

**RSPO PRINCIPLE AND CRITERIA –
2nd ANNUAL SURVEILLANCE ASSESSMENT (ASA2_2)
Public Summary Report**

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|--|
| Client Company name (Parent Company): United Plantations Berhad |
| Client company Address: Jendarata Estate 36009 Teluk Intan Perak, Malaysia |
| Certification Unit: Jendarata Palm Oil Mill Location of certification unit: Jendarata Estate 36009 Teluk Intan Perak, Malaysia |

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Section 1: Scope of the Certification Assessment

| 1. Company Details | | | |
|---|--|---------------------------------|--|
| RSPO Membership Number | 1-0004-04-000-00 | Membership Approval Date | 19/07/2004 |
| Parent Company Name | United Plantations Berhad | | |
| Address | Jendarata Estate 36009 Teluk Intan, Perak, Malaysia | | |
| Subsidiary (Certification Unit Name) | Jendarata Palm Oil Mill | | |
| Address | Jendarata POM, 36009 Teluk Intan, Perak, Malaysia | | |
| Contact Name | Mr C Mathews | | |
| Website | www.unitedplantations.com | E-mail | www.unitedplantations.com |
| Telephone | +605 6411411 | Facsimile | +605 6411411 |

| 2. Certification Information | | | |
|-------------------------------|--|------------------------------------|------------|
| Certificate Number | RSPO 693200 | Date of First Certification | 21/08/2008 |
| | | Certificate Start Date | 29/09/2017 |
| | | Certificate Expiry Date | 28/09/2022 |
| Scope of Certification | Palm oil and Palm Kernel Production | | |
| Applicable Standards | RSPO P&C MYNI 2014 ; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module D) | | |

| 3. Other Certifications | | | |
|---------------------------|------------------------|-------------------------------|--------------------|
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date |
| MSPO 693201 & 693204 | MSPO Part 3 and Part 4 | BSI Services Malaysia Sdn Bhd | 06/09/2023 |
| RSPO 683611 | RSPO NEXT Guidance | BSI Services Malaysia Sdn Bhd | 28/09/2022 |

| 4. Location(s) of Mill & Supply Bases | | | |
|---------------------------------------|--|------------------------|-------------------|
| Name (Mill / Supply Base) | Location [Map Reference #] | GPS Coordinates | |
| | | Latitude | Longitude |
| Jendarata Palm Oil Mill | 36009 Teluk Intan, Perak, Malaysia | 3° 51' 14" N | 100° 58' 06" E |
| Jendarata Estate | 36009 Teluk Intan, Perak, Malaysia | 3° 54' 00" N | 100° 58' 39" E |
| Seri Pelangi Estate | Batu 11 ¾ Jalan Bidor 36009 Teluk Intan, Perak | 3° 59' 37.35" N | 101° 09' 34.40' E |

| 5. Description of Supply Base | | | | | |
|--------------------------------------|---|---------------------|--|----------------------------|-------------------------|
| Estate | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
| Jendarata Estate | 5,286.00 | 3.15 | 1,046.49 | 6,335.64 | 83.40 |
| Seri Pelangi Estate | 1,337.00 | 0 | 85.00 | 1,422.00 | 94.02 |
| Total | 6,623.00 | 3.15 | *1,131.49 | 7,757.64 | 85.37 |

* Increase in hactarage for other due to coconut area and other crop (701.32ha) and self declared conservation area in HCV area(2.06ha at Seri Pelangi Estate and 5.48ha at Jendarata Estate)

| 6. Plantings & Cycle | | | | | | | |
|---------------------------------|--------------------|---------------|----------------|----------------|----------------|-----------------|-----------------|
| Estate | Age (Years) | | | | | Mature** | Immature |
| | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 | | |
| Jendarata Estate | 1,401.42 | 2,429.72 | 1,360.76 | 89.80 | 4.30 | 3,884.68 | 1,401.32 |
| Seri Pelangi Estate | 321.00 | 0 | 487.00 | 529.00 | 0 | 1,016.00 | 321.00 |
| Total (ha) | 1,722.42 | 2,429.72 | 1,847.76 | 618.80 | 4.30 | 4,900.68 | 1,722.32 |

| 7. Certified Tonnage of FFB (Own Certified Scope) | | | |
|--|--|--------------------------------------|--|
| Estate | Tonnage / year | | |
| | Estimated (Sept 18 - Sept 19) | Actual (June 18 – May 19) | Forecast (Oct 19 – Sept 20) |
| Jendarata Estate | 116,300.00 | 106,589.75 | 114,600 |
| Seri Pelangi Estate | 26,360.00 | 30,085.43 | 32,446 |
| Total | 142,660.00 | 136,675.18 | 147,046 |

| 8. Certified Tonnage of FFB (from other certified unit(s)) if applicable * | | | |
|---|--|--------------------------------------|--|
| Estate | Tonnage / year | | |
| | Estimated (Sept 18 - Sept 19) | Actual (June 18 – May 19) | Forecast (Oct 19 – Sept 20) |
| | N/A | | N/A |
| | | | |
| Total | | | |

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| 9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable | | | |
|---|----------------------------------|------------------------------|--------------------------------|
| Independent FFB Supplier | Tonnage / year | | |
| | Estimated (Sept 18 - Sept 19) | Actual (June 18 – May 19) | Forecast (Oct 19 – Sept 20) |
| N/A | | | |

| 10. Certified Tonnage | | | |
|--|----------------------------------|------------------------------|--------------------------------|
| Mill Capacity: 50 MT/hr SCC Model: IP | Estimated (Sept 18 - Sept 19) | Actual (June 18 – May 19) | Forecast (Oct 19 – Sept 20) |
| | FFB | FFB | FFB |
| | 142,660.00 | 136,675.18 | 147,046.00 |
| | CPO (OER: 22.82%) | CPO (OER: 22.49%) | CPO (OER: 22.68%) |
| | 32,550.01 | 30,747.80 | 33,350.03 |
| | PK (KER: 5.23%) | PK (KER: 5.19%) | PK (KER: 5.17%) |
| 7,461.12 | 7,095.90 | 7,602.28 | |

| 11. Actual Sold Volume (CPO) | | | | | |
|-------------------------------------|----------------|-------------------------|-----|--------------|-----------|
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | RSB | | |
| CPO (MT) | 17,729.94 | - | - | 3,209.91 | 20,939.85 |

| 12. Actual Sold Volume (PK) | | | | | |
|------------------------------------|----------------|-------------------------|-----|--------------|----------|
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | RSB | | |
| PK (MT) | 4,291.97 | - | - | - | 4,291.97 |

| 13. Actual Group certification Claims | | |
|--|--------|----------------------|
| | Credit | Physical Volume (MT) |
| IS-CSPO | | |
| IS-CSPKO | | |
| IS-CSPKE | | |

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site surveillance assessment was conducted from 17-20/06/2019. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates (Jendarata Estate and Seri Pelangi Estate). A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The audit programmes are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2013 (*MYNI-2014*) and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between

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the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

The following table would be used to identify the locations to be audited each year in the 5 year cycle

| Assessment Program | | | | | |
|--------------------------------------|-----------------------------------|---------------------------|---------------------------|---------------------------|---------------------------|
| Name (Mill / Supply Base) | Year 1 (Certification) | Year 2 (ASA 1) | Year 3 (ASA 2) | Year 4 (ASA 4) | Year 5 (ASA 5) |
| Jendarata Palm Oil Mill | √ | √ | √ | √ | √ |
| Jendarata Estate | √ | √ | √ | √ | √ |
| Seri Pelangi Estate | √ | √ | √ | √ | √ |

Tentative Date of Next Visit: June 15, 2020 – June 18, 2020

Total No. of Mandays: 10 mandays

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2.2 BSI Assessment Team:

| Team Member Name | Role <i>(Team Leader or Team member)</i> | Qualifications <i>(Short description of the team members)</i> |
|---------------------------|--|--|
| Mohd Hafiz Mat Hussain | Lead auditor | He holds Bachelor Degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2014, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2016. He had been involved in ISO9001, ISO14001 and OHSAS 18001 auditing since May 2013 within Malaysia, Brunei, Indonesia and RSPO auditing within Malaysia, Papua New Guinea, Solomon Islands, Gabon and Liberia. During this assessment, he assessed on the aspects of legal, mill best practices, SCC for CPO mill, estate best practices, safety and health, environmental and workers and stakeholders consultation. |
| Elzy Ovktafia | Team member | She graduated from Universiti Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters and currently in the midst of completing the AISP level (professional certificate and recognition from the Incorporated Society of Planters). She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Audit for Social Compliance Programme (URSA, ETI, etc) for 2 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for almost 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During this assessment, he assessed on the aspects of legal, SCC for CPO mill, Social and workers and stakeholders consultation. |
| Muhamad Naquiuddin Mazeli | Team member | He hold Bachelor of Science Horticulture at University Putra Malaysia. He has 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company. He is a trained as Safety and Health Officer, Food Safety System (FSSC and ISO 22000) for Mill and refineries, ISO 9001, ISO 45001 and already attend HCV training with Proforest. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, |

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| | | |
|--|--|--|
| | | safety and health, environmental and workers and stakeholders consultation. He is fluent in Bahasa Malaysia and English languages. |
|--|--|--|

Accompanying Persons:

| No. | Name | Role |
|-----|------------------------------|------------------------------|
| 1 | Mohamed Hidhir Zainal Abidin | Qualifying reviewer/observer |

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

| Date | Time | Subjects | MHM | MN | EO |
|--|-------------|---|--------------------------|----|----|
| Monday, 17/6/19 Jendarata POM | 08:30-09:00 | Opening Meeting at Jendarata POM: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). Verification on previous audit findings | √ | √ | √ |
| | 09:00-13:00 | Jendarata POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. | √ | √ | √ |
| | 09:00–12:00 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | - | - | √ |
| | 13:00-14:00 | LUNCH | | | |
| | 14:00–16:30 | Jendarata POM Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. | √ | √ | √ |
| | 16:30 | Interim Closing Briefing | √ | √ | √ |
| Tuesday, 18/6/19 Jendarata Estate | 08:30–13:00 | Jendarata Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc. | √ | √ | √ |
| | 09:00–12:00 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | - | - | √ |
| | 13:00-14:00 | BREAK | | | |
| | 14:00–16:30 | Jendarata Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc). | √ | √ | √ |
| | | 16:30 | Interim Closing Briefing | √ | √ |

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| Date | Time | Subjects | MHM | MN | EO |
|---|-------------|--|-----|----|----|
| Wednesday, 19/6/19 Seri Pelangi Estate | 09:00-13:00 | Seri Pelangi Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc. | √ | √ | √ |
| | 09:00-12:00 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | - | - | √ |
| | 13:00-14:00 | LUNCH | | | |
| | 14:00-16:30 | Seri Pelangi Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc). | √ | √ | √ |
| | 16:30 | Interim Closing Briefing | √ | √ | √ |
| Thursday, 20/6/19 Jendarata POM | 08:30-09:30 | RSPO Supply Chain for Jendarata POM General Chain of custody: Element 5.1 – 5.13 | √ | √ | √ |
| | 09:30-10:30 | RSPO Supply Chain for Jendarata POM CPO Mill Supply Chain Assessment Report (Module D - CPO Mills: <i>Identity Preserved</i>) | √ | √ | √ |
| | 10:30-11:30 | Verify any outstanding issues & Preparation for closing meeting | √ | √ | √ |
| | 11:30-12:30 | Closing meeting | √ | √ | √ |

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- United Plantations Berhad Multiple Management Units / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

3.2 Time Bound Plan progress for multiple management units

| Time Bound Plan | | |
|--|---|------------|
| Requirement | Remarks | Compliance |
| Summary of the Time Bound Plan | | |
| Does the plan include all subsidiaries, estates and mills? | PT. Surya Sawit Sejati is a subsidiary company of United Plantations Berhad. PT Surya Sawit Sejati have operate 1palm oil mill that supplied by 2 core estate (Lada estate and Runtu estate) and 1 scheme smallholders estate (Plasma Kumai and Arut). | Yes |
| Have all the estates and mills certified within five years after obtaining RSPO membership? | The RSPO Initial Assessment has been carried out on 11-15 th December 2017 on initial HGU areas and have successfully obtained RSPO certificate in November 2018. | Yes |
| Is the time bound plan challenging? <ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. | <ul style="list-style-type: none"> • The time bound plan is challenging as the issuance of HGU is beyond UP Plantation control. • PT Surya Sawit Sejati (PT SSS) is located in Pangkalan Bun, Kotawaringin Barat District, Central Kalimantan Province and was purchased by this company (United Plantations Berhad) early 2007. • 1 palm oil mill that supplied by 2 core estate (Lada estate and Runtu estate) and 1 scheme smallholders estate (Plasma Kumai and Arut). • Infrastructure such as staff and workers quarters, house of worship, sports, kindergarten, creche and medical facilities are provided in the estate. | Yes |

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| | | |
|--|--|-----|
| | Personnel in charge to manage the legal documentation system are Legal Department (Led by Ibu Dewi). A system used for tracking any changes in laws and regulations was set-up through procedure No: SOP-HRD-017-R00. | |
| Have there been any changes since the last audit? Are they justified? | No changes since the last audit | Yes |
| If there have been changes, what circumstances have occurred? | N/A | N/A |
| Have there been any stakeholder comments? | There is no comments from stakeholders. The company has a complaint and grievance mechanism regulated in stakeholder communication and consultation (SOP-HRD-07-R00) and land conflict procedure (SOP : SSS-COMDEV(HMS)-024). | Yes |
| Have there been any newly acquired subsidiaries? | No | Yes |
| If yes, have the newly acquisitions certified within a three-year timeframe? | N/A | N/A |
| Have there been any isolated lapses in implementation of the plan? | No | Yes |
| Un-Certified Units or Holdings | | |
| Did the company conduct an internal audit? If so, has a positive assurance statement been produced? | PT. Surya Sawit Sejati has conducted internal audit for legal compliance and explained the process for evaluate the compliance of regulation. | Yes |
| No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> Primary forest. Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. | The company has identified HCV area for Lada Estate and Runtu Estate in 2008. However, the identification result is not considered sufficient by the company since there is no information on the hectare of HCV area and the location of the identified HCV. Therefore, the company re-identify the HCV area and delineate the HCV area based on HCV identification 2006. The delineation is conducted by Biodiversity Team of the company. Based on the delineation of HCV area there is HCV area that is opened by the company. The company has sent the disclosure of liability and currently has entered to the third stage of RACP process. In 2014, the company has also conducted HCV identification for smallholder scheme area and Kumai Arut Conservation Area for the area of | Yes |

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| | | |
|--|--|------------|
| | <p>1,121.2 ha. However, the area of 49.572 ha is highly potential be opened as housing area of Benaning Bawah Villagers. The information is based on community aspiration to exclude the area from HCV area of Kumai Arut Estate Scheme Smallholder. The company with assigned consultant has approached and counselled local community through FPIC method. The company has consulted to RSPO Jakarta Office on 9 May 2016 in accordance with this situation for RSPO to accommodate community aspiration without disobey RSPO requirement on new area development.</p> | |
| <p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p> | <p>The company has identified HCV area for Lada Estate and Runtu Estate in 2008. However, the identification result is not considered sufficient by the company since there is no information on the hectare of HCV area and the location of the identified HCV. Therefore, the company re-identify the HCV area and delineate the HCV area based on HCV identification 2006. The delineation is conducted by Biodiversity Team of the company. Based on the delineation of HCV area there is HCV area that is opened by the company. The company has sent the disclosure of liability and currently has entered to the evaluation stage of RACP Annex 8.</p> | <p>Yes</p> |
| <p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.</p> | <p>The company has a complaint and grievance mechanism regulated in stakeholder communication and consultation (SOP-HRD-07-R00) and land conflict procedure (SOP : SSS-COMDEV(HMS)-024). The mechanism regulated the flow chart process. It is equipped with complaint form.</p> | <p>Yes</p> |
| <p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.</p> | <p>Procedure for calculating and distributing fair compensation has been in place in the similar document of SOP land compensation No. HRD-015-R00 dated 1 January 2016. It explains that the company has a standard of compensation calculation but also giving the compensated person a bargaining/negotiation position. The record of compensation process and outcome of negotiated agreement is documented. Based on interview with the community the community has understand the procedure of land compensation and their involvement in the compensation process. The result of the compensation process is distributed to the compensated party and can be accessed by stakeholder through information request.</p> | <p>Yes</p> |
| <p>Any Legal non- compliance is being addressed through</p> | <p>Personnel in charge to manage the legal documentation system are Legal Department (Led</p> | <p>Yes</p> |

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| | | |
|---|---|-----|
| measures consistent with the requirements of RSPO P&C criteria 2.1 | by Ibu Dewi). A system used for tracking any changes in laws and regulations was set-up through procedure No: SOP-HRD-017-R00. | |
| Did the company conduct an internal audit? If so, has a positive assurance statement been produced? | PT. Surya Sawit Sejati has conducted internal audit for legal compliance and explained the process for evaluate the compliance of regulation. | Yes |

3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

| Progress of scheme smallholders or outgrowers towards compliance with relevant standards | | |
|--|----------------|------------|
| Requirement | Remarks | Compliance |
| Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years. | Not applicable | N/A |

3.4 Details of findings

The nonconformity is listed below. The summary report of the assessment by criteria is listed in Appendix A.

During the Surveillance Assessment there one (1) Minor nonconformity raised. The Jendarata Palm Oil Mill Certification Unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the Corrective Actions for the Minor Nonconformity(ies) has been accepted and the effective implementation will be verified during next audit.

| Summary of Total Number of Nonconformity | | | |
|--|--|--|---------------|
| Nonconformity | | | |
| NCR Ref # | 1790505-201904-N1 | Clause & Category (Major/Minor) | 4.1.2 (Minor) |
| Date Issued | 20/06/2019 | Due Date | 19/06/2019 |
| Closed (Yes/No) | No | Date of nonconformity closure | "Open" |
| Statement of Nonconformity | The implementation of the procedure was not consistent | | |
| Requirement Reference | A mechanism to check consistent implementation of procedures shall be in place | | |
| Objective Evidence | 1. During Boiler Overhaul (Boiler BRB2) on 24 March 2019 and 25 March 2019, the supervisor (contractor) that be a standby person was not competent person as required as per Mill Procedure. | | |

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| | <p>2. During site visit at Jendarata POM, sighted trace of oil at discharge point from monsoon drain to estate drain which was not as per environmental management plan.</p> <p>3. The emergency response to fire break out at housing complex was not as per documented procedure, "Emergency Response Plan Seri Pelangi Estate"</p> |
| Corrections | <p>1. The clause on "Contractor shall ensure the workers who work in confined space possess relevant competent certificate ie. Authorized Entrance/Standby Personnel (AE/SP)" has been included in the Memorandum of Agreement (MOA) with immediate effect.</p> <p>2. T-joint has been constructed to ensure no oil spillage/discharge into the monsoon drain. The mill management has identified the environmental impacts (Water and soil contamination) and the action plan in the Environment Management Plan is that the final oil trap will be monitored closely to ensure no oil discharge into the waterways.</p> <p>3. The emergency response procedure for fire has been revised to conduct fire drill twice annually to enhance the preparedness of fire response team in the event of fire. Training programme has been revised to include fire drill training to be conducted twice annually.</p> |
| Root Cause Analysis | <p>1. The management did not monitor and ensure the workers who employed by the confined space contractors possess the competent certificate of Authorized Entrance/Standby personnel (AE/SP).</p> <p>2. The management did not monitor the functionality of oil trap at final discharge point.</p> <p>3. The management did not revise the frequency of fire drill to correspond with the annual training programme.</p> |
| Corrective Action | <p>1. The Company will appoint the NIOSH endorsed trainer to conduct in-house training for AE/SP for all staff and workers who involve on work in confine space of all UP's mills.</p> <p>2. The Sustainability Department will send a self-assessment form to all mills to inform the management to closely monitor the functionality of oil trap especially for the final discharge to waterways. In the event of any oil spillage found, the mill management shall take immediate corrective action to recover the oil spillage and make necessary improvement on the oil trap.</p> <p>3. The Sustainability Department will send a self-assessment form to all mills and estates to ensure the annual training programme (particularly on fire drill) are conducted twice a year and correspond with the emergency response procedure.</p> |
| Assessment Conclusion | The CAP was accepted. However the effective implementation will be verified during next assessment. |

| Opportunity for Improvements | |
|-------------------------------------|--------------------|
| OFI # | Description |
| OFI 1 | Nil |

| Positive Findings | |
|--------------------------|--|
| PF # | Description |
| PF 1 | Good feedback from internal and stakeholders in regards with company commitment for worker's social and welfare benefit. |

