

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

□ Initial Assessment

☑ Annual Surveillance Assessment (1_4)

⊠ Recertification Assessment (RA 2)

□ Extension of Scope

Client Company Name / Parent Company: United Plantations Berhad

Client Company / Parent Company Address: Jendarata Estate 36009 Teluk Intan, Perak, Malaysia

Certification Unit:

United International Enterprises POM

Location of Certification Unit: KM 9, Jalan Bruas-Ayer Tawar, 34900 Pantai Remis, Perak, Malaysia

Date of Final Report: 29/09/2022



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Section 1: Scope of the Assessment

| 1. Company Details | | | | | |
|---|---|----------------|---------------------|------------|--|
| Parent Company | United Plantations Berhad | | | | |
| RSPO Membership Number | 1-0004-04-000-00 | Membership | Approval Date | 20/07/2004 | |
| Address | Jendarata Estate, Jalan Kuala Selangor – Teluk Intan, 36009 Teluk Intan, Perak, Malaysia | | | | |
| Palm Oil Mill / Group Manager / Estate (Certification Unit) | United International Enterprises POM | | | | |
| Location / Address | KM 9, Jalan Bruas-Ayer Tawa | r, Pantai Remi | s, 34900 Perak, Mal | laysia | |
| Website | https://unitedplantations.com/ | | | | |
| Management Representative | Lee Kian Wei E-mail <u>lkw@unitedplantations.com</u> | | | | |
| Telephone | +605-643 6271 | Facsimile | +605-641 7100 | | |

| 2. Certification Informat | 2. Certification Information | | | | | |
|---|--|-------------|----------------------|------------|--|--|
| Certificate Number | RSPO 693198 | Certificat | te Start Date | 29/09/2022 | | |
| Date of First Certification | 29/09/2012 | Certificat | te Expiry Date | 28/09/2027 | | |
| Scope of Certification | Production of Palm Oil and Pa | alm Kernel | | | | |
| Visit Objectives | The objective of the assessment is to conduct a recertification audit with additional 50% sampling size to ensure the elements of the scope registration and the requirements of the management standard are effectively addressed by UIE POM and supply base's management system and the ability of the management system to ensure the organisation meets applicable statutory, regulatory and contractual requirements and as applicable, to identify areas for potential improvement of the management system. | | | | | |
| Assessment Cycle | □ Pre Assessment (Choose an item.) □ Initial Assessment ⋈ Annual Surveillance Assessment (ASA 1_4) ⋈ Recertification Assessment (RA 2) □ Scope Extension | | | | | |
| Applicable Standards / Normative Reference | RSPO Certification System for P&C and RSPO ISH 2020 ☐ Choose an item. ☐ Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil | | | | | |
| Supply Chain Module | ☐ Identity Preserved; ☐ Mass Balance | | | | | |
| ISH certification Phase | ☐ Eligibility ☐ Milestone A | ☐ Milestone | e B ⊠ Not Applicable | | | |



| 3. Other Certifications | | | | | |
|---------------------------|--|---------------------------------|-------------|--|--|
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date | | |
| MSPO 693206 | MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders | | 27/09/2023 | | |
| MSPO 693205 | MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills | BSI Services Malaysia Sdn. Bhd. | 27/09/2023 | | |
| MSPO 709995 | MSPO SCCS:2018 | | 11/07/2024 | | |

| 4. Location(s) of Mill & Supply Bases | | | | | |
|---------------------------------------|--|-----------------|------------------|--|--|
| Name (Mill / Supply Base / Group | Location | GPS Coordinates | | | |
| Manager / Smallholders) | | Latitude | Longitude | | |
| UIE Palm Oil Mill | KM 9, Jalan Bruas-Ayer Tawar, 34900 Pantai Remis, Perak Darul Ridzuan, Malaysia | 4°26′ 53.06″ N | 100°43′ 11.17″ E | | |
| UIE Estate | KM 9, Jalan Bruas-Ayer Tawar, 34900 Pantai Remis, Perak Darul Ridzuan, Malaysia | 4°26′ 38.10″ N | 100°43′ 22.10″ E | | |

| 5. Description of Supply Base | | | | | |
|-------------------------------|--|-------------|-----------------------------------|--------------------|-----------------|
| New Planting Development | ☑ No (no change in total planted area) ☐ Yes (please refer to Principle 7 for details) | | | | |
| Estate / Smallholders | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
| UIE Estate | 8,949.56 | 140.67 | 1,274.97 | 10,365.20 | 86.34 |
| Total | 8,949.56 | 140.67 | 1,274.97 | 10,365.20 | 86.34 |

Note:

- Total HCV ha = HCV (12.53) + Conservation (128.14)
- Total infrastructure ha = Road/Building (485.71) + Coconut plantation (789.26)
- Reduction 4 ha from previous total area due to latest re-survey by UPRD team

| 6. Plantings & Cycle | | | | | | |
|--|-------|----------|----------|--------|----------|---|
| Estate / Smallholders Age (Years) - ha | | | | Mature | Immature | |
| | 0 - 3 | 4 - 14 | 15 - 25 | >25 | | |
| UIE Estate | - | 6,474.55 | 2,475.01 | - | 8,949.56 | - |
| Total (ha) | - | 6,474.55 | 2,475.01 | - | 8,949.56 | - |
| Note: - | | | | | | |



| | Tonnage (MT) / year | | | |
|---------------------|--|--|---|--|
| Estimated last year | Actual (Sep 2020 – May 22) | | Forecast (Sep 2022 – Aug | |
| 2022) | Previous license period (Sep 2020 – Aug 2021) | Current license period (Sep 2021 – May 2022) | 2023) | |
| 616,000.00 | 281,051.08 | 192,738.52 | 290,000.00 | |
| 616,000.00 | 473,789.60 290,000.00 | | | |
| | (Sep 2020 – Aug 2022) 616,000.00 | Estimated last year (Sep 2020 – Aug 2022) Previous license period (Sep 2020 – Aug 2021) 616,000.00 281,051.08 | Actual (Sep 2020 - May 22) Previous license period (Sep 2021 - May 2021) Current license period (Sep 2020 - Aug 2021) Current license period (Sep 2020 - Aug 2021) 192,738.52 | |

Note:

- Estimated FFB = (Sep 2020 - Aug 2021 = 280,000.00 mt) + (extension Sep 2021 - Aug 2022 = 336,000.00 mt)

| 8. Summary of Certified Tonnage of FFB (from other certified unit(s)) | | | | | | |
|---|--|--|---|-----------------------------|--|--|
| Estate / Smallholders | | Tonnage (| (MT) / year | | | |
| | Estimated last year (Sep 2020 – Aug | Actual (Sep 2020 – May 22) | | Forecast (Sep 2022 – Aug | | |
| | 2022) | Previous license period (Sep 2020 – Aug 2021) | Current license period (Sep 2021 – May 2022) | 2023) | | |
| Nil | | N/A | N/A | | | |
| Total N/A | | | | | | |
| Note: - | | | | | | |

| 9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) | | | | | | |
|---|----------------------------------|--|---|-----------------------|--|--|
| Out growers / | | Tonnage (| (MT) / year | | | |
| smallholders | Estimated last year (Sep 2020 | Actual (Sep 2020 – May 22) | | Forecast (Sep 2022 | | |
| | – Aug 2022) | Previous license period (Sep 2020 – Aug 2021) | Current license period (Sep 2021 – May 2022) | – Aug 2023) | | |
| Nil | N/A | N/A | N/A | N/A | | |
| Total | N/A | N, | /A | N/A | | |
| Note: - | | | | | | |

| 9A. I | 9A. Monthly Records of Certified and Uncertified FFB Received since the last audit | | | | | |
|-------|--|---|---|-------------------------|--|--|
| No. | Month - Year | Volume of FFB from certified supply base (mt) | Volume of FFB from uncertified supply base (mt) | Total FFB/Month (mt) | | |
| 1 | Sep-20 | 16,877.71 | - | 16,877.71 | | |
| 2 | Oct-20 | 17,988.82 | - | 17,988.82 | | |



| Note | : - | | | |
|------|--------|------------|---|------------|
| | TOTAL | 473,789.60 | | 473,789.60 |
| 21 | May-22 | 23,637.61 | - | 23,637.61 |
| 20 | Apr-22 | 22,526.51 | - | 22,526.50 |
| 19 | Mar-22 | 18,082.06 | • | 18,082.06 |
| 18 | Feb-22 | 24,626.37 | - | 24,626.37 |
| 17 | Jan-22 | 25,736.39 | - | 25,736.39 |
| 16 | Dec-21 | 26,847.49 | • | 26,847.49 |
| 15 | Nov-21 | 18,204.41 | • | 18,204.41 |
| 14 | Oct-21 | 17,094.39 | • | 17,094.39 |
| 13 | Sep-21 | 15,983.29 | - | 15,983.29 |
| 12 | Aug-21 | 31,075.24 | • | 31,075.24 |
| 11 | Jul-21 | 32,186.35 | - | 32,186.35 |
| 10 | Jun-21 | 33,297.46 | - | 33,297.46 |
| 9 | May-21 | 15,766.64 | - | 15,766.60 |
| 8 | Apr-21 | 14,655.49 | - | 14,655.49 |
| 7 | Mar-21 | 13,544.38 | • | 13,544.38 |
| 6 | Feb-21 | 27,741.92 | - | 27,741.92 |
| 5 | Jan-21 | 28,853.02 | - | 28,853.02 |
| 4 | Dec-20 | 29,964.13 | - | 29,964.13 |
| 3 | Nov-20 | 19,099.92 | - | 19,099.92 |

| 10. Summary of Certified | 10. Summary of Certified Tonnage (MT) (not applicable for ISS) | | | | | | |
|--------------------------|--|---|-----------------------|--|--|--|--|
| Estimated last year | | ual — May 22) | Forecast | | | | |
| (Sep 2020 – Aug 2022) | Previous license period (Sep 2020 – Aug 2021) | Current license period (Sep 2021 – May 2022) | (Sep 2022 – Aug 2023) | | | | |
| FFB | FI | - В | FFB | | | | |
| 616,000.00 mt | 281,051.08 mt | 192,738.52 mt | 290,000.00 mt | | | | |
| | 473,789 | 9.60 mt | | | | | |
| CPO (OER: 23.00 %) | CPO (OER: | 21.79 %) | CPO (OER: 23.00 %) | | | | |
| 138,360.00 mt | 61,241.03 mt | 41,997.72 mt | 66,700.00 mt | | | | |
| | 103,23 | 8.75 mt | | | | | |
| PK (KER: 5.00 %) | PK (KER: | PK (KER: 4.80 %) | | | | | |
| 30,128.00 mt | 12,113.30 mt | 8,307.03 mt | 13,920.00 mt | | | | |
| | 20,420 | 0.33 mt | | | | | |



Note:

Estimated CPO = (Sep 2020 - Aug 2021 = 64,400.00 mt) + (extension Sep <math>2021 - Aug 2022 = 73,920.00 mt)Estimated PK = (Sep 2020 - Aug 2021 = 14,000.00 mt) + (extension Sep <math>2021 - Aug 2022 = 16,128.00 mt)

| 10A. Monthly Records of Certified CPO & PK since the last audit | | | | | | | | |
|---|--------------|--------------------|-------------------|--|--|--|--|--|
| No. | Month - Year | Certified CPO (MT) | Certified PK (MT) | | | | | |
| 1 | Sep-20 | 3,677.65 | 727.43 | | | | | |
| 2 | Oct-20 | 3,919.76 | 775.32 | | | | | |
| 3 | Nov-20 | 4,161.87 | 823.21 | | | | | |
| 4 | Dec-20 | 6,529.18 | 1,291.45 | | | | | |
| 5 | Jan-21 | 6,287.07 | 1,243.57 | | | | | |
| 6 | Feb-21 | 6,044.97 | 1,195.68 | | | | | |
| 7 | Mar-21 | 2,951.32 | 583.76 | | | | | |
| 8 | Apr-21 | 3,193.43 | 631.65 | | | | | |
| 9 | May-21 | 3,435.54 | 679.54 | | | | | |
| 10 | Jun-21 | 7,255.52 | 1,435.12 | | | | | |
| 11 | Jul-21 | 7,013.42 | 1,387.23 | | | | | |
| 12 | Aug-21 | 6,771.30 | 1,339.34 | | | | | |
| 13 | Sep-21 | 3,482.76 | 688.88 | | | | | |
| 14 | Oct-21 | 3,724.87 | 736.77 | | | | | |
| 15 | Nov-21 | 3,966.73 | 784.61 | | | | | |
| 16 | Dec-21 | 5,850.07 | 1,157.13 | | | | | |
| 17 | Jan-22 | 5,607.96 | 1,109.24 | | | | | |
| 18 | Feb-22 | 5,366.09 | 1,061.40 | | | | | |
| 19 | Mar-22 | 3,940.08 | 779.33 | | | | | |
| 20 | Apr-22 | 4,908.52 | 970.89 | | | | | |
| 21 | May-22 | 5,150.64 | 1,018.78 | | | | | |
| • | TOTAL | 103,238.75 | 20,420.33 | | | | | |



11. Summary of Actual Volume sold **Current License period (Sep 2021 – May 2022) Other Schemes Certified RSPO Certified** Conventional **Total ISCC Others** CPO (MT) 41,967.35 41,967.35 8,735.42* PK (MT) 8,735.42 **Credits** Previous License period (Sep 2020 - Aug 2021) CPO (MT) 59,863.98 59,863.98 PK (MT) 11,512.15 11,512.15 **Credits**

Note: Conventional is RSPO certified material but sold as non-RSPO.

^{*} Volume carried forward from Sept 2020 – Aug 2021 period

| 11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any) | | | | | | | |
|---|-------------|-------------------------------------|-------------------------|---------------------------|--|--|--|
| No. | Buyers Name | PalmTrace Trading License Number | Certified CPO Sold (MT) | Certified PK Sold (MT) | | | |
| 1 | Α | TR-1fcce668-a509 | 101,831.33 | - | | | |
| 2 | Α | TR-9977bed9-0aea | | - | | | |
| 3 | А | TR-9034c1b0-3356 | | - | | | |
| 4 | А | TR-dd215a4f-5b01 | | - | | | |
| 5 | А | TR-65fdf7f6-178b | | - | | | |
| 6 | А | TR-a15012c7-89bf | | - | | | |
| 7 | А | TR-a8b0db41-e073 | | - | | | |
| 8 | А | TR-8cfa4e26-3feb | | - | | | |
| 9 | А | TR-b2ddb3e6-3d50 | | - | | | |
| 10 | А | TR-1fcce668-a509 | | - | | | |
| 11 | А | TR-b08feba0-3c2e | - | 20,247.57 | | | |
| 12 | А | TR-b10eb80c-71e8 | - | | | | |
| | | TOTAL | 101,831.33 | 20,247.57 | | | |



| 11B. Re | 11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any) | | | | | |
|---------|---|-------------|-------------------------|---------------------------|--|--|
| No. | Buyers Name | Scheme Name | Certified CPO Sold (MT) | Certified PK Sold (MT) | | |
| Nil | N/A | N/A | N/A | N/A | | |
| | | TOTAL | N/A | N/A | | |
| Note: - | | | | | | |

| 11C. Records of CPO & PK Sold as conventional since the last audit (if any) | | | | | |
|---|-------------|------------------|-----------------|--|--|
| No. | Buyers Name | CPO Sold (MT) | PK Sold (MT) | | |
| Nil | N/A | N/A | N/A | | |
| | TOTAL | N/A | N/A | | |
| Note: - | | | | | |

| 11D. Re | 11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any) | | | | | |
|---------|---|-------------------------------------|------------------------------------|--|--|--|
| No. | Buyers Name | PalmTrace Trading License Number | RSPO Credits of Certified CPO Sold | | | |
| Nil | N/A | N/A | N/A | | | |
| | TOTAL N/A | | | | | |
| Note: - | | | | | | |

| 12. Independent Smallholders Certified Tonnage (MT) / Volume | | | | | | | | | |
|--|---|------|------|----------------------------|------|------|------------------------------|------|------|
| | Estimated last year (Not Applicable) | | (No | Actual (Not Applicable) | | | Forecast (Not Applicable) | | |
| Dhace | Eligibility | MS A | MS B | Eligibility | MS A | MS B | Eligibility | MS A | MS B |
| Phase | 40% | 70% | 100% | 40% | 70% | 100% | 40% | 70% | 100% |
| FFB | | | N/A | | | N/A | | | N/A |
| IS-CSPO | N/A | N/A | | N/A | N/A | | N/A | N/A | |
| IS-CSPKO | N/A | N/A | | N/A | N/A | | N/A | N/A | |
| IS-CSPKE | N/A | N/A | | N/A | N/A | | N/A | N/A | |
| CSPK | N/A | N/A | | N/A | N/A | | N/A | N/A | |



| 12A. | 12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit | | | | | | |
|------|--|-------------|-----------------------|----------------------|--------------------|--------------------|--|
| No. | Month - Year | FFB (MT) | Certified CPO (MT) | Certified PK (MT) | Certified PKO (MT) | Certified PKE (MT) | |
| Nil | N/A | N/A | N/A | N/A | N/A | N/A | |
| | TOTAL | N/A | N/A | N/A | N/A | N/A | |
| Note | Note: 1 mt = 1 credit | | | | | | |

| 13. Inde | 13. Independent Smallholders Actual Sold Tonnage / Volume | | | | | | | |
|-------------------|---|---------------------|-------------------|---------|------|----------|----------|--|
| | FFB | FFB Conventional | FFB Other schemes | IS-CSPO | CSPK | IS-CSPKO | IS-CSPKE | |
| Current Li | Current License period (Not Applicable) | | | | | | | |
| Credits | | | | N/A | N/A | N/A | N/A | |
| Physical | N/A | N/A | N/A | | | | | |
| Previous I | Previous License period (Not Applicable) | | | | | | | |
| Credits | | | | N/A | N/A | N/A | N/A | |
| Physical | N/A | N/A | N/A | | | | | |

| 13A. | 13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit | | | | | | | |
|------|--|--|------------------|----------|-------------------------------------|----------|--------------------------------------|--|
| No. | Buyers Name | PalmTrace Trading License Number | FFB Sold (MT) | CPO Sold | Certified PK Sold (MT/credit) | PKO Sold | Certified PKE Sold (MT/credit) | |
| Nil | N/A | N/A | N/A | N/A | N/A | N/A | N/A | |
| | | TOTAL | N/A | N/A | N/A | N/A | N/A | |
| Note | Note: - | | | | | | | |



Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067) Suite 29.01 Level 29, The Gardens North Tower, Mid Valley City, Lingkaran Syed Putra, 59200 Kuala Lumpur, Malaysia.
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BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI 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.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 30 May – 3 June 2022. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on https://www.bsigroup.com/globalassets/localfiles/en-my/rspo/Public%20Notification/2022/05-2-rspo-public-notification recertification jendarata-palm-oil-mill--supply-base english.pdf. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24th March 2020. The remote audit was conducted on 21 – 22 September 2021. Due to this, the audit covered 150% of required audit days.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The Critical NC close out assessment was conducted off-site via verification of accepted CAP documentations submitted via email.

