do so. Interview with the Core Team further confirmed that some estates have already installed the CCTV camera during the first phase of the roll-out of the safety lockers years ago. This includes the surveyed site in Peninsular Malaysia.</p> <p>1.6.1. In terms of worker practices, the FLA Workers' Survey found that 31 percent of respondents use their safety lockers to safe keep their passport, and 34 percent kept passports at home (i.e., not using the safety lockers). Another group of respondents informed that their passports are sent to the authorities for working pass' renewal purpose. Six workers reported that the passports are kept by the estate management. FLA will verify this practice in detail in the upcoming IEA.</p> <p>1.6.1 Workers' Survey found about one-third workers reported that they need to obtain a letter from the management if they wish to go outside the FGV estates (in Peninsular Malaysia) or complex (in Sabah). FLA's review of the sample letter found that the letter requires signature from representative of the estate management. The Core Team clarified that getting the letter is not made mandatory. Workers can opt to disregard the process (i.e., getting the letter). However, FGV informed that the letter is an important document to help workers convince the authorities if they are stopped for a random check. This can reduce risk of arrest and extortion by unscrupulous personnel. FLA will verify in the upcoming IEA if the</p>
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				<p>workers are aware that they do not need to obtain the letter to go out of the estate and/or FGV complex.</p> <p>1.6.1 On remediation, FLA did not receive any evidence to confirm that FGV has established remediation procedures to address incidences of forced labor.</p> <p>Sources</p> <ul style="list-style-type: none"> - Document review - Interview Core Team - FLA Workers' Survey
1.7 Prohibition and prevention of child labor				
1.7.1 FGV will strengthen the existing procedures and mechanisms to prevent child labor, and to establish effective remediation processes should they occur.	2020 (continuous)	In Progress	1.7.1 As an effort to strengthen existing procedures and mechanisms to prohibit and prevent child labor, FGV has reviewed its Group Sustainability Policy (GSP) and Suppliers Code of Conduct (SCOC). As part of the review, a strengthened provision against child labor has been incorporated in the GSP and SCOC. FGV has also drafted a set of Guidelines for Respecting and Protecting the Rights of the Child.	<p>1.7.1 FLA reviewed the revised GSP (SCOC is under revision) that incorporates a commitment to prohibit and prevent the use of child labor.</p> <p>1.7.1 FLA reviewed the draft FGV Group Guidelines and Procedures on Respecting and Protecting the Rights of the Child, and noted that the guidelines include aspects on prevention and remediation of child labor incidences found on site.</p> <p>1.7.1 Interviews with two estate management confirmed that FGV does not employ anyone under 18 years, and strongly prohibits children to be in production sites. The FLA Workers' Survey found awareness among migrant workers on the company's policy to prohibit the use of child labor.</p> <p>1.7.1 With regards to monitoring, interviews with the estate management in Sabah confirmed profiling of migrant workers and their children. However, the estate does not currently monitor children's enrollment at the nearby community learning center (CLC). In the FLA Workers' Survey, about 10 percent of respondents reported that they have children aged 7-17 years but not enrolled in any form</p>

				<p>of education, including the CLC. Another 10 percent of workers claimed that they have seen children (below 18 years) on site. These indicate a risk of child labor. FLA will further investigate this finding in the upcoming IEA, including getting inputs from teachers at the CLC and local villagers.</p> <p>Sources</p> <ul style="list-style-type: none"> - Document review - Interview Estate Management - FLA Workers' Survey
1.8 Promotion of the right to freedom of association				
1.8.1 FGV will develop procedures and mechanisms to strengthen the enjoyment of workers' right to freedom of association and to unionize.	2020 (continuous)	In Progress	1.8.1 FGV recognizes and respects the right of workers to freedom of association. FGV periodically engages its 14 in-house unions and two national unions. FGV has concluded and signed collective agreements with these unions for the period 2019-2021. FGV has included a strengthened provision on the right to freedom of association in its revised SCOC and revised GSP.	<p>1.8.1 FLA reviewed FGV's commitment to recognize and respect employees' right to freedom of association and to collective bargaining in its GSP and draft SCOC. It is now aligned with the FLA standards.</p> <p>1.8.1 FLA Workers' Survey found lack of awareness among migrant workers on their right to association. The FLA Workers' Survey found that one in every two respondents said that they have never been informed by the company on their right to associate. Interviews with FGV Core Team (Group Sustainability Division) reflect that FGV is committed to raising awareness among its workers on their right to associate. Raising awareness on the workers' right to association is one important element in its training collaboration with the local NGO. A review of the training modules developed by the local NGO (for FGV) confirmed that it already included an element on the right to association.</p> <p>1.8.1 FLA confirmed that FGV has engaged the in-house unions on a regular basis and signed collective agreements with the unions. Interviews with the representatives of the in-house unions (representing Peninsular Malaysia and Sabah) confirmed that no migrant worker is a member of</p>

				<p>the unions. All union members (including migrant workers) have to contribute a monthly (RM5-6 (US\$1.50)). This requirement needs to be made clear to migrant workers before they agree to become members. Some technical challenges were noted in the payment of this monthly contribution (e.g., do the estates need to deduct from their salary, etc.). The representatives of the in-house unions stressed that there is no restriction on migrant workers to join the union. The representative of one of the in-house unions welcomed an open dialogue with the migrant workers and FGV management if they wish to encourage migrant workers to join the in-house unions.</p> <p>Sources</p> <ul style="list-style-type: none"> - Document review - Interview Core Team - FLA Workers' Survey - Interview with In-House Union Representatives
<p>1.9 Promotion of gender equality and empowerment of women</p>				
<p>1.9.1 FGV will develop – through the establishment of a Gender Committee – policies, procedures and mechanisms to promote gender equality and women empowerment in FGV's operations.</p>	<p>2020 (continuous)</p>	<p>In Progress</p>	<p>1.9.1 FGV has established its Committee on Gender Equality and Women Empowerment. The terms of reference (TOR) for the Committee had been developed and input on the draft TOR has been obtained from internal and external stakeholders. FGV organised a consultation with civil society organisations (CSOs) and other relevant external bodies on 18 January 2021.</p>	<p>1.9.1 Interviews with Core Team (Group Sustainability Division) confirmed that FGV has established the Committee on Gender Equality and Women Empowerment on February 19, 2021. FLA verified further evidence to confirm its establishment. FGV made a public announcement to inform about the establishment of the Committee and the convening of its first Committee's meeting, in conjunction with the International Women's Day in 2021.</p> <p>1.9.1 FLA reviewed the Terms of Reference (TOR) for the Gender Committee, and inputs received from internal and external stakeholders. FLA's review of the TOR noted that it has included essential components to respect and promote gender equality and women empowerment such as corporate respect to women rights on the basis of non-</p>