3.4.1 Status of Nonconformities Previously Identified and Observations

During the Surveillance Assessment 1 (ASA2_1), there were eight (8) Major and one (1) Minor nonconformity raised

| Summary of Total Number of Nonconformity | | | |
|---|---|--|-----------------------|
| Nonconformity | | | |
| NCR Ref # | 1650872-201804-M1 | Clause & Category (Major/Minor) | Indicator 6.5.2 Major |
| Date Issued | 27/06/2018 | Due Date | 25/09/2018 |
| Closed (Yes/No) | Yes | Date of nonconformity closure | 17/09/2018 |
| Statement of Nonconformity | Workers contract is not available. | | |
| Requirement Reference | Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc) shall be available in the languages understood by the workers or explained carefully to them by a management official. | | |
| Objective Evidence | <p>1) Worker Hashwin A/L Sukumaran at mill was converted to permanent worker from temporary worker. Hashwin started work on 30/01/2017. However after his conversion, the employment contract is not available.</p> <p>2) Worker Mariyae at Jendarata Estate has been contracted using the previous Labor Register system which only reference to NUPM/MAPA agreement. However, the register does not explicitly state the recent conditions example, holiday entitlement, reasons for dismissal and period of notice</p> | | |
| Corrections | <p>1) A comprehensive LRR will be developed which comprises of specific applicable laws with person in-charge to ensure the fine lines in each law are complied. In addition, confirmation letter has been issued to all local workers upon their confirmation.</p> <p>2) In addition to labour register card, an employment contract which clearly states on the pay condition and benefits entitlement for local workers has been developed and issued to local workers with effective of 1st March 2018. The contract is available in local language / language understood by the worker.</p> | | |
| Root Cause Analysis | <p>1) The management did not diligently follow the Legal Requirements Register (LRR) on Employment Act. In the past, it is stated in the offer letter that the probationary period for local workers is minimum 3 months. This probationary period is subject to extend up to 12 months. Within this period, if the worker has been confirmed, there is no confirmation letter provided to the worker as it is understood he/she has been confirmed. However, if he/she is not confirmed, a termination letter will be issued to him/her. The evidence on the continuity of an employee is the labor register card. This practice has been revised now and a confirmation letter is provided upon confirmation.</p> <p>2) In the past, the labor register card specified only on the compliance with MAPA/NUPW collective agreement. The management did not observe the inclusion of recent pay and benefits condition will leads to significant implication as the pay and benefit of all workers are equal and abide to MAPA/NUPW collective agreement.</p> | | |
| Corrective Action | <p>1) Internal memorandum attached with the confirmation letter and employment contracts have been issued to all estates and departments via email.</p> <p>2) The content of employment contracts has explained to workers and acknowledged by workers.</p> | | |

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| | <p>3) Training on Human Rights Policy has conducted regularly which covers prohibition of child labor, trafficked labor, equal treatment, freedom of association and etc.</p> <p>4) Internal audit has conducted to ensure all workers have been issued with employment contracts besides labour register card and ensure above noncompliance shall not be repeated.</p> |
| Assessment Conclusion | <p>Corrective action addressed and closed on 17/09/2018. Email communicated by Group Manager HR Mr Mathews on 29/06/2018 to all business unit within UP Group to implement the confirmation letter and employment contract for all local worker was verified. In United Plantations, the company is implementing 12 months probationary for all staff (this includes executive staff). The internal audit criteria have been revised (dated 20/08/2018) to cover Employment contract for all employees including check-roll and contract under indicator 6.5.1. In the previous checklist, it was only focusing on pay-slips for all employees. UP Group had issued an Internal Memo that all business units within Malaysia operations are required to undergo internal audit 3 times per year. The memo was dated 29/08/2018.</p> <p>An on-site assessment has been conducted on 05/09/2018. Interview with managers and local workers confirmed that the employment contracts are explained to workers during employment. The Managers understood the contract agreement implementation. The corrective action deemed to be sufficiently close the finding. The continuous implementation shall be verified again in the next assessment.</p> <p>Verification during ASA2_2: During ASA 2_2, verified the employment contract for S. Hashwin dated 01.01.2019 available and signed by worker, resident engineer with employer/employee witness. There were no recurrence issue on the employment contract sampled during this audit, therefore the NC was remained closed.</p> |

| Summary of Total Number of Nonconformity | | | |
|---|---|--|-----------------------|
| Nonconformity | | | |
| NCR Ref # | 1650872-201804-M2 | Clause & Category (Major/Minor) | Indicator 4.7.3 Major |
| Date Issued | 27/06/2018 | Due Date | 25/09/2018 |
| Closed (Yes/No) | Yes | Date of nonconformity closure | 17/09/2018 |
| Statement of Nonconformity | Worker are no provided with appropriate PPE. | | |
| Requirement Reference | All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. | | |
| Objective Evidence | The Personal Health Declaration Daily Records shows that workers are being monitored that the appropriate and safe PPE are used. However, Yeasin worker at the Palm Oil Mill was wearing a substandard safety helmet. | | |
| Corrections | Approved helmet has been issued to the workers with documented evidence (PPE issuance records with acknowledgement of receipt from the worker). PPE issuance records for the workers has been reviewed. The safety helmet and subsequently safety shoe was issued on 26/07/2018 | | |

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| Root Cause Analysis | The supervisor only inspected on the availability of PPE but did not thoroughly inspect the specification of the safety helmet. |
| Corrective Action | Training conducted to all supervisors of each station to ensure the PPE inspection checklist are filled with inspection on appropriate PPE with standard specification. The OSH Audit Checklist has been implemented to cross-check to implementation of the PPE. |
| Assessment Conclusion | <p>Corrective action addressed and closed on 17/09/2018. The training records for the mill supervisors were conducted on 03/09/2018. UP has implemented training evaluation to ensure effectiveness of the training. The records of the evaluation were available for the PPE checklist training. UP has implemented the Occupational Safety and Health Audit Checklist to audit the effectiveness of the PPE usage and meeting the standard specification. The audit is conducted on a monthly basis. The implementation at the mill date 28/08/2018 was verified. Interview during the Onsite closure with the supervisors on 05/09/2018 confirmed that the implementation on the corrective action was effectively implemented. The corrective action deemed to be sufficiently close the finding. The continuous implementation shall be verified again in the next assessment.</p> <p>Verification during ASA2_2: From the site verification in Field 76, 77 and Boiler station, not found any substandard PPE wearing by spraying workers and also verified from the PPE record and PPE stock. Latest PPE issuance dated 29 May 2019 In POM and 16 May 2019 for Jendarata estate. There were no recurrence issue found during this audit, therefore the NC was remained closed.</p> |

| Summary of Total Number of Nonconformity | | | |
|---|---|--|-----------------------|
| Nonconformity | | | |
| NCR Ref # | 1650872-201804-M3 | Clause & Category (Major/Minor) | Indicator 6.1.1 Major |
| Date Issued | 27/06/2018 | Due Date | 25/09/2018 |
| Closed (Yes/No) | Yes | Date of nonconformity closure | 17/09/2018 |
| Statement of Nonconformity | The SIA was not conducted entirely according to the RSPO P&C requirement | | |
| Requirement Reference | A social impact assessment (SIA) including records of meetings shall be documented | | |
| Objective Evidence | <p>According to the requirements, an SIA is required to be conducted to include factor such as access to rights, economic livelihoods, Subsistence activities, cultural & religious values, health and education facilities, other community values resulting from changes such as improved transport /communication or arrival of substantial migrant labour force.</p> <p>The Social Risk Assessment conducted in the both mill & estates only includes subsistence activities and employment conditions of the foreign workers</p> | | |
| Corrections | The methodology to conduct SIA is based on the risk matrix (Severity, Quantity/ Frequency, Probability). The assessment and management plan were developed with the participation of affected parties/stakeholders at estate/mill level and will be | | |

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| | reviewed annually. Group review on SIA has been conducted among all managers and ensure the assessment and management plan fully cover all aspects as per RSPO P&C guidance. |
| Root Cause Analysis | The SIA was reviewed by respective estates/mills and lack of guidance to conduct comprehensive SIA. |
| Corrective Action | The adequacy of SIA was discussed during annual sustainability management review and all inputs/requests/grievance raised by stakeholders shall be incorporated in SIA |
| Assessment Conclusion | <p>Corrective action addressed and closed on 17/09/2018. The methodology to conduct and review the SIA was provided by the Group Manager HR and ESH on 11/07/2018. The review of the SIA shall follow the index and the index is required to be review together with participation of stakeholders and the inputs from stakeholder to be recorded in the template of meeting minutes. The index of the SIA includes Access and use rights, Economics livelihoods and working conditions, Subsistence activities/ amenities, Human Rights, Cultural and religious value, Medical & health facilities, Education facilities and Operational activities. The evaluation criteria of the assessment have been established. The stakeholder meeting conducted at the mill and estates (mill - 02/07/2018; Seri Pelangi 31/07/2018; Jendarata 24/07/2018) and the meeting minutes was verified to confirms the inputs. The SIA has included the inputs from the stakeholders. In addressing the OFI for indicator 6.1.2 and 6.1.3, the SIA has indicated positive and negative impacts; method to mitigate the negative impacts and promotes the positive impacts; management plan developed with stakeholder inputs; responsible person on the management plan and the propose review date on the impacts. The corrective action deemed to be sufficiently close the finding. The continuous implementation shall be verified again in the next assessment.</p> <p>Verification during ASA2_2: The Social Impact Assessment (SIA) for Jendarata PO, Jendarata Estate & Seri Pelangi Estate has covered the access and use rights, economics livelihoods and working conditions, subsistence activities/amenities, human rights, cultural and religious values, medical & health facilities, education facilities and operational activities. There are social impacts management plan and social impacts review plan published according to the topics discussed. There were no recurrence issue on SIA sampled during this audit, therefore the NC is remained closed.</p> |

| Summary of Total Number of Nonconformity | | | |
|---|--|--|-----------------------|
| Nonconformity | | | |
| NCR Ref # | 1650872-201804-M4 | Clause & Category (Major/Minor) | Indicator 5.3.2 Major |
| Date Issued | 27/06/2018 | Due Date | 25/09/2018 |
| Closed (Yes/No) | Yes | Date of nonconformity closure | 17/09/2018 |
| Statement of Nonconformity | Containers are not disposed responsibly | | |
| Requirement Reference | All chemicals and their containers shall be disposed of responsibly. | | |
| Objective Evidence | At Jendarata Estate Division 2 Line site 1) At house B7, the was found that PETRONAS Lubricant Drum was recycled as water storage and lubricant container recycle for washing. 2) At house B8, the was found that paint container was recycle. | | |

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| Corrections | The lubricant and paint containers sighted in both house have been removed and keep in scheduled waste store as SW 409. A comprehensive weekly linesite inspection checklist which entirely cover the chemical/lubricant/paint containers, drain and hygiene of workers quarters, housing compound and composting pit. In addition, the checklist also covers the proper disposal of clinical waste in clinics/group hospitals. Internal memo was communicated by Group Manager HR and ESH on 27/07/2018 on the weekly inspection on disposal of chemical containers. The checklist includes location of linesite, shop houses, office, mill complex, composting pit, hospital, planting fields and other relevant area. The implementation of the checklist was verified at the mill. The implementation started in August 2018. |
| Root Cause Analysis | The Hospital Assistant (HA) in-charge for weekly linesite monitoring was not diligently inspect the workers quarters as well as housing compound and the inspection checklist was not comprehensive and did not cover the management on scheduled waste disposal |
| Corrective Action | A comprehensive weekly linesite / plantations (field) inspection checklist which ensure all chemical/lubricant/paint containers are disposed responsibly (reuse of chemical containers are prohibited except for chemical premix), drain and hygiene of workers quarters, housing compound, composting pit and within the plantations area. In addition, the checklist also covers the proper disposal of clinical waste in clinics/group hospitals. Internal audits will be carried out vigorously by HRESH Team to ensure the findings on the ground including workers' quarters, housing compound, composting pit, clinic/group hospital and all areas within our concession. |
| Assessment Conclusion | Corrective action addressed and closed on 17/09/2018. The internal audit criteria have been revised (dated 20/08/2018) to cover weekly inspection of fields & others areas within mill/estate concession & weekly inspection of workers and staff quarters, shop houses and office/mill complex. In the previous checklist, there was no specific criteria provided. UP Group had issued an Internal Memo that all business units within Malaysia operations are required to undergo internal audit 3 times per year. The memo was dated 05/09/2018. The continuous implementation shall be verified again in the next assessment. Verification during ASA2_2: From the verification of Linesite inspection, latest record was done on 2nd weeks of June 2019. This was done by weekly by HA, covered on Linesite,shophouse, office & Mill Complex, composting or landfill and others. There were no recurrence issue during this audit, therefore the NC was remained closed. |

| Summary of Total Number of Nonconformity | | | |
|---|--|--|-----------------------|
| Nonconformity | | | |
| NCR Ref # | 1650872-201804-M5 | Clause & Category (Major/Minor) | Indicator 4.7.4 Major |
| Date Issued | 27/06/2018 | Due Date | 25/09/2018 |
| Closed (Yes/No) | Yes | Date of nonconformity closure | 17/09/2018 |
| Statement of Nonconformity | Concerns of all parties about health, safety and welfare were not discussed at safety and health committee meeting, and any issues raised were not explicitly recorded. | | |
| Requirement Reference | The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. | | |

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| <p>Objective Evidence</p> | <p>Jendarata POM Workplace inspection report did not incorporated in the safety health committee meeting minute dated 28/12/17 and 4/4/18 as no documented report of workplace inspection as to date. Some of the unsafe act/dangerous occurrence observed during site visit at POM was not captured in the latest meeting minute dated 4/4/18: 1. No hot drain cover for turbine cooling water discharge near clarification station. 2. LPG store – oxygen and acetylene cylinder was not securely chained. 3. Shovel – safety device malfunction (revolving light, sensor and horn)</p> |
| <p>Corrections</p> | <p>The format of the workplace inspection checklist has been utilized by the management to identify all the unsafe act/condition and dangerous occurrence at workplace. OSHA meeting has been conducted and the documented outcomes of inspection is discussed. Drain cover has been constructed for hot water discharge from turbine cooling water. Oxygen and acetylene cylinder in LPG store has been chained at all times. The reverse light, sensor and horn have been repaired and ensure the functionality. The work place inspection was conducted on 28/06/2018 at sterilizer and marshalling yard for mill. The OSH meeting was conducted on 28/06/2018 to discuss the related safety concern raised.</p> |
| <p>Root Cause Analysis</p> | <p>Format of the workplace inspection checklist has been provided to all business units but Jendarata POM Management failed to follow the protocol and discuss the outcomes of inspection in OSHA meeting. Jendarata POM did not diligently identify the dangerous occurrence in the mill and did not maintain and record the inspection checklist genuinely.</p> |
| <p>Corrective Action</p> | <p>Training on workplace inspection and vehicle inspection checklist has conducted to ensure the Engineers, Supervisors for every station fully understand and genuinely fill-in the inspection checklist. OSHA internal audits has been carried out by Safety Officer to ensure all business units incorporate and discuss the outcomes of workplace inspection during quarterly OSHA meeting.</p> |
| <p>Assessment Conclusion</p> | <p>Corrective action addressed and closed on 17/09/2018. The training on work place inspection training was conducted by Mr Ramesh on 28/06/2018. Engineers and supervisors has been interviewed during the onsite closure assessment on 05/09/2018 to confirm The Occupational Safety and Health Audit Checklist has been implemented to audit the housekeeping, building structure, safety signage's, and meeting the standard specification. The audit is conducted on a monthly basis. The implementation at the mill date 28/08/2018 was verified.</p> <p>In Jendarata estate, the OSH meeting was conducted on 20/06/2018. The work place inspection was conducted 18/06/2018 to identify the risk. The internal audit criteria have been revised (dated 20/08/2018) to OSHA meeting minutes (including discussion on workplace inspection report and monthly OSH inspection checklist). In the previous checklist, there was no specific criteria provided. The continuous implementation shall be verified again in the next assessment.</p> <p>Verification during ASA2_2: From the record of OSH Meeting conducted on 27 March 2019 the management had included and discussed the issue from workplace inspection in the meeting, the record for previous meeting was sighted. Site verification found that the drain cover for turbine cooling water discharge near clarification station was available, LPG store – oxygen and acetylene cylinder were securely chained and verification for Shovel found that the safety device was in well function. There were no recurrence issue during this audit, therefore the NC was remained closed.</p> |

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| Summary of Total Number of Nonconformity | | | |
|---|---|--|-----------------------|
| Nonconformity | | | |
| NCR Ref # | 1650872-201804-M6 | Clause & Category (Major/Minor) | Indicator 4.7.2 Major |
| Date Issued | 27/06/2018 | Due Date | 25/09/2018 |
| Closed (Yes/No) | Yes | Date of nonconformity closure | 17/09/2018 |
| Statement of Nonconformity | Certain operations where health and safety was not comprehensively risk assessed | | |
| Requirement Reference | All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. | | |
| Objective Evidence | <p>i) Turbomiser Spray, last reviewed on 21 April 2017 (main hazard identified: physical injury and fatality. Chemical hazard and illness/occupational poisoning was not identified.</p> <p>ii) Circle spray, last reviewed on 3 April 2017 (main hazard identified: physical injury and chemical exposure)</p> <p>iii) Fertilizer application (mechanical) – last reviewed 3/4/17. (main hazard identified: physical body injury and fatality). Ergonomic hazard and dust/chemical exposure was not identified.</p> <p>iv) Harvesting – last reviewed 3/4/17 (main hazard identified: body injury, fracture). Ergonomic hazard was not identified and existing control measure is not sufficient (PPE requirement was not included in the SOP, only working tool/sickle cover @ scabbard described as for minimum PPE guideline) - hard hat, covered shoe is not part of the PPE requirement Activity – walking from palm to palm, hazard (hazard – hit by falling dried frond) existing control (training and briefing) – the last hierarchy of control on PPE was not identified.</p> <p>v) Railtrack maintenance – last reviewed on 3/4/17. Main hazard identified – body injury, fatality etc. Hazard not identified – heat stress, working under hot sun/immature area.</p> <p>vi) At Seri Pelangi Estate P&D foliar spray – last review 10/5/18. heat stress, working under hot sun/immature area has not been identified.</p> | | |
| Corrections | <p>Group review on HIRARC for respective operational activities has been conducted on 9th July 2018 to identify the potential risk related to ergonomic, heat stress, dust and chemical.</p> <p>HIRARC have been revised and relevant PPEs (Safety helmets for cutters and rubber shoes for cutters, loaders, stakers and loose fruits collectors) have been issued after due trainings. Management possess full commitment to minimize the impacts of head and foot injuries for harvesters. The records of the group review dated 09/07/2018 was verified. The responsible personnel for the respective business unit was present in the review. The revision on the HIRARC and workplace SOP for mill was conducted on 28/07/2018. The revision of the HIRARC included the ergonomic injuries.</p> | | |
| Root Cause Analysis | Lack of guidance and knowledge to identify potential risks specifically involving health and ergonomic risks. The training on HIRARC guidelines was not identified in the annual training program | | |
| Corrective Action | Internal audit will be conducted to ensure the training on the HIRARC guidelines has been incorporated in annual training program. Training on the HIRARC guidelines has been conducted by Safety Officer to all Managers and Heads of Department annually. | | |

