

MSPO Public Summary Report
Revision 2 (Nov 2021)**MALAYSIAN SUSTAINABLE PALM OIL**
MSPO OPMC Public Summary Report

- ☐ Initial Assessment
- ☒ Annual Surveillance Assessment (1_1)
- ☐ Recertification Assessment (Choose an item.)
- ☐ Extension of Scope

| UNITED PLANTATIONS BERHAD |
|----------------------------------------------------------------------------------------------------------------------------|
| Client Company (HQ) Address: Jalan Kuala Selangor - Teluk Intan, Jendarata Estate 36009 Teluk Intan, Perak, Malaysia |
| Certification Unit: United International Enterprise (UIE) UIE Palm Oil Mill and UIE Estate |
| Date of Final Report: 12/8/2024 |

Report prepared by:
Nor'ain binti Mohd Nasir (Lead Auditor)

Report Number: 3984777

Assessment Conducted by:
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Section 1: Executive Summary

| 1.1 Organizational Information and Contact Person | | | |
|---------------------------------------------------|------------------------------------------------------------------------------------------|-------------------------|---------------------------|
| Company Name | United Plantations Berhad | | |
| Certification Unit | Certification Unit | MPOB License No. | Expiry Date |
| | UIE Palm Oil Mill | 500124504000 | 30/01/2025 |
| | UIE Estate | 502076202000 | 31/07/2024 |
| Address | Jalan Kuala Selangor – Teluk Intan, Jendarata Estate, 36009 Teluk Intan, Perak, Malaysia | | |
| Management Representative | Lee Kian Wei | | |
| Website | www.unitedplantations.com | E-mail | lkw@unitedplantations.com |
| Telephone | 017-6093288 | Facsimile | 05-6417100 |

| 1.2 Certification Information | | | |
|---------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|------------|
| Certificate Number | Mill: MSPO 693205 Estate: MSPO 693206 | Certificate Start Date | 28/09/2023 |
| Date of First Certification | 28/09/2018 | Certificate Expiry Date | 27/09/2028 |
| Scope of Certification | <input checked="" type="checkbox"/> Mill: Production of Sustainable Palm Oil and Palm Oil Products <input checked="" type="checkbox"/> Estate: Production of Sustainable Oil Palm Fruits | | |
| Visit Objectives | The objective of the assessment is to conduct an annual surveillance assessment 1_1 and look for positive evidence to ensure the elements of the scope of certification and the requirements of the management standard are effectively addressed by the organization's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organization's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan. | | |
| Standard | <input type="checkbox"/> MSPO MS 2530-2:2013 – General Principles for Independent Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills | | |
| Recertification Visit Date (RAV) 1 | 24 - 27/07/2023 | | |
| Continuous Assessment Visit Date (CAV) 1_1 | 02 - 04/07/2024 | | |
| Continuous Assessment Visit Date (CAV) 1_2 | - | | |
| Continuous Assessment Visit Date (CAV) 1_3 | - | | |
| Continuous Assessment Visit Date (CAV) 1_4 | - | | |

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1.3 Other Certifications

| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date |
|--------------------|--------------------------------------------------------------------------------------------------------------|-------------------------------|-------------|
| RSPO 693198 | RSPO Principles & Criteria of Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019 | BSI Services Malaysia Sdn Bhd | 28/09/2027 |
| MSPO 709995 | MSPO Supply Chain Certification Standard (MSPO SCCS) 1/10/2018 | BSI Services Malaysia Sdn Bhd | 11/07/2029 |

1.4 Location of Certification Unit

| Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder) | Site Address | GPS Reference of the site office | |
|-------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|----------------------------------|-------------------|
| | | Latitude | Longitude |
| UIE Palm Oil Mill | KM 9 Jalan Bruas - Ayer Tawar, Pantai Remis, 34900 Perak, Malaysia | 4° 26' 52.12" N | 100° 43' 14.48" E |
| UIE Estate | KM 9 Jalan Bruas - Ayer Tawar, Pantai Remis, 34900 Perak, Malaysia | 4° 26' 52.12" N | 100° 43' 14.48" E |

1.5 Certified Area

| Estate | Total Planted (Mature + Immature) (ha) | Conservation / HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
|-------------------|----------------------------------------------|----------------------------|-----------------------------------|--------------------|-----------------|
| UIE Estate | 8,949.56 | 12.53 | 1,403.11 | 10,365.20 | 86.34 |
| Total (ha) | 8,949.56 | 12.53 | 1,403.11 | 10,365.20 | |

1.6 Plantings & Cycle

| Estate | Age (Years) | | | | | Mature | Immature |
|-------------------|-------------|-----------------|-----------------|----------|----------|-----------------|----------|
| | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 | | |
| UIE Estate | 0 | 5,166.41 | 3,783.15 | 0 | 0 | 8,949.56 | 0 |
| Total (ha) | 0 | 5,166.41 | 3,783.15 | 0 | 0 | 8,949.56 | 0 |

1.7 Certified Tonnage of FFB

| Estate | Tonnage / year | | |
|------------|---------------------------------|-------------------------------|--------------------------------|
| | Estimated (Sept 23 - Aug 24) | Actual (July 23 - June 24) | Forecast (Sept 24 - Aug 25) |
| UIE Estate | 295,000.00 | 309,322.86 | 310,000.00 |

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| | | | |
|-------------------|-------------------|-------------------|-------------------|
| Total (mt) | 295,000.00 | 309,322.86 | 310,000.00 |
|-------------------|-------------------|-------------------|-------------------|

1.8 Uncertified Tonnage of FFB

| Estate | Tonnage / year | | |
|-------------------|---------------------------------|-------------------------------|--------------------------------|
| | Estimated (Sept 23 - Aug 24) | Actual (July 23 - June 24) | Forecast (Sept 24 - Aug 25) |
| N/A | N/A | N/A | N/A |
| Total (mt) | N/A | N/A | N/A |

1.9 Certified Tonnage

| Mill Capacity: 60 MT/hr SCC Model: SG | Estimated (Sept 23 - Aug 24) | Actual (July 23 - June 24) | Forecast (Sept 24 - Aug 25) |
|--------------------------------------------------------------------|---------------------------------|-------------------------------|--------------------------------|
| | FFB | FFB | FFB |
| | 295,000.00 | 309,322.86 | 310,000.00 |
| | CPO (OER: 23 %) | CPO (OER: 21.47 %) | CPO (OER: 23 %) |
| | 67,850.00 | 66,407.01 | 71,300.00 |
| | PK (KER: 4.8 %) | PK (KER: 4.07 %) | PK (KER: 4.8 %) |
| | 14,160.00 | 12,600.42 | 14,880.00 |

1.10 Actual Sold Volume (CPO)

| CPO (mt) | MSPO Certified | Other Schemes Certified | | Conventional | Total |
|-----------|----------------|-------------------------|-----------|--------------|------------------|
| | | ISCC | RSPO | | |
| 66,407.01 | 0 | 0 | 66,407.01 | 0 | 66,407.01 |

1.11 Actual Sold Volume (PK)

| PK (mt) | MSPO Certified | Other Schemes Certified | | Conventional | Total |
|-----------|----------------|-------------------------|-----------|--------------|------------------|
| | | ISCC | RSPO | | |
| 12,600.42 | 0 | 0 | 12,600.42 | 0 | 12,600.42 |

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Section 2: Assessment Process

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 Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 02-04/07/2024. The audit programme is included as Section 2.4. The approach to the audit was to treat the UIE Palm Oil Mill and UIE Estate as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

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. MS 2530-2:2013 or MS 2530-3:2013 or MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The Certification Unit were not using MSPO certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSPO Logo and related claims.

The estates or smallholders sample were determined based on formula $S = r\sqrt{n}$ where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula $(r\sqrt{n})$; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members (include calculation of sampling taken). The sampled smallholder listed in Appendix B.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the MSPO 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 3.6.

This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

All the previous nonconformities are remains closed. The assessment findings from the reassessment are detailed in Section 4.2.

This report was externally reviewed by MSPO approved Peer Reviewer prior to certification and recertification decision by BSI. For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

| Assessment Program | | | | | |
|------------------------------|-----------------------------|---------------------|---------------------|---------------------|---------------------|
| Name (Certification Unit) | Year 1 (Recertification) | Year 2 (ASA 1_1) | Year 3 (ASA 1_2) | Year 4 (ASA 1_3) | Year 5 (ASA 1_4) |
| UIE Palm Oil Mill | ✓ | ✓ | ✓ | ✓ | ✓ |
| UIE Estate | ✓ | ✓ | ✓ | ✓ | ✓ |

Tentative Date of Next Visit: July 7, 2025 - July 9, 2025

Total No. of Mandays: 7 mandays

2.1 BSI Assessment Team

| Team Member Name | Role (Team Leader or Team member) | Qualifications (Short description of the team members) |
|--------------------------------|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Nor'ain binti Mohd Nasir (NMN) | Team Leader | <p>Education: She graduated in Bachelor of Science (Hons) (Plantation Technology and Management) from University Teknologi Mara (UiTM).</p> <p>Work Experience: She has 10 years working experience in plantation company with various departments such as Estate Operations, Risk and System Management Department and Sustainability and Quality Department prior to joining Certification Body as an Auditor for more than 4 years. She is familiar with oil palm operations and its supply chain including Social, Environmental, Safety and Health, Legal and Good Agricultural practices. She is involved in auditing MSPO OPMC, MSPO SCCS, RSPO P&C, RSPO SCCS, ISCC EU and PLUS Basic Training, ISCC Waste & Residue and ISCC Independent Smallholder.</p> <p>Training attended: She has completed 14001:2015 (2019), ISO 9001:2015 (2024), ISO 45001:2018 (2024), Endorsed MSPO Auditor Course (2019), Endorsed MSPO SCCS Auditor Course (2019), Endorsed RSPO P&C Lead Auditor Course (2019), Endorsed RSPO SCCS Lead Auditor Course (2019), SA8000 (2019), ISCC EU and PLUS Basic Training (2019), ISCC Waste And Residue (2020), ISCC Independent Smallholder (2020), ISCC (ARIA) Platform (2023), Roundtable on Sustainable Biomaterials (RSB) (2020), Refresher-endorsed RSPO P&C 2018 Lead Auditors Training Course (2024) and RSPO-endorsed RSPO SCCS Refresher Course (2022).</p> <p>Aspect covered in this audit:</p> |

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| | | |
|--------------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | <p>During the assessment she covered on aspects of management commitment, internal audit, management review, continuous improvement plan, social, stakeholders' consultation, and employee condition.</p> <p>Language proficiency: Bahasa Malaysia and English.</p> |
| Mohd Isa bin Hasim (MIH) | Team Member | <p>Education: He holds the Diploma in Mechanical Engineering, UiTM Pulau Pinang and Diploma in Palm Oil Milling Technology, MPOB Bangi.</p> <p>Work Experience: He started his career as Assistant Engineer at Sime Darby Plantation and obtained working experience almost 8 years in Palm Oil Mill. Later he joins in petrochemical plant for 3 years as Steam Engineer before he joins as Freelance MSPO Auditor with 6 years' with various certificate body.</p> <p>Training attended: He has completed SA 8000, ISO 9001:2015 Lead Auditor Course, MSPO OPMC Lead Auditor Course, MSPO SCCS Lead Auditor Course, IMS Lead Auditor Course, RSPO P&C Lead Auditor Course, RSPO SCCS Lead Auditor Course. He also has a competency license of CEPSSWAM Schedule Waste Management, Safety & Health Officer (SHO) DOSH Green Book, Construction Safety & Health Officer (CSHO) CIDB, Steam Engineer Grade 1, DOSH Putrajaya.</p> <p>Aspect covered in this audit: Legal requirements, Land use right, safety and health, training and competency, economic and financial plan.</p> <p>Language proficiency: English and Bahasa Malaysia.</p> |
| Amir bin Bahari (ABB) | Team Member | <p>Education: He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996.</p> <p>Work Experience: He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment, he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 718 man-days to-date in the auditing profession after ending career in the plantation industry.</p> <p>Training attended: Fundamental and auditing in ISO 9001, ISO 14001, OHSAS 18001, MSPO & also RSPO LA Assessor Course.</p> <p>Aspect covered in this audit: During the assessment he covered on transparency & traceability, environment management plan, efficiency of energy, waste management, reduction of pollution, natural water resources and biodiversity.</p> <p>Language proficiency: English and Bahasa Malaysia.</p> |

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2.2 Impartiality and conflict of interest

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

2.3 Accompanying Persons

| No. | Name | Role |
|-----|------|------|
| | N/A | |

2.4 Assessment Plan

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

| Date | Time | Subjects | NMN | MIH | ABB |
|-----------------------------------------------|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----|-----|
| Monday, 01/07/2024 | - | Audit team travel to hotel | √ | √ | √ |
| Tuesday, 02/07/2024 UIE Mill | 08:30 - 09:30 | Opening Meeting Confirmation of audit scope and audit plan Presentation by Lead Auditor Verification on previous audit finding | √ | √ | √ |
| | 09:30 - 13:00 | Mill Visit Processing area (reception station – dispatch station), workshop, schedule waste store, chemical store, lubricant store, water treatment plant, laboratory, effluent treatment plant, diesel skid tank, mill housing and landfill area. Personal Interview: Operation workers, and staffs Scope Assessment: Social, safety and environment issues | √ | √ | √ |
| | 13:00 - 14:00 | Lunch Break | | | |
| | 14:00 - 16:30 | Document Review (MS 2530-4:2013 Part 4) P1: Management Commitment & Responsibilities P2: Transparency P3: Compliance to Legal Requirements P4: Social Responsibility, Health, Safety and Employment Condition P5: Environment, Natural Resources, Biodiversity and Ecosystem Services P6: Best Practices | √ | √ | √ |
| | 16:30 - 17:00 | Interim Closing Meeting | √ | √ | √ |

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| Date | Time | Subjects | NMN | MIH | ABB |
|---------------------------------------------------|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----|-----|
| Wednesday, 03/07/2024 UIE Estate | 08:30 - 13:00 | Field Visit Field operation such as harvesting, manuring, spraying, boundary inspection, buffer zone area, HCV area, workshop, chemical store, fertilizer store, schedule waste store, chemical mixing area, clinic, workers housing area and landfill area. Personal Interview: Operation workers, and staffs Scope Assessment: Social, safety and environment issues Stakeholder Consultations Consultation with relevant stakeholders which consists of various categories such as government agencies/ enforcers, NGO, contractors, suppliers, surrounding communities, neighboring estates, smallholders, villages, workers representative, etc. | √ | √ | √ |
| | 13:00 - 14:00 | Lunch Break | | | |
| | 14:00 - 17:00 | Document Review (MS 2530-3:2013 Part 3) P1: Management commitment and responsibility, P2: Transparency P3: Compliance to legal requirement P4: Social, health, safety and employment condition P5: Environment, natural resources and biodiversity P6: Best practices P7: Development of New Planting (<i>if any</i>) | √ | √ | √ |
| | 17:00 - 17:30 | Interim Closing Meeting | √ | √ | √ |
| Thursday, 04/07/2024 UIE Mill | 08:30 - 10:30 | Document Review (MS 2530-4:2013 Part 4) P1: Management commitment and responsibility, P2: Transparency P3: Compliance to legal requirement P4: Social, health, safety and employment condition P5: Environment, natural resources and biodiversity P6: Best practices | √ | √ | - |
| | 10:30 - 11:30 | Preparation on closing meeting Preparation of closing slide | √ | √ | - |
| | 11:30 - 12:30 | Closing Meeting | √ | √ | - |

Section 3: Assessment Findings

3.1 Details of audit results

This assessment has been assessed using the following MSPO normative requirements. The assessment details are provided in Appendix A.

- ☐ MSPO MS 2530-2:2013 – General Principles for Independent Smallholders
- ☒ MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders
- ☒ MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

3.2 Details of Nonconformities and Opportunity for improvement

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

During the assessment there were One (1) Minor nonconformities and One (1) OFI raised. The UIE Palm Oil Mill and UIE 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 below is the summary of the non-conformity raised during this assessment.

| Non-Conformity Report | | | |
|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|------------------------------------|
| NCR Ref #: | 2518252-202407-N1 | Issue Date: | 04/07/2024 |
| Due Date: | Next Assessment | Date of Closure: | Open |
| Area/Process: | UIE Palm Oil Mill | Clause & Category: (Major / Minor) | MSPO 2530 Part 4: 4.5.3.2 Minor |
| Requirements: | A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution | | |
| Statement of Nonconformity: | Waste management and disposal plan was not effectively documented and implemented. | | |
| Objective Evidence: | Observed during site visit, a few spots of contaminated soil were evident at mill's workshop/open parking area. However, waste type/category for contaminated soil (dripping/leakage from tractor) was not identified in the waste management plan dated 10/2/2024 under UIE Engineering Department. | | |
| Corrections: | <ol style="list-style-type: none"> 1. The contaminated soil to be included in the waste management plan. 2. Drip trays to be placed under each parked tractor or the tractors which are under maintenance. 3. Training to be provided for the workshop operators to ensure No. 2 is adhered and any contaminated soil must be disposed as scheduled waste. | | |

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| Root cause analysis: | <ol style="list-style-type: none"> 1. The management was not aware about the handling of contaminated soil in the event of any oil spillage from parked tractors which may lead to soil contamination. 2. The covered parking area for vehicles particularly the tractors found inadequate to cater the number of tractors. |
| Corrective Actions: | <ol style="list-style-type: none"> 1. The mill management will obtain quotation from the contractor to extend the parking area. 2. The mill management will submit the quotation to CED for official approval and timeline to complete the construction work. |
| Assessment Conclusion: | The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment. |

| Opportunity For Improvement | | | |
|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|-----------------------------------|
| Ref: | 2518252-202407-I1 | Clause: | MSPO 2530 Part 4: 4.4.4.2 (b) (g) |
| Area/Process: | UIE Palm Oil Mill | | |
| Objective Evidence: | <p>The management has complied with legal requirements and ensured that Chemical Exposure Monitoring (CEM) and OSH Committee Meetings are conducted. However,</p> <ol style="list-style-type: none"> 1. The Chemical Exposure Monitoring (CEM) report monitoring can be enhanced further. 2. The OSH Committee Meetings are conducted at the required frequency as per the Occupational Safety and Health (Safety and Health Committee) Regulations 1996. | | |

| Noteworthy Positive Comments | |
|------------------------------|--------------------------------------------------------------------------|
| 1 | Good cooperation given by the management and GSD team. |
| 2 | No negative comments raised by stakeholders during consultation session. |
| 3 | Good estate and mill management practices demonstrated during audit. |

3.3 Status of Nonconformities Previously Identified and OFI

| Non-Conformity Report | | | |
|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|---------------------------------------|
| NCR Ref #: | 2381108-202307-N1 | Issue Date: | 27/07/2023 |
| Due Date: | 26/10/2023 | Date of Closure: | 04/07/2024 |
| Area/Process: | UIE Estate | Clause & Category: (Major / Minor) | MSPO 2530 Part 3: 4.4.4.2(i) Minor |
| Requirements: | <p>The occupational safety and health plan shall cover the following:</p> <p>a) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> | | |
| Statement of Nonconformity: | Monitoring of First Aid Box Items was not effectively implemented. | | |

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| Objective Evidence: | During First Aid Box Inspection at UIE Estate Field 102, it was found 2 items was not available (Plastic Forceps and Safety Pin) with reference 16 Items First Aid Box UPB Listing. |
| Corrections: | <ol style="list-style-type: none"> 1. Monitoring checklist for the items in first aid box has been further improved to specify each item in the first aid box. 2. Briefing on the revised checklist and items in first aid box has been provided by our Group Safety Officer to the Hospital Assistant of UIE with the presence of estate management. |
| Root cause analysis: | Lack of understanding by the Hospital Assistant who is in-charge of the replenishment and to monitor each item in the first aid box on a monthly basis. |
| Corrective Actions: | <ol style="list-style-type: none"> 1. The revised monitoring checklist for the items in first aid box will be circulated by the Group Safety Officer to all Estate Managers and Heads of Department. Unannounced OSH audits will be conducted by the Safety Officer from time to time in order to ensure the revised checklist with monitoring of every item in the first aid box has been utilized. 2. The monitoring checklist for first aid box will be included in the OSH internal audit checklist. |
| Assessment Conclusion: | The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment. |
| Verification Statement: | <p>The management has provided the first aid box and allocation at certain area. The first aid box was kept by the Person In charge. During audit it was sighted the first aid box, and the inspection was done by Hospital Assistant (HA). During audit it was verified:</p> <ol style="list-style-type: none"> 1. The inspection First Aid Box done by Hospital Assistant (HA) latest made on 12/06/2024. 2. The checklist has been distributed by group safety officer to all estate, and it was checked during the internal audit. 3. The monitoring of first aid box has been included in audit checklist. |

| Non-Conformity Report | | | |
|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|---------------------------------------|
| NCR Ref #: | 2381108-202307-N2 | Issue Date: | 27/07/2023 |
| Due Date: | 26/10/2023 | Date of Closure: | 04/07/2024 |
| Area/Process: | UIE POM | Clause & Category: (Major / Minor) | MSPO 2530 Part 4: 4.4.4.2(i) Minor |
| Requirements: | <p>The occupational safety and health plan shall cover the following:</p> <p>a) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> | | |
| Statement of Nonconformity: | Monitoring of First Aid Box Items was not effectively implemented. | | |
| Objective Evidence: | During first aid box inspection at UIE POM, it was found 2 units of first aid box at Laboratory and New Boiler contained with expired contents which is 6 units of Triangular Bandage (Hospital Quality 100% Pure Cotton 36"x36"x51") Expired on 03/2021. | | |

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| Corrections: | <ol style="list-style-type: none"> 1. Monitoring checklist for the items in first aid box has been further improved to specify each item in the first aid box. 2. Briefing on the revised checklist and items in first aid box has been provided by our Group Safety Officer to the Hospital Assistant of UIE with the presence of mill management. |
| Root cause analysis: | Lack of understanding by the Hospital Assistant who is in-charge of the replenishment and to monitor each item in the first aid box on a monthly basis. |
| Corrective Actions: | <ol style="list-style-type: none"> 1. The revised monitoring checklist for the items in first aid box will be circulated by the Group Safety Officer to Mill Manager and Heads of Department. Unannounced OSH audits will be conducted by the Safety Officer from time to time in order to ensure the revised checklist with monitoring of every item in the first aid box has been utilized. 2. The monitoring checklist for first aid box will be included in the OSH internal audit checklist. |
| Assessment Conclusion: | The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment. |
| Verification Statement: | <p>The management has provided the first aid box and allocation at certain area. The first aid box was kept by the Person In charge. During audit it was sighted the First Aid Box, and the inspection was done by Hospital Assistant (HA). During audit it was verified:</p> <ol style="list-style-type: none"> 1. The inspection First Aid Box done by Hospital Assistant (HA) latest made on 12/06/2024. 2. The checklist has been distributed by group safety officer to all operating, and it was checked during the internal audit. The monitoring of first aid box has been included in audit checklist |

| Opportunity For Improvement | | | |
|--------------------------------|-----|----------------|-----|
| Ref: | N/A | Clause: | N/A |
| Area/Process: | N/A | | |
| Objective Evidence: | N/A | | |
| Verification Statement: | N/A | | |

3.4 Summary of the Nonconformities and Status

| CAR Ref. | Clause & Category (Major / Minor) | Issued Date | Status & Date (Closure) |
|-------------------|-----------------------------------|-------------|-------------------------|
| 2381108-202307-N1 | 4.4.4.2(i) Part 3 Minor | 27/07/2023 | Closed on 04/07/2024 |
| 2381108-202307-N2 | 4.4.4.2(i) Part 4 Minor | 27/07/2023 | Closed on 04/07/2024 |
| 2518252-202407-N1 | 4.5.3.2 Part 4: Minor | 04/07/2024 | Open |

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3.5 Issues Raised by Stakeholders

| IS # | Description |
|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | <p>Feedback: Estate Community – Cxxxxxn, Mxxi Mxxxxt and Grxxxxxs Sxxp (Ms. Kxxxxxi, Mr. Cxxw Kxxn Oxx and Mr. Mxx Fxx)</p> <p>All aware on the MSPO and RSPO certification requirements as the management has briefed them during stakeholder consultation. There is yearly agreement have been signed with the management and the rental rates are affordable and negotiable. The copy of appropriate documents such as SSM, License of Retail for Scheduled Controlled Goods, Foods Handling Injection will be sent to management. Water and electricity supply and building maintenance are in order. They will meet the management to discuss any related matters.</p> <p>Management Responses: The management always maintain the close relationship with internal communities.</p> <p>Audit Team Findings: No further issue.</p> |
| 2 | <p>Feedback: Temple and Mosque/'Surau' Committee Secretary</p> <p>The temple and 'Surau' is in the estate. The water and electricity supply were managed by the management including building maintenance. The management always allowed external communities who visit the temple with the permission from AP Post and Sergeant. The temple Secretary also one of the worker rep. He said any issues related to workers welfares will be discussed in the worker welfare committee meeting.</p> <p>Management Responses: The management always maintain the close relationship with internal and external communities.</p> <p>Audit Team Findings: No further issue. Evident during the audit the temple and 'surau' in good and clean conditions.</p> |
| 3 | <p>Feedback: Contractors (K Kxxxr Exxxxxxr, PXX Exxxxxxe and Sxi Nxxxxh Axxxxy)</p> <p>No issues arise, all contractors were provided with contract agreement and aware on the requirement to comply with standard minimum wages, EPF, SOCSO and the payment received within the stipulated time. The contractors and vendors will meet the manager directly when needed.</p> <p>Management Responses: Management will maintain good relationship with contractor.</p> <p>Audit Team Findings: No further issue. Evident the samples of the contract agreement and pay and conditions documentation of the contractor workers such as pay slip, employer contribution on EPF and SOCSO, identification number and driving licenses.</p> |
| 4 | <p>Feedback: Village (Kg. Lubok Pusing)</p> <p>The village has a good relationship with the management of the estates and mill. As at to date, there is no mill and estate operations have impacted the villager. The head of village have been invited by the management during the latest stakeholder consultation. Hopefully this relationship can continue.</p> <p>Management Responses: Management will maintain good relationship with surrounding communities.</p> <p>Audit Team Findings:</p> |

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| | |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | No further issue. |
| 5 | <p>Feedback: Neighbouring Estate (Huntly Estate) and Smallholder (Tebuk Yan)</p> <p>The estate and smallholder have good relationship with the management of the estates and mill. As at to date, there is no mill and estate operations have impacted the neighbouring estate and smallholder. There is a cleared demarcation between estate and neighbouring estate and smallholder by trenches and boundary stones. 15 years ago, Huntly Estate have sent their FFB to UIE POM before sending to outside collection centra as the UIE POM has been certified for RSPO.</p> <p>Management Responses:</p> <p>Management will maintain good relationship with neighbouring estates and smallholders.</p> <p>Audit Team Findings:</p> <p>No further issue.</p> |
| 6 | <p>Feedback: Governmental Department (DOE and DOSH)</p> <p>Received positive feedback from DOE and DOSH as there is no environmental and safety & health issues related to UIE POM and UIE Estate.</p> <p>Management Responses:</p> <p>Management will maintain good relationship with government agencies.</p> <p>Audit Team Findings:</p> <p>No further issue.</p> |



3.5 List of Stakeholders Contacted

| | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Government Officer:</p> <p>Governmental Department DOE – Mdm. Nxxxxxa</p> <p>Governmental Department DOSH – Mr. Sxxxxxi</p> | <p>Community/neighbouring village:</p> <p>Temple Committee Secretary Mr. Txxxxxxxxxm</p> <p>'Surau' Committee Secretary Mr. Yxxxi bin Sxxxxn</p> <p>Smallholder Tebuk Yan – Mr. Mxxn</p> <p>Village Kg. Lubok Pusing – Mr. Zxxxxxxn</p> <p>Neighbouring Estate Ladang Huntly - Mr. S. Mxxxxxxn</p> |
| <p>Suppliers/Contractors/Vendors:</p> <p>Canteen Miss Kxxxxi</p> <p>UIE (M) Mini Mart Mr. Cxxw Kxxn Oxx</p> <p>Sundry Shop Mr. Mxx Fxx</p> <p>Contractor K Kxxxr Exxxxxxr</p> <p>Contractor PXX Exxxxxxe</p> | <p>Worker's Representative/Gender Committee:</p> <p>Workers</p> |

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Section 4: Assessment Conclusion and Recommendation

| Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| Based on the findings during the assessment United Plantations Berhad – United International Enterprise (UIE) Business Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of United Plantations Berhad – United International Enterprise (UIE) Business Unit Certification Unit is continued. | |
| Acknowledgement of Assessment Findings | Report Prepared by |
| Name: Lee Kian Wei | Name: Nor'ain binti Mohd Nasir |
| Company name: United Plantations Berhad | Company name: BSI Services Malaysia Sdn Bhd |
| Title: Manager, Sustainability | Title: Lead Auditor |
| Signature:  Date: 26/07/2024 | Signature:  Date: 26/07/2024 |