				<p>discrimination; equal access to opportunities; gender-responsive and gender-mainstreaming in its policy making and programing; and equal pay for work of equal value (to mention a few). The TOR also reiterates its commitment to uphold relevant international standards, including the Universal Declaration of Human Rights (UDHR), Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), the United Nations Guiding Principles on Business and Human Rights (UNGP-BHR), and the Beijing Declaration and Plan of Action and the Women Empowerment Principles. The TOR has also clearly laid out the commitment and responsibilities of the Committee and its appointed members, including to establish a competent mechanism to address, and provide remedy for, any violation of women’s rights.</p> <p>FLA confirmed that a consultation was held with CSOs and other organizations on January 18, 2021 and an internal discussion was held on February 19, 2021 to discuss the formation of the FGV Committee on Gender Equality and Women Empowerment</p> <p>1.9.1 Based on the TOR, the Committee Members include the following personnel (below). FLA noted that based on the list below (see items number 20 and 21), the Committee will identify the Representatives of women employees and Representatives of workers union. This indicates the lack of consultative process, and employees’ and workers’ determination to select their representatives to represent them in the Committee.</p> <ol style="list-style-type: none"> 1. Group Divisional Director of Plantation Sector 2. Group Divisional Director of Logistics & Support Businesses Sector 3. Group CEO of MSM Malaysia Holdings Berhad 4. Chief Consumer Products Officer 5. Head of Integrated Farming 6. Group Chief Strategy Officer 7. Group Chief Strategic Communications Officer 8. Head, Group Governance and Risk Management
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				<ol style="list-style-type: none"> 9. Head of Group Sustainability 10. General Counsel, Group Legal 11. Head, Group Health, Safety and Environment 12. Chief Internal Auditor 13. Head, Company Secretarial 14. Head, Group Procurement 15. Group Financial Controller 16. Head of Upstream, Plantation Sector 17. Head of Downstream, Plantation Sector 18. Head of Marketing and Trading, Plantation Sector 19. Head, Field Workforce Division & Settlers Engagement 20. Representative of women employees (to be identified by the Committee) 21. Representative of workers union (to be identified by the Committee) <p>1.9.1 Interview with Core Team (Group Sustainability Division) confirmed that there has not been any concrete procedure and mechanism established by FGV to promote gender equality and women empowerment. This procedure and mechanism will be among the main tasks of the Committee on Gender Equality and Women Empowerment once established.</p> <p>Sources - Document review - Interview Core Team</p>
Principle 2: Company Staff and Implementing Partner Training - Company affiliate identifies and ensures that the specific personnel responsible for implementing labor standards are trained and are aware of the workplace standards criteria.				
2.1 Improve FGV's organizational chart				
2.1.1 FGV's organizational chart will contain comprehensive information such as the	2020 (Q2)	Implemented	2.1.1 A Core Team comprising representatives of the relevant departments and divisions within FGV has been established to execute the action plan. The Core Team meets periodically to discuss the implementation	2.1.1 FLA confirmed the formation of the FGV Core Team, and the organizational chart containing information of the appointed representatives from relevant departments and divisions. FLA observed the appointment letter signed by the Group CEO to the Core Team members. Interview with

number of responsible staffs to implement the Action Plan.			of the action plan.	<p>Core Team (Group Sustainability Division) confirmed the various tasks and responsibilities of the Core Team members in implementing the FGV Action Plan. While Core Team members have their own responsibilities within their scope of work, GSD plays an important role to support and ensure they accomplish the tasks in a timely manner. In the event where responsibilities cut across different divisions/departments, the GSD coordinates the implementation of the action items, including hosting a multi-divisions meetings and engagements.</p> <p>Sources - Document review - Interview Core Team</p>
2.2 Improve job descriptions				
2.2.1 The job descriptions will include clear roles and expectations of the responsible staffs in implementing the Action Plan.	2020 (Q2)	Implemented	2.2.1 A Terms of Reference (TOR) has been developed to specify the roles and responsibilities of FGV's personnel who have been assigned to implement FGV's Action Plan under its FLA affiliation. These personnel make up the Core Team, who primary function is to coordinate the implementation of the Action Plan.	<p>2.2.1 FLA received the Terms of Reference (TOR) of the appointed Core Team members with dedicated responsibilities to implement the FGV Action Plan 2020 and other tasks managing FGV affiliation with FLA. FLA's review of the TOR confirmed that it has clearly indicated the roles and expectations of the appointed Core Team members.</p> <p>Source - Document review</p>
2.2.2 The FLA will work with FGV to develop Key Performance Indicators (KPIs) to oversee the implementation of the Action Plan.	2020 (Q2)	Implemented	2.2.2 FGV has drafted the KPI to enable responsible persons / officials to oversee the implementation of FGV Action Plan.	<p>2.2.2 FLA received the KPIs established by FGV to guide the responsible officials in the implementation of FGV Action Plan, and other tasks managing FGV affiliation with the FLA. The KPI contains adequate elements to ensure an effective implementation of the Action Plan, including the FLA Benchmarks, Description of Activities, Remarks, Timeline, Person Responsible, Output, Outcome, and Intended Impact.</p> <p>Source - Document review</p>

2.3 Strengthen the appointment process of responsible staff				
2.3.1 FGV will create a chart/model of the appointment process of its responsible staffs in charge of labor standards at headquarters and operational levels	2020 (Q2-4)	Implemented	2.3.1 Specific personnel from the relevant divisions have been assigned, through the establishment of the Core Team, to coordinate the implementation of the action plan. The functions and roles of the Core Team are specific in the TOR which have been established. The composition of FGV's Group Sustainability Division has been strengthened with the appointment of personnel for the positions of the Head of Sustainability Regulations, and Traceability and Supply Chain Mapping Executive, respectively. FGV is also appointing a Manager for Social Programs under GSD, who is expected to report duty in early March 2021.	<p>2.3.1 FLA reviewed the internal Core Team Management document, describing the various components of internal coordination and management of FGV affiliation with FLA.</p> <p>2.3.1 Besides, interviews with Core Team (Group Sustainability Division) confirmed the new appointment of FGV employees in charge of Sustainability Regulations, Traceability and Supply Chain Mapping, and Social Programs. The appointment of these employees took into consideration of their previous employment history and skill set relevant to their current responsibility with the FGV, including on matters related to labor standards.</p> <p>Sources - Document review - Interview Core Team</p>
2.4 Implement staff training on labor standards and social performance				

