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OVERVIEW

Glenealy Plantations ("Glenealy") is one of the major palm oil producers in Sarawak, focusing on upstream activities such as plantation and milling operations in the palm oil industry. The management recognises that sustainability forms an essential part of its business and seeks to foster a culture of sustainability throughout the company’s workforce.

Glenealy adopts a balanced approach towards people, planet and prosperity in achieving its corporate visions. In doing so, Glenealy is motivated to undertake sustainable agricultural practices, good corporate governance, high standards of occupational safety, health and welfare for the workforce and actively engage with the local communities within Glenealy’s operating landscape.

**Glenealy Plantations**

In May 2015, Glenealy Plantations (Malaya) Berhad was established as Glenealy Plantations following the privatisation and delisting of the company as part of Glenealy restructuring process in November 2012.

As of 30 June 2020, Glenealy has adopted industry benchmark practices for its planted area of approximately 40,000 hectares out of a total landbank of 51,302 hectares in Malaysia and Indonesia. Glenealy currently operates four palm oil mills across Sabah and Sarawak in Malaysia and one composting plant within the Sabah plantation.

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**GLENEALY PALM OIL PRODUCTION PERFORMANCE FY2019/20**

<table>
<thead>
<tr>
<th>Metric</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fresh Fruit Bunches</td>
<td>511,300 Metric tonnes</td>
</tr>
<tr>
<td>Palm Kernels</td>
<td>19,400 Metric tonnes</td>
</tr>
<tr>
<td>Crude Palm Oil</td>
<td>108,500 Metric tonnes</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Region CPO Vol (Own Mill)</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sarawak</td>
<td>70%</td>
</tr>
<tr>
<td>Sabah</td>
<td>30%</td>
</tr>
</tbody>
</table>
ABOUT THE REPORT

Glenealy is pleased to present its first annual sustainability report which covers the Palm Oil Division’s sustainability performance, achievements and future initiatives.

Our Sustainability Report adheres to the internationally recognised standard for sustainability reporting – Global Reporting Initiative (GRI) Standards: Core option.

The objective of this report is to provide Glenealy stakeholders with an overview of its key Environmental, Social, and Governance (ESG) related initiatives. The scope of this report covers Glenealy operations from 1st January 2020 to 31st December 2020 unless stated otherwise, in which case follows Glenealy financial year. The content of this report was defined by the principles of accuracy, balance, clarity, comparability, reliability, and timeliness.

1. **Stakeholders Inclusiveness**
   - To identify Glenealy’s stakeholders and explain how it has responded to their expectations and interests.

2. **Sustainability Context**
   - To present Glenealy’s performance in the wider context of sustainability.

3. **Materiality**
   - To reflect Glenealy’s significant economic, environmental and social areas of impacts identified by stakeholders.

4. **Completeness**
   - To include coverage of the identified material topics and their boundaries, sufficient to reflect significant economic, environmental and social impacts, and to enable stakeholders to assess Glenealy’s performance.
MESSAGE TO STAKEHOLDERS

Glenealy remains committed to the undertaking of sustainability efforts and programmes.

With this first Sustainability Report, we are pleased to report our efforts to strengthen sustainability as demonstrated by our sustainability policies and measures, our accomplishments during the year and our agenda for the future.

While this Sustainability Report highlights the steady progress we have made, our commitment to sustainability is constantly growing. We plan to update our sustainability agenda continuously to address material issues in economic, environment and social areas.

Where certification initiatives are concerned, we have remained committed to adhering to all regulations mandated by the Government of Malaysia, including Malaysian Sustainable Palm Oil (MSPO) standards.

In Glenealy, we place an important emphasis to consider local communities rights and needs in areas where we operate. Caring for our local community is part of our responsibility, as we provide them timely support in areas such as health, education, financial aid as well as improving infrastructures in villages for improved accessibility.

We engage with local communities to create more meaningful relationships and improve their livelihoods.

Delivering meaningful benefits to our stakeholders while cultivating an economically and environmentally sound business model will shape the way we move Glenealy forward as we look ahead to a sustainable future for all.

Lawrence Chia

Lawrence Chia
Chief Executive Officer (CEO), Glenealy Plantations
OUR APPROACH TO SUSTAINABILITY

We constantly strive to improve our commitments in the areas of human rights and social development, environment and corporate integrity.

Environmental Commitments
Adopt industry best practices and invest in continuous improvement activities in our plantation and milling operations.

Corporate Integrity
Protect ethical standards and further disclose performance objectives and to enhance supply chain traceability.

Human Rights and Social Development
Respect human rights and empower communities by protecting labour standards and further enhance employment conditions.
SUSTAINABILITY AT GLENEALY

KEY MILESTONES AND PERFORMANCE

Planted Area

Oil Mill

LANA
40 tonnes/hour
6,574 ha

SARAWAK

Apr 2018
Developed sustainability related policies for MSPO Certification

Jan–Nov 2019
Certified to MS 2513:2013, MSPO Part 3 for all 17 estates and MSPO Part 4 for all 4 mills

2018

2019
SABAH
LAHAD DATU
45 tonnes/hour
9,898 ha

JELALONG
40 tonnes/hour
12,527 ha

BELAGA
30 tonnes/hour
5,538 ha

PT ABDI & PT TUNAS
45 tonnes/hour
4,910 ha

KALIMANTAN

Jan-Feb 2020
Certified to Supply Chain Certification Standard (SCCS) for all 4 mills