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Appendix A: Summary of the findings by Principles and Criteria

MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Oil Palm Plantations and Organized Smallholders

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------------------------------------------------------|----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| 4.1 Principle 1: Management commitment & responsibility | | | |
| Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy | | | |
| 4.1.1.1 | A policy for the implementation of MSPO shall be established. - Major compliance - | <p>The United Plantations Berhad has established Malaysia Sustainable Palm Oil (MSPO) Policy signed by Dato' Carl Bek-Nielsan, Chief Executive Director dated 29/03/2018.</p> <p>Stated that, United Plantations Berhad shall adhere to the following key principles of MSPO to which management shall provide leadership and commitment:</p> <ul style="list-style-type: none"> • Management commitment and responsibility • Transparency • Compliance to legal requirements • Social responsibility, health, safety and employment conditions • Environment, natural resources, biodiversity and ecosystem services • Best practices • Development of new plantings <p>With the objectives such as:</p> <ul style="list-style-type: none"> • Comply with the laws and regulations of the countries, • Maintain an open and dynamic approach towards continuous improvement in respect of social responsibilities, environment protection, best practices, and economic development, | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| | | <ul style="list-style-type: none"> Establish traceability within the supply chain as an important step towards production of sustainable palm oil products, Strive to commit our employees, contractors, suppliers, trading partners and stakeholders to adhere to our company policies and cooperate with them in an ambition to find mutual improvements. <p>The policy was written in various language such as English, Bahasa Malaysia, Tamil, Bengali, Hindi, Nepali and Telegu based on the workers nationality such as Malaysian, Indonesian, Bangladeshi, Indian, and Nepalese.</p> <p>The company policies, RSPO and MSPO certification requirements have been communicated to all stakeholders as stated in the minutes meeting Stakeholders Dialogue Session with United Plantations Berhad dated 23/05/2024 was held at Community Hall, UIE Estate. The agenda includes Welcoming Speech, Briefing on Company Policy, briefing on SIA 'Risk Matrix', Joint Consultation on Social Impact Assessment (SIA), Briefing on EIA 'Risk Matrix', Joint Consultation on EIA, Joint Consultation on identification of HCV areas (if any) and Conservation Area, completion of stakeholder's questionnaires, question and answer session and closing. No comment from stakeholders. There is one question from SOCSO, Manjung Perak on whether the company provides work for OKU and the management answered yes, United Plantations Berhad will hire someone with Persons with Disabilities (PWD) conditions. Currently, UP BHD has one disabled employee at Jenderata Estate.</p> <p>Evident the attendance list that comprised of 58 attendees such as Canteen UIE, Mosque UIE, PDRM, Gender Committee, Kampung 4x Rxxxxi, SOCSO, Klinik Kesihatan, K. Kxxxxr Exxxxxxxr, C. Nallxxxxam,</p> | |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------------------------|------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| | | <p>Mill and Estate Gender representative, estate and mill manager, assistant manager and staff, Lembaga Air Perak, etc.</p> <p>The invitation has been sent between 9, 16 and 17/04/2024 to more than 28 employees and stakeholders.</p> <p>Evident the training record on policies to all workers such as Human Rights, Gender, Guest Workers/Foreign Workers, HCV Awareness, Whistleblower, CSR, publicly available documents, RSPO, MSPO, OSH and Biodiversity and Environment Policy during Muster Ground dated:</p> <ol style="list-style-type: none"> 1. UIE Estate (Estate 2) – 19/01/2024 2. UIE POM – 06/01/2024 | |
| 4.1.1.2 | <p>The policy shall also emphasize commitment to continual improvement.</p> <p>- Major compliance -</p> | <p>Stated that, United Plantations Berhad shall adhere to the following key principles of MSPO to which management shall provide leadership and commitment with the objectives such as:</p> <ul style="list-style-type: none"> • Comply with the laws and regulations of the countries, • Maintain an open and dynamic approach towards continuous improvement in respect of social responsibilities, environment protection, best practices, and economic development, • Establish traceability within the supply chain as an important step towards production of sustainable palm oil products, • Strive to commit our employees, contractors, suppliers, trading partners and stakeholders to adhere to our company policies and cooperate with them in an ambition to find mutual improvements. | Complied |
| Criterion 4.1.2 – Internal Audit | | | |
| 4.1.2.1 | Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for | The management has established Internal Audit Standard Operating Procedures, rev. 01 dated 15/02/2019. Referred Section 2.0 stated the | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| | further improvement. - Major compliance - | Internal Audit shall be conducted at least annually to implement and maintain the respective standard requirement effectively within the Group. Sighted the Internal Audit Plan in the Sustainability Internal Audit (First Round) titled Sustainability Internal Audits cum Reach & Teach, Reach & Remind Training 2024 dated 02/02/2024 including the proposed dated for Stakeholders Meeting. The audit plan was prepared by Human Resources and Sustainability & Safety (HRSS) Team in preparation for the MSPO and RSPO external audits in June and July 2024 as per following schedule: 1. UIE Estate – 20/02/2024 2. UIE POM – 21/02/2024 | |
| 4.1.2.2 | The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance - | The management has established Internal Audit Standard Operating Procedures, rev. 01 dated 15/02/2019. Stated: 1. Any non-conformities found during an internal audit shall be issued summary of findings. 2. The Estate Mangers/ Head of Department shall implement the correction and corrective action and revert to HRESH Department. Unannounced and/or follow-up audit will be carried out as deemed fit. 3. The findings raised during internal audit as well as external audits shall be deliberated during management review meeting which to be held in annual basis. Evident the MSPO & RSPO Audit Report for UIE Estate dated 20/02/2024 with correction, corrective action, and area for improvement. The action plan has been sent to HRSS on 18/03/2024. | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|--------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| 4.1.2.3 | Report shall be made available to the management for their review. - Major compliance - | Evident the MSPO & RSPO Audit Report for UIE Estate dated 20/02/2024 with correction, corrective action, and area for improvement. The report has been submitted to the HRSS and carbon copy (cc) to the related department and to the Chief Executive Director of United Plantations Berhad on 18/03/2024. | Complied |
| Criterion 4.1.3 – Management Review | | | |
| 4.1.3.1 | The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance - | The management review meeting shall be held in annual basis to deliberate the findings raised during internal audit as well as external audits as stated in the procedure. The Sustainability Management Review 2023 has been conducted on 23/05/2024 at the UIE Estate Community Hall and the agenda as follows: <ol style="list-style-type: none"> 1. Applicable Laws and Regulations – Tracking of Laws 2. Business Plan (Annual Budget) 3. Environmental Impacts Assessment (EIA) 4. Energy Use – Diesel Use 5. Scheduled Waste Management 6. Social Impacts Assessment (SIA) 7. Stakeholders Communication and Consultations 8. Internal audit findings 9. External Audit findings 10. Continuous Improvement 11. Changes that could affect the management review. | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| | | 12. Follow up on previous management review | |
| Criterion 4.1.4 – Continual Improvement | | | |
| 4.1.4.1 | <p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p>- Major compliance -</p> | <p>The management has established the continual improvement plan that covers of the social and environmental impacts. The samples as below:</p> <ol style="list-style-type: none"> 1. Barn Owl Boxes <ul style="list-style-type: none"> - The total number of Barn Owl Boxes as at 2019 is 997 and maintain the same with ratio 1:1ha - Action plan: Schedule upkeep maintenance and repairing of the barn owl boxes. Quarterly census of boxes and populations 2. Rentice Mowing <ul style="list-style-type: none"> - Currently 95% achieved. Group & RSPO Policy & GAP for better soil moisture conservation, less erosions and potholes. - Action plan: To increase moving to 100% areas and reduce the usage of herbicides. <p>Evident part of the continuous plan that has been implemented and to maintain such as new prayer hall (surau) in 2015, new school bus, new guest workers quarters and screen traps for all compound drains.</p> | Complied |
| 4.1.4.2 | <p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p>- Major compliance -</p> | <p>The new information, techniques, technology and or innovation equipment to improve practices were obtained mainly through information from communications with Government department, suppliers and being members of associations related to palm oil industry. Any new information on new technology will be forwarded to the Estate Director and Chief Executive Director for approval before any implementation. The new information is updated to employees through morning briefings, memo, meetings, station training.</p> | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| | | Refer Budget 2024 - Capital Expenditure a. To replace 2 units Auger Conveyor - thinned and beyond economical repair. b. Infrastructure/Tarmac Road/Road Surface - from gravel road to Tarmac Road at Sungai Batu for 1.5km. c. New Alfa Laval Decanter as per budget 31/12/2023. | |
| 4.1.4.3 | An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance - | The estate has established action plan to implement new technology (where applicable) documented in the management plan such as Social Management Plan, Safety and Health Plan, Environmental Management Plan, Waste Management Plan, Water Management Plan and others. | Complied |
| 4.2 Principle 2: Transparency | | | |
| Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements | | | |
| 4.2.1.1 | The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance - | United Plantations Berhad uses the company web page (https://unitedplantations.com/sustainability/) to communicate public information relevant to sustainable practices to the stakeholders. Information on sustainability among others as listed below: i. Company commitments ii. Certifications / policies / employee iii. Environment, community The marketplace was available on the website. In addition, the management is committed in communicating adequate information to the stakeholders via session in the stakeholders meeting. Details as | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|-------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| | | shown in 4.2.2.3. Records of attendance and minutes was sighted and verified. | |
| 4.2.1.2 | <p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p> | <p>United Plantations Berhad publishes information via various means as indicated below:</p> <ul style="list-style-type: none"> i. Website www.unitedplantations.com ii. Notice boards iii. Annual report / Brochure iv. Approach to the management <p>A Policy has established on "Documents That Can Be Publicly Made Available" signed by the Chief Executive Director dated 11/01/2014 stating that the company is committed to transparency. The documents which are the publicly available on request among others as listed below:</p> <ul style="list-style-type: none"> i. Land titles/user rights ii. Occupational health and safety plans /Policies iii. Plans and impacts assessments of environment /social iv. HCV documentations v. Pollution prevention and reduction plans vi. Complaints & grievances / Negotiation procedures vii. Continual improvement plans viii. Public summary of certification assessment report | Complied |
| Criterion 4.2.2 – Transparent method of communication and consultation | | | |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| 4.2.2.1 | <p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p> | <p>United Plantations Berhad has established a procedure titled "Standard of Procedure – Stakeholder Engagement" dated 09/04/2021. Therein describing details in relation to:</p> <ul style="list-style-type: none"> i. Responsibility ii. Procedure for internal communication <ul style="list-style-type: none"> - Weekly /monthly assembly - Internal circular/memo - Notice board - MSPO meeting - Employer to employee's suggestion box - Employee's representative iii. External communication <ul style="list-style-type: none"> - Contact no of important department - Display at prominent places. <p>In addition, there was also a Grievance Redressal Procedure for consultation and communication with relevant stakeholders documented in the Handbook for Employees and Stakeholders.</p> <ul style="list-style-type: none"> i. The handbooks are handed and briefed to the workers and stakeholders during workers induction and stakeholders' consultation meetings. ii. The procedure was also available in the company website. <p>The procedure stated the steps and timeframe adapted by the management to manage issues raised by the internal and external stakeholders. The document was sighted and verified.</p> | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | |
|-------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|----|---|-------------------------------------------------------|----|-------|--------------------------------|---|----|-------------------------|---|------|-----|---|----|------------------------------------|---|------|-------|----|--------|----------|
| 4.2.2.2 | A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance - | United Plantations Berhad has appointed the Estate Director, Down River c/o UIE Estate as person responsible of MSPO as per appointment letter dated 29/03/2018 signed by the Chief Executive Director. | Complied | | | | | | | | | | | | | | | | | | | | | |
| 4.2.2.3 | List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance - | <p>All relevant stakeholders have been listed in the UIE Engineering Department Stakeholder List reviewed dated 01/05/2024 comprises of 40 people. The list of stakeholders was categorized under Government Agencies, Non-Governmental Organization (NGO), Service Providers/ Contractors/ Suppliers, Neighbouring Community/ Plantations/ Smallholders, Estate Community/ Estate/Mill Representatives. Details as listed below:</p> <table><tr><td>Classification</td><td>No</td><td>%</td></tr><tr><td>Government Agencies - MPOB/KPDNKK/PDRM/Immigration</td><td>18</td><td>45.00</td></tr><tr><td>Local Community / Smallholders</td><td>4</td><td>10</td></tr><tr><td>Suppliers / Contractors</td><td>7</td><td>17.5</td></tr><tr><td>NGO</td><td>4</td><td>10</td></tr><tr><td>Estate Communities /Representative</td><td>7</td><td>17.5</td></tr><tr><td>Total</td><td>40</td><td>100.00</td></tr></table> <p>A Stakeholder meeting was held on 23/04/2024 attended by 58 participants. The agenda discussed as follows:</p> <ul style="list-style-type: none">i. Awareness UPB Policies Briefingii. SIA briefing Risk Matrix / Joint Consultationiii. EIA Consultation / HCV / Conservation Pricesiv. Questionnaires sessions for Stakeholders <p>Issues among others highlighted were whether the individual with OKU (Orang Kurang Upaya) status be given opportunity in UPB employment</p> | Classification | No | % | Government Agencies - MPOB/KPDNKK/PDRM/Immigration | 18 | 45.00 | Local Community / Smallholders | 4 | 10 | Suppliers / Contractors | 7 | 17.5 | NGO | 4 | 10 | Estate Communities /Representative | 7 | 17.5 | Total | 40 | 100.00 | Complied |
| Classification | No | % | | | | | | | | | | | | | | | | | | | | | | |
| Government Agencies - MPOB/KPDNKK/PDRM/Immigration | 18 | 45.00 | | | | | | | | | | | | | | | | | | | | | | |
| Local Community / Smallholders | 4 | 10 | | | | | | | | | | | | | | | | | | | | | | |
| Suppliers / Contractors | 7 | 17.5 | | | | | | | | | | | | | | | | | | | | | | |
| NGO | 4 | 10 | | | | | | | | | | | | | | | | | | | | | | |
| Estate Communities /Representative | 7 | 17.5 | | | | | | | | | | | | | | | | | | | | | | |
| Total | 40 | 100.00 | | | | | | | | | | | | | | | | | | | | | | |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| | | and reply was in affirmative. There is no major issue highlighted during the meeting. | |
| Criterion 4.2.3 – Traceability | | | |
| 4.2.3.1 | The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance - | An SOP has been established titled Standard Operating Procedures - Traceability revision no 01 dated 15/02/2019. Therein describing information of: i. Person in charge is the respective Estate Manager at time of tenure. All appointments are issued by the Chief Executive Director. ii. FFB flow chart from estate harvesting designated block to mill weighbridge (tickets). iii. The mill processing records the total FFB processed for the day and the storage tank no being stored. iv. The records include opening FFB balances in ramp and cages plus the FFB intake from the estates for the day less the closing FFB balances will provide the total processed. | Complied |
| 4.2.3.2 | The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance - | United Plantations Berhad has established a Standard Operating Procedures – Traceability, rev. no. 01, dated 15/02/2019. Therein under clause 15.3 the responsibility stated that the HRSS team will conduct verification on the traceability process and ensure the accuracy of the daily and monthly records. Sessions are made in the annual internal audit latest being on 21/02/2024. | Complied |
| 4.2.3.3 | The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance - | United Plantations Berhad has appointed The Estate Director, Down River c/o UIE Estate as person responsible to implement and maintain the traceability system as per appointment letter dated 29/03/2018 signed by the Chief Executive Director. | Complied |

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| Criterion / Indicator | | Assessment Findings | | | | | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | |
|---------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|----------|--|--|------------------|---------------------------|--------------|----------------------------|----------|----------|-------|----------|----|----------|----------|-------|----------|----|----------|----------|-------|----------|----|----------|----------|-------|----------|----|----------|----------|
| 4.2.3.4 | Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance - | The FFB weighbridge ticket/despatch notes are produced for all transaction to UIE Palm Oil Mill. The set of document consists of the following information: i. Date / D/O no / Quantity / ii. Cages no / field no / iii. Stamp MSPO / RSPO certified Sustainable FFB expiry date Samples of FFB consignment to UIE Palm Oil Mill as listed below: <table><tr><td>Date</td><td>D/O</td><td>Qty/mt</td><td>Field No</td><td>Mill</td></tr><tr><td>18/01/24</td><td>75338</td><td>30 cages</td><td>1A</td><td>UIE Mill</td></tr><tr><td>18/01/24</td><td>75715</td><td>28 cages</td><td>1A</td><td>UIE Mill</td></tr><tr><td>17/07/24</td><td>63432</td><td>37 cages</td><td>2A</td><td>UIE Mill</td></tr><tr><td>17/07/24</td><td>63279</td><td>15 cages</td><td>2A</td><td>UIE Mill</td></tr></table> | | | | | Date | D/O | Qty/mt | Field No | Mill | 18/01/24 | 75338 | 30 cages | 1A | UIE Mill | 18/01/24 | 75715 | 28 cages | 1A | UIE Mill | 17/07/24 | 63432 | 37 cages | 2A | UIE Mill | 17/07/24 | 63279 | 15 cages | 2A | UIE Mill | Complied |
| Date | D/O | Qty/mt | Field No | Mill | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 18/01/24 | 75338 | 30 cages | 1A | UIE Mill | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 18/01/24 | 75715 | 28 cages | 1A | UIE Mill | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 17/07/24 | 63432 | 37 cages | 2A | UIE Mill | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 17/07/24 | 63279 | 15 cages | 2A | UIE Mill | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.3 Principle 3: Compliance to legal requirements | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criterion 4.3.1 – Regulatory requirements | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.3.1.1 | All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance - | The management has established mechanism to ensure the compliance to legal requirement. The management also ensured that all necessary licenses and permits were obtained and renewed in accordance with legal requirements, meticulously documenting these actions in the file system. Sighted the evidence: Details information on the license & permit with validity: <table><tr><td>Permit / License</td><td>Serial No & Validity Date</td></tr><tr><td>MPOB License</td><td>502076202000 31/07/2025</td></tr></table> | | | | | Permit / License | Serial No & Validity Date | MPOB License | 502076202000 31/07/2025 | Complied | | | | | | | | | | | | | | | | | | | | | |
| Permit / License | Serial No & Validity Date | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| MPOB License | 502076202000 31/07/2025 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | MPOB License (Nursery) | 622235011000 30/11/2024 | | | | | | | |
| | | Diesel Permit | A003302 24/08/2024 | | | | | | | |
| 4.3.1.2 | The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance - | The management has established the list of legal register. It was observed the list are updated when any new amendment or any new regulation. The list is listed the Act, Regulation, and Industrial code of practice. List of Legal Register being updated for their reference. Sighted the evidence: Details information on List of Legal Register: <table><tr><td>Document</td><td>Legal Requirement Register</td></tr><tr><td>Date Review</td><td>11/03/2024</td></tr></table> | | Document | Legal Requirement Register | Date Review | 11/03/2024 | Complied | | |
| Document | Legal Requirement Register | | | | | | | | | |
| Date Review | 11/03/2024 | | | | | | | | | |
| 4.3.1.3 | The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance - | The management has established the list of legal register. It was observed the list are updated when any new amendment or any new regulation. The list is listed the Act, Regulation, and Industrial code of practice. List of Legal Register being updated for their reference. Sighted the evidence: Details information on List of Legal Register: <table><tr><td>Document</td><td>Legal Requirement Register</td></tr><tr><td>Date Review</td><td>11/03/2024</td></tr><tr><td>Status</td><td>Updated</td></tr></table> | | Document | Legal Requirement Register | Date Review | 11/03/2024 | Status | Updated | Complied |
| Document | Legal Requirement Register | | | | | | | | | |
| Date Review | 11/03/2024 | | | | | | | | | |
| Status | Updated | | | | | | | | | |
| 4.3.1.4 | The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance - | Legal compliance requirements, tasked with the responsibilities of monitoring and keeping permits and licenses up to date, as well as staying informed about any changes in laws and regulations. Sighted the evidence: Details information on the appointment letter of PIC Legal: <table><tr><td>Document</td><td>Appointment Letter PIC</td></tr><tr><td>Date Review</td><td>29/03/2018</td></tr></table> | | Document | Appointment Letter PIC | Date Review | 29/03/2018 | Complied | | |
| Document | Appointment Letter PIC | | | | | | | | | |
| Date Review | 29/03/2018 | | | | | | | | | |

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| | | PIC Name | Mr. Geoffrey Cooper | | | | | | | | | | | |
| Criterion 4.3.2 – Lands use rights | | | | | | | | | | | | | | |
| 4.3.2.1 | The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance - | The management has ensured the estate operation activities do not diminish the land use rights of other users. No issues of land dispute issue occurred that involved other land user rights. | | Complied | | | | | | | | | | |
| 4.3.2.2 | The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance - | <div>The management has provided evidence of the company’s legal ownership of the estate land. Verified that land title. The copies of land titles were available. Sighted the evidence: Details information on the land title:<table><tr><td>Land Title 1</td><td>Lot No: PT 1xxx7 Size: 2316 Ha Category: Agriculture Land Status: Oil Palm</td></tr><tr><td>Land Title 2</td><td>Lot No: Lot 1xxx5 Size: 121 Ha Category: Agriculture Land Status: Oil Palm</td></tr><tr><td>Land Title 3</td><td>Lot No: PT 1xxx6 Size: 3845 Ha Category: Agriculture Land Status: Oil Palm</td></tr><tr><td>Land Title 4</td><td>Lot No: Lot 1xxx3 Size: 142.8 Ha Category: Agriculture Land Status: Oil Palm</td></tr><tr><td>Land Title 5</td><td>Lot No: PT 1xx3 Size: 39.46 Ha</td></tr></table></div> | | Land Title 1 | Lot No: PT 1xxx7 Size: 2316 Ha Category: Agriculture Land Status: Oil Palm | Land Title 2 | Lot No: Lot 1xxx5 Size: 121 Ha Category: Agriculture Land Status: Oil Palm | Land Title 3 | Lot No: PT 1xxx6 Size: 3845 Ha Category: Agriculture Land Status: Oil Palm | Land Title 4 | Lot No: Lot 1xxx3 Size: 142.8 Ha Category: Agriculture Land Status: Oil Palm | Land Title 5 | Lot No: PT 1xx3 Size: 39.46 Ha | Complied |
| Land Title 1 | Lot No: PT 1xxx7 Size: 2316 Ha Category: Agriculture Land Status: Oil Palm | | | | | | | | | | | | | |
| Land Title 2 | Lot No: Lot 1xxx5 Size: 121 Ha Category: Agriculture Land Status: Oil Palm | | | | | | | | | | | | | |
| Land Title 3 | Lot No: PT 1xxx6 Size: 3845 Ha Category: Agriculture Land Status: Oil Palm | | | | | | | | | | | | | |
| Land Title 4 | Lot No: Lot 1xxx3 Size: 142.8 Ha Category: Agriculture Land Status: Oil Palm | | | | | | | | | | | | | |
| Land Title 5 | Lot No: PT 1xx3 Size: 39.46 Ha | | | | | | | | | | | | | |

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| | | | Category: Agriculture Land Status: Oil Palm | |
| | | Land Title 6 | Lot No: PT 1xx2 Size: 3895 Ha Category: Agriculture Land Status: Oil Palm | |
| | | Land Title 7 | Lot No: Lot 1xx9 Size: 3.2451 Ha Category: Agriculture Land Status: Oil Palm | |
| | | Land Title 8 | Lot No: Lot 1xx8 Size: 6.6975 Ha Category: Agriculture Land Status: Oil Palm | |
| 4.3.2.3 | Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance - | The management has established the boundary map and during audit it was found that the boundary stone in the estate. The boundary stone are maintained and visible on the ground. Sighted the evidence: Details information on the boundary stone: | | Complied |
| | | Boundary Stone 1 | Latitude: 4' 26' 21" N Longitude: 100' 41' 5" E Block: 77/80 | |
| | | Boundary Stone 2 | Latitude: 4' 26' 25" N Longitude: 100' 38' 7" E Block: 67 | |
| 4.3.2.4 | Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall | No issues of land dispute issue occur in the mill as well as all estates that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted onsite confirmed the information. | | Not Applicable |

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| | be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance - | | |
| Criterion 4.3.3 – Customary rights | | | |
| 4.3.3.1 | Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance - | There is no evidence that the land on which the estate is situated is encumbered by customary rights. | Not Applicable |
| 4.3.3.2 | Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. - Minor compliance - | There is no evidence that the land on which the estate is situated is encumbered by customary rights. | Not Applicable |
| 4.3.3.3 | Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance - | There is no evidence that the land on which the estate is situated is encumbered by customary rights. | Not Applicable |
| 4.4 Principle 4: Social responsibility, health, safety and employment condition | | | |
| Criterion 4.4.1: Social Impact Assessment (SIA) | | | |
| 4.4.1.1 | Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance - | The management has established the Social Impact Assessment (SIA) 2024 that covered the following topics and the latest review for UIE Estate was 23/05/2024: 1. Access and use rights 2. Economic livelihoods and working conditions 3. Subsistence activities/amenities | Complied |

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| | | <p>4. Human rights</p> <p>5. Cultural and religious values</p> <p>6. Medical & health facilities</p> <p>7. Operational Activities: Nursery, Replanting, Weeding and P&D Management, Pruning, Circle Sanitation, EFB Mulching, Water Management, Road/Paths/Railways, Manuring, Harvesting, Mill Drain Connecting to Estate, Composting Pit and Linesite Water Discharge</p> <p>Part of the negative impacts being assessed with appropriate action plan and low or medium significance such as:</p> <ol style="list-style-type: none"> 1. Conflicts with stakeholder over boundary 2. Non-conformance to land title (if there is any land dispute cases) 3. Smallholders/outsideers passing through estate 4. Contract 5. Turnover of guest worker 6. Permit and passport 7. Suicide cases <p>The latest Social and Environmental Impact Assessment (SEIA) for Internal Stakeholder where a survey and study had been carried out on 10/06/2024 on 102 respondents which were randomly picked from the employees in United International Enterprise (UIE) Complex. The purpose of this study is to measure and to understand both positive and negative social impacts of the estate operations towards the workplace. The social impact study will be reviewed annually during management review.</p> | |

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| | | <p>The graphical representation based on workers categories based on:</p> <ol style="list-style-type: none"> 1. Gender: 6% female and 94% male 2. Nationality: 32% Indian, 17% Indonesia, 43% Bangladeshi, 1% Nepali and 7% Malaysian. <p>The sets questionnaires which are divided into:</p> <ol style="list-style-type: none"> 1. Housing and Amenities <ul style="list-style-type: none"> - Positive impact – utilities provided, management response towards housing and amenities issue, road conditions, awareness on road maintenance. 2. Occupational Safety and Health <ul style="list-style-type: none"> - Positive impact – PPE, work safety, equipment provided, medical facilities, awareness on SOCSO, Covid 19 preventive. 3. Environmental Pollution <ul style="list-style-type: none"> - Positive impact – pollution caused by operations, effect of sound from operation, domestic waste collection and disposal, quality of waterways, smells and strong odours from operations, environmental impact, awareness on management climate change initiatives, 4. Religious and Educational Amenities <ul style="list-style-type: none"> - Positive impact – religious amenities, school going children 5. Code of conduct <ul style="list-style-type: none"> - Positive impact - awareness on compliance to the Malaysian anti-corruption MACC Act 6. Other | |

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| | | <ul style="list-style-type: none"> - Positive impact - awareness on company sustainability policies. <p>Latest Social and Environment Impact Assessment (SEIA) for External Stakeholders where a survey and study has been carried out on 23/04/2024 during Stakeholder Consultation on 6 respondents who responded to the questionnaire provided by United Plantations Berhad. The purpose of this study is to measure and to understand both positive and negative social impacts of the estate operations towards the surrounding stakeholders.</p> <p>The graphical representation based on workers categories based on:</p> <ol style="list-style-type: none"> 1. Gender: 22% female and 78% male 2. Stakeholder: 11% NGO, 56% Government Agencies, and 33% Contractor/Supplier. <p>The sets questionnaires which are divided into:</p> <ol style="list-style-type: none"> 1. Preventive measures for C19 <ul style="list-style-type: none"> - Positive impact – suggestions/requests/ complaints based on UP's operations 2. Environmental pollution <ul style="list-style-type: none"> - Positive impact – environmental impacts caused by Estate and Mill operations 3. Religious and educations 4. Code of conduct 5. Human rights <ul style="list-style-type: none"> - Positive impact - awareness on mgt initiatives in human rights 6. Other | |