<p>2.4.1 FGV will develop an interactive and action-based training on labor rights and international frameworks, involving all key staffs including at plantation level management. The training will adopt a training of trainers (ToT) approach to reach a maximum impact on the ground.</p>	<p>2020 (Q2-Q4)</p>	<p>Implemented</p>	<p>2.4.1 FGV is collaborating with Procter & Gamble Chemicals (PGC) to develop step-wise training curriculum and materials on human rights, classified under “Basic”, “Proficient” and “Advanced”, targeted at different levels within the FGV organization and each having to meet different levels of qualification requirements. The objectives of the training material, which will take the form of short videos, posters and booklets, are as follows:</p> <ul style="list-style-type: none"> i. To promote awareness and understanding among all FGV employees on the fundamental principles of human rights, the corporate responsibility to respect human rights, and on rights of workers that all FGV employees should be able to enjoy. ii. To promote awareness on the importance of personal protective equipment (PPE) for workers both in operations and at headquarters. <p>The development of the two videos has been completed. FGV together with PGC are now finalizing the Malay versions of the videos.</p> <p>FGV is also collaborating with a Malaysian human rights NGO to develop and implement the following:</p> <ul style="list-style-type: none"> i. A human rights training module for FGV’s plantation workers. The training will include components to raise awareness and understanding on forced labor and human trafficking, on the employment contract and on grievance mechanism. The draft 	<p>2.4.1 FLA confirmed that FGV is collaborating with Procter & Gamble Chemicals (PGC) to develop step-wise training curriculum and materials (videos, posters, and handouts) on human rights. The step-wise approach refers to development of training curriculum and materials based on the different level of knowledge, need and roles among the targeted recipients (i.e., employees). Interviews with PGC confirmed that the training collaboration between FGV and PGC is currently targeting the FGV employees at the headquarters and operational (including mill and estate) levels. Interviews with the local NGO confirmed that the target group focuses on migrant workers at the estate level.</p> <p>2.4.1 FLA confirmed that FGV and PGC have finalized two training videos on human rights and health and safety (in English). Interviews with Core Team (Group Sustainability Division) and PGC confirmed that they are currently finalizing the Malay version of the training videos.</p> <p>2.4.1 Interviews with the local NGO confirmed that FGV is finalizing the training modules targeting migrant workers at the estate level. FLA received a copy of training modules developed by the local NGO. In terms of training roll-out, the local NGO confirmed that the training will use a training of trainers (ToT) approach. As of end of February 2021, no virtual and physical training and/or trial run has been conducted due to travel restriction (related to COVID-19 outbreak).</p> <p>2.4.1 FLA confirmed a series of training sessions it conducted for FGV employees on a range of labor standards issues, including grievance mechanism, responsible recruitment of migrant workers and labor standards monitoring. These include:</p> <ul style="list-style-type: none"> - FLA Workshop on Improving Labor Standards Monitoring on November 2, 3, 4, 6 and 23, 2020 (virtual) - FLA Follow-Up Training on Labor Standards Monitoring System on December 14, 2020 (virtual)
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			<p>module has been developed and a trial run of the module is expected to be conducted in March 2021.</p> <ul style="list-style-type: none"> ii. A training of trainers program for the implementation of the human rights training. iii. A review of FGV’s pre-departure and post-arrival orientation pack for the recruitment of migrant workers. iv. A human rights training for operations managers. v. Development of a human rights module to be included in the pre-departure orientation program for migrant workers. vi. Training of Trainers for FGV personnel who will be conducting the Pre-departure orientation in the source country. 	<ul style="list-style-type: none"> - FLA Workshop on Strengthening FGV Guidelines and Procedures on Responsible Recruitment of Migrant Workers on December 9, 2020 (virtual) - FLA Workshop on Strengthening Grievance Mechanism on January 21, 2021 (virtual) <p>Sources</p> <ul style="list-style-type: none"> - Document review - Interview Core Team - Interview External Stakeholders (PGC and a local NGO)
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Principle 3: Supplier Training – Company affiliate obtains commitment, drives supplier awareness of labor standards, and tracks the effectiveness of supplier workforce training

3.1 Strengthen recruitment agencies’ compliance with labor standards				
3.1.1 FGV will include relevant clauses in the contract with the recruitment agencies that are aligned with the FLA CoC.	2020 (Q2)	Implemented	3.1.1 FGV’s contract with recruitment agencies has been reviewed to, <i>inter alia</i> , strengthen requirements for the recruitment agencies to respect human rights and to comply with the laws of the countries of origin and destination, and with fundamental principles and rights at work as well as international labour standards.	3.1.1 FLA received the revised sample of the recruitment agency contract on March 1, 2020. Section 5.1 adequately covers a range of labor standard requirements for recruitment agencies such as; (i) respect and comply with the laws and regulations in source and destination countries; (ii) standard recruitment fees; (iii) respect human rights, including internationally recognized human rights principles and rights at work; (iv) and respect workers dignity, including avoiding any forms of inhumane treatment and coercion throughout the recruitment process.

				Source - Document review
3.1.2 FGV will brief recruitment agencies on the improved contract and new requirements, and support the implementation of the clauses when needed	2020 (Q4)	Implemented	3.1.2 & 3.1.3 - A draft survey has been developed to serve as a pre-sourcing assessment for recruitment agencies. Once, the survey has been finalized, briefings will be conducted with the recruitment agencies.	<p>3.1.2 Interview sessions with Core Team (Group Sustainability Division and Field Workforce Division) and a review of evidence submitted by FGV confirmed that they conducted a socialization process to update its existing recruitment agencies based in India and Indonesia on the revised contract agreement, communication pack and recruitment cost from October 10 – 16, 2020. This was further confirmed during interviews with two FGV recruitment agencies.</p> <p>3.1.2 Interviews with two FGV recruitment agencies confirmed that there has been no new recruitment of migrant workers taken place between March 2020 and February 2021.</p> <p>Sources - Document review - Interview Core Team - Interview two FGV Recruitment Agencies</p>
3.1.3 FGV will develop a mechanism for monitoring and assessment of the implementation of the labour standards by recruitment agencies.	2020 (Q4)	Implemented		<p>3.1.3 FLA received the Pre-Sourcing Assessment for recruitment agencies. Interviews with Core Team (Group Sustainability Division) confirmed that the Pre-Sourcing Assessment aims to assist FGV to monitor and assess the recruitment practices of its recruitment agencies. A review of the Pre-Sourcing Assessment found that it adequately covers questions covering the recruitment agencies' profiles, recruitment cost and processes.</p> <p>Sources - Document review - Interview Core Team - Interview two FGV Recruitment Agencies</p>

3.2 Organize workers' training				
<p>3.2.1 Training will focus on issues related to labour rights and labour standards at the workplace, including the FLA CoC, employment contract and pay slip. The training will be conducted for all workers in 2020 and to be repeated on a periodic basis.</p>	<p>2020 (continuous)</p>	<p>In Progress</p>	<p>3.2.1 Please refer to 2.4.1.</p>	<p>3.2.1 & 3.2.2 FLA confirmed that FGV is currently collaborating with a local NGO in developing training materials covering various aspects of human rights and labor rights, including the FLA Workplace CoC. The training modules aim to raise awareness among migrant workers on their rights.</p> <p>3.2.1 & 3.2.2 FLA received the copy of training modules developed by the local NGO confirming the various aspects of human rights and labor rights training for migrant workers, including prohibition of child labor, forced labor, minimum wage, right to association and access to effective grievance mechanism. The modules include simple and easy-to-follow training materials for migrant workers.</p>
<p>3.2.2 FGV will develop simple, illustrated materials for workers and their families.</p>	<p>2020 (continuous)</p>	<p>Implemented</p>	<p>3.2.2 Please refer to 2.4.1.</p>	<p>3.2.1 & 3.2.2 Interviews with the local NGO confirmed that the training roll-out will leverage the training of trainers (ToT) approach, targeting migrant workers representatives. The modules are yet to be pilot-tested. FGV and the local NGO are expecting to undertake a trial run in selected estates in March/April 2021, dependent on the COVID-19 situation. Upon completion of the trial run, FGV and the local NGO expect to make the necessary adjustment on the modules and design a comprehensive roll-out plan in subsequent months.</p> <p>3.2.1 & 3.2.2 FLA Workers' Survey found that nearly 50 percent of the respondents had no specific training on labor rights. For those that have reported having been trained on labor rights (about 42 percent), they refer the training as "roll-call" / "morning-call" where the estate management informed them on matters mostly related to safety and health, wages and prohibition of children assisting parents on site. Findings from the survey reinforce the need to strengthen FGV efforts in providing effective training programs for workers.</p>