Feb 2020
Establishment of Glenealy Plantations Sustainability Department

Apr 2020
Glenealy Plantations published its No Deforestation, No Peat, No Exploitation (NDPE) Policy

Jun-Oct 2020
Company policies Review and Revision Exercise

Aug 2020
Glenealy Plantations website was established

Sep 2020
Engagement for SPOTT Assessments undertaken

Nov 2020
Revised company policies implemented through training exercise
KEY SUSTAINABILITY INDICATORS

Greenhouse Gases Monitoring Plans FY2019/20
1.12 GHG (tCO2e/t)

Monitoring of Traceability Progress FY2019/20
100% of Fresh Fruit Bunches traceability to plantation level

Supplier Compliance FY2019/20
88% Fresh Fruit Bunches MSPO Certified

482,640 metric tonnes
Fresh Fruit Bunches from MSPO Certified Suppliers FY2019/20

547,558 metric tonnes
Total Fresh Fruit Bunches Processed FY2019/20
VISION AND MISSION STATEMENT

Vision Statement

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

Care for the People and Communities
To focus on Occupational Safety and Health (OSH) efforts, protecting human rights in the workplace, respecting the rights of the indigenous communities and handling conflict & grievance management

Protect the Natural Resources
To care for the environment by committing to no deforestation, protecting peatlands and conservation areas as well as reducing greenhouse gas emissions and harmful wastages

Principles and Values

Aim for Prosperity and Continuous Improvement
To have good agriculture practices and further improve on existing Sustainability, Supply Chain and Food Safety Certifications

Corporate Social Responsibility
To bring positive impact on the environment and operations and be a good corporate responsible citizen to the communities that we are in
SUSTAINABILITY COMMITTEE

Glenealy is committed to being a responsible organisation by embedding sustainability into the organisation’s strategy, operations and business objectives. The Glenealy Plantation Sustainability Committee was formed by the senior management to drive the sustainability agenda across the organisation.
SUSTAINABILITY COMMITMENT

Glenealy is progressing to incorporate sustainability efforts across all its operations through the following initiatives:

- **Adopt industry best practices and invest in continuous improvement activities in our plantation and milling operations**

- **Protect the natural resources, biodiversity and ecosystems through established work practices and operational procedures**

- **Promote transparency by effective communication and consultation with relevant stakeholders**

- **Compliance to all relevant national, state, local laws and regulations**

- **Respect human rights, including the employment conditions and health and safety of workers**

- **Commitment to all sustainability related policies and practices**
SUSTAINABLE PALM OIL POLICY

We are committed to sustainable palm oil production and sourcing. Glenealy introduced sustainability policies that target our operations and interactions with local communities and third-party organisations.

**No Deforestation, No Peat, No Exploitation (NDPE) Policy**

We strive to uphold the principles of NDPE policy throughout our business operations by continuously improving our transparent and responsible sourcing network.

**Respect the Rights of Local Communities**

Open and continuous consultations with local and indigenous communities is a priority in new development areas. No development will proceed without the Free, Prior and Informed Consent (FPIC) of landowners and users with legal rights.

**Inclusion of Smallholders within the Supply Chain**

Glenealy includes smallholders within the supply chain of its palm oil business while improving their livelihoods.

**Natural Resources, Biodiversity and Wildlife Conversation**

Glenealy ensures the protection of rare, threatened, and endangered wildlife species by implementing national and international best practices for biodiversity and wildlife conservation.

**Minimising Chemicals and Pesticides**

Glenealy looks to minimise the use of pesticides and inorganic fertilisers throughout the life cycle of each planting within our operations by practicing good practices on soil management and integrated pest management.

**Waste Management**

In compliance with regulations concerning all types of pollutants and waste generation, we implement appropriate measures to reduce the environmental impact arising from our operational activities.

**Traceability and Accountability**

Glenealy upholds high standards of transparency through traceability reporting. We maintain high standards of accountability by active communication.
OVERVIEW OF POLICIES

Defined policy structure to ensure consistent interpretation and application of sustainability principles by all employees of Glenealy.

Reviewed and enhanced existing policies align with Environmental, Social and Governance (ESG) Standards and to address stakeholders’ concerns.

Conducted comprehensive training programme for our staff on sustainability reporting and subsequently held a customised Train-The-Trainer Session to further drive sustainability integration.
**No Deforestation, No Peat, No Exploitation (NDPE) Policy**

Glenealy recognises the importance of committing to core sustainable values in our palm oil production operations. We will play our role as a responsible grower and miller in the oil palm industry by adhering to:

- Transparency
- No Deforestation
- No Peat
- No Exploitation

We are working closely with other growers, traders, processors, NGOs, end-user companies, financial institutions and other industry stakeholders to protect forests, and human and community rights.

Core to our policy is a commitment to creating a transparent sourcing network with full traceability. We look forward to close consultation with communities, NGOs, our industry partners, and financial institutions to ensure effective implementation of these policies.