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. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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 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 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer 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 (RC2) | Year 2 (ASA2_1) | Year 3 (ASA2_2) | Year 4 (ASA2_3) | Year 5 (ASA2_4) |
| UIE Palm Oil Mill | ✓ | ✓ | ✓ | ✓ | ✓ |
| UIE Estate | ✓ | ✓ | ✓ | ✓ | ✓ |

Tentative Date of Next Visit: June 1, 2023 - June 3, 2023

Total Number of Mandays: 9

2.2 BSI Assessment Team

| Name | Role | Competency |
|-----------------------------------|------|---|
| Hafriazhar Mohd. Mokhtar (HMM) | | Education: Bachelor of Engineering (Hons.) Chemical Engineering, UTM. Work Experience: Near 20 years of working experience in multiple engineering disciplines emphasized on science, technology and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation and mining before shifted into auditing. In short, his career began as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in plantation, Project Control Engineer (2008-2011) in mining and Auditor/Client Manager (2011-present) in certifications auditing. |
| | | Training attended: Social Auditing & SMETA Training (2021), ISO 45001 LA Training (2018), MSPO LA Training (2017), RSPO SCCS LA Training (2016), RSPO P&C LA Training (2015), ISO 9001 LA Training (2013), ISO 50001 LA Training (2012), ISO 14001 LA Training (2011). |
| | | Aspect covered in this audit: During this assessment, he covered Economic management plan, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV, Environment responsibility, training, environment impact assessment and management plan. |
| | | Language proficiency: Bahasa Malaysia and English. |



| Muhamad Naqiuddin Mazeli (MNM) | Team Leader | Education: Bachelor of Science Horticulture, University Putra Malaysia Work Experience: 11 years working experience in oil palm industry managing sustainability implementation and certification of RSPO P&C, ISCC, and ISO9001 and ISO 18001 for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO and other certifications where applicable to the operations during previous company. Training attended: ISO 9001: 2015 LA Training (2018), ISO 14001: 2015 LA Training (2019), ISO 45001: 2018 LA Training (2019), HCV & HCS Training (2020), RSPO P&C LA Training (2018) and Social Auditing & SMETA Training (2021) Aspect covered in this audit: During this assessment, he covered aspects of economic management plan, mill best practices, Occupation Health Safety requirement, HIRARC, training and management plan and RSPO supply chain requirements. Language proficiency: Bahasa Malaysia and English | | | | |
|--------------------------------------|---------------|--|--|--|--|--|
| Mohd. Razaleigh Mohamad (MRM) | Team Member | Education: Bachelor Degree in Plantation Management and Agrotechnology, University Technology Mara (UiTM). | | | | |
| | | Work Experience: 5 years experience in Oil Palm Estate Management with Tradewinds Plantation Berhad. The last position held was Senior Assistant Manager. He has more than 4 years of experience in Third Party Certification Audit with Control Union (M) Sdn Bhd for RSPO P&C, MSPO P&C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements. | | | | |
| | | Training attended: Razaleigh has successfully completed ISO 9001-2015 (2020), ISO14001- 2015 (2017), ISO45001-2018 (2021), Endorsed RSPO P&C Lead Auditor Course (2018), Endorsed MSPO P&C Lead Auditor Course (2017), Social Accountability SA8000 (2019), Endorsed RSPO Independent Smallholder (IHS), (2022). Qualified auditor for environment and social aspect | | | | |
| | | Aspect covered in this audit: Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue | | | | |
| | | Language proficiency: Bahasa Malaysia and English | | | | |
| Dr. Suhaili Sahari | Peer Reviewer | Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda. | | | | |
| | | Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business | | | | |



| and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan. |
|--|
| Training attended: |
| 1. ISO 9001:2015 Lead Auditor and Internal Auditor |
| 2. ASI Peer reviewer |
| 3. Safety & Health |
| 4. ISO 14001:2015 Standard |
| 5. RSPO Standards: RSPO P&C 2018 MY-NI 2019 |
| 6. MSPO Standards: MS 2530: 2013 part 1, 2, 3 and 4 |
| 7. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS |
| 8. HACCP MS 1480:2019 |
| 9. GAP Standard : Global GAP, Euru GAP |

Accompanying Persons:

| Name | Role |
|------|------|
| Nil | N/A |

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment.

| Date | Time | Subjects | нмм | MNM | MRM |
|-------------------------------|-----------------------|---|----------|----------|----------|
| Sunday, 29/5/2022 | PM | Audit team travel to Pantai Remis | ✓ | √ | ✓ |
| Monday, 30/5/2022 Day 1 | 9:00 AM - 9:30 AM | Opening meeting Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan | ✓ | √ | ✓ |
| UIE Estate | 9:30 AM - 12:30 PM | 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. | √ | √ | √ |
| | 12:30 PM - 1:30 PM | Lunch break | √ | √ | √ |
| | 1:30 PM - 4:30 PM | Document Review P1 – P7: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM, HCV records, SEIA documents & records, OSH records, review pay documents, | ✓ | ✓ | √ |

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| Date | Time | Subjects | нмм | MNM | MRM |
|--|------------------------|---|----------|----------|----------|
| | | records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.) | | | |
| | 4:30 PM - 5:00 PM | Auditors discussionDay 1 Interim Closing Briefing | ✓ | ✓ | ✓ |
| Tuesday, 31/5/2022 | 9:00 AM - 12:30 PM | Continue with field and/or facilities visitContinue with documents review | √ | √ | √ |
| Day 2 UIE Estate | 10:00 AM - 12:00 PM | Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.) | - | - | ✓ |
| | 12:30 PM - 1:30 PM | Lunch break | √ | √ | √ |
| | 1:30 PM - 4:30 PM | Continue with field and/or facilities visitContinue with documents review | √ | ✓ | ✓ |
| | 4:30 PM - 5:00 PM | Auditors discussionDay 2 Interim Closing Briefing | ✓ | ✓ | √ |
| Wednesday, 1/6/2022 Day 3 UIE Estate & UIE POM | 9:00 AM - 12:30 PM | UIE Estate:Continue with field and/or facilities visit (if any)Continue with documents review | √ | √ | √ |
| | 10:00 AM - 12:00 PM | Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.) | - | - | √ |
| | 12:30 PM - 1:30 PM | Lunch break | ✓ | ✓ | ✓ |
| | 1:30 PM - 4:30 PM | UIE POM: Document Review P1 – P7: SOPs, review on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation | √ | √ | ✓ |
| | 4:30 PM - 5:00 PM | Auditors discussionDay 3 Interim Closing Briefing | ✓ | ✓ | ✓ |
| Thursday, 2/6/2022 Day 4 UIE POM | 9:00 AM - 12:30 PM | Plant visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, lab, weighbridge, and palm product storage area etc. | √ | √ | √ |
| | 12:30 PM - 1:30 PM | Lunch break | ✓ | ✓ | ✓ |



| Date | Time | Subjects | нмм | MNM | MRM |
|---|-----------------------|---|----------|----------|----------|
| | 1:30 PM - 4:30 PM | Continue with plant and/or facilities visit (if any)Continue with documents review | ✓ | √ | √ |
| | 4:30 PM - 5:00 PM | Auditors discussionDay 4 Interim Closing Briefing | ✓ | √ | √ |
| Friday, 3/6/2022 Day 5 UIE POM | 9:00 AM - 12:30 PM | Document Review SCCS: RSPO SCC general requirements, supply chain for CPO mill, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records. | ✓ | √ | √ |
| | 12:30 PM - 2:00 PM | Lunch break and Friday prayer | ✓ | √ | √ |
| | 2:00 PM - 4:00 PM | Continue with plant and/or facilities visit (if any)Continue with documents review | ✓ | √ | √ |
| | 4:00 PM - 4:30 PM | Auditors discussionFindings report preparation | ✓ | √ | √ |
| | 4:30 PM - 5:00 PM | Closing meeting | | | |



Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

| Requirement | Assessment | Compliance |
|---|--|------------|
| Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company? | PT. Surya Sawit Sejati is a subsidiary company of United Plantations Berhad. PT Surya Sawit Sejati have operate 1 palm oil mill that supplied by 2 core estate (Lada estate and Runtu estate) and 1 scheme smallholders estate (Plasma Kumai and Arut). In Malaysia, United Plantations Berhad has newly acquired a piece of uncertified land (3,642ha) in Teluk Intan namely Tanarata Estate. The date of acquisition is 17th August 2019. | Complied |
| Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021 | The RSPO Initial Assessment has been carried out on 11-15th December 2017 on initial HGU areas and have successfully obtained RSPO certificate in November 2018 and Scope Extension Audit conducted in November 2019 for 6,717.62ha. In compliance with the RSPO P&C Certification System, it is anticipated to conduct the RSPO Scope Extension Assessment for Tanarata Estate within three (3) years from the date of acquisition, which is latest by 16th August 2022. Tanarata Estate will be the supply base of Jendarata Palm Oil Mill (RSPO Identity Preserved model) upon obtaining the RSPO certification. RSPO Membership Department was notified to proceed with the necessary protocols to include Tanarata Estate as an operating unit under United Plantations Berhad. Please be informed that there will be no new land clearing in the newly acquired plantation. | Complied |
| Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021. | No new acquisitions other than Tanarata Estate which was acquired in 2019 which already underwent an extension of scope assessment under UP Jendarata certification unit. | Complied |
| Any deviations from the maximum periods requires approval by the RSPO Secretariat. | No deviations from the maximum periods. The RSPO Initial Assessment has been carried out on 11-15th December 2017 on initial HGU areas and have successfully obtained RSPO certificate in November 2018 and Scope Extension Audit conducted in November 2019 for 6,717.62ha. In Malaysia, United Plantations Berhad has newly acquired a piece of uncertified land (3,642ha) in | Complied |

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| | Teluk Intan namely Tanarata Estate. The date of acquisition is 17th August 2019. | |
|---|--|----------|
| Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting? | No changes to the time-bound plan since the last audit. This is consistent with the latest ACOP 2020 report submitted to RSPO. | Complied |
| Have there been any isolated lapses in implementation of the plan? If yes a Minor noncompliance shall be raised | No isolated lapses in the implementation of TBP. | Complied |
| Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised | No fundamental failure to proceed with the implementation of TBP. 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). | Complied |
| Un-Certified Units or Holdings | | |
| No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12. | 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 submitted RaCP proposal and successfully obtained the approval on 4th October 2019. In 2014, the company has also conducted HCV identification for smallholder scheme area and Kumai Arut Conservation Area for the area of 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. Based on RSPO RaCP Tracker Website link as following: | Complied |



| | https://www.rspo.org/certification/remediation- and-compensation/racp-tracker#growerTracker There is 1 management unit (MU) with potential liability with LUCA submitted. LUCA review completed with Concept Note (CN) required has been submitted and approved. Compensation Plan (CP) has been submitted and endorsed. | |
|--|--|----------|
| Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure. | 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 submitted RaCP proposal and successfully obtained the approval on 4th October 2019. | Complied |
| 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 4.4, 4.5, 4.6, 4.7 and 4.8. | 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. As of the date of the report being produced, there is no latest complaint except for one submitted on 21/10/2012 that has been closed as per RSPO Complaints Website link as following: https://askrspo.force.com/Complaint/s/case/5009 0000029w2ZvAAI/detail | Complied |
| Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2 | 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. As of the date of the report being produced, there is no complaints related to labour disputes that | Complied |



| | requires action by Unite Plantations except for one submitted on 21/10/2012 that has been closed as per RSPO Complaints Website link as following: https://askrspo.force.com/Complaint/s/case/50090000029w2ZvAAI/detail | |
|---|--|----------|
| Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1 | 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 trough procedure No: SOP-HRD-017-R00. As of the date of the report being produced, there is no complaints related to legal non-compliance that requires action by United Plantations except for one submitted on 21/10/2012 that has been closed as per RSPO Complaints Website link as following: https://askrspo.force.com/Complaint/s/case/50090000029w2ZvAAI/detail | Complied |
| Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified. | Yes. The company has conducted the annual internal audit by the Sustainability Team and the report has covering all the criterion to be complied with the corrective action taken. All PT. Surya Sawit Sejati has conducted annual RSPO internal audits periodically. Internal auditors have also conducted annual RSPO internal audits for Tanarata Estate on 10th July 2020. The positive assurance statement was made available in the internal audit report that the business units are in compliance with RSPO P&C. | Complied |
| Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO? | No Critical (Major) non-compliance raised against any of those RSPO P&C criterion. | Complied |
| Have there been any stakeholder (including NGO) consultation conducted? | Stakeholder Consultations are conducted regularly to include workers, suppliers, contractors, NGO's, Government Bodies Neighbouring estates and smallholders. Stakeholder comments are recorded in the Stakeholder Meeting Minutes. No negative comments were obtained from the stakeholders except for suggestions and recommendation taken into consideration by the company. | Complied |



3.2 Progress of scheme smallholders and/or outgrowers

| 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? | Not applicable as no scheme smallholder for UIE Estate. | Not Applicable | | | | | | | |
| 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. | | | | | | | | | |



Approved Time Bound Plan

PT Surya Sawit Sejati (PT SSS) is a subsidiary Company under United Plantations Berhad and 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 Pengunaan 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 untill 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 4,773.66ha* 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 Penamanan Model/BKPM. (*original GIS calculation=4,717.03ha, current SK 529/2012 = 4,773.66ha)

PTSSS has appeared for Initial RSPO Assessment for the balance of 713.47ha on 11th to 14th December 2017 and successfully obtained the RSPO certificate in November 2018 with conditional approval due to pending approval of HCV Remediation and Compensation Plan (RaCP). The concept note was approved in February 2018 and the final RaCP Annex 8 was successfully approved by the RSPO HCV Compensation Panel and external evaluator appointed by RSPO Secretariat on 4th October 2019.

The long overdue HGU for 6,004.15 ha was received on 12th March 2018. In view of no pending non-compliance (NC on pending RaCP successfully closed), RSPO Scope Extension Assessment now proceed for the HGU newly acquired area of 6,004.15 along with RSPO Annual Surveillance Assessment 1 for 713.47ha.

The time bound plan for all of the areas being certified are in tandem with the hectarage issued with the HGU certificates by the Government of Indonesia. The balance portion pending HGU are in the land swap phase and its HGU issuance is beyond their control. However, this is expected by 2023. For their Plasma scheme smallholders, full certification is expected by 2023 subject to the issuance of individual land certificates by the local Government.

In Malaysia, United Plantations Berhad has newly acquired a piece of uncertified land (3,642ha) in Teluk Intan namely Tanarata Estate. The date of acquisition is 17th August 2019. In compliance with the RSPO P&C Certification System, it is anticipate to conduct the RSPO Scope Extension Assessment for Tanarata Estate within three (3) years from the date of acquisition, which is latest by 16th August 2022. Tanarata Estate will be the supply base of Jendarata Palm Oil Mill (RSPO Identity Preserved model) upon obtaining the RSPO certification. RSPO Membership Department has been notified and necessary protocols to include Tanarata Estate as an operating unit under United Plantations Berhad proceeded. Please be informed that there will be no new land clearing in the newly acquired plantation.



| Name of the Unit of | Country | Name of the Mills | Location Address | | ordinates nal degree) | Total Managed | Certification Status | Plan Year for Certification | Actual Certification | Date of Last TBP | (Oi | REVISION (| | de) |
|---|-----------|---|---|----------|--------------------------|------------------|---|---|-------------------------|--------------------------------------|---|--|---|-------------------------------------|
| Certification (UoC) | | and Supply Bases | | Latitude | Longitude | Area (Ha) | (Certified / Not certified) | | Year | Verified and Approved by CB | Any revision from the last approved TBP? (Yes / No) | New Proposed Year for Certification | Justification of changes for each UoC | Date of approval from RSPO |
| United Plantations Berhad/PT Surya Sawit Sejati | Indonesia | Lada POM | Pangkalan Lada Sub- District, Kotawaringin Barat District, Kalimantan Tengah Province, Indonesia. | S2.5866° | E111.7644° | 6,717.62 | Certified | Fully certified by 2023 depending on the HGU newly obtained area. | 2019 | September 2021 by BSI | No | | | May 2021 via ACOP |
| United Plantations Berhad/ Jenderata POM | Malaysia | Jenderata POM – Tanarata Esate | Jalan Kuala Selangor – Teluk Intan, Jendarata Estate 36009, Teluk Intan, Perak, Malaysia | N3.6524° | E101.0172° | 3,641.82 | Gone through certification audit in June 2022 by BSI | 2022 | - | Dec 2022 | No | | | May 2021 via ACOP |