				<p>Sources</p> <ul style="list-style-type: none"> - Document review - Interview Core Team - FLA Workers' Survey - Interview External Stakeholder (a local NGO)
<p>Principle 4: Functioning Grievance Mechanisms – Company affiliate ensures workers, farmers, and their family members (where applicable) have access to functioning grievance mechanisms, which include multiple reporting channels of which at least one is confidential.</p>				
<p>4.1 Training and information sharing on grievance mechanisms and grievance redressal</p>				
<p>4.1.1 FGV will conduct training on grievance redressal for plantation level staff (including supervisors, crew leaders, and worker committees) as well as providing adequate information to workers on how and where to raise complaints and grievances.</p>	<p>2020 (continuous)</p>	<p>In Progress</p>	<p>4.1.1 With regard to the training on the grievance mechanism for plantation workers, refer to 2.4.1.</p>	<p>4.1.1 FLA confirmed that grievance training is one aspect included in the training modules developed by the local NGO, in collaboration with FGV (see item 3.2.1 and 3.2.2 above). Interviews with the local NGO confirmed that training on grievance will include migrant worker representatives. However, due to the COVID-19 outbreak, no training has been delivered as of February 2021. FLA's review of the grievance training module (identified as Module 9) found that it includes aspects of grievance raising, definition of grievance, grievance policy, and other external channels where workers can raise their grievances, including raising their grievances to embassies, trade union and NGOs.</p> <p>4.1.1 Interviews with Core Team (Field Workforce Division; One-Stop-Center; and Plantation Operations) confirmed that there are multiple grievance channels available for migrant workers at the estate level. These channels include the grievance logbook system, complaint boxes, workers' careline and whistleblowing. However, FLA Workers' Survey found lack of awareness among the workers, particularly on the presence and use of workers' careline and the whistleblowing channel. This finding reinforces the need for FGV to strengthen the socialization process, ensuring workers' awareness on the availability</p>

				<p>and use of the existing grievance mechanism. FLA also noted that workers lack confidence and trust in the existing grievance channels, and hence they don't use them. Finally, FLA found the absence of effective worker representation structures, especially migrant workers where they may feel more comfortable raising their grievances.</p> <p>Sources</p> <ul style="list-style-type: none"> - Document review - Interview Core Team - FLA Workers' Survey - Interview External Stakeholder (a local NGO)
4.2 Strengthening the grievance mechanism				
4.2.1 FGV will strengthen its grievance mechanisms by, among other things, exploring a partnership with independent third-party organizations, as well as to assess effectiveness.	2020 (continuous)	In Progress	4.2.1 FGV is collaborating with three organizations under an umbrella project of the Roundtable for Sustainable Palm Oil (RSPO) to strengthen FGV's grievance mechanism. The project is currently at the pilot stage. FGV has identified one its Complexes for the pilot project. A survey has been developed to serve as a baseline for the project. FGV has also reviewed and strengthened its Workers' Grievance Management Processes.	<p>4.2.1 FLA confirmed that FGV is currently collaborating with several partners under the umbrella project of the RSPO – with the aim to strengthen its grievance mechanism. As of end February 2021, the planned survey had not been conducted due to travel restriction (related to COVID-19).</p> <p>4.2.1 FLA confirmed that an internal workshop was jointly conducted by FLA and FGV on January 21, 2021. The workshop was organized with the objective to identify gaps and areas for further improvement in its existing grievance mechanisms. A set of recommendations were submitted by FLA for further action by FGV.</p> <p>Source</p> <ul style="list-style-type: none"> - Document review
Principle 5: Monitoring – Company affiliate conducts workplace standards compliance monitoring				
5.1 Develop and strengthen a comprehensive labor standards compliance system				

<p>5.1.1 The labor standard compliance system will include risk assessment plan and methodology, monitoring and evaluation, field data collection and verification methodology, organizing specific training for compliance, collaboration with other stakeholders and the planned utilization of assessment and monitoring results for continuous improvement.</p>	<p>2020 (continuous)</p>	<p>In Progress</p>	<p>5.1.1 FGV will work together with the FLA to develop a labor standards compliance system. FGV participated in a series of workshops conducted by the FLA in December 2020 on the development of an Internal Monitoring and Remediation System (IMRS). Taking into account recommendations by the FLA that arose from the workshop, FGV is developing its IMRS.</p>	<p>5.1.1 FLA conducted a series of joint workshops in November and December 2020 with the various FGV divisions on analyzing gaps in their internal monitoring system. Based on the workshops, FLA submitted a set of recommendations to FGV for further deliberation. Interviews with Core Team (Group Sustainability Division) confirmed that it is currently working on developing a comprehensive labor standard monitoring document which encompasses various aspects of monitoring, evaluation, remediation, training and supply chain engagement.</p> <p>Sources - Document review - Interview Core Team</p>
<p>5.2 Improve Human Resources (HR) management of staff and workers</p>				
<p>5.2.1 FGV will improve HR management and record-keeping of staff and workers in all its owned operations. This will enhance the company's accountability and transparency, particularly in managing the employer-employee relationship, in</p>	<p>2020 (Q2)</p>	<p>In Progress</p>	<p>5.2.1 FGV has in place a filing system that records information about workers as well as relevant documentation about the workers employment including the employment contract, work permits as well as copies identification documents for record purposes.</p>	<p>5.2.1 Two interviews with estate management in Peninsular Malaysia and Sabah confirmed the presence of an internal filing system that records workers' profiles, as well as relevant documentation such as employment contract (in a language the workers understand), training records, grievance-related information, children and dependent records in estate (for Sabah), work permits and copies of identity documents (for record purposes). FLA confirmed that the workers' profiles have been documented in a centralized online data management database known as <i>eRML system</i> (e-Summary of Estate Information, or locally known as <i>e-Rumusan Maklumat Ladang</i>). An evidence of eRML system was submitted to FLA. FLA is in the process of evaluating the information recorded in the eRML system,</p>