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| Assessment Conclusion | <p>Corrective action addressed and closed on 17/09/2018. The HIRARC and SOP training for the mill was conducted on 30/08/2018. The annual training for HIRARC has been included in the annual training program. The training on the HIRARC includes the HIRARC Guidelines issued by the Department of Occupational Safety and Health Ministry of Human Resources 2008. The internal audit criteria have been revised (dated 20/08/2018) to include audit criteria on HIRARC & SOP and training. In the previous checklist, there was no specific criteria provided. The continuous implementation shall be verified again in the next assessment</p> <p>Verification during ASA2_2: On 11 August 2018 the training regarding to HIRARC and Workplace inspection was conducted. From the HIRARC verification in Jendarata Estate and Seri Pelangi estate, they already include ergonomic, Chemical hazard and illness/ occupational poisoning, and heat stress, working under hot sun/immature area, the hazard had been identified, dated 27 Dec 2018. The latest training for HIRARC was conducted on 5/4/2019. There were no recurrence issue during this audit, therefore the NC was remained closed.</p> |
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| Summary of Total Number of Nonconformity | | | |
|---|---|--|-----------------|
| Nonconformity | | | |
| NCR Ref # | 1650872-201804-M7 | Clause & Category (Major/Minor) | RSPO SCCS 5.8.2 |
| Date Issued | 27/06/2018 | Due Date | 25/09/2018 |
| Closed (Yes/No) | Yes | Date of nonconformity closure | 17/09/2018 |
| Statement of Nonconformity | Training provided to the personnel is not effective | | |
| Requirement Reference | Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed. | | |
| Objective Evidence | Training for Supply Chain has been conducted by Mr Goh (Resident Engineer) attended by 14 attendants from various position such as clerk, weighbridge and laboratory assistant. However during the site visit, it was found that the laboratory conductor and weighbridge operator are not having the good understandings and awareness regarding RSPO SCC although has joined the latest SCC training as above. | | |
| Corrections | Supply chain training has been re-conducted to improve the understanding of workers on supply chain model of Jendarata POM and training evaluation form is filled to ensure the contents of training are effectively delivered to workers. The training was conducted on 05/07/2018. The training slides was verified. The evaluation form shows that the workers involved in the supply chain had understood the requirements. | | |
| Root Cause Analysis | Supply chain training has been conducted for weighbridge clerks and lab attendants but the workers hardly remember the supply chain model of Jendarata POM. | | |
| Corrective Action | Training evaluation form has be filled after each supply chain training to ensure the workers are fully understand the supply chain procedures especially on supply chain model. The purpose of evaluation form is to examine the level of understanding for trainees (workers) after each training session and future training needs. | | |
| Assessment Conclusion | Corrective action addressed and closed on 17/09/2018. The evaluation form was implemented. The training effectiveness was carried by the ESH team on 22/07/2018. The evaluation forms are kept in the mill. During the onsite closure assessment, interview was conducted with weighbridge operator and lab conductor to confirmed the training was provided effectively. | | |

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| | <p>Verification during ASA2_2: The SCC training has been conducted on 22.02.2019 on the SOP Oil Mill SCC Module D, attended by 14 attendants from various position such as clerk, weighbridge operators, laboratory assistant, etc.</p> <p>During the stakeholder interview, it was found that the SCC training conducted was effectively delivered where the participants can demonstrate their awareness and understanding on RSPO SCC model. There were no recurrence issue during this audit, therefore the NC was remained closed.</p> |
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| Summary of Total Number of Nonconformity | | | |
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| Nonconformity | | | |
| NCR Ref # | 1650872-201804-M8 | Clause & Category (Major/Minor) | RSPO Rules on Market Communications & Claims (version 2016) 4.1 |
| Date Issued | 27/06/2018 | Due Date | 25/09/2018 |
| Closed (Yes/No) | Yes | Date of nonconformity closure | 17/09/2018 |
| Statement of Nonconformity | The RSPO Trademark logo was used not following to the Rules on Market Communication & Claims 2016 | | |
| Requirement Reference | A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim. | | |
| Objective Evidence | During the site visit and documentation review, it was found that the 7 CPO storage tanks in Jenderata POM and file documents has the RSPO trademark without the trademark license display. However, based on the 'RSPO Trademark' definition in RSPO Rules on Market Communications & Claims (version 2016), "RSPO Trademark' is defined as: The RSPO registered mark consisting of a rounded palm top accompanied by the letters 'RSPO', the (™) mark and accompanied by a valid license number. Company also only having the Trademark license under Unitata Berhad, (number: RSPO 1106002 valid from 06.10.16-05.10.18), not United Plantation Berhad. | | |
| Corrections | The application on RSPO Trademark License under United Plantations Berhad have been made to RSPO Trademark Department on 28th June 2018. The agreement on RSPO Trademark License was issued with effective from 5th July 2018. The RSPO round palm logo displayed on the CPO storage tanks will be amended to include the RSPO trademark license number. The RSPO Trademark License was received from RSPO on 06/07/2018. Site verification shows that the logo on the CPO storage tanks has been changed to include the license number. | | |
| Root Cause Analysis | Management are not aware that RSPO round palm logo shall be displayed along with the license number as is for off-products labelling and not for onproducts/promotional purposes. | | |
| Corrective Action | During the group review on SIA, EIA and HIRARC meeting, briefing on the use of RSPO round palm logo with license number was conducted for all Managers and Heads of Department. All requirements as stipulated in Rules on Market Communication & Claims 2016 hasbe included as audit scope during supply chain internal audit to ensure the supply chain practices are comply to SCCS June 2017 and | | |

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| | Rules on Market Communication & Claims 2016. |
| Assessment Conclusion | <p>Corrective action addressed and closed on 17/09/2018. The group review was conducted on 09/07/2018. Interview with the managers (Mr Goh) and assistance managers (Mr Mohd Faizul, Mr Mugilan) confirmed the understanding on the RSPO communication. The RSPO Supply Chain internal audit report summary template had included the requirement on the RSPO Rules on Market Communication and Claims.</p> <p>Verification during ASA2_2: Site only use the RSPO-General corporate communications since the trademark used on the file and storage tanks (off-product' claim). Sighted the RSPO trademark license no: 1-0004-04-100-00 with start date license from 05.07.2018 – 04.07.2020. There were no recurrence issue during this audit, therefore the NC was remained closed.</p> |

| Summary of Total Number of Nonconformity | | | |
|--|---|--|-----------------------|
| Nonconformity | | | |
| NCR Ref # | 1650872-201804-N1 | Clause & Category (Major/Minor) | Indicator 2.1.3 Minor |
| Date Issued | 27/06/2018 | Due Date | 26/06/2019 |
| Closed (Yes/No) | Yes | Date of nonconformity closure | 20/6/2019 |
| Statement of Nonconformity | Evidence of compliance for some of the conditions stipulated in Compliance Schedule (Jadual Pematuhan) [ref.: License No. 004239] was not adequately demonstrated. | | |
| Requirement Reference | A mechanism for ensuring that compliance shall be implemented. | | |
| Objective Evidence | <p>Legal compliance status were not adequately demonstrated:</p> <ul style="list-style-type: none"> • At JPOM, the visual records of the CCTV that pointing to chimney No. 7 (boiler 1) for the past 3 months was not able to be retrieved. The oldest record was on 20/5/2018 [ref.: item 30 of DOE's compliance schedule]. • It was found that the smoke density meter alarm was only triggered at 53% opacity and the smoke sensor was only able to give reading at maximum 23% opacity [ref.: item 26 of DOE's compliance schedule]. • At Seri Pelangi Estate, the application to renew the permit to store diesel and petrol was only done on 22/3/2018 i.e. after the permit had expired (2/3/2018). Based on requirement, the application of renewal must be made one month before expiry. | | |
| Corrections | <p>An external storage device has been installed to the decoder specifically for chimney's CCTV to enable retrieval of visual records for at least 3 months. Jendarata POM management has engaged the equipment supplier to carry out the calibration procedures and to ensure the smoke density meter alarm will trigger at 40%. Jendarata POM management will conduct regular check on the visual records of CCTV facing chimney. Jendarata POM management will regularly engage with equipment supplier to carry out the calibration procedures. The new external storage device was installed in July 2018. The purchase order was raised on 30/06/2018. The regular check on the CCTV and the smoke density is recorded in the Boiler Operation Log Due to server down on KPDNKK website, application have been submitted successfully on 22nd March 2018. Payment on the renewal has been paid and Bomba has carried out the inspection. The permit A035787 validity from 23/07/2018 – 22/07/2019 was verified to confirm the obtaining of permit. A training session will be conducted with the respective person in-charge of the requirements stipulated in the DOE compliance schedule. Training records for the respective person-in-charge was conducted on 11/08/2018.</p> | | |

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| | |
|------------------------------|---|
| Root Cause Analysis | <p>The existing external data storage device was shared among other equipment for visual records previously. Therefore, the new visual records for chimney was overwriting once achieve maximum storage.</p> <p>The smoke density meter alarm was triggered and adjusted by non-competent personnel during audit. The management did not diligently follow the fine lines in the permit (DOE compliance schedule).</p> <p>The permit renewal application for storage of diesel and petrol have been made via online but the application was failed due to upgrading of the KPDNKK website (server down).</p> |
| Corrective Action | <p>Improve the summary matrix of all permits by indicating renewal of permits 2 months prior to the expiry date and additional column indicating the date of renewed permits and person in-charge. Internal audits will be carried out to ensure all permits renewal are submitted to relevant authorities 2 months before the expiry date. Thus, the management expected to obtain the renewed permits before the permits expired even though due to some unforeseen circumstances eg. Online application system / server down. The group Legal Requirement Register will be reviewed.</p> |
| Assessment Conclusion | <p>Corrective action addressed and closed on 17/09/2018. The Summary of Permits & License monitoring has been revised to "3 months prior to expiry date" to ensure that application is made at least 3 months in advance. The person in-charge for the respective licenses is included in the summary.</p> <p>The internal audit criteria have been revised (dated 20/08/2018) to include audit criteria on Legal compliance and summary of permits & licenses. In the previous checklist, there was no specific criteria provided. The Legal Requirement Register has been reviewed on 13/08/2018. The revise LRR had included column "Status of Compliance by Estate/Mill Management" for compliance check.</p> <p>Verification during ASA2_2:</p> <ol style="list-style-type: none"> 1. During site visit, the CCTV for chimney no 7 (Boiler 2) was function. 2. The alarm for smoke density meter alarm was function well during site visit to the boiler. 3. The internal audit by HRESH team on was conducted on 5/3/19. The record was sighted during this audit. <p>Based on site verification and documents review, the corrective action plan was effectively implemented, therefore the minor NC raised was closed.</p> |

| Opportunity for Improvement | |
|------------------------------------|--|
| OFI# | Description |
| OFI 1 | <p>1650872-201804-I1</p> <p>Indicator 6.1.2, 6.1.3 & 6.1.4</p> <p>Details : Subsequent to the 6.1.1 related indicators, 6.1.2., 6.1.3 and 6.1.4 is yet to be assessed to be sufficient by the assessment team. Indicator 6.1.2-6.1.4 shall be assessed together while conducting the NC closing of 6.1.1.</p> <p>Verification during ASA2_2:</p> |

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| | |
|-------|---|
| | There are no other reoccurrence issue on SIA sampled during this audit, therefore the NC is remained closed for 6.1.1. |
| OFI 2 | <p>1650872-201804-I2</p> <p>Indicator 5.2.1</p> <p>Details : The term "High Conservation Value (HCV)" has to be used accurately. The certification unit needs to relook its classification of conservation area.</p> <p>Verification during ASA2_2: All the term HCV was revised accurately. The map of HCV area was reviewed accordingly by UPRD.</p> |

3.4.2 Summary of the Nonconformities and Status

| CAR Ref. | Category (Major / Minor) | P&C Indicator | Issued Date | Status & Date (Closure) |
|-------------------|--------------------------|--|-------------|--------------------------|
| 2017.01 | Minor | 1.1.1 | 25/05/2017 | Closed out on 26/08/2018 |
| 2017.02 | Minor | 2.2.2 | 27/05/2017 | Closed out on 26/08/2018 |
| 2017.03 | Major | 5.3.2 | 07/04/2017 | Closed out on 29/08/2017 |
| 1650872-201804-M1 | Major | 6.5.2 | 27/06/2018 | Closed on 17/09/2018 |
| 1650872-201804-M2 | Major | 4.7.3 | 27/06/2018 | Closed on 17/09/2018 |
| 1650872-201804-M3 | Major | 6.1.1 | 27/06/2018 | Closed on 17/09/2018 |
| 1650872-201804-M4 | Major | 5.3.2 | 27/06/2018 | Closed on 17/09/2018 |
| 1650872-201804-M5 | Major | 4.7.4 | 27/06/2018 | Closed on 17/09/2018 |
| 1650872-201804-M6 | Major | 4.7.2 | 27/06/2018 | Closed on 17/09/2018 |
| 1650872-201804-M7 | Major | SCCS 5.8.2 | 27/06/2018 | Closed on 17/09/2018 |
| 1650872-201804-M8 | Major | RSPO Rules on Market Communication & Claims (version 2016) 4.1 | 27/06/2018 | Closed on 17/09/2018 |
| 1650872-201804-N1 | Minor | 2.1.3 | 27/06/2018 | Closed on 20/06/2019 |
| 1790505-201904-N1 | Minor | 4.1.2 | 20/06/2019 | "Open" |

3.5. Stakeholders Consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Jendarata Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each

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meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

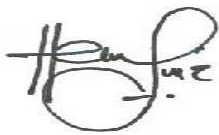
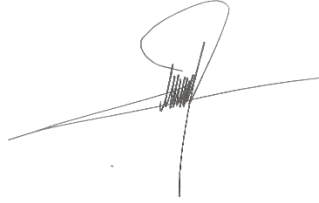
Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

| List of Stakeholders Contacted | |
|---|---|
| Internal Stakeholders Workers Representative Gender Committee Mill Operators Sprayer Harvester Temple and Mosque Representatives | Union/Contractors/Local Communities Contractor NUPW Secretary |
| Government Departments Representative from SJK(T) Ladang Jendarata 2 | NGO No complaint by NGO for Jendarata CU. Therefore, NGO was not contacted. |

| IS # | Description |
|-------------|--|
| 1 | Feedbacks: <u>NUPW Secretary</u> Meetings has been conducted regularly. Workers were given freedom to join or form trade union. Some of the workers joined NUPW in mill and estate. |
| | Management Responses: Management noted on the information and will continue the good practices. |
| | Audit Team Findings: No other issue. |
| 2 | Feedbacks: <u>Gender Committee Representative</u> There is no sexual harassment case reported so far, and meetings were conducted regularly combined for mill and estate. Most of the female workers said that the workers in office especially were their own family or relatives. |
| | Management Responses: Management noted on the information and will continue the good practices. |
| | Audit Team Findings: No other issue. |
| 3 | Feedbacks: <u>SJK(T) Ladang Jendarata 2</u> School has received contribution from United Plantation in terms of building maintenance, road repairs, events, etc. School management would like to thanks United Plantation for their supports. |
| | Management Responses: Management noted on the information and will continue the good practices. |
| | Audit Team Findings: No other issue. |
| | Feedbacks: |

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| | |
|-----------------|---|
| <p>4</p> | <p><u>Contractors (Harvesting & Construction)</u> Contractors had attended the company policies training and stakeholder meeting. They aware on RSPO and MSPO requirement. They also said that there is no payment issue and contract agreement was available.</p> <p>Management Responses: Management noted on the information and will continue the good practices.</p> <p>Audit Team Findings: No other issue</p> |
| <p>5</p> | <p>Feedbacks: <u>Workers’ Representatives</u> The worker’s representatives come from Bangladesh, Nepalese, Indonesia and South India were interviewed on their current employment, work, accommodation, welfare, etc. So far no issue raised and they were happy on the way management treat them.</p> <p>Management Responses: Management noted on the information and will continue the good practices.</p> <p>Audit Team Findings: No other issue</p> |
| <p>6</p> | <p>Feedbacks: <u>Temple and Mosque Representatives</u> Company has taking a good care on Temple and Mosque where the contribution were given as per request on the improvement and maintenance of the building.</p> <p>Management Responses: Management noted on the information and will continue the good practices.</p> <p>Audit Team Findings: No other issue</p> |

| Formal Signing-off of Assessment Conclusion and Recommendation | |
|--|---|
| <p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Jendarata Palm Oil Mill Certification Unit has complied with the RSPO P&C MYNI 2014 & RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Jendarata Palm Oil Mill Certification Unit is continued.</p> | |
| Report prepared by | Acceptance of Assessment Conclusion |
| Name: Mohd Hafiz Mat Hussain | Name: Cheriachangel Mathews |
| Company Name: BSI Services Malaysia Sdn Bhd | Company Name: United Plantations Berhad |
| Title: Lead Auditor | Title: Group Manager, Human Resources and Environment, Safety & Health (HRESH) |
| Signature:  | Signature: <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p>  |
| Date: 27/06/2019 | Date: 28/06/2019 |

Appendix A: Summary of Findings

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|--|------------|
| Principle 1: Commitment to Transparency | | | |
| Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making. | | | |
| 1.1.1 | There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance - | The stakeholder list sighted for this assessment are the Jendarata POM stakeholder list 2019, Jendarata Estate stakeholder list 2019 and Seri Pelangi Estate Stakeholder List 2019 which includes Guest workers, NGOs, Government agencies, Schools and internal local community. The Stakeholder Handbook and the employee handbook distributed contains the method and procedure for information request. Interview with the stakeholders confirmed that they received the handbook. | Complied |
| 1.1.2 | Records of requests for information and responses shall be maintained. -Major compliance | For RSPO P&C & SCC, the person responsible for communication with the local external stakeholders is Mr P. Rajasegaran as per appointment letter dated 15 th February 2019 signed by Group Manager, Human Resources and Environment, Safety & Health for Jendarata POM, Mr C. Mohan Das for Jendarata Estate as per appointment letter dated 29 th March 2018 signed by Chief Executive Director and Mr Khor Boon Wah for Seri Pelangi Estate as per appointment letter dated 29 th March 2018 signed by Chief Executive Director. For 2019, there is request from SJK(T) Ladang Jendarata 3 to repair the school entrance gate on 01.04.2019 the mill for external stakeholder while for housing maintenance issue raised from the internal stakeholders. In Jendarata Estate & Seri Pelangi Estate, the Registry Record of Requests book is maintained. The requests include temple ceremony request, TNB, school etc. | Complied |
| Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. | | | |