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| | | <ul style="list-style-type: none"> - Positive impact - environmental impacts caused by estates and or mill operations <p>Based on the conclusion, there were positive and negative impacts highlighted according to the responses received. The management will endeavour to resolve any negative impacts. The social impact study will be reviewed annually during management review.</p> | |
| Criterion 4.4.2: Complaints and grievances | | | |
| 4.4.2.1 | <p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p> | <p>The management has established the Grievance Redressal Procedure for Internal and External Stakeholder. The company Secretary of United Plantations Berhad will be responsible for the handling enquires and grievances against the Company. The stakeholder may lodge any enquires/grievances to the respective Estate or Palm Oil Mill Manager or direct to the Company Secretary.</p> | Complied |
| 4.4.2.2 | <p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p>- Major compliance -</p> | <p>The system to resolve the disputes or grievances has been outline in the Grievance Redressal Procedure and the summary as below:</p> <p>1. Internal Stakeholder</p> <ul style="list-style-type: none"> - Step 1 – within 7 working days of a grievance arising, the employee concerned shall raise the grievance with supervisory staff and shall be given opportunity to be accompanied by not more than two members of the NUPW estate or mill committee/ Foreign Worker Welfare Committee/employee itself. - Step 2 – If not settled within a further 7 working days, the NUPW estate or mill committee shall make formal representation to the estate or mill in writing. On receipt on NUPW'S letter, the estate or mill, will offer arrangement for a | Complied |

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| | <p>meeting between management representative and NUPW representatives not more than two members. The meeting shall be held within 7 working days of letter received.</p> <ul style="list-style-type: none"> - Step 3 – If remains unsettled, the grievance shall then be discussed between the management & representative and NUPW representative and employee himself within a further period of 10 working days. - Step 4 – If the matter still remains unsettled, is shall then be dealt with under the provision of the Industrial Relations Act, 1976 or the Employment Act, 1955. <p>2. External Stakeholder</p> <ul style="list-style-type: none"> - Grievance received from stakeholder by the estate or mill management/head of department/company secretary, - Then, the grievance formally recorded and settled as soon as possible, - Then, if the matter remains unsettled at the estate or mill level, the estate or mill manager to forward to the company secretary, - Then, grievance acknowledge by letter within 7 working days to stakeholder and estate or mill manager, - Then, grievance presented to United Plantations Berhad Executive Committee to be reviewed, - Then, action taken to be taken is recorded and stakeholder informed, - Then, progress reviewed by United Plantations Berhad Executive until resolution, | |

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| | | <ul style="list-style-type: none"> - Then, outcome of the resolution is documented, and the stakeholder informed officially by company secretary, - Should the outcome not be resolved to mutual satisfaction of the stakeholder and United Plantations Berhad, it shall be dealt under the provisions of the Malaysian Legal Appeals Procedure and stakeholder informed accordingly. <p>The procedure was documented in the Handbook for Employees and Stakeholders. Evident also the slide presentation briefed to employees on the flow of the Grievance procedure (report to mandore>field supervisor>clerk>assistant manager>manager>HRSS>EXCOM>Labour Department) and telephone number for guest or foreign worker under HRSS:</p> <ol style="list-style-type: none"> 1. Bangladesh - +6013-8334101 2. India - +6019-2573699 3. Indonesia - +6013-8684101 <p>Reviewed the Stakeholder Log Records for UIE (M) Sdn Bhd and the evident of the action taken was sampled as below:</p> <ol style="list-style-type: none"> 1. External Stakeholder: <ul style="list-style-type: none"> - Invitation from Sg Wxxxi/Sxxxxana Estate to attend Stakeholder Consultation scheduled on 20/06/2024 that has been received on 10/06/2024. The management approved to send representative from UIE (M) Berhad. - Invitation letter dated 26/02/2024 from Police Station Manjung to attend invitation to the opening and closing ceremony of the Perak KP Hero Cup Football Tournament 2024 | |

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| | | <p>planned on 01/03/2024 at 'Stadium Majlis Perbandaran Manjung' (MPM). The management has replied to the letter on 27/02/2024.</p> <ul style="list-style-type: none"> - Request from Mxxxxs Anxxxxtan Txxxxra Malaysia on 19/01/2024 to use estate building/area for the purpose of carrying out the operation. The request has been approved on 27/02/2024. <p>2. Internal Stakeholder</p> <ul style="list-style-type: none"> - Request from UIE Palm Oil Mill worker to use the company's transport for daughter schooling on 30/03/2024 has been approved on the same day by the Senior Manager, Estate 1. - Request dated 16/12/2022 from UIE Palm Oil Mill staff for mill to provide transport from January 2023 to March 2023 for her son. The approval has been given on 21/12/2022 and acknowledged by the staff on the same day. - Request from House No.: SQ32 at UIE Palm Oil Mill on 02/01/2024 to change 3 points bulb and to check the point power. The repaired has been conducted on the same day and acknowledged by the occupant. | |
| 4.4.2.3 | <p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p>- Minor compliance -</p> | <p>The stakeholder's logbook form is made available in the office. The workers or stakeholders may request the form from the office personnel when needed. In case the complainant would want to make an anonymity, they can email to the company secretary. This information is available in United Plantations Berhad website and suggestion box in the office.</p> | Complied |

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| 4.4.2.4 | Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance - | The Grievance Redressal Procedure for consultation and communication with relevant stakeholders was documented in the Handbook for Employees and Stakeholders. 1. The handbooks are handed and briefed to the workers and stakeholders during workers induction and stakeholders' consultation meetings. 2. The procedure was also available in the company website. The company policies, RSPO and MSPO certification requirements have been communicated to all stakeholders as stated in the minutes meeting Stakeholders Dialogue Session with United Plantations Berhad dated 23/05/2024. Evident the training record on policies to all workers such as Human Rights, Gender, Guest Workers/Foreign Workers, HCV Awareness, Whistleblower, CSR, publicly available documents, RSPO, MSPO, OSH and Biodiversity and Environment Policy during Muster Ground dated: 1. UIE Estate (Estate 2) – 19/01/2024 2. UIE POM – 06/01/2024 | | Complied | | |
| 4.4.2.5 | Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance - | Evident the complaint recorded as per 4.2.2.2 for the past 24 months in stakeholder's logbook, government visit logbook and communication letter of request were available during audit. | | Complied | | |
| Criterion 4.4.3: Commitment to contribute to local sustainable development | | | | | | |
| 4.4.3.1 | Growers should contribute to local development in consultation with the local communities. - Minor compliance - | Evident the Social Commitment of the Group for the year 2023 in the Annual Report: <table><tr><td>Contributions 2023</td><td>(RM)</td></tr></table> | | Contributions 2023 | (RM) | Complied |
| Contributions 2023 | (RM) | | | | | |

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| | | Hospital & Medicine for Employees, Dependents & Nearby Communities | 4,371,488 | |
| | | Education Benevolent Fund * | 1,025,283 | |
| | | Education, Welfare, Scholarships & Other | 280,754 | |
| | | Bus Subsidy for School Children | 211,065 | |
| | | External Donations | 748,563 | |
| | | New Infrastructure-Road, TNB and water supply for domestic use | 289,462 | |
| | | Employee Housing | 7,793,775 | |
| | | Infrastructure Projects, Buildings, Community Halls, Places of Worship | 2,309,937 | |
| | | Provision of Social Amenities | 5,463,124 | |
| | | Total | 22,493,451 | |
| | | The above payments are in addition to the regulatory contributions by the Group to the Employees' Provident Fund, Social Security Contributions, and other benefits. Also sighted the request for contributions as below: 1. Request from 'Kelab Guru dan Kakitangan' (KGKT), Sekolah Kebangsaan Gelong Gajah dated 31/07/2024 to apply for donations or allocations for the Independence Month and Malaysia Day 2023 Celebration Programme. The mill management has approved to donate RM100 on 04/08/2024 and acknowledged by the school 23/08/2024. 2. Invitation letter dated 26/02/2024 from Police Station Manjung to attend invitation to the opening and closing ceremony of the Perak KP Hero Cup Football Tournament 2024 planned on 01/03/2024 at 'Stadium Majlis Perbandaran Manjung' (MPM) and request for donation. The management has replied to the letter and approved | | |

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| | | to donate RM300 on 27/02/2024 and has been acknowledged on 06/03/2024. | | | | | | | | | | | | | |
| Criterion 4.4.4: Employees safety and health | | | | | | | | | | | | | | | |
| 4.4.4.1 | An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance - | <p>The management has established an occupational safety and health policy. The policy has effectively communicated and implemented. Sighted the policy has display at notice board to give information to all employee and stakeholder. Sighted the evidence:</p> <p>Details information on the OSH Policy:</p> <table><tr><td>Document</td><td>Occupational Safety & Health Policy</td></tr><tr><td>Date</td><td>08/03/2021</td></tr><tr><td>Signed By</td><td>Chief Executive Officer</td></tr></table> <p>The management also has done training on safety policy through morning master briefing and training section. Sighted the evidence:</p> <table><tr><td>Document</td><td>Training Record</td></tr><tr><td>Date</td><td>19/01/2024</td></tr><tr><td>Venue</td><td>Muster ground</td></tr></table> | Document | Occupational Safety & Health Policy | Date | 08/03/2021 | Signed By | Chief Executive Officer | Document | Training Record | Date | 19/01/2024 | Venue | Muster ground | Complied |
| Document | Occupational Safety & Health Policy | | | | | | | | | | | | | | |
| Date | 08/03/2021 | | | | | | | | | | | | | | |
| Signed By | Chief Executive Officer | | | | | | | | | | | | | | |
| Document | Training Record | | | | | | | | | | | | | | |
| Date | 19/01/2024 | | | | | | | | | | | | | | |
| Venue | Muster ground | | | | | | | | | | | | | | |
| 4.4.4.2 | The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices | <p>a) The management has established an occupational safety and health policy. The policy has effectively communicated and implemented. Sighted the policy has display at notice board to give information to all employee and stakeholder. Sighted the evidence:</p> <table><tr><td>Document</td><td>Occupational Safety & Health Policy</td></tr><tr><td>Date</td><td>08/03/2021</td></tr><tr><td>Signed By</td><td>Chief Executive Officer</td></tr><tr><td>Training Policy</td><td>19/01/2024</td></tr></table> | Document | Occupational Safety & Health Policy | Date | 08/03/2021 | Signed By | Chief Executive Officer | Training Policy | 19/01/2024 | Complied | | | | |
| Document | Occupational Safety & Health Policy | | | | | | | | | | | | | | |
| Date | 08/03/2021 | | | | | | | | | | | | | | |
| Signed By | Chief Executive Officer | | | | | | | | | | | | | | |
| Training Policy | 19/01/2024 | | | | | | | | | | | | | | |

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| | <p>ii. all precautions attached to products shall be properly observed and applied</p> <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> | <p>b) The management has established the risk for the operation. All the risk assessment has documented and monitored. Sighted the evidence:</p> <table><tr><th>Assessment</th><th>Description</th></tr><tr><td>HIRARC</td><td>HIRARC has established on 01/01/2023 and it was documented. Latest review will be on 31/12/2025. The HIRARC was done assessment to all station in the estate such as operation area, store and facilities area. All type of hazard was identified, and risk control are measured.</td></tr><tr><td>CHRA</td><td>CHRA Report (Chemical Health Risk Assessment) has been established by certified assessor with reference HQ/13/ASS/00/316 and dated 10/03/2023. The assessment was done additional at 3 work unit that exposed with chemical.</td></tr><tr><td>Medical Surveillance</td><td>Medical Surveillance has been conducted for individuals exposed to chemical. The medical surveillance report, produced on 31/01/2024. The result all workers examined are fit to work.</td></tr><tr><td>NRA</td><td>Noise Risk Assessment (NRA) Report was established by certified assessor with reference HQ/17/PEB/00/00011 and dated 20/08/2020. The assessment was done in estate area and facilities.</td></tr><tr><td>Audiometric Testing</td><td>The audiometric testing was done conducted on 22/03/2024. The total of numbers is 87</td></tr></table> | Assessment | Description | HIRARC | HIRARC has established on 01/01/2023 and it was documented. Latest review will be on 31/12/2025. The HIRARC was done assessment to all station in the estate such as operation area, store and facilities area. All type of hazard was identified, and risk control are measured. | CHRA | CHRA Report (Chemical Health Risk Assessment) has been established by certified assessor with reference HQ/13/ASS/00/316 and dated 10/03/2023. The assessment was done additional at 3 work unit that exposed with chemical. | Medical Surveillance | Medical Surveillance has been conducted for individuals exposed to chemical. The medical surveillance report, produced on 31/01/2024. The result all workers examined are fit to work. | NRA | Noise Risk Assessment (NRA) Report was established by certified assessor with reference HQ/17/PEB/00/00011 and dated 20/08/2020. The assessment was done in estate area and facilities. | Audiometric Testing | The audiometric testing was done conducted on 22/03/2024. The total of numbers is 87 | |
| Assessment | Description | | | | | | | | | | | | | | |
| HIRARC | HIRARC has established on 01/01/2023 and it was documented. Latest review will be on 31/12/2025. The HIRARC was done assessment to all station in the estate such as operation area, store and facilities area. All type of hazard was identified, and risk control are measured. | | | | | | | | | | | | | | |
| CHRA | CHRA Report (Chemical Health Risk Assessment) has been established by certified assessor with reference HQ/13/ASS/00/316 and dated 10/03/2023. The assessment was done additional at 3 work unit that exposed with chemical. | | | | | | | | | | | | | | |
| Medical Surveillance | Medical Surveillance has been conducted for individuals exposed to chemical. The medical surveillance report, produced on 31/01/2024. The result all workers examined are fit to work. | | | | | | | | | | | | | | |
| NRA | Noise Risk Assessment (NRA) Report was established by certified assessor with reference HQ/17/PEB/00/00011 and dated 20/08/2020. The assessment was done in estate area and facilities. | | | | | | | | | | | | | | |
| Audiometric Testing | The audiometric testing was done conducted on 22/03/2024. The total of numbers is 87 | | | | | | | | | | | | | | |

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| | i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite. | | workers sending for the testing. From the report, it summary result Hearing Impairment (HI) is 0 person and Standard Threshold Shift (STS) is 0 person. | | | | | | | | | | | |
| | j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. | | | | | | | | | | | | | |
| | - Major compliance - | | | | | | | | | | | | | |
| | | c) The management has been established annual training for the employee and it was prepared by Internal Team. Sighted the evidence: | | | | | | | | | | | | |
| | | <table><tr><td>Training Program</td><td>Description</td></tr><tr><td>Chemical Handling Training</td><td>Done conducted: 19/06/2024</td></tr><tr><td>Manuring Training</td><td>Done conducted: 09/01/2024</td></tr><tr><td>Spraying Training</td><td>Done conducted: 19/06/2024</td></tr><tr><td>ERP Training</td><td>Done conducted: 22/05/2024</td></tr></table> | | | Training Program | Description | Chemical Handling Training | Done conducted: 19/06/2024 | Manuring Training | Done conducted: 09/01/2024 | Spraying Training | Done conducted: 19/06/2024 | ERP Training | Done conducted: 22/05/2024 |
| | Training Program | Description | | | | | | | | | | | | |
| | Chemical Handling Training | Done conducted: 19/06/2024 | | | | | | | | | | | | |
| | Manuring Training | Done conducted: 09/01/2024 | | | | | | | | | | | | |
| | Spraying Training | Done conducted: 19/06/2024 | | | | | | | | | | | | |
| | ERP Training | Done conducted: 22/05/2024 | | | | | | | | | | | | |
| | During site visit at chemical store, it was observed that all chemical was labeling and SDS was provided and display information to public. Sighted the evidence: | | | | | | | | | | | | | |
| | <table><tr><td>Document</td><td>Safety Data Sheet</td></tr><tr><td>Benocide</td><td>SDS Available & Display</td></tr><tr><td>Basta</td><td>SDS Available & Display</td></tr><tr><td>Antracol</td><td>SDS Available & Display</td></tr></table> | | Document | Safety Data Sheet | Benocide | SDS Available & Display | Basta | SDS Available & Display | Antracol | SDS Available & Display | | | | |
| Document | Safety Data Sheet | | | | | | | | | | | | | |
| Benocide | SDS Available & Display | | | | | | | | | | | | | |
| Basta | SDS Available & Display | | | | | | | | | | | | | |
| Antracol | SDS Available & Display | | | | | | | | | | | | | |
| | d) Management has provided appropriate PPE to workers to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). Sighted the evidence: | | | | | | | | | | | | | |
| | <table><tr><td>Document</td><td>Description</td></tr><tr><td>Employee</td><td>Spraying Worker</td></tr></table> | | Document | Description | Employee | Spraying Worker | | | | | | | | |
| Document | Description | | | | | | | | | | | | | |
| Employee | Spraying Worker | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |

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| | | <table><tr><td>PPE Received</td><td>Safety shoes, cotton gloves, earplug, safety helmet, vest.</td></tr></table> | PPE Received | Safety shoes, cotton gloves, earplug, safety helmet, vest. | | | | | | |
| PPE Received | Safety shoes, cotton gloves, earplug, safety helmet, vest. | | | | | | | | | |
| | | e) The management has established standard operating procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health | | | | | | | | |
| | | <table><tr><td>Document</td><td>OSH Manual – Section 5: handling storage chemical</td></tr><tr><td>Date</td><td>June 2023</td></tr></table> | Document | OSH Manual – Section 5: handling storage chemical | Date | June 2023 | | | | |
| Document | OSH Manual – Section 5: handling storage chemical | | | | | | | | | |
| Date | June 2023 | | | | | | | | | |
| | | f) The management has appointed responsible person(s) for safety and health. Refer appointment letter, there is information of the roles and responsibilities of the appointed officer had clearly stated in the appointment letter. Sighted the evidence: | | | | | | | | |
| | | <table><tr><td>Document</td><td>Appointment Letter PIC</td></tr><tr><td>Date</td><td>09/09/2022</td></tr><tr><td>PIC Name</td><td>Mr. Jason Joseph</td></tr></table> | Document | Appointment Letter PIC | Date | 09/09/2022 | PIC Name | Mr. Jason Joseph | | |
| Document | Appointment Letter PIC | | | | | | | | | |
| Date | 09/09/2022 | | | | | | | | | |
| PIC Name | Mr. Jason Joseph | | | | | | | | | |
| | | g) The management has conducted regular two-way communication with their employees during OSH Meeting with discussion on employee's health, safety and welfare. The safety meeting was conducted according to OSHA Requirement. Sighted the evidence: | | | | | | | | |
| | | <table><tr><td>Document</td><td>OSH Minutes Meeting</td></tr><tr><td>Date Meeting</td><td>Meeting 1: 27/03/2024 Meeting 2: 25/06/2024 Meeting 3: Plan on Sept 2024</td></tr></table> | Document | OSH Minutes Meeting | Date Meeting | Meeting 1: 27/03/2024 Meeting 2: 25/06/2024 Meeting 3: Plan on Sept 2024 | | | | |
| Document | OSH Minutes Meeting | | | | | | | | | |
| Date Meeting | Meeting 1: 27/03/2024 Meeting 2: 25/06/2024 Meeting 3: Plan on Sept 2024 | | | | | | | | | |

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| | | <p>h) The management has established accident and emergency procedures and the instructions clearly understood by all employees. Sighted document as below evidence:</p> <table><tr><td>Document</td><td>OSH Manual – Accident & Investigation Procedure</td></tr><tr><td>Date</td><td>20/02/2008</td></tr><tr><td>Training ERP to workers</td><td>Done conducted: 22/05/2024</td></tr></table> <p>i) First aider has been present at works station. The Latest training has been conducted as refer to attendance list. First aid box also was inspected during site visit and found contains with approved contents. Sighted the evidence:</p> <table><tr><td>First Aid Box (FAB)</td><td>Available at field site Available at workshop</td></tr><tr><td>Date Inspection</td><td>10/06/2024 done by Hospital Assistant (HA)</td></tr><tr><td>Observation</td><td>All the item in FAB updated.</td></tr></table> <p>j) The management has recorded and kept of all accidents, and it was reviewed periodically intervals by internal team. Sighted the evidence:</p> <table><tr><td>Document</td><td>JKKP 8 Submission</td></tr><tr><td>Date</td><td>26/01/2024</td></tr><tr><td>Reference</td><td>JKKP8/173488/2023</td></tr><tr><td>Accident</td><td>Three (3) Accident</td></tr></table> <p>The investigation was done by internal team, and it was recorded in JKKP 6. The OSH committee also discussed the investigation and method of prevention, action to be taken during OSH Meeting dated 27/03/2024.</p> | Document | OSH Manual – Accident & Investigation Procedure | Date | 20/02/2008 | Training ERP to workers | Done conducted: 22/05/2024 | First Aid Box (FAB) | Available at field site Available at workshop | Date Inspection | 10/06/2024 done by Hospital Assistant (HA) | Observation | All the item in FAB updated. | Document | JKKP 8 Submission | Date | 26/01/2024 | Reference | JKKP8/173488/2023 | Accident | Three (3) Accident | |
| Document | OSH Manual – Accident & Investigation Procedure | | | | | | | | | | | | | | | | | | | | | | |
| Date | 20/02/2008 | | | | | | | | | | | | | | | | | | | | | | |
| Training ERP to workers | Done conducted: 22/05/2024 | | | | | | | | | | | | | | | | | | | | | | |
| First Aid Box (FAB) | Available at field site Available at workshop | | | | | | | | | | | | | | | | | | | | | | |
| Date Inspection | 10/06/2024 done by Hospital Assistant (HA) | | | | | | | | | | | | | | | | | | | | | | |
| Observation | All the item in FAB updated. | | | | | | | | | | | | | | | | | | | | | | |
| Document | JKKP 8 Submission | | | | | | | | | | | | | | | | | | | | | | |
| Date | 26/01/2024 | | | | | | | | | | | | | | | | | | | | | | |
| Reference | JKKP8/173488/2023 | | | | | | | | | | | | | | | | | | | | | | |
| Accident | Three (3) Accident | | | | | | | | | | | | | | | | | | | | | | |

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| Criterion 4.4.5: Employment conditions | | | |
| 4.4.5.1 | <p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p> | <p>The management has established the Human Rights Policy signed by Chief Executive Director dated 09/03/2020.</p> <p>The United Plantations Berhad are committed to the protection and advancement of human rights including prohibiting retaliation, intimidation, and harassment against Human Rights Defenders (HRD), whistleblowers, complainants, and community spokespersons.</p> <p>The objectives are as follows:</p> <ol style="list-style-type: none"> 1. We adhere to the fundamental elements of International Labour Organization (ILO) Convention and the United Nations Declaration on Human Rights, the Rights of Indigenous Peoples and other core values as ratified by the countries in which we operate. 2. We ensure all personnel are treated fairly and protected from any form of discrimination that would constitute a violation of their human rights. 3. We ensure equal opportunities provided to all personnel. The process of recruitment, promotion and remuneration are solely based on individual qualification and performance regardless of religion, race, age, gender, nationality, or physical disability. 4. We respect the rights of all personnel to form, join and participate in registered trade unions and to bargain collectively. 5. We respect the rights of people in communities impacted by our activities. We will seek to identify adverse social and environmental impacts through their respective assessments and take appropriate steps to avoid, minimize and/or mitigate them. | Complied |

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| | | <p>6. We respect land tenure rights as well as recognize duties and responsibilities associated with tenure rights.</p> <p>7. We respect customary or native rights of indigenous and local communities, and we commit to Free, Prior and Informed Consent (FPIC) in all negotiations prior to commencing any new operations.</p> <p>8. We resolve all complaints and grievances through an open, transparent and consultative process.</p> <p>9. We will not tolerate the use of child or forced labour, slavery or human trafficking in any of our plantations and facilities. We are using the definition from United Nations Convention on the Rights of the Child which define 'child' as anyone who is less than 18 years old.</p> <p>10. We will strive to commit our employees, contractors, suppliers, trading partners, contracted security forces, associated local communities and stakeholders to adhere to this policy.</p> <p>Evident the training record on policies to all workers such as Human Rights, Gender, Guest Workers/Foreign Workers, HCV Awareness, Whistleblower, CSR, publicly available documents, RSPO, MSPO, OSH and Biodiversity and Environment Policy during Muster Ground dated:</p> <p>1. UIE Estate (Estate 2) – 19/01/2024</p> <p>2. UIE POM – 06/01/2024</p> | |
| 4.4.5.2 | <p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p> | <p>Stated in the Human Rights Policy objectives:</p> <p>1. We ensure all personnel are treated fairly and protected from any form of discrimination that would constitute a violation of their human rights.</p> <p>2. We ensure equal opportunities provided to all personnel. The process of recruitment, promotion and remuneration are solely</p> | Complied |

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| | | based on individual qualification and performance regardless of religion, race, age, gender, nationality or physical disability. 3. We respect the rights of all personnel to form, join and participate in registered trade unions and to bargain collectively. Based on document review and interview with sampled employees there is no discrimination actions by the management in terms of race, colour, sex, religion, political opinion, nationality, social origin, or any other distinguishing characteristics. All employees satisfied with fair treatment by the management. | | | | | | | | | | | | | | | | | | | | |
| 4.4.5.3 | Management shall ensure that employees’ pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance - | The management have paid their employees equally based on agreed Collective Agreement. The documentation of pay and conditions of samples employees and contractor workers are available and meet the applicable laws such as Minimum Wages Order and Employment Act 1955. The contractor will submit the copy of their worker’s payslip for estates and mills reference. Sighted the samples of employment contracts, pay slips for the month of February 2024, April 2024 and May 2024, identification card, passport, permit, EPF and SOCSO employer contributions, overtime details, medical leaves and annual leaves from different nationalities, races, and genders of: <table><tr><td>Employee No</td><td>Nationality</td><td>Type of work</td><td>Gender</td><td>Passport/ Visa Validity</td></tr><tr><td>810027</td><td>Indonesian</td><td>Loose Fruit Collector</td><td>Female</td><td>P:27/03/2027 V:08/04/2025</td></tr><tr><td>407940</td><td>Malaysian (Indian)</td><td>Bus Conductor</td><td>Female</td><td></td></tr></table> | | | | | Employee No | Nationality | Type of work | Gender | Passport/ Visa Validity | 810027 | Indonesian | Loose Fruit Collector | Female | P:27/03/2027 V:08/04/2025 | 407940 | Malaysian (Indian) | Bus Conductor | Female | | Complied |
| Employee No | Nationality | Type of work | Gender | Passport/ Visa Validity | | | | | | | | | | | | | | | | | | |
| 810027 | Indonesian | Loose Fruit Collector | Female | P:27/03/2027 V:08/04/2025 | | | | | | | | | | | | | | | | | | |
| 407940 | Malaysian (Indian) | Bus Conductor | Female | | | | | | | | | | | | | | | | | | | |

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| | | 208857 | Malaysian (Malay) | Office Cleaner | Female | | |
| | | 810127 (Intake June '23) | Indonesian | Loose Fruit Collector | Male | P:29/03/2033 V:26/06/2025 | |
| | | 124508 | Indonesian | Cutter | Male | P:20/09/2033 V:18/07/2024 | |
| | | 208589 | Bangladeshi | Watchman | Male | P:23/06/2026 V:15/05/2025 | |
| | | 810265 (Intake May 2024) | Bangladeshi | Loose Fruit Collector | Male | P:18/11/2033 V: In-progress | |
| | | 123145 | Indian | Driver | Male | P:06/11/2027 V:13/01/2025 | |
| | | 312169 | Indian | Upkeep & Road | Male | P:24/03/2025 V:27/10/2024 | |
| | | 119685 | Bangladeshi | Misc. Field Worker | Male | P:21/06/2027 V:24/07/2025 | |
| | | 118820 | Indian | Manuring | Male | V:02/11/2024 | |
| | | 810050 | Indonesian | Cutter | Male | P:23/09/2027 V:11/11/2024 | |
| | | 211507 | Indonesian | Gardener | Female | P:27/03/2027 V:10/04/2025 | |
| | | 110684 | Malaysian (Malay) | Auxiliary Police | Male | | |
| | | 124898 | Malaysian (Indian) | Driver | Male | | |
| | | During document review and interview with the sample's worker, there is no evident that the recruitment fees has been charged to quest or | | | | | |

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| | | <p>foreign workers as the company applied the workers via Guest Worker Recommend Guest Worker program or Accredited Recruiting Agent or government to government program. All the workers satisfied with the salary payment, overtime, allowances, and deductions.</p> <p>Sighted the approval for salary deductions under Sect 24 of Employment Act 1955 for United Plantations Berhad dated 01/06/2012 (Ref: (6) dlm BHG PU/9/129) from the Labour Department. Stated that the deduction must not more than 50% from the monthly basic or 75% is there is any housing loan included and other requirements.</p> | |
| 4.4.5.4 | <p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p> | <p>The documentation of pay and conditions of samples employees and contractor workers are available and meet the applicable laws such as Minimum Wages Order and Employment Act 1955. The contractor will submit the copy of their worker's payslip and employment documents for estates and mills reference.</p> <p>Evident the contractor agreement between United Plantations Berhad: K Kxxxr Excxxxxor – The contractor agrees to provide excavator(s) including operator to carry out various work which will be directed by the Estate from time to time. The Rates of Contract Value stated in the agreement for Hiring of Excavator and Drain Works. All extra operations not included in the agreement will be carried out at the same rate and standards as required by United Plantations Berhad. The agreement signed and delivered by Deputy Group Manager and K Kxxxr Excxxxxor. The agreement is valid from 1/1/2024 to 31/12/2024 unless terminated earlier under Clause 8.</p> <p>Stated in the agreement, Clause (11): The contractor shall adhere to the attached UP's Company Policies as follow which are required under MSPO and RSPO certifications such as Human Rights Policy (e.g.: no child labor and trafficked labor and equal treatment), OSH policy,</p> | Complied |