alignment with the FLA CoC. It includes record-keeping of information on the language of contract provided, input to survey on recruitment fees, type of training conducted, family members accompanying, etc.				in detail. Sources - Document review - Interview Estate Management
5.3 Strengthening the working and living conditions of workers				
5.3.1 FGV will continue its cooperation with the Human Rights Commission of Malaysia (SUHAKAM) to strengthen FGV's compliance with labour standards concerning the working and living conditions of its workers, though assessments and verification exercises.	2020 (Q4)	Implemented	5.3.1 FGV is collaborating with the Human Rights Commission of Malaysia (SUHAKAM) to assess the working and living conditions of FGV's workers. The first site assessment was conducted at FGV's Besout 6 and Besout 7 estates on 14 December 2020. Additional assessments will be conducted by SUHAKAM.	5.3.1 FLA confirmed with SUHAKAM on the collaboration with FGV and the site assessments. SUHAKAM shared that based on the site visit, it was found that workers are provided with decent working and accommodation standards. SUHAKAM expressed interest to continue its working and living condition assessment in other FGV estates including in its Sabah operations in 2021. SUHAKAM informed that it conveyed its intention to FGV to undertake an unannounced assessment in the future. Sources - Document review - Interview Representatives of SUHAKAM
Principle 6: Collection and Management of Compliance Information – company affiliate collects, manages and analyses labor standards compliance information.				
6.1 Develop an information management system accessible to the FLA				

<p>6.1.1 The information management system aims to gather and manage traceability data, and strategy to share such information with the FLA</p>	<p>2020 (continuous)</p>	<p>In Progress</p>	<p>6.1.1 FGV has developed a computerized traceability system called Traceability of Product or FGV-ToP. This is part of our overall Sustainable Palm Oil Management System (SPOMS) that also includes an Audit Compliance Integrated Management System (FGV-AIMS). With FGV-ToP, FGV’s customers can now obtain details such as the certification, geolocation and production per month of a mill from the system.</p>	<p>6.1.1 FLA confirmed that FGV has developed a computerized traceability system called Traceability of Product (FGV-ToP) in its efforts to gather and manage traceability information. Interviews with Core Team (Group Sustainability Division) confirmed that with the upgraded FGV-ToP system, traceability data can be obtained, collated and visualized in a presentable manner to all/relevant stakeholders. Other relevant FGV internal departments / divisions can make use of the system to monitor suppliers’ sustainability compliance status and their Fresh Fruit Bunches (“FFB”) supply. A review of the FGV-ToP information found that it covers minimal information related to labor. FGV plans to work closely with the FLA during 2021 to update the type of information to be collected and continue data collection.</p> <p>6.1.1 During the series of FLA-FGV Workshops on Labor Standards Monitoring organized on November 2, 3, 4, 6 and 23, 2020 FLA noted that FGV lacks a centralized database to; (i) record and manage workers information; (ii) compile reports from internal and external monitoring visits, as well as relevant corrective action plan documents; and (iii) maintain list of labor recruitment agencies, contractors and overview of their workers. This information is maintained in silos by various divisions, including the estate management. FLA recommended FGV to have a centralized data management system where there is a seamless information flow between the various divisions, departments and business units (at the operational level).</p> <p>Sources - Document review - Interview Core Team</p>
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Principle 7: Timely and Preventative Remediation – company affiliate works with suppliers to remediate in a timely and preventative manner.

<p>7.1 Regularization and monitoring of undocumented migrant workers</p>	<p></p>
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<p>7.1.1 FGV will identify and monitor periodically – the total number of undocumented migrant workers currently hired in its owned operations and the status of rehiring/regularization program.</p>	<p>2020 (Q2) (continuous)</p>	<p>In Progress</p>	<p>7.1.1 & 7.1.2 The regularization exercise is an initiative introduced by the Sabah State Government and the power to regularize workers lies solely in the hands of the relevant authorities. While FGV has done its part to register 6,158 workers under this program, we are made to understand that the regularization exercise has been put on hold since September 2020. FGV has been in contact with the Sabah State authorities about the matter but has not been informed of any decision by the Sabah State to resume the regularization process. FGV will continue to engage with the authorities with a view to seeing through the resolution of the matter.</p>	<p>7.1.1 A review of the draft FGV Group Guidelines and Procedures for Responsible Recruitment of Foreign Workers found the FGV commitment to strictly adhere to the conditions and regulations determined by the government when participating in the government-led regularization program. 7.1.1 FLA confirmed receipt of the updated information, detailing the status of migrant workers under regularization program in its operations in Sabah. This has confirmed that FGV is continuously monitoring the application status of its migrant workers under regularization program. 7.1.1 Interviews with Core Team (Field Workforce Division) confirmed that each worker enrolled in the regularization program had signed a mutual agreement (<i>Perjanjian Bersama</i>) with FGV. The mutual agreement is an internal initiative initiated by FGV to ensure workers are guaranteed with the same benefits with other documented migrant workers. The Core Team (Field Workforce Division) further confirmed that all migrant workers under regularization program also receive the same salary and most benefits, excluding accident insurance if they are injured outside the estate and social security (SOCSO). Field Workforce Division clarified that based on existing regulations and procedures established by the government, migrant workers under regularization are not entitled to subscribe the formal social security coverage, until their regularization application has been fully granted. The FLA Workers’ Survey highlighted that salary payments to “migrant workers under regularization” are made in cash given that they don’t have a bank account. FLA considers this as a risk for migrant workers under the regularization program. Despite the absence of valid passport and/or working pass, migrant workers under regularization program should benefit from the cashless payment system, social protection and compensation on par with SOCSO.</p> <p>Sources</p>
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				<ul style="list-style-type: none"> - Document review - Interview Core Team - FLA Workers' Survey
7.1.2 FGV will engage legal experts/practitioners to provide a legal opinion on the status of migrant workers who are in the regularization process in order to improve remediation	2020 (Q2) (continuous)	Planned		7.1.2 FLA did not receive any further information and evidence indicating that FGV has engaged any legal experts or practitioners to seek advice on matters relating to the status of its migrant workers under regularization program.
7.1.3 FGV will develop procedures in preventing the hiring of undocumented migrant workers and the remediation strategy in dealing with unexpected future of undocumented workers.	2020 (Q2) (continuous)	In Progress		<p>7.1.3 FLA received a copy of the revised internal SOP guiding the hiring of migrant workers under regularization. The guidance makes references to GSP, SCOC (current) and Guidelines on Responsible Recruitment. It includes a commitment from FGV to cover the cost of regularization.</p> <p>7.1.3 FLA did not receive any concrete evidence that FGV has developed a remediation strategy to deal with the unexpected events deriving from the regularization process. Interviews with Core Team (Group Sustainability Division and Field Workforce Division) found that FGV did not have a strategy should the workers be unable to have their regularization application approved.</p> <p>Sources</p> <ul style="list-style-type: none"> - Document review - Interview Core Team
7.1.4 FGV will regularly and publicly update its progress, including steps taken to prevent and remedy, in the event where undocumented migrant	2020 (Q2) (continuous)	In Progress		<p>7.1.4 FLA confirmed receipt of the updated information and progress of its migrant workers under regularization. However, the information received did not include steps taken to prevent and remedy in the event when undocumented migrant workers are found in its operations.</p> <p>Source</p>