3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During this Assessment there were one (1) Critical; one (1) Minor nonconformities and two (2) Opportunity For Improvement raised. The United Plantations Berhad UIE Palm Oil Mill and Estate 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 action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

| Non-conformity | | | | |
|--|---|--|--------------------------|--|
| NCR Ref # | 2206324-202205-M1 Issued Date 3/6/2022 | | | |
| Due Date | 1/9/2022 | Closure Date | 29/8/2022 | |
| Indicator & Category (Critical / Minor) | 3.6.1 (Critical) | | | |
| Statement of Nonconformity: | Implementation of docume insufficient. | nted mitigation plans related | I to Permit To Work was | |
| Requirement Reference: | All operations are risk ass procedures are documented | sessed to identify H&S issued and implemented. | es. Mitigation plans and | |
| Objective Evidence: | UIE POM establish Safe Operating Procedure (SOP UIED 053) for Confined space in the storage tank where Authorized Entrant must declare that he is fit to perform the job by filing in Health declaration form. However during verification found no record of health declaration for PTW implementation, dated 7/1/2022 CPO storage tank cleaning. | | | |
| | These indicated the implementation of documented mitigation plans related to Permit To Work was insufficient. Hence a non-conformity has been raised. | | | |
| Corrections: | The SOP for confined space has been revised to reflect the requirement which shall be implemented on the ground. The workers who involved in the storage tank cleaning have been sent to OHD and certificates received. | | | |
| Root Cause Analysis: | The management was not aware of the importance to include the requirement on OHD in the SOP. | | | |
| Corrective Actions: | Training has been conducted by the mill management to the executives, staff and supervisor involved in confined space. | | | |
| Assessment Conclusion: | Since Major NC was considered as low risk due only 1 objective evidence found and corrective action is related to training which can be verified offsite, CAP evidences has been submitted via email as following: - The SOP for confined space has been revised to reflect the requirement which shall be implemented on the ground; SOP UIED 037; HRC 038; Rev. 0; 2022 - The workers who involved in the storage tank cleaning have been sent to OHD and certificates received; Health Fitness Certificate & Medical Examination Checklist for Working in Confined Space; Date: 3/6/2022 | | | |



| - Training has been conducted by the mill management to the executives, staff and supervisor involved in confined space; Training date: 7/6/2022 |
|---|
| Based on the evidences submitted, CAP was verified to be effective to address the issue. Hence, Major Nonconformity has been closed on 29/8/2022. |

| Non-conformity | | | | | |
|--|--|--------------------------------|----------------------|--|--|
| NCR Ref # | 2206324-202205-N1 | | | | |
| Due Date | Next assessment Closure Date N/A | | | | |
| Indicator & Category (Critical / Minor) | 3.3.2 (Minor) | | | | |
| Statement of Nonconformity: | Mechanism to check cor compliance was insufficient | nsistent implementation of | procedures to ensure | | |
| Requirement Reference: | A mechanism to check cons | sistent implementation of prod | cedures is in place. | | |
| Objective Evidence: | Directive from head of Group Manager Human Resources, Sustainability and Safety sighted dated 27/07/2018 stated that inspections on all areas within the mill/estate concession are to be carried out in weekly basis and to be verified by Manager/Head of Department. | | | | |
| | Line inspection checklist format is available and documented in the "Weekly inspection of workers and staff quarters, shophouses and office/mill complex". As per checklist, line site inspection needs to be conducted for specific parameters inside and outside the housing area in-line with applicable requirements of Workers Minimum Housing and Amenities Standard Act 1990. | | | | |
| | However, verification on the Line site inspection records done by hospital assistant for February 2022 on weekly basis and reported in the "Line site inspection logbook" instead of checklist established. Inspection also did not cover inside the workers house. | | | | |
| | Furthermore, it was observed during site visit at terrace housing (100 units) at house E4: | | | | |
| | - Modification of ceiling fan wiring was made by the occupant. Based on interview he acknowledged that the wiring was modified by himself not by the licensed wireman/electrician. | | | | |
| | - Working tools such as motorized cutter @ CANTAS were kept in the house. Fuel @ petrol was also found in the house in white jerrycan. | | | | |
| | These indicated the mechanism to check consistent implementation of procedures to ensure compliance was insufficient. Hence a non- conformity has been raised. | | | | |
| Corrections: | - The checklist for worker quarters inspection has been revised and circulated to all business units in UP Group. | | | | |
| | - The Estates Director has briefed the UIE team on immediate attention to heightened the worker quarter inspection for interior and exterior of worker houses. | | | | |
| | - The HRSS Department has re-submitted the proposal to the Chief Executive Director on the installation of ceiling fan in worker quarters. | | | | |
| Root Cause Analysis: | The monitoring of illegal wiring, petrol and working tools storage in the house was not specified in the existing checklist for worker quarters inspection. | | | | |



| Corrective Actions: | The sustainability team will monitor and ensure all Hospital Assistants and estate management utilize the latest checklist for worker quarters inspection. | | | |
|----------------------------|--|--|--|--|
| Assessment Conclusion: | CAP has been accepted. The implementation will be evaluated in the next surveillance audit. | | | |

| Opportunity for Improvements | | | |
|------------------------------|--|--|--|
| OFI# | Description | | |
| 2206324- 202205-I1 | 7.12.4: Management plan to protect and/or enhance HCVs within UIE Estate 1B mainly for the river banks of Sg. Beruas Riparian Self-Conservation area near Canal A could be further improved. | | |
| 2206324- 202205-I2 | 6.2.4: Electricity has been provided by the management with subsidy total RM6.54 per house. It can be further improved to include details of electric subsidy in the employment contract. | | |

| Positive Findings | | | |
|-------------------|--|--|--|
| PF# | Description | | |
| PF 1 | Good cooperation among the team. | | |
| PF 2 | Good document retrieval. | | |
| PF 3 | Positive feedbacks from interviewed external stakeholders. | | |

3.3.1 Status of Nonconformities Previously Identified and Observations

| Non-conformity | | | | |
|--|--|--------------|-----------|--|
| NCR Ref # | 1952877-202008-N1 | | | |
| Due Date | Next surveillance assessment | Closure Date | 22/9/2021 | |
| Indicator & Category (Critical / Minor) | 3.3.2 (Minor) | | | |
| Statement of Nonconformity: | The mechanism to check consistent implementation of procedures were not effective. | | | |
| Requirement Reference: | A mechanism to check consistent implementation of procedures is in place. | | | |
| Objective Evidence: | 1. Expired PPE was given (a) to Auditor (manufactured date July 2007) and (b) to some of those mill and estate workers interviewed - 2 from mill and 2 from estate (manufactured date May 2015 and November 2017). | | | |
| | 2. Chemical Store practice double standard when applying the use of PPE was evidenced. Auditor was required to don N95 mask prior to entering the store whereas, the S AM don it much later after entering and the Pre-Mixer wore his Respirator almost at the end of interview session. | | | |
| | 3. Unlabelled chemical containers at Laboratory. | | | |
| Corrections: | 1. As immediate action, the management had placed order for 70 units (first batch) of new safety helmets. The management had identified the workers who possess | | | |



| | expired s | afety helmet | s and will | issue the brand | new helmet or | nce receive the |
|--|---|--|-------------|-------------------|-----------------|------------------|
| | The estate management has immediately briefed standardized practice and provided appropriate PPEs to all chemical handlers. | | | | | |
| | 3. All second | dary containe | ers have be | en labelled with | the name of cor | ntent. |
| Root Cause Analysis: | 1. Lack of a | wareness on | the expiry | date for safety h | elmet. | |
| | 2. Lack of standardized guideline on issuance of appropriate PPEs for chemical premix operators and store keepers. | | | | | |
| | 3. Lack of a labelled. | wareness an | d supervis | ion to ensure the | chemical filled | containers are |
| Corrective Actions: | A management procedure on PPE and checklist on inspection of safety harness and safety helmet have been developed to record and monitor the expiry date of safety helmet. To conduct training for store keeper, Mandores, mill supervisors, staff and management team on the monitoring of expiry date for various PPEs. To incorporate standardize practice on appropriate PPEs for chemical premix | | | | | |
| | | and store ke | • | | utc 11 L3 101 C | icilical picilix |
| | 3. To revise SOP for laboratory to incorporate statement on "chemicals filled containers must be labelled with the name of content." The mill management will conduct SOP training for lab attendants particularly on the labelling all chemical filled container. | | | | | |
| Assessment Conclusion: | As per verific | cation on: | | | | |
| | - PPE Management procedure and implementation of checklist monitoring on PPE | | | | | |
| | expiry date showed no PPE expired as per record. The management also conduct the training on 1/3/2021 and 20/3/2021 to ensure the workers and staff aware regarding PPE SOP, this awareness also alert regarding the expiry of the PPE. Thus Minor NC was close accordingly. | | | | | |
| Effectiveness Closure (for previous audit closed Critical NC): | RAV 2 2022 verification: PPE issuance record was available sampling on PPE issuance record for Trunk Injection record as per below:- | | | | | |
| | Name | Welington | n shoes | Rubber glove | 3m Mask | Apron |
| | Balkil | 21/1/22 | | 4/5/22 | 4/5/22 | 21/1/22 |
| | Barun | 11/5/22 11/5 | | 11/5/22 | 17/1/22 | 17/1/22 |
| | Moinudin 12/11/21 6/5/2022 | | 6/5/22 | 6/5/22 | | |
| | | | | | | |
| | Records of training maintained as per sample sighted as following: | | | | | |
| | Training | Training Participant I | | Date | | |
| | Company policies | sustainable All employees estate & mill 8 to 15/1/2022 & external stakeholders | | | | |
| | Trunk injecti | njection training Relevant 20/1/2022 workers/operators, mandores and staff | | | | |



| Field clinic – safety in chemical spillage/store/scheduled waste | Relevant workers/operators, mandores and staff | 17/5/2022 | |
|---|--|-----------|--|
| Chemical safety handling | Mill lab operators | 20/3/2022 | |
| Verifications found the mechanism to ensure compliance of the issue raised previously as Minor NC were found sufficient. Notwithstanding, there was another issue found during this assessment hence a Minor NC has been raised. No escalation to Major since this previous Minor NC has been verified for closure in previous remote assessment. | | | |

| Opport | Opportunity for Improvement | | | |
|--------|---------------------------------------|--|--|--|
| OFI# | # Description | | | |
| OFI 1 | OFI Statement: Nil | | | |
| | Verification / Follow-up actions: N/A | | | |

3.3.2 Summary of the Nonconformities and Status

| CAR Ref. | Category (Critical / Minor) | P&C Indicator | Issued Date | Status & Date (Closure) |
|-------------------|--------------------------------|------------------|-------------|-------------------------|
| 1648250-201804-M1 | Major | 2.1.1 | 21/06/2018 | Closed on 17/08/2018 |
| 1788381-201904-N1 | Minor | 2.1.4 | 13/06/2019 | Closed on 04/09/2020 |
| 1788381-201904-N2 | Minor | 4.1.3 | 13/06/2019 | Closed on 04/09/2020 |
| 1952877-202008-N1 | Minor | 3.3.2 | 4/09/2020 | Closed on 22/09/2021 |
| 2206324-202205-M1 | Critical | 3.6.1 | 3/6/2022 | Closed on 29/08/2022 |
| 2206324-202205-N1 | Minor | 3.3.2 | 3/6/2022 | Open |

3.4 Stakeholders and previous land owner / user 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 United Plantations Berhad UIE Palm Oil Mill and Estate 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 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.



| Stakeholders contacted | | | | |
|--|--|--|--|--|
| Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities) | Stakeholder name / organization | Means of communication (e.g. face to face interview, email, phone interview, comment from public notice) | | |
| Government Officers | Labour Department, SitiawanDepartment of Environment, Teluk Intan | Phone calls | | |
| Community/neighbouring village representatives | Kg. Matang AchehLadang Gelung PepuyuKg. Kedah | Face to face interview | | |
| Suppliers/Contractors/Vendors | Sundry shop Canteen Supermandores | Face to face interview | | |
| Worker's Representative/Gender Committee | Estate workers Mill operators Gender representative | Face to face interview | | |

| Stake | eholders comment | | |
|-------|---|--|--|
| 1 | Feedbacks: | | |
| | Village representatives (JPKK Kg Matang Acheh and Kedah) – There were some feedbacks from the representatives with regards to road access and job vacancy information/advertisement to the villagers. They also not aware who is the person in charge for the estate/mill and process to submit feedback/request/complaint. | | |
| | Audit Team verification and response: | | |
| | No further issue. | | |
| 2 | Feedbacks: | | |
| | Supermandore/Contractors – They informed that the payment was made promptly. They are aware of the complaint procedure and so far, they have no issue with the management. | | |
| | Audit Team verification and response: | | |
| | No further issue. | | |
| 3 | Feedbacks: | | |
| | Gender Committee Representatives – No sexual harassment or violence case reported during the time of assessment. They are aware of the function of the committee and informed that no discrimination from the management regardless of gender. | | |
| | Audit Team verification and response: | | |
| | No further issue. | | |
| 4 | Feedbacks: | | |
| | Guest Workers Representative – The workers are satisfied with the management and they informed that their wages have achieved Minimum Wage Order 2020. They are aware of the complaint procedure and they can voice out any issues with the management through Guest Workers Meeting. All deduction made | | |



| | in the nevel in were made aware by them. No discrimination from the management in terms of ich/hady |
|---|---|
| | in the payslip were made aware by them. No discrimination from the management in terms of job/task offered and treatment to all workers. |
| | Audit Team verification and response: |
| | No further issue. |
| 5 | Feedbacks: |
| | Sundry shop/canteen: Reasonable and affordable fees charged to the tenants and contracted on annual basis. Foods and groceries price have to be displayed and regular inspection by management as to ensure price is affordable to all workers. |
| | Audit Team verification and response: |
| | No further issue. |
| 6 | Feedbacks: |
| | Labour Department: A phone call made with the officer from Sitiawan office, Puan Yusza. A few issues have been discussed with the officer with regards to implementation of Minimum Wages Order 2022 and type of approved deduction in the payslip. UPB has obtained a blanket approval from JTK, ref: (6) dlm BHG PU/9/129 dated 1/6/12 and the permit is remained valid. Deduction such as for cooking oil supplied from UP's own refinery (UNITATA) with subsidize price does not required a specific permit. Minimum Wages of RM1500 per month effective from 1/5/2022 and for a company that employed less than 5 workers, a grace period until 1/1/2023 is given before in compliance with Minimum Wages Order 2022. Previous Minimum Wages Order 2020 is still applied until the cut-off date. |
| | Audit Team verification and response: |
| | No further issue. |
| 7 | Feedbacks: |
| | Department of Environment: A phone call made with the officer from Teluk Intan office, Puan Hidayah. Based on the records (field citation report), no legal non-compliance issues reported so far. UIE Palm Oil Mill has continued to comply with EQA 1974 specifically stipulated under UIE Palm Oil Mill's compliance schedule. |
| | Audit Team verification and response: |
| | No further issue. |

| List of land owner / user contacted | | | | | |
|-------------------------------------|---------------------------|-------------------|-------------------------|---------------------------------------|--|
| Name | Years of ownership / used | Land area (ha) | Agreement (Yes / No) | Agreement base on FPIC (Yes/No) | Compliance on the agreement terms and conditions |
| UIE Estate | Third cycle replanting | 10,365.20 | S&P | No | Not applicable |

Note:

- One cycle of oil palm planting ranged between 25 -30 years depends on yield. Current third replanting age of oil palm for UIE Estate is 8 years minimum.

| Previou | Previous land owner / user comment | | |
|---------|------------------------------------|--|--|
| Nil | Feedbacks: N/A | | |



Audit Team verification and response: N/A

3.5 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that United Plantations Berhad UIE Palm Oil Mill and Estate certification unit has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that United Plantations Berhad UIE Palm Oil Mill and Estate certification unit is remain certified.

| Report prepared by | Acceptance of Assessment Conclusion |
|---|---|
| Name: Hafriazhar Mohd. Mokhtar | Name: Lee Kian Wei |
| Company Name: BSI Services Malaysia Sdn. Bhd. | Company Name: United Plantations Berhad |
| Title: Lead Auditor | Title: Sustainability Manager |
| Signature: | Signature: (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.) |
| Date: 29/8/2022 | Date: 01/09/2022 |



Appendix A: Summary of Findings

| Criterion / Indicator | | Assessment Findings | Compliance | |
|-----------------------|---|---|------------|--|
| Princip | Principle 1: Behave ethically and transparently | | | |
| | Criterion 1.1: The unit of certification provides 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 | (C) Documents that are specified in the RSPO P&C are made available to the public Critical (Major) compliance - | Based on notification by UPB's CEO Dato' Carl Bek Nielsen; Dated 11/1/2014, policy and documents that can be publicly made available are as following: a) Land titles/user rights b) Occupational health and safety plans c) Plans and impact assessments relating to environment and social impacts d) HCV documentations e) Pollution prevention and reduction plans f) Details of complaints and grievances g) Continuous improvement plans h) Public summary of certification assessment report i) Human Rights Policy It was specified that the company's SOP and Field Management Manuals are confidential documents and are guidelines for various operations. The contents must not be disclosed to any third party without authorization by the company | Complied | |
| 1.1.2 | Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance - | As per interview with stakeholders, information has been provided in Bahasa Malaysia and English. Stakeholders handbook also has | Complied | |

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| | | been established in 6 different languages which contain information that related to United Plantation Berhad such as policy, procedure. | |
|-------|--|---|----------|
| 1.1.3 | (C) Records of requests for information and responses are maintained Critical (Major) compliance - | Records of any request documented in form "Stakeholders logbook" together with complaint received. Sighted that records maintained since 2021. There is no request received in 2021 and 2022. | Complied |
| 1.1.4 | (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance - | UP Downriver Business Unit implemented the company's documented Internal Grievance Redressal Procedure and External Grievance Redressal Procedure as part of Consultation and Communication procedures. As per interview with the stakeholders, it has been confirmed that the management has explained the consultation and communication procedure to them. | Complied |
| | | Training for consultation and communication procedure conducted for stakeholders on 12/05/2022 with attendance of 13 stakeholders. While for workers, it has been conducted base on workstation. Sample taken kernel plant training on 25/03/2022 and boiler house on 11/02/20202 | |
| 1.1.5 | There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance - | List of stakeholders for UIE Estate documented in the list title "Stakeholders list 2022" UIE last updated 03/03/2022 and while for UIE POM documented in document "Stakeholders list for 2022 UIE Engineering Department" updated on 03/03/2022. List categorized into different category such as government bodies, NGOs, supplier, neighboring community, plantations. | Complied |
| | | Stakeholders consultation conducted on 12/05/2022 with attendance of 13 stakeholders for both stakeholders from UIE estate and UIE POM. Sample of issues discussed during the meeting is contribution of the management to local communities, basic amenities and facilities that provided to the workers and management effort to resolve commit suicides cases for foreign workers. | |



| 1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance - Monitoring of compliance and the implementation of the overall ethical business practice component in the processor of the policy and overall ethical business practice component in the processor of the policy and overall ethical business practice component in the processor of the policy and overall ethical business practice component in the processor of the policy and overall ethical business practice component in the processor of the policy and overall ethical business practice component in the processor of the policy and overall ethical business practice component in the processor of the policy and overall ethical business practice component in the processor of the policy and overall ethical business practice component in the processor of the policy and overall ethical business practice component in the processor of the policy and overall ethical business practice component in the processor of the policy and overall ethical business practice component in the processor of the policy and overall ethical business practice component in the processor of the processor of the policy and overall ethical business practice component in the processor of the policy and overall ethical business practice. Carl Bek-Nielsen which stated that the processor of the policy and overall ethical business practice component in the processor of the policy and overall ethical business practice component in the processor of the policy and overall ethical business practice component in the processor of the policy and | business ethics document in Berhad, code of conduct and 19 and signed by the chief sen. Stated in the policy the and employees expected to I interest which would be group. | Complied |
|---|---|----------|
| victimization for whistleblowing. | eriodically by sustainability audit which was latest done litional, the management 4/12/2019 signed by Dato ne management encourage | Complied |
| Principle 2: Operate legally and respect rights | | |