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| | | <p>gender policy, valid employment contract for contractor workers, minimum wages order, etc.</p> <p>There is no worker has been hired under the contractor and he is the only driver. The management has established pricing mechanism and conducted as per contract agreement with contractor.</p> <p>Review on the contract agreement, sighted pricing of the job task is available. Payment terms for contract work were stated in the contract agreement as stated in 4.6.3.1.</p> <p>Also stated in the agreement:</p> <p>All payment to the Contractor will be made by 7th of the current month based on all satisfactory work completed in the previous month, the rates of the payment should be as per attached document in the agreement.</p> <p>Evident the listing of work done by K Kxxxr Excxxxxor for the month ended May 2024 and certificate of payment dated 31/05/2024, CP No:62240222 and MOA No:09326. The recommended or certified for payment have been made on 02/06/2024.</p> <p>Onsite consultation with contractors informed their payments were made as per payment terms stated in the contracts. No delayed of payments recorded.</p> | |
| 4.4.5.5 | <p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p> | <p>The management registered all their workers into Employee Master Details List.</p> <p>Review on the listing included workers' personal details such as full name, gender, date of birth, date join company, race, designation, and wages were available.</p> | Complied |

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| <p>4.4.5.6 All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p> | <p>The management has established employment contract for all workers and contractors' workers. All the terms and conditions stated in the employment agreement were as per Labour Act 1955, latest MAPA/NUPW Agreement and Minimum Wage Order 2022 (amendment). Among the clause spell out in the contracts includes:</p> <ol style="list-style-type: none"> 1. Duration of the Contract of Employment 2. Wages 3. Working Hours 4. Rest Day 5. Public Holiday 6. Annual Leave/Vacation Leave 7. Levy 8. Medical and SOCSO Employment Injury Scheme 9. Deductions 10. Accommodation, Amenities and Transportation 11. Sick Leave 12. Renewal of Employee's work permit 13. Air Passage 14. Repatriation 15. Termination 16. Restriction and Termination of Service 17. Safekeeping of the Passport 18. Outstanding Wages 19. Medical Examination | <p>Complied</p> |

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| | | 20. Tools 21. Deceased Employee 22. Grievance Redressal Procedure 23. Unresolved Disputes 24. Induction Course 25. Time is an Essence 26. Interpretation 27. Understanding of job type 28. Succession Also evident, the employment contract of the samples contractor workers that comprises the name, identification number, dates, salary, working day, working hour, termination of service, leaves, rules, and regulations. The employment contract was prepared in various languages based on the nationality such as Bahasa Malaysia, English, Tamil, Bengali and Nepali for better understanding. All the workers get the copy of their employment contract. | |
| 4.4.5.7 | The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. - Major compliance - | All the daily attendance and overtime work were recorded in the Daily attendance record and payroll system. Onsite interview and document review with sampled workers (as listed in 4.4.5.3) informed working time and break time is according to employment contract. Overtime offered to workers is voluntarily upon mutually agreement between management and workers including compliance by contractor as per their Letter of Award. | Complied |
| 4.4.5.8 | The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations | All the daily attendance and overtime work were recorded in the Daily attendance record and payroll system. Onsite interview and document | Complied |

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| | and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance - | review with sampled workers (as listed in 4.4.5.3) informed working time and break time is according to employment contract. Overtime offered to workers is voluntarily upon mutually agreement between management and workers including compliance by contractor as per their Letter of Award. | |
| 4.4.5.9 | Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance - | The documentation of pay and conditions of samples employees and contractor workers are available and meet the applicable laws such as Minimum Wages Order and Employment Act 1955. All the daily attendance and overtime work were recorded in the Daily attendance record and payroll system. Onsite interview and document review with sampled workers (as listed in 4.4.5.3) informed working time and break time is according to employment contract. Overtime offered to workers is voluntarily upon mutually agreement between management and workers including compliance by contractor as per their Letter of Award. During document review and interview with the sample's worker, all the workers satisfied with the salary payment, overtime, allowances, and deductions. | Complied |
| 4.4.5.10 | Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - Minor compliance - | The employees working as general, field worker, oil palm harvester and related collections operation are paid under the current MAPA and NUPW and additional payment such as Fringe Benefits, Special Gratuitous Payment (SGP) and Productivity Incentive. All workers are provided with free medical facilities located in estate, free housing facilities were provided to all the workers and their families including subsidised electricity and water (50gallons), mosque, temples, hall, playground, creche, school bus, allowances, bonuses, etc. The MAPA/NUPW collective agreement provides provisions for Price Bonus, which will partly defray the cost of food. The company | Complied |

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| | | also provides cooking oil & rice at a wholesale cost and transportation to the place of work and return. | |
| 4.4.5.11 | In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. - Major compliance - | <p>Stated in the employment contract under Accommodation, Amenities and Transportation that:</p> <p>The company shall provide free accommodation for the duration of The Employee's term of service with The Company. Each house or unit shall be shared by 6 employees (3 bedroom) and by 4 employees (2 bedroom).</p> <p>All workers are provided with free medical facilities located in estate, free housing facilities were provided to all the workers and their families including subsidised electricity and water (50gallons), mosque, temples, hall, playground, creche, school bus, allowances, bonuses, etc as sighted during the site visit. The houses are in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) in term of size and number occupant.</p> | Complied |
| 4.4.5.12 | The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance - | <p>The management has established the Gender Policy signed by Chief Executive Director dated 24/04/2015.</p> <p>The United Plantations Berhad are committed to maintaining a workplace free from harassment of any kind, including harassment based on an employee's race, colour, religion, gender, national origin, ancestry, disability, marital status and sexual orientation. In line with the policy, we shall:</p> <ol style="list-style-type: none"> 1. Endeavour to prevent sexual harassment and all other forms of violence against women and workers in the workplace or in the course of an employee's work. 2. Adopt a specific complaints and grievance procedure and mechanism to address gender-based issues. | Complied |

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| | | <p>3. Encourage effective participation of women in decision-making by their representation as members of various committees, such as the Occupational Safety and Health Committee.</p> <p>4. Establish a Gender Committee to implement and monitor the policy.</p> <p>5. To protect the Reproductive Rights and Motherhood responsibilities of women as under the Universal Declaration of Human Rights and labour laws.</p> <p>6. We will communicate to our employees, contractors, and suppliers to adhere to the values of this policy.</p> <p>The management also has established the Grievance and redressal for sexual harassment in the workplace in accordance with United Plantations Berhad sexual harassment & violence policy. Evident the Misconduct Report Form (Sexual Harassment & Violence).</p> <p>Any worker who has grievance related to sexual harassment or violence nature can obtain the complaint form from one of the sub-committee members in respective Estates/Departments and either complete it herself or request the assistance of the sub-committee member to fill it up. The complaint form is to be submitted to the respective Head of Department and copied to the Gender Committee.</p> <p>The management has established Gender Committee and centralized for UIE Palm Oil Mill and UIE Estate. The latest meeting has been conducted on 23/04/2024 at UIE Committee Hall attended by 20 members comprises of chairperson, secretary and female members from account department, telephone operator, plantation stores, workshop, mill office, engineering/mill stores, sundry gang (estate), Estate 2 and research.</p> <p>The agenda of the meeting are as follows:</p> | |

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| | | <ol style="list-style-type: none"> 1. Briefing on UP's Gender Policy 2. Briefing on the UP's Grievance Procedure on sexual harassment and domestic/workplace violence 3. Discussion on women specific topics 4. New Mother Assessment 5. Briefing on the rights and needs of new mother (pre-and post-delivery) 6. Summary of sexual harassment and domestic/workplace violence 7. Gathering feedback and input 8. Others (domestic/workplace related issues) <p>Based on the minutes there is no cases of sexual harassment and domestic violence has been reported since 2023 and has confirmed during consultation with the female workers and gender committee representatives.</p> | |
| 4.4.5.13 | <p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p> | <p>Stated in the Human Rights Policy objectives: We respect the rights of all personnel to form, join and participate in registered trade unions and to bargain collectively.</p> <p>The latest Guest Welfare Committee meeting titled 'Mesyuarat Kebajikan Pekerja Tetamu (Guest Worker/Foreign Workers) Ladang-Ladang UIE' for UIE POM and UIE Estate has been conducted on 15/02/2024.</p> <p>The meeting chaired by Senior Manager, attended by committee members, representative from temple, mosque, Auxiliary Police, Hospital Assistant and 20 guest worker or foreign worker representatives from each nationality such as 8 Bangladeshi, 5 Indonesians, 7 Indians, and 1 Nepalese.</p> | Complied |

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| | | <p>The agenda of the meeting:</p> <ol style="list-style-type: none"> 1. Introduction by Chairman 2. Confirmation of previous minutes meeting 3. Orientation for new worker 4. Matter Arising 5. Water Supply 6. Mosque/temple 7. Electricity 8. Safety 9. Fight Case 10. Recreational 11. Salary & Pay Slip 12. Festival Ceremony 13. Accommodation 14. Hygiene & Sanitation 15. Amenities & Facilities 16. Others <p>During the meeting, only 1 request from the worker for management to change the schedule of grass cutting on rest day to workday due to the noise of the machine disturbs the workers in the workers' housing area. The appropriate action has been taken as evident during the audit.</p> <p>Furthermore, during consultation with all the sample's workers, the workers informed that the workers representative has been nominated by them and they have freedom to join union.</p> | |

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| 4.4.5.14 | Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children and young persons is acceptable on family farms, under adult supervision, and when not interfering with their education. They shall not be exposed to hazardous working conditions. - Major compliance - | Stated in the Human Rights Policy objectives: We will not tolerate the use of child or forced labour, slavery or human trafficking in any of our plantations and facilities. We are using the definition from United Nations Convention on the Rights of the Child which define 'child' as anyone who is less than 18 years old. The management clearly not allow individual under the age of 18 years to work at the premise. As sighted in the list of workers there is no workers below 18 years old. | Complied | | | | | | | | | | | | | | | | |
| Criterion 4.4.6: Training and competency | | | | | | | | | | | | | | | | | | | |
| 4.4.6.1 | All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept. - Major compliance - | <div>The management has established a training programmed to the workers and the awareness training was done conducted to the employee from internal team. All record of training was documented. Sighted the evidence:</div> <table><tr><td>Document</td><td>Training Programmed</td></tr><tr><td>Date</td><td>Year 2024</td></tr><tr><td>Hearing Training</td><td>Done conducted: 29/04/2024</td></tr><tr><td>SOP Training</td><td>Done conducted: 06/01/2024</td></tr><tr><td>Fire Drill Training</td><td>Done conducted: 22/05/2024</td></tr><tr><td>ERP Training</td><td>Done conducted: 22/05/2024</td></tr><tr><td>PPE Training</td><td>Done conducted: 04/01/2024</td></tr><tr><td>Chemical Training</td><td>Done conducted: 19/06/2024</td></tr></table> | Document | Training Programmed | Date | Year 2024 | Hearing Training | Done conducted: 29/04/2024 | SOP Training | Done conducted: 06/01/2024 | Fire Drill Training | Done conducted: 22/05/2024 | ERP Training | Done conducted: 22/05/2024 | PPE Training | Done conducted: 04/01/2024 | Chemical Training | Done conducted: 19/06/2024 | Complied |
| Document | Training Programmed | | | | | | | | | | | | | | | | | | |
| Date | Year 2024 | | | | | | | | | | | | | | | | | | |
| Hearing Training | Done conducted: 29/04/2024 | | | | | | | | | | | | | | | | | | |
| SOP Training | Done conducted: 06/01/2024 | | | | | | | | | | | | | | | | | | |
| Fire Drill Training | Done conducted: 22/05/2024 | | | | | | | | | | | | | | | | | | |
| ERP Training | Done conducted: 22/05/2024 | | | | | | | | | | | | | | | | | | |
| PPE Training | Done conducted: 04/01/2024 | | | | | | | | | | | | | | | | | | |
| Chemical Training | Done conducted: 19/06/2024 | | | | | | | | | | | | | | | | | | |
| 4.4.6.2 | Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. | The management has established training needs of individual employees in order to provide the specific skill and competency required to all employees based on their job description. Refer training needs, there is allocation specific training module for category of employee. Sighted the evidence: | Complied | | | | | | | | | | | | | | | | |

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| | - Major compliance - | Document | Training Need Analysis | | | | | | | | | | | | | | | | | |
| | | Date | Year 2024 | | | | | | | | | | | | | | | | | |
| | | Category | Staffs and workers | | | | | | | | | | | | | | | | | |
| 4.4.6.3 | A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure. - Minor compliance - | The management has established a training programmed to the workers and the awareness training was done conducted to the employee from internal team. All record of training was documented. Sighted the evidence: <table><tr><td>Document</td><td>Training Programmed</td></tr><tr><td>Date</td><td>Year 2024</td></tr><tr><td>Hearing Training</td><td>Done conducted: 29/04/2024</td></tr><tr><td>SOP Training</td><td>Done conducted: 06/01/2024</td></tr><tr><td>Fire Drill Training</td><td>Done conducted: 22/05/2024</td></tr><tr><td>ERP Training</td><td>Done conducted: 22/05/2024</td></tr><tr><td>PPE Training</td><td>Done conducted: 04/01/2024</td></tr><tr><td>Chemical Training</td><td>Done conducted: 19/06/2024</td></tr></table> After training finished the Assessment Training was conducted to the participant purposely to know their understanding. The record was documented. | | Document | Training Programmed | Date | Year 2024 | Hearing Training | Done conducted: 29/04/2024 | SOP Training | Done conducted: 06/01/2024 | Fire Drill Training | Done conducted: 22/05/2024 | ERP Training | Done conducted: 22/05/2024 | PPE Training | Done conducted: 04/01/2024 | Chemical Training | Done conducted: 19/06/2024 | Complied |
| Document | Training Programmed | | | | | | | | | | | | | | | | | | | |
| Date | Year 2024 | | | | | | | | | | | | | | | | | | | |
| Hearing Training | Done conducted: 29/04/2024 | | | | | | | | | | | | | | | | | | | |
| SOP Training | Done conducted: 06/01/2024 | | | | | | | | | | | | | | | | | | | |
| Fire Drill Training | Done conducted: 22/05/2024 | | | | | | | | | | | | | | | | | | | |
| ERP Training | Done conducted: 22/05/2024 | | | | | | | | | | | | | | | | | | | |
| PPE Training | Done conducted: 04/01/2024 | | | | | | | | | | | | | | | | | | | |
| Chemical Training | Done conducted: 19/06/2024 | | | | | | | | | | | | | | | | | | | |
| 4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services | | | | | | | | | | | | | | | | | | | | |
| Criterion 4.5.1: Environmental Management Plan | | | | | | | | | | | | | | | | | | | | |
| 4.5.1.1 | An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance - | United Plantations Berhad has developed an Environment & Biodiversity Policy dated on 08/03/2021 endorsed by the Chief Executive Director and implemented. The policy was displayed prominently on notice boards in local language Bahasa Malaysia, Bangladeshi. Indian and English Language to accommodate the | | Complied | | | | | | | | | | | | | | | | |

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| | | <p>workers that come from different nation into the Estates. Therein among others has stated that the Company is committed to protecting the environment and conserving biodiversity through minimizing environmental harms:</p> <ul style="list-style-type: none">i. Protecting and enhancing biodiversity and the ecosystemii. No deforestation and no new development on peat soiliii. Enhancing resilience against climate change impactiv. Adopting responsible consumption and production. <p>This policy is prominently displayed in the office along with other Company's Policies. It is communicated to the employees via training and briefing session among others as follows.</p> <table><tr><th>Subject</th><th>Date</th></tr><tr><td>OSH Legal & Other requirements</td><td>19/01/2024</td></tr><tr><td>ERP Chemical spill, poisoning, Fire</td><td>22/05/2024</td></tr><tr><td>Scheduled waste management</td><td>08/01/2024</td></tr><tr><td>Policies Awareness</td><td>13/04/2024</td></tr><tr><td>HCV Training for Region</td><td>19/01/2024</td></tr><tr><td>Domestic Waste Management</td><td>22/02/2024</td></tr></table> | Subject | Date | OSH Legal & Other requirements | 19/01/2024 | ERP Chemical spill, poisoning, Fire | 22/05/2024 | Scheduled waste management | 08/01/2024 | Policies Awareness | 13/04/2024 | HCV Training for Region | 19/01/2024 | Domestic Waste Management | 22/02/2024 | |
| Subject | Date | | | | | | | | | | | | | | | | |
| OSH Legal & Other requirements | 19/01/2024 | | | | | | | | | | | | | | | | |
| ERP Chemical spill, poisoning, Fire | 22/05/2024 | | | | | | | | | | | | | | | | |
| Scheduled waste management | 08/01/2024 | | | | | | | | | | | | | | | | |
| Policies Awareness | 13/04/2024 | | | | | | | | | | | | | | | | |
| HCV Training for Region | 19/01/2024 | | | | | | | | | | | | | | | | |
| Domestic Waste Management | 22/02/2024 | | | | | | | | | | | | | | | | |
| 4.5.1.2 | <p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations.</p> <p>- Major compliance -</p> | <p>The Estates Environmental Management Plan covers the following:</p> <p>a) An environmental policy and objectives:</p> <p>The policy in relation to environmental UPB is stated in the Environment & Biodiversity Policy dated on 08/03/2021 signed by the Chief Executive Officer. The Policy among others emphasized on the environmental management objectives to include the following:</p> <ul style="list-style-type: none">i. Identification & protection of HCV And HCS forest | Complied | | | | | | | | | | | | | | |

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| | | <ul style="list-style-type: none"> ii. Implementation of program to progressively reduce GHG emission, recycle /reuse of palm biomass iii. Enforcement of no burning policy. iv. No use of paraquat and pesticides categorized by WHO class 1A or 1B. v. To identify source of GHG and calculation of GHG emission with plan /effort to minimize the emission. vi. To reduce chemical usage where feasible annually. <p>b) The aspects and impacts analysis of all operations.</p> <p>The aspects and impact for the estate were established in a similar document prepared by the HRSS Department titled "Environmental Impact Assessment – Management Action Plan and Continuous Improvement Plan 2024". The documents compilation was made for a period ranging from Jan – Dec and reviewed annually recent being dated 19/05/2024.</p> <p>Therein the content provides details relating to the following estate activities and operation listed below:</p> <ul style="list-style-type: none"> i. Waste management and reduction plan ii. Pesticide reduction plan iii. Chemical & fertilizer reduction plan. iv. Road construction and maintenance v. Implementation of Integrated Pest Management Program vi. Identification of side product and potential of GHG emission vii. Aspects and impacts identification & risk assessment matrix | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| | | viii. Environmental pollution and GHG management plan. ix. Future continuous improvement plan. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.1.3 | An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance - | <p>The developed Environmental Improvement Plan to mitigate the negative impacts and to promote the positive ones were effectively implemented and monitored. The Environmental Improvement Plan 2024 dated Jan 2024 having details of mitigation of the negative impacts. They are summarized and among others as shown below:</p> <table><tr><td>Activities</td><td>Impact</td><td>Management Plan</td></tr><tr><td>Grass cutting</td><td>Smoke emission</td><td>PPE / Maintenance</td></tr><tr><td>Grass cutting</td><td>Noise</td><td>PPE adherence</td></tr><tr><td>Rubbish disposal</td><td>Release of gas</td><td>Landfill external disposal</td></tr><tr><td>Herbicide spraying</td><td>Chemical spillage</td><td>No container leakage / PPE</td></tr><tr><td>Vehicle movement</td><td>Exhaust gas / dust</td><td>Schedule maintenance</td></tr><tr><td>Replanting felling</td><td>Soil erosion</td><td>Guidance as SOP</td></tr><tr><td>Manuring</td><td>Contamination</td><td>Guidance as SOP</td></tr><tr><td>Chemical Mixing</td><td>Spillage</td><td>Tray / Containment trap</td></tr><tr><td>Irrigation system</td><td>Depleted irrigation system</td><td>Demarcation of buffer prior to felling</td></tr><tr><td>EFB mulching</td><td>Contamination</td><td>EFB Mulching Soil compaction caused by tractor Use of low ground pressure tires or twin wheels.</td></tr></table> <p>Based on the samples taken, all environmental management plan related to the process were found to be satisfactory to mitigate the negative impacts in estates. Records of periodical reporting of each of</p> | Activities | Impact | Management Plan | Grass cutting | Smoke emission | PPE / Maintenance | Grass cutting | Noise | PPE adherence | Rubbish disposal | Release of gas | Landfill external disposal | Herbicide spraying | Chemical spillage | No container leakage / PPE | Vehicle movement | Exhaust gas / dust | Schedule maintenance | Replanting felling | Soil erosion | Guidance as SOP | Manuring | Contamination | Guidance as SOP | Chemical Mixing | Spillage | Tray / Containment trap | Irrigation system | Depleted irrigation system | Demarcation of buffer prior to felling | EFB mulching | Contamination | EFB Mulching Soil compaction caused by tractor Use of low ground pressure tires or twin wheels. | Complied |
| Activities | Impact | Management Plan | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Grass cutting | Smoke emission | PPE / Maintenance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Grass cutting | Noise | PPE adherence | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Rubbish disposal | Release of gas | Landfill external disposal | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Herbicide spraying | Chemical spillage | No container leakage / PPE | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Vehicle movement | Exhaust gas / dust | Schedule maintenance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Replanting felling | Soil erosion | Guidance as SOP | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Manuring | Contamination | Guidance as SOP | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Chemical Mixing | Spillage | Tray / Containment trap | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Irrigation system | Depleted irrigation system | Demarcation of buffer prior to felling | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EFB mulching | Contamination | EFB Mulching Soil compaction caused by tractor Use of low ground pressure tires or twin wheels. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | the above items were evident to support that the plans have been monitored. The plans were reviewed annually. | |
| 4.5.1.4 | <p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p> | <p>A program to promote the positive impact has been included in the continual improvement plan. Status, Budget and person in charge were included in the plan for monitoring the progress. This is available as elaborated in indicator 4.5.1.3 above. Improvement planned for both short and long terms are detailed along with the identified issues. Among others as described below:</p> <ul style="list-style-type: none"> i. Construction of perimeter drain in workshop areas ii. Segregation of domestic & recyclable waste iii. Filter media installed at final discharge point iv. Reduction in use of pesticide in mature and immature oil palm v. Reduction in use of pesticide in mature oil palm (fungicides). Integrated Pest Management via Beneficial Plants/ Barn Owls Boxes <p>Based on the samples taken, all environmental management plan related to the process were found to be continuously improve the estate operations and were within the industry good practices.</p> | Complied |
| 4.5.1.5 | <p>An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.</p> <p>- Major compliance -</p> | <p>The Estate continuously provide training to the workers to create awareness regarding the environmental policy and management plan established. Training program 2024 is available and updated on annually basis or revised as per the management requirement. Included in this program are subjects related to environment e.g., environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training. Training held in relation to the environmental management and awareness as shown below:</p> | Complied |

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| Subject | Date | | | | | | | | | | | | | | | | | | | | | | | | |
| OSH Legal & Other requirements | 19/01/2024 | | | | | | | | | | | | | | | | | | | | | | | | |
| ERP Chemical spill, poisoning, Fire | 22/05/2024 | | | | | | | | | | | | | | | | | | | | | | | | |
| Scheduled waste management | 08/01/2024 | | | | | | | | | | | | | | | | | | | | | | | | |
| Policies Awareness | 13/04/2024 | | | | | | | | | | | | | | | | | | | | | | | | |
| HCV Management | 19/01/2024 | | | | | | | | | | | | | | | | | | | | | | | | |
| MSDS/CSDS Understanding | 25/01/2024 | | | | | | | | | | | | | | | | | | | | | | | | |
| Chemical Handling | 19/04/2024 | | | | | | | | | | | | | | | | | | | | | | | | |
| Domestic Waste Management | 22/02/2024 | | | | | | | | | | | | | | | | | | | | | | | | |
| Water gate Management | 16/04/2024 | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.1.6 | Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance - | Discussions on environmental issues were discussed at the following forums: i. Annual Stakeholder meetings recent on 23/04/2024 ii. Quarterly OSH meeting - latest 25/06/2024 iii. Monthly management meeting should there be issues raised. iv. Daily briefing during muster The Estate stakeholder meetings for in combination with the mill management. Mainly the discussion in relation to environment focused on the scheduled waste and domestic waste handling. Minutes of meeting was sighted and verified. The quarterly OSH emphasized on issues of water management plan, waste management. | | | Complied | | | | | | | | | | | | | | | | | | | | |
| Criterion 4.5.2: Efficiency of energy use and use of renewable energy | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.2.1 | Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including | The estate records the following range data and tabulate the ratio against the FFB produced to determine the efficiency of their operations. There has been initiative by the management in reducing the diesel consumption through the following: | | | Complied | | | | | | | | | | | | | | | | | | | | |

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| | <p>fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p>- Major compliance -</p> | <p>i. Manual grass cutting reducing the tractor running hours.</p> <p>ii. Optimum running hours of tractors.</p> <p>iii. Scheduled maintenance of tractors.</p> <p>iv. Reduce utilization of tractors during low crop seasons.</p> <p>The energy management plan to reduce and eliminate wastage among others as follows:</p> <p>i. To ensure consistent supply of turbine and biogas engine power supply.</p> <p>ii. Timely servicing of vehicles to ensure efficient use of diesel & avoid leakages.</p> <p>iii. Educate employees on fuel/electricity saving practices.</p> <p>The utilization of fossil fuel in is being monitored with records shown below:</p> <table border="1"> <thead> <tr> <th>Year</th><th>Diesel/FFB</th><th>Year</th><th>Diesel/FFB</th></tr> </thead> <tbody> <tr> <td>2018</td><td>0.30</td><td>2021</td><td>0.16</td></tr> <tr> <td>2019</td><td>0.51</td><td>2022</td><td>0.20</td></tr> <tr> <td>2020</td><td>0.16</td><td>2023</td><td>0.16</td></tr> <tr> <td>-</td><td>-</td><td>B/line</td><td>0.30</td></tr> <tr> <td>-</td><td>-</td><td>Total</td><td>500181 L</td></tr> </tbody> </table> | Year | Diesel/FFB | Year | Diesel/FFB | 2018 | 0.30 | 2021 | 0.16 | 2019 | 0.51 | 2022 | 0.20 | 2020 | 0.16 | 2023 | 0.16 | - | - | B/line | 0.30 | - | - | Total | 500181 L | |
| Year | Diesel/FFB | Year | Diesel/FFB | | | | | | | | | | | | | | | | | | | | | | | | |
| 2018 | 0.30 | 2021 | 0.16 | | | | | | | | | | | | | | | | | | | | | | | | |
| 2019 | 0.51 | 2022 | 0.20 | | | | | | | | | | | | | | | | | | | | | | | | |
| 2020 | 0.16 | 2023 | 0.16 | | | | | | | | | | | | | | | | | | | | | | | | |
| - | - | B/line | 0.30 | | | | | | | | | | | | | | | | | | | | | | | | |
| - | - | Total | 500181 L | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.2.2 | <p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p>- Major compliance -</p> | <p>The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets. Refer details as per indicator 4.5.2.1 above. Figures were extracted from the diesel issuance of estate diesel tank.</p> | Complied | | | | | | | | | | | | | | | | | | | | | | | | |

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|-------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| 4.5.2.3 | The use of renewable energy should be applied where possible. - Minor compliance - | There was no opportunity to use renewable energy (shell/fibre/EFB) in the estate with the present technology and facilities within the industry. | Complied |
| Criterion 4.5.3: Waste management and disposal | | | |
| 4.5.3.1 | All waste products and sources of pollution shall be identified and documented. - Major compliance - | <p>All waste and pollution are identified and documented in the Environment Impact Assessment - Management Actions Plans & Continuous Improvement Plan 2024. The compilation was made by the HRSS (Sustainability Department) applicable to the estate. The common significant environmental receptors for the estate operations among others as summarized below;</p> <ul style="list-style-type: none"> i. Air - Sources from smoke and particulate), vehicle & generator (smoke and gases), field processes EFB mulching) - GHG ii. Water - Cleaning water/run-off/operations activities iii. Land - Scheduled waste, domestic waste and industrial/field operations. <p>The waste generated from the estates operations as shown below:</p> <ul style="list-style-type: none"> i. Scheduled Waste - Filter, lubricants, hydraulic oil, grease, used batteries ii. Domestic Waste - rubbish from the estate complex and employees' quarters iii. Industrial Waste - scrap iron iv. Sewage - Sewage from housing/office complex <p>The pollution identified from the estates activities as described below:</p> <ul style="list-style-type: none"> i. Black Smoke - Emission from vehicles/engines ii. Odor & Gases - Activities from the effluent treatment | Complied |