workers are found in its owned operations.				- Document review
7.2 Strengthen FGV's commitment and practices on fair recruitment practices				
7.2.1 FGV, through its current joint project with the United Nations International Organization for Migration (IOM) and the Earthworm Foundation, will undertake workers' survey on recruitment fees for the purpose of continuous improvement of its fair recruitment practices. The findings and recommendations arising from this exercise will inform the formulation of FGV's remediation measures concerning recruitment fees. The report and follow-up plans will be made available.	2020 (Q2-Q3)	In Progress	7.2.1 FGV has participated in the labor supply mapping project conducted by the United Nations International Organisation for Migration (IOM) and the Earthworm Foundation (EF). The scope of this collaborative project includes reviewing the process of recruitment of migrant workers and to upgrade FGV's internal processes and procedures in line with international standards. Consultations between FGV and IOM and EF have been carried out to discuss the draft report of the project.	7.2.1 FLA confirmed that FGV has participated in the labor supply mapping project conducted by the IOM and EF and received the report. A review of the report confirmed that the scope of the project included the recruitment process and cost. Interviews with the IOM and EF confirmed that the report has been submitted to FGV. Further discussion between FGV, IOM, and EF will continue in 2021 to ensure effective implementation of recommendations, including remediation measures concerning recruitment fees. Sources - Document review - Interview External Stakeholders (IOM & EF)
7.2.2 FGV will continue engaging in dialogue with other stakeholders, including the Roundtable on Sustainable Palm Oil (RSPO) in addressing systemic issues relating	2020 (Q2-Q3)	In Progress		7.2.2 FGV-FLA jointly organized a workshop to assess the existing procedures and mechanism in addressing unethical recruitment practices on December 9, 2020. A set of recommendations were submitted by FLA for FGV's further deliberation. Interview with Core Team (Group Sustainability Division) confirmed that FGV is currently working on revising its Guidelines and Procedures for the Responsible Recruitment of Foreign Workers (GPRRFW).

<p>to fair recruitment practices. FGV is also committed to engaging workers' representatives and local organization in these dialogues.</p>				<p>7.2.2 FLA received evidence to confirm FGV's engagement with the RSPO and Malaysian Palm Oil Association (MPOA) to discuss critical labor issues in the palm oil sector, including recruitment of migrant workers.</p> <p>7.2.2 FLA is yet to receive evidence confirming FGV's engagement with workers' representatives to discuss fair recruitment practices.</p> <p>Sources</p> <ul style="list-style-type: none"> - Document review - Interview Core Team
<p>7.2.3 FGV will review its repatriation practices to ensure compliance with labour standards.</p>	<p>2020 (Q4)</p>	<p>In Progress</p>		<p>7.2.3 FLA confirmed receipt of four existing procedures regulating the repatriation of migrant workers. These include</p> <ul style="list-style-type: none"> - procedures to repatriate workers who have completed their employment contract; - procedures to repatriate workers who have commitment against disciplinary codes; - procedures to repatriate workers who have health issues; - procedures to repatriate workers for short-term holiday. <p>A review of these procedures found that they were last revised on September 1, 2019.</p> <p>7.2.3 Interviews with external stakeholders (FGV recruitment agencies) confirmed that there has been repatriation of migrant workers from Malaysia to origin country(ies) during the reporting period. Repatriation was organized for workers who have completed their term of employment.</p> <p>Sources</p> <ul style="list-style-type: none"> - Document review - Interview External Stakeholders (FGV recruitment agencies)

7.3 Strengthen the post-arrival orientation program for migrant workers				
7.3.1 FGV will strengthen the post-arrival orientation program for newly arrived workers. The post-arrival orientation program will include training on FGV's labor policies, workers' rights and responsibilities, no recruitment fees, no retention of passports and a choice to use employer-provided lockers, taking leave and exiting the premises and repatriation procedures.	2020 (Q4)	In Progress	7.3.1 & 7.3.2 FGV is collaborating with a local human rights NGO to, among other things, strengthen FGV's post-arrival orientation program by reviewing the post-arrival orientation pack.	7.3.1 Interviews with the local NGO confirmed that the training development includes the strengthening of FGV's post-arrival orientation program. A detailed review of the training modules developed by the local NGO confirmed that the training modules include aspects of workers' rights and responsibilities, recruitment fees, workers' freedom to keep their own passport and other aspects of workers' freedom of movement. While the training modules have been developed, no actual or pilot test was implemented by the end of February 2021. Sources - Document review - Interview External Stakeholders (a local NGO)
7.3.2 FGV is exploring opportunities to collaborate with a labor rights NGO in Malaysia in strengthening the post-arrival orientation module.	2020 (Q4)	In Progress		7.3.2 As mentioned in item 7.3.1, FGV is collaborating with the local NGO to further improve its training modules as well as labor standards practices, including the post-arrival orientation program. The modules will be piloted in March/April 2021 dependent on the COVID-19 situation. Sources - Document review - Interview External Stakeholder (a local NGO)
7.4 Enhance communication pack				
7.4.1 The communication pack aims to raise awareness among migrant	2020 (Q2-Q4)	In Progress	7.4.1 & 7.4.2 FGV is collaborating with a local human right NGO to, among other things, strengthen FGV's pre-departure orientation program by	7.4.1 Interviews with the local NGO confirmed that FGV is currently improving the existing "communication pack" to align with the internationally recognized labor standards. The "communication pack" is an orientation package that is

<p>workers during their recruitment process (in origin country), upon arrival in Malaysia and those that are already worked on sites.</p>			<p>reviewing the pre-departure orientation pack and by including a survey to identify any fees paid by workers in the recruitment process.</p>	<p>used by FGV and its appointed recruitment agencies during pre-departure and post-arrival orientation programs.</p> <p>7.4.1 Interviews with FGV’s One-Stop-Center confirmed that the existing “communication pack” is available in both PowerPoint slides and video format. The One-Stop-Center located in Peninsular Malaysia is responsible to undertake an orientation program, using the “communication pack” for newly arrived workers in Malaysia (for Peninsular Malaysia). There is no One-Stop-Center currently located in Sabah. FGV has representatives of the One-Stop-Center located in India and Indonesia.</p> <p>7.4.1 The orientation program usually takes place three or four days before workers are deployed to the FGV estates. A review of the existing “communication pack” confirmed that it includes various aspects of labor standards such as minimum wage, hours of work, grievance and complaints, safety and health, housing and amenities.</p> <p>7.4.1 Interviews with Core Team (Group Sustainability Division) confirmed that the collaboration with the local NGO includes the strengthening of the existing “communication pack”, particularly the inclusion of recruitment process.</p> <p>Sources - Document review - Interview Core Team - Interview FGV’s One-Stop-Centre</p>
<p>7.4.2 The communication pack will also include a pre-departure survey to identify the costs paid by workers during their recruitment process (before they are</p>	<p>2020 (Q2-Q4)</p>	<p>In Progress</p>		<p>7.4.2 Interviews with Core Team (Group Sustainability Division) and review of a proposal further confirmed that the collaboration with the local NGO also includes the strengthening of recruitment cost (including cost survey) in the “communication pack.”</p> <p>Sources - Document review</p>