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### No Deforestation

- **No development of High Carbon Stock (HCS) Areas**
- **No burning**
- **No development in High Conservation Value (HCV) Areas**

### No Exploitation of People and Local Communities

- Facilitate the inclusion of smallholders into the supply chain
- Resolve complaints and conflicts through an open, transparent and consultative process
- Respect and recognise the rights of workers including contract, temporary and migrant workers
- Free, Prior and Informed Consent (FPIC) from indigenous and local communities on land which they hold legal and communal rights

### Reducing Greenhouse Gases

- Progressively reduce Greenhouse Gas (GHG) emissions on existing plantations
SUSTAINABLE PALM OIL CERTIFICATION

All Glenealy’s estates are legally and responsibly managed. This is evidenced by the fact that all our oil palm operations have obtained the Malaysian Sustainable Palm Oil (MSPO) certification which is a mandatory standard imposed by the Government of Malaysia.

We attained our MSPO certification in 2019. It covers seven aspects of palm oil production from the field to the final product, namely management commitment and responsibility; transparency; compliance and legal requirements; social responsibility, health, safety and employment conditions; environment, natural resources, biodiversity and ecosystem; best practices; and development of new plantings.

MSPO certification covers all aspects of palm oil production, from the field to the final product. It includes general principles as well as stringent criteria for all parties involved in palm oil production, from the independent family farmers who tend the trees which produce the oil-rich fruit to the organisations that assist these smallholders to the palm oil mills which process the oil.
FUTURE OUTLOOK

Glenealy Commits to A More Sustainable Future

The palm oil trade has increased enormously in recent decades. 85% of global production takes place in Malaysia and Indonesia. The industry has played an essential role in the increased economic prosperity of the region and its communities.

Glenealy is concerned about the conservation of natural resources. We will continue to adopt sustainable practices that have a positive impact on biodiversity.

We aim to be a sustainable palm oil producer recognised for our balanced responsibilities towards our communities, natural resources and economic performance.
ENGAGING OUR STAKEHOLDERS

We continue to engage with stakeholders to progress towards sustainable palm oil supply chains and protecting areas of high conservation value.
GLENEALY’S APPROACH TO STAKEHOLDERS ENGAGEMENT

We engage our stakeholders through multiple channels. Our key stakeholder groups identified across the value chain include local communities, employees, financial institutions, suppliers, customers, non-governmental organisations, industry groups, and government agencies.

**GLENEALY 4 STEPS APPROACH**

Our 4 Steps Action Plan is developed to show how we can sustain constructive relationships over time.

**STEP 1 Strategy**

Play a supportive role in establishing a sustainable future for the palm oil industry

**STEP 2 Stakeholder Mapping**

Identify various levels of stakeholders and how they contribute to Glenealy’s overall performance and business objectives

**STEP 3 Engagement**

Conduct external stakeholders engagement surveys to gauge their feedback on critical sustainability issues

**STEP 4 Action Plan**

Identify opportunities from feedback and determine actions, revisit goals and plan next steps for follow up and future engagement
<table>
<thead>
<tr>
<th>Stakeholders Group</th>
<th>Mode of Engagement</th>
<th>Focus Area</th>
<th>Value Creation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Local Communities</strong></td>
<td>&gt; Informal sessions</td>
<td>&gt; Community relations</td>
<td>Engage local communities consistently through formal and informal channels.</td>
</tr>
<tr>
<td></td>
<td>&gt; Community events</td>
<td>&gt; Fair dispute management</td>
<td></td>
</tr>
<tr>
<td></td>
<td>&gt; Community meetings</td>
<td>&gt; Livelihood improvement through Corporate Social Responsibility (CSR)</td>
<td></td>
</tr>
<tr>
<td><strong>Customers</strong></td>
<td>&gt; Email and hotline queries</td>
<td>&gt; Traceability of suppliers products</td>
<td>Establish long-lasting relationships with its customers and invest in ensuring high quality products and services in line with ethical marketing principles.</td>
</tr>
<tr>
<td></td>
<td>&gt; On-site visits</td>
<td>&gt; Visibility of sustainability initiatives</td>
<td></td>
</tr>
<tr>
<td></td>
<td>&gt; Face-to-face meetings</td>
<td>&gt; Leadership commitment</td>
<td></td>
</tr>
<tr>
<td></td>
<td>&gt; Telephone follow-ups</td>
<td>&gt; Sustainability policies</td>
<td></td>
</tr>
<tr>
<td></td>
<td>&gt; Annual review and feedback sessions</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Employees</strong></td>
<td>&gt; Employee appraisals</td>
<td>&gt; Occupational health and safety</td>
<td>Engage employees consistently through formal and informal channels.</td>
</tr>
<tr>
<td></td>
<td>&gt; Informal one-to-one sessions</td>
<td>&gt; Grievance procedures</td>
<td></td>
</tr>
<tr>
<td></td>
<td>&gt; Training</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>NGOs</strong></td>
<td>&gt; Explore potential partnership with suitable NGOs</td>
<td>&gt; Responsible social and environmental management</td>
<td>Adopt and implement sustainability efforts.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; Transparency</td>
<td></td>
</tr>
<tr>
<td><strong>Banks</strong></td>
<td>&gt; Face-to-face meetings</td>
<td>&gt; Sustainability commitments</td>
<td>Form trusting and lasting relationships with financial institutions through transparent reporting.</td>
</tr>
<tr>
<td></td>
<td>&gt; Regular inspections/visits by the financial institutions</td>
<td>&gt; Structured sustainability governance</td>
<td></td>
</tr>
<tr>
<td></td>
<td>&gt; Monthly/yearly reporting</td>
<td>&gt; Improved transparency</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; Good practices in human rights</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; Corporate Social Responsibility (CSR) efforts for environment and community</td>
<td></td>
</tr>
<tr>
<td><strong>Government and Regulators</strong></td>
<td>&gt; Face-to-face meetings</td>
<td>&gt; Regulatory compliance</td>
<td>Achieve full compliance and seek to raise standards of sustainability practices through regular inspections, audits, and frequent reporting.</td>
</tr>
<tr>
<td></td>
<td>&gt; Regular inspections/visits by the agencies</td>
<td>&gt; Sustainability governance</td>
<td></td>
</tr>
<tr>
<td></td>
<td>&gt; Monthly/yearly reporting</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>&gt; Regular audits</td>
<td></td>
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</tbody>
</table>
OUR MATERIALLY ASSESSMENT