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|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------------|--------------------|----------------|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-----------------|--------------------------------------------------------------------------|-------------|-------------------------------------------------------------------------------|------|-------------------------------------------------------|----------|
| | | <p>iii. Leakage of lubricant - Storage & vehicle maintenance</p> <p>The estate also maintained records of quantity generated and disposal made for the scheduled waste. Based on the samples taken, the documentation and practices made in relation to the waste and pollution management were concluded effective to address concerns to the environmental quality.</p> | | | | | | | | | | | | | | |
| 4.5.3.2 | <p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p>- Major compliance -</p> | <p>The Waste Management and Disposal Plan are compiled in Environment Impact Assessment - Management Actions Plans & Continuous Improvement Plan 2024. The waste management plans has included measures to avoid or reduce pollution with review made annually.</p> <p>a) Procedures and guideline were used to guide the waste identifying and monitoring sources of waste and pollution.</p> <p>Details as described below:</p> <table><tr><th>Type</th><th>Description</th><th>Action to be taken</th></tr><tr><td>Domestic waste</td><td>Rubbish</td><td>Collection/disposal daily internally Establish collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site</td></tr><tr><td rowspan="3">Industrial waste</td><td>Fertilizer bags</td><td>Inventory of bags, reuse for LF collection, sell to appointed contractor</td></tr><tr><td>Scrap metal</td><td>Inventory maintained, tender at region level for sale to licensed contractor.</td></tr><tr><td>POME</td><td>Daily monitoring of application at designated fields.</td></tr></table> | Type | Description | Action to be taken | Domestic waste | Rubbish | Collection/disposal daily internally Establish collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site | Industrial waste | Fertilizer bags | Inventory of bags, reuse for LF collection, sell to appointed contractor | Scrap metal | Inventory maintained, tender at region level for sale to licensed contractor. | POME | Daily monitoring of application at designated fields. | Complied |
| Type | Description | Action to be taken | | | | | | | | | | | | | | |
| Domestic waste | Rubbish | Collection/disposal daily internally Establish collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site | | | | | | | | | | | | | | |
| Industrial waste | Fertilizer bags | Inventory of bags, reuse for LF collection, sell to appointed contractor | | | | | | | | | | | | | | |
| | Scrap metal | Inventory maintained, tender at region level for sale to licensed contractor. | | | | | | | | | | | | | | |
| | POME | Daily monitoring of application at designated fields. | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | | Compliance | | | | | | | |
|-----------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|------------|------|----------|--------------------|-----------------------|-----------|----------------------------------------------------------|--|
| | | Sewage waste | Sewage | To monitor during housing inspection and residents' complaints Engagement with licensed contractor for sewage management. | | | | | | | | |
| | | Scheduled Waste | SW 404 Clinical waste | Inventory maintained. Storage in sharp bin in clinic. Disposal to Future NRG Sdn Bhd (licensed contractor) | | | | | | | | |
| | | | SW rags, plastics, filters | Inventory maintained. Storage in scheduled waste store. Disposal to agenda EDSHA Solutions Sdn Bhd | | | | | | | | |
| | | | Spent lubricant & hydraulic oil | Collection by licensed vendor. Inventory maintained. Disposal EDSHA Solutions Sdn Bhd | | | | | | | | |
| | | | Disposed containers, bags, equipment contaminated with chemicals | Inventory maintained. Storage in SW store. All containers are labeled. Empty containers are disposed as SW409 to EDSHA Solutions Sdn Bhd. | | | | | | | | |
| | | b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products. | | | | | | | | | | |
| | | The disposal/recycling of waste generated by the estates are made as follows: | | | | | | | | | | |
| | | <table><tr><th>Type</th><th>Location</th><th>Action to be taken</th></tr><tr><td>Petrol oil, lubricant</td><td>Gen store</td><td>Keep items in designated area i.e. bund 110% of capacity</td></tr></table> | | | | Type | Location | Action to be taken | Petrol oil, lubricant | Gen store | Keep items in designated area i.e. bund 110% of capacity | |
| | | Type | Location | Action to be taken | | | | | | | | |
| | | Petrol oil, lubricant | Gen store | Keep items in designated area i.e. bund 110% of capacity | | | | | | | | |
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|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| | | Chemical | | Establish recovery procedure - accidental spillage. Kit available | |
| | | Scheduled waste | SW store | Comply to EQA requirement Dispose as SW & maintain record. | |
| | | Domestic/ office waste | Office | Implement recycling of waste Provide bins Continuous education on environmental issues and program. | |
| | | Toilet & kitchen | | | |
| | | Used oil & grease | Workshop | Display signboards & provide litter bins Continuous education on environmental issues and program. Collect discarded materials for recycling Provide training on recycling | |
| | | Metal waste | | | |
| | | Oil drum/tank | | | |
| | | Domestic waste | Labour line | Display signboards & provide litter bins Provide training on recycling | |
| | | Toilet & kitchen waste | Labour line | Ensure no accidental spillage Cease using facilities in event of non-functional | |
| 4.5.3.3 | The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. - Major compliance - | The SOP on Scheduled Waste disposal is established and implemented. Details as provided in UPB Standard Operating Procedure Handling of Scheduled Waste (Hazardous Waste) Management dated 09/04/2021. The inventory of the waste generated is recorded using the "E-SWISS" inventory system. All SW are disposed to EXXXA Sxxxxxxs Sdn Bhd (license no 004253 valid till 30/04/2025) and SW 404 disposed to Fxxxxe NXX Sdn Bhd Sxxxxxxn NX Sdn Bhd (license 006044 expiring 30/04/25). The estate combined dispatch with the mill SW under the | | | Complied |

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|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------|------|-------|------------|-------|------------|-------|------|-------|------|-------|------------|-------|------------|-------|--|
| | | <p>central workshop management for other types of SW. Empty containers are tripled rinsed and sold as non-SW:</p> <table border="1"> <tr> <td>Date</td><td>SW410</td><td>Date</td><td>SW409</td></tr> <tr> <td>02/04/2024</td><td>0.010</td><td>02/04/2024</td><td>0.500</td></tr> </table> <table border="1"> <tr> <td>Date</td><td>SW404</td><td>Date</td><td>SW404</td></tr> <tr> <td>07/06/2024</td><td>0.018</td><td>20/01/2024</td><td>0.003</td></tr> </table> <p>The estates based on the documents and sites visits made verified that the SW waste management is effective in handling environmental issues and in compliance to the regulatory requirement.</p> | Date | SW410 | Date | SW409 | 02/04/2024 | 0.010 | 02/04/2024 | 0.500 | Date | SW404 | Date | SW404 | 07/06/2024 | 0.018 | 20/01/2024 | 0.003 | |
| Date | SW410 | Date | SW409 | | | | | | | | | | | | | | | | |
| 02/04/2024 | 0.010 | 02/04/2024 | 0.500 | | | | | | | | | | | | | | | | |
| Date | SW404 | Date | SW404 | | | | | | | | | | | | | | | | |
| 07/06/2024 | 0.018 | 20/01/2024 | 0.003 | | | | | | | | | | | | | | | | |
| 4.5.3.4 | <p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p>- Major compliance -</p> | <p>The SOP of disposal pesticide container is described in the estates, procedure Details as provided in UPB Standard Operating Procedure Handling of Scheduled Waste (Hazardous Waste) Management dated 09/04/2021. Content includes the triple rinsing procedures and the relevant training to be conducted. Under the operational control procedure established as given in 4.5.3.3 above the guideline and practice for handling empty pesticides containers are as follows.</p> <ul style="list-style-type: none"> i. All class 2 and above containers are tripled rinsed, and holes punctured at the bottom only if the waste generator is to dispose as non-scheduled waste. ii. Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process. iii. Empty containers were tripled rinsed, punctured, and delivered as SW 409. Others were used recycled for chemical containers for spraying purposes. | Complied | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | |
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| | | <div>The estates disposed to a registered recycler M/S Pxxxxxs Exxxxxxe (registered with SSM dated 30/12/2022. Despatches as recorded below:</div> <table><tr><td>Items</td><td>Quantity</td><td>Date</td></tr><tr><td>20L Empty Container</td><td>680 kg</td><td>06/06/2024</td></tr><tr><td>20L Empty Container</td><td>730 kg</td><td>02/04/2024</td></tr><tr><td>20L Empty Container</td><td>700 kg</td><td>06/02/2024</td></tr><tr><td>Paper Boxes</td><td>1390 kg</td><td>05/06/2024</td></tr></table> | Items | Quantity | Date | 20L Empty Container | 680 kg | 06/06/2024 | 20L Empty Container | 730 kg | 02/04/2024 | 20L Empty Container | 700 kg | 06/02/2024 | Paper Boxes | 1390 kg | 05/06/2024 | |
| Items | Quantity | Date | | | | | | | | | | | | | | | | |
| 20L Empty Container | 680 kg | 06/06/2024 | | | | | | | | | | | | | | | | |
| 20L Empty Container | 730 kg | 02/04/2024 | | | | | | | | | | | | | | | | |
| 20L Empty Container | 700 kg | 06/02/2024 | | | | | | | | | | | | | | | | |
| Paper Boxes | 1390 kg | 05/06/2024 | | | | | | | | | | | | | | | | |
| 4.5.3.5 | <div>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</div> <div>- Minor compliance -</div> | <div>Domestic wastes were disposed according to the waste management plan. The management disposed the domestic waste for both the mill and estate complex to the internal land fill disposal site located at field no 19 - PM2024 with daily collection. Two workers are assigned to segregate the recyclable items at site. The risk of contamination has been minimized through this system.</div> | Complied | | | | | | | | | | | | | | | |
| Criterion 4.5.4: Reduction of pollution and emission | | | | | | | | | | | | | | | | | | |
| 4.5.4.1 | <div>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.</div> <div>- Major compliance -</div> | <div>The environmental aspect and impact have been identified the polluting activities in the estate. This included gas emissions, scheduled waste, solid waste and general waste. The polluting activities are identified and documented in the Environmental Aspect & Impact Identification. From the EAI, it will be evaluated for the impact. The identified impact if any will be included in the management plan. The evaluation is documented in the Environmental Impact Evaluation with latest review on 23/05/2024 with no major changes to the estate’s activities. Areas of focus among others include activities:</div> <div><div>i. Chemical Store / general store</div><div>ii. Workshop</div></div> | Complied | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| | | <p>iii. Scheduled waste / diesel tank</p> <p>iv. Chemical store / mixing areas</p> <p>v. Workshop / Catchment Pond /</p> <p>vi. Effluent land application area Field 82 – PM2010</p> <p>The plan to reduce or minimize the GHG emission has been established and implemented. In general, among the action plans were: -</p> <p>i. To optimize the usage of diesel</p> <p>ii. To apply more organic fertilizer such as bunch ash, EFB therefore reducing inorganic fertilizer dependency.</p> <p>The estate continued to maintain its environmental aspects/impacts register associated with their activities. The 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly.</p> <p>The pollution identified from the estates activities as described below:</p> <p>i. Black Smoke - Emission from vehicles/engines</p> <p>ii. Odor & Gases - Activities from the effluent treatment</p> <p>iii. Leakage of lubricant - Storage & vehicle maintenance</p> <p>In general, among the action plans were: -</p> <p>i. To optimize the usage of diesel</p> <p>ii. To apply more organic fertilizer such as bunch ash, EFB therefore reducing inorganic fertilizer dependency</p> <p>iii. Full compliance to zero burning practices</p> | |
| 4.5.4.2 | An action plan to reduce identified significant pollutants and emissions shall be established and implemented. | The Pollution Prevention Management Plan 2024 was established at estates and reviewed annually. The following issues and mitigation | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| | - Major compliance - | program among others have been identified. The improvement plan include: | |
| | | Objectives | |
| | | To minimize pollution from estate activities | |
| | | Improvement Plan | |
| | | Recycling of fertilizer bags | |
| | | Daily checking / maintenance spraying pumps | |
| | | Preventive maintenance of farm vehicles | |
| | | Spill tray for farm vehicle | |
| | | Sump oil trap at workshop / premix area | |
| | | No open burning | |
| | | Weekly housing inspection | |
| | | Management of scheduled waste | |
| | | To ensure all SW being stored and disposed as per legal requirement | |
| | | Regular inspection for estates vehicles | |
| | | Maintenance PCD to prevent spillage | |
| | | Replanting activities | |
| | | Cover crop planting / Beneficial Plant Planting | |
| | | EFB mulching | |
| | | The GHG emissions due to the operations is identified and recorded in the palm GHG version 3.01. The emission reduction plan for the estate includes reduction of fertilizer usage by embarking organic fertilizer and EFB application. | |
| | | Issues & Strategies | |
| | | Action Plan | |
| | | Reduce diesel consumption at estates operations | To monitor diesel usage To ensure vehicle scheduled maintenance optimum gen set usage |
| | | Reduce smoke emission to the air | Implement PMV for all vehicles |
| | | Reduce electricity usage | Monitor usage vs baseline install capacitor at identified large power |

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| | | | consumption motor install LED bulb for the lighting system | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criterion 4.5.5: Natural water resources | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.5.1 | <p>The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <p>a. Assessment of water usage and sources of supply.</p> <p>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities.</p> <p>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p> | <p>The Water Management Plan 2024 for the estates has been established with the latest review dated 23/05/2024. This is compiled on Group basis and amended to meet demands of specific issue in the estates.</p> <p>a) The estate recorded the water usage and sources of supply. and received supply for the state government supply i.e LAP Lembaga Air Perak</p> <table><tr><td></td><td>2021</td><td>2022</td><td colspan="2">2023</td></tr><tr><td>Water m3</td><td>143498</td><td>149377</td><td colspan="2">148540</td></tr><tr><td>FFB/ mt</td><td>284197</td><td>281921</td><td colspan="2">290612</td></tr><tr><td>Water/ FFB mt</td><td>0.506</td><td>0.530</td><td colspan="2">0.511</td></tr><tr><td>Baseline/ FFB</td><td>0.500</td><td>0.500</td><td colspan="2">0.500</td></tr></table> <p>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities.</p> <p>Water sampling was taken annually to test against the industrial effluent water analysis at 10 points in the estate including inlet/outlet of Sg Anak Machang, Sg Bruas and 6 canal points in the estate. Analysis as shown below:</p> <table><tr><td></td><td colspan="2">Sg Bruas</td><td colspan="2">Sg Anak Machang</td></tr><tr><td>04/10/2023</td><td>Inlet</td><td>Outlet</td><td>Inlet</td><td>Outlet</td></tr><tr><td>pH</td><td>6.40</td><td>6.20</td><td>6.50</td><td>6.20</td></tr><tr><td>BOD mg/L</td><td>6</td><td>18</td><td>5</td><td>14</td></tr></table> | | | | | 2021 | 2022 | 2023 | | Water m3 | 143498 | 149377 | 148540 | | FFB/ mt | 284197 | 281921 | 290612 | | Water/ FFB mt | 0.506 | 0.530 | 0.511 | | Baseline/ FFB | 0.500 | 0.500 | 0.500 | | | Sg Bruas | | Sg Anak Machang | | 04/10/2023 | Inlet | Outlet | Inlet | Outlet | pH | 6.40 | 6.20 | 6.50 | 6.20 | BOD mg/L | 6 | 18 | 5 | 14 | Complied |
| | 2021 | 2022 | 2023 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Water m3 | 143498 | 149377 | 148540 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| FFB/ mt | 284197 | 281921 | 290612 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Water/ FFB mt | 0.506 | 0.530 | 0.511 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Baseline/ FFB | 0.500 | 0.500 | 0.500 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Sg Bruas | | Sg Anak Machang | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 04/10/2023 | Inlet | Outlet | Inlet | Outlet | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| pH | 6.40 | 6.20 | 6.50 | 6.20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BOD mg/L | 6 | 18 | 5 | 14 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <table><tr><td>COD mg/L</td><td>38</td><td>56</td><td>32</td><td>49</td></tr><tr><td>S Solids mg/l</td><td>11</td><td>16</td><td>11</td><td>12</td></tr><tr><td>Oil & Grease</td><td><1</td><td><1</td><td><1</td><td><1</td></tr><tr><td>Dissolved Oxygen</td><td>5.70</td><td>4.30</td><td>5.80</td><td>4.10</td></tr><tr><td>Am Nitrogen</td><td><0.05</td><td><0.05</td><td><0.05</td><td><0.05</td></tr><tr><td>E Coli cfu/100ml</td><td><1</td><td><1</td><td><1</td><td><1</td></tr></table> <p>All results are classified in ware class III and with parameters complying to the standard. All BOD level is well below 20 mg/l. Drinking water is supplied by Lembaga Air Perak for the entire estate complex.</p> <p>c) The following plan to optimize water and nutrient usage to reduce wastage has been compiled with details below.</p> <ul style="list-style-type: none">i. To obtain water from LAP/ mill catchment in event of shortages.ii. To train/ educate staff/ workers to conserve wateriii. Collection of rainwater from water harvestingiv. Construction of roadside pit for a better water drainagev. Recycling of washing/ chemical mixing water for weeding purposes. <p>d) Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>The estate continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estate adopted the existing UPB policy to maintain the buffer by restricting agrochemical application and</p> | | | | | COD mg/L | 38 | 56 | 32 | 49 | S Solids mg/l | 11 | 16 | 11 | 12 | Oil & Grease | <1 | <1 | <1 | <1 | Dissolved Oxygen | 5.70 | 4.30 | 5.80 | 4.10 | Am Nitrogen | <0.05 | <0.05 | <0.05 | <0.05 | E Coli cfu/100ml | <1 | <1 | <1 | <1 | |
| COD mg/L | 38 | 56 | 32 | 49 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| S Solids mg/l | 11 | 16 | 11 | 12 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oil & Grease | <1 | <1 | <1 | <1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dissolved Oxygen | 5.70 | 4.30 | 5.80 | 4.10 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Am Nitrogen | <0.05 | <0.05 | <0.05 | <0.05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| E Coli cfu/100ml | <1 | <1 | <1 | <1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in UPB dated Nov 2021. The buffer zones established are as follows:</p> <table><tr><td>River width</td><td>Buffer zone</td><td></td><td>River width</td><td>Buffer zone</td></tr><tr><td>> 40 meters</td><td>50 meters</td><td></td><td>5-10 meters</td><td>10 meters</td></tr><tr><td>20 - 40 m</td><td>40 meters</td><td></td><td>< 5 meters</td><td>5 meters</td></tr><tr><td>10-20 m</td><td>20 meters</td><td></td><td>-</td><td>-</td></tr></table> <p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the HRSS (Human Resource Sustainability Safety Department) with latest revision dated on 10/11/21. During the field visit there was no spraying activities or signs left in such an area. The buffer zones identified at the estate are at Waterways located at 6 canal points.</p> <p>e) Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>During the site visit the buffer zones were well maintained as per the guidelines and SOP. Among others management plan taken by the estates are:</p> <ul style="list-style-type: none">i. Regular inspection at buffer/HCV areasii. Monitor water from surrounding areasiii. Track, measure and report all activities around riveriv. Train and educate workers <p>f) There is no water supply use by bore well.</p> | | | | River width | Buffer zone | | River width | Buffer zone | > 40 meters | 50 meters | | 5-10 meters | 10 meters | 20 - 40 m | 40 meters | | < 5 meters | 5 meters | 10-20 m | 20 meters | | - | - | |
| River width | Buffer zone | | River width | Buffer zone | | | | | | | | | | | | | | | | | | | | | | |
| > 40 meters | 50 meters | | 5-10 meters | 10 meters | | | | | | | | | | | | | | | | | | | | | | |
| 20 - 40 m | 40 meters | | < 5 meters | 5 meters | | | | | | | | | | | | | | | | | | | | | | |
| 10-20 m | 20 meters | | - | - | | | | | | | | | | | | | | | | | | | | | | |

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| 4.5.5.2 | No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance - | The estate complied to this requirement. This requirement is also audited internally by the (Human Resource Sustainability Safety Department. During the field visit no construction of such obstruction was observed. There is no major river flowing within vicinity in the estate except for internal water streams Sg Bruas and Sg Anak Machang as conservation areas and major field drains. | Complied |
| 4.5.5.3 | Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). - Minor compliance - | Practices on water harvesting such as roadside drains had been constructed and water has been directed to conservation terraces, pruned fronds were stacked along the palm row. Practices of water harvesting are mainly constructed on flat areas. Roadside pits were also available at every 3 palm rows, to divert in event of water overflowing and also to benefit the nearest palm at the pit end to obtain additional moisture. In addition, water harvesting has been practiced for roadside drain where sandbag weir has been established to collect the water that flow in the roadside drain. This is part of the common practices introduced within the UPB Group Agriculture Procedures. | Complied |
| Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value | | | |
| 4.5.6.1 | Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover: a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat | The Initial HCV assessment was compiled by Wild Asia in report titled "A Conservation Assessment of United Plantation's Perak Estates – Conservation Values & Recommendations" dated on 14/01/2008. Thereafter the management reviewed the HCV assessment internally on 05/08/2020 by Mr Lee Kian Wei (B Sc Sustainability Science) from the HRSS Department. a) The assessment generally has the description about methodology used, coverage and the findings on presence of HCV and RTE species. | Complied |

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| | <p>requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</p> <p>- Major compliance -</p> | <p>i. There is identification of biodiversity habitat was stated in the report. This is to ensure the ecosystem was protected.</p> <p>ii. There is identification of species of animal such and the habitat observed and monitoring for protection.</p> <p>It was summarized that UIE estate possessed 1 HCV 4 (riparian Sg Anak Machang) with total 12.53 ha. The inhouse assessment was referred to the Common Guidance for the identification of High Conservation Values endorsed by HCV Resource Network. In addition, UIE estate proactively conserves certain areas along the riparian state land as self-declared conservation area. Details as shown below:</p> <table><tr><th>Date</th><th>Area</th><th>Justification</th></tr><tr><td>05/08/2020</td><td>Sg Anak Machang Riparian</td><td>HCV 4 (12.53 ha)</td></tr><tr><td>05/08/2020</td><td>Kingham Cooper Nursery Bek-Nielsen Sanctuary Bukit Kecil Jungle Reserve</td><td>- 20.23 ha - 74.42 ha - 10.53 ha</td></tr><tr><td>05/08/2020</td><td>Sg Bruas Riparian</td><td>River located at boundary of estate and within estate reserve land.</td></tr></table> <p>b) Common wildlife found during the assessment were documented in the HCV Assessment. Methodology is through site observation, interviews, stakeholders’ consultation, and desktop review on available secondary data. The assessment among others covers the following areas:</p> <p>i. Overview of HCV assessment.</p> | Date | Area | Justification | 05/08/2020 | Sg Anak Machang Riparian | HCV 4 (12.53 ha) | 05/08/2020 | Kingham Cooper Nursery Bek-Nielsen Sanctuary Bukit Kecil Jungle Reserve | - 20.23 ha - 74.42 ha - 10.53 ha | 05/08/2020 | Sg Bruas Riparian | River located at boundary of estate and within estate reserve land. | |
| Date | Area | Justification | | | | | | | | | | | | | |
| 05/08/2020 | Sg Anak Machang Riparian | HCV 4 (12.53 ha) | | | | | | | | | | | | | |
| 05/08/2020 | Kingham Cooper Nursery Bek-Nielsen Sanctuary Bukit Kecil Jungle Reserve | - 20.23 ha - 74.42 ha - 10.53 ha | | | | | | | | | | | | | |
| 05/08/2020 | Sg Bruas Riparian | River located at boundary of estate and within estate reserve land. | | | | | | | | | | | | | |

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| | | <ul style="list-style-type: none"> ii. Description of assessment areas. iii. Finding and discussion <ul style="list-style-type: none"> - Landscape context - HCV criteria and application to agriculture iv. HCV monitoring and management <p>Birds, mammals, reptiles, insect (least concern and vulnerable) and totally protected and protected wildlife were identified based on the latest HCV Management Plan 10/07/2023. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented. The HCVs, conservation areas/environmentally sensitive areas e.g., bund along the stretches of river/canals which passes bordering through the estate had been identified and being monitored.</p> | |
| 4.5.6.2 | <p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <ul style="list-style-type: none"> a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. <p>- Major compliance -</p> | <p>There is no RTE or high biodiversity value at estate complex except for reported presence of snakes, monkeys and wild boars. The management and monitoring plan for HCV areas was established and reviewed annually. There were displays of signage made at site i.e.</p> <ul style="list-style-type: none"> i. No fishing, no manuring/ no spraying. ii. No spraying/ no hunting/ no swimming. <p>Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented. Signage as well as routine patrolling activities were utilized as part of creating awareness among employees and maintain HCV. The estate had established a HCV action plan 2024 such as;</p> | Complied |

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| | | <p>i. Ensuring all legal requirements to the protection of species/habitat are met.</p> <p>ii. Controlling any illegal /inappropriate hunting, fishing and developing measures to resolve human-wildlife conflicts</p> <p>iii. Protection of buffers zones for respective rivers as identified in the HCV assessment. Communications are made to all employees, contractors, suppliers and neighbor informing that encroachment and hunting are not allowed.</p> <p>There were programs held by the estate to all employees in pertaining to the awareness of HCV areas and RTE species. Interview with the employees concluded that training and briefing made during the ad hoc session and morning muster. This is also emphasized during the training held by estate programs. Employees are aware of the following measures;</p> <p>i. An offence to capture, harm, kills any wildlife.</p> <p>ii. Disciplinary measures shall be taken if found violating company rules.</p> <p>iii. Riparian buffer zone to be free from any chemical's application/pollution</p> <p>Training in relation to the HCV management are provided to the employees as shown below:</p> <table><tr><td>Subject</td><td>Date</td></tr><tr><td>OSH Legal & Other requirements</td><td>19/01/2024</td></tr><tr><td>Policies Awareness</td><td>13/04/2024</td></tr><tr><td>HCV Management</td><td>19/01/2024</td></tr><tr><td>Canal / Water gate Management</td><td>16/04/2024</td></tr></table> | Subject | Date | OSH Legal & Other requirements | 19/01/2024 | Policies Awareness | 13/04/2024 | HCV Management | 19/01/2024 | Canal / Water gate Management | 16/04/2024 | |
| Subject | Date | | | | | | | | | | | | |
| OSH Legal & Other requirements | 19/01/2024 | | | | | | | | | | | | |
| Policies Awareness | 13/04/2024 | | | | | | | | | | | | |
| HCV Management | 19/01/2024 | | | | | | | | | | | | |
| Canal / Water gate Management | 16/04/2024 | | | | | | | | | | | | |

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| <p>4.5.6.3 A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p> | <p>The estates had established HCV Management Plan 10/07/2023 based on the HCV identified in the report. Reviewed and sighted the implementation of the management plan as follows:</p> <ul style="list-style-type: none"> i. The estate continuously provided training on HCV and RTE to the workers to ensure the satisfactory understanding. Reviewed the training records conducted as shown in 4.5.6.2. ii. The estate conducted monitoring on HCV area on monthly basis. The monitoring focusing on encroachment/ sign of trespassing, wildlife issues/ conflicts/ Sightings, Pollution/ erosion issues and others. Noted during site visit, the condition of the HCV area was consistent with the reports. <p>The estate had developed Management Plan for the HCV and conservation area to protect from any encroachment. Among others consists of the following:</p> <ul style="list-style-type: none"> i. To continue educating the workers regarding RTE. Workers interviewed confirmed that they are aware of no hunting is permitted in and within the estate. ii. Regular educating the employees via morning muster briefing about the need to protect the RTE species. iii. Appropriate disciplinary measures will be taken if found violated. Inspection of housing areas and interview of residents confirmed workers were aware of the company policy that prohibits hunting and collecting activities. iv. Information pertaining RTE and relevant policies were displayed at the display boards. v. Buffer zone establishment to map areas and install buffer zone pegs. | <p>Complied</p> |

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| | | vi. Encroachment control in HCV area and monitoring. | |
| Criterion 4.5.7: Zero burning practices | | | |
| 4.5.7.1 | Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance - | The UPB Group policy of "Zero open burning" is enforced since July 2008. The Estate adhered to the policy of "Zero open burning" for any replanting. Interviews with the workers there is no open burning being practiced in the estates. UPB practiced zero burning as per the policy in: i. Environment and Biodiversity Policy ii. Replanting SOP - Under felling/clearing & land preparation dated 18/02/2008 As advocated, the estate practiced zero burning. In replants all palms were felled, shredded, windrow-ed and left to decompose. | Complied |
| 4.5.7.2 | A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance - | N/A. No special approval from the relevant authorities. | Not Applicable |
| 4.5.7.3 | Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance - | N/A. No controlled burning is allowed. | Not Applicable |
| 4.5.7.4 | Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance - | This is included in the specification of work orders in event of land preparation during a replanting. It is a standard practice in United Plantations Berhad. However, there are variations of practices subject to the geographical condition of estates. Trunks are felled and chipped | Complied |