introduced to FGV)				- Interview Core Team
Principle 8: Responsible Procurement Practices – Company affiliate aligns procurement practices with a commitment to labor standards.				
8.1 Strengthen procurement policy and practice				
8.1.1 FGV will review and amend (where needed) the contract (procurement), which amendments may include supply chain disclosure and access to facilities/growers for assessments/by the FLA.	2020 (Q4) (continuous)	In Progress	<p>8.1.1 All of FGV’s contracts with suppliers and vendors are subject to FGV’s Suppliers Code of Conduct (SCOC). The SCOC has been reviewed and amended towards aligning it with the FLA CoC.</p> <p>FGV has reviewed its agreement with fresh fruit bunch (FFB) suppliers, to include, among other things, the following:</p> <ul style="list-style-type: none"> i. A requirement that supplier commit and adhere to the principles and standards contained in FGV’s Group Sustainability Policy (GSP) and in FGV’s SCOC. ii. A requirement that the supplier undertake to ensure that its own suppliers and those within its supply chain also adhere to the requirements and standards stipulated in FGV’s SCOC and GSP. iii. A requirement that the suppliers disclose, when requested, relevant information to FGV for traceability purposes. iv. A requirement that the suppliers assist FGV in any verification or capacity building exercise within their supply chain. 	<p>8.1.1 FLA received the draft SCOC pending adoption by the FGV’s top management. FLA noted that the current revision is yet to fully aligned with the FLA standards on Hours of Work. Interviews with FGV Core Team (Group Procurement) confirmed that SCOC must be briefed first, and signed by the prospective suppliers before confirming business relationship with the FGV. Every time the suppliers sign a new contract, a briefing session must first be conducted and the suppliers need to sign a new SCOC.</p> <p>8.1.1 Interviews with external stakeholders (FGV’s contractors and recruitment agents) confirmed that they were briefed on the SCOC and signed the SCOC before confirming their contract with FGV.</p> <p>8.1.1 FLA received documentation to confirm that FGV has amended the FFB Purchase Agreement, with the inclusion of supply chain disclosure and access to facilities / growers for independent assessment by the FLA.</p> <p>Sources</p> <ul style="list-style-type: none"> - Document review - Internal Core Team - Interview External Stakeholders (FGV’s contractors and recruitment agencies)

Principle 9: Consultation with Government, Local Authorities & Civil Society – Company affiliate identifies, researches, and engages with relevant local and international non-governmental organizations, trade unions and other civil society organizations (CSO).				
9.1 Consulting stakeholders for development and progress on the action plan				
9.1.1 FGV will consult with a core group of local and international stakeholders to get input and feedback to the (updated) action plans and progress reports	2020 (continuous)	Implemented	9.1.1 Engagement and consultation with external stakeholders are an important aspect of FGV's practices. FGV will continue engaging and consulting with relevant stakeholders where applicable.	9.1.1 FLA confirmed that FGV has been actively engaging external stakeholders throughout the reporting period. FLA reviewed the evidence of its engagement with the external stakeholders. Interview with external stakeholders (IOM, EF, and a local NGO) confirmed that FGV has been engaging the stakeholders through dialogue and consultation in 2020. Sources - Document review - Interview External Stakeholder (local NGOs)
9.2 Undertake stakeholder overview/mapping				
9.2.1 FGV will undertake a mapping of relevant local and international stakeholders and frequently update an overview of these stakeholders, including general information, areas of expertise, relevancy to FGV and contact information. FGV is in the process	2020 (continuous)	Implemented	9.2.1 FGV continuously updates its stakeholder list, which consists of various groups including government agencies, CSOs, business partners, investors, academic institutions and rating agencies.	9.2.1 FLA confirmed receipt of the updated stakeholder database from FGV. A review of the stakeholder database confirmed that it has been updated from the previous version, comprising 29 other industry members; 11 government agencies and statutory bodies; 14 NGOs; 5 local universities; 4 embassies; 29 independent analysts and research institutions; and 11 other organizations. Source - Document review

of engaging with 5 local and 5 international CSOs.				
Principle 10: Verification Requirements – Company affiliate meets FLA verification and program requirements.				
10.1 Creating an internal procedure to manage affiliation with the FLA				
10.1.1 FGV's Sustainability team will be the main liaison with the FLA. They will be responsible for working with other departments to execute the Action Plan. A cross-departmental core team comprising of various departments has been created to execute the action plan. This core-team will develop an internal procedure to manage matters related to its affiliation with the FLA.	2020 (continuous)	Implemented	10.1.1 FGV's Group Sustainability Division (GSD) acts as the main coordinator for the implementation of the action plan. A core team comprising representatives of the relevant departments and divisions within FGV has been established to facilitate the implementation of the action plan.	10.1.1 FLA confirmed that the FGV's Core Team has been established consisting of 15 representatives of relevant departments and divisions to implement and/or coordinate the implementation of the Action Plan. FLA received letters of the appointments signed by FGV Group CEO, confirming the appointment of the Core Team members. Interviews with Core Team (Group Sustainability Division) confirmed that it acts as the coordinator. Sources - Document review - Interview Core Team
10.2 FGV's participation in assessments				

10.2.1 FGV is committed to participate in and provide support to any assessment / due diligence exercises conducted by the FLA, including assessments at owned operations and suppliers' operations.	2020 (continuous)	Implemented	10.2.1 & 10.2.2 FGV is committed to supporting any assessment exercise conducted by the FLA.	10.2.1 & 10.2.2 FGV has provided the necessary support and information to enable an independent assessment and verification of its commitment and activities. Source - Document review
10.2.2 FGV will support the FLA assessment to verify progress against the action plan starting mid-2020.	2020 (continuous)	Implemented		
10.3 Regular reporting to the FLA				
10.3.1 FGV is committed to reporting its progress to implement the FLA's Principles of Fair Labor and Responsible Sourcing for Companies with Agricultural Supply Chains on an annual basis.	2020 (continuous)	Implemented	10.3.1 FGV is committed to submitting progress reports to the FLA.	10.3.1 FGV continues to provide information and report progress in a timely manner. Source - Document review
10.4 Provision of information and other support for assessment and verification				

<p>10.4.1 FGV will provide the necessary information and other support (where needed), including owned operations and suppliers' information to facilitate regular assessment and verification by the FLA.</p>	<p>2020 (continuous)</p>	<p>Implemented</p>	<p>10.4.1 FGV is committed to providing relevant information and supporting documents to facilitate FLA's assessment and verification exercises.</p>	<p>10.4.1 FGV has provided to the FLA the requested information, including estate level information and contacts with its recruitment agencies, contractors and recruitment agencies throughout the validation process.</p> <p>Source - Document review</p>
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Annex 1: Overview of FGV Progress Report Validation Plan