These assessments were carried out in a series of surveys with our stakeholders to engage and gather their inputs and expectations.

In 2020, Glenealy conducted a materiality assessment to review the relevance of the existing ESG topics against current business operations with the help of an external consultant. The table below describes the list of ESG topics that are mapped to GRI standards for this year:

<table>
<thead>
<tr>
<th>GRI 307</th>
<th>Environmental Compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>GRI 403</td>
<td>Occupational Safety and Health</td>
</tr>
<tr>
<td>GRI 412</td>
<td>Human Rights Assessment</td>
</tr>
<tr>
<td>GRI 413</td>
<td>Local Communities</td>
</tr>
<tr>
<td>GRI 102</td>
<td>General Disclosure</td>
</tr>
<tr>
<td>GRI 205</td>
<td>Anti-corruption</td>
</tr>
<tr>
<td>GRI 417</td>
<td>Marketing and Labelling</td>
</tr>
</tbody>
</table>

- Environmental compliance
- Employee occupational, safety and well-being
- Protection of human rights
- Protection of local communities
- Leadership transparency and accountability
- Commitment to anti-corruption and anti-bribery practices
- Accountability, openness, transparency and traceability
ADDRESSING OUR STAKEHOLDERS CONCERNS AND CONTRIBUTIONS TO UNITED NATIONS’ SUSTAINABLE DEVELOPMENT GOALS

Glenealy recognises the importance of pursuing initiatives towards the advancement of these goals.

<table>
<thead>
<tr>
<th>Priority Issues</th>
<th>GRI Standards</th>
<th>Summary of Initiatives in Glenealy</th>
<th>UN SDGs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental compliance</td>
<td>GRI 307 Environmental Compliance</td>
<td>&gt; Developed the No Deforestation, No Peat, No Exploitation (NDPE) Policy and compliance to MSPO standards</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; Quality Check systems which evaluate quality of work standards</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; Mill and estate management identify areas to improve compliance</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; Adhering strictly to SOPs and national laws and regulation</td>
<td></td>
</tr>
<tr>
<td>Employee occupational, safety and well-being</td>
<td>GRI 403 Occupational Safety and Health</td>
<td>&gt; Adherence to Occupational Safety and Health (OSH) policies that is tailored to Glenealy operations based on Hazard Identification, Risk Assessment, and Risk Control (HIRARC) 2018 guidelines</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>&gt; Annual training to communicate OSH policies and implementations</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>&gt; Voluntary programmes to promote health awareness and safety at workplace</td>
<td></td>
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<td></td>
<td></td>
<td>&gt; Establishment of estate clinics</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; Safety and Health Committee was established to oversee OSH practices and incidents at mills and plantations</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; OSH representatives at each mill and estate</td>
<td></td>
</tr>
<tr>
<td>Protection of human rights</td>
<td>GRI 412 Human Rights Assessment</td>
<td>&gt; Adherence to human right commitment under Sustainable Palm Oil Policy (SPOP) and NDPE policy</td>
<td>8</td>
</tr>
<tr>
<td>Priority Issues</td>
<td>GRI Standards</td>
<td>Summary of Initiatives in Glenealy</td>
<td>UN SDGs</td>
</tr>
<tr>
<td>---------------------------------------</td>
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<td>---------------------------------------------------------------------------------------------------</td>
<td>---------</td>
</tr>
<tr>
<td>Protection of local communities</td>
<td>GRI 413</td>
<td>&gt; Conflict resolution mechanism to address local communities concerns</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Local Communities</td>
<td>&gt; Continued engagements with Community Representative Committee to manage resources for local communities</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; Plans to formalise Corporate Social Responsibility (CSR) activities based on needs and importance</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; COVID-19 medical support and assistance for the local communities</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; Funding for infrastructure projects including building learning centres, roads and bridges</td>
<td>16</td>
</tr>
<tr>
<td>Leadership transparency and accountability</td>
<td>GRI 102</td>
<td>&gt; Establishment of Sustainability Committee</td>
<td>16</td>
</tr>
<tr>
<td>Commitment to anti-corruption and anti-bribery practices</td>
<td>GRI 205</td>
<td>&gt; Adherence and implementation of revised Anti-Bribery and Anti-Corruption (ABAC) policy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Anti-corruption</td>
<td>&gt; Communication and training on revised Anti-Bribery and Anti-Corruption (ABAC) policy for employees</td>
<td></td>
</tr>
<tr>
<td>Accountability, openness, transparency and traceability</td>
<td>GRI 417</td>
<td>&gt; Launched Glenealy website in August 2020 to improve transparency</td>
<td>16</td>
</tr>
<tr>
<td></td>
<td>Marketing and Labelling</td>
<td>&gt; Adherence to the No Deforestation, No Peat, No Exploitation (NDPE) policy</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; Frequent review of sustainability strategies to ensure transparency</td>
<td></td>
</tr>
</tbody>
</table>

The 2030 Agenda for Sustainable Development, as adopted by all United Nations Member States in 2015, provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 Sustainable Development Goals (SDGs), which is an urgent call for action by all countries – developed and developing – in a global partnership.”