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| | | without having to shred and windrowed in certain conditions. Adjustment of work requirement are finalized from the directive of the replanting unit and the Head Office. | | | | | | | | | |
| 4.6 Principle 6: Best Practices | | | | | | | | | | | |
| Criterion 4.6.1: Site Management | | | | | | | | | | | |
| 4.6.1.1 | Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance - | Standard operating procedures has been appropriately documented and consistently implemented and monitored. The Standard Operating procedure (SOP) described details of operation process flow and the safety precaution. Sighted the evidence: <table><tr><td>Document</td><td>Standard Operating Procedure (SOP)</td></tr><tr><td>Date</td><td>01/1/2008</td></tr><tr><td>Category</td><td>Occupational Safety & Health Manual</td></tr><tr><td>Date</td><td>20/2/2008</td></tr></table> | Document | Standard Operating Procedure (SOP) | Date | 01/1/2008 | Category | Occupational Safety & Health Manual | Date | 20/2/2008 | Complied |
| Document | Standard Operating Procedure (SOP) | | | | | | | | | | |
| Date | 01/1/2008 | | | | | | | | | | |
| Category | Occupational Safety & Health Manual | | | | | | | | | | |
| Date | 20/2/2008 | | | | | | | | | | |
| 4.6.1.2 | Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. - Major compliance - | The estate terrain is 100% flat-undulating. This was observed during field visit and as per Topographic Map UIE Estate. The management also applied the best practices such planting of cover crop, EFB mulching, and POME application were carried out to retain the soil structure and conservation. | Complied | | | | | | | | |
| 4.6.1.3 | A visual identification or reference system shall be established for each field. - Major compliance - | All fields are marked and identified. Information such as year of planting, field no and the total hectare is shown in all markers. There are both stencilled at the palm trees and displayed on signage at the boundary/corners of every fields. This was observed during the field visit. Sighted the evidence: | Complied | | | | | | | | |

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| | | Document | Block Marking | | | | | | | | | | | | | |
| | | Field No | No 69 | | | | | | | | | | | | | |
| | | Field Size | 61.99 Ha | | | | | | | | | | | | | |
| | | Year Planting | 2016 | | | | | | | | | | | | | |
| | | Material | D x P (UP) | | | | | | | | | | | | | |
| Criterion 4.6.2: Economic and financial viability plan | | | | | | | | | | | | | | | | |
| 4.6.2.1 | A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance - | The management plan has established mechanism to demonstrate attention to economic and financial viability through long-term management planning. The management has prepared budget and production report. Refer to report it was mentioned the allocation for FFB production, FFB Yield, Cost Per Hectare and others. Sighted the evidence: <table><tr><td>Document</td><td>Production Report – Estate 2</td></tr><tr><td>Month</td><td>June 2024</td></tr><tr><td>FFB Produced (Estimate)</td><td>9,600.00 Mt</td></tr><tr><td>FFB Produced (Actual)</td><td>12,336.36 Mt</td></tr><tr><td>Yield / Ha (Estimate)</td><td>12.80 Mt/Ha</td></tr><tr><td>Yield / Ha (Actual)</td><td>15.35 Mt/Ha</td></tr></table> | | Document | Production Report – Estate 2 | Month | June 2024 | FFB Produced (Estimate) | 9,600.00 Mt | FFB Produced (Actual) | 12,336.36 Mt | Yield / Ha (Estimate) | 12.80 Mt/Ha | Yield / Ha (Actual) | 15.35 Mt/Ha | Complied |
| Document | Production Report – Estate 2 | | | | | | | | | | | | | | | |
| Month | June 2024 | | | | | | | | | | | | | | | |
| FFB Produced (Estimate) | 9,600.00 Mt | | | | | | | | | | | | | | | |
| FFB Produced (Actual) | 12,336.36 Mt | | | | | | | | | | | | | | | |
| Yield / Ha (Estimate) | 12.80 Mt/Ha | | | | | | | | | | | | | | | |
| Yield / Ha (Actual) | 15.35 Mt/Ha | | | | | | | | | | | | | | | |
| 4.6.2.2 | Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance - | The management has established the replanting programmed which is allocate for the 5 years. The programmed has been implemented where the oil palm is over 25 years. The replanting programmed also monitored and documented. Sighted the evidence: <table><tr><td>Document</td><td>Replanting Programmed</td></tr><tr><td>Year 2016</td><td>1,221.54 Ha</td></tr><tr><td>Year 2017</td><td>620.69 Ha</td></tr><tr><td>Year 2018</td><td>898.33 Ha</td></tr><tr><td>Year 2019</td><td>32.00 Ha</td></tr></table> | | Document | Replanting Programmed | Year 2016 | 1,221.54 Ha | Year 2017 | 620.69 Ha | Year 2018 | 898.33 Ha | Year 2019 | 32.00 Ha | Complied | | |
| Document | Replanting Programmed | | | | | | | | | | | | | | | |
| Year 2016 | 1,221.54 Ha | | | | | | | | | | | | | | | |
| Year 2017 | 620.69 Ha | | | | | | | | | | | | | | | |
| Year 2018 | 898.33 Ha | | | | | | | | | | | | | | | |
| Year 2019 | 32.00 Ha | | | | | | | | | | | | | | | |

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| | | Year 2020 | 0.00 Ha | | | | | | | | | | | | | | | | | | | |
| | | For the year from 2021 – 2025 there is no programmed for replanting. This is because the programmed was completed at Year 2019. | | | | | | | | | | | | | | | | | | | | |
| 4.6.2.3 | The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment - Major compliance - | The management plan has established mechanism to demonstrate attention to economic and financial viability through long-term management planning. The management has prepared budget and production report. Refer to report it was mentioned the allocation for FFB production, FFB Yield, Cost Per Hectare and others. Sighted the evidence: <table><tr><td>Document</td><td>Production Report – Estate 2</td></tr><tr><td>Month</td><td>June 2024</td></tr><tr><td>FFB Produced (Estimate)</td><td>9,600.00 Mt</td></tr><tr><td>FFB Produced (Actual)</td><td>12,336.36 Mt</td></tr><tr><td>Yield / Ha (Estimate)</td><td>12.80 Mt/Ha</td></tr><tr><td>Yield / Ha (Actual)</td><td>15.35 Mt/Ha</td></tr><tr><td>Cost / FFB (Estimate)</td><td>RM1066.13 / Mt</td></tr><tr><td>Cost / FFB (Actual)</td><td>RM950.85 / Mt</td></tr><tr><td>Planting Material</td><td>D x P (UP)</td></tr></table> | | Document | Production Report – Estate 2 | Month | June 2024 | FFB Produced (Estimate) | 9,600.00 Mt | FFB Produced (Actual) | 12,336.36 Mt | Yield / Ha (Estimate) | 12.80 Mt/Ha | Yield / Ha (Actual) | 15.35 Mt/Ha | Cost / FFB (Estimate) | RM1066.13 / Mt | Cost / FFB (Actual) | RM950.85 / Mt | Planting Material | D x P (UP) | Complied |
| Document | Production Report – Estate 2 | | | | | | | | | | | | | | | | | | | | | |
| Month | June 2024 | | | | | | | | | | | | | | | | | | | | | |
| FFB Produced (Estimate) | 9,600.00 Mt | | | | | | | | | | | | | | | | | | | | | |
| FFB Produced (Actual) | 12,336.36 Mt | | | | | | | | | | | | | | | | | | | | | |
| Yield / Ha (Estimate) | 12.80 Mt/Ha | | | | | | | | | | | | | | | | | | | | | |
| Yield / Ha (Actual) | 15.35 Mt/Ha | | | | | | | | | | | | | | | | | | | | | |
| Cost / FFB (Estimate) | RM1066.13 / Mt | | | | | | | | | | | | | | | | | | | | | |
| Cost / FFB (Actual) | RM950.85 / Mt | | | | | | | | | | | | | | | | | | | | | |
| Planting Material | D x P (UP) | | | | | | | | | | | | | | | | | | | | | |
| 4.6.2.4 | The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance - | The management plan has established to demonstrate attention to economic and financial viability through long-term management planning. The management has prepared budget plan. Refer the budget plan it was mentioned the allocation of cost to administrative, maintenance cost, upkeep cost, production of FFB cost, salary all staff and workers. Sighted the evidence: <table><tr><td>Document 1</td><td>Production Report – Daily</td></tr><tr><td>Document 2</td><td>Production Report – Monthly</td></tr><tr><td>Document 3</td><td>Management Account - Monthly</td></tr></table> | | Document 1 | Production Report – Daily | Document 2 | Production Report – Monthly | Document 3 | Management Account - Monthly | Complied | | | | | | | | | | | | |
| Document 1 | Production Report – Daily | | | | | | | | | | | | | | | | | | | | | |
| Document 2 | Production Report – Monthly | | | | | | | | | | | | | | | | | | | | | |
| Document 3 | Management Account - Monthly | | | | | | | | | | | | | | | | | | | | | |

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|------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|------------|
| | | Document 4 | Annual Budget – Yearly | |
| Criterion 4.6.3: Transparent and fair price dealing | | | | |
| 4.6.3.1 | Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance - | Evident the contractor agreement between United Plantations Berhad and contractors as follow: K Kxxxr Excxxxxor – The contractor agrees to provide excavator(s) including operator to carry out various work which will be directed by the Estate from time to time. The Rates of Contract Value stated in the agreement for Hiring of Excavator and Drain Works. All extra operations not included in the agreement will be carried out at the same rate and standards as required by United Plantations Berhad. The agreement signed and delivered by Deputy Group Manager and K Kxxxr Excxxxxor. The agreement is valid from 1 January 2024 to 31 December 2024 unless terminated earlier under Clause 8. | | Complied |
| 4.6.3.2 | All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance - | The management has established pricing mechanism and conducted as per contract agreement with contractors. Review on the contract agreement, sighted pricing of the job task is available. Payment terms for contract work were stated in the contract agreement as stated in 4.6.3.1. Also stated in the agreement: All payment to the Contractor will be made by 7 th of the current month based on all satisfactory work completed in the previous month, the rates of the payment should be as per attached document in the agreement. Evident the listing of work done by K Kxxxr Excxxxxor for the month ended May 2024 and certificate of payment dated 31/05/2024, CP | | Complied |

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|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| | | No:62240222 and MOA No:09326. The recommended or certified for payment have been made on 02/06/2024. Onsite consultation with contractors informed their payments were made as per payment terms stated in the contracts. No delayed of payments recorded. | |
| Criterion 4.6.4: Contractor | | | |
| 4.6.4.1 | Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance - | Evident the contractor agreement between United Plantations Berhad and contractors. Stated in the agreement: The contractor shall adhere to the attached UP's Company Policies as follow which are required under MSPO and RSPO certifications such as Human Rights Policy (e.g.: no child labor and trafficked labor and equal treatment), OSH policy, gender policy, valid employment contract for contractor workers, minimum wages order, etc. | Complied |
| 4.6.4.2 | The management shall provide evidence of agreed contracts with the contractor. - Major compliance - | Evident the contractor agreement between United Plantations Berhad and contractors as follow: K Kxxxr Excxxxxor – The contractor agrees to provide excavator(s) including operator to carry out various work which will be directed by the Estate from time to time. The Rates of Contract Value stated in the agreement for Hiring of Excavator and Drain Works. All extra operations not included in the agreement will be carried out at the same rate and standards as required by United Plantations Berhad. The agreement signed and delivered by Deputy Group Manager and K Kxxxr Excxxxxor. The agreement is valid from 1 January 2024 to 31 December 2024 unless terminated earlier under Clause 8. | Complied |
| 4.6.4.3 | The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. | Stated in the agreement that the contractors are subject to any audits including verifications by the appointed third-party assurance body. | Complied |

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|-----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| | - Minor compliance - | | |
| 4.6.4.4 | <p>The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted.</p> <p>- Major compliance -</p> | Evident the listing of work done by K Kxxxr Excxxxxor for the month ended May 2024 and certificate of payment dated 31/05/2024, CP No:62240222 and MOA No:09326. The inspected, recommended or certified for payment have been made on 02/06/2024. | Complied |
| 4.7 Principle 7: Development of new planting | | | |
| Criterion 4.7.1: High biodiversity value | | | |
| 4.7.1.1 | <p>Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation.</p> <p>- Major compliance -</p> | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| 4.7.1.2 | <p>No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required.</p> <p>- Major compliance -</p> | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| Criterion 4.7.2: Peat Land | | | |

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|---------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|----------------|
| 4.7.2.1 | New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA) | | | |
| 4.7.3.1 | A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| 4.7.3.2 | SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| 4.7.3.3 | The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| 4.7.3.4 | Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |

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| Criterion 4.7.4: Soil and topographic information | | | |
| 4.7.4.1 | Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| 4.7.4.2 | Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils | | | |
| 4.7.5.1 | Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| 4.7.5.2 | Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| 4.7.5.3 | Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| Criterion 4.7.6: Customary land | | | |

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| 4.7.6.1 | No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| 4.7.6.2 | Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| 4.7.6.3 | Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| 4.7.6.4 | The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - Major compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| 4.7.6.5 | Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |

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| Criterion / Indicator | | Assessment Findings | Compliance |
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| 4.7.6.6 | A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| 4.7.6.7 | The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |
| 4.7.6.8 | Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance - | There is no development of new planting in the estate within the Business Unit. Hence, this indicator is not applicable. | Not Applicable |

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MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mills

| Criterion / Indicator | | Assessment Findings | Compliance |
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| 4.1 Principle 1: Management commitment & responsibility | | | |
| Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy | | | |
| 4.1.1.1 | Policy for the implementation of MSPO shall be established. - Major compliance - | <p>The United Plantations Berhad has established Malaysia Sustainable Palm Oil (MSPO) Policy signed by Dato' Carl Bek-Nielsen, Chief Executive Director dated 29/03/2018.</p> <p>Stated that, United Plantations Berhad shall adhere to the following key principles of MSPO to which management shall provide leadership and commitment:</p> <ul style="list-style-type: none"> • Management commitment and responsibility • Transparency • Compliance to legal requirements • Social responsibility, health, safety and employment conditions • Environment, natural resources, biodiversity and ecosystem services • Best practices • Development of new plantings <p>With the objectives such as:</p> <ul style="list-style-type: none"> • Comply with the laws and regulations of the countries, | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | <ul style="list-style-type: none"> • Maintain an open and dynamic approach towards continuous improvement in respect of social responsibilities, environment protection, best practices, and economic development, • Establish traceability within the supply chain as an important step towards production of sustainable palm oil products, • Strive to commit our employees, contractors, suppliers, trading partners and stakeholders to adhere to our company policies and cooperate with them in an ambition to find mutual improvements. <p>The policy was written in various language such as English, Bahasa Malaysia, Tamil, Bengali, Hindi, Nepali and Telegu based on the workers nationality such as Malaysian, Indonesian, Bangladeshi, Indian, and Nepalese.</p> <p>The company policies, RSPO and MSPO certification requirements have been communicated to all stakeholders as stated in the minutes meeting Stakeholders Dialogue Session with United Plantations Berhad dated 23/05/2024 was held at Community Hall, UIE Estate. The agenda includes Welcoming Speech, Briefing on Company Policy, briefing on SIA 'Risk Matrix', Joint Consultation on Social Impact Assessment (SIA), Briefing on EIA 'Risk Matrix', Joint Consultation on EIA, Joint Consultation on identification of HCV areas (if any) and Conservation Area, completion of stakeholder's questionnaires, question and answer session and closing. No comment from stakeholders. There is one question from SOCSO, Manjung Perak on whether the company provides work for OKU and the management answered yes, United Plantations Berhad will hire someone with Persons with Disabilities (PWD) conditions. Currently, UP BHD has one disabled employee at Jenderata Estate.</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | <p>Evident the attendance list that comprised of 58 attendees such as Canteen UIE, Mosque UIE, PDRM, Gender Committee, Kampung 4x Rxxxxi, SOCSO, Klinik Kesihatan, K. Kxxxxr Exxxxxxr, C. Nallxxxxam, Mill and Estate Gender representative, estate and mill manager, assistant manager and staff, Lembaga Air Perak, etc.</p> <p>The invitation has been sent between 9, 16 and 17 April 2024 to more than 28 employees and stakeholders.</p> <p>Evident the training record on policies to all workers such as Human Rights, Gender, Guest Workers/Foreign Workers, HCV Awareness, Whistleblower, CSR, publicly available documents, RSPO, MSPO, OSH and Biodiversity and Environment Policy during Muster Ground dated:</p> <ol style="list-style-type: none"> 1. UIE Estate (Estate 2) – 19/01/2024 2. UIE POM – 06/01/2024 | |
| 4.1.1.2 | <p>The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation.</p> <p>- Major compliance -</p> | <p>Stated that, United Plantations Berhad shall adhere to the following key principles of MSPO to which management shall provide leadership and commitment with the objectives such as:</p> <ul style="list-style-type: none"> • Comply with the laws and regulations of the countries, • Maintain an open and dynamic approach towards continuous improvement in respect of social responsibilities, environment protection, best practices, and economic development, • Establish traceability within the supply chain as an important step towards production of sustainable palm oil products, <p>Strive to commit our employees, contractors, suppliers, trading partners and stakeholders to adhere to our company policies and cooperate with them in an ambition to find mutual improvements.</p> | Complied |

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| Criterion 4.1.2 – Internal Audit | | | |
| 4.1.2.1 | Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance - | The management has established Internal Audit Standard Operating Procedures, rev. 01 dated 15/02/2019. Referred Section 2.0 stated the Internal Audit shall be conducted at least annually to implement and maintain the respective standard requirement effectively within the Group. Sighted the Internal Audit Plan in the Sustainability Internal Audit (First Round) titled Sustainability Internal Audits cum Reach & Teach, Reach & Remind Training 2024 dated 02/02/2024 including the proposed dated for Stakeholders Meeting. The audit plan was prepared by Human Resources and Sustainability & Safety (HRSS) Team in preparation for the MSPO and RSPO external audits in June and July 2024 as per following schedule: 1. UIE Estate – 20/02/2024 2. UIE POM – 21/02/2024 | Complied |
| 4.1.2.2 | The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance - | The management has established Internal Audit Standard Operating Procedures, rev. 01 dated 15/02/2019. Stated: 1. Any non-conformities found during an internal audit shall be issued summary of findings. 2. The Estate Managers/ Head of Department shall implement the correction and corrective action and revert to HRESH Department. Unannounced and/or follow-up audit will be carried out as deemed fit. 3. The findings raised during internal audit as well as external audits shall be deliberated during management review meeting which to be held in annual basis. | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | Evident the MSPO & RSPO Audit Report for UIE Palm Oil Mill dated 21/02/2024 with correction, corrective action, and area for improvement. The action plan has been sent to HRSS. | |
| 4.1.2.3 | Reports shall be made available to the management for their review. - Major compliance - | Evident the MSPO & RSPO Audit Report for UIE Palm Oil Mill dated 21/02/2024 with correction, corrective action, and area for improvement. The report has been submitted to the HRSS and carbon copy (cc) to the related department and to the Chief Executive Director of United Plantations Berhad and the Sustainability Management Review 2023 has been conducted on 23/05/2024. | Complied |
| Criterion 4.1.3 – Management Review | | | |
| 4.1.3.1 | The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance - | The management review meeting shall be held in annual basis to deliberate the findings raised during internal audit as well as external audits as stated in the procedure. The Sustainability Management Review 2023 has been conducted on 23/05/2024 at the UIE Estate Community Hall and the agenda as follows: 1. Applicable Laws and Regulations – Tracking of Laws 2. Business Plan (Annual Budget) 3. Environmental Impacts Assessment (EIA) 4. Energy Use – Diesel Use 5. Scheduled Waste Management 6. Social Impacts Assessment (SIA) 7. Stakeholders Communication and Consultations 8. Internal audit findings | Complied |

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| | | 9. External Audit findings 10. Continuous Improvement 11. Changes that could affect the management review 12. Follow up on previous management review | |
| Criterion 4.1.4 – Continual Improvement | | | |
| 4.1.4.1 | The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance - | The management has established continuous improvement plan based on a consideration of the main social and environmental impact. The plan was reviewed and monitored on annually basis. Among the plan as follows: 1. Domestic Water Usage (gallons per capita per day) – Monitoring of piping and repair work has been carried out. 2. Mill water usage (MT of Water per MT FFB) – To monitor operations and maintain current practices to maintain usage. 3. BOD of Palm Oil Mill Effluent (POME) – Regular desludging and monitoring is done to maintain reading. 4. Dust Emissions (VORSEP). 5. Volume of Methane Gas captured. 6. Status of amenities (repair and replacements). | Complied |
| 4.1.4.2 | The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance - | The new information, techniques, technology and or innovation equipment to improve practices were obtained mainly through information from communications with Government department, suppliers and being members of associations related to palm oil industry. Any new information on new technology will be forwarded to the Estate Director and Chief Executive Director for approval before any implementation. The new information is updated to | Complied |

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| | | <p>employees through morning briefings, memo, meetings, station training.</p> <p>Samples of new changes as referred to the Budget 2024 - Capital Expenditure on:</p> <ul style="list-style-type: none"> a. To replace 2 units Auger Conveyor – thinner and beyond economical repair compared to the previous auger. b. Infrastructure/Tarmac Road/Road Surface - from gravel road to Tarmac Road at Sungai Batu for 1.5km c. New Alfa Laval Decanter as per budget 31/12/2023 | |
| 4.2 Principle 2: Transparency | | | |
| Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements | | | |
| 4.2.1.1 | <p>The management shall communicate adequate information to other stakeholder on environmental, social, and legal issues relevant to sustainable practices in the relevant languages and forms.</p> <p>- Major compliance -</p> | <p>United Plantations Berhad uses the company web page (https://unitedplantations.com/sustainability/) to communicate public information relevant to sustainable practice to the stakeholders. Information on sustainability among others as listed below:</p> <ul style="list-style-type: none"> i. Company commitments ii. Certifications / policies / employee iii. Environment, community iv. Marketplace were available on the website. <p>In addition, the management is committed in communicating adequate information to the stakeholders via session in the stakeholders meeting. Details as shown in 4.2.2.3. Records of attendance and minutes was sighted and verified.</p> | Complied |

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| 4.2.1.2 | <p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p> | <p>United Plantations Berhad publishes information via various means as indicated below:</p> <ul style="list-style-type: none"> i. Website www.unitedplantations.com ii. Notice boards iii. Annual report / Brochure iv. Approach to the management <p>A Policy has established on "Documents That Can Be Publicly Made Available" signed by the Chief Executive Director dated 11/01/2014 stating that the company is committed to transparency. The documents which are the publicly available on request among others as listed below:</p> <ul style="list-style-type: none"> i. Land titles/user rights ii. Occupational health and safety plans /Policies iii. Plans and impacts assessments of environment /social iv. HCV documentations v. Pollution prevention and reduction plans vi. Complaints & grievances / Negotiation procedures vii. Continual improvement plans viii. Public summary of certification assessment report | Complied |
| Criterion 4.2.2 – Transparent method of communication and consultation | | | |
| 4.2.2.1 | <p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p> | <p>United Plantations Berhad has established a procedure titled "Standard of Procedure – Stakeholder Engagement dated 09/04/2021. Therein describing details in relation to:</p> <ul style="list-style-type: none"> i. Responsibility | Complied |

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| | | <p>ii. Procedure for internal communication</p> <ul style="list-style-type: none"> - Weekly /monthly assembly - Internal circular/memo - Notice board - MSPO meeting - Employer to employee's suggestion box - Employee's representative <p>iii. External communication</p> <ul style="list-style-type: none"> - Contact no of important department - Display at prominent places. <p>In addition, there was also a Grievance Redressal Procedure for consultation and communication with relevant stakeholders documented in the Handbook for Employees and Stakeholders.</p> <p>i. The handbooks are handed and briefed to the workers and stakeholders during workers induction and stakeholders' consultation meetings.</p> <p>ii. The procedure was also displayed in the company website.</p> <p>The procedure stated the steps and timeframe adapted by the management to manage issues raised by the internal and external stakeholders. The document was sighted and verified.</p> | |
| 4.2.2.2 | <p>The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i>.</p> <p>- Minor compliance -</p> | <p>The Mill management appoints the Resident Engineer as Officer in-Charge of MSPO via letter dated 01/04/2021 signed by the Chief Executive Director. Duties among others include MSPO documentation management and matters relating to transparency.</p> | Complied |

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| 4.2.2.3 | <p>A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained.</p> <p>- Major compliance -</p> | <p>All relevant stakeholders have been listed in the UIE Engineering Department Stakeholder List reviewed dated 12/02/2024 comprises of 46 people The list of stakeholders was categorized under Government Agencies, Non-Governmental Organization (NGO), Service Providers/ Contractors/ Suppliers, Neighbouring Community/ Plantations/ Smallholders, Estate Community/ Estate Representatives. Details as listed below:</p> <table><tr><td>Classification</td><td>No</td><td>%</td></tr><tr><td>Government Agencies</td><td>17</td><td>36.00</td></tr><tr><td>- MPOB/ KPDNKK/ PDRM/ Immigration</td><td></td><td></td></tr><tr><td>Local Community/ Smallholders</td><td>4</td><td>8.00</td></tr><tr><td>Suppliers/ Contractors</td><td>13</td><td>28.00</td></tr><tr><td>NGO</td><td>4</td><td>8.60</td></tr><tr><td>Estate Communities/ Representative</td><td>8</td><td>17.40</td></tr><tr><td>Total</td><td>46</td><td>100.00</td></tr></table> <p>A Stakeholder meeting was held on 23/04/2024 attended by 58 participants. The agenda discussed as follows:</p> <ul style="list-style-type: none">i. Awareness UPB Policies Briefingii. SIA briefing Risk Matrix/ Joint Consultationiii. EIA Consultation/ HCV/ Conservation Pricesiv. Questionnaires sessions for Stakeholders <p>Issues among others highlighted were whether the individual with OKU (Orang Kurang Upaya) status be given opportunity in UPB employment and reply was in affirmative. There is no major issue highlighted during the meeting.</p> | Classification | No | % | Government Agencies | 17 | 36.00 | - MPOB/ KPDNKK/ PDRM/ Immigration | | | Local Community/ Smallholders | 4 | 8.00 | Suppliers/ Contractors | 13 | 28.00 | NGO | 4 | 8.60 | Estate Communities/ Representative | 8 | 17.40 | Total | 46 | 100.00 | Complied |
| Classification | No | % | | | | | | | | | | | | | | | | | | | | | | | | | |
| Government Agencies | 17 | 36.00 | | | | | | | | | | | | | | | | | | | | | | | | | |
| - MPOB/ KPDNKK/ PDRM/ Immigration | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Local Community/ Smallholders | 4 | 8.00 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Suppliers/ Contractors | 13 | 28.00 | | | | | | | | | | | | | | | | | | | | | | | | | |
| NGO | 4 | 8.60 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Estate Communities/ Representative | 8 | 17.40 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 46 | 100.00 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criterion 4.2.3 – Traceability | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| 4.2.3.1 | <p>The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.</p> <p>- Major compliance -</p> | <p>An SOP has been established Standard Operating Procedures</p> <ul style="list-style-type: none"> i. MSPO Supply Chain Model Segregation) (RSPO Supply Chain Module D – CPO Mills. Identity Preserved) Revision No. 10 dated 01/10/2022 ii. Traceability rev. no. 01 dated 15/02/2019. <p>Therein describing information of:</p> <ul style="list-style-type: none"> i. FFB flow chart from estates harvesting designated block to mill weighbridge (tickets) with information of date of harvest / Gang number / Field number / RSPO and MSPO Certificate no. and expiry date ii. The mill processing records the total FFB processed for the day and the storage tank no being stored. iii. The records include opening FFB balances in ramp and cages plus the FFB intake from the estates for the day less the closing FFB balances will provide the total processed. iv. The despatch oil from the storage tank follows a similar formula opening stock plus production less the despatch volume will give a closing stock for the day record. <p>All records of CPO tank sounding are recorded during the closing of the day's processing.</p> | Complied |
| 4.2.3.2 | <p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p>- Major compliance -</p> | <p>United Plantations Berhad has established a Standard Operating Procedures – Traceability, rev. no. 01, dated 15/02/2019.</p> <p>Therein under clause 15.3 the responsibility stated that the HRSS team will conduct verification on the traceability process and ensure the accuracy of the daily and monthly records. Sessions are made in the annual internal audit latest being on 21/02/2024.</p> | Complied |