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| 2.1.1 | (C) The Unit of Certification complies with legal requirements - Critical (Major) compliance - | UIE Certification Unit is committed to compliance with all applicable local, national and ratified international laws and regulations. Among permit and license sampled were: |
|-------|--|--|
| | | - MPOB license 502076202000 valid from 1/8/2021 until 31/7/2022 |
| | | - JTK License for wages deduction dated 30/8/2008 was available. |
| | | - License from Energy Commission (license no: 2021/02050) valid until 20/10/2022 |
| | | - MPOB license 500124504000 for transfer and sold also milling available and valid from 1/2/2022 until 31/1/2023. |
| | | - Certificate of fitness for Sterilizer PK PMT 4586 valid until 15/2/2023 |
| | | - Certificate of fitness for Vertical air receiver/vacuum tank was available and valid until 15/2/2023 |
| | | - Poison license for Sodium Hydroxide (007815) valid until 31/12/2022 for Liquid 3000 kg for boiler water treatment. Register no> AC0062/2022. |
| | | - License for Diesel (47,000 liter) and Petrol (15,000 liter) as per license NJG/SK/D/04 valid until 24/8/2024. |
| | | There was Periodical Inspection Examination and Testing of LEV System (Ref. no: HQ/15/JHII/00/206-2021/013) dated 20/4/2021. Result as per below:- |
| | | Fume Hood Recommended Results Results |
| | | Average Face Minimum 0.25 0.61 m/s accept Velocity m/s |

| 2.1.2 | A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. - Minor compliance - | Document titled Mechanism for Tracking Changes in Law; revised on 2/5/2022 was available for verification. UP UIE Sustainability Unit Team will update the legal register if any new regulation or if there is amendment in the legal and will distribute it to each operating unit. | Complied |
|-------|---|--|----------|
| | | There are 3 new laws have been captured in UP UIE registered as per below: - | |
| | | - Employment Act (Amendment) 2022 (Act 1651) | |
| | | - Minimum wages order 2022 | |
| | | - Occupational Safety And Health (Amendment) Act 2022 | |
| | | The sustainability team then issues the changes to all operating units to update existing records. Then the estate management implements applicable changes in law accordingly. The sustainability team monitors the implementation/updating of information via RSPO, MSPO & ISCC Internal Audits. | |
| 2.1.3 | Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance - | All operating units have established the legal boundary based on the land title that they possess. The boundary have been demarcated with boundary stones, boundary markers, security trenches and security fences. Visit to the mill and respective estate's boundary were verified as below: UIE Estate | Complied |
| | | The estate is surrounded by other estates and villages. Visited the Estate Boundary at Field 109 with Perbadanan Islam Negeri Perak. White and Blue poles were placed at the boundaries indicating the legal boundary of the estate with the others. | |

| 2.2.1 | A list of contracted parties is maintained Minor compliance - | List of contracted parties is maintained under stakeholder list dated 6/4/2022. From the list there are 3 contractors for CPO transporter listed under stakeholder list as per below: Sri Naresh Agency - Uji Sakti Sdn Bhd - Sakthy Transport Sdn Bhd | Complied |
|----------|---|---|----------|
| 2.2.2 | All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance - | All contracts (short and long term), contain specific clauses on meeting applicable legal requirements were spelled out in the contract. The term contract of work sampled:- Agreement for Transport of Crude Palm Oil; Agreement date: 01/01/2022 between Uji Sakti Sdn Bhd (Transporter) and United Plantations Berhad. | Complied |
| 2.2.3 | All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. - Minor compliance - | Agreement for Transport of Crude Palm Oil; Agreement date: 01/01/2022 between Uji Sakti Sdn Bhd (Transporter) and United Plantations Berhad already contain clauses disallowing child, forced and trafficked labour. | Complied |
| Criterio | on 2.3: All FFB supplies from outside the unit of certification are from legal | sources. | |
| 2.3.1 | (C) For all directly sourced FFB, the mill requires: Information on geo-location of FFB origins Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license Critical (Major) compliance - | All directly sourced FFB are from UPB's own estates. Information of each estates detailed out under table 4 & 5 of the report. | Complied |

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| 2.3.2 | For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1. - Minor compliance - | No indirectly sourced FFB as UIE POM is under Identity Preserved module. | Complied |
|----------|---|--|------------------|
| Princip | le 3: Optimise productivity, efficiency, positive impacts and resilie | nce | |
| Criterio | on 3.1: There is an implemented management plan that aims to achieve lor | ng-term economic and financial viability. | |
| 3.1.1 | (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance - | UIE Estate business plan is documented as per Annual Budget 2023, 2024 & 2025; Operating Revenue & Total Working Profit and Crop Projection for Year 2016 -2027. UIE Palm Oil Mill business plan is documented as per Annual Budget 2023, 2024 & 2025; Operating Revenue & Total Working Profit and Crop & Cost Comparison for Year 2023 -2025. | Complied |
| 3.1.2 | An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance - | Latest previous replanting was conducted on 2010. Earliest next replanting expected in year 2035. Hence, no projection for the next five years. | Complied |
| 3.1.3 | The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance - | As per MSPO & RSPO Internal Audit Report; Business Unit: United Internal Enterprise (UIE) Estate & Engineering Department (POM); Date: 18-19/4/2022. Latest UIE Estate and UIE POM Sustainability Management Review for 2022; Minutes of Meeting; Date: 18/5/2022. | Complied |
| | on 3.2: The unit of Certification regularly monitors and reviews their econor demonstrable Continuous improvement in key operations. | mic, social and environmental performance and develops and impleme | nts action plans |
| 3.2.1 | (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance - | | Complied |

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| F: | | , | |
|-------|---|--|----------|
| | | new school bus purchased in year 2014 and new ambulance purchase in year 2015. New construction of housing completed in 2014 and another batch in 2022. | |
| | | As per Sustainability & Continuous Improvements UIE Business Unit 1/1/2016 to 31/12/2026; Updated 10/5/2022 for both UIE Estate and UIE POM including the following: | |
| | | - Reduction in chemicals: insecticides, fungicides & herbicides A.I (kg/ha) | |
| | | - Substitution of Monocrotophos to Acephate | |
| | | - IPM expansion | |
| | | - Domestic water quality monitoring | |
| | | - Discharged water quality monitoring | |
| | | - Dust emission (boiler) improvement | |
| | | - Methane gas capture expansion | |
| | | - POME application to fields expansion | |
| | | - Decanter cake application expansion | |
| | | - Biogas to grid project | |
| | | - Screen trap for all compound drains | |
| | | - Biodiversity conservation - local fruit & jungle trees planting | |
| 3.2.2 | As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template]. | RSPO metrics template submitted was verified its data to be consistent and reflective of raw data sources for both UIE POM and UIE Estate. | Complied |
| | PROCEDURAL NOTE: | | |
| | The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. | | |

| | Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required. - Minor Compliance - | | |
|----------|--|--|--------------------|
| Criterio | on 3.3: Operating procedures are Appropriately documented, consistently im | plemented and monitored. | |
| 3.3.1 | (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.- Critical (Major) compliance - | UIE Estate adopted United Plantations Berhad Field Management Manual which includes operational manuals latest updated on 29/12/2004 on Administration (A1), Oil Palm Field (B1-B7), Weeding (D), Water Management (E) and supplements including Soils & Nutrition (S1), Integrated Pest Management (IPM – S2), Pests & Disease (S3) and Safe Use of Pesticides (S4). The Oil Palm operation manual covering all activities including Land Preparation, Nursery Practice, Field Planting, Upkeep Immature, Upkeep Mature, Pollination and Harvesting. | Complied |
| 3.3.2 | A mechanism to check consistent implementation of procedures is in place. - Minor Compliance - | Mechanism to check consistent implementation of procedures is in place that involved checking which includes the following: Internal audits as per MSPO & RSPO Internal Audit Report; Business Unit: United Internal Enterprise (UIE) Estate; Date: 18/4/2022 Agronomic visit on culling activity conducted by United Plantations Research Department (UPRD) dated on 26/4/2022 as per report ref. # 1.984/746/2022. Latest visit by Research Controller on Additional Guidelines for Efficient Nutrient Management for Oil Palm and Coconuts as per report ref. # 9.000/860/2022; Date: 17/5/2022 EXCOM Visit by Chief Executive Director as per Report ref. # LHP/sss/111/22; Date: 17/5/2022 UPB Director of Engineering Upstream UIE Mill Visit; Date: 12/4/2022 | Non- compliance |



 Environmental Third Party Audit by DPKR Consults Services as per Environmental Third Party Audit Report; Ref. # DPKR/1221/5050; Audit date: 22/12/2021; Report date: 5/1/2022

Directive from head of Group Manager Human Resources, Sustainability and Safety sighted dated 27/07/2018 stated that inspections on all areas within the mill/estate concession are to be carried out in weekly basis and to be verified by Manager/Head of Department.

Line inspection checklist format is available and documented in the "Weekly inspection of workers and staff quarters, shophouses and office/mill complex". As per checklist, line site inspection needs to be conducted for specific parameters inside and outside the housing area in-line with applicable requirements of Workers Minimum Housing and Amenities Standard Act 1990.

However, verification on the Line site inspection records done by hospital assistant for February 2022 on weekly basis and reported in the "Line site inspection logbook" instead of checklist established. Inspection also did not cover inside the workers house.

Furthermore, it was observed during site visit at terrace housing (100 units) at house E4:

- Modification of ceiling fan wiring was made by the occupant. Based on interview he acknowledged that the wiring was modified by himself not by the licensed wireman/electrician.
- Working tools such as motorized cutter @ CANTAS were kept in the house. Fuel @ petrol was also found in the house in white jerrycan.

| | | These indicated the mechanism to check consistent implementation of procedures to ensure compliance was insufficient. Hence a non- conformity has been raised. | |
|-------|---|--|----------|
| 3.3.3 | Records of monitoring and any actions taken are maintained and available. - Minor Compliance - | Records of monitoring and actions taken are maintained and available as per sample as following: - Effluent Water Sample Certificate of Analysis; Ref. # 09J0427; Lab # WA-UPB-0015/21; Date: 2/10/2021 by Union Laboratories Sdn. Bhd.; BOD (3 days @ 30°C): 7.9 mg/l - Effluent Water Sample Certificate of Analysis; Ref. # 07J0112; Lab # WA-UPB-0010/21; Date: 28/7/2021 by Union Laboratories Sdn. Bhd.; BOD (3 days @ 30°C): 8.0 mg/l - Environmental Monitoring - Boundary Noise; Report ref. # MURNI/1221/5062; Monitoring date: 29-30/12/2021; Report date: 11/1/2022 by CSK Murni Services Sdn. Bhd. - Scheduled Waste Disposal Consignment # 20210311130J7VU5; Waste code: SW410; Date: 11/3/2021; Transporter/Receiver: Edsha Solutions Sdn. Bhd.; Quantity: 0.47 mt - Scheduled Waste Disposal Consignment # 2021061517QPNSXI; Waste code: SW306; Date: 15/6/2021; Transporter/Receiver: SP Metro Sdn. Bhd.; Quantity: 1.00 mt - Scheduled Waste Disposal Consignment # 2021102518XUF7HG; Waste code: SW102; Date: 25/10/2021; Transporter/Receiver: Yokohama Reclamation Sdn. Bhd.; Quantity: 0.43 mt | Complied |
| | | - Scheduled Waste Disposal Consignment # 2021111309BURA08; Waste code: SW322; Date: 13/11/2021; Transporter/Receiver: Primochem Sdn. Bhd.; Quantity: 0.2175 mt | |

| | | - Isokinetic and Air Emission Monitoring & Dark Smoke Observation Report; Report ref. # MURNI/0421/4785; Monitoring Date: 20/4/2021; Reporting Date: 30/4/2021 by CSK Murni Services Sdn. Bhd.; Dust concentration test results: 75 mg/m ³ |
|--------|---|---|
| | 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA ent and monitoring plan is implemented and regularly updated in ongoing the second s | λ) is undertaken prior to new plantings or operations, and a social and environmental operations. |
| s s | (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance - | There is no new planting and new operations for both estate and POM. Social impact assessment conducted on 04/03/2022 on 9 stakeholders base on questionnaire that provided to the stakeholders' base on 6 different categories. Other than that data collected from the stakeholders meeting, 12/05/2022, Workers empowerment meeting on 13/03/2022 and Gender committee meeting on 26/04/2022. Base on the stakeholders meeting, sighted one request for respond from Ibu Pejabat Polis Daerah Sri Manjung ask the management action plan for 2 commit suicide cases happen in 2021 and 2022. Further verification has been done by the auditor through interview with representative from IPD Seri Manjung, investigation department, confirmed that there is 2 commit suicide happen in UIE complex. As per Social and Environmental Impact Assessment (SEIA) based on consultation conducted with External Stakeholders dated on 4/3/2022 and Internal Stakeholders; Date: 30/4/2022 EIA latest review was conducted on 12/5/2022 based on feedbacks from internal and external stakeholders as well as environmental performance of UIE Estate & POM. For UIE Estate, environmental aspect and impact assessment covering all operational activities of Nursery, Replanting, Weeding, Pruning, Circle Sanitation, EFB Mulching, Water Management, Road, Paths, Railways, Boundary, P&D Management, Manuring, |

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| | | Harvesting, Mill Drain Connecting to Estate, Composting Pit and Linesite Water Discharge. For UIE POM, environmental aspect and impact assessment covering all operational activities of Sterilizer, Weighbridge/FFB Reception, Crane/Stripping Station, Kernel Station, Boiler House, Engine Room/Power House, Effluent Treatment Plant, Waste Management, Laboratory, Raw Water Treatment Plant, Workshop/Maintenance/Safety, Biogas Plant and Construction of Housing and other related facilities. | |
|----------|--|--|----------|
| 3.4.2 | For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. - Minor Compliance - | Management plan has been developed base on the outcome of the meeting conducted and documented in the same document with Social Impact assessment. The management take consideration on all issues raised and current action plan that has been established. Sample has been taken for the commit suicide issues happen in year 2021 and 2022 which the management has plan to allow workers for long leave and repatriation. Other than that, the management will highlight the communication and consultation training that the management is open to discuss any personal issues such as depressed, family and financial problem. Latest external stakeholder meeting was conducted on 12/5/2022 in UIE Estate Community Hall for both UIE Estate and UIE POM. | Complied |
| 3.4.3 | (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance - | The social and environmental management and monitoring plan is implemented, reviewed and updated regularly base on internal procedure. Latest revision of management plan is on 4/03/2022 | Complied |
| Criterio | on 3.5: A system for managing human resources is in place. | | |
| 3.5.1 | Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. | Standard operating procedures- Recruitment of local workers dated 31/03/2022. In the procedure has outline process of recruitment, promotion, retirement and termination for local workers. While for foreign workers, it has been documented in | Complied |

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| | - Minor Compliance - | Standard operating procedure – recruitment of guest workers dated 14/04/2022 revision 06. As per stated in the procedure, recruitment from other countries will be through recommendation by current foreign workers working in United Plantations Berhad, directly through agent and through representative in origin country. Sighted agreement between recruitment agent Trust Enterprise and 3 representatives from origin countries. | |
|----------|---|---|--------------------|
| 3.5.2 | Employment procedures are implemented, and records are maintained. - Minor Compliance - | Sample of 2 workers from estate that under Malaysia government recalibration program recruited in January 2021 and 2 local workers recruited for UIE POM. As per interview with the workers, it confirmed that recruitment process has been done according to the procedure. There is no retirement and termination for both estate and POM and one promotion from general clerk to chief clerk in April 2022. Sighted assessment and orientation done prior to the promotion. | Complied |
| Criterio | on 3.6: An occupational health and safety (H&S) plan is documented, effective | | |
| 3.6.1 | (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance - | United Plantation UIE Operating Units have conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The HIRARC was covered for all activities included motorized FFB cutter since 2018 and locomotive driver. | Non- compliance |
| | | Noise Risk assessment also conducted by management dated 13/7/2020. This report referred project ref. UPUIE2020-19.8, assessment by AEQ Safety Respond And Engineering Training & Consultancy PLT. From the result some area needed hearing protection such as EFB tractor driver, Tractor pool Fitter, Mill locomotive driver, harvester, and sundry general worker. The management needed to appoint Hearing Conservation | |
| | | Administrator and establish Hearing conservation program. Latest | |

| | | Audiometric test was on 18/2/2022. This conducted by Ansonex Resources Group. | |
|-------|---|--|----------|
| | | Another risk assessment was under Chemical Hazard Risk Assessment by CSK Murni Services Sdn Bhd. The report registration PK/04/04201 dated 8/7/2019 was available. The management conduct the additional CHRA for new chemical dated 10/4/2021 with CSK Murni Services Sdn Bhd and some amendment conducted on 25/4/2022 by Chemviro Enterprise (Report ref. HQ/13/ASS/00/316-2022/030. | |
| | | Sampling in PTW implementation, dated 7/1/2022 CPO storage tank cleaning. From verification found no health declaration as per Safe operating procedure for Confined space in the storage tank where Authorized Entrant must declare that he is fit to perform the job by filing in Health declaration form. As per record found Jothibasu, manikandar and Shorab health declaration was not available during audit. | |
| | | UIE POM establish Safe Operating Procedure (SOP UIED 053) for Confined space in the storage tank where Authorized Entrant must declare that he is fit to perform the job by filing in Health declaration form. However during verification found no record of health declaration for PTW implementation, dated 7/1/2022 CPO storage tank cleaning. These indicated the implementation of documented mitigation | |
| | | plans related to Permit To Work was insufficient. Hence a non-conformity has been raised. | |
| 3.6.2 | (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance - | Latest OSH Meeting was conducted on 21/3/2022 at UIE community hall and previously conducted in Dec 2021. From the meeting record the workplace inspection been conducted before OSH meeting and discuss during meeting. From the Safety | Complied |

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performance for Feb 2022 record there are 99.97 percent comply due to accident cases on 22/2/2022 refer JKKP 6 record 2/3/2022.