| Criterion / Indicator | Assessment Findings | Compliance | |
|--|---|--|-----------------|
| <p>1.2.1 Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p> | <p>UP Plantations Bhd has communicated its Policy on Documents that can be Publically made available dated 11/01/2014 undersigned by Chief Executive Director through the United Plantations Berhad website: http://unitedplantations.com/sustainability/pdf/Policy%20on%20Documents.pdf and through the stakeholder’s handbook and worker’s handbook.</p> <p>The Policy includes Land titles / user rights; Occupational health and safety plans; Plans and impacts assessment relating to environment and social impacts; HCV documentations; details of complaints and grievances; negotiation procedures; continual improvement plans; public summary of Sustainable Palm Oil certification assessment report and human rights policy.</p> <p>Interview with both internal and external stakeholders confirmed that the Handbook has been disseminated.</p> | <p>Complied</p> | |
| <p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p> | | | |
| <p>1.3.1</p> | <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p> | <p>The code of conduct and business ethics has been undersigned by CEO Dato Carl Bek-Nielsen on 08/12/2016. The code is translated to various languages (e.g. Hindi, Tamil and Indonesian).</p> <p>The code is being briefed to the workers including foreign workers at the point of employment. Example – for Bangladesh workers (G2G program), it is being briefed when they arrived to Malaysia; for Bangladesh workers (G2G Plus Program), it is being briefed during the interview process at Dhaka.</p> | <p>Complied</p> |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|---|------------|
| | | The presentation materials have been sighted. The workers have been interviewed to confirmed that the code of conduct has been briefed to them. The company policy briefing has been conducted on 18.03.2019 to all 105 workers (Jendarata POM), 18.05.2019 to all 471 workers (Jendarata Estate) and 13.06.2019 to all 78 workers (Seri Pelangi Estate). | |
| Principle 2: Compliance with applicable laws and regulations | | | |
| Criterion 2.1: | | | |
| There is compliance with all applicable local, national and ratified international laws and regulations. | | | |
| 2.1.1 | Evidence of compliance with relevant legal requirements shall be available. - Major compliance - | Evidence of compliance with relevant legal requirements were demonstrated for Jendarata POM Management Unit. Sighted sample of permits and licenses. License and permit sampled: i) Akta Kemudahan and perkhidmatan Jagaan Kesihatan Swasta 1998, Group hospital license,no. license: 130807-00306-01/2018 serial number : 003993 valid until 23 February 2020 ii) Machinery certificate of fitness (hoist, UPV and SB) PK PMA 1641 valid until 29/10/2019 PMT 115811 Valid until 29/10/2019 PK PMD 240 valid until 15 Jan 2019 iii) MPOB license, 508108704000 valid until 31/3/2020. iv) Diesel and petrol permit, serial no.A037424, reference no. TI/SK/066(03) valid until 29/10/2019. v) AGT(NW-HQ-AGT-R-0169-Q) valid until 16 May 2022 and AESP have 5 person, sampling on NW-PNG-AE-R-1216-Q valid until 26/6/2020. For Jendarata estate as per below:- i) Raw water extraction, Jenderat have permission from JTK dated 10 October 2017 can be refered to letter (3)dlm.PTK.TI.(2) 32/1/1 Jld 4. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|--|------------|
| | | <ul style="list-style-type: none"> ii) PK PMT 9867 referred PMT-PK/18 19291 valid till 1 July 2019. iii) Electrical installation at Div 1 referred ST(PIP) P/S/PRK/00983 valid till 2 Oct 2019 iv) Autoclave referred cert PK-PMD 1030 valid till 1 July 2020 <p>For Seri Pelangi estate</p> <ul style="list-style-type: none"> i) Storage of Diesel & Petrol license was available license no A035787 valid from 22 July 2019 ii) Air compressor license available PK PMT 9858 valid till until 28 July 2020 iii) Weighbridge license referred B1298732 valid until 18 Jan 2020 iv) MPOB License 502207202000 valid until 31 Oct 2019 v) License for buying Monocrotophos (300L) available referred letter PRK/2019/MONO/028(GL) <p>Sighted the permit issued by JTK as follow:</p> <ol style="list-style-type: none"> 1. JTK Permit on salary deduction. Reference: (6) dlm BHG PU/9/129 dated 01.06.2012 2. JTK Permit on increase the overtime limit from 104 hours to 130 hours' month. Reference: (21) JTK.PK(1) PMT(SEK.60)/10805 dated 05.11.2014. | |
| 2.1.2 | A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance - | The management continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the UP's operation. Each office of the operating unit (mill and estates) has its own legal register and were being evaluated individually from time to time for compliance mainly through internal audit. Among the applicable legal laws registered are EQA, OSHA, Factory & Machinery | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|--|------------|
| | | Act, Employment Act, Workers' Minimum Standard of Housing and Amenities Act, to name a few. | |
| 2.1.3 | A mechanism for ensuring compliance shall be implemented. - Minor compliance - | The UP has various mechanisms to ensure the legal requirements are complied with. Among the mechanisms verified were: - In LRR format there is a coluMH to report the status of compliance which was utilised to report the compliance status of all the applicable legal requirements. Other information available in the format was document/action plan needed, PIC and frequency of monitoring - There was a list of licenses which have the information about type of license, expiry date and validity period | Complied |
| 2.1.4 | A system for tracking any changes in the law shall be implemented. - Minor compliance - | The Company Secretary (HQ) is given the responsibility to track and update any changes in the law. Among the method or platforms used for tracking are: a) Internet subscription such as Lawnet.com b) News and announcement from statutory bodies and government departments such as SOCSO, EPF, etc. c) Participation of associations and seminars such as Malayan Agricultural Producers Association (MAPA), Malaysian Palm Oil Association (MPOA) Ever since the last assessment, among the new updates registered were: - 0% GST - Employment Insurance System Bill 2017 | Complied |
| Criterion 2.2: | | | |
| The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights. | | | |
| 2.2.1 | Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance - | Jendarata Estate and Sri Pelangi Estate was able to demonstrate its right to use the land through possession of land titles. All the land titles at both estate visited were sighted. | Complied |
| 2.2.2 | Legal boundaries shall be clearly demarcated and visibly maintained. | Demarcation of boundaries at both visited estates was well maintain especially the boundaries with third parties. A few methods were applied | Complied |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|------------|
| - Minor compliance - | such as concrete pegs white colour (printed info of GPS coordinates), trenches, roads and barb wire fencing. In Jendarata we sampling on boundary UPL6 at Field 78 boundary with Mr Govinden. | |
| 2.2.3 Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance - | There was a dispute dated 07/04/2016 with Jasa Budiman Estate on Temporary Occupation License (TOL) land issue. The issue has not been resolved due to no response received from owner of Jasa Budiman. UP last communication with Jasa Budiman was on 14/06/2018. TOL land is land issued by government for temporary usage. UP had also submitted TOL Land application. TOL land does not belongs to any party and the license of renewal is subject to the State Government approval. For this claim, it is not related to land acquisition. Hence the FPIC is not associated to this dispute. | Complied |
| 2.2.4 There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance | As stated in 2.2.3, there was a land dispute on government TOL land. UP had tried its very best to engage with complainant. However, there was no response. | Complied |
| 2.2.5 For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance | As stated in 2.2.3, the land dispute was on government TOL land. The land dispute is not related to the UP taking up land belongs to community. TOL land belongs to state government and the government on a yearly basis will grant the land for temporary use. | Complied |
| 2.2.6 To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance | UP has invited Jasa Budiman for resolution. However, the affected party had not responded to UP. | Complied |

| Criterion / Indicator | Assessment Findings | Compliance | |
|--|--|---|----------|
| Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent. | | | |
| 2.3.1 | Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities). - Major compliance - | No legal and customary land was identified for this certification. However, user rights were given by UP to the surrounding community to utilize the Indian Temple located within the UP vicinity. The stakeholders were interviewed to confirm use access was given and there was no customary land at the certification unit. | Complied |
| 2.3.2 | Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance - | There is no new planting for the certification unit. Hence no copies of agreement are available. | Complied |
| 2.3.3 | All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. | There is no new planting for the certification unit. Hence the relevant information is not available. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | |
|---|--|--|------------|----------------------|-------|--|--|--|------|------|------|------|------|------|----------------|-------|-------|--------|--------|-------|----------|
| | -Minor compliance | | | | | | | | | | | | | | | | | | | | |
| 2.3.4 | Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance | There is no new planting for the certification unit. Hence the relevant information is not available. | Complied | | | | | | | | | | | | | | | | | | |
| Principle 3: Commitment to long-term economic and financial viability | | | | | | | | | | | | | | | | | | | | | |
| Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability. | | | | | | | | | | | | | | | | | | | | | |
| 3.1.1 | A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance - | The visited estates were able to demonstrate their business or management plan through establishment of annual budget with projection of three years (2019 to 2021). The budgeted expenses includes harvesting, manuring, weeding, road maintenance, railway maintenance, drain maintenance and conservation to name a few. Estimated crop was also available. Verification of the budget showed that the average operational cost is RM550/mt CPO and RM3,000/Ha. | Complied | | | | | | | | | | | | | | | | | | |
| 3.1.2 | An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance - | Both visited estates have established their replanting program with minimum of 5 years projection. Verification of the programme showed the following sampling: <table border="1" data-bbox="1010 1018 1850 1166"> <thead> <tr> <th></th> <th colspan="5">Replanting programme</th> </tr> <tr> <th>Year</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>Jendarata (ha)</td> <td>299.9</td> <td>282.8</td> <td>298.74</td> <td>248.16</td> <td>139.6</td> </tr> </tbody> </table> | | Replanting programme | | | | | Year | 2019 | 2020 | 2021 | 2022 | 2023 | Jendarata (ha) | 299.9 | 282.8 | 298.74 | 248.16 | 139.6 | Complied |
| | Replanting programme | | | | | | | | | | | | | | | | | | | | |
| Year | 2019 | 2020 | 2021 | 2022 | 2023 | | | | | | | | | | | | | | | | |
| Jendarata (ha) | 299.9 | 282.8 | 298.74 | 248.16 | 139.6 | | | | | | | | | | | | | | | | |
| Principle 4: Use of appropriate best practices by growers and millers | | | | | | | | | | | | | | | | | | | | | |
| Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored. | | | | | | | | | | | | | | | | | | | | | |
| 4.1.1 | Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance - | There was a standard SOP prepared for the whole UP Estates and Mills. SOP latest revised on December 2016. SOP covered all aspects of Mill Operation and 16 SOPs were listed with additional SOP developed specially for Biogas Plant. The SOP copy is available in the Mill office and | Complied | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|---|-----------------------|
| | | observed implemented accordingly. Agriculture best practice for the certification unit was guided by Standard Operating Procedures (Manual) (supplements)[approved by Ho Dua Tiam, Sr. Executive Director, dated 10/12/2007] which contents the following operations: Nursery, Replanting, Upkeep mature/immature oil palm, Water management , Roads – Paths, Railway locomotive, Railway track, Boundaries , Oil palm pest management , Manuring immature & mature oil palm, Harvesting collection. | |
| 4.1.2 | A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance - | Mechanism to check consistent implementation of procedures is through internal audit by HRESH team on 5/3/19. 31 non-compliances recorded with regards to P&C indicators and ESH together with 5 OFI for improvements. Follow up audit was carried out 23/4/2019 and all finding raised have been closed effectively. The mechanism of checking the consistent implementation was mainly carried out through field supervision by field staff, executive and managers. However during site verification in field and Mill we found during Boiler Overhaul (Boiler BRB2) on 24 March 2019 and 25 March 2019, Contractor Supervisor that be a standby person was not competent person as required as per Mill Procedure. Found water that discharge out to estate from perimeter drain have oil contamination was not followed as per Environmental Management Plan. Thus Minor Nc was raised. | Minor Non-conformance |
| 4.1.3 | Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance - | Records of monitoring with regards to EHS and RSPO implementation are maintained and available for verification. Sample of records checked: i. Inspection report by Competent Electrical Engineer, JK-T-5-B-00431996. Refer to report dated 26/4/18. ii. Internal audit report dated 5/3/2019 by HRESH Department. Records of monitoring were properly maintained by the estates for example, at Jendarata Estate the harvesting quality inspected by the | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|--|------------|
| | | checkers through utilisation of form UPB No. 28 – sampled: UPB No 28 dated 15/6/2019, field 84,54 and 24A by Ms Kanniga. | |
| 4.1.4 | The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance - | No 3rd party sourced FFB received at Jendarata POM | Complied |
| Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield. | | | |
| 4.2.1 | There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance - | The manuring operation is guided by a procedure, Field Management Manual (Supplements) (S1.2.2, December 2004). There were 2 method of application i.e. manual broadcast for palms <4 years old and using mechanised spreader for palms >4 years old. | Complied |
| 4.2.2 | Records of fertiliser inputs shall be maintained. - Minor compliance - | The application of fertilisers was done based on recommendation made by agronomist. Records of application were adequately maintained by the estates. Based on the recommendation by agronomist the average dosage was around 6 kg/palm/year with combination of straight and mixed fertilisers. Verification of the fertilisers input records such as progress report and store issuance. | Complied |
| 4.2.3 | There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance - | There is evidence of periodic tissue and soil sampling. Leaf analysis was done on 27/2-29/4/2017 (ref.: lab test no.: A010/17) for 2018. Soil sampling was last done 5 March 2018 (ref.: lab test no.: E002/18) by UPID (UP Research Dept.). | Complied |
| 4.2.4 | A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance - | Supply of EFB was quite limited due to mill usage for boiler fuel. Thus, the application of EFB in the estates was done in a small scale. Application of POME was carried out through land application. Based on the records, Jendarata Estate had applied 93,678 m3/71.6 Ha in 2017. | Complied |
| Criterion 4.3: | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|--|------------|
| Practices minimise and control erosion and degradation of soils. | | | |
| 4.3.1 | Maps of any fragile soils shall be available. - Major compliance - | Soil maps were made available for the estates. Example, based on the soil map at Jendarata Estate, the soil type is Bayas Series (deep peat >9'), Bayas Series (deep peat >6'-9'), Nipis Series (moderately deep 3'-6'), Penor Series (shallow peat <3'), Sabrang Series, Sedu Series, Jawa Series, Selangor Series and Briah Series. Soil type at Sri Pelangi is all mineral. | Complied |
| 4.3.2 | A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance - | The management strategy for planting on slopes between 9 and 25 degrees is addressed in the land preparation procedure (planting and replanting). The major method to minimise soil erosion was construction of terrace. Avoidance of bare soil was done through establishment of cover crop. | Complied |
| 4.3.3 | A road maintenance programme shall be in place. - Minor compliance - | Road maintenance programmes were available for the visited estates. Among the activities in the programme were resurfacing, patching, grading, compacting and bridge/culvert maintenance. Based on progress report and budget, Jenderata has completed around 41% of its programme for 2019. | Complied |
| 4.3.4 | Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance - | Subsidence of peat was done using peat probe. Based on the records monitored since 2010, it showed that the subsidence was around 2cm/year. | Complied |
| 4.3.5 | Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance - | Drainability assessment already been conducted dated 17 Jan 2019 by UP research Bhd. At Field 78,79,80,81 and 82 referred record 1.977/175/2019. From the report good drainability where the excess water in the field could be drained off by gravity even during the highest tide (Apical, 2015). | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|------------|
| 4.3.6 | A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance - | The management strategy for peat soil is addressed in a procedure. Water table is maintained between 60 to 90 cm through management of bunds and water gates. | Complied |
| Criterion 4.4: Practices maintain the quality and availability of surface and ground water. | | | |
| 4.4.1 | An implemented water management plan shall be in place. - Minor compliance - | Water management plan is documented under 5 year's continuous improvement plan for Jenderata Estate and Seri Pelangi Estate. Water management at Jenderata complex is guided by SOP (Manual), 4.0 Water Management. The water management plan was available as follow: <ol style="list-style-type: none"> 1. At onset of dry spell, install sandbags for rain harvesting 2. Operating water pumps 3. Weir platforms to be raised 4. During high tide, allow natural in flow of water Water tables to be maintained between 45-60 cm for acid sulphate areas and 60-90 cm for non-acid sulphate, at a mean of 60 cm below ground surface. The water tables are controlled through water gates and weirs in the field irrigations. To-date there are 15 water gates (1:425 Ha) and 127 weirs (1:50) at Jenderata Estate. | Complied |
| 4.4.2 | Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance - | The estates have maintained its established riparian reserves mainly by avoidance of agrochemical usage at the designated zones. The water quality was also regularly monitored for e.g. at Jenderata Estate, there were 2 outlets to Sg Bernam i.e. at Field 64 & 65. Among the parameters tested for water quality were pH, BOD, COD, TSS, O&G, DO, AN and E. Coli. Last sampling was done on 5-6/10/2018 (Jendarata Estate) and analysis was done by BP Food Environmental Testing (SAMM No. 573). The report (BBR00051, 00052, 00053/1118E) was sighted. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|---|------------|
| 4.4.3 | Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance - | DOE's Compliance Schedule (Jadual Pematuhan) [License No.: 004233] for period 1/7/2018-30/6/2019 was sighted. As per compliance schedule, there was 2 types of discharge for effluent; land application and discharge to river. Jendarata POM was required to treat its effluent until the BOD level is below 5,000 mg/l before discharging it to land application through furrow system and below 100 mg/l before discharging to river. A biogas plant was also in place as part of the treatment series. Based on the latest four quarterly returns to the DOE, BOD readings of final discharge were all below 5,000 mg/l. The samples of final discharge were analysed by an accredited third party laboratory, ChemVi Laboratory Sdn Bhd. Sighted the COA dated 22/3/2019, 28/2/2019, 28/1/2019, 21/12/2018, 29/11/2018 and 19/10/2018. | Complied |
| 4.4.4 | Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance - | Mill has maintained monitoring of water usage for processing FFB which recorded every month. Water for processing is abstracted from water catchment by using pump. An average of 1.70 m ³ (to date May 2019) water is used to process per mt of FFB compared to 1.68 m ³ /tonne FFB in 2018. | Complied |
| Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques. | | | |
| 4.5.1 | Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance - | Implementation of IPM is guided by Field Management Manual (supplements). The estates has established beneficial plant such as Tunera sp. Carambola, antigonon and Cassia cobanensis. Barn owls were also kept in field e.g. in Jendarata Estate, there were 186 boxes available with 85 boxes occupancy, based on the census records. | Complied |
| 4.5.2 | Training of those involved in IPM implementation shall be demonstrated. - Minor compliance - | The IPM training at Jendarata was last conducted on 21 May 2015, attended by 4 workers. Among the topics covered were planting of beneficial plant, pheromone trap and barn owl maintenance. | Complied |
| Criterion 4.6: | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|---|------------|
| Pesticides are used in ways that do not endanger health or the environment | | | |
| 4.6.1 | Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance - | Justification of all pesticides used was defined in the Chemical Register. Among the information available is type of spraying operations and its type of chemical used e.g.: <ul style="list-style-type: none"> • Circle spray (mature) – e.g. glyphosate + amine + methylsulfuron • Circle spray (immature) – e.g. Basta (a.i.: glufosinate isophrophylamine) • Bagworm & rhino beetles treatment – e.g. cypemethrin (turbomiser) • Rat baiting – e.g. warfarin • Cover crop spray – e.g. fusillade | Complied |
| 4.6.2 | Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance - | The estates continued to maintain their records of pesticides consumption and updated on monthly basis. The information about LD50, and a.i. applied per ha was available for verification. | Complied |
| 4.6.3 | Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance - | There was no prophylactic use of pesticides. The application of pesticides were based on level of attack severity which was normally obtained through census. E.g. the use cypermethrine for bagworm control at field 44 and 75 was based on bagworm census. The census records were available for verification. Where estates have been identified to be prone to nettle caterpillar and bagworm outbreaks, the critical threshold level can be reduced to 5 live larvae per frond. In specific situations these action thresholds can be refined to suit particular situations in consultation with UPRD [ref.: Field Management Manual (FMM)]. | Complied |
| 4.6.4 | Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such | Based on chemical register dated 30/4/19, no WHO class IA and IB used. The used of Paraquat is banned since 2010. Only class II, III and IV chemical used in the estate except for Seri Pelangi estate They used Monocrotophos (Class 1B) for bagworm. | Complied |

| Criterion / Indicator | Assessment Findings | Compliance |
|--|---|------------|
| pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance - | | |
| 4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance - | Pesticides were handled, used or applied by trained workers applied in accordance with the product label. Latest training for pesticides handler was conducted on 16 May 2019. Appropriate safety and application equipment were provided and used, i.e carbon filter respirator, 3M 3744K, goggles, apron and wellington boots. All precautions attached to the products were properly observed, applied, and understood by workers based on the interview with staff and workers at visited estates | Complied |
| 4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance - | The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation. Separate vault will be used to store class IA and IB chemical. | Complied |
| 4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance - | Method use for pesticides application is based on SOP no.44, Spraying Pest and Disease dated 3/4/17. Mechanized spray method is used using Turbo miser with class III chemical, Cypermethrin replacing class I chemical, Monocrotophos. Complete PPE is worn by operator during site visit at field 1(weedicide spray). | Complied |
| 4.6.8 Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance - | Pesticide application by aerial spraying is not practiced by the company | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|--|------------|
| 4.6.9 | Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance - | Training to enhance knowledge and skills of employees are regularly given, can refer to Indicator 4.7.3 | Complied |
| 4.6.10 | Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance - | Disposal method of all identified waste was already included in the pollution prevention plan where the site visit confirmed that the practice of reduce, reuse and recycle of materials has been implemented throughout the company within mill and estates. | Complied |
| 4.6.11 | Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance - | The medical surveillance already been done by Jendarata Estate on 22 Feb 2019 attended by 47 People and all fit to work by Dr Lee Teil Leong (HQ/12/Doc/00/279) from Klinik & Surgeri Lee. For Seri Pelangi estate they management sent workers to medical surveillance on 23 Feb 2019. from the surveillance all workers are fit to work for chemical. | Complied |
| 4.6.12 | No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance - | No women sprayer at Jendarata Estate and Seri Pelangi Estate. | Complied |
| Criterion 4.7: | | | |
| An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following: | | | |
| 4.7.1 | A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance - | Occupational Safety and Health Policy was observed available. Relevant safety operating procedures covering overall Mill operation signed by Chief Executive Director. The policy was written in English, Malay, Tamil, Hindi, Nepali and Bangladesh language. The policy cover effort in accident prevention by conducting HIRARC, training and supervision. The OSH plan has developed and in-lined with company's policy and incorporated with the training plan and OSH compliance monitoring programme. Among OSH plan implemented for 2018-2019: i)LEV testing and monitoring | Complied |