No.	Activities	Dec 20		Jan 21				Feb 21				Mar 21				
		W3	W4	W1	W2	W3	W4	W1	W2	W3	W4	W1	W2	W3	W4	W5
Phase 1: Pre-Validation																
1.1	Introduce validation workplan	21-25														
1.2	Appointment of FLA Assessment Team (3 FLA Staff, 2 Independent Assessors; 1 Translator; and 1 external Research Facilitator)			4-8												
1.3	FGV submits Progress Report on the Action Plan								8							
1.4	FLA Assessment Team completes tools and methodology							1-5	8-12							
Phase 2: Validation Activities																
2.1	FLA Team conducts FGV headquarters level and external stakeholder interviews and documentation review								11-12	15-19	22-26	1-5				
2.2	FLA Team conducts field-level assessment and workers' survey									15-19	22-26	1-5				
2.3	Assessors report validation findings												8-12			
Phase 3: Reporting and Publication																
3.1	FLA staff reviews validation report													15-17		
3.2	FGV reviews & responds to validation report														18-26	
3.3	FLA finalizes the validation report														27-30	
3.4	FLA publishes the report															31

Annex 2: Detailed validation activities

Due to Covid-19 restrictions, all information was gathered virtually.

No.	Stakeholders	2021
Internal Stakeholders (Core Team Members)		
1	Engagement with FGV C-Suite	4 Mar
2	FGV Core Team - Procurement	18 Feb
3	FGV Core Team - Field Workforce Division & OSC	18 Feb
4	FGV Core Team - Trading	19 Feb
5	FGV Core Team - Palm Industry & Plantation Operation	19 Feb
6	FGV Core Team - Human Capital	19 Feb
7	FGV Core Team - Group Governance Risk Management	19 Feb
Internal Stakeholders – Estate 1 and Contractors in Peninsular Malaysia		
8	Estate Management (Opening Meeting)	22 Feb
9	Workers Survey & Interviews	23-24 Feb
10	Estate Management (Closing Meeting)	24 Feb
Internal Stakeholders – Estate 2 and Contractors in Sabah		
11	Estate Management (Opening Meeting)	25 Feb
12	Workers' Survey & Interview	26 Feb – 1 Mar
13	Estate Management (Closing Meeting)	1 Mar
Internal Stakeholders (Core Team Members)		
14	FGV Core Team - Plantation Operation	3 Mar
15	FGV Core Team - Field Workforce Division & OSC	4 Mar
16	FGV Core Team - Procurement	5 Mar
External Stakeholders		
17	Human Rights Commission of Malaysia (SUHAKAM)	11 Feb
18	International Organization for Migration (IOM) and Earthworm Foundation	17 Feb
19	Local NGO (human rights and migrant rights NGO)	1 Mar
20	Procter & Gamble Chemicals (PGC)	4 Mar
21	Contractors 1 & 2 (Estate 1 in Peninsular)	22 Feb
22	Contractors 1 & 2 (Estate 2 in Sabah)	25 Feb
23	Labor recruiter/ recruitment agency 1 (based in Indonesia)	18 Feb
24	Labor recruiter / recruitment agency 2 (based in Bangladesh)	23 Feb
25	In-house union (plantation sector) – Peninsular Malaysia	8 Mar
26	In-house union (plantation sector) - Sabah	8 Mar

Annex 3: Documentation reviewed for validation

Reviewed Documents	Corresponding Action Item	Status of Document
Revised FGV's Supplier Code of Conduct (SCOC) (draft for adoption)	1.1 / 1.2.1(i) / 1.2.1(ii)	Internal
FGV's Group Sustainability Policy (GSP 4.0)		Public
Study on Hours of Work in FGV's Oil Palm Plantation Sector	1.2.2	Internal
Socialization for recruitment agents on updated communication pack; Foreign Labor Recruitment Verification Audit Report	1.3.1(i)	Internal
FGV Action Plan 2020	1.4 / 1.4.1	Public
FGV Statement of Commitment to Uphold Labor Standards and Human Rights	1.4 / 1.4.1	Public
Summary Report of the IOM-Earthworm Foundation to FGV (December 2020)	1.4 / 1.4.1	Internal
FGV's Core Team Information & Management of its Affiliation with FLA	1.4 / 1.4.2	Internal
Copy Pay sheet for workers under regularization program (Sabah)	1.6 / 1.6.1	Internal
Revised FGV's Supplier Code of Conduct (SCOC) (under code element on the prohibition of child labor)	1.7 / 1.7.1	Internal
FGV Group Guidelines and Procedures on Respecting and Protecting the Rights of the Child (draft)	1.7 / 1.7.1	Internal
List and information of In-House Union Representatives	1.8 / 1.8.1	Internal
Gender Committee Consultation Invitation (internal email trail).	1.9 / 1.9.1	Internal
Copy of invitation to a Consultation on the Establishment of FGV's Committee on Gender Equality and Women Empowerment. This includes the distribution list of the Consultation on Gender Committee	1.9 / 1.9.1	Internal
Copy Meeting Minutes of the 46 th Group Management Committee ("GMC") Meeting No. 4/2021	1.9 / 1.9.1	Internal
Copy of the Terms of Refence of the Gender Committee	1.9 / 1.9.1	Internal
Evidence of the appointment of the Core Team Members (managing FLA affiliation)	2.1 / 2.1.1	Internal
NGO's Training Proposal under Human Rights Education for FGV Workers.	2.4 / 2.4.1	Internal
Evidence of socialization for recruitment agents on the updated communication pack	3.1.1	Internal
Evidence of pre-sourcing assessment for recruitment agencies	3.1.2 / 3.1.3	Internal
Copy of training materials (Sessions 1 to 10, dated December 7 th , 2020)	3.2 / 3.2.1	Internal
FGV's Grievance Policy and Grievance Handling Procedure	4.1 / 4.1.1	Internal
Evidence of training record (Sabah)	4.1 / 4.1.1	Internal
Evidence of the FLA-FGV Workshop on Labor Standards Monitoring System 2020	5.1 / 5.1.1	Internal
Copy of concept note of the FGV-SUHAKAM Collaboration on assessment of working and living conditions.	5.3 / 5.3.1	Internal
Evidence of FGV-SUHAKAM engagement in December 2020	5.3 / 5.3.1	Internal
Evidence of the scope of work enhancement of FGV Traceability System (FGV-TOP)	6.1.1	Internal
Progress Update on the Status of Migrant Workers Regularization Program in Sabah	7.1 / 7.1.1 7.1.1 / 7.1.2	Internal
Copy of the Mutual Agreement (<i>Perjanjian Bersama</i>) between migrant workers under regularization and FGV. This includes a copy of the renewed Mutual Agreement	7.1 / 7.1.1 7.1.1 / 7.1.2	Internal
Copy of the Revised FGV Group Guidelines and Procedures for Responsible Recruitment of Migrant Workers	7.1 / 7.1.1 7.1.1 / 7.1.2	Internal
Evidence of FGV's Updated Stakeholder Database	9.2.1	Internal