The 17 Goals, United Nations Department of Economic and Social Affairs, sdgs.un.org/goals
COMMITMENT TO THE ENVIRONMENT

“We aim to play our role in promoting positive impact to the environment by assessing and improving our operations.”
CONTRIBUTING TOWARDS POSITIVE ENVIRONMENTAL IMPACT

We are committed to improving our sustainability performance and adhering to industry best practices.

**Sustainability Certifications**

Obtaining relevant industry sustainability certifications help demonstrate our commitment to adopting best practices and standards for responsible production as well as meet the growing market demand for sustainable palm oil.

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**Malaysian Sustainable Palm Oil (MSPO) Certification**

The MSPO Standard is a national certification standard created by the Malaysian government and developed with input from various stakeholders in the palm oil industry. It was first launched in November 2013 and was officially implemented in January 2015. All our plantation and mills are MSPO-certified. The MSPO Certification provides credible, sustainable and responsible management, to bring about positive social, environmental and economic impacts.

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We are committed to the implementation of policies and initiatives that reduce environmental risks wherever possible.

**Fire Management**

We have implemented initiatives to ensure a responsible fire management system in our operations. This is to ensure that we prevent damage to nature and surrounding communities.

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**Environmental Related Activities**

<table>
<thead>
<tr>
<th></th>
<th><strong>Activity</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Riparian zone rehabilitation and restoration programme, establishment of mini nursery for tree planting</td>
</tr>
<tr>
<td>2</td>
<td>High Biodiversity Value (HBV) area identification and standardised signage installation</td>
</tr>
<tr>
<td>3</td>
<td>River riparian zone identification and standardised signage installation</td>
</tr>
<tr>
<td>4</td>
<td>Biodiversity assessment through camera trapping</td>
</tr>
<tr>
<td>5</td>
<td>Biodiversity habitat enhancement through indigenous trees species and native fruit trees planting</td>
</tr>
</tbody>
</table>
ENSURING ENVIRONMENTAL COMPLIANCE

Environmental compliance and workplace safety are essential to the way we operate. Glenealy complies with relevant regulations and strives to maintain a safe working environment for our employees. Glenealy operations are subject to extensive federal, state and local environmental laws and regulations. These requirements relate to a broad range of activities, including preventing the discharge of pollutants, safely transporting, handling and storing hazardous materials, properly managing hazardous wastes, protecting threatened and endangered species, and reporting and reducing emissions of air pollutants and Greenhouse Gases (GHGs).

Scheduled waste management as per Environmental Quality (Scheduled Wastes) Regulations 2005

Disposing of used tyres to approved licensed contractors for recycling. Part of the Dengue eradication activities in the State of Sarawak.

The establishment of composting plant at Timora Palm Oil Mill (Sabah) which commenced its operation from 1st January 2020 is part of Glenealy Plantations effort to reduce POME’s BOD level before discharging into the water course.

Promoting recycle waste programme such as recyclable plastics and can among plantation personnel.
TOTAL RECYCLABLE WASTE DISPOSED BY CONTRACTOR

<table>
<thead>
<tr>
<th>Item</th>
<th>FY2018/19</th>
<th>FY2019/20</th>
</tr>
</thead>
<tbody>
<tr>
<td>Used Tyre (pcs)</td>
<td>1291</td>
<td></td>
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<tr>
<td>Recyclable Plastics Bottle</td>
<td>768</td>
<td>804</td>
</tr>
<tr>
<td>and Container (kg)</td>
<td>FY2019/20</td>
<td>FY2018/19</td>
</tr>
<tr>
<td>Recyclable Can (kg)</td>
<td>157</td>
<td>300</td>
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<tr>
<td></td>
<td>FY2018/19</td>
<td>FY2019/20</td>
</tr>
</tbody>
</table>
BEST PRACTICES AND CONTINUOUS IMPROVEMENT

Glenealy enhances its productivity and product quality by adopting industry standards for agriculture and milling management practices. The company has always engaged in innovative activities as an ongoing effort to improve all elements of the organisation. We believe that a steady stream of improvements, diligently executed, will have transformational results.

Good Agriculture Practices

**Soil Management**

Glenealy implements industry best management practices in soil management to improve soil fertility, reduce soil erosion and address pollution management. This is governed by Glenealy’s Oil Palm Standard Operation Manual dated August 2017.

**Integrated Pest Management (IPM)**

Glenealy practices IPM, which is the usage of compatible methods of pests and diseases control that include ecological, physical, biological and chemical controls. These practises have significantly reduced the use of chemical pesticides and negative environmental impacts.