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|-----------------------|---|------------|
| | <p>Annual LEV monitoring was carried out on 28/12/17 by registered industrial hygiene technician 2, HQ/18/JHII/00/00014 from Chemviro enterprise. The system installed at laboratory was in compliance with ACGIH and USECHH Regulation 2000 requirements on ducting velocity. Refer to report, HQ/18/JHII/00/00014-2019/020 dated 1 March 2019.</p> <p>ii) Audiometric Testing The latest audiometric testing was carried out on 8 April 2019 for total of 58 workers for Jendarata POM. Report, dated 24/5/19 was verified. Total of 1 workers reported with hearing impairment. Further check with ENT doctor was done on June 2019. Hearing conservation training done on 31 May 2019 by Chemviro Enterprise for 1 person.</p> <p>iii) Personal Chemical Exposure Monitoring In Biogas plant The latest test was last carried out on 1 March 2019 for Methane and Hydrogen Sulphide exposure. Based on the results, Permissible Exposure Limit (PEL) for the above chemical is below the limit as stipulated under USECHH Regulation 2000. HQ/17/JHI/00/00012-2019/015. For hexane and chromium in Lab referred report HQ/17/JHI00/00012-2019/016, result show not detected.</p> <p>iv) Medical Surveillance Medical surveillance was last done for workers from laboratory, welders and Store operator. The last medical surveillance was carried out on 17/5/18 by OHD; HQ/12/DOC/00/279 under "Klinik and Surgery Lee". Result of the Medical Examinations found to be normal without any health detrimental issues.</p> <p>v) Accident For Jendarata Estate, OSH meeting conducted on 20 March 2019 from the minute meeting mention 2 accident happen on 24 Jan 2019, the investigation done by management dated 19 Feb 2019 referred PPK no.</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | |
|-----------------------------|---|--|------------|------|--------|-----------------------------|--------------|---------------|---------------|-------------|---------------|--------------------|-------------|---------------|------------------------|---------------|---------------|--------------------|-------------|---------------|----------|
| | | PK 04/04/390.HIRARC also been reviewed on 1 April 2019. This accident already been claim. The letter to JTK already been sent on 23 May 2019. | | | | | | | | | | | | | | | | | | | |
| 4.7.2 | All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance - | Risk of all operation documented under HIRARC register. Risk identified according to each station/activities at POM such as sterilizer bay, press station (screw press operation, digester and etc), oil clarification, workshop, laboratory and etc. Other auxiliary operation like biogas plant has been identified as well. Latest review of HIRARC was done 17 March 2019 for the latest accident involved at Boiler area. In addition to specific training courses, safety briefings are given during muster to reinforce awareness such as correct wearing of PPE. | Complied | | | | | | | | | | | | | | | | | | |
| 4.7.3 | All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance - | <p>Training Programme for the year 2018 and 2019 was established. Awareness and training programme had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. Training record can refer to Indicator 4.8.2</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>Hearing Protection Training</td> <td>31 June 2018</td> <td>Jenderata POM</td> </tr> <tr> <td>LOTO Training</td> <td>20 Feb 2019</td> <td>Jenderata POM</td> </tr> <tr> <td>PPE usage Training</td> <td>23 Jan 2019</td> <td>Jenderata POM</td> </tr> <tr> <td>Fire fighting Training</td> <td>11 April 2019</td> <td>Jenderata POM</td> </tr> <tr> <td>First aid Training</td> <td>27 May 2019</td> <td>Jenderata POM</td> </tr> </tbody> </table> | Training | Date | Remark | Hearing Protection Training | 31 June 2018 | Jenderata POM | LOTO Training | 20 Feb 2019 | Jenderata POM | PPE usage Training | 23 Jan 2019 | Jenderata POM | Fire fighting Training | 11 April 2019 | Jenderata POM | First aid Training | 27 May 2019 | Jenderata POM | Complied |
| Training | Date | Remark | | | | | | | | | | | | | | | | | | | |
| Hearing Protection Training | 31 June 2018 | Jenderata POM | | | | | | | | | | | | | | | | | | | |
| LOTO Training | 20 Feb 2019 | Jenderata POM | | | | | | | | | | | | | | | | | | | |
| PPE usage Training | 23 Jan 2019 | Jenderata POM | | | | | | | | | | | | | | | | | | | |
| Fire fighting Training | 11 April 2019 | Jenderata POM | | | | | | | | | | | | | | | | | | | |
| First aid Training | 27 May 2019 | Jenderata POM | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | | Compliance |
|-----------------------|---|--|---------------|------------------|------------|
| | | HIRARC and OSH briefing | 5 April 2019 | Jendarata estate | |
| | | Policy Training | 18 May 2019 | Jendarata estate | |
| | | First aid Training | 25 April 2019 | Jendarata estate | |
| | | Fire Drill Training | 8 June 2019 | Jendarata estate | |
| | | Pesticide and PPE Training | 16 May 2019 | Jendarata estate | |
| | | Tractor Training driving | 21 May 2019 | Seri Pelangi | |
| | | Spraying technique Training | 30 May 2019 | Seri Pelangi | |
| | | HCV Training | 12 June 2019 | Seri Pelangi | |
| | | Harvesting Training | 24 March 2019 | Seri Pelangi | |
| 4.7.4 | <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>- Major compliance -</p> | <p>At POM, there is a designated OSH Coordinator who is responsible for organising safety training, meetings and investigation and reporting of accidents and Incidents.</p> <p>OSH meeting in Jendarata POM was available conducted quarterly from the record on 27/3/2019 and previously was on 31/12/2018 and 27/9/2018. For Jendarata Estate, conducted on 20 March 2019 from the minute meeting mention 2 accident happen on 24 Jan 2019, the investigation done by management dated 19 Feb 2019 referred PPK no. PK 04/04/390.HIRARC also been reviewed on 1 April 2019. This accident already been claim. The letter to JTK already been sent on 23 May 2019. Previously OSH meeting was on 28 Dec 2018 and 27 Sept 2018.</p> | | | Complied |

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | |
|---|---|-------------------|---------------|------------------|------------|-------------------------------------|-------------------|----------|----------|-------------|--------------|----------------------------------|----------|--------------|--|----------|----------|
| 4.7.5 Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance - | Accident and emergency procedures had been written and briefed to staff, workers, contractors and visitors. Emergency Response Team incorporated under OSH organization chart for 2018. ERT Training schedule 2019 sighted. Workers trained in firefighting, rescue method and prepared for the any unforeseen circumstances. The record was kept by management, In POM sampling on JKPP 8 dated 23 Jan 2019 (JKPP 8/12327/2018). JKPP 6 dated latest record was on 23 march 2019 at Boiler area. | Complied | | | | | | | | | | | | | | | |
| 4.7.6 All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance - | All workers are provided with medical care, and covered by accident insurance. Sampling as per below detail;- <table border="1" data-bbox="1014 767 1868 1126"> <thead> <tr> <th>Workers Id</th> <th>Policy no</th> <th>validity</th> </tr> </thead> <tbody> <tr> <td>AU066708</td> <td>MW258826 under RHB Insurance Berhad</td> <td>Until 24 Aug 2019</td> </tr> <tr> <td>AU245466</td> <td>MW234599</td> <td>15 may 2019</td> </tr> <tr> <td>201900201927</td> <td>8A SOCSO application (236249101)</td> <td>May 2019</td> </tr> <tr> <td>201900309062</td> <td>8A SOCSO application DCT05201900037033</td> <td>May 2019</td> </tr> </tbody> </table> | Workers Id | Policy no | validity | AU066708 | MW258826 under RHB Insurance Berhad | Until 24 Aug 2019 | AU245466 | MW234599 | 15 may 2019 | 201900201927 | 8A SOCSO application (236249101) | May 2019 | 201900309062 | 8A SOCSO application DCT05201900037033 | May 2019 | Complied |
| Workers Id | Policy no | validity | | | | | | | | | | | | | | | |
| AU066708 | MW258826 under RHB Insurance Berhad | Until 24 Aug 2019 | | | | | | | | | | | | | | | |
| AU245466 | MW234599 | 15 may 2019 | | | | | | | | | | | | | | | |
| 201900201927 | 8A SOCSO application (236249101) | May 2019 | | | | | | | | | | | | | | | |
| 201900309062 | 8A SOCSO application DCT05201900037033 | May 2019 | | | | | | | | | | | | | | | |
| 4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance - | Occupational injuries recorded using Lost Time Accident (LTA) metrics. The figure is extracted from monthly safety performance report for Operating Unit. <table border="1" data-bbox="1014 1246 1868 1382"> <thead> <tr> <th>Year</th> <th>Jendarata POM</th> <th>Jendarata Estate</th> <th>Sei Estate</th> <th>Pelangi</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>0.46</td> <td>0.21</td> <td>0</td> <td></td> </tr> </tbody> </table> | Year | Jendarata POM | Jendarata Estate | Sei Estate | Pelangi | 2018 | 0.46 | 0.21 | 0 | | Complied | | | | | |
| Year | Jendarata POM | Jendarata Estate | Sei Estate | Pelangi | | | | | | | | | | | | | |
| 2018 | 0.46 | 0.21 | 0 | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | | | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|--|------|------|------|------------|----------|--------|---------|---------------|---------------|---------|---------------------------------|--------|-----------|---------|------------------|---------|---|------------------|---------|---------------------------|--------|-------------------|---------|-----------------------|---------|------------------------|---------------------|---------|-----------------|---------|----------------------------------|---------|----------|---------|------------------------|---------|------------------|--|----------|
| | | 2019 | 0.25 | 0.18 | 0.58 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.8.1 | A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance - | Training records for employees available and maintained at the office. Records are verified on a sampling basis which covers all aspect of training and RSPO P&C requirement. | | | | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.8.2 | Records of training for each employee shall be maintained. - Minor compliance - | <p>The records of training were available at mill and estate office. Sample training checked:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>19/3/19</td> <td>MSDS Training</td> <td rowspan="4">Jendarata POM</td> </tr> <tr> <td>20/2/19</td> <td>LOTO for operation and workshop</td> </tr> <tr> <td>6/4/19</td> <td>First aid</td> </tr> <tr> <td>24/4/19</td> <td>Biogas operation</td> </tr> <tr> <td>23/1/19</td> <td>PPE Training for operation and workshop</td> <td rowspan="4">Jendarata Estate</td> </tr> <tr> <td>26/1/19</td> <td>Safe harvesting technique</td> </tr> <tr> <td>5/4/19</td> <td>Manuring activity</td> </tr> <tr> <td>16/5/19</td> <td>HCV/Spraying activity</td> </tr> <tr> <td>23/5/19</td> <td>Safe driving technique</td> <td rowspan="5">Seri Pelangi Estate</td> </tr> <tr> <td>15/6/19</td> <td>Policy briefing</td> </tr> <tr> <td>12/6/19</td> <td>Training for HCV and environment</td> </tr> <tr> <td>30/5/19</td> <td>Spraying</td> </tr> <tr> <td>24/3/19</td> <td>Harvesting and pruning</td> </tr> <tr> <td>19/9/18</td> <td>Handling tractor</td> <td></td> </tr> </tbody> </table> | | | | Date | Training | Remark | 19/3/19 | MSDS Training | Jendarata POM | 20/2/19 | LOTO for operation and workshop | 6/4/19 | First aid | 24/4/19 | Biogas operation | 23/1/19 | PPE Training for operation and workshop | Jendarata Estate | 26/1/19 | Safe harvesting technique | 5/4/19 | Manuring activity | 16/5/19 | HCV/Spraying activity | 23/5/19 | Safe driving technique | Seri Pelangi Estate | 15/6/19 | Policy briefing | 12/6/19 | Training for HCV and environment | 30/5/19 | Spraying | 24/3/19 | Harvesting and pruning | 19/9/18 | Handling tractor | | Complied |
| Date | Training | Remark | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 19/3/19 | MSDS Training | Jendarata POM | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 20/2/19 | LOTO for operation and workshop | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6/4/19 | First aid | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 24/4/19 | Biogas operation | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 23/1/19 | PPE Training for operation and workshop | Jendarata Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26/1/19 | Safe harvesting technique | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5/4/19 | Manuring activity | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 16/5/19 | HCV/Spraying activity | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 23/5/19 | Safe driving technique | Seri Pelangi Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 15/6/19 | Policy briefing | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12/6/19 | Training for HCV and environment | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 30/5/19 | Spraying | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 24/3/19 | Harvesting and pruning | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 19/9/18 | Handling tractor | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|------------|
| Principle 5: Environmental responsibility and conservation of natural resources and biodiversity | | | |
| Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement. | | | |
| 5.1.1 | An environmental impact assessment (EIA) shall be documented. - Major compliance - | Environmental Risk Assessment (ERA) was last reviewed on 8/4/2019 for both estate and mill. There were 3 main criteria considered in the assessment i.e. severity, quantity/load, probability. From the assessment, the information about the level of environmental risks were then obtained and it was important to determine the Environmental Action Plan (EAP) later. Verification of the assessment report showed that all activities in the mill and estate that could interact with the environment were assessed | Complied |
| 5.1.2 | Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance - | The mitigations measures were derived from ERA evaluation. Among the sampled activities to verify the methods of mitigation were: <u>ETP:</u> <ul style="list-style-type: none"> • Regular desludging of effluent ponds and disposal to land application furrows • Operation of Biogas plant • Sold to licensed sludge oil buyers • Construction of drains at EFB yard and channel the leachate to effluent pond <u>Boiler:</u> <ul style="list-style-type: none"> • Installed dust collector and smoke density monitoring system • Install flowmeter for exact usage for the mill processing • Plug leakages along pipeline <u>Water Management:</u> <ul style="list-style-type: none"> • Regular desilting of drain programme and maintenance of Watergate, weirs, and pumps • Installation of water pumps • Enhance rain harvesting | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|--|------------|
| | | <u>Replanting</u> <ul style="list-style-type: none"> • Demarcations of buffers prior to felling • Quick establishment of LCC • Inspection of contractor’s excavator, tractor or backhoe <u>Weeding</u> <ul style="list-style-type: none"> • Avoid spraying along the edges of water courses • LCC establishment along drain edges • Reduced usage of chemicals | |
| 5.1.3 | <p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p> | <p>Updating of the progress of plan was carried out by the person in-charge and the results of the monitoring effectiveness were reviewed by the management.</p> | Complied |
| <p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p> | | | |
| 5.2.1 | <p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>- Major compliance -</p> | <p>The HCV assessment for the complex was conducted by WildAsia. Report dated January 2008 was available for verification. The structure of the report generally has the description about methodology used, coverage and the findings on presence of HCV and RTE species.</p> | Complied |
| 5.2.2 | <p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> | <p>Based on the report, there was no HCV or RTE presence in the plantation. Nonetheless, Jenderata Estate has its own self-declared conservation areas which included a Malaysia Tree Park and riparian zones at Sungai Bernam river.</p> | Complied |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|------------|
| 5.2.3 - Major compliance - There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance - | Jendarata complex has conducted its education program on HCV through: <ul style="list-style-type: none"> • A training entitled Riparian reserve and HCV – conducted on 4/5/2019 and attended by 10 participants. • Ongoing briefing in the muster ground for workers with objective to create awareness on company Policy, OSHA Policy, Environment & Biodiversity policy, CSR Policy and Human rights policy • Putting up signage of restriction of hunting, collecting and fishing around the conservation areas | Complied |
| 5.2.5 Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance - | No HCV with existing rights of local communities was identified that needs to be set aside. | Complied |
| Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner. | | |
| 5.3.1 All waste products and sources of pollution shall be identified and documented. - Major compliance - | The wastes products were documented in “Operational Plan to Avoid/Reduce Pollution”. The document has the information about type of waste, source of waste, quantity generated/month and method of disposal. Among the wastes sampled for verification: Major ones for mill: <ul style="list-style-type: none"> • fibre-ffb processing-18% to FFB process - used for boiler fuel • shell- ffb processing-6% to FFB process-used for boiler fuel • EFB- ffb processing-23% to FFB proces • Chemical containers-WTP, boiler- • Spent oil-workshop | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| | | <ul style="list-style-type: none"> Domestic wastes-domestic-2 mt/day (~1,000 population)-landfill <p>Major ones for estate:</p> <ul style="list-style-type: none"> Agrochemical containers-reused for premix, recycling Fertilizer bags-reused for LF collection and weirs bag for water management Clinical wastes Spent lubricants-sent to authorized vendor Domestic wastes-landfill | |
| 5.3.2 | All chemicals and their containers shall be disposed of responsibly. - Major compliance - | Based on the procedure, "Standard Operating Procedure (C) Triple Rinsing Empty Pesticide Containers", dated 26/5/2016, the empty containers must be triple rinsed, punctured and sold to recycler. Sampled: Receipt chit #R179010059-15/6/2019-620 kg of empty chemical drums to Pragash Rao Enterprise | Complied |
| 5.3.3 | A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance - | On-site verification showed that all the disposal of wastes was well managed. Among the records/practice verified: <ul style="list-style-type: none"> Disposal for SW 409 – 6th Sch available last disposal on 11/6/2019 to Kenep Waste Management Sdn Bhd, 0.11 mt, consignment note: 2019061308VE4YHS Disposal for SW 305 – 6th Sch available-last disposed on 15/6/2019 to Primochem Sdn Bhd, 0.34mt, consignment note: 2019061518OWTFNU Disposal for SW404 – 6th schedule available, last disposal on 18/2/19 to Kualiti Alam Sdn Bhd, 0.001mt, consignment note 2019021812GNIES6 Disposal of domestic wastes – landfill Disposal of recyclable wastes: <ul style="list-style-type: none"> - Receipt chit #R179010059-15/6/2019-620 kg of empty chemical drums to Pragash Rao Enterprise | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|---|------------|
| | | - Receipt chit #R179010058-10/6/19-360 kg of inner empty plastic bags to Pragash Rao Enterprise | |
| Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised. | | | |
| 5.4.1 | A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance - | Jendarata complex continued to monitor its diesel consumption and records were documented. The biogas plant which generates electricity to supply to the national grid has helped the CU to improve the efficiency of fossil fuel consumption. Apart from that, regular maintenance of machinery and continuous education to machines operators have also contributed the efficient consumption of fossil fuel. In 2018 the consumption was 0.38 lt/mt FFB. | Complied |
| Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice. | | | |
| 5.5.1 | There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance - | No fire was used for preparation of land. Verification on the latest replanting fields confirmed that no trace of open burning observed. | Complied |
| 5.5.2 | Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance - | Not applicable as no fire was used for land preparation. | Complied |
| Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored. | | | |
| 5.6.1 | An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). | Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission. As | Complied |

| Criterion / Indicator | Assessment Findings | Compliance | |
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| - Major compliance - | <p>prescribed under DOE’s Compliance Schedule, the mill is obliged to conduct stack sampling twice a year. Below are the verified reports:</p> <p>- dated 21/11/2018: Stack 7 for boiler 2 = 129mg/m³, (ref.: report no.: RT033/2018/105)</p> <p>In the same samplings, gas such as NO, NO₂, SO₂, CO₂, CO, O₂ were also tested using gas analyser.</p> <p>Dark smoke emissions were monitored through Continuous Emissions Monitoring System (CEMS) which link to the DOE on real-time basis</p> | | |
| 5.6.2 | <p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented.</p> <p>- Major compliance</p> | <p>The emissions of GHG had been identified through the ERA. Among the identified sources of emission were mill effluent, fossil fuel consumption, peat oxidation and fertilisers consumption to name a few. Various initiatives were implemented to minimise the emission such as bio-gas plant (commissioned since 2010), improvement in fossil fuel consumption and maintaining the water table at peat areas.</p> | Complied |
| 5.6.3 | <p>A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.</p> <p>- Minor compliance -</p> | <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 is used and the management opted for full version was applied.</p> <p>These GHG calculations were done as per certification unit basics including estates, mill & outgrower.</p> | Complied |
| <p>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</p> | | | |
| <p>Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p> | | | |
| 6.1.1 | <p>A social impact assessment (SIA) including records of meetings shall be documented.</p> <p>- Major compliance -</p> | <p>The Social Impact Assessment (SIA) for Jendarata POM & Jendarata Estate has covered the access and use rights, economics livelihoods and working conditions, subsistence activities/amenities, human rights, cultural and religious values, medical & health facilities, education facilities and operational activities. There are social impacts</p> | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|---|------------|
| | | management plan and social impacts review plan published according to the topics discussed. | |
| 6.1.2 | There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance - | The annual stakeholder meeting has been conducted to updates the SIA. The last stakeholder meeting sample sighted for Jendarata POM was on 10.04.2019, Jendarata Estate on 29.04.2019 and Seri Pelangi Estate on 18.04.2019 for joint consultation on SIA. Attendance list with signature sighted. | Complied |
| 6.1.3 | Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance - | The actions plan for year 2019 had included the mitigation of negative impacts and the promotions on positive impacts. Examples sighted are: 1. Human Rights (Respect reproductive rights). Impacts: positive. Significance: Low. Action plan: Gender committee meeting held regularly. Review on 10 th April 2019. 2. Operational activities (Confined in a room). Impacts: positive. Significance: Negligible. Action plan: weighbridge is air-conditioned. Review on 10 th April 2019. | Complied |
| 6.1.4 | The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance - | Social Impacts Review Plan and Social Impacts Management Plan for respective mill and estates are established based on the SIA. The plans are reviewed on annually basis and for this year, already reviewed on 10 th April 2019. Sample sighted at the mill and Seri Pelangi Estate for year 2019 has been completed. | Complied |
| 6.1.5 | Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance - | There is no smallholder included in this certification. | Complied |
| Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties. | | | |

| Criterion / Indicator | Assessment Findings | Compliance | |
|-----------------------|---|--|----------|
| 6.2.1 | <p>Consultation and communication procedures shall be documented.</p> <p>- Major compliance -</p> | <p>The Grievance Redressal Procedure is established to address any form of communication and consultation for both the external and internal stakeholders.</p> | Complied |
| 6.2.2 | <p>A management official responsible for these issues shall be nominated.</p> <p>- Minor compliance -</p> | <p>SOP for responding constructively to stakeholder requests for information, including a specific timeframe to respond to enquiries has established and documented.</p> <p>Stakeholder booklet has defined the process of handling request / response / complaints / grievance. Specific timeframe to respond is within 7 days.</p> <p>For RSPO P&C & SCC, the person responsible for communication with the local external stakeholders is Mr P. Rajasegaran as per appointment letter dated 15th February 2019 signed by Group Manager, Human Resources and Environment, Safety & Health for Jendarata POM, Mr C. Mohan Das for Jendarata Estate as per appointment letter dated 29th March 2018 signed by Chief Executive Director and Mr Khor Boon Wah for Seri Pelangi Estate as per appointment letter dated 29th March 2018 signed by Chief Executive Director.</p> <p>Records of communication with stakeholders mainly are related to request for support. The records are kept at respective business units.</p> | Complied |
| 6.2.3 | <p>A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.</p> <p>- Minor compliance -</p> | <p>The stakeholder list sighted for this assessment are the Jendarata POM stakeholder list 2019 and Seri Pelangi Estate 2019 which includes Guest workers, NGOs, Government agencies, Schools and internal local community.</p> <p>The annual stakeholder meeting has been conducted to updates the SIA. The last stakeholder meeting sample sighted for Jendarata POM was on 10.04.2019, Jendarata Estate on 29.04.2019 and Seri Pelangi Estate on 18.04.2019 for joint consultation on SIA. Attendance list with signature sighted.</p> | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|---|------------|
| | | The Stakeholder Handbook and the employee handbook distributed contains the method and procedure for information request. Interview with the stakeholders confirmed that they received the handbook. | |
| Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties. | | | |
| 6.3.1 | The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance - | <p>Jendarata Business Unit have maintained "Grievance Redressal Procedure for External Stakeholder" and "Grievance Redressal Procedure Internal Stakeholder" to address any grievances or communication with the affected stakeholders.</p> <p>UP has also established the Whistleblower Policy dated 02/05/2017 undersigned by Chief Executive Director.</p> <p>The procedure and policy has been printed in Stakeholder Handbook and Worker Handbook. The handbooks are distributed to all the stakeholders.</p> <p>The procedure and policy is also available in the UP webpage http://unitedplantations.com/sustainability/pdf/Whistleblower%20Policy.pdf http://unitedplantations.com/sustainability/community_grievance_redressal.asp</p> <p>Interviewed with the relevant stakeholders confirmed that the booklet was distributed to them. The stakeholders were able to inform the auditor regarding the content of the booklet.</p> | Complied |
| 6.3.2 | Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance - | The grievances raised are mainly for housing repairs. Any grievances raised internally are recorded in log books. The resolution of the housing repairs had met the required 23 days' timeline. | Complied |
| Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. | | | |

| Criterion / Indicator | Assessment Findings | Compliance |
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| <p>6.4.1 A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -</p> | <p>There is no customary land for the certification unit. Lands for this certification are with proper land titles and the legal ownership belongs to United Plantations Berhad. All the land titles are with term of Commercial crops or with no specific terms. The quite rent has been verified to confirmed UP has the user rights to the lands.</p> <p>There was no land dispute case been reported in Jendarata Estate since the last assessment. All the lands were legally own by United Plantations Berhad. Interviewed conducted with the stakeholders confirmed that no encroachment of land by United Plantations Berhad. The management has maintained trenches to demarcate the ownership of the lands as well as legal boundary stones were maintained.</p> <p>UP has also continued to allowed local communities to access to religious facilities within the plantations.</p> <p>However, United Plantations Berhad has established SOP for Land Dispute Settlement as per Free Prior & Informed Consent (FPIC). The procedure was distributed into 3 stages where phase 1 is the process of verification and completing documents of community, phase 2 is the verification process of land legality and last phase is the negotiation process with land owner.</p> | <p>Complied</p> |
| <p>6.4.2 A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and</p> | <p>There is no compensation required for this certification due to no loss of land or user rights.</p> | <p>Complied</p> |

| Criterion / Indicator | Assessment Findings | Compliance |
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| | differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance - | |
| 6.4.3 | The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance - | Complied |
| Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages. | | |
| 6.5.1 | Documentation of pay and conditions shall be available. - Major compliance - | The sampled workers had able to achieve the minimum salary. The minimum salary was achieved base on the normal work hours. During the interview with workers, it was made know to the assessment team that the target set by the company are realistic and able to be completed. For harvester (one type of the piece rated work), as per the MAPA/NUPW agreement, piece rate workers are not subjected to minimum wage. Samples of worker's pay slip for month of January, March and May 2019 as below: 1. Jendarata POM: Yeasin Sheikh (30189) 2. Jendarata POM: Gunj Bahadur Khadka (30373) 3. Jendarata POM: Md Mahabubul (30492) 4. Jendarata POM: Tinesa A/L Subrumanium (30495) 5. Jendarata POM: Sulton (30505) 6. Jendarata Estate: Eswaran Paramasivan (501619) 7. Jendarata Estate: Amzad Hossain (219860) 8. Jendarata Estate: Taepur (Contractor: Subramanium) 9. Jendarata Estate: Nagaraj Velu (Contractor: Armada Semarak) 10. Jendarata Estate: Yohanes Atitus (Contractor: We Tiew Kuang) 11. Seri Pelangi Estate: Binya Kahar (105871) |

| Criterion / Indicator | Assessment Findings | Compliance |
|--|--|------------|
| | 12. Seri Pelangi Estate: Manikandan (106791) 13. Seri Pelangi Estate: Md Nasir Sheikh (106629) 14. Seri Pelangi Estate: Dandi Firmansyah (Contractor: Xing Lai) 15. Seri Pelangi Estate: Mustike (Contractor: Chin CTR) | |
| 6.5.2 Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance - | Employment contract are available in their hometown language with adherence to the current minimum wage order 2018. Sampled below workers: 1. Jendarata POM: Yeasin Sheikh (30189) 2. Jendarata POM: Gunj Bahadur Khadka (30373) 3. Jendarata POM: Md Mahabubul (30492) 4. Jendarata POM: Tinesa A/L Subrumaniam (30495) 5. Jendarata POM: Sulton (30505) 6. Jendarata Estate: Eswaran Paramasivan (501619) 7. Jendarata Estate: Amzad Hossain (219860) 8. Jendarata Estate: Taepur (Contractor: Subramaniam) 9. Jendarata Estate: Nagaraj Velu (Contractor: Armada Semarak) 10. Jendarata Estate: Yohanes Atitus (Contractor: We Tiew Kuang) 11. Seri Pelangi Estate: Binya Kahar (105871) 12. Seri Pelangi Estate: Manikandan (106791) 13. Seri Pelangi Estate: Md Nasir Sheikh (106629) 14. Seri Pelangi Estate: Dandi Firmansyah (Contractor: Xing Lai) 15. Seri Pelangi Estate: Mustike (Contractor: Chin CTR) | Complied |
| 6.5.3 Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance - | Both foreign workers and local workers are provided with housing facilities. Water are provided for subsidize rate to the workers. Workers are also able to access to free medication. Other public facilities including community hall, religious place are provided by UP. Hospital Assistant made the housing inspection by weekly basis and records are sighted. | Complied |

| Criterion / Indicator | Assessment Findings | Compliance | |
|---|--|--|-----------------|
| 6.5.4 | <p>Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p> | <p>Jendarata is located near to Hutan Melintang town while Seri Pelangi Estate is near to Teluk Intan Town. Workers can access easily to the town. Additionally, there are shops available within the Jendarata Estate while Seri Pelangi Estate is located adjacent to the main road for workers to buy grocery.</p> | <p>Complied</p> |
| <p>Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p> | | | |
| 6.6.1 | <p>A published statement in local languages recognising freedom of association shall be available.</p> <p>- Major compliance -</p> | <p>The commitment of UP Bhd toward freedom of association is stated in the Human Rights Policy undersigned by UP Bhd Chief Executive Director on 18/08/2017.</p> <p>Interview conducted with workers that joined the Union confirmed they understood the term of the collective agreement. A copy of the agreement is available at the mill and estate for the reference of the workers.</p> <p>The Human Rights policy has been disseminated to the workers through the workers' handbook while to the external parties through Stakeholder Handbook and published at the UP webpage: http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf</p> <p>The list of workers that joined the Union is available in both Jendarata Mill, Jendarata Estate and Seri Pelangi Estate.</p> <p>In the POM, workers were allowed to join Guest Worker Committee or NUPW. Appropriate deduction was made correctly.</p> <p>Interviewed with the workers found no evidence that UP is restriction their workers to join/form any union.</p> | <p>Complied</p> |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|--|------------|
| 6.6.2 | Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance - | Once every 2 months, meeting with the worker’s representative will be conducted. The last meeting conducted at the mill was on 11/05/2019 and 28/03/2019 (Jendarata POM), 25/4/2019 & 14/02/2019 (Jendarata Estate) and 13/06/2019, 25.04.2019 & 26.02.2019 (Seri Pelangi Estate). The concerns raised by the workers are mainly on housing maintenance and road repairs. No other critical issue raised. This is confirmed through the stakeholder’s consultation by Auditor on 18-19.06.2019 at Jendarata Estate and Seri Pelangi Estate. | Complied |
| Criterion 6.7: Children are not employed or exploited. | | | |
| 6.7.1 | There shall be documentary evidence that minimum age requirements are met. - Major compliance - | The commitment of UP Bhd toward no child labour is stated in the Human Rights Policy undersigned by UP Bhd Chief Executive Director on 18/08/2017. The Human Rights policy has been disseminated to the workers through the workers’ handbook while to the external parties through Stakeholder Handbook and published at the UP webpage: http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf The Master worker list of Contractor’s workers and UP checkroll workers confirmed al employees are above 18 years old. Interviewed with the workers on field confirmed that no workers below 18 years old were observed working in United Plantations Berhad. | Complied |
| Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited. | | | |
| 6.8.1 | A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance - | The commitment of UP Bhd toward equal opportunity is stated in the Human Rights Policy undersigned by UP Bhd Chief Executive Director on 18/08/2017. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|---|------------|
| | | The Human Rights policy has been disseminated to the workers through the workers' handbook while to the external parties through Stakeholder Handbook and published at the UP webpage: http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf . | |
| 6.8.2 | Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance - | Interview with local workers and migrant workers shows no discrimination. Interview feedback from workers shows they are happy with the management. There is no complaint that the company is discriminating any worker. Salary payment reviewed did not show any discrimination between female and male workers. Migrant workers had received the same treatment and benefits as per the local workers. Housing facilities provided to the migrant workers are equivalent to the local workers. | Complied |
| 6.8.3 | It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance - | For local workers, evidence on job vacancies detailing the academic requirements and work experiences. For migrant workers, the selection of workers for hiring was based on interviews at their local country. Due to the country requirement, any migrant workers coming to Malaysia is required to go through FOMENA testing. As this is the requirement set by the government, it is not any form of discrimination for not taking migrant workers due to unfair conditions. | Complied |
| Criterion 6.9: | | | |
| There is no harassment or abuse in the work place, and reproductive rights are protected. | | | |
| 6.9.1 | Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance - | The commitment of UP Bhd toward preventing sexual harassment is stated in the Gender Policy undersigned by UP Bhd Chief Executive Director on 24/04/2015. The Gender Policy has been disseminated to the workers through the workers' handbook while to the external parties through Stakeholder Handbook and published at the UP webpage: http://unitedplantations.com/sustainability/pdf/Gender%20Policy.pdf During interview with workers especially female workers, there is not any report on sexual and any other forms of harassment. | Complied |

| Criterion / Indicator | Assessment Findings | Compliance |
|--|--|------------|
| 6.9.2 | <p>A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.</p> <p>- Major compliance -</p> | Complied |
| 6.9.3 | <p>A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p> | Complied |
| <p>Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.</p> | | |
| 6.10.1 | <p>Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.</p> <p>- Minor compliance -</p> | Complied |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|--|------------|
| 6.10.2 Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance - | This certification unit does not purchase any FFBs from out growers or independent smallholders. | Complied |
| 6.10.3 Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance - | This certification unit does not purchase any FFBs from out growers or independent smallholders. | Complied |
| 6.10.4 Agreed payments shall be made in a timely manner. - Minor compliance - | This certification unit does not purchase any FFBs from out growers or independent smallholders. | Complied |
| Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate. | | |
| 6.11.1 Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance – | Estate management have made contribution to the internal and external stakeholders. As seen in Annual Report 2018 book, for the whole group, United Plantation has the actual amount as below: <ol style="list-style-type: none"> 1. Hospital & medicine for employee’s, dependents and nearby communities RM 2,424,918 2. Retirement benevolent fund RM 531,338 3. Education, welfare, scholarships & others RM 298,841 4. Bus subsidy for school children RM 206,377 5. External donations RM 127,359 The company is contributing to local development based on official request. Example of request: <ol style="list-style-type: none"> 1. Application for financial assistance for further studies from Ms Tharani on 12.03.2018. UP has approved for a scholarship of RM200/month from 01.03.2018 – 31.10.2020. 2. Application for financial assistance for further studies from Ms Pavitra on 07.02.2018. UP has approved for a scholarship of RM200/month from 01.02.2018 – 31.01.2020. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|--|------------|
| | | 3. Jendarata Group Hospital and Dispensary – provides in & outpatient facilities for the employees. Additional new mechanical beds in Jendarata Group Hospital (RM 33,000) and enhancement in ambulance service (RM 90.373). | |
| 6.11.2 | Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance – | Not applicable as there was no scheme smallholders involved in the certification unit. | Complied |
| Criterion 6.12: No forms of forced or trafficked labour are used. | | | |
| 6.12.1 | There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance - | <p>The commitment of UP Bhd toward no forced or trafficked labour is stated in the Human Rights Policy undersigned by UP Bhd Chief Executive Director on 18/08/2017.</p> <p>The Human Rights policy has been disseminated to the workers through the workers’ handbook while to the external parties through Stakeholder Handbook and published at the UP webpage: http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf</p> <p>Workers are free to move around especially for the foreign workers. Although the workers have voluntary to surrender their passport for safe keeping, the workers are able to access to their passport at any time required. UP had built special lockers which keys are kept by the workers.</p> <p>Interview with workers confirmed that there is no restriction of moment and no restriction to obtain their passport.</p> | Complied |
| 6.12.2 | Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance – | UP conducts its migrant workers hiring by itself. When there is needs to hire, UP will go to the country of origin to inform and select the potential workers. Interview with workers confirmed that they knew that when they arrive to Malaysia, they will be working in the palm oil company. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|--|------------|
| | | <p>In the labor supplier contract, UP had communicated to their contractors that any workers they send to work in UP, they shall have all the necessary legal document. In the agreement between UP and the contractor, the contractor agrees that they will respects Human Rights and the Guest Workers Policies (Contract between UP and Subramaniam a/I Naganaidu dated 4/2/2019).</p> <p>The contract agreement provided by UP to the labour agent was reviewed and confirmed that the agreement that was provided to the migrant workers are stating that they will be working in the plantations. Interview with the foreign workers confirmed that they knew they will be working in plantations upon arriving in Malaysia.</p> | |
| 6.12.3 | <p>Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented.</p> <p>- Major compliance -</p> | <p>The Guest Workers Policy has been established on 07/08/2014 undersigned by the Chief Executive Director.</p> <p>The Guest Workers Policy has been disseminated to the workers through the workers' handbook while to the external parties through Stakeholder Handbook and published at the UP webpage: http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf</p> | Complied |
| <p>Criterion 6.13: Growers and millers respect human rights.</p> | | | |
| 6.13.1 | <p>A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1).</p> <p>- Major compliance -</p> | <p>The commitment of UP Bhd toward Human Rights is stated in the Human Rights Policy undersigned by UP Bhd Chief Executive Director on 18/08/2017.</p> <p>Interview conducted with workers that joined the Union confirmed they understood the term of the collective agreement. A copy of the agreement is available at the mill and estate for the reference of the workers.</p> | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|---|----------------|
| | | The Human Rights policy has been disseminated to the workers through the workers' handbook while to the external parties through Stakeholder Handbook and published at the UP webpage: http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf | |
| 6.13.2 | As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. | Not applicable in Peninsular Malaysia. | Not applicable |
| Principle 7: Responsible development of new plantings (if applicable) | | | |
| No new planting at UP Plantations Bhd – Jendarata Certification Unit | | | |
| Principle 8: Commitment to continual improvement in key areas of activity | | | |
| Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations. | | | |

| Criterion / Indicator | Assessment Findings | Compliance |
|--|--|-----------------|
| <p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); • Optimising the yield of the supply base. <p>- Major compliance -</p> | <p>The improvement plans were incorporated into the respective criterion. Please refer to the respecte criteria of assessment outcome.</p> | <p>Complied</p> |

Appendix B: Approved Time Bound Plan

PT Surya Sawit Sejati (PT SSS) is located in Pangkalan Bun, Kotawaringin Barat District, Central Kalimantan Province and was purchased by this company (United Plantations Berhad) early 2007. At the time of purchase PT SSS had approvals and possession of HGU no 42 (Land Title) for 2,508.472 ha issued by the National Land Authority/BPN Kotawaringin Barat on 9 August 2005 and the remaining of \pm 13,000 ha had been further processed application of HGU – in 2007 up to the Cadastral (Land Office Boundary Confirmation) ref.113.540.42.2007. The Land Boundary Confirmation was based on Spatial Management Plan (RTRWP 2003) for Central Kalimantan Province, which mapped and designated this area as non-forest land (KKP -Kawasan Pengembangan Produksi and KPPL-Kawasan Pemukiman dan Penggunaan Lain).

In 2008, PT SSS received a letter from the National Land Authority (BPN-Badan Pertanahan Nasional) that the process for application of HGU of \pm 13,000 ha was postponed as a result of the forest land release (Izin Pelepasan Kawasan Hutan) issued by the Ministry of Forestry (Reference Letter No.800.540.42 dated September 2008) due to the discrepancy between RTRWP 2003 and TGHK (Tata Guna Hutan Kesepakatan) 1982, which is prevalent in Kalimantan Tengah. As per TGHK 1982, PT SSS's land was partially in the forest zone area.

PT SSS accordingly submitted an application for land release (Izin Pelepasan) since 5 June 2009 based on PP no 10 year of 2010. Unfortunately the process in securing the required land release documents were held back due to ongoing uncertainties by the Local and Central Government on whether to follow RTRWP 2003 or TGHK 1982 and also the fact that there was No Bupati of Kalimantan Barat District until the end of 2011, hence bringing all decisions to a standstill.

With the appointment of the new Bupati towards end 2011, the process of PT SSS's land release was completed and submitted to the Forestry Ministry. However in April 2012, PT SSS received a letter from the Ministry of Forestry stating the application for forest release would be postponed until the "harmonization process" of the zoning map based on RTRWP 2003 with the new forestry map of 2011 (changing TGHK 1982 map) had been completed pending the amendment of the "Peraturan Pemerintah No.10, 2010" concerning converting the forest zone use and functions according to the Director of General Planology, Forestry Ministry No.S.431/V11-KLH/2012, dated 19th April 2012.

On 6th July 2012 The President of The Republic of Indonesia issued the amendment of the Peraturan Pemerintah No.10 year 2010, namely Peraturan Pemerintah No.60 year 2012.

From the flow chart of PP No 60 of 2012, any company affected by the "harmonization process" has to go back to the drawing board and initiate the forest release application according to the new regulation.

In this respect, PT SSS has successfully obtained the Pelepasan Decree from the Investment Coordinating Board on behalf of the Environment and Forestry Minister for 5,122.73 ha on 20 March 2015. For this 5,122.73 ha, HGU application shall be able to proceed to BPN. However, the 4,717.03 ha of HP area are still in the process of Land Swap under the PP no 60 year 2012.

Meanwhile, PT SSS's application for land release of 1,769.61 ha of land in the forest zone from its original HGU area of 2,508.47 was not supported by the Land Office, as the Land Office is of the opinion that once HGU is approved (as under KPP/KPPL in RTRWP 2003) there is no necessity to apply for land release, very much contrary to the Ministry of Forestry's stand. PT SSS had envisaged to certify this 2,508.47 ha of HGU area in its Lada Estate in Q4 of 2016 as per its time bound plan. However due to the difference in opinions between the Land Office and the Ministry of Forestry, which of late has surfaced, PT SSS has to postpone its time bound plan.

The President of The Republic of Indonesia issued Peraturan Pemerintah 104, 2015 dated 28 Dec 2015 and made available to the public in early 2016 a new protocol for the "harmonization process" replacing PP 60/2012. This will prolong the process of 4,717.03 ha of HP area Land Swap; as the re application has been submitted by 17 February 2016 to the Forestry Department. PT SSS is in the process now submitting all documents for its 1769.61ha (from its original HGU) to the Investment Coordinating Board/ Badan Koordinasi Penanaman Modal/BKPM. PTSSS has

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appeared for RSPO Main Assessment for the initial HGU clean and clear of 713.47ha on 11th to 14th December 2017 and successfully obtained the RSPO certificate in November 2018.

The Company had proposed in its time bound plan to seek certification in 4th quarter of 2017 and 2018 for Lada and Runtu Estate on the clean and clear HGU portion and the area where Panitia B (final step before issuance of HGU) had been completed. However on 12th October 2017, the RSPO Statement on Hak Guna Usaha (HGU) - Indonesia has stated: RSPO grower members that are not certified and want to apply for RSPO certification, must show evidence of possession of a legitimate Hak Guna Usaha (HGU) and Izin Usaha Perkebunan (IUP) for the intended unit of certification.

We are now pleased to inform that the long overdue HGU for 6004.15 ha was received on 12th March 2018. This portion will go in for extension of scope audit soon. The other portion pending HGU are in the land swap phase and its HGU issuance is beyond our control. We anticipate to conduct Scope Extension Audit concurrently with RSPO ASA 1 in PTSSS (Existing HGU area of 713.47 ha and newly HGU acquired area of 6004.15 ha) in 3rd quarter of 2019.

The Company in view of several sudden and unexpected changes in legislation and laws by the authorities, combined with deferring views between the National and Regional bodies in terms of land tenure and designation as explained in detail as above and the recent RSPO Statement on HGU which is totally beyond its control is now compelled to defer its time bound plan.

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2018 for Jendarata Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in 2018 for Jendarata Palm Oil Mill and supply base are as following:

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | 1.89 |
| PK | 1.89 |

| Extraction | % |
|------------|-------|
| OER | 22.23 |
| KER | 5.38 |

| Production | t/yr |
|--------------|-----------|
| FFB Process | 134079.00 |
| CPO Produced | 29805.00 |
| PKO Produced | 7214 |

| Land Use | Ha |
|-----------------------------|----------------|
| OP Planted Area | 5770.04 |
| OP Planted on peat | 852.96 |
| Conservation (forested) | 0 |
| Conservation (non-forested) | 0 |
| Total | 6623.00 |

Summary of Field Emission and Sink

| | Own Crop* | | Group | | 3 rd Party | | Total | |
|--|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
| | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB |
| Emission | | | | | | | | |
| Land Conversion | 65908.43 | 0.39 | 0 | 0 | 0 | 0 | 65908.43 | 0.39 |
| CO ₂ Emission from fertilizer | 7202.17 | 0.08 | 0 | 0 | 0 | 0 | 7202.17 | 0.08 |
| NO ₂ Emmision | 10524.86 | 0.07 | 0 | 0 | 0 | 0 | 10524.86 | 0.07 |
| Fuel Consumption | 2602.59 | 0.01 | 0 | 0 | 0 | 0 | 2602.59 | 0.01 |
| Peat Oxidation | 46600.11 | 0.23 | 0 | 0 | 0 | 0 | 46600.11 | 0.23 |
| Sink | | | | | | | | |
| Crop Sequestration | -62543.39 | -0.44 | 0 | 0 | 0 | 0 | -62543.39 | -0.44 |
| Conservation Sequestration | 0 | -0.07 | 0 | 0 | 0 | 0 | 0 | -0.07 |
| Total | 70294.77 | 0.28 | 0 | 0 | 0 | 0 | 70294.77 | 0.28 |

Summary of Mill Emission and Credit

| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 1895.65 | 0.01 |
| Fuel Consumption | 188.66 | 0 |
| Grid Electricity Utilisation | 0 | 0 |
| Credit | | |
| Export of Grid Electricity | -2495.81 | -0.02 |
| Sales of PKS | 0 | 0 |
| Sales of EFB | 0 | 0 |
| Total | -411.50 | 0 |

Summary of Kernel Crusher Emission and Credit (if applicable)

| Emissions | tCO ₂ e |
|--------------------------------|--------------------|
| PK from own mill | 13618.36 |
| PK from other source | 0 |
| Fuel Consumptions | 0 |
| Total Crusher emissions | 0 |

*This mill has no kernel crusher operation.

| Palm Oil Mill Effluent (POME) Treatment: | |
|---|-----|
| Divert to Compost (%) | 0 |
| Divert to anaerobic diversion (%) | 100 |

| POME Diverted to Anaerobic Digestion: | |
|--|-----|
| Divert to anaerobic pond (%) | 0 |
| Divert to methane captured (flaring) (%) | 0 |
| Divert to methane captured (energy generation) (%) | 100 |

Appendix D: General Chain of Custody Requirements for the Supply Chain

| 5.1 Applicability of the general chain of custody requirements for the supply chain | | | |
|--|---|---|--|
| | Requirement | Evidence For any N/A raised, justification is required. | Compliance (Yes / No or N/A) |
| 5.1.1 | The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification. | Jenderata POM takes the legal ownership and physically handles RSPO certified FFB from the estates and produce CPO and PK. The RSPO SCC SOP (Module D-CPO Mills: IP) has been revised with the new standard June 2017, SOP Revision 07, dated 15.02.2019 | Yes |
| 5.1.2 | Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model. | Jenderata POM is not receiving the FFB from traders or distributor and itself not at trader or distributor, therefore no license required. | Yes |
| 5.1.3 | Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform. | The Palmtrace ID for Jenderata POM: RSPO_PO1000000238. | Yes |
| 5.1.4 | Processing aids do not need to be included within an organization’s scope of certification. | This is not refinery, therefore no processing aids is included. | N/A |
| 5.2 Supply chain model | | | |
| 5.2.1 | The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance. | UP Jenderata POM is using the IP supply chain model since it receives the FFB from own estates. The downgrading procedure from IP to SG is available as per The SOP (Module D-CPO Mills: IP). | Yes |

| | | | |
|-----------------------------------|--|--|-----|
| | | For buyer who doesn't require RSPO certified CPO or PK, downgrading can be done from certified material to non-certified material. | |
| 5.2.2 | The site can use one (1) or a combination of supply chain models as audited and certified by the CB. | UP Jenderata POM is using IP supply chain model since it receive the FFB from own estates. | Yes |
| 5.3. Documented Procedures | | | |
| 5.3.1 | The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: | The RSPO SCC SOP (Module D-CPO Mills: IP) has been revised with the new standard June 2017, SOP Revision 07, dated 15.02.2019. | Yes |
| | <ul style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. | | |
| | <ul style="list-style-type: none"> Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). | The SCC training has been conducted on 22.02.2019 on the SOP Oil Mill SCC Module D, attended by 14 attendants from various position such as clerk, weighbridge, laboratory assistant, etc. Further records verified as per 5.4.1 and 5.6.1. | Yes |
| | <ul style="list-style-type: none"> Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard. | The person having overall responsibility for and authority over the implementation is Head of Oil Mill as per letter of appointment on 15 th February 2019 to Mr P. Rajasegaran (Group Engineer, Downriver Jenderata Engineering Department). | Yes |
| 5.3.2 | The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. | The SOP (Module D-CPO Mills:IP) no 15: has the Internal Audit Procedures as well as SOP for Internal Audit where the SCCS audit shall be conducted at least annually. The internal audits shall cover and conform to the requirements in the MSPO and RSPO Supply Chain Certification Standard and ensure any claims regarding the use of RSPO certified oil palm products are in compliance with the RSPO Market Communications and Claims Documents. | Yes |

| | | | |
|-------------------------------------|---|--|-----|
| | ii) effectively implements and maintains the standard requirements within its organization | Internal audit minutes of meeting, part B: Compliance with RSPO SCCS 2017-POM conducted by HRESH team on 05 th April 2019. | Yes |
| 5.4. Purchasing and goods in | | | |
| 5.4.1 | <p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number | <p>Jendarata POM have the documented procedures from receiving of certified FFBS to processing and finally dispatches of RSPO certified CPO and RSPO certified PK as per SOP (Module D-CPO Mills; Identity Preserved), date issued 15/2/2019, Revision no 7.</p> <p>Jendarata POM has the complete records on the tonnage and sources of certified FFBS received.</p> <p>Sample seen: Delivery note of FFBS sourced from own certified supply base (certified to the RSPO P&C): FFB despatch report No: 69694 Dated:29/3/2019 Estate: Jendarata Estate Field: 47, 40, 53, 59, 58 supply chain certificate no: RSPO 693200</p> <p>FFB despatch report No: 6041 Dated:29/3/19 Estate: Seri Pelangi Estate supply chain certificate no: RSPO 693200</p> | Yes |
| | <ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). | Information presented in document such as delivery note as sampled in 5.4.1. | Yes |

| | | | |
|------------------------------------|--|---|-----|
| | <ul style="list-style-type: none"> The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance. | The site has ensured that the FFB & PK are certified based on the source of FFB. The certified FFB & PK only come from their own estate, which was from Jendarata estate and Seri Pelangi Estate. | Yes |
| | <ul style="list-style-type: none"> A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. | The site does not need to check the certificate validity of the FFB source, because the source were from own estate. | Yes |
| | <ul style="list-style-type: none"> The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. | The site has never purchased any certified FFB from traders or distributors. | Yes |
| 5.4.2 | The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents. | The company was only process certified fruits from its own estate. At the moment all the estates (Jendarata and Seri Pelangi) are certified. | Yes |
| 5.5. Outsourcing activities | | | |
| 5.5.1 | <p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank</p> | There was no outsourcing activity in Jenderata POM. | Yes |

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| | movements are controlled by the certified organization (not the tank farm manager). | | |
| 5.5.2 | Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a. The site has legal ownership of all input material to be included in outsourced processes; | There was no outsourcing activity in Jenderata POM. | Yes |
| | b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. | There was no outsourcing activity in Jenderata POM. | Yes |
| | c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. | There was no outsourcing activity in Jenderata POM. | Yes |
| | d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance. | There was no outsourcing activity in Jenderata POM. | Yes |
| 5.5.3 | The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products. | There was no outsourcing activity in Jenderata POM. | Yes |
| 5.5.4 | The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products. | There was no outsourcing activity in Jenderata POM. | Yes |
| 5.6. Sales and goods out | | | |

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| 5.6.1 | <p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number | <p>Jendarata POM has the complete records on the tonnage and sources of certified CPO and PK solds</p> <p>Sample seen:</p> <ol style="list-style-type: none"> 1. Weighbridge chit no: 97386, date 15/3/19, vehicle no: AGJ9182, customer: XXXXX, PK (SG), Nett weight 23570 kg, certificate no: RSPO 693200 2. Weighbridge chit no: 1210, date 7/3/2019, type of transport: direct pumping, customer: XXXXX, CPO (IP), Nett weight 125.48 kg, certificate no: RSPO 693200 3. Weighbridge chit no: 1207, date 2/3/2019, type of transport: direct pumping, customer: XXXXX, CPO (IP), Nett weight 119.68 kg, certificate no: RSPO 693200 | Yes |
| | <ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). | <p>Information is presented in the sales & goods out document, such as weighbridge tickets.</p> | Yes |
| | <ul style="list-style-type: none"> • For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. | <p>Jendarata POM has registered all of their transaction including Shipping Announcement and Stock Allocation in RSPO IT Platform (PalmTrace).</p> | Yes |
| 5.7. Registration of transactions | | | |
| 5.7.1 | <p>Supply chain actors who:</p> <ul style="list-style-type: none"> • are mills, traders, crushers and refineries and; • take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme | <p>The site is a Palm Oil Mill which takes legal ownership and physically handle RSPO certified sustainable oil palm product, has registered their transaction in RSPO IT Platform (PalmTrace).</p> | Yes |

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| | of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. | | |
| 5.7.2 | The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. | RSPO certified volume of CPO and PK sold as certified are registered as shipping announcement in Palmtrace. The volume is declared upon completion of delivery of each sales contract within a month from the last delivery date. RSPO certified volume of CPO and PK sold as conventional or in case of under production, loss or damage shall be removed in the Palmtrace IT system of the Mill. | Yes |
| | <ul style="list-style-type: none"> Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. | The site is a Palm Oil Mill that never sold any oil palm product to supply chain actors beyond the refinery. | Yes |
| | <ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. | The site never sold any RSPO certified volume as other certification scheme. | Yes |
| | <ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. | The site is a Palm Oil Mill that never bought any oil palm product from other supply chain actor. | Yes |
| 5.8. Training | | | |
| 5.8.1 | The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff. | Training plans for 2019 was made available – incorporation with other training plans. | Yes |

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| 5.8.2 | Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed. | <p>Relevant personnel to supply chain implementation as defined by the CU are the personnel that involve in supply chain implementation -weighbridge operators, Lab operator and office staff.</p> <p>Based on training records, last training was conducted 22/2/2019 entitled "RSPO certified oil mill supply chain training", conducted by mill assistant attended by relevant personnel for RSPO SCC implementation.</p> <p>Verified training records dated 22/2/2019.</p> | Yes |
| 5.9. Record Keeping | | | |
| 5.9.1 | The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements. | Up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements were verified. | Yes |
| 5.9.2 | Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. | Addressed SOP (Module – CPO Mills : Identity Preserved) rev: 07 dated 15/2/2019, retention of records for RSPO SCC is minimum 3 years. | Yes |
| 5.9.3 | The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months. | Not applicable. The product of the facility is containing 100% palm oil. | Yes |
| 5.10. Conversion factors | | | |
| 5.10.1 | Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied | Conversion factor of CPO and PK production is depending on the actual OER and KER. | Yes |

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| | consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries. | | |
| 5.10.2 | Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate. | The facility is using the actual extraction rate and therefore updating of rates is not necessary. | Yes |
| 5.11. Claims | | | |
| 5.11.1 | The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims. | Site only use the RSPO-General corporate communications since the trademark used is on the file and storage tanks (off-product' claim). Sighted the RSPO trademark license no: 1-0004-04-100-00 with start date license from 05.07.2018 – 04.07.2020. | Yes |
| General corporate communications | | | |
| 4.1 | A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim. | Site only use the RSPO-General corporate communications since the trademark used is on the file and storage tanks (off-product' claim). Sighted the RSPO trademark license no: 1-0004-04-100-00 with start date license from 05.07.2018 – 04.07.2020. | Yes |
| 4.2 | In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org ' where the link must lead to the member's profile page. | Jenderata POM has used the RSPO trademark at 7 CPO storage tanks and sustainability files and the objective is to promote its membership. | Yes |

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| 4.3 | In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products. | No statement been made for the trademark used. | Yes |
| 4.4 | Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products. | The products, CPO and PK are not using the RSPO trademark. The trademark used is on the file and storage tank. | Yes |
| 4.5 | Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat. | No RSPO corporate logo used as evidence during the document audit and site visit. | Yes |
| Business to business communications | | | |
| 5.1 | Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products. | Jenderata POM did not use business to business communications since the CPO and PK to own refinery, Unitata Berhad therefore, this requirement is not applicable. | N/A |
| 5.2 | When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made. | Jenderata POM did not use business to business communications since the CPO and PK to own refinery, Unitata Berhad therefore, this requirement is not applicable. | N/A |
| 5.3 | Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. | Jenderata POM did not use business to business communications since the CPO and PK to own refinery, Unitata Berhad therefore, this requirement is not applicable. | N/A |

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| | b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. | | |
| 5.4 | <p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p> | Jenderata POM did not use business to business communications since the CPO and PK to own refinery, Unitata Berhad therefore, this requirement is not applicable. | N/A |
| Business to consumer communication | | | |
| 6.1 | Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary. | Jenderata POM did not use business to consumer communication since the CPO and PK to own refinery, Unitata Berhad. Therefore, this requirement is not applicable. | N/A |
| 6.2 | Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below. | Jenderata POM did not use business to consumer communication since the CPO and PK to own refinery, Unitata Berhad. Therefore, this requirement is not applicable. | N/A |
| 6.3 | When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present. | Jenderata POM did not use business to consumer communication since the CPO and PK to own refinery, Unitata Berhad. Therefore, this requirement is not applicable. | N/A |
| 6.4 | Business to consumer communication shall not include information about the claimant's RSPO membership status. | Jenderata POM did not use business to consumer communication since the CPO and PK to own refinery, Unitata Berhad. Therefore, this requirement is not applicable. | N/A |

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| 6.5 | Members shall not communicate to consumers information about their suppliers' RSPO membership status. | Jenderata POM did not use business to consumer communication since the CPO and PK to own refinery, Unitata Berhad. Therefore, this requirement is not applicable. | N/A |
| 6.6 | Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient. | Jenderata POM did not use business to consumer communication since the CPO and PK to own refinery, Unitata Berhad. Therefore, this requirement is not applicable. | N/A |
| 6.7 | Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim. | Jenderata POM did not use business to consumer communication since the CPO and PK to own refinery, Unitata Berhad. Therefore, this requirement is not applicable. | N/A |
| 6.8 | RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org . | Jenderata POM did not use business to consumer communication since the CPO and PK to own refinery, Unitata Berhad. Therefore, this requirement is not applicable. | N/A |

MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES

Certified oil palm content (IP)

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| | For IP, 95% or above of the oil palm content must be RSPO IP-certified. | Since the FFB source is only come from Jenderata Estate and Sri Pelangi Estate, all FFBs received in Jenderata POM is 100% IP certified FFBs. | Yes |
| | For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP. | UP-Jenderata POM only use IP supply chain model. | Yes |
| | Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume. | There is no non-certified FFB bought. The FFB coming from own estate and use the IP model. If there is any demand for conventional CPO & PK, Jenderata POM will downgrade the certified CSPO/CSPK directly to conventional products. This was confirmed during site visit and documentation verified. | Yes |
| Labelling and trademark (IP) | | | |
| | Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. | This labelling for IP is not been used by Jenderata POM in both CPO and CPKO. | N/A |
| Messaging (IP) | | | |
| | Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements: <ul style="list-style-type: none"> The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org | This messaging in labels or trademark is not been used by Jenderata POM in both CPO and CPKO. | N/A |

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| | <ul style="list-style-type: none"> • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. | | |
| MODULE B – MASS BALANCE SPECIFIC RULES | | | |
| Minimum Mass Balance content (MB) | | | |
| | 95% or above of the oil palm content must be RSPO MB-certified. | Site only apply IP model and the conventional CPO are downgraded from IP whenever demanded. | Yes |
| | Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits. | Site only apply IP model and the conventional CPO are downgraded from IP whenever demanded. | Yes |
| Labelling and trademark (MB) | | | |
| | <p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and | Site only apply IP model and the conventional CPO are downgraded from IP whenever demanded. | Yes |

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| | <p>outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</p> <ul style="list-style-type: none"> • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. | | |
| Messaging (MB) | | | |
| | <p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. • In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed. | <p>Site only apply IP model and the conventional CPO are downgraded from IP whenever demanded.</p> | <p>Yes</p> |
| | <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> | <p>Site only apply IP model and the conventional CPO are downgraded from IP whenever demanded.</p> | <p>Yes</p> |

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| | Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. | | |
| MODULE C – PARTIAL PRODUCT CLAIMS | | | |
| | <p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p> <ul style="list-style-type: none"> • The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO. • At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB. • The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume. • The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'. • The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim. | Site only apply IP model and the conventional CPO are downgraded from IP whenever demanded. | Yes |
| MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES | | | |
| | <p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p> <p>75% IP + 20% SG => 95% SG claim is made 65% SG + 30% MB => 95% MB claim is made 55% MB + 40% B&C => 95% partial product claim can be made 45% SG + 55% B&C < 50% B&C claim can be made</p> | Site only apply IP model and the conventional CPO are downgraded from IP whenever demanded. | Yes |