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| 4.2.3.3 | The management shall identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance - | The Management appointed the Resident Engineer as Officer in-Charge of MSPO as well as traceability and supply chain via letter dated 01/04/2021 issued by the Chief Executive Director. The appointment letter was sighted and verified. | Complied | | | | | |
| 4.2.3.4 | Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance - | <p>The mill maintained the records of CPO and CPK deliveries. The details for the consignment comprise of the following:</p> <p>i) Crude Palm Oil – CPO</p> <ul style="list-style-type: none">- The name and address of the seller/buyer:- Product(s) identification including the supply chain models CPO Crude Palm Oil- The quantity of the products delivered- The loading or delivery date- Related transportation documentation with a unique identification number <p>ii) Crude Palm Kernel despatches</p> <ul style="list-style-type: none">- Name / address of the seller/buyer- Product(s) identification including the supply chain models (segregation): S-PK Palm Kernel- Quantity of the products delivered- Loading or delivery date- Related transportation documentation with a unique identification number- MSPO certificate no and certificate validity <p>The following despatches was sampled and verified.</p> <table><tr><td>Ticket no</td><td>Date</td><td>Produce</td><td>mt</td><td>Buyer</td></tr></table> | Ticket no | Date | Produce | mt | Buyer | Complied |
| Ticket no | Date | Produce | mt | Buyer | | | | |

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| | | 205810 | 27/06/2024 | CPO | 40.41 | Unitata Berhad | | | | | | | | | | | | | | | | |
| | | 203883 | 28/05/2024 | CPO | 41.13 | Unitata Berhad | | | | | | | | | | | | | | | | |
| | | 197351 | 15/02/2024 | CPO | 40.90 | Unitata Berhad | | | | | | | | | | | | | | | | |
| | | 205748 | 26/06/2024 | CPK | 17.63 | United Fleet Palms | | | | | | | | | | | | | | | | |
| | | 203892 | 28/05/2024 | CPK | 36.48 | United Fleet Palms | | | | | | | | | | | | | | | | |
| | | 182491 | 17/06/2023 | CPK | 30.64 | United Fleet Palms | | | | | | | | | | | | | | | | |
| 4.3 Principle 3: Compliance to legal requirements | | | | | | | | | | | | | | | | | | | | | | |
| Criterion 4.3.1 – Regulatory requirements | | | | | | | | | | | | | | | | | | | | | | |
| 4.3.1.1 | All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance - | The management has established mechanism to ensure the compliance to legal requirement. The management also ensured that all necessary licenses and permits were obtained and renewed in accordance with legal requirements, meticulously documenting these actions in the file system. Sighted the evidence: Details information on the license & permit with validity: <table><tr><td>Permit / License</td><td>Serial No & Validity Date</td></tr><tr><td>MPOB License</td><td>500124504000 31/01/2025</td></tr><tr><td>DOE License</td><td>004239 30/06/2024</td></tr><tr><td>Diesel Permit</td><td>MJG/SK/D/04 24/08/2024</td></tr><tr><td>Genset Permit</td><td>2023/023428 20/10/2024</td></tr><tr><td>Boiler No 2</td><td>PMD 3869 01/08/2025</td></tr><tr><td>Sterilizer No 2</td><td>PK PMT 6254</td></tr></table> | | | | | | Permit / License | Serial No & Validity Date | MPOB License | 500124504000 31/01/2025 | DOE License | 004239 30/06/2024 | Diesel Permit | MJG/SK/D/04 24/08/2024 | Genset Permit | 2023/023428 20/10/2024 | Boiler No 2 | PMD 3869 01/08/2025 | Sterilizer No 2 | PK PMT 6254 | Complied |
| Permit / License | Serial No & Validity Date | | | | | | | | | | | | | | | | | | | | | |
| MPOB License | 500124504000 31/01/2025 | | | | | | | | | | | | | | | | | | | | | |
| DOE License | 004239 30/06/2024 | | | | | | | | | | | | | | | | | | | | | |
| Diesel Permit | MJG/SK/D/04 24/08/2024 | | | | | | | | | | | | | | | | | | | | | |
| Genset Permit | 2023/023428 20/10/2024 | | | | | | | | | | | | | | | | | | | | | |
| Boiler No 2 | PMD 3869 01/08/2025 | | | | | | | | | | | | | | | | | | | | | |
| Sterilizer No 2 | PK PMT 6254 | | | | | | | | | | | | | | | | | | | | | |

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| | | | 01/08/2025 | |
| | | Crane No 2 | PMA 35015 01/08/2025 | |
| | | Air Receiver | PK PMT 3835 01/08/2025 | |
| | | Air Compressor | PK PMT 83584 01/08/2025 | |
| | | Abstraction License | 2024-0001 31/12/2025 | |
| | | Details information on the competency license with validity: | | |
| | | Permit / License | Register Date | |
| | | Steam Engineer | 072/2016 16/04/2016 | |
| | | Boilerman 1 | Pk 61/95 29/08/1995 | |
| | | Boilerman 2 | PK 52/95 14/07/1995 | |
| | | Chargeman | PJ10903193 14/02/2012 | |
| | | MPOB Grader | TE2562019 22/10/2019 | |
| | | AESP | NW-NRO-AE-R2340-W 10/06/2026 | |
| | | AGT | AGT327191-23 18/05/2023 | |
| | | CEPSWAM | 04202 16/12/2020 | |
| | | CEPPOME | 2424100 | |

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|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|----------------------------|-----------------|----------------------------|--------|----------|--|----------|
| | | <table><tr><td></td><td>11/01/2024</td></tr><tr><td>OSH Coordinator</td><td>OSHC/2023-24 20/01/2023</td></tr></table> <p>The management has done the payment of renewal DOE License. Sighted the payment voucher on 15/06/2024. Currently status waiting the new license from DOE.</p> | | 11/01/2024 | OSH Coordinator | OSHC/2023-24 20/01/2023 | | | | |
| | 11/01/2024 | | | | | | | | | |
| OSH Coordinator | OSHC/2023-24 20/01/2023 | | | | | | | | | |
| 4.3.1.2 | The management shall list all relevant laws related to their operations in legal requirements register. - Major compliance - | <p>The management has established the list of legal register. It was observed the list are updated when any new amendment or any new regulation. The list is listed the Act, Regulation and Industrial code of practice. List of Legal Register being updated for their reference. Sighted the evidence:</p> <p>Details information on List of Legal Register:</p> <table><tr><td>Document</td><td>Legal Requirement Register</td></tr><tr><td>Date Review</td><td>11/03/2024</td></tr></table> | Document | Legal Requirement Register | Date Review | 11/03/2024 | | Complied | | |
| Document | Legal Requirement Register | | | | | | | | | |
| Date Review | 11/03/2024 | | | | | | | | | |
| 4.3.1.3 | The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance - | <p>The management has established the list of legal register. It was observed the list are updated when any new amendment or any new regulation. The list is listed the Act, Regulation and Industrial code of practice. List of Legal Register being updated for their reference. Sighted the evidence:</p> <p>Details information on List of Legal Register:</p> <table><tr><td>Document</td><td>Legal Requirement Register</td></tr><tr><td>Date Review</td><td>11/03/2024</td></tr><tr><td>Status</td><td>Updated</td></tr></table> | Document | Legal Requirement Register | Date Review | 11/03/2024 | Status | Updated | | Complied |
| Document | Legal Requirement Register | | | | | | | | | |
| Date Review | 11/03/2024 | | | | | | | | | |
| Status | Updated | | | | | | | | | |
| 4.3.1.4 | The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. | Legal compliance requirements, tasked with the responsibilities of monitoring and keeping permits and licenses up to date, as well as staying informed about any changes in laws and regulations. | | Complied | | | | | | |

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| | - Minor compliance - | Details information on the appointment letter of PIC Legal: <table><tr><td>Document</td><td>Appointment Letter PIC</td></tr><tr><td>Date Review</td><td>01/04/2021</td></tr><tr><td>PIC Name</td><td>Mr. N. Saravanaganes</td></tr></table> | | Document | Appointment Letter PIC | Date Review | 01/04/2021 | PIC Name | Mr. N. Saravanaganes | | | | | | | | | |
| Document | Appointment Letter PIC | | | | | | | | | | | | | | | | | |
| Date Review | 01/04/2021 | | | | | | | | | | | | | | | | | |
| PIC Name | Mr. N. Saravanaganes | | | | | | | | | | | | | | | | | |
| Criterion 4.3.2 – Lands use rights | | | | | | | | | | | | | | | | | | |
| 4.3.2.1 | The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance - | The mill located within the estate land area. The mill has ensured the oil palm milling activities do not diminish the land use rights of other users. No issues of land dispute issue occurred in the mill that involved other land user rights. | | Complied | | | | | | | | | | | | | | |
| 4.3.2.2 | The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance - | The management has provided evidence of the company’s legal ownership of the estate land. Verified that land title. The copies of land titles were available. Sighted the evidence: <table><tr><td>Document</td><td>Pajakan Negeri</td></tr><tr><td>Reference No</td><td>1xxxxx3</td></tr><tr><td>Lot No</td><td>11444</td></tr><tr><td>Lot Size</td><td>3835 Ha</td></tr><tr><td>Category</td><td>Agriculture</td></tr><tr><td>Land Status</td><td>Kelapa Sawit</td></tr><tr><td>Landowner</td><td>United Plantations Berhad</td></tr></table> | | Document | Pajakan Negeri | Reference No | 1xxxxx3 | Lot No | 11444 | Lot Size | 3835 Ha | Category | Agriculture | Land Status | Kelapa Sawit | Landowner | United Plantations Berhad | Complied |
| Document | Pajakan Negeri | | | | | | | | | | | | | | | | | |
| Reference No | 1xxxxx3 | | | | | | | | | | | | | | | | | |
| Lot No | 11444 | | | | | | | | | | | | | | | | | |
| Lot Size | 3835 Ha | | | | | | | | | | | | | | | | | |
| Category | Agriculture | | | | | | | | | | | | | | | | | |
| Land Status | Kelapa Sawit | | | | | | | | | | | | | | | | | |
| Landowner | United Plantations Berhad | | | | | | | | | | | | | | | | | |
| 4.3.2.3 | Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance - | The mill is located within the estate land title. Fencing parameters established around the mill building complex to separate the management boundary of estate and the mill. The housing and other recreational facilities are located within the same vicinity for ease of employees’ management. | | Complied | | | | | | | | | | | | | | |

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| 4.3.2.4 | Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance - | No issues of land dispute issue occur in the mill as well as all estates that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted onsite confirmed the information. | Not Applicable |
| Criterion 4.3.3 – Customary rights | | | |
| 4.3.3.1 | Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance - | There is no evidence that the land on which the Mill is situated is encumbered by customary rights. | Not Applicable |
| 4.3.3.2 | Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance - | There is no evidence that the land on which the Mill is situated is encumbered by customary rights. | Not Applicable |
| 4.3.3.3 | Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance - | There is no evidence that the land on which the Mill is situated is encumbered by customary rights. | Not Applicable |
| 4.4 Principle 4: Social responsibility, health, safety and employment condition | | | |
| Criterion 4.4.1: Social Impact Assessment (SIA) | | | |
| 4.4.1.1 | Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance - | The management has established the Social Impact Assessment (SIA) 2024 that covered the following topics and the latest review for UIE Estate was 23/05/2024: | Complied |

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| | | <ol style="list-style-type: none"> 1. Access and use rights 2. Economic livelihoods and working conditions 3. Subsistence activities/amenities 4. Human rights 5. Cultural and religious values 6. Medical & health facilities 7. Operational Activities: Nursery, Replanting, Weeding and P&D Management, Pruning, Circle Sanitation, EFB Mulching, Water Management, Road/Paths/Railways, Manuring, Harvesting, Mill Drain Connecting to Estate, Composting Pit and Linesite Water Discharge <p>Part of the negative impacts being assessed with appropriate action plan and low or medium significance such as:</p> <ol style="list-style-type: none"> 1. Conflicts with stakeholder over boundary 2. Non-conformance to land title (if there is any land dispute cases) 3. Smallholders/outsideers passing through estate 4. Contract 5. Turnover of guest worker 6. Permit and passport 7. Suicide cases <p>The latest Social and Environmental Impact Assessment (SEIA) for Internal Stakeholder where a survey and study had been carried out on 10/06/2024 on 102 respondents which were randomly picked from the employees in United International Enterprise (UIE)</p> | |

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| | | <p>Complex. The purpose of this study is to measure and to understand both positive and negative social impacts of the estate operations towards the workplace. The social impact study will be reviewed annually during management review.</p> <p>The graphical representation based on workers categories based on:</p> <ol style="list-style-type: none"> 1. Gender: 6% female and 94% male 2. Nationality: 32% Indian, 17% Indonesia, 43% Bangladeshi, 1% Nepali and 7% Malaysian. <p>The sets questionnaires which are divided into:</p> <ol style="list-style-type: none"> 1. Housing and Amenities <ul style="list-style-type: none"> - Positive impact – utilities provided, management response towards housing and amenities issue, road conditions, awareness on road maintenance. 2. Occupational Safety and Health <ul style="list-style-type: none"> - Positive impact – PPE, work safety, equipment provided, medical facilities, awareness on SOCSO, Covid 19 preventive 3. Environmental Pollution <ul style="list-style-type: none"> - Positive impact – pollution caused by operations, effect of sound from operation, domestic waste collection and disposal, quality of waterways, smells and strong odours from operations, environmental impact, awareness on management climate change initiatives, 4. Religious and Educational Amenities | |

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| | | <ul style="list-style-type: none"> - Positive impact – religious amenities, school going children <p>5. Code of conduct</p> <ul style="list-style-type: none"> - Positive impact - awareness on compliance to the Malaysian anti-corruption MACC Act <p>6. Other</p> <ul style="list-style-type: none"> - Positive impact - awareness on company sustainability policies. <p>Latest Social and Environment Impact Assessment (SEIA) for External Stakeholders where a survey and study has been carried out on 23/04/2024 during Stakeholder Consultation on 6 respondents who responded to the questionnaire provided by United Plantations Berhad. The purpose of this study is to measure and to understand both positive and negative social impacts of the estate operations towards the surrounding stakeholders.</p> <p>The graphical representation based on workers categories based on:</p> <ol style="list-style-type: none"> 1. Gender: 22% female and 78% male 2. Stakeholder: 11% NGO, 56% Government Agencies, and 33% Contractor/Supplier. <p>The sets questionnaires which are divided into:</p> <ol style="list-style-type: none"> 1. Preventive measures for C19 <ul style="list-style-type: none"> - Positive impact – suggestions/requests/ complaints based on UP's operations 2. Environmental pollution <ul style="list-style-type: none"> - Positive impact – environmental impacts caused by Estate and Mill operations | |

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| | | 3. Religious and educations 4. Code of conduct 5. Human rights <ul style="list-style-type: none"> - Positive impact - awareness on mgt initiatives in human rights 6. Other <ul style="list-style-type: none"> - Positive impact - environmental impacts caused by estates and or mill operations Based on the conclusion, there were positive and negative impacts highlighted according to the responses received. The management will endeavour to resolve any negative impacts. The social impact study will be reviewed annually during management review. | |
| Criterion 4.4.2: Complaints and grievances | | | |
| 4.4.2.1 | A system for dealing with complaints and grievances shall be established and documented. - Major compliance - | The management has established the Grievance Redressal Procedure for Internal and External Stakeholder. The company Secretary of United Plantations Berhad will be responsible for the handling enquires and grievances against the Company. The stakeholder may lodge any enquires/grievances to the respective Estate or Palm Oil Mill Manager or direct to the Company Secretary | Complied |
| 4.4.2.2 | The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance - | The system to resolve the disputes or grievances has been outline in the Grievance Redressal Procedure and the summary as below: 1. Internal Stakeholder <ul style="list-style-type: none"> - Step 1 – within 7 working days of a grievance arising, the employee concerned shall raise the grievance with supervisory staff and shall be given opportunity to be | Complied |

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| | | <p>accompanied by not more than two members of the NUPW estate or mill committee/ Foreign Worker Welfare Committee/employee itself.</p> <ul style="list-style-type: none"> - Step 2 – If not settled within a further 7 working days, the NUPW estate or mill committee shall make formal representation to the estate or mill in writing. On receipt on NUPW'S letter, the estate or mill, will offer arrangement for a meeting between management representative and NUPW representatives not more than two members. The meeting shall be held within 7 working days of letter received. - Step 3 – If remains unsettled, the grievance shall then be discussed between the management & representative and NUPW representative and employee himself within a further period of 10 working days. - Step 4 – If the matter still remains unsettled, is shall then be dealt with under the provision of the Industrial Relations Act, 1976 or the Employment Act, 1955. <p>2. External Stakeholder</p> <ul style="list-style-type: none"> - Grievance received from stakeholder by the estate or mill management/head of department/company secretary, - Then, the grievance formally recorded and settled as soon as possible, - Then, if the matter remains unsettled at the estate or mill level, the estate or mill manager to forward to the company secretary, | |

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| | | <ul style="list-style-type: none"> - Then, grievance acknowledge by letter within 7 working days to stakeholder and estate or mill manager, - Then, grievance presented to United Plantations Berhad Executive Committee to be reviewed, - Then, action taken to be taken is recorded and stakeholder informed, - Then, progress reviewed by United Plantations Berhad Executive until resolution, - Then, outcome of the resolution is documented, and the stakeholder informed officially by company secretary, - Should the outcome not be resolved to mutual satisfaction of the stakeholder and United Plantations Berhad, it shall be dealt under the provisions of the Malaysian Legal Appeals Procedure and stakeholder informed accordingly. <p>The procedure was documented in the Handbook for Employees and Stakeholders. Evident also the slide presentation briefed to employees on the flow of the Grievance procedure (report to mandore>field supervisor/clerk/assistant manager>manager>HRSS>EXCOM>Labour Department) and telephone number for guest or foreign worker under HRSS:</p> <ol style="list-style-type: none"> 1. Bangladesh - +6013-8334101 2. India - +6019-2573699 3. Indonesia - +6013-8684101 | |

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| | | <p>Reviewed the Stakeholder Log Records for UIE (M) Sdn Bhd and the evident of the action taken was sampled as below:</p> <p>1. External Stakeholder:</p> <ul style="list-style-type: none"> - Invitation from Sg Wxxxi/Sogxxana Estate to attend Stakeholder Consultation scheduled on 20/06/2024 that has been received on 10/06/2024. The management approved to sent representative from UIE (M) Berhad. - Invitation letter dated 26/02/2024 from Pxxxxe Stxxxon Manjung to attend invitation to the opening and closing ceremony of the Perak KP Hero Cup Football Tournament 2024 planned on 01/03/2024 at 'Stadium Majlis Perbandaran Manjung' (MPM). The management has replied to the letter on 27/02/2024. - Request from Mxxxxs Anxxxtan Texxxra Malaysia on 19/01/2024 to use estate building/area for the purpose of carrying out the operation. The request has been approved on 27/02/2024. <p>2. Internal Stakeholder</p> <ul style="list-style-type: none"> - Request from UIE Palm Oil Mill worker to use the company's transport for daughter schooling on 30/03/2024 has been approved on the same day by the Senior Manager, Estate 1. - Request dated 16/12/2022 from UIE Palm Oil Mill staff for mill to provide transport from January 2023 to March 2023 for her son. The approval has been given on 21/12/2022 and acknowledged by the staff on the same day. | |

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| | | <ul style="list-style-type: none"> - Request from House No.: SQ32 at UIE Palm Oil Mill on 02/01/2024 to change 3 points bulb and to check the point power. The repaired has been conducted on the same day and acknowledged by the occupant. | |
| 4.4.2.3 | <p>A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.</p> <p>- Minor compliance -</p> | <p>The stakeholder's logbook form is made available in the office. The workers or stakeholders may request the form from the office personnel when needed. In case the complainant would want to make an anonymity, they can email to the company secretary. This information is available in United Plantations Berhad website and suggestion box in the office.</p> | Complied |
| 4.4.2.4 | <p>Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.</p> <p>- Minor compliance -</p> | <p>The Grievance Redressal Procedure for consultation and communication with relevant stakeholders was documented in the Handbook for Employees and Stakeholders.</p> <ol style="list-style-type: none"> 1. The handbooks are handed and briefed to the workers and stakeholders during workers induction and stakeholders' consultation meetings. 2. The procedure was also available in the company website. <p>The company policies, RSPO and MSPO certification requirements have been communicated to all stakeholders as stated in the minutes meeting Stakeholders Dialogue Session with United Plantations Berhad dated 23/05/2024.</p> <p>Evident the training record on policies to all workers such as Human Rights, Gender, Guest Workers/Foreign Workers, HCV Awareness, Whistleblower, CSR, publicly available documents, RSPO, MSPO, OSH and Biodiversity and Environment Policy during Muster Ground dated:</p> <ol style="list-style-type: none"> 1. UIE Estate (Estate 2) – 19/01/2024 | Complied |

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| | | 2. UIE POM – 06/01/2024. | | | | | | | | | | | | | | | | | | | | | | | |
| 4.4.2.5 | Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance - | Evident the complaint recorded as per 4.2.2.2 for the past 24 months in stakeholder’s logbook, government visit logbook and communication letter of request were available during audit. | Complied | | | | | | | | | | | | | | | | | | | | | | |
| Criterion 4.4.3: Commitment to contribute to local sustainable development | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.4.3.1 | Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance - | <div>Evident the Social Commitment of the Group for the year 2023 in the Annual Report:</div> <table><tr><th>Contributions 2023</th><th>(RM)</th></tr><tr><td>Hospital & Medicine for Employees, Dependents & Nearby Communities</td><td>4,371,488</td></tr><tr><td>Education Benevolent Fund *</td><td>1,025,283</td></tr><tr><td>Education, Welfare, Scholarships & Other</td><td>280,754</td></tr><tr><td>Bus Subsidy for School Children</td><td>211,065</td></tr><tr><td>External Donations</td><td>748,563</td></tr><tr><td>New Infrastructure-Road, TNB and water supply for domestic use</td><td>289,462</td></tr><tr><td>Employee Housing</td><td>7,793,775</td></tr><tr><td>Infrastructure Projects, Buildings, Community Halls, Places of Worship</td><td>2,309,937</td></tr><tr><td>Provision of Social Amenities</td><td>5,463,124</td></tr><tr><td>Total</td><td>22,493,451</td></tr></table> <div>The above payments are in addition to the regulatory contributions by the Group to the Employees’ Provident Fund, Social Security Contributions, and other benefits.</div> <div>Also sighted the request for contributions as below:</div> | Contributions 2023 | (RM) | Hospital & Medicine for Employees, Dependents & Nearby Communities | 4,371,488 | Education Benevolent Fund * | 1,025,283 | Education, Welfare, Scholarships & Other | 280,754 | Bus Subsidy for School Children | 211,065 | External Donations | 748,563 | New Infrastructure-Road, TNB and water supply for domestic use | 289,462 | Employee Housing | 7,793,775 | Infrastructure Projects, Buildings, Community Halls, Places of Worship | 2,309,937 | Provision of Social Amenities | 5,463,124 | Total | 22,493,451 | Complied |
| Contributions 2023 | (RM) | | | | | | | | | | | | | | | | | | | | | | | | |
| Hospital & Medicine for Employees, Dependents & Nearby Communities | 4,371,488 | | | | | | | | | | | | | | | | | | | | | | | | |
| Education Benevolent Fund * | 1,025,283 | | | | | | | | | | | | | | | | | | | | | | | | |
| Education, Welfare, Scholarships & Other | 280,754 | | | | | | | | | | | | | | | | | | | | | | | | |
| Bus Subsidy for School Children | 211,065 | | | | | | | | | | | | | | | | | | | | | | | | |
| External Donations | 748,563 | | | | | | | | | | | | | | | | | | | | | | | | |
| New Infrastructure-Road, TNB and water supply for domestic use | 289,462 | | | | | | | | | | | | | | | | | | | | | | | | |
| Employee Housing | 7,793,775 | | | | | | | | | | | | | | | | | | | | | | | | |
| Infrastructure Projects, Buildings, Community Halls, Places of Worship | 2,309,937 | | | | | | | | | | | | | | | | | | | | | | | | |
| Provision of Social Amenities | 5,463,124 | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 22,493,451 | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <div>1. Request from 'Kelab Guru dan Kakitangan' (KGKT), Sekolah Kebangsaan Gelong Gajah dated 31/07/2024 to apply for donations or allocations for the Independence Month and Malaysia Day 2023 Celebration Programme. The mill management has approved to donate RM100 on 04/08/2024 and acknowledged by the school 23/08/2024.</div> <div>2. Invitation letter dated 26/02/2024 from Police Station Manjung to attend invitation to the opening and closing ceremony of the Perak KP Hero Cup Football Tournament 2024 planned on 01/03/2024 at 'Stadium Majlis Perbandaran Manjung' (MPM) and request for donation. The management has replied to the letter and approved to donate RM300 on 27/02/2024 and has been acknowledged on 06/03/2024.</div> | | | | | | | | | | | |
| Criterion 4.4.4: Employees safety and health | | | | | | | | | | | | | |
| 4.4.4.1 | An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. - Major compliance - | <div>The management has established an occupational safety and health policy. The policy has effectively communicated and implemented. Sighted the policy has display at notice board to give information to all employee and stakeholder. Sighted the evidence:</div> <table><tr><td>Document</td><td>Occupational Safety & Health Policy</td></tr><tr><td>Date</td><td>08/03/2021</td></tr><tr><td>Signed By</td><td>Chief Executive Officer</td></tr></table> <div>The management also has done training on safety policy through morning master briefing and training section. Sighted the evidence:</div> <table><tr><td>Document</td><td>Training Record</td></tr><tr><td>Date</td><td>06/01/2024</td></tr></table> | Document | Occupational Safety & Health Policy | Date | 08/03/2021 | Signed By | Chief Executive Officer | Document | Training Record | Date | 06/01/2024 | Complied |
| Document | Occupational Safety & Health Policy | | | | | | | | | | | | |
| Date | 08/03/2021 | | | | | | | | | | | | |
| Signed By | Chief Executive Officer | | | | | | | | | | | | |
| Document | Training Record | | | | | | | | | | | | |
| Date | 06/01/2024 | | | | | | | | | | | | |

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| 4.4.4.2 | The occupational safety and health plan should cover the following: | a) The management has established an occupational safety and health policy. The policy has effectively communicated and implemented. Sighted the policy has display at notice board to give information to all employee and stakeholder. Sighted the evidence: | OFI | | | | | | | | |
| | a) A safety and health policy, which is communicated and implemented. | <table><tr><td>Document</td><td>Occupational Safety & Health Policy</td></tr><tr><td>Date</td><td>08/03/2021</td></tr><tr><td>Signed By</td><td>Chief Executive Officer</td></tr><tr><td>Policy Training</td><td>06/01/2024</td></tr></table> | | Document | Occupational Safety & Health Policy | Date | 08/03/2021 | Signed By | Chief Executive Officer | Policy Training | 06/01/2024 |
| | Document | Occupational Safety & Health Policy | | | | | | | | | |
| | Date | 08/03/2021 | | | | | | | | | |
| | Signed By | Chief Executive Officer | | | | | | | | | |
| | Policy Training | 06/01/2024 | | | | | | | | | |
| | b) The risk of all operations shall be assessed and documented. | b) The management has established the risk for the operation. All the risk assessment has documented and monitored. Sighted the evidence: | | | | | | | | | |
| | c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: | <table><tr><td>Assessment</td><td>Description</td></tr><tr><td>HIRARC</td><td>HIRARC has established on 10/02/2022 and it was documented. Latest review will be on 10/02/2025. The HIRARC was done assessment to all station in the mill such as processing area, store and facilities area. All type of hazard was identified, and risk control are measured.</td></tr><tr><td>CHRA</td><td>CHRA Report (Chemical Health Risk Assessment) has been established by certified assessor with reference HQ/08/ASS/00/250-2020/026 and dated 09/08/2020. The assessment was done at 6 work unit that exposed with chemical.</td></tr><tr><td>Medical Surveillance</td><td>Medical Surveillance has been conducted for individuals exposed to chemical specifically</td></tr></table> | | Assessment | Description | HIRARC | HIRARC has established on 10/02/2022 and it was documented. Latest review will be on 10/02/2025. The HIRARC was done assessment to all station in the mill such as processing area, store and facilities area. All type of hazard was identified, and risk control are measured. | CHRA | CHRA Report (Chemical Health Risk Assessment) has been established by certified assessor with reference HQ/08/ASS/00/250-2020/026 and dated 09/08/2020. The assessment was done at 6 work unit that exposed with chemical. | Medical Surveillance | Medical Surveillance has been conducted for individuals exposed to chemical specifically |
| | Assessment | Description | | | | | | | | | |
| | HIRARC | HIRARC has established on 10/02/2022 and it was documented. Latest review will be on 10/02/2025. The HIRARC was done assessment to all station in the mill such as processing area, store and facilities area. All type of hazard was identified, and risk control are measured. | | | | | | | | | |
| CHRA | CHRA Report (Chemical Health Risk Assessment) has been established by certified assessor with reference HQ/08/ASS/00/250-2020/026 and dated 09/08/2020. The assessment was done at 6 work unit that exposed with chemical. | | | | | | | | | | |
| Medical Surveillance | Medical Surveillance has been conducted for individuals exposed to chemical specifically | | | | | | | | | | |
| i. All employees involved are adequately trained on safe working practices; | | | | | | | | | | | |
| ii. All precautions attached to products should be properly observed and applied; | | | | | | | | | | | |
| d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). | | | | | | | | | | | |
| e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. | | | | | | | | | | | |
| f) The management shall appoint responsible person(s) for workers’ safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements. | | | | | | | | | | | |
| g) The management shall conduct regular two-way communication with their employees where issues that affect their business | | | | | | | | | | | |