**Supply Chain Certification**

All the 4 palm oil mills in Malaysia under Glenealy Plantations obtained the Malaysian Sustainable Palm Oil Supply Chain Certification Standard (MSPO SCCS) starting January 2020.
OUR PEOPLE

PROMISING A HEALTHY AND SAFE WORKING ENVIRONMENT

We are committed to providing a safe working environment for all our employees and promoting a healthy lifestyle.

Glenealy’s approach to Occupational, Health and Safety is governed by a management framework. This framework covers hazard identification, risk assessment and risk control processes. The various aspects are audited regularly to ensure compliance to local laws.

As we believe that maintaining high health and safety standards is a shared responsibility, we actively engage employees across all levels and locations. Each estate and mill has its own localised Safety and Health Committee comprised of management level personnel and employees representatives to ensure the safety and health for the estates’ and mills’ employees. The Committee is responsible to organize safety and health programmes to improve awareness, job competency and to promote of healthy lifestyle.

Occupational Safety and Health (OSH) Coordinator Training

A three-day competency training programme recognised by Department of Occupational Safety of Health (DOSH) Malaysia was organised in January 2020. A total of 31 employees who were selected from various plantations and mills to attend the training. The trained OSH Coordinator was responsible for overseeing and implementing OSH initiatives in the workplace.

The training focused on the following areas:

- Reality of Small and Medium Industries in Malaysia
- Introduction to Role and Function of the Occupational Safety and Health Department, and related Occupational Safety and Health (OSH) legislation
- Basic Management of Occupational Safety and Health (OSH) SMIs
- Chemical Management
- Introduction to Occupational Diseases

> Hazard Identification, Risk Assessment and Risk Control, Practical Exercise on HIRARC
> Material Storage and Handling
> Work Station Design and Lighting
> Productive Machine Safety
> Premises and Work-related Facilities
Child Care Training

A one-day childcare training programme was carried out by a Health Medical Officer and a Community Nurse from the nearby district hospital. This programme was organised with the objective of educating workers exposed to child-care responsibilities within plantations on child-care knowledge.

Training topics include:

- Hygienic practice in the Community Learning Centre (CLC) and Creche;
- the prevention of infectious disease;
- nutrition and breastfeeding;
- first aid concept;
- wound management;
- choking; and
- diarrhea and vomiting.

First Aider Training

Conducted in 2018 and 2019, a two-day First-Aider programme was organised for selected workers from various divisions.
Chemical Safety

Chemical health risk assessments, health and medical surveillance programmes are carried out to ensure that risks remain low and within the standards of practice.

Other Safety and Health related training topics

- Chemical Safe Handling Training
- Sharp Tools Training
- Safe Operation (SOP) training for Harvesting, Manuring and Spraying
- Risk of Slip, Trip and Fall Training
- Fire Extinguisher Training
- Emergency Response Training
- Tractor Safety Training
- Workshop Safety Training
RESPECTING DIVERSITY 
AND SOCIAL RIGHTS

We recognise that employee diversity and inclusion are sources of competitiveness for Glenealy. We place great importance in establishing a workplace where employees can demonstrate their potential to the fullest.

By having employees from a range of backgrounds, we are able to share ideas from different perspectives and create new business concepts which produces better business results. This meets the diverse needs of customers around the world and enables us to provide quality products and services. By making diversity and inclusion a pillar within our corporate strategy, we strive to continue promoting such values throughout our business practices.

Senior manager, manager, executive and staffs attend training conducted by labour department on the topic “Employer R&R on Sarawak Labour Ordinance Compliance”

Periodic dialogue session between employers and employees to improve the employment condition, social care and the well-being of the plantation workers

Labour department conducting annual random audit on the Sarawak Labour Ordinance compliance

Stakeholders “Meet the Locals” session to allow local communities to address their concern/requests and resolve the issue together

Full employees COVID-19 screening test at all our complexes and the results were all negative
**SUPPORTING OUR LOCAL COMMUNITY – COMMUNITY ENGAGEMENT**

We conduct social impact assessments in all new plantation areas that we plan to develop. The results of these assessments guide us in our engagement with communities and our planning and implementation of programmes to help mitigate the negative changes that may result from our operations.

Estate management present the food aid to nearby local communities during the flood session.

Roads and bridge repair works conducted by Glenealy for the roads connecting to Rumah Aban in Jelalong Estates.

Estate Management conducted fogging activities at nearby village to prevent spread of malaria or dengue.
GLENEALY GIVES BACK
LOCAL COMMUNITY ASSISTANCE

The company’s Corporate Social Responsibility (CSR) programme can be seen in many forms of initiatives and the most common are contributions to the local communities such as assistance provided during disasters, medical help, education, sponsoring local events and providing maintenance for local infrastructures.

TOGETHER, OUR BONDS ARE STRONGER

Timora Palm Oil Mill in Sabah held a blood donation drive in collaboration with the Lahad Datu Hospital in Sabah on 25th June, 2020 where 46 bags of blood were collected from the donors. The management of Timora Palm Oil Mill presented a souvenir to the medical team from Lahad Datu Hospital which facilitated the blood donation drive as a token of appreciation.