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| | <p>Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made:</p> <p>95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made</p> | <p>Site only apply IP model and the conventional CPO are downgraded from IP whenever demanded.</p> | <p>Yes</p> |
| 5.12. Complaints | | | |
| 5.12.1 | <p>The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.</p> | <p>The complaints received were regarding quality of FFB sent to mills received so far, no other issue captured. The records are available since 2016.</p> | <p>Yes</p> |
| 5.13. Management Review | | | |
| 5.13.1 | <p>The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.</p> | <p>As per SOP, Jenderata Mill is carry out the management review annually at planned intervals.</p> | <p>Yes</p> |
| 5.13.2 | <p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. | <p>Seen the latest Management Review dated 10.04.19 and cover input:</p> <ol style="list-style-type: none"> 1. Internal & External Result for RSPO & MSPO SCC. HRESH team has carried out the internal audit on 22nd Aug 2018. No NC raised for internal audit but 2 NC raised for external audit. 2. Customer feedback: Result of FFB grading feedback from customer eg: Jenderata Estate. 3. Status of preventive and corrective actions: No correction is required as no non-conformance detected. Corrective actions: management monitor the performance or quality of every CPO sample before dispatch. The CPO dispatch specs FFA below 5%. DOBI | <p>Yes</p> |

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| | | <p>above 2.3, M&I below 0.25%. The PK dispatch specs Dirt below 6%, moisture below 7%.</p> <p>4. Changes that could affect the management system: No changes.</p> <p>5. Recommendations for improvement: Close monitoring and avoid receiving off-spec crop quality and ensure minimal oil losses during processing.</p> | |
| 5.13.3 | <p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. | <p>Seen the latest Management Review dated 10.04.19 and cover output:</p> <p>Improvement and resource needed available as per the management review inputs in 5.13.2.</p> | Yes |

Appendix E : CPO Mill Supply Chain Assessment Report (Module D - CPO Mills: *Identity Preserved*)

| D.1 Definition | | | |
|----------------|--|---|---------------------------------|
| | Requirement | Evidence For any N/A raised, justification is required. | Compliance (Yes / No or N/A) |
| D.1.1 | <p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.</p> | <p>Jendarata Palm Oil Mill only accepts certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p> | Yes |

| D.2 Explanation | | | |
|----------------------------------|--|--|-----|
| D.2.1 | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report. | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill was recorded in this public summary report. | Yes |
| D.2.2 | The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform). | The Palmtrace ID for Jenderata POM: RSPO_PO1000000238. | Yes |
| D.3 Documented procedures | | | |
| D.3.1 | The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a. Complete and up to date procedures covering the implementation of all the elements in these requirements; | The RSPO SCC SOP (Module D-CPO Mills: IP) has been revised with the new standard June 2017, SOP Revision 07, dated 15.02.2019. | Yes |
| | b. The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard. | The person having overall responsibility for and authority over the implementation is Head of Oil Mill as per letter of appointment on 15 th February 2019 to Mr P. Rajasegaran (Group Engineer, Downriver Jenderata Engineering Department). | Yes |
| D.3.2 | The site shall have documented procedures for receiving and processing certified FFBS. | UP Jenderata POM is using the IP supply chain model since it receives the FFB from own estates. The downgrading procedure | Yes |

| | | | |
|------------------------------------|---|--|-----|
| | | from IP to SG is available as per The SOP (Module D-CPO Mills: IP). For buyer who does not require RSPO certified CPO or PK, downgrading can be done from certified material to non-certified material. | |
| D.4 Purchasing and goods in | | | |
| D.4.1 | The site shall verify and document the tonnage and sources of certified FFBs received. | When FFB delivered to the mill from the estates, the transporters presented delivery order to the mill weighbridge clerk in order the FFB to be received by the mill. The delivery order has the information of supplier ID (which indicates the supplying estate), docket number, date of delivery, field number, vehicle registration number and weight. | Yes |
| D.4.2 | The site shall inform the CB immediately if there is a projected overproduction of certified tonnage. | There was no projected overproduction of certified tonnage. Nonetheless, the facility is aware of the requirement of informing the CB should there be any. | Yes |
| D.5 Record keeping | | | |
| D.5.1 | The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. <i>IP Mill must report on real time basis.</i> | Records and balance of all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK in Daily Process Report which data sourced from weighbridge system. Verification of the records shows that the mill was able to record on real-time basis. | Yes |
| D.6 Processing | | | |
| D.6.1 | The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation. | The mill does not accept any FFB from non-RSPO certified estates and this can be seen in their daily process report and monthly summary. Therefore, the 100% separation from non-certified is achievable by the facility. | Yes |

Supply Chain Declaration

| A. Monthly Records of Certified and Uncertified FFB Received since the last audit | | | | |
|--|---------------------|---|---|-----------------------------|
| No. | Month - Year | Volume of FFB from certified supply bases (mt) | Volume of FFB from uncertified supply bases (mt) | Total FFB/Month (mt) |
| 1 | June 18 | 10,805.40 | - | 10,805.40 |
| 2 | July 18 | 10,796.47 | - | 10,796.47 |
| 3 | Aug 18 | 10,560.91 | - | 10,560.91 |
| 4 | Sept 18 | 11,953.79 | - | 11,953.79 |
| 5 | Oct 18 | 14,804.94 | - | 14,804.94 |
| 6 | Nov 18 | 11,473.10 | - | 11,473.10 |
| 7 | Dec 18 | 10,191.21 | - | 10,191.21 |
| 8 | Jan 19 | 11,203.57 | - | 11,203.57 |
| 9 | Feb 19 | 10,381.30 | - | 10,384.30 |
| 10 | Mar 19 | 11,356.46 | - | 11,356.46 |
| 11 | Apr 19 | 11,902.88 | - | 11,902.88 |
| 12 | May 19 | 11,245.15 | - | 11,245.15 |
| | TOTAL | 136,675.18 | - | 136,678.18 |

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Revision 8 (Mar /2019)

| A. Monthly Records of Certified CPO & PK since the last audit | | | |
|--|---------------------|---------------------------|--------------------------|
| No. | Month - Year | Certified CPO (MT) | Certified PK (MT) |
| 1 | June 18 | 2,427 | 559 |
| 2 | July 18 | 2,405 | 575 |
| 3 | Aug 18 | 2,509 | 586 |
| 4 | Sept 18 | 2,717 | 653 |
| 5 | Oct 18 | 3,315 | 769 |
| 6 | Nov 18 | 2,472 | 581 |
| 7 | Dec 18 | 2,196 | 507 |
| 8 | Jan 19 | 2,467.80 | 524.90 |
| 9 | Feb 19 | 2,367 | 562 |
| 10 | Mar 19 | 2,628 | 584 |
| 11 | Apr 19 | 2,723 | 616 |
| 12 | May 19 | 2,521 | 579 |
| | TOTAL | 30,747.80 | 7,095.90 |

| B. Records of Certified CPO & PK Sold under PalmTrace to Buyers (Oct 18 – May 19) | | | | |
|--|--------------------|---|--------------------------------|-------------------------------|
| No. | Buyers Name | Palmtrace Trading No | Certified CPO Sold (MT) | Certified PK Sold (MT) |
| 1 | XXXXX | TR-8fb3d578-4a28, TR-16e88089-5f1a, TR-20e3c7a0-08bb, TR-dde6b609-9535, TR-c630d8a0-a97b, TR-93ff9d5f-7192, TR-26deabca-bb70, TR-c12677d2-3889, TR-a19d7f95-4fd7, TR-54113e45-6e7d, TR-9a3f2761-6f7f, TR-6e08e15c-1c6c, TR-c7397769-1dbe, TR-3814dc12-4c17, TR-e4335391-2f7d, TR-bc6f5311-f129 | | 4,291.97 |
| 2 | XXXXX | TR-6d6d3dc9-acdf, TR-121bf160-b9cb, TR-da3d6feb-55a1, TR-50493903-2516, TR-caec9420-2e9b, TR-9e309355-4cc1, TR-3177f59e-1220, TR-ca4bb654-95af, TR-b540bc57-cc92, TR-f06437f0-1324, TR-57c512c7-79b1, TR-68461e96-4dcf, TR-dd5ba38c-3116, TR-0e9ae3c6-9794, TR-2f6075a6-9f87, TR-b6c7f800-059e, TR-8c50921c-648e, TR-5a86c212-e2ca, TR-313a22e3-dec9, TR-d56b6ca3-c6a2, TR-a60aacef-75e5, TR-7d8db317-8e18, TR-44819f61-d74e, TR-1afc435f-7876, TR-1bf66a9b-ba59, TR-a775be76-34fd, TR-1b18d170-84b1, TR-1d1361c8-5b46, | 17,729.94 | |

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| | | | | |
|--|--------------|--|------------------|-----------------|
| | | TR-3265ddb-9704, TR-d7c181d9-5ac4, TR-c16066f6-aaff, TR-de40679b-1b3a, TR-c11fe768-6fe8, TR-242dc5fd-f01c, TR-5b64560c-ac33, TR-0f2ebe25-541d, TR-1a0e646e-c87b, TR-46a78575-4bce, TR-eea153aa-02de, TR-3aa5412d-3d70, TR-319501bf-5bf4, TR-2a6aa2d4-bc0c, TR-9f9e6f5f-9547, TR-6183e67f-20db, TR-9caaa855-5f60, TR-1745b133-56e3, TR-bdfa0926-d8df, TR-3571644e-0185, TR-753c4917-bb6f, TR-97a5e1fe-4d1a, TR-05e8b3f4-d7a0, TR-19600063-eecf, TR-ccc63a34-e776, TR-51d6117d-30cf, TR-cf6135b4-5810, TR-1c63bc88-e4c3 | | |
| | TOTAL | | 17,729.94 | 4,291.97 |

| C. Records of CPO & PK Sold under other schemes to Buyers (Oct 18 – May 19) | | | | |
|--|-------------|-------------|---------------|--------------|
| No. | Buyers Name | Scheme Name | CPO Sold (MT) | PK Sold (MT) |
| -Nil- | - | - | - | - |
| | | | | |

| D. Records of CPO & PK Sold as conventional to Buyers (Oct 18 – May 19) | | | | |
|--|--------------|-----------------|--------------|--|
| No. | Buyers Name | CPO Sold (MT) | PK Sold (MT) | |
| Oct 18 | XXXXX | 711.69 | - | |
| Oct 18 | XXXXX | 168.70 | - | |
| Oct 18 | XXXXX | 752.32 | - | |
| Oct 18 | XXXXX | 914.20 | - | |
| Nov 18 | XXXXX | 87.26 | - | |
| Dec 18 | XXXXX | 332.16 | - | |
| Mar 19 | XXXXX | 243.58 | - | |
| | TOTAL | 3,209.91 | - | |

| E. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any) | | | |
|--|-------------|----------------------|---|
| No. | Buyers Name | PalmTrace Trading No | RSPO Credits of Certified CPO Sold (MT) |
| N/A | | | |
| | | | |

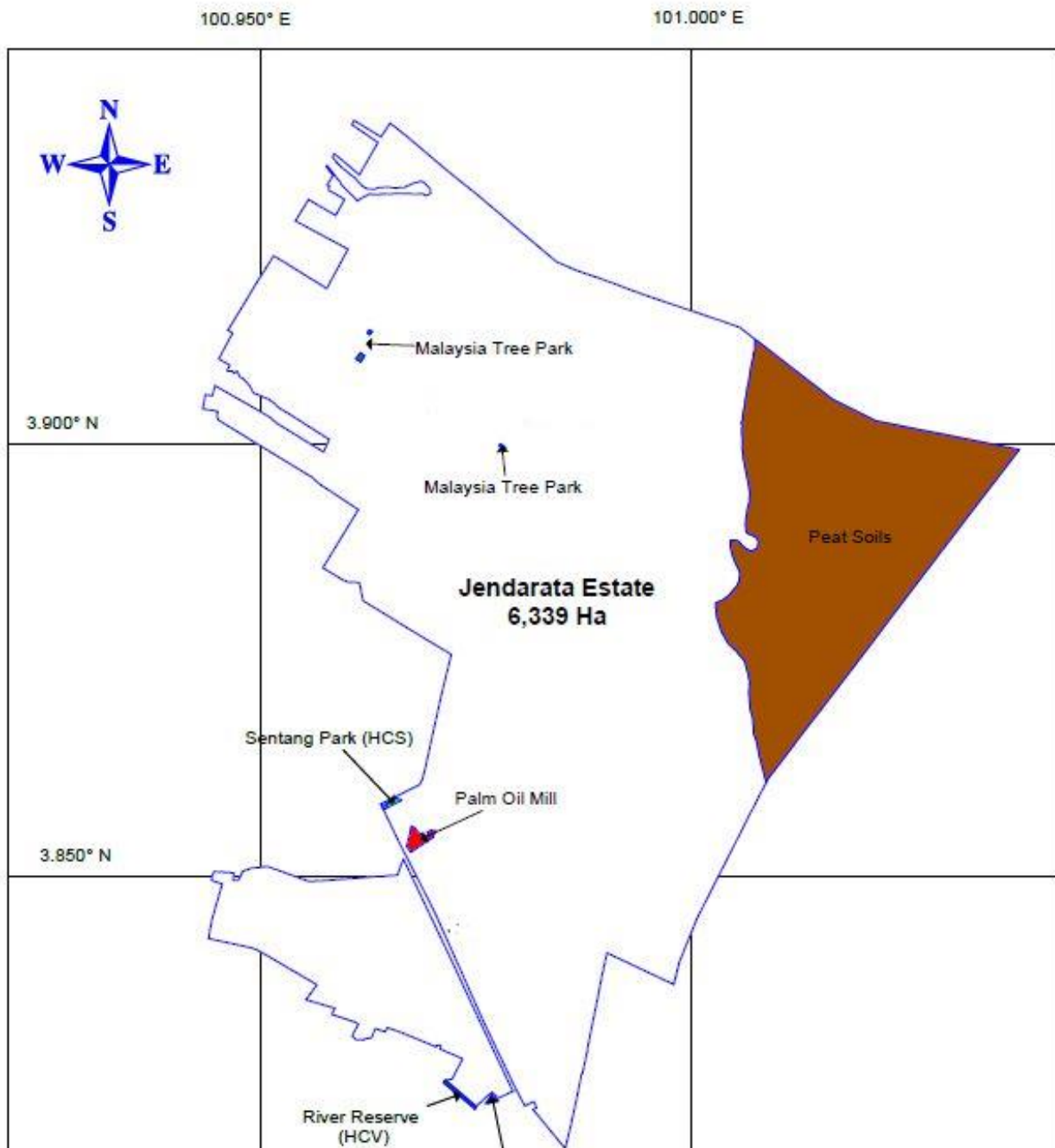
Appendix F: Location Map of Jendarata Palm Oil Mill Certification Unit and Supply bases



Appendix G: Jendarata Estate Field Map



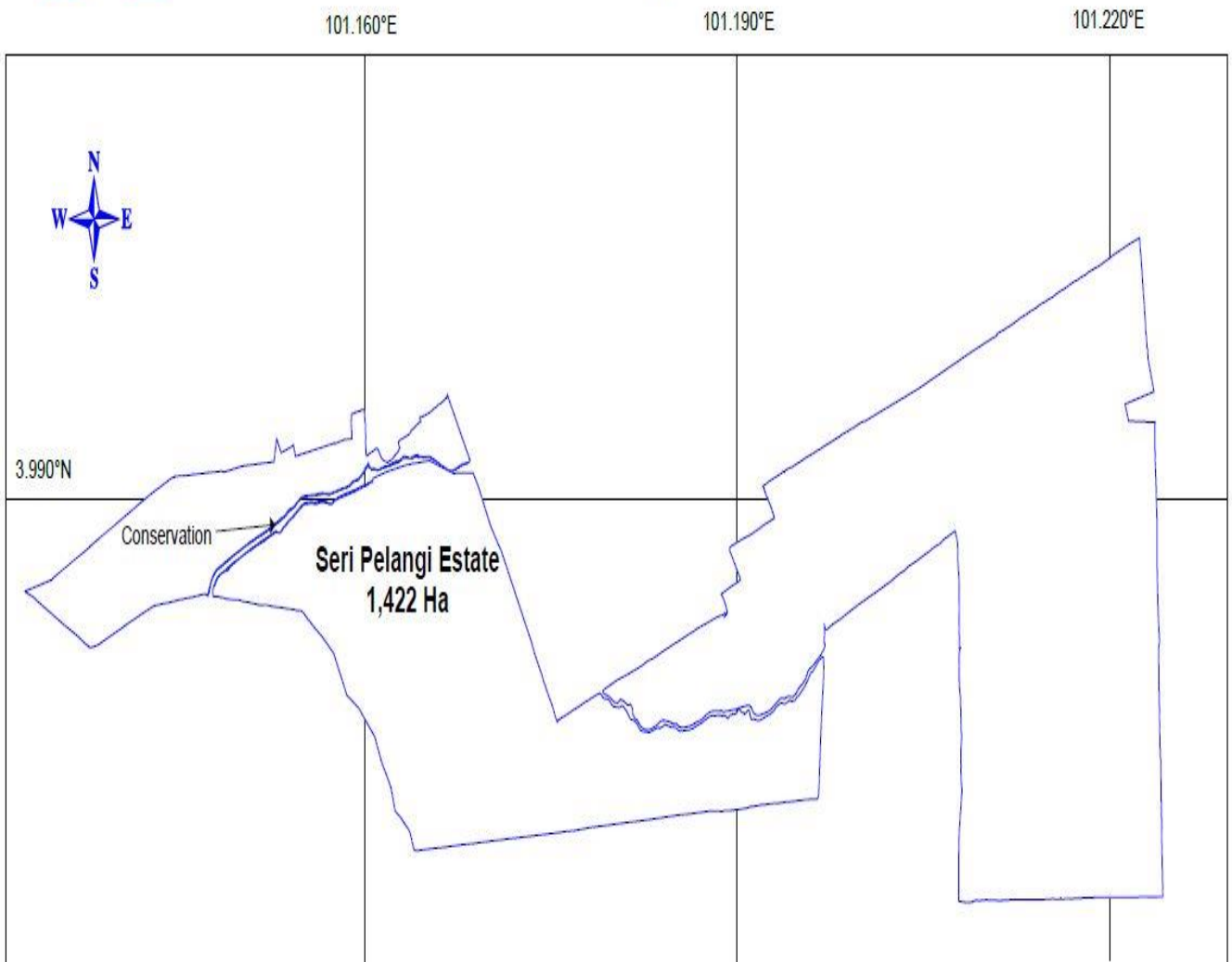
United Plantations Berhad
Jendarata Estate



Appendix H: Seri Pelangi Estate Field Map



**United Plantations Berhad
Seri Pelangi Estate**



Appendix I: List of Smallholder Sampled *(If applicable – scheme/associated/group certification)*

Not applicable

Appendix J: List of Abbreviations

| | |
|------------|--|
| a.i | Active Ingredient |
| BOD | Biochemical Oxygen Demand |
| CB | Certification Bodies |
| CHRA | Chemical Health Risk Assessment |
| COD | Chemical Oxygen Demand |
| CPO | Crude Palm Oil |
| CSPO | Certified Sustainable Palm Oil |
| CSPKO | Certified Sustainable Palm Kernel Oil |
| EFB | Empty Fruit Bunch |
| EHS | Environmental, Health and Safety |
| EIA | Environmental Impact Assessment |
| EMS | Environmental Management System |
| FFB | Fresh Fruit Bunch |
| FPIC | Free, Prior, Informed and Consent |
| GAP | Good Agricultural Practice |
| GHG | Greenhouse Gas |
| GMP | Good Manufacturing Practice |
| GPS | Global Positioning System |
| HCV | High Conservation Value |
| IPM | Integrated Pest Management |
| IP | Identity Preserved |
| IS - CSPO | Independent Smallholder Certified Sustainable Palm Oil |
| IS – CSPKO | Independent Smallholder Certified Sustainable Palm Kernel Oil |
| IS – CSPKE | Independent Smallholder Certified Sustainable Palm Kernel Expeller |
| ISCC | International Sustainable Carbon Certification |
| LD50 | Lethal Dose for 50 sample |
| MB | Mass Balance |
| MSDS | Material Safety Data Sheet |
| MT | Metric Tonnes |
| OER | Oil Extraction Rate |
| OSH | Occupational Safety and Health |
| PK | Palm Kernel |
| PKO | Palm Kernel Oil |
| POM | Palm Oil Mill |
| POME | Palm Oil Mill Effluent |
| PPE | Personal Protective Equipment |
| RSPO | Roundtable on Sustainable Palm Oil |
| P&C | Principles & Criteria |
| RTE | Rare, Threatened or Endangered species |
| SCCS | Supply Chain Certification Standard |
| SEIA | Social & Environmental Impact Assessment |
| SIA | Social Impact Assessment |
| SOP | Standard Operating Procedure |