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| | such as those related to employees’ safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded. | | workers at laboratory and kernel plant. The medical surveillance report, produced on 29/02/2024. The result all workers examined are fit to work. | |
| | h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. | NRA | Noise Risk Assessment (NRA) Report was established by certified assessor with reference HQ/07/PEB/00/74 and dated 07/03/2020. The assessment was done at area mill processing, boiler and engineer room. | |
| | i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite. | Audiometric Testing | The audiometric testing was done conducted on 08/03/2024. The total of numbers is 145 workers sending for the testing. From the report, it summary result Hearing Impairment (HI) is 0 person and Standard Threshold Shift (STS) is 0 person. | |
| | j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. | LEV Testing | The LEV testing was done conducted by certified assessor on 28/05/2024 with the reference HQ/16/JHII/00/214-2024/065. | |
| | - Major compliance - | c) The management has been established annual training for the employee and it was prepared by Internal Team. Sighted the evidence: | | |
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| | | <p>During site visit at chemical store, it was observed that all chemical was labeling and SDS was provided and display information to public. Sighted the evidence:</p> <table><tr><td>Safety Data Sheet (SDS)</td><td>Available & Display</td></tr><tr><td>Procedure Handling Chemical</td><td>Available & Display</td></tr><tr><td>Labelling Chemical</td><td>Available & Display</td></tr></table> <p>d) Management has provided appropriate PPE to workers to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). Sighted the evidence:</p> <table><tr><td>Document</td><td>Description</td></tr><tr><td>Employee</td><td>Operator Process</td></tr><tr><td>PPE Received</td><td>Safety shoes, cotton gloves, earplug, safety helmet, vest.</td></tr></table> <p>e) The management has established standard operating procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health</p> <table><tr><td>Document</td><td>OSH Manual – Section 5: handling storage chemical</td></tr><tr><td>Date</td><td>June 2023</td></tr></table> <p>f) The management has appointed responsible person(s) for safety and health. Refer appointment letter, there is information of the roles and responsibilities of the appointed officer had clearly stated in the appointment letter. Sighted the evidence:</p> | Safety Data Sheet (SDS) | Available & Display | Procedure Handling Chemical | Available & Display | Labelling Chemical | Available & Display | Document | Description | Employee | Operator Process | PPE Received | Safety shoes, cotton gloves, earplug, safety helmet, vest. | Document | OSH Manual – Section 5: handling storage chemical | Date | June 2023 | |
| Safety Data Sheet (SDS) | Available & Display | | | | | | | | | | | | | | | | | | |
| Procedure Handling Chemical | Available & Display | | | | | | | | | | | | | | | | | | |
| Labelling Chemical | Available & Display | | | | | | | | | | | | | | | | | | |
| Document | Description | | | | | | | | | | | | | | | | | | |
| Employee | Operator Process | | | | | | | | | | | | | | | | | | |
| PPE Received | Safety shoes, cotton gloves, earplug, safety helmet, vest. | | | | | | | | | | | | | | | | | | |
| Document | OSH Manual – Section 5: handling storage chemical | | | | | | | | | | | | | | | | | | |
| Date | June 2023 | | | | | | | | | | | | | | | | | | |

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| | | <table><tr><td>Document</td><td>Appointment Letter PIC</td></tr><tr><td>Date</td><td>01/04/2021</td></tr><tr><td>PIC Name</td><td>Mr. N. Saravanaganes</td></tr></table> | Document | Appointment Letter PIC | Date | 01/04/2021 | PIC Name | Mr. N. Saravanaganes | |
| | | Document | Appointment Letter PIC | | | | | | |
| | | Date | 01/04/2021 | | | | | | |
| | | PIC Name | Mr. N. Saravanaganes | | | | | | |
| | | g) The management has conducted regular two-way communication with their employees during OSH Meeting with discussion on employee's health, safety and welfare. The safety meeting was conducted according to OSHA Requirement. Sighted the evidence: | | | | | | | |
| | | <table><tr><td>Document</td><td>OSH Minutes Meeting</td></tr><tr><td>Date Meeting</td><td>Meeting 1: 11/03/2024 Meeting 2: 26/06/2024 Meeting 3: Plan on Sept 2024</td></tr></table> | Document | OSH Minutes Meeting | Date Meeting | Meeting 1: 11/03/2024 Meeting 2: 26/06/2024 Meeting 3: Plan on Sept 2024 | | | |
| | | Document | OSH Minutes Meeting | | | | | | |
| | | Date Meeting | Meeting 1: 11/03/2024 Meeting 2: 26/06/2024 Meeting 3: Plan on Sept 2024 | | | | | | |
| | | h) The management has established accident and emergency procedures and the instructions clearly understood by all employees. Sighted document as below evidence: | | | | | | | |
| | | <table><tr><td>Document</td><td>OSH Manual – Accident & Investigation Procedure</td></tr><tr><td>Date</td><td>20/02/2008</td></tr><tr><td>Training to workers</td><td>Done conducted: 08/01/2024</td></tr></table> | Document | OSH Manual – Accident & Investigation Procedure | Date | 20/02/2008 | Training to workers | Done conducted: 08/01/2024 | |
| | | Document | OSH Manual – Accident & Investigation Procedure | | | | | | |
| | | Date | 20/02/2008 | | | | | | |
| | | Training to workers | Done conducted: 08/01/2024 | | | | | | |
| | | i) First aider has been present at works station. The Latest training has been conducted as refer to attendance list. First aid box also was inspected during site visit and found contains with approved contents. Sighted the evidence: | | | | | | | |
| | | <table><tr><td>First Aid Box (FAB)</td><td>Available at boiler room Available at Laboratory</td></tr><tr><td>Date Inspection</td><td>10/06/2024 done by Hospital Assistant (HA)</td></tr></table> | First Aid Box (FAB) | Available at boiler room Available at Laboratory | Date Inspection | 10/06/2024 done by Hospital Assistant (HA) | | | |
| First Aid Box (FAB) | Available at boiler room Available at Laboratory | | | | | | | | |
| Date Inspection | 10/06/2024 done by Hospital Assistant (HA) | | | | | | | | |

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| | | <table><tr><td>Observation</td><td>All the item in FAB updated.</td></tr></table> <p>j) The management has recorded and kept of all accidents, and it was reviewed periodically intervals by internal team. Sighted the evidence:</p> <table><tr><td>Document</td><td>JKKP 8 Submission</td></tr><tr><td>Date</td><td>15/01/2024</td></tr><tr><td>Reference</td><td>JKKP8/125500/2023</td></tr><tr><td>Accident</td><td>Zero (0)</td></tr></table> <p><u>OFI:</u></p> <p>The management has complied with legal requirements and ensured that Chemical Exposure Monitoring (CEM) and OSH Committee Meetings are conducted. For further improvement, the following steps could be taken:</p> <p>Follow up on the Chemical Exposure Monitoring (CEM) report to obtain it from the assessor.</p> <p>1. Ensure that OSH Committee Meetings are conducted at the required frequency as per the Occupational Safety and Health (Safety and Health Committee) Regulations 1996.</p> | Observation | All the item in FAB updated. | Document | JKKP 8 Submission | Date | 15/01/2024 | Reference | JKKP8/125500/2023 | Accident | Zero (0) | |
| Observation | All the item in FAB updated. | | | | | | | | | | | | |
| Document | JKKP 8 Submission | | | | | | | | | | | | |
| Date | 15/01/2024 | | | | | | | | | | | | |
| Reference | JKKP8/125500/2023 | | | | | | | | | | | | |
| Accident | Zero (0) | | | | | | | | | | | | |
| Criterion 4.4.5: Employment conditions | | | | | | | | | | | | | |
| 4.4.5.1 | The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees. - Major compliance - | The management has established the Human Rights Policy signed by Chief Executive Director dated 09/03/2020. The United Plantations Berhad are committed to the protection and advancement of human rights including prohibiting retaliation, intimidation, and harassment against Human Rights Defenders | Complied | | | | | | | | | | |

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| | <p>(HRD), whistleblowers, complainants, and community spokespersons.</p> <p>The objectives are as follows:</p> <ol style="list-style-type: none"> 1. We adhere to the fundamental elements of International Labour Organization (ILO) Convention and the United Nations Declaration on Human Rights, the Rights of Indigenous Peoples and other core values as ratified by the countries in which we operate. 2. We ensure all personnel are treated fairly and protected from any form of discrimination that would constitute a violation of their human rights. 3. We ensure equal opportunities provided to all personnel. The process of recruitment, promotion and remuneration are solely based on individual qualification and performance regardless of religion, race, age, gender, nationality, or physical disability. 4. We respect the rights of all personnel to form, join and participate in registered trade unions and to bargain collectively. 5. We respect the rights of people in communities impacted by our activities. We will seek to identify adverse social and environmental impacts through their respective assessments and take appropriate steps to avoid, minimize and/or mitigate them. 6. We respect land tenure rights as well as recognize duties and responsibilities associated with tenure rights. 7. We respect customary or native rights of indigenous and local communities, and we commit to Free, Prior and Informed | |

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| | | <p>Consent (FPIC) in all negotiations prior to commencing any new operations.</p> <p>8. We resolve all complaints and grievances through an open, transparent and consultative process.</p> <p>9. We will not tolerate the use of child or forced labour, slavery or human trafficking in any of our plantations and facilities. We are using the definition from United Nations Convention on the Rights of the Child which define 'child' as anyone who is less than 18 years old.</p> <p>10. We will strive to commit our employees, contractors, suppliers, trading partners, contracted security forces, associated local communities and stakeholders to adhere to this policy.</p> <p>Evident the training record on policies to all workers such as Human Rights, Gender, Guest Workers/Foreign Workers, HCV Awareness, Whistleblower, CSR, publicly available documents, RSPO, MSPO, OSH and Biodiversity and Environment Policy during Muster Ground dated:</p> <p>1. UIE Estate (Estate 2) – 19/01/2024</p> <p>2. UIE POM – 06/01/2024</p> | |
| 4.4.5.2 | <p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p> | <p>Stated in the Human Rights Policy objectives:</p> <p>1. We ensure all personnel are treated fairly and protected from any form of discrimination that would constitute a violation of their human rights.</p> <p>2. We ensure equal opportunities provided to all personnel. The process of recruitment, promotion and remuneration are solely based on individual qualification and performance regardless of religion, race, age, gender, nationality or physical disability.</p> | Complied |

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| | | 3. We respect the rights of all personnel to form, join and participate in registered trade unions and to bargain collectively. Based on document review and interview with sampled employees there is no discrimination actions by the management in terms of race, colour, sex, religion, political opinion, nationality, social origin, or any other distinguishing characteristics. All employees satisfied with fair treatment by the management. | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.4.5.3 | Management shall ensure that employees’ pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance - | The management have paid their employees equally based on agreed Collective Agreement. The documentation of pay and conditions of samples employees and contractor workers are available and meet the applicable laws such as Minimum Wages Order and Employment Act 1955. The contractor will submit the copy of their worker’s payslip for estates and mills reference. Sighted the samples of employment contracts, pay slips for the month of February 2024, April 2024 and May 2024, identification card, passport, permit, EPF and SOCSO employer contributions, overtime details, medical leaves and annual leaves from different nationalities, races, and genders of: <table><tr><td>Employee No</td><td>Nationality</td><td>Type of work</td><td>Gender</td><td>Passport/ Visa Validity</td></tr><tr><td>411826</td><td>Malaysian (Indian)</td><td>Lab</td><td>Female</td><td></td></tr><tr><td>401740</td><td>Malaysian (Indian)</td><td>Cleaner</td><td>Female</td><td></td></tr><tr><td>416838 (Intake May '24)</td><td>Bangladeshi</td><td>Mechanical</td><td>Male</td><td>P:21/02/2027 V: In-progress</td></tr></table> | | | | | Employee No | Nationality | Type of work | Gender | Passport/ Visa Validity | 411826 | Malaysian (Indian) | Lab | Female | | 401740 | Malaysian (Indian) | Cleaner | Female | | 416838 (Intake May '24) | Bangladeshi | Mechanical | Male | P:21/02/2027 V: In-progress | Complied |
| Employee No | Nationality | Type of work | Gender | Passport/ Visa Validity | | | | | | | | | | | | | | | | | | | | | | | |
| 411826 | Malaysian (Indian) | Lab | Female | | | | | | | | | | | | | | | | | | | | | | | | |
| 401740 | Malaysian (Indian) | Cleaner | Female | | | | | | | | | | | | | | | | | | | | | | | | |
| 416838 (Intake May '24) | Bangladeshi | Mechanical | Male | P:21/02/2027 V: In-progress | | | | | | | | | | | | | | | | | | | | | | | |

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| | | 415523 | Bangladeshi | Process | Male | P:01/04/2026 V:24/04/2025 | |
| | | 416845 (Intake May '24) | Indian | Process | Male | P:29/03/2032 V: In-progress | |
| | | 120904 | Indian | Process | Male | P:29/01/2029 V: valid | |
| | | 416278 | Indonesia | Process | Male | P:13/04/2026 V:08/12/2024 | |
| | | 414799 | Nepal | Process | Male | P:17/09/2030 V:01/12/2024 | |
| | | 416207 | Malaysian (Indian) | Electrician | Male | | |
| | | 416759 | Malaysian (Indian) | Store | Male | | |
| | | 413381 | Malaysian (Malay) | Carpenter | Male | | |
| | | During document review and consultation with the sample's worker, there is no evident that the recruitment fees has been charged to guest or foreign workers as the company applied the workers via Guest Worker Recommend Guest Worker program or Accredited Recruiting Agent or government to government program. All the workers satisfied with the salary payment, overtime, allowances, and deductions. The nominated guest worker rep based on nationality and gender committee rep have been invited during the consultation with workers. | | | | | |
| Sighted the approval for salary deductions under Sect 24 of Employment Act 1955 for United Plantations Berhad dated 01/06/2012 (Ref: (6) dlm BHG PU/9/129) from the Labour | | | | | | | |

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| | | Department. Stated that the deduction must not more than 50% from the monthly basic or 75% is there is any housing loan included and other requirements. | |
| 4.4.5.4 | <p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p> | <p>The documentation of pay and conditions of samples employees and contractor workers are available and meet the applicable laws such as Minimum Wages Order and Employment Act 1955. The contractor will submit the copy of their worker's payslip and employment documents for estates and mills reference.</p> <p>Stated in the agreement, Clause (11): The contractor shall adhere to the attached UP's Company Policies as follow which are required under MSPO and RSPO certifications such as Human Rights Policy (e.g.: no child labor and trafficked labor and equal treatment), OSH policy, gender policy, valid employment contract for contractor workers, minimum wages order, etc.</p> <p>Evident the contractor agreement between United Plantations Berhad:</p> <ol style="list-style-type: none"> 1. Excxxxxnt Ixxxxxt Sdn Bhd – to arrange for hiring vehicles or use their own, if any, to transport Crude Palm Oil from the Hirer's Palm Oil Mills to the destinations as stipulated by the Hirer. The agreement signed and delivered by Company Secretary and Excxxxxnt Ixxxxxt Sdn Bhd. The agreement is valid from 1 January 2024 to 31 December 2024 unless terminated earlier under Clause 8. Evident the following document: <ul style="list-style-type: none"> - Sighted the pay slip (February and May 2024), identification card, driving license, employer SOCSO and EPF contribution for sampled workers with IC No: 92xx08-08-xx61 and 60xx03-08-xx67. | Complied |

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| | | <ul style="list-style-type: none"> - Review the EPF contribution in Borang A (Ref no: 023xxxxxx524 and employer ref no: 023xxxx29) for the month 05/2024. - Verified the SOCSO & EIS as per Form 8A for the month 05/2024 under Employer Code No: D44xxxxxx99F. - Evident the employment contract titled 'Perlantikan Pekerjaan' of the above contractor workers dated 02/23/2020 and 09/10/2022 as Tanker Driver that comprises the name, identification number, dates, salary, working day, working hour, termination of service, leaves, rules, and regulations. <p>2. Sxxhy Trxxxxort Sdn Bhd - to arrange for hiring vehicles or use their own, if any, to transport Crude Palm Oil from the Hirer's Palm Oil Mills to the destinations as stipulated by the Hirer. The contractors agrees that the hiring of the contractor's vehicles is at the sole discretion of the Hirer. The agreement made on 01/01/2024. The transport rates as per letter dated 29/04/2020 (Appendix 1) are to be revised monthly based on the average monthly diesel prices as announced by the Government. The agreement signed and delivered by Company Secretary and Sxxhy Trxxxxort Sdn Bhd. The agreement is valid from 1 January 2024 to 31 December 2024 unless terminated earlier under Clause 8. Evident the following document:</p> <ul style="list-style-type: none"> - Sighted the pay slip (February, April and May 2024), identification card, driving license, employer SOCSO and EPF contribution for sampled workers with IC No:74xx09-08-xx91 and 82xx07-03-xx09. - Review the EPF contribution in Borang A (employer ref no: 165xxx12) for the month 05/2024. | |

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| | | <ul style="list-style-type: none"> - Verified the SOCSO & EIS as per Form 8A for the month 05/2024 under Employer Code No: D41xxxxxx19A. - Evident the employment contract of the above contractor workers dated 14/01/2023 and 29/09/2023 as Lorry Driver that comprises the name, identification number, dates, salary, working day, working hour, termination of service, leaves, rules, and regulations. <p>3. Sxi Nexxsh Axxxcy - to arrange for hiring vehicles or use their own, if any, to transport Crude Palm Oil from the Hirer's Palm Oil Mills to the destinations as stipulated by the Hirer. The contractors agrees that the hiring of the contractor's vehicles is at the sole discretion of the Hirer. The agreement made on 01/10/2024. The transport rates as per letter dated 29/04/2020 (Appendix 1) are to be revised monthly based on the average monthly diesel prices as announced by the Government. The agreement signed and delivered by Company Secretary and Sxi Nexxsh Axxxcy. The agreement is valid from 1 January 2024 to 31/12/2024 unless terminated earlier under Clause 8. Evident the following document:</p> <ul style="list-style-type: none"> - Sighted the pay slip (February, April and May 2024), identification card, driving license, employer SOCSO and EPF contribution for sampled workers with IC No:93xx07-10-xx85 and 89xx16-08-xx31. - Evident the employment contract of the above contractor workers dated 23/01/2024 as Lorry Driver that comprises the name, identification number, dates, salary, working day, working hour, termination of service, leaves, rules, and regulations. | |

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| 4.4.5.5 | The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance - | The management registered all their workers into Employee Master Details List. Review on the listing included workers' personal details such as full name, gender, date of birth, date join company, race, designation, and wages were available. | Complied |
| 4.4.5.6 | All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records. - Major compliance - | The management has established employment contract for all workers and contractors' workers. All the terms and conditions stated in the employment agreement were as per Labour Act 1955, latest MAPA/NUPW Agreement and Minimum Wage Order 2022 (amendment). Among the clause spell out in the contracts includes: <ol style="list-style-type: none"> 1. Duration of the Contract of Employment 2. Wages 3. Working Hours 4. Rest Day 5. Public Holiday 6. Annual Leave/Vacation Leave 7. Levy 8. Medical and SOCSO Employment Injury Scheme 9. Deductions 10. Accommodation, Amenities and Transportation 11. Sick Leave 12. Renewal of Employee's work permit 13. Air Passage 14. Repatriation | Complied |

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| | | 15. Termination 16. Restriction and Termination of Service 17. Safekeeping of the Passport 18. Outstanding Wages 19. Medical Examination 20. Tools 21. Deceased Employee 22. Grievance Redressal Procedure 23. Unresolved Disputes 24. Induction Course 25. Time is an Essence 26. Interpretation 27. Understanding of job type 28. Succession Also evident, the employment contract of the samples contractor workers that comprises the name, identification number, dates, salary, working day, working hour, termination of service, leaves, rules, and regulations. The employment contract was prepared in various languages based on the nationality such as Bahasa Malaysia, English, Tamil, Bengali and Nepali for better understanding. All the workers get the copy of their employment contract. | |
| 4.4.5.7 | The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. | All the daily attendance and overtime work were recorded in the Daily attendance record and payroll system. Onsite interview and document review with sampled workers (as listed in 4.4.5.3) | Complied |

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| | - Major compliance - | informed working time and break time is according to employment contract. Overtime offered to workers is voluntarily upon mutually agreement between management and workers including compliance by contractor as per their Letter of Award. | |
| 4.4.5.8 | The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. - Major compliance - | All the daily attendance and overtime work were recorded in the Daily attendance record and payroll system. Onsite interview and document review with sampled workers (as listed in 4.4.5.3) informed working time and break time is according to employment contract. Overtime offered to workers is voluntarily upon mutually agreement between management and workers including compliance by contractor as per their Letter of Award. | Complied |
| 4.4.5.9 | Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance - | The documentation of pay and conditions of samples employees and contractor workers are available and meet the applicable laws such as Minimum Wages Order and Employment Act 1955. All the daily attendance and overtime work were recorded in the Daily attendance record and payroll system. Onsite interview and document review with sampled workers (as listed in 4.4.5.3) informed working time and break time is according to employment contract. Overtime offered to workers is voluntarily upon mutually agreement between management and workers including compliance by contractor as per their Letter of Award. During document review and interview with the sample's worker, all the workers satisfied with the salary payment, overtime, allowances, and deductions. | Complied |
| 4.4.5.10 | Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional | Stated in the employment contract under Accommodation, Amenities and Transportation that: | Complied |

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| | development, medical care provisions and improvement of social surroundings. - Minor compliance - | The company shall provide free accommodation for the duration of The Employee's term of service with The Company. Each house or unit shall be shared by 6 employees (3 bedroom) and by 4 employees (2 bedroom). All workers are provided with free medical facilities located in estate, free housing facilities were provided to all the workers and their families including subsidised electricity and water (50gallons), mosque, temples, hall, playground, creche, school bus, allowances, bonuses, etc as sighted during the site visit. The houses are in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) in term of size and number occupant. | |
| 4.4.5.11 | In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance - | Stated in the employment contract under Accommodation, Amenities and Transportation that: The company shall provide free accommodation for the duration of The Employee's term of service with The Company. Each house or unit shall be shared by 6 employees (3 bedroom) and by 4 employees (2 bedroom). All workers are provided with free medical facilities located in estate, free housing facilities were provided to all the workers and their families including subsidised electricity and water (50gallons), mosque, temples, hall, playground, creche, school bus, allowances, bonuses, etc as sighted during the site visit. The houses are in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) in term of size and number occupant. | Complied |
| 4.4.5.12 | The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance - | The management has established the Gender Policy signed by Chief Executive Director dated 24/04/2015. The United Plantations Berhad are committed to maintaining a workplace free from harassment of any kind, including harassment | Complied |

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| | | <p>based on an employee's race, colour, religion, gender, national origin, ancestry, disability, marital status and sexual orientation. In line with the policy, we shall:</p> <ol style="list-style-type: none"> 1. Endeavour to prevent sexual harassment and all other forms of violence against women and workers in the workplace or in the course of an employee's work. 2. Adopt a specific complaints and grievance procedure and mechanism to address gender-based issues. 3. Encourage effective participation of women in decision-making by their representation as members of various committees, such as the Occupational Safety and Health Committee. 4. Establish a Gender Committee to implement and monitor the policy. 5. To protect the Reproductive Rights and Motherhood responsibilities of women as under the Universal Declaration of Human Rights and labour laws. 6. We will communicate to our employees, contractors, and suppliers to adhere to the values of this policy. <p>The management also has established the Grievance and redressal for sexual harassment in the workplace in accordance with United Plantations Berhad sexual harassment & violence policy. Evident the Misconduct Report Form (Sexual Harassment & Violence).</p> <p>Any worker who has grievance related to sexual harassment or violence nature can obtain the complaint form from one of the sub-committee members in respective Estates/Departments and either complete it herself or request the assistance of the sub-committee member to fill it up. The complaint form is to be submitted to the</p> | |

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| | | <p>respective Head of Department and copied to the Gender Committee.</p> <p>The management has established Gender Committee and centralized for UIE Palm Oil Mill and UIE Estate. The latest meeting has been conducted on 23/04/2024 at UIE Committee Hall attended by 20 members comprises of chairperson, secretary and female members from account department, telephone operator, plantation stores, workshop, mill office, engineering/mill stores, sundry gang (estate), Estate 2 and research.</p> <p>The agenda of the meeting are as follows:</p> <ol style="list-style-type: none"> 1. Briefing on UP's Gender Policy 2. Briefing on the UP's Grievance Procedure on sexual harassment and domestic/workplace violence 3. Discussion on women specific topics 4. New Mother Assessment 5. Briefing on the rights and needs of new mother (pre-and post-delivery) 6. Summary of sexual harassment and domestic/workplace violence 7. Gathering feedback and input 8. Others (domestic/workplace related issues) <p>Based on the minutes there is no cases of sexual harassment and domestic violence has been reported since 2023 and has confirmed during consultation with the female workers and gender committee representatives.</p> | |
| 4.4.5.13 | The management shall respect the right of all employees to form | Stated in the Human Rights Policy objectives: | Complied |

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| <p>and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p> | <p>We respect the rights of all personnel to form, join and participate in registered trade unions and to bargain collectively.</p> <p>The latest Guest Welfare Committee meeting titled 'Mesyuarat Kebajikan Pekerja Tetamu (Guest Worker/Foreign Workers) Ladang- Ladang UIE' for UIE POM and UIE Estate has been conducted on 15/02/2024.</p> <p>The meeting chaired by Senior Manager, attended by committee members, representative from temple, mosque, Auxiliary Police, Hospital Assistant and 20 guest worker or foreign worker representatives from each nationality such as 8 Bangladeshi, 5 Indonesians, 7 Indians, and 1 Nepalese.</p> <p>The agenda of the meeting:</p> <ol style="list-style-type: none"> 1. Introduction by Chairman 2. Confirmation of previous minutes meeting 3. Orientation for new worker 4. Matter Arising 5. Water Supply 6. Mosque/temple 7. Electricity 8. Safety 9. Fight Case 10. Recreational 11. Salary & Pay Slip 12. Festival Ceremony 13. Accommodation | |

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| | | <p>14. Hygiene & Sanitation 15. Amenities & Facilities 16. Others</p> <p>During the meeting, only 1 request from the worker for management to change the schedule of grass cutting on rest day to workday due to the noise of the machine disturbs the workers in the workers' housing area. The appropriate action has been taken as evident during the audit.</p> <p>Furthermore, during consultation with all the sample's workers, the workers informed that the workers representative has been nominated by them and they have freedom to join union.</p> | |
| 4.4.5.14 | <p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p>- Major compliance -</p> | <p>Stated in the Human Rights Policy objectives: We will not tolerate the use of child or forced labour, slavery, or human trafficking in any of our plantations and facilities. We are using the definition from United Nations Convention on the Rights of the Child which define 'child' as anyone who is less than 18 years old.</p> <p>The management clearly not allow individual under the age of 18 years to work at the premise. As sighted in the list of workers there is no workers below 18 years old.</p> | Complied |
| Criterion 4.4.6: Training and competency | | | |
| 4.4.6.1 | <p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p>- Major compliance -</p> | <p>The management has established a training programmed to the workers and the awareness training was done conducted to the employee from internal team. All record of training was documented. Sighted the evidence:</p> | Complied |

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| | | <div>Details information on the actual training programmed:</div> <table><tr><td>Document</td><td>Training Programmed</td></tr><tr><td>Date</td><td>Year 2024</td></tr><tr><td>Hearing Training</td><td>Done conducted: 31/05/2024</td></tr><tr><td>SOP Training</td><td>Done conducted: 06/01/2024</td></tr><tr><td>Fire Drill Training</td><td>Done conducted: 08/01/2024</td></tr><tr><td>ERP Training</td><td>Done conducted: 08/01/2024</td></tr><tr><td>PPE Training</td><td>Done conducted: 04/02/2024</td></tr><tr><td>Chemical Training</td><td>Done conducted: 19/06/2024</td></tr></table> | Document | Training Programmed | Date | Year 2024 | Hearing Training | Done conducted: 31/05/2024 | SOP Training | Done conducted: 06/01/2024 | Fire Drill Training | Done conducted: 08/01/2024 | ERP Training | Done conducted: 08/01/2024 | PPE Training | Done conducted: 04/02/2024 | Chemical Training | Done conducted: 19/06/2024 | |
| Document | Training Programmed | | | | | | | | | | | | | | | | | | |
| Date | Year 2024 | | | | | | | | | | | | | | | | | | |