A SEA OF HOPE

During the Movement Control Order period to contain the Covid-19 pandemic in Sabah, the management of Timora Palm Oil Mill in Sabah took the initiative to organise a campaign to supply fish at no cost to each worker’s household. The initiative was undertaken to lessen the difficulties faced by these households to get enough food supply and the campaign was well-received and much appreciated by the workers.
BACK TO SCHOOL
Since 2014, Glenealy’s employees have been donating hampers, school uniforms, bags, shoes, etc., during Christmas and school opening sessions to Long Bala Communities.

LIFE LESSON OF LOVE
In May 2018, Glenealy started an initiative to set up Community Learning Centres (CLC) for children of the Indonesian workers in its three plantations in Sarawak. The CLCs were to cater to Indonesian children aged from 7 to 12 years old by providing them with basic education in line with the Indonesian education syllabus.

ALL ROADS LEAD TO HOPE
As a responsible company, Glenealy endeavours to provide assistance to the communities around our operations when required. The company assisted the local communities to repair the roads at Rh. Jeranding and Rh. Awan near Jelalong plantation.
OUR RESPONSE TO COVID-19

Ensuring the safety of our employees and responding to the needs of our surrounding communities are two key priorities we sought to address amidst the ongoing pandemic.

As COVID-19 has affected all areas of business throughout the world this year, the importance of accountability and corporate social responsibility comes to the fore.

Glenealy’s 2020 Corporate Social Responsibility (CSR) efforts emphasises that the company’s immediate priority was protecting the health and safety of employees. Right from the outbreak of COVID-19, a dedicated team was set up to monitor developments and respond as needed.

Medical Assistance

- **Donated 80,000 surgical masks, 1,000 protective bodysuits, 50 thermometers, and 50 bottles of 500ml disinfectants** to Sabah’s Tawau Hospital to help combat the spread of the novel coronavirus or COVID-19.

- **Donated 60,000 surgical masks, 500 protective bodysuits, 15 thermometers, and 50 bottles of 500ml sanitisers** to the Lahad Datu Hospital.

- Distributed mask supplies to a total of **12 government agencies**, including Tatau community.

- **Donated 500,000 masks** to the Ministry of Home Affairs to show their solidarity to the government in combating COVID-19.

- **Donated 6,200 packets** of essential food packs to the villages in and around our plantation areas in Tatau, Lana and Kakus area.

- **Donated two Polymerase Chain Reaction (PCR) machines**, i.e. one unit PCR Biorad CFX 96 machine and the second unit — gene expert 4 cartridges, 1 autoclave steriliser, 1 RNA extractor, and 2 invasive ventilators to the Sarawak General Hospital today to support its fight against the COVID-19 outbreak.
LEARNING TO LOVE COMMUNITY

To ensure children have access to basic education, Glenealy established CLCs in premises for the children of the plantation workers. A total of 315 students benefited from the programmes from 2019 to 2020.

WRAPPED WITH LOVE

Personal Protective Equipment (PPE) donation to Hospital Tawau and Hospital Lahad Datu, Sabah during COVID-19 pandemic.

TO LASTING RELATIONSHIPS

In 2020, Glenealy has engaged local communities in Jelalong as part of dispute resolution initiatives.

ECONOMIC EMPOWERMENT

In 2020, Glenealy’s plantation projects has created career opportunities, which have improved the overall socio-economic status of the local communities.
OUR GOVERNANCE

CORPORATE VALUES

Excellence
We strive to deliver best-in-class value to our stakeholders through excellence in management practices.

Sustainability
We believe in creating quality products while managing our natural resources sustainably.

Integrity
We are guided by strong corporate governance and ethics to build a foundation of trust, honesty and reliability.

Collaboration
We commit to engaging our local communities and stakeholders to promote economic empowerment for all.
CODE OF ETHICS

The Code requires employees and contractors to comply with applicable laws and regulations, and with all Glenealy’s policies and standards.

Health and Safety Policy
Our company is committed to ensure a safe and healthy working environment for all our employees in our daily operations. Employees across all levels consider safety as a joint responsibility.

Anti-Harassment and Anti-Discrimination Policy
This policy seeks to ensure that all staff of Glenealy feel safe, respected, and fully valued as they contribute to the company. We will address instances of discrimination or harassment between and against staff to prevent, correct, and discipline behaviours that violate this policy.

Gifts and Entertainment Policy
Employees and directors may only give or accept gifts if specific conditions are met. Any gift which violates the terms of any applicable policy of the company must be declined/returned with polite explanations of all applicable policies of the company.

Human Rights Policy
We are committed to ensure that the well-being and rights of all our employees, contractors and local communities are well taken care of. We remain compliant to the laws and regulations when it comes to dealing with human rights.

Whistleblower Policy
The policy provides safe avenues for employees to make disclosures of alleged improper conduct to the relevant parties of the company in good faith.

Anti-Bribery & Anti-Corruption Policy
Glenealy is committed to conducting business dealings with integrity and avoiding practices of bribery and corruption of all forms in all daily operations. Glenealy’s policy is to conduct all of our businesses in an honest and ethical manner.
GRIEVANCE MECHANISM

Our employees are at the heart of everything that we do. When a conflict or a dispute arises, we handle it with due sensitivity, by means of internal dispute resolution where our employee may have his or her grievances addressed.

GLENEALY’S GRIEVANCE PROCEDURE

Received Grievances/Requests
Grievances/Requests can be raised by stakeholders via following option:
1. Completed the Grievances/Requests Form
2. Email: info@glenealyplantations.com.my
3. Writing: Glenealy Plantations, P.O Box 12053, 50766 Kuala Lumpur

Review and Validation of Grievances/Requests
To validate the received/reported case.