Workplace inspection dated 21/3/2022 was available in estate.

OSH appointment letter for HA (Mr Suresh) as per sampling was available dated 1/1/2021. This appointment letter valid from 1/1/2021 until 31/12/2022.

First aid box, there are 27 box in UIE estate. the record was available and recorded accordingly. The inspection was conducted monthly basis as per verified on site during site visit.

Latest Audiometric test was on 18/2/2022. This conducted by Ansonex Resources Group. Total workers attend this audiometric test was 58 employee, and from the result showed no possible hearing impairment within 58 employee.

Medical surveillance conducted yearly basis, the latest was on 20/1/2022 at Poliklinik Kana (HQ/12/DOC/00/297). Total 48 employee been send during this medical surveillance (43 person who is involve with chemical and 5 person involve with welding activity). From the result showed all fit to work to chemical included working with acephate.

JKKP 8 in UIE POM available, referred record JKKP8/65310/2021 dated 13/1/2022. There are 2 major accident happen pertaining to permanent disability with total mandays lost 125 days with LTA 11.83. Sampling 1 accident on 13/7/2021 at kernel plant. This accident happens during inspection and services of fibre cyclone airlock no.1. Total mandays lost was 109 days, from July until December 2021. The record was available in estate.

Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.

| 3.7.1 | (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training. - Critical (Major) compliance - | | programmes establishe Training Programme 2022 s including external stakeho | covering all | Complied |
|-------|---|--|--|-----------------|----------|
| 3.7.2 | Records of training are maintained. | Records of training maint | ained as per sample sighted | l as following: | Complied |
| | - Minor Compliance - | Training | Participant | Date | |
| | | Company sustainable policies | All employees estate & mill & external stakeholders | 15/1/2022 | |
| | | Trunk injection training | Relevant workers/operators, mandores and staff | 20/1/2022 | |
| | | First aid | First aiders | 14/4/2022 | |
| | | HCV/Riparian awareness | All employees estate & mill & external stakeholders | 12/5/2022 | |
| | | Field clinic – safety in chemical spillage/store/scheduled waste | Relevant workers/operators, mandores and staff | 17/5/2022 | |
| | | Chemical safety handling | Mill lab operators | 20/3/2022 | |
| | | Hearing conservation | Mill workers | 25/5/2022 | |
| 3.7.3 | Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor Compliance - | by Deputy Group Engine | Supply Chain was conducted er of UIE Engineering Dep Resident Engineer, Assist | artment. The | Complied |



| | | Weighbridge Supervisor, Weighbridge Operators and Estate Manager. | |
|-------|---|---|---------------------|
| | on 3.8: Supply chain requirement for mills All supply chain requirements are considered as Critical (C). However it will r | not contribute to suspension if there is more than 5 non-compliance w | vithin a principle) |
| 3.8.1 | Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/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 Mass Balance Module is applicable. | UIE Palm Oil Mill only receives certified FFB from own certified supply base. 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. | Complied |
| 3.8.2 | Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB. | Not applicable since UIE POM is certified as Identity Preserved SCCS module. | Not Applicable |
| 3.8.3 | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification 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 | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. Summary of CPO and PK deliver in a year (from the last audit date) reported under table C. | Complied |

| | produced shall then be recorded in each subsequent annual surveillance report. | | |
|-------|---|--|----------|
| 3.8.4 | The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform. | The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization, PalmTrace. The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows: - Palm trace Members ID: RSPO_PO1000000243 - License valid until 28/9/2022 - Member category: Oil Mill | Complied |
| 3.8.5 | Documented procedures The mill 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: a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) 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 mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. | RSPO Supply Chain Module D – CPO Mills: Identity Preserved dated 12/12/2019, Rev. 08 has been established to verify the volumes and sources of certified FFBs entering the mill, implementation of any processing controls and sales volumes of RSPO certified products. The procedure consisted of the following topics: - Procedures for handling of non-conforming palm oil products and/or documents - Grievances/ Complaints - Internal Audit - Record Keeping - Management Review - Sales and goods out All the procedures have implemented accordingly. The management appoint Mr N. Saravanaganes dated 1/4/2021 as officer in-charge overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. | Complied |

| 3.8.6 | Internal Audit i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports. | The latest internal audit was carried out s per MSPO & RSPO Internal Audit Report; United Engineering International Enterprises (UIE) Engineering Department (POM); Date: 19/4/2022. All the clauses in RSPO SCCS and RSPO Market Communications and Claims were covered during the audit. Latest UIE POM Sustainability Management Review for 2022; Minutes of Meeting; Date: 18/5/2022. No finding raised during the last internal audit with regards to RSPO SCCS. | Complied |
|-------|--|--|----------|
| 3.8.7 | Purchasing and Goods In i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. | When FFB delivered to the mill from the estate, the transporters presented FFB dispatch report to the mill weighbridge clerk in order the FFB to be received by the mill. E.g. of information available in the FFB dispatch report is as follows: - FFB despatch report no. (0000161238) - Estate's names (UIE estate, field 62) - Date & time of delivery (25/5/2022) - Field No. (62) - No. of cages (18 cages) - Cages information (166B/18, 223B/20, 190B/18, 275B/18, 056B/22, 200B/18, and etc.— 26 cages) - Weight (31.510 mt) | Complied |



3.8.8 | Sales and Goods Out

The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The 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):

- a) The name and address of the buver:
- b) The name and address of the seller;
- c) The loading or shipment / delivery date;
- d) The date on which the documents were issued;
- e) RSPO certificate number;
- f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);
- g) The quantity of the products delivered;
- h) Any related transport documentation;
- i) A unique identification number.

UIE POM ensured the required information is available in document form. Sampled of CPO contract: CPO(S/IP)147/2021 dated 1/6/2021, quantity 1000 mt (delivery month – May 2022)

- The name and address of the buyer; Unitata Berhad
- The name and address of the seller: The loading or shipment/delivery date; e.g. 25/5/2022
- 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); Crude Palm Oil (CPO) RSPO IP
- The quantity of the products delivered; e.g. 40880 kg
- Any related transport documentation; e.g. Despatch note e.g. #0000161187
- Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 693198
- A unique identification number: palm trace no. TR-b2ddb3e6-3d50
- Available in a few forms e.g. DN no., seal no., etc.

UIE POM ensured the required information is available in a few documented forms e.g. DN no., seal no., etc. Sampled of PK contract: UPKP202000011 dated 11/7/20, quantity 213 mt (delivery month – July 2020)

- The name and address of the buyer; XXX
- The name and address of the seller: UIE (M) Sdn Bhd
- The loading or shipment/ delivery date; e.g. 13/3/2019
- The date on which the documents were issued;

Complied

| | | A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Palm Kernel (PK) RSPO IP/SG The quantity of the products delivered; e.g. 31.38 mt Any related transport documentation; e.g. Despatch note e.g. #0000098049 Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 693198 A unique identification number: palm trace no. TR-d553abfd-711e | |
|-------|--|---|----------|
| 3.8.9 | Outsourcing Activities i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill 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 mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide | No CPO and PK process, bulking facilities outsourced by the mill. Transporter for PK was assigned by buyer. Outsourcing only applicable for CPO dispatch based on the delivered contract with buyers. No outsourcing for PK dispatch that have mill contracts with buyers. Sighted the CPO transporter contract agreement as following; - Agreement for Transport of Crude Palm Oil; Agreement date: 01/01/2022 between Uji Sakti Sdn Bhd (Transporter) and United Plantations Berhad (UPB) has been signed by both parties representatives. The agreement document has been included with terms and conditions as following: - UPB has legal ownership of transported CPO until it is delivered and received by buyer - UPB reserved the rights that certification body has access to transporter if an audit is deemed necessary - Transporter has acknowledged UPB outsource procedures through signing of the agreement which were explained by UPB prior to signing | Complied |

| | relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. | - Transporter to provide relevant access for duly accredited CBs to their respective operations, systems and all information upon announcement of audit in advance | |
|--------|--|--|----------|
| 3.8.10 | The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products. | Names and contact details of all contractors used for the physical handling of CSPO listed under stakeholder list 6/4/2022. | Complied |
| 3.8.11 | The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products. | No change of names and contract details of transporter for the physical handling of RSPO certified oil palm products. | Complied |
| 3.8.12 | i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: | RSPO Supply Chain Module D – CPO Mills: Identity Preserved dated 4/5/2022, Rev. 09 has been established which has included the record keeping requirements into the procedure. The mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these Sustainability Management System as below: i. Dispatch of CPO/PK delivery order ii. Daily Production Report iii. FFB Despatch Report from supplying estate iv. Training records v. FFB Transaction records | Complied |
| | a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three | The retention period of all the records were to keep for 3 years as stated in the procedure. iii) Records and balance of all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK monitored on a real-time basis on daily/monthly production figure. Real-time basis recorded in "Month End Production Report" for both CPO and PK. The data is summarized in "CPO/PK Mass Balance Calculation (Internal Process & Output for Financial Year XX/YY". Information available | |



| | (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock. | in the format is date, FFB processed, OER, CPO amount [opening, produced and closing] and transferred CPO [mill weight, refinery weight] | |
|--------|--|--|----------|
| 3.8.13 | Extraction Rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently. | The oil extraction rate (OER) and the kernel extraction rate (KER) is using the actual extraction rate. | Complied |
| 3.8.14 | Extraction rates shall be updated periodically 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. The average extraction rate is as per table 10 of this report. | Complied |
| 3.8.15 | Processing For Identity Preserved Module, the mill 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 products, including during transport and storage to strive for 100% separation. | UIE Palm Oil Mill only receives certified FFB from own certified supply base. 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. | Complied |
| 3.8.16 | Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform. | The actor is a palm oil mill and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. Based on the downloaded transactions register from the certification unit's PalmTrace, the company was able to demonstrate that it has been registering its transactions in the PalmTrace accordingly. Sampling on announcement under contract CPO(S/P) 147/2021 with total CSPO 765.3 mt. Transportation date was on 27/5/2022 and verified under transaction id TR-812e74c3-609c dated on 1/6/2022. | Complied |

| 3.8.17 | Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims. | United Plantations Berhad has obtained Trademark License from RSPO and seen the trademark license# 1-0004-04-100-00 which valid from 5/7/2020 – 4/7/2022 for IP Model. RSPO trademark was not use as POM producing raw product (CPO and PK). | Complied |
|--------|--|--|----------|
| Genera | l 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. | UIE POM does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records. | Complied |
| 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. | UIE POM does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records. | Complied |
| 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. | UIE POM does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records. | Complied |
| 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. | UIE POM does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records. | Complied |



| 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. | UIE POM does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records. | Complied |
|--------|---|---|----------------|
| Busine | ess 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. | Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. No claims have been made. | Complied |
| 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. | Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that the product is CPO with RSPO certificate number: RSPO 693198. | Complied |
| 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. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. | UIE Palm Oil Mill is not under distributor or wholesaler category. Thus, this requirement is not applicable. | Not Applicable |

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| 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. | No business to consumer communication on product specific claim made by UIE Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM. | Not Applicable |
|-----|--|--|----------------|
| 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. | No business to consumer communication on product specific claim made by UIE Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM. | Not Applicable |
| 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. | No business to consumer communication on product specific claim made by UIE Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM. | Not Applicable |
| 6.4 | Business to consumer communication shall not include information about the claimant's RSPO membership status. | No business to consumer communication on product specific claim made by UIE Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM. | Not Applicable |
| 6.5 | Members shall not communicate to consumers' information about their suppliers' RSPO membership status. | No business to consumer communication on product specific claim made by UIE Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM. | Not Applicable |
| 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. | No business to consumer communication on product specific claim made by UIE Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM. | Not Applicable |
| 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. | No business to consumer communication on product specific claim made by UIE Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM. | Not Applicable |
| 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 | No business to consumer communication on product specific claim made by UIE Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM. | Not Applicable |

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| | 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 . | | |
|----------|--|---|----------|
| MODUL | LE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES | | |
| Certifie | ed oil palm content (IP) | | |
| | For IP, 95% or above of the oil palm content must be RSPO IP-certified. | Oil palm content is 100% CPO and claim as RSPO IP-certified. | Complied |
| | For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP. | No SG claim made. | Complied |
| | 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. | Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified. | Complied |
| Labelli | ng and trademark (IP) | | |
| | Members are allowed to use the RSPO label in one of the following ways: RSPO trademark which includes the tag 'CERTIFIED' or 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 | As to date, no RSPO trademark used on the RSPO products. United Plantations Berhad has stated the member's history with regard to RSPO in the company's website and Annual Report 2019 with the trademark logo used. The trademark logo was used in accordance with the format. | Complied |



| | | , | |
|----------|---|---|----------|
| | 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. | | |
| Messag | ing (IP) | | |
| | Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements: The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org 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. | As to date, no RSPO trademark used on the RSPO products. United Plantations Berhad has stated the member's history with regard to RSPO in the company's website and Annual Report 2019 with the trademark logo used. The trademark logo was used in accordance with the format. | Complied |
| Princip | le 4: Respect community and human rights and deliver benefits | | |
| Criterio | on 4.1: The unit of Certification respects human rights, which includes respe | cting the rights of Human Rights Defenders. | |
| 4.1.1 | communicated to all levels of the workforce, operations, FFB suppliers | The management of UP Plantation Berhad has established internal policy for human right which has been established on 09/03/2020 and signed by Chief Executive Director. Stated in the policy that, the management of United Plantation Berhad is committed to | Complied |

| | unit of certification and contracted services, including contracted security forces Critical (Major) compliance - | adhere to the fundamental elements of International labour Organization. The management also commit that all employees, contractors, suppliers, trading partner and others adhered with the policy. Communication of the policy has been done through handbook title "Employee and stakeholder handbook" which has been established in 8 different languages. | |
|----------|--|--|------------------|
| 4.1.2 | The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance - | As per interview with workers, it has been confirmed that the management of UIE Estate and UIE POM did not instigate violence or use any form of harassment in their operations. | Complied |
| Criterio | on 4.2: There is a mutually agreed and documented system for dealing with | complaints and grievances, which is implemented and accepted by all | affected parties |
| 4.2.1 | (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance - | United Plantation Berhad has established internal policy title whistle blower policy which the objective to provide channel for stakeholders to raise concerns and reassurance that they will be protected from reprisal or victimization for whistleblowing. UP Downriver Business Unit implemented the company's documented Internal Grievance Redressal Procedure and External Grievance Redressal Procedure for grievance handling. Stated in the procedure that complaint received, 4 steps need to be followed which 1st step, 4 days, 2nd step and 3rd step is 7 days. | Complied |
| 4.2.2 | Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance - | In order to ensure that the procedure is understood including illiterate parties, the management has taken initiative to established handbook which explain the complaint procedure in 6 different languages. It has been confirmed that handbook has been given to all workers. Training for complaint procedure conducted for stakeholders on 12/05/2022 with attendance of 13 stakeholders. While for workers, it has been done on 02/02/2022 by Mr Shanthan to all workers. | Complied |



| 4.2.3 | The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance - | that records maintaine for house repair. San | Records of any complaint in form "Stakeholders logbook" Sighted that records maintained since 2021 which most of the complaint is for house repair. Sample has been taken for complaint dated 15/03/2022 and 24/04/2022 | | |
|----------|---|--|---|-------------------------|-------|
| 4.2.4 | The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance - | Internal Grievance Re Redressal Procedure for of access to independ conflict resolution med | Complied | | |
| Criterio | on 4.3: The unit of Certification contributes to local sustainable developmen | t as agreed by local cor | nmunities. | | |
| 4.3.1 | Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance - | to own workers for bot to all workers during | It has been verified that the management has provided contribution to own workers for both estate and POM. Chicken has been provided to all workers during the Eid Fitri and free housing, subsidize electricity and water. Other than that, free transportation to school has been provided. | | |
| Criterio | on 4.4: Use of the land for oil palm does not diminish the legal, customary of | or user rights of other u | sers without their free, | prior and informed cons | sent. |
| 4.4.1 | | | | Complied | |
| | history of land tenure and the actual legal or customary use of the land are available. | Tittle number | Land category | Hectarage | |
| | - Critical (Major) compliance - | PN 1065884 | Agriculture | 2,316 | |
| | | GM 2452 | Agriculture | 3.2451 | |
| | | GM 22197 | Agriculture | 6.6975 | |
| | | | | | |

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| | | All land title stated that it is for oil palm planting except one land title lot number 1188 (322.00 Ha) is for fruit farm/ orchard. UIE POM is located in the UIE estate area. | |
|--------|---|---|----------------|
| 4.4.2 | Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include: | Not applicable since there is no customary right land. | Not Applicable |
| 4.4.2a | Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance - | Not applicable since there is no customary right land. | Not Applicable |
| 4.4.2b | Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance - | Not applicable since there is no customary right land. | Not Applicable |
| 4.4.2c | Evidence that the legal, economic, environmental and social implications of 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 unit of certification's title, concession or lease on the land. - Minor compliance - | Not applicable since there is no customary right land. | Not Applicable |
| 4.4.3 | (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance - | Not applicable since there is no customary right land. | Not Applicable |

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| 4.4.4 | All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance - | Not applicable since there is no customary right land. | | | Not Applicable |
|-------|--|---|--|-----------|----------------|
| 4.4.5 | (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance - | Not applicable since there is no customary right land. | | | Not Applicable |
| 4.4.6 | There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance - | Not applicable since there is no customary right land. | | | Not Applicable |
| | on 4.5: No new plantings are established on local peoples' land where it call ealt with through a documented system that enables these and other stake | | | | |
| 4.5.1 | (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance - | List of land title maintained in the document title "Summary of land titles (As at 11/06/2021) with total 8 land title sighted. Sample as per below | | | Complied |
| | | Tittle number | Land category | Hectarage | |
| | | PN 1065884 | Agriculture | 2316 | |
| | | GM 2452 | Agriculture | 3.2451 | |
| | | GM 22197 | Agriculture | 6.6975 | |
| | | | nat it is for oil palm pla (322.00 Ha) is for fru UIE estate area. | | |

| 4.5.2 | (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance - | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. | Not Applicable |
|-------|--|--|----------------|
| 4.5.3 | Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance - | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. | Not Applicable |
| 4.5.4 | To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance - | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. | Not Applicable |
| 4.5.5 | Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance - | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. | Not Applicable |

| 4.5.6 | Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance - | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. | Not Applicable |
|-------|--|---|------------------|
| 4.5.7 | New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance - | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. | Not Applicable |
| 4.5.8 | (C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance - | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. | Not Applicable |
| | on 4.6: Any negotiations Concerning compensation for loss of legal, customar, local communities and other stakeholders to express their views through the | | ables indigenous |
| 4.6.1 | (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance - | United Plantations Berhad has developed Grievances Redressal Procedures for Land Dispute as displayed in the company's website. The procedure has separated into three phases. Phase 1 is regarding on the lodging of complaints by the local communities on the dispute with supporting documents to be submitted. Phase 2 is involving the land dispute team, GIS team and complainant to measure and checking the location of the disputed land. If the claim is valid, then the negotiation process takes place to decide whether to compensate via payment or other methods of compensation. If mutual agreement is not achieved, then the complaint will be | Complied |
| | | passed to court to make final decision. | |



| | monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance - | R00 dated 1 January 2016. The SOP explains the standard of compensation calculation which also gives the compensated person a bargaining/negotiation position. However, there is no record of any. | |
|-------|---|--|------------------|
| 4.6.3 | Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance - | No scheme small holdings within UP UIE certification unit. Hence, this requirement is not applicable. | Not Applicable |
| 4.6.4 | The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance - | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. | Complied |
| | on 4.7: Where it can be demonstrated that local peoples have legal, cushment of rights, subject to their FPIC and negotiated agreements. | stomary or user rights, they are compensated for any agreed land | acquisitions and |
| 4.7.1 | (C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance - | Procedure for calculating and distributing fair compensation has been established under SOP for land compensation No. HRD-015-R00 dated 1 January 2016. The SOP explains the standard of compensation calculation which also gives the compensated person a bargaining/negotiation position. However, there is no record of any compensation paid to any legal, customary or user rights holder. | Complied |
| 4.7.2 | (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance - | Procedure for calculating and distributing fair compensation has been established under SOP for land compensation No. HRD-015-R00 dated 1 January 2016. The SOP explains the standard of compensation calculation which also gives the compensated person a bargaining/negotiation position. However, there is no record of any compensation paid to any legal, customary or user rights holder. | Complied |

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| 4.7.3 | Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that communities have lost access and rights to land for plantation | Complied |
| | - Minor compliance - | expansion. | |
| Criterio rights. | on 4.8: The right to use the land is demonstrated and is not legitimately con | ntested by local people who can demonstrate that they have legal, cu | stomary, or user |
| 4.8.1 | Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance - | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. Neither has there been any dispute. | Not Applicable |
| 4.8.2 | (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance - | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. Neither has there been any dispute. | Not Applicable |
| 4.8.3 | Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance - | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. Neither has there been any dispute. | Complied |
| 4.8.4 | For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights | Complied |

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| | - Minor compliance - | of other users without their free, prior and informed consent. Neither has there been any dispute. | |
|---|--|---|----------------|
| Princip | le 5: Support smallholder inclusion | | |
| Criterio | on 5.1: The unit of certification deals fairly and transparently with all smallh | nolders (Independent and Scheme) and other local businesses. | |
| accessible by smallholders. which is valid until 28 September 2022. The | | UIE is an Identity Preserved Mill via RSPO certificate No. 693198 which is valid until 28 September 2022. Therefore, it processes only FFB from its own estates and does not receive crops from smallholders. | Not Applicable |
| 5.1.2 | (C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).- Critical (Major) compliance - | UIE is an Identity Preserved Mill via RSPO certificate No. 693198 which is valid until 28 September 2022. Therefore, it processes only FFB from its own estates and does not receive crops from smallholders. | Not Applicable |
| 5.1.3 | (C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance - | UIE is an Identity Preserved Mill via RSPO certificate No. 693198 which is valid until 28 September 2022. Therefore, it processes only FFB from its own estates and does not receive crops from smallholders. | Not Applicable |
| 5.1.4 | (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance - | UIE is an Identity Preserved Mill via RSPO certificate No. 693198 which is valid until 28 September 2022. Therefore, it processes only FFB from its own estates and does not receive crops from smallholders. | Not Applicable |
| 5.1.5 | Contracts are fair, legal and transparent and have an agreed timeframe Minor compliance - | Contracts sighted were between UIE Mill and CPO transporter, Uji Sakti Sdn Bhd and as per verification the contract between Uji Sakti Enterprise and UP UIE was available dated 1/1/2022. This contract was valid from 1/1/2022 until 31/12/2022. | Complied |

| | | estate. As per verif Enterprise and UP UIE 15009, 15010 and 15 until 31/12/2022. | ication the contract was available dated 1/011. This contract wa | rise for harvesting in between Ten Crown 1/2022 as per MOA no s valid from 1/1/2022 erms contained therein ed timeframe. | |
|-------|---|---|---|---|----------|
| 5.1.6 | (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance - | orders, invoices, and documents are signed payment advice dated Enterprise and paid | I contracts for the I by both vendor and UI I 10/11/2021 No BPV on 12/11/2021 (Chec ertification unit is able | n the form of purchase arger transaction. All E estate. Based on the 03/11 for Ten Crown ue Payment Voucher to demonstrate that | Complied |
| 5.1.7 | Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance - | Records of weighing equipment stamping was maintained on annual basis at visited operating units even though there is no smallholder within UIE certification unit. Summary of stamping records as follows: | | | Complied |
| | | Weighing equipment | Model/capacity | Date of stamping Certificate no. | |
| | | Serial no: 20201008107 | MPK (E), Avery E1110, 40,000kg | 21/5/2022 | |
| | | Serial no: B610190078 | M.Toledo IND246, 40,000kg | 21/5/2022 | |
| | | Serial no: B610190087 | M.Toledo IND246, 80,000kg | 21/5/2022 | |

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| 5.1.8 | The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance - | No independent smallholder at UIE Business Unit. | Complied |
|----------|---|--|----------------|
| 5.1.9 | (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance - | The existing grievance mechanism which exists under Grievance Redressal Procedure is open to all stakeholders including statutory bodies, local communities, smallholders and NGOs. The procedure states that grievances from external stakeholders | Complied |
| | | are received by estate manager/head of department/company secretary and will be dealt with in accordance with the process stipulated in the procedure itself. | |
| Criterio | on 5.2: The unit of certification supports improved livelihoods of smallholde | rs and their inclusion in sustainable palm oil value chains. | |
| 5.2.1 | The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance - | | Not Applicable |
| 5.2.2 | The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance - | which is valid until 28 September 2022. Therefore, it processes only FFB from its own estates and does not receive crops from | Not Applicable |
| 5.2.3 | Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. | UIE is an Identity Preserved Mill via RSPO certificate No. 693198 which is valid until 28 September 2022. Therefore, it processes only FFB from its own estates and does not receive crops from | Not Applicable |

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| | - Minor compliance - | smallholders. Due to Covid 19 issue no training been conducted past 2 years. | |
|---------|---|--|----------------|
| 5.2.4 | (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance - | UIE is an Identity Preserved Mill via RSPO certificate No. 693198 which is valid until 28 September 2022. Therefore, it processes only FFB from its own estates and does not receive crops from smallholders. Due to Covid 19 issue no training been conducted past 2 years. | Not Applicable |
| 5.2.5 | The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance - | UIE is an Identity Preserved Mill via RSPO certificate No. 693198 which is valid until 28 September 2022. Therefore, it processes only FFB from its own estates and does not receive crops from smallholders. Due to Covid 19 issue no training been conducted past 2 years. | Not Applicable |
| Princip | ole 6: Respect workers' rights and conditions | | |
| Criteri | on 6.1: Any form of discrimination is prohibited. | | |
| 6.1.1 | (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance - | Non-discrimination policy has been established and documented in the document title Gender Policy dated 24/04/2015. Stated in the policy that the management is committed to maintain a workplace free from harassment on any kind of harassment base on employee's race, colour, religion, gender, national origin and sexual orientations. Communication of the policy has been done through handbook title "Employee and stakeholder handbook" which has been established in 8 different languages. | Complied |
| 6.1.2 | (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance - | Sample of 2 workers from estate that under Malaysia government recalibration program recruited in January 2021 and 2 local workers recruited for UIE POM. As per interview with the workers, it confirmed that recruitment process has been done according to the | Complied |



| | | recruitment fee charge has been done during the interview at origin countries and when workers arrived at the estate/POM. | |
|-------|--|---|----------|
| 6.1.3 | The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance - | Sample of 2 workers from estate that under Malaysia government recalibration program recruited in January 2021 and 2 local workers recruited for UIE POM. As per interview with the workers, it confirmed that recruitment process has been done according to the procedure. It also has been confirmed that recruitment process done base on skills and capabilities. | Complied |
| 6.1.4 | Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance - | | Complied |
| 6.1.5 | (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance - | | Complied |
| 6.1.6 | There is evidence of equal pay for the same work scope Minor compliance - | Sample of workers' pay slips has been taken by the auditor and there is evidence that each workers has been paid equal pay nevertheless gender, race, gender and religion. UIE Estate is located in district of Teluk Intan and previous minimum wages for daily rated workers is RM46.15. Effective from May 2022, minimum daily rated wages are RM1,500/month or RM57.69/day. | Complied |

Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).

| 6.2.1 | (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance - | Latest collective agreement with MAPA/NUPW for year 2022 sighted in 2 different document which are "MAPA/NUPW Field and other general employers and fringe benefits agreement" and "MAPA/NUPW agreement on the wages of harvesters, harvesting kanganies, loaders and other loaders on oil palm estates, 2020". Collective agreement is come into force on 01/01/2022 and valid for 3 years. For POM, collective agreement sighted in the document MAPA/NUPW Palm Oil Mill, employees` agreement, 2019 signed 29/03/2019. Other than that, the management estate and POM refer to Employment Act 1955 and Minimum Wages Order 2022. | Complied |
|-------|--|---|----------|
| 6.2.2 | (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members. - Critical (Major) compliance - | employment available to the workers for sample employees sighted Regular working hours, deductions, overtime, sick leave, holiday | Complied |
| 6.2.3 | (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. - Critical (Major) compliance - | · · · | Complied |

| | | Sample of workers taken for UIE POM a. 409663 b. 400899 c. 416027 d. 416089 e. 416223 | |
|-------|--|---|-----|
| 6.2.4 | (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure. - Critical (Major) compliance - | There are 3 types of housing quarters in UIE complex which occupied by workers from UIE POM and Estate. Each local workers with families are allocated one house with 3 rooms while for foreign workers shared a house with either 3 or 4 workers per house. Verification with sample local and foreign workers confirmed that the number of houses provided by company are sufficient for all workers. Workers too confirmed that immediate action taken by management in case of any housing repair requests, depend on damage conditions and availability of materials. Directive from head of Group Manager Human Resources, Sustainability and Safety sighted dated 27/07/2018 stated that inspections on all areas within the mill/estate concession are to be carried out in weekly basis and to be verified by Manager/Head of Department. Line site inspection records done by hospital assistant for February 2022 on weekly basis and reported in the "Line site inspection logbook" There is no school and kindergarten in the complex, but the management provided transportation to school. Nearest school is located at Pantai Remis which are Sekolah Kebangsaan 40 rantai, SJK (C) Sungai Batu, SJK (T) Ladang Sogamana and also located in Ayer Tawar. | OFI |

| | | Electric and water supply provided by the government through Lembaga Air Perak (LAP) and Tenaga Nasional Berhad (TNB). Subsidized water given at 15 gallon per day while for electricity, RM6.54/month/ person. However, it can be further improved to include details of electric subsidy in the employment contract. Hence, an OFI has been raised on the matter. | |
|-------|---|--|----------|
| 6.2.5 | The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance - | The nearest town for UIE POM and UIE Estate are Ayer Tawar town and Pantai Remis Town distances 15km. The management also appointed 2 grocery store located at the line site. Monitoring on grocery pricing sighted and done on monthly basis. As per interview with workers, confirm that price is affordable and sufficient. 3 canteen also available that provide cook food. | Complied |
| 6.2.6 | A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate). Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks. | Plantation Industry. UP Downriver Business Unit has conducted a Prevailing Wage Assessment in A Collaboration with Monash University, Sime Darby Berhad & IOI Berhad based on RSPO Guidance On Calculating Prevailing Wages. The assessment also referred to the Benchmark Living Wage (Based on Monash University's Study) and Benchmark Living Wage in Source Country (Bangladesh, India and Indonesia). As a summary, prevailing wages for local workers were within RM1,700 to RM1,800 while for guest workers were within RM1,700 to RM2,200. | Complied |



| | In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations. | | |
|-------|--|---|----------|
| | For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country). | | |
| | Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including: | | |
| | Updated assessment on prevailing wages and in-kind benefits | | |
| | There is annual progress on the implementation of living wages | | |
| | Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment | | |
| | The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. | | |
| | - Minor compliance - | | |
| 6.2.7 | Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal. - Minor compliance - | It has been verified that there is no casual and temporary workers has been recruited in UIE POM and UIE Estate including by contractors. UIE Estate engaged Ten Crown Enterprise as contractor in harvesting of few matured oil palm fields in UIE estate as per | Complied |
| | Timor compilation | verified contract between Ten Crown Enterprise and UP UIE | |

| - | | | |
|---------|--|--|----------|
| | | available dated 1/1/2022; MOA no 15009, 15010 and 15011. This contract was valid from 1/1/2022 until 31/12/2022. | |
| | | All contractor's workers are fulltime employee among both locals and foreigners with valid work permits. All contractor's workers are paid equally without discrimination when comparing to the fulltime workers directly employed by UIE. | |
| freedom | n 6.3: The unit of Certification respects the rights of all personnel to form of association and collective bargaining are restricted under law, the employersonnel. | | |
| 6.3.1 | (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented. | United Plantations Berhad has established Human Rights Policy dated 9/3/2020 signed by Chief Executive Director which stated that the management respect the right of personnel to form, join and participate in registered trade unions and to bargains collectively. | Complied |
| | - Critical (Major) compliance - | Communication of the policy to stakeholder conducted on 12/05/2022 with attendance of stakeholders from different category. | |
| | | Communication of the policy has been done through handbook title "Employee and stakeholder handbook" which has been established in 8 different languages. | |
| 6.3.2 | Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request. - Minor compliance - | Since there is no membership for trade union in both UIE Estate and UIE POM, the management has taken alternative to established workers welfare committee. Latest meeting conducted on 20/03/2022 with attendance representative from different origin. There are no significant issues has been discussed. | Complied |
| 6.3.3 | Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. | The management has done assessment to collect information and agreement from workers for the appointment of workers representative base on origin. There is evidence that all workers agreed with appointment done. It also has been confirm through | Complied |

| | - Minor compliance - | interview with the workers itself. Sample of workers representative appointed on 01/01/2022 | |
|----------|--|--|----------|
| | | a. Gajendra, Indian | |
| | | b. Ramli, Indonesian | |
| | | c. Alamgir, Bangladesh | |
| Criterio | on 6.4: Children are not employed or exploited. | | |
| 6.4.1 | A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance - | United Plantations Berhad has established Human Rights Policy dated 9/3/2020 signed by Chief Executive Director which stated that the management will not tolerate the use of child or forced labour, slavery or human trafficking in any plantation and facilities. The definition of child labour as United Nations Convention on the of the child which is less than 18 years old | Complied |
| 6.4.2 | (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance - | Base on sample of workers and interview, it has been verified that workers meet the minimum requirement where there is no young and children workers has been recruited. | Complied |
| 6.4.3 | (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work Critical (Major) compliance - | Base on sample of workers and interview, it has been verified that workers meet the minimum requirement where there is no young and children workers has been recruited. | Complied |
| 6.4.4 | The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance - | Communication of the policy to stakeholder conducted on 12/05/2022 with attendance of stakeholders from different category. Communication of the policy has been done through handbook title "Employee and stakeholder handbook" which has been established in 8 different languages. | Complied |

| 6.5.1 | (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance - | United Plantations Berhad has established Human Rights Policy dated 9/3/2020 signed by Chief Executive Director where they committed to the protection and advancement of human rights including prohibiting violence and sexual harassment among all employees. Communication of the policy to stakeholder conducted on 12/05/2022 with attendance of stakeholders from different category. Communication of the policy has been done through handbook title "Employee and stakeholder handbook" which has been established in 8 different languages. | Complied |
|-------|---|--|----------|
| 6.5.2 | (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance - | United Plantations Berhad has established Gender Policy dated 25/4/2015 signed by Chief Executive Director where they committed to protect the reproductive rights of all employees, especially of women. Communication of the policy to stakeholder conducted on 12/05/2022 with attendance of stakeholders from different category. | Complied |
| 6.5.3 | Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance - | For UIE Estate, the management has identified 1 new mother and | Complied |
| 6.5.4 | A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance - | United Plantation Berhad has established internal policy title whistle blower policy which the objective to provide channel for stakeholders to raise concerns and reassurance that they will be protected from reprisal or victimization for whistleblowing. | Complied |

| | | UP Downriver Business Unit implemented the company's documented Internal Grievance Redressal Procedure and External Grievance Redressal Procedure for grievance handling. Stated in the procedure that complaint received, 4 steps need to be followed which 1st step, 4 days, 2nd step and 3rd step is 7 days. Other than that, the management established specific procedure for any complaint related to sexual harassment which sighted in the document "Grievance and redressal procedure for sexual harassment in the workplace" and investigation need to be initiated by head of department. | |
|----------|---|---|----------|
| Criterio | on 6.6: No forms of forced or trafficked labour are used. | | |
| 6.6.1 | (C) All workers have entered into employment voluntarily and the following are prohibited: Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees. Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty for termination of employment Debt bondage Withholding of wages Critical (Major) compliance - | Employment contracts detailing payments and conditions of employment available to the workers for sample employees sighted as per indicator 6.1.6 above. Each employment contracts were agreed and signed by both employee and employer which confirmed that all work is voluntary and force labour are prohibited. On-site consultation with few sample foreign workers confirmed that there is no retention of passport by company and they were provided with lockers for safe keeping of their passports. | Complied |
| 6.6.2 | (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented. - Critical (Major) compliance - | United Plantations Berhad has established internal policy for migrant workers established in the document title "United Plantations Berhad, Guest Workers policy" dated 17/08/2020. As stated in the policy, that there is no forms of forced labour or trafficked labour | Complied |

| | | used, all living quarters is compliance with the workers minimum standard of housing and amenities act 1990. | |
|----------|--|--|----------|
| Criterio | on 6.7: The unit of certification ensures that the working environment under | er its control is safe and without undue risk to health. | |
| 6.7.1 | (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded. - Critical (Major) compliance - | OSH Meeting latest conducted on 21/3/2022 at UIE community hall and previously conducted on Dec 2021. From the meeting record the workplace inspection been conducted before OSH meeting and discuss during meeting. From the Safety performance for Feb 2022 record there are 99.97 percent comply due to accident cases on 22/2/2022 refer JKKP 6 record 2/3/2022. Workplace inspection dated 21/3/2022 was available in estate. OSH appointment letter for HA (Mr Suresh) as per sampling was available dated 1/1/2021. This appointment letter valid from 1/1/2021 until 31/12/2022. | Complied |

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Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.

- Minor compliance -

Emergency Response Plan Flow Charts were available to address emergencies such as Accident and Dangerous Occurrence, Physical Injury, Chemical Spillage, Vehicle Accident, Fire Outbreak, Major Spillage, Chemical Poisoning & Prevention of Covid-19 Infection in UIE.

Training on First Aid been conducted on 14/4/2022 and previously was on 23/2/2021. Attended by 33 person included Safety officer and trainer by Hospital assistant (Mr Suresh).

Emergency Response Training conducted yearly basis, and latest record was on 18/5/2022 (Trainer: En Hanafi (Pantai Remis BOMBA)) attended by 40 employee.

Trunk injection training conducted on 20/1/2022 at F116 attended by 4 employee.

Chemical spraying Training using Maxi Boom as per record Air Blaster Training and safety conducted on 7/3/2022

JKKP 8 (JKKP 8/94880/2021) record was available dated 06/1/2022. There are 3 accident happen from the previous JKKP 6 report with LTA record 3.48. The record of JKKP 6 also available as per verification record as per detail below:-

| Occupational type | Date accident | JKKP 6 send |
|-------------------|---------------|-------------|
| Harvester | 22/3/2021 | 26/3/2021 |
| Harvester | 17/4/2021 | 22/4/2021 |
| Harvester | 5/7/2021 | 7/7/2021 |

Complied



| 6.7.3 | (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine | for Trunk Injection record as per below:- | | | | | | Complied |
|-------|--|--|-----------------|-----------------|-------------|--------------|----------------------------|----------|
| | operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. | Name | Welington shoes | Rubber glove | 3m Mask | Apron | | |
| | - Critical (Major) compliance - | Balkil | 21/1/22 | 4/5/22 | 4/5/22 | 21/1/22 | | |
| | | Barun | 11/5/22 | 11/5/22 | 17/1/22 | 17/1/22 | | |
| | | Moinudin | 12/11/21 | 6/5/2022 | 6/5/22 | 6/5/22 | | |
| 6.7.4 | All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law. - Minor compliance - | | | | | | ry nd to ne ed | Complied |
| | | Operating (| unit Month | То | tal workers | contribution | | |
| | | | ate April 20 |)22 47 | 3 | RM 13,133.2 | | |
| | | and UIE Mi | Jan 20 | 22 48 | 6 | RM 12,811.8 | | |
| 6.7.5 | Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance - | Lost Time Accident (LTA) metrics at UIE POM and Supply Base estates were recorded accordingly with periodical annual submission made to DOSH on JKKP 8. Based on 2021 data, the record of LTA for UIE estate was 3.48 and for UIE Mill was 2.15. | | | | | ıal | Complied |



| Criteri | on 7.1: Pests, diseases, weeds and invasive introduced species are effective | ely managed using appropriate Integrated Pest Management (IPM) tech | niques. |
|---------|---|---|----------|
| 7.1.1 | (C) IPM plans are implemented and monitored to ensure effective pest control.- Critical (Major) compliance - | IPM is documented in United Plantation SOP no.7 OP Pest Management. The estates continued to implement biological control for the oil palm pest such as leaf eating pest and rat. IPM techniques applied at the estates includes: | Complied |
| | | - Beneficial Flowering Plants | |
| | | - Natural Control Agents | |
| | | - Monitoring of pest numbers and the use of triggers for initiation of control measures. | |
| | | - Introduction of barn owls Tyto Alba for biological control of rats. Barn owl boxes are constructed at the rate of 1 box for every 15 ha. | |
| | | - Planting of beneficial plants Cassia Cobanensis, Antigonon Leptopus and Tunera subulata at ratio of 60:20:20 along roadsides to attract natural predators | |
| | | As per 5-Step Integrated Pest Management Programme approach taken to contain and control bagworm outbreak thus limiting monocrotophos usage: | |
| | | - Integrated Pest Management | |
| | | - Ongoing Monitoring | |
| | | - Aerial Surveillance | |
| | | - Use of biological control agents | |
| | | - Final resort | |
| | | Although census records showed that there was no outbreak of leaf eating pest nonetheless beneficial plants are being planted and seen thrive in the field visited. Barn owl occupancy census was conducted as per UPB SOP census interval once every 3 months. Reported occupancy rate is close to 10.35% as per March 2022. | |



| 7.1.2 | Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance - | None of those species referenced in the Global Invasive Species Database and CABI.org were present in the filed visited or reported by UIE Estate. | Complied |
|----------|---|--|----------|
| 7.1.3 | There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance - | | Complied |
| Criterio | n 7.2: Pesticides are used in ways that do not endanger health of workers | , families, communities or the environment. | |
| 7.2.1 | (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance - | Written justification of all pesticides used is documented in Field Manual (Safe Use of Pesticide) S4-S4.2. Selected products are specific to the target pest, weed and disease. Sighting of records showed the following practice is evident: - 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 |
| 7.2.2 | (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - Critical (Major) compliance - | UIE Estate maintained and kept records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications). Its usage rate was 2.968 a.i/planted ha, a deviation of 24.6% from previous year. | Complied |

| 7.2.3 | (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans Critical (Major) compliance - | United Plantation guide the estate: In addition to poor other initiatives Crop and Unite pesticides that the effective and so implementation planted cassia concarambola sp. Till | Complied | | | |
|-------|---|--|-----------------------------|-----------------------|---------------|--|
| | | cassia cobanensis | tunera subulate 18996 | antigonan leptosus | Carambola sp. | |
| | | The other sampl was done on Ma rate for BOB was | | | | |
| 7.2.4 | There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance - | No prophylactic records verificati fertilizer reduction | Complied | | | |
| 7.2.5 | 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, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used | UIE Estate has a and pesticides of Occupational Safe Paraquat is total through intervies alternatives agriculture alternative alternative alternative alternative alternative alternative alternative alternative alternative | Complied | | | |

| | c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. - Minor compliance - | | |
|-------|--|---|----------|
| 7.2.6 | (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out. - Critical (Major) compliance - | | Complied |
| 7.2.7 | (C) Storage of all pesticides is in accordance with recognised best practices. - Critical (Major) compliance - | The operating units comply with Occupational Safety and Health (CLASS) Regulation 2013 and Regulation 9 of the Pesticides Act 1974. During visit it was noted that: Record of the purchase, storage and use had been properly maintained. All stores were secured under lock and key with restricted access. Only authorized personnel was allowed to handle the chemicals. | Complied |

| 7.2.8 | All pesticide containers are triple rinsed and punctured before being | All the chemicals were stored and segregated accordingly by class. Store keeper was trained in the handling all pesticides. Provision of ventilation fan and lighting. Secondary containment tray placed underneath containers to contain leaks, if any. All precautionary measures such as the need to use required PPE, Chemical Safety Hazard pictograms and SOP to enter the store were posted at entrance to store. Chemical SDS in English language and Bahasa Malaysia and environmental spill kit were kept handy inside the store. Concrete cemented floor, bund wall and provision of sump pond | Complied |
|-------|--|---|----------|
| 7.2.0 | disposed of and/or handled responsibly if used for other purposes. - Minor compliance - | Empty pesticides containers had been triple rinsed, holes punched in them and stored separately as recycle waste. The management of the empty chemical containers is guided by Standard Operating Procedure "(C) Triple Rinsing Empty Pesticide Containers", dated 26/5/2016. It is considered as non-Scheduled Waste. Nonetheless, the estate still disposed through SW method due to difficulty to find collector. Verified the records of Scheduled Waste Disposal Consignment # 20210311130J7VU5; Waste code: SW410; Date: 11/3/2021; Transporter/Receiver: Edsha Solutions Sdn. Bhd.; Quantity: 0.47 mt. | Complied |
| 7.2.9 | (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance - | Aerial spraying is strictly prohibited by United Plantation and no evidence of its use was sighted during field visit. | Complied |

| 7.2.10 | (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance - | Medical surveillance conducted yearly basis, the latest was on 20/1/2022 at Poliklinik Kana (HQ/12/DOC/00/297). Total 48 employee been send during this medical surveillance (43 person who is involve with chemical and 5 person involve with welding activity). From the result showed all fit to work to chemical included working with acephate. | | | | | Complied |
|----------|---|--|-------------------------------|-----------------|-------------------|---|-------------------------------|
| 7.2.11 | (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance - | | | | | | Complied |
| Criterio | n 7.3: Waste is reduced, recycled, reused and disposed of in an environment | entally and so | cially respo | onsible manner. | | | |
| 7.3.1 | | | | | | | Complied |
| | | Types of waste | Source | Disposal method | Waste managers | Action to reduce | |
| | | containers empty drums reused for premix Solution Sdn. Bhd. Sold to waste manager Fertilizer bags Fertilizer empty bags Reuse for loose fruit collection Reused as weirs bag for water management Fertilizer packaging wil monitored | containers empty | empty | reused for | Solution | Increase area for lawn mowing |
| | | | Implementation of IPM program | | | | |
| | | | empty | | | EFB from the mill for mulching to reduce inorganic fertilizers | |
| | | | | bag for water | | packaging will be monitored to encourage 50 kg | |



| Old wooden sleepers | Field | Reused as shoring for underpasses and turning point & boundary fencing | | Converting all wooden sleepers to metal sleepers to reduce dependency on tropical timbers | |
|--|------------------|---|--|---|--|
| Hospital syringes, swabs and sharps | UIE Clinic | Despatched to waste manager – Edgenta | Edgenta Mediserve Sdn. Bhd Kamunting | . Performance by | |
| Domestic waste | Household | Segregated items such as plastic, metal, glass, paper are dispatch to was managers | Ceka Gemilang, Sri Subra Enterprise & Pragasl Rao Enterprise | recyclable wastes | |
| | | Landfill organic waste | | | |
| UIE POM m | | rated industrial w | astes wh | ich were managed | |
| Types of waste | Source | Disposal method | | Action to reduce environmental impact | |
| POME | Effluent pond | Discharge through application in UIE E palm fields | state oil | Discharged water sample analysis to comply DOE license | |
| Boiler ash | Boiler | Disposed to de dumping site near pond. | signated holding | Daily levelling by machine | |



| | | EFB Scheduled Waste | Process Milling | Land application in UIE Estate oil palm fields Disposal through authorized SW collector | Zero burning Managed as per legal requirements | | |
|----------|---|--|--|--|---|----------|--|
| 7.3.2 | Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance - | described in wastes (see included in Site visit co | Procedure under United Plantation File 13, Waste Management described in flowchart is available. Disposal method of all identified wastes (see column 2 in table in above indicator 7.3.1) were included in the pollution prevention plan for UIE Mill and Estate. Site visit confirmed that the practice to reduce, reuse and recycle of waste materials has been implemented throughout the company. | | | | |
| 7.3.3 | The unit of certification does not use open fire for waste disposal. - Minor compliance - | The unit of and none vand visit to | Complied | | | | |
| Criterio | on 7.4: Practices maintain soil fertility at, or where possible improve soil fer | tility to, a lev | el that en | sures optimal and sustain | ed yield. | | |
| 7.4.1 | Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance - | | | | | | |
| 7.4.2 | Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance - | Research E following: - Result of - Leaf An Commer | Departmer f Soil Anal alysis; Re cial Field | oil sampling is carried out nt (UPRD) as per latest ysis; Source: UIE Estate; l ef. # 0.218(c)/696/2022 Foliar Samples; Lab Tes 1021; Date Analysed: 3-28 | Lab Test # E004/19; ; Date: 21/4/2022; st # A034/21; Date | Complied | |

| 7.4.3 | A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance - | A nutrient recycling strategy is in place as per Guidelines for Mulching with EFB or Shredded Palm Chips: - Immature Areas: 120-150 kg/palm for 1st year planting - Immature Areas: 250 kg/palm for 2nd year planting - Mature Areas: 50 mt/ha every alternate avenue | Complied |
|----------|--|---|----------|
| 7.4.4 | Records of fertiliser inputs are maintained Minor compliance - | Records of fertilizer inputs are maintained as per following: - Year 2022 Fertilizer Recommendations for UIE (M) Bhd (Rates in Kg per Palm). Sighted for Mature Areas Est. 2A; Field # 69; Year Planted: 2016; Soil type: Sedu; Area: 61.99 ha; Palm/Ha: 148; Actual Total Palm: 9156; Samples sighted for fertilizers applied in Feb/Mar 2022: 1) Urea: 0.6 kg/palm; Total: 5.49 mt 2) MOP: 1.4 kg/palm; Total: 12.82 mt 3) Borate (B48): 0.1 kg/palm; Total: 0.916 mt - Year 2021 Fertilizer Recommendations for UIE (M) Bhd (Rates in Kg per Palm). Sighted for Mature Areas Est. 2A; Field # 69; Year Planted: 2016; Soil type: Sedu; Area: 61.99 ha; Palm/Ha: 148; Actual Total Palm: 9175; Samples sighted for fertilizers applied in Feb/Mar 2021: 1) Urea: 0.9 kg/palm; Total: 8.26 mt 2) MOP: 1.4 kg/palm; Total: 12.85 mt 3) Borate (B48): 0.1 kg/palm; Total: 0.918 mt | Complied |
| Criterio | on 7.5: Practices minimise and control erosion and degradation of soils. | | |
| 7.5.1 | (C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance - | Maps identifying marginal and fragile soils, including steep terrain, are available as per United Plantations Berhad UIE Estates Soil Map Estate 1 & Estate 2. Types of soil as following: - Sedu Series | Complied |

| | | - Rudua Series - Segari Series | |
|--------------------------|--|--|------------------|
| | | - Rengam Series | |
| | | - Briah Series | |
| | | - Lunas Series | |
| | | - Penor Series (Shallow Peat <3') | |
| | | - Cherang Hangus Series | |
| | | - Erong Series (Moderately Deep Peat 3' – 6') | |
| | | - Gondang Series (Deep Peat > 6') | |
| | | - Sogomana Series | |
| 7.5.2 | No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance - | Generally, the topography of UIE Estate (Division 1 and 2) were flat to undulating. No steep terrain greater than 25 degrees or larger than 25 Ha within UIE Estate. | Complied |
| 7.5.3 | There is no new planting of oil palm on steep terrain Minor compliance - | Neither new planting nor steep terrain presence within UIE Estate. | Complied |
| Criterio operatio | on 7.6: Soil surveys and topographic information are used for site planning ons. | in the establishment of new plantings, and the results are incorporate | d into plans and |
| 7.6.1 | (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, | As per United Plantations Berhad UIE Estates Soil Map Estate 1 & Estate 2. Types of soil as following: | Complied |
| | including steep terrain, are taken into account in plans and operations. | - Sedu Series | |
| | - Critical (Major) compliance - | - Rudua Series | |
| | | - Segari Series | |
| | | - Rengam Series | |

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|--|--|---|
| | | |
| | - Lunas Series | |
| | - Penor Series (Shallow Peat <3') | |
| | - Cherang Hangus Series | |
| | - Erong Series (Moderately Deep Peat 3' – 6') | |
| | - Gondang Series (Deep Peat > 6') | |
| | - Sogomana Series | |
| | Latest Soil Survey was conducted as per sample report by Research Unit; Trial # 2.427 (3); Field # 32; Date: 10/4/2022. | |
| Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance - | The procedure namely SOP for Peat Subsidence Measurement dated 31/3/2014 was implemented accordingly. Annual peat subsidence measurements report was sighted for two areas (Bek Nielsen Sanctuary field 51 and field 97). Drainability assessment continued to be conducted since 2008 by UPRD. The internal memo from Director of Research dated 20/4/2016 was sighted. It was recommended field drain intensity of 1:4 rows of oil palms with a planting density of 160 palms per hectare. | Complied |
| Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance - | Soil surveys and topographic information (including map showing highest point is Bukit Kecil, 156m above MSL covering an area 10.7 ha) guide the planning of drainage, irrigation systems, roads, railroads and other infrastructure. Latest Soil Survey was conducted as per sample report by Research Unit; Trial # 2.427 (3); Field # 32; Date: 10/4/2022. | Complied |
| on 7.7: No new planting on peat, regardless of depth after 15 November 20 | 18 and all peatlands are managed responsibly. | |
| (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance - | At this UIE CU, no new planting has taken place since there was no land acquisition nor conversion of undeveloped area. All planting of oil palms are 3 rd generation planting on already established oil palm estate. | Complied |
| | necessary, done in accordance with the soil management plan for best practices. - Minor compliance - Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance - On 7.7: No new planting on peat, regardless of depth after 15 November 20 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. | - Cherang Hangus Series - Erong Series (Moderately Deep Peat 3′ – 6′) - Gondang Series (Deep Peat > 6′) - Sogomana Series - Latest Soil Survey was conducted as per sample report by Research Unit; Trial # 2.427 (3); Field # 32; Date: 10/4/2022. Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices Minor compliance - Minor compliance - Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure Minor compliance - Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure Minor compliance - Soil surveys and topographic information (including map showing highest point is Bukit Kecil, 156m above MSL covering an area 10.7 ha) guide the planning of drainage, irrigation systems, roads, railroads and other infrastructure. Latest Soil Survey was conducted as per sample report by Research Unit; Trial # 2.427 (3); Field # 32; Date: 10/4/2022. The procedure namely SOP for Peat Subsidence Measurement dated 31/3/2014 was implemented accordingly. Annual peat subsidence measurements report was sighted for two areas (Bek Nielsen Sanctuary field 51 and field 97). Drainability assessment continued to be conducted since 2008 by UPRD. The internal memo from Director of Research dated 20/4/2016 was sighted. It was recommended field drain intensity of 1:4 rows of oil palms with a planting density of 160 palms per hectare. Soil surveys and topographic information (including map showing highest point is Bukit Kecil, 156m above MSL covering an area 10.7 ha) guide the planning of drainage, irrigation systems, roads, railroads and other infrastructure. Latest Soil Survey was conducted as per sample report by Research Unit; Trial # 2.427 (3); Field # 32; Date: 10/4/2022. The procedure namely SOP for Peat Subsidence Measurement dated 31/3/2014 was implemented accordingly. Annual peat subsidence measu |

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| 7.7.2 | Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance - | The peat inventory have been submit to RSPO Secretariat on June 2020 as per email verification dated 5/6/2021. | Complied |
|-------|--|---|----------|
| 7.7.3 | (C) Subsidence of peat is monitored, documented and minimised Critical (Major) compliance - | Based on Soil Survey Report of UIE Estate; January 2018 collaboration survey by UP Research and Param Agriculture Soil Survey (PASS). Monitoring started since 2008 | Complied |
| 7.7.4 | (C) A documented water and ground cover management programme is in place Critical (Major) compliance - | The documented water and ground cover management available under water management, the management implement water table monitoring by weekly basis as per Standard Operating Procedures; 4.5 Peat Subsidence Measurements; Date issued: 31/3/2014; Date revised: 1/8/2020. Programme includes a Study Methodology – Piezometer Placement and Monitoring in Peat Areas; 1 piezometer to be place every 120 hectares to monitor natural water table of the peat areas. | Complied |
| 7.7.5 | (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. | Replanting before January 2019, completed in 2018. Drainability assessment was carried out based on UP Research Department's Guidance as per Internal Memorandum; Ref. # 0.007/987/2016; Date: 20/4/2016; Field drain intensity of 1:4 rows of palm tree with planting density of 160 palms per hectare. | Complied |

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| | Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. - Critical (Major) compliance - | | |
|----------|--|--|----------|
| 7.7.6 | (C) All existing plantings on peat are managed according to the `RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance - | Replanting before January 2019, completed in 2018. Drainability assessment was carried out based on UP Research Department's Guidance as per Internal Memorandum; Ref. # 0.007/987/2016; Date: 20/4/2016; Field drain intensity of 1:4 rows of palm tree with planting density of 160 palms per hectare. | Complied |
| 7.7.7 | (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance - | Set-aside include two areas (Bek Nielsen Sanctuary field 51 and field 97) which were managed as per Standard Operating Procedures; 4.5 Peat Subsidence Measurements; Date issued: 31/3/2014; Date revised: 1/8/2020. | Complied |
| Criterio | on 7.8: Practices maintain the quality and availability of surface and ground | water. | |
| 7.8.1 | A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: | Water Management Plan was in place in UIE Estate as per sighted as following: Area of Measures Measures | Complied |
| | a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. | Peat Soils SOP on Cultivation of Peat Areas | |
| | b) Workers have adequate access to clean water. - Minor compliance - | Water for Consumption - Water pump house/water drawing facility maintenance - No leakage/faulty on pipe/tanks/valves - Correct dosage of water treatment chemicals - Periodic monitoring of untreated and treated water quality - Identify alternative source of water - Water usage monitoring | |

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| | | - Domestic wastewater - Effluent/wastewater drains piping and effluent ponds on good condition - Palm oil mill effluent - Discharge water quality monitoring | |
|-------|--|--|----------|
| | | UIE POM Water Management Plan include the following: | |
| | | - analysis/test treated water twice per year for compliance with the Ministry of Health Specification for Drinking Water Quality. | |
| | | - minimize wastage of treated water through maintenance of pipelines and monitoring of water consumption by employees | |
| | | - analyses/test source (raw) water supplying mill water treatment system per DOE 2006 Interim National Quality Water Standard. | |
| | | avoid pollution of raw water resources by implementing the pollution prevention plans and monitor the river water quality through water analysis | |
| | | treat mill effluent to required levels and regularly monitor its water discharge quality to comply with EQ (Prescribed Premises) (Crude Palm Oil) Regulations 1977 and written approval issued by DOE so as not to pollute water use by communities downstream of discharge point. | |
| 7.8.2 | (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having | maintained at 20m width. No trace of agrochemicals seen used at the visited riparian reserve. Some 273 forest trees of different | Complied |
| | occurred during the previous cycle Critical (Major) compliance - | Based on the analysis, the parameters tested (pH, BOD, COD, SS, OG, DO, AN and E. Coli) comply with class III and IV of National Water Quality Standard (NWQS). | |



| 7.8.3 | Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. | Mill effluent is treated to be in compliance with DOE license as per sample UIE Estate Water Analysis and Pesticide Usage Data 2021; Letter Ref. # 0.218(c)/806/2022; Date: 9/5/2022: | Complied |
|----------|---|---|----------|
| | - Minor compliance - | - Bruas River Inlet Water Quality Index (WQI): 67.63 | |
| | | - Bruas River Outlet Water Quality Index (WQI): 66.91 | |
| | | - Anak Macang River Inlet Water Quality Index (WQI): 65.66 | |
| | | - Anak Macang River Outlet Water Quality Index (WQI): 68.70 | |
| 7.8.4 | Mill water use per tonne of FFB is monitored and recorded. - Minor compliance - | Mill water use per tonne of FFB is monitored and recorded as following: | Complied |
| | · | - Total water for both UEI POM & UIE Estate: for Jan – Dec 2021 | |
| | | - Total monthly average population: 13,287 | |
| | | - Total water consumption: 143,498 m3 | |
| | | - Per capita: 0.03 m3/p; 6.51 gallons/p | |
| Criterio | on 7.9: Efficiency of fossil fuel use and the use of renewable energy is opting | nised | |
| 7.9.1 | A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance - | Plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented including the installation and operation of biogas plant. Efficiency of fossil fuels monitored and documented as the Comparative Statistics for Petrol, Diesel and Lubricant Usage. Sighted the records of monitoring of diesel usage by UIE Mill and Estate as following: | Complied |
| | | - To-date 2022 total: 181,728 litres | |
| | | - 2021 total: 614,948.00 litres | |

Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

| 7.10.1 | (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance - | GHG emissions are identified and assessed where the monitored data reported in Palm GHG were found consistent to the raw data source amongst all the following: - Fossil fuel consumption - Chemical consumption - Palm Kernel Shell (PKS) produced - Palm Oil Mill Effluent (POME) produced 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. Emission monitoring calculated using Palm GHG v4. | Complied |
|--------|--|---|----------|
| 7.10.2 | (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance - | No new development within UIE Estate. | Complied |
| 7.10.3 | (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance - | Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission. As prescribed under DOE's Compliance Schedule, the mill is obliged to conduct stack sampling minimum once a year. Verified the sample records of Isokinetic and Air Emission Monitoring & Dark Smoke Observation Report; Report ref. # MURNI/0421/4785; Monitoring Date: 20/4/2021; Reporting Date: 30/4/2021 by CSK Murni Services Sdn. Bhd.; Dust concentration test results: 75 mg/m3. | Complied |

| | | Dark smoke emissions were monitored through Continuous Emissions Monitoring System (CEMS) which link to the DOE for real-time data reporting. | |
|----------|--|---|----------------|
| Criterio | n 7.11: Fire is not used for preparing land and is prevented in the manage | ed area | |
| 7.11.1 | (C) Land for new planting or replanting is not prepared by burning Critical (Major) compliance - | There was no new planting and replanting which prepared by burning and in lined with Environmental and Biodiversity Policy which signed by UPB CEO on 5th February 2020. | Complied |
| 7.11.2 | The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance - | For fire watch, for aerial monitoring was conducted mainly for hot spot area/peat soil area through Global Forest Watch Fires (GFWF). UPB has subscribed to GFWF since 10/09/2017. In case of any fire detected by GFWF, an alert will be sent to PIC for mill and estate. On site preparedness, 3200 gallon of portable water browser is readily available to fight any potential fire. | Complied |
| | | On top GFWF, field patrolling were performed as per record sighted. The patrolling is conducted daily by auxiliary police according to the patrolling schedule. The monitoring for any fire at the estate will also be conducted by workers and mandores. In case of any fire detected, mandores will report to the management/security head. There is a watch tower near the main office for fire observation. | |
| 7.11.3 | The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance - | Engagement with adjacent stakeholders was conducted during latest external stakeholder meeting on 12/5/2022 in UIE Estate Community Hall. UPB SOP's on Fire Safety Management was presented during the meeting. | Complied |
| | n 7.12: Land clearing does not cause deforestation or damage any area recest. HCVs and HCS forests in the managed area are identified and protected | | h Carbon Stock |
| 7.12.1 | (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. | No new development within UIE Estate. | Complied |

| 7.12.2 | A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance - (C) HCVs, HCS forests and other conservation areas are identified as follows: a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid. b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations. | Initial HCV assessment was conducted by Wild Asia as per report entitled "A Conservation Assessment of United Plantation's Perak Estates – Conservation Values & Recommendations"; Report date: 14/1/2008. The consecutive re-assessment was conducted in-house as per report of In-House Assessment for the Identification of High Conservation Values – United Plantations Berhad United International Enterprise (UIE) Estate; Assessment conducted on 5/8/2020 by Lee Kian Wei who hold a Bachelor in Sustainable Science. The in-house assessment was referred to the Common Guidance for the identification of High Conservation Values endorsed by HCV Resource Network in September 2017. Based on both assessments, the HCV Values identified in UIE Estate are HCV 4 - Ecosystem services: Basic ecosystem services in critical situations, including protection of water catchments and control of | Complied |
|--------|--|---|----------------|
| | PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance - | Based on both assessments, the HCV Values identified in UIE Estate are HCV 4 - Ecosystem services: Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes as following: - Bukit Kecil Jungle Reserve; HCV; 10.53 ha | |
| | | Sungai Anak Machang Riparian; HCV; 2 haSungai Beruas Riparian; HCV; Boundary to riparian reserve | |
| | | - Kingham-Cooper, Nursery, Bek Nielsen Sanctuaries; Self- declared conservation; 128.1 ha | |
| 7.12.3 | Indicator is not applicable in Malaysia context | Not applicable. | Not Applicable |

| 7.12.4 | (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance - | Based on the assessor recommendations, an integrated management plan has been established to protect and/or enhance identified HCVs as following: - Signboard installation/erection - No spraying and manuring in riparian - Planting of jungle trees - Monitoring Monitoring of management action include the following: - Wildlife sightings - Signboards - Soil erosions - Signs of illegal activities including pollution & spraying/manuring Based on recent 2022 wildlife sightings monitoring records, RTE were sighted a following: - RTE: Otter; Date: 8/1/2022 - RTE: Eagle; Date: 5/2/2022 - RTE: Flat-headed cat (Kucing Hutan); Date: 21/3/2022 However, management plan to protect and/or enhance HCVs within UIE Estate 1B mainly for the river banks of Sg. Beruas Riparian Self-Conservation area near Canal A could be further improved. Hence, an OFI has been raised on the matter. | OFI |
|--------|---|--|----------|
| 7.12.5 | Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance - | No local communities have been identified in self-declared HCV areas within UIE Estate. | Complied |



| 7.12.6 | All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance - | Based on the internal and external stakeholders consultation as well as field visits and records verifications, there are evidences to continuously prevent and discourage illegal or hunting, fishing or collecting activities. Signage as well as routine patrolling activities were carried out as part of the efforts to create awareness among employees about biodiversity. The latest awareness training on environmental and biodiversity was conducted on 12/5/2022 to all estate and mill employees as well as external stakeholders which also includes the HCV/Riparian awareness topic. | Complied |
|--------|---|--|----------|
| 7.12.7 | The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance - | Based on the initial Wild Asia assessor recommendations, an integrated management plan has been established to protect and/or enhance identified HCVs as following: - Signboard installation/erection - No spraying and manuring in riparian - Planting of jungle trees - Monitoring Monitoring of management action include the following: - Wildlife sightings - Signboards - Soil erosions - Signs of illegal activities including pollution & spraying/manuring Based on recent 2022 wildlife sightings monitoring records, RTE were sighted a following: - RTE: Otter; Date: 8/1/2022 - RTE: Eagle; Date: 5/2/2022 - RTE: Flat-headed cat (Kucing Hutan); Date: 21/3/2022 | Complied |



| 7.12.8 | (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance - | | Complied |
|--------|---|--|----------|
|--------|---|--|----------|



Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2021 for UIE 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:

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

The summary of the Net GHG emitted in 2021 for UIE Palm Oil Mill and supply base are as following:

| Emission per product | tCO₂e/tProduct |
|----------------------|----------------|
| СРО | 2.17 |
| РКО | 2.17 |

| Extraction | % |
|------------|-------|
| OER | 21.81 |
| KER | 4.31 |
| | |

| Production | t/yr |
|--------------|------------|
| FFB Process | 284,198.00 |
| CPO Produced | 61,983.58 |
| PKO Produced | 12,248.93 |

| Land Use | | На |
|-----------------------------|-------|-----------|
| OP Planted Area | | 8,958.00 |
| OP Planted on peat | | 1,164.54 |
| Conservation (forested) | | 91.00 |
| Conservation (non-forested) | | 0.00 |
| | Total | 10,213.54 |

Summary of Field Emission and Sink

| | Own Crop* | | Group | | 3 rd Party | | Total | |
|--|------------|----------------|-------|----------------|-----------------------|----------------|------------|----------------|
| | tCO₂e | tCO₂e / FFB | tCO₂e | tCO₂e / FFB | tCO₂e | tCO₂e / FFB | tCO₂e | tCO₂e / FFB |
| Emission | | | | | | | | |
| Land Conversion | 88,474.84 | 0.31 | 1 | 1 | 1 | - | 88,474.84 | 0.31 |
| CO ₂ Emission from fertilizer | 74,751.24 | 0.26 | 1 | 1 | 1 | - | 74,751.24 | 0.26 |
| NO ₂ Emission | 8,717.47 | 0.03 | 1 | 1 | 1 | - | 8,717.47 | 0.03 |
| Fuel Consumption | 9,836.22 | 0.03 | - | - | - | - | 9,836.22 | 0.03 |
| Peat Oxidation | 1,615.75 | 0.01 | 1 | 1 | 1 | - | 1,615.75 | 0.01 |
| Sink | Sink | | | | | | | |
| Crop Sequestration | -83,862.41 | -0.30 | 1 | ı | 1 | - | -83,862.41 | -0.30 |
| Conservation Sequestration | -834.47 | ı | - | - | - | - | -834.47 | - |
| Total | 162,282.52 | 0.57 | - | - | - | - | 162,282.52 | 0.57 |

*Note: Includes both estates and smallholders



Summary of Mill Emission and Credit

| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 4,963.11 | 0.02 |
| Fuel Consumption | 309.49 | - |
| Grid Electricity Utilization | - | - |
| Credit | | |
| Export of Grid Electricity | -1,182.90 | - |
| Sales of PKS | -5,374.05 | - 0.02 |
| Sales of EFB | - | - |
| Total | -1,284.35 | - |

Summary of Kernel Crusher Emission and Credit (if applicable)

| Emissions | tCO₂e |
|-------------------------|-------|
| PK from own mill | - |
| PK from other source | - |
| Fuel Consumptions | - |
| Total Crusher emissions | - |

^{*}This mill has no kernel crusher operation.

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

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



Appendix C: Location Map of Certification Unit and Supply bases

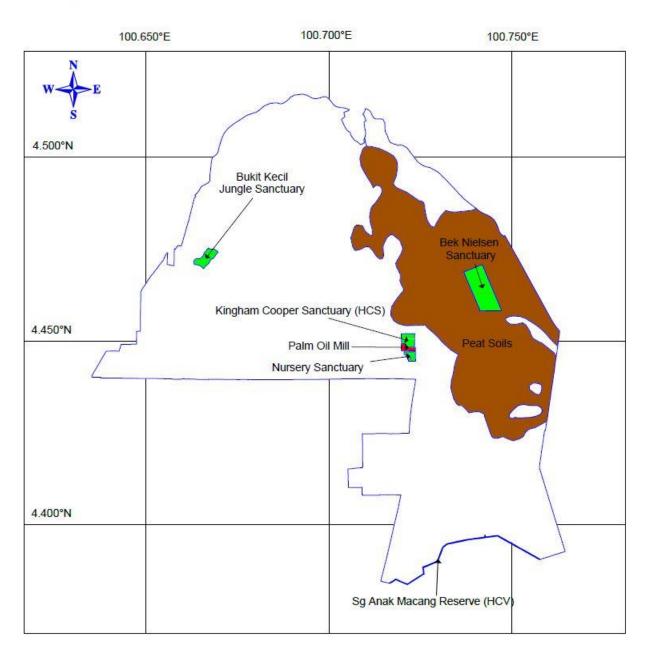




Appendix D: Estate Field Map



United Plantations Berhad UIE Estates





Appendix E: List of Smallholder Registered and/or sampled

| Latitude (N) Longitude (E) Total Cartified Area Planted Ar | No Nam | e of farmer | Location | GPS Reference | | Area Summary (Ha) | | Forecasted annual FFB | Date of joining | Smallholder ID |
|--|-------------|-------------|-------------------------|---------------|---------------|----------------------------|-----------------|-----------------------|-----------------|-------------------|
| NI N/A | | | | Latitude (N) | Longitude (E) | Total Certified Area | Planted Area | Production (MT) | | |
| | Nil N/A | | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
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| | | | | | | | | N/ C | | |
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Appendix F: 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

ISS Independent Smallholder Standard

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