Valid? (Yes) →

Preliminary Dialogues and Investigation
Head of Operation Unit to proceed with dialogue and investigation via complainant engagement on the reported case.

Valid? (No) →

Complainant Notification
Outcome of the resolution to be documented and stakeholders/complainant to be informed.

Resolved? (Yes) →

Monitoring on Implementation Plan
Progress on implementation plan to be reviewed/monitored and stakeholders/complainant to be informed on the current state until resolution.

Resolved? (No) →

Secondary Dialogues and Investigations
Head of Operation Unit report the case to Grievance Management Committee (GMC).
The case to be handled over to relevant parties/personnel (if required).
Review and initiate a dialogue with complainant (may involve third-party if required).
Continue attempt to resolve the grievances/requests.

Inform Complainant
Inform complainant on the invalid grievances.

Legal Advice
If the matter is not resolved to the mutual satisfaction of the complaint and the company, the grievances shall be referred to independent technical/legal adviser.
INFORMATION AND TECHNOLOGY

Glenealy keeps its focus on the rising importance of technologies for communications, knowledge, and capacity building in our bid for sustainable development.

**Website Development**

The introduction of the www.glenealyplantations.com.my domain and development of a new and fresh website was done with the objective to provide our customers, suppliers, employees, and other stakeholders with convenient and seamless approach to knowing all relevant information about Glenealy Plantations.

**Communications Infrastructure**

Various communications technologies were deployed to bridge the Information Technology gap at rural sites where the OP estates and mills are situated. These communication channels allow for efficient and effective use of other I.T tools like Drones for plantation management, mapping, planning and support.

**Privacy Policy**

By using our websites, applications or by otherwise giving Glenealy access to Personal Data, users are accepting the practices described in our Privacy Policy.

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The trial introduction of e-wallet for the estate workers is also being initiated, to allow workers to have a more personal, authenticated, simplified and convenient solution to manage their funds via transfers to their families and for payment of goods at canteens.
# GRI CONTENT INDEX

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<td>No Significant changes</td>
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<td>Our People, page 31</td>
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<td>102-13</td>
<td>Membership of associations</td>
<td>Glenealy Plantations Sdn Bhd subsidiary is a member of “Malaysia Palm Oil Association” and “Sarawak Oil Palm Plantation Owners Association”</td>
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<td><strong>STRATEGY</strong></td>
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<td>Values, principles, standards, and norms of behaviour</td>
<td>Our Approach to Sustainability, page 6 to 11</td>
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<td>Glenealy’s Stakeholders Engagement Overview, page 19-24</td>
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<td>Collective bargaining agreements</td>
<td>Not applicable</td>
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<td>102-44</td>
<td>Key topics and concerns raised</td>
<td>Glenealy’s Stakeholders Engagement Overview, page 19-24</td>
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**REPORTING PRACTICE**

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<td>102-45</td>
<td>Entities included in the consolidated financial statements</td>
<td>Glenealy Plantations Sdn Bhd - Audited Financial Statement 2020/21</td>
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<td>Defining report content and topic boundaries</td>
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<td>Not Applicable</td>
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<td>102-56</td>
<td>External assurance</td>
<td>This report is not externally assured.</td>
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<tr>
<td><strong>GRI 307: Environmental Compliance</strong></td>
<td>Descriptions of any significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations.</td>
<td>No significant fines or non-monetary sanctions are reported. A description of how Glenealy Plantations manages this aspect is explained from page 25 to 29.</td>
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<tr>
<td><strong>GRI 403: Occupational Health and Safety</strong></td>
<td>Descriptions of how occupational health and safety (OHS) is managed including system, risk management, training, prevention and mitigation, injury rate.</td>
<td>Injury rate is reported at 1.25 per 200,000 hours worked (4,309 employees as at financial year). Description of how Glenealy Plantations manages its OHS is given from page 31 to 33.</td>
</tr>
<tr>
<td><strong>GRI 412: Human Rights Assessment</strong></td>
<td>Descriptions of human rights aspects are managed with operations including assessments and policy training.</td>
<td>Human rights aspects are managed in line with Sustainable Palm Oil Policy and NDPE policy. More description on page 16 and 34.</td>
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<tr>
<td><strong>GRI 413: Local Communities</strong></td>
<td>Descriptions on any local communities engagement, impact assessments and development programmes.</td>
<td>Our People, page 34-39</td>
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<tr>
<td><strong>GRI 205: Anti-Corruption</strong></td>
<td>Description on how anti-corruption aspects are managed including risk assessments, policies, training and number of incidents reported.</td>
<td>No incidents reported related to anti-corruption. More description on page 30 and 41.</td>
</tr>
<tr>
<td><strong>GRI 417: Marketing and Labelling</strong></td>
<td>Description on how this aspect is managed, including sourcing and compliance.</td>
<td>Adherence to NDPE policy and supply chain traceability. More description on page 6, 12, 14, 16, 21 and 41.</td>
</tr>
</tbody>
</table>
Contact Us
For questions or to deliver feedback about this report, please contact:

Glenealy Plantations
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Tel: +603 6412 3999
Email: info@glenealyplantations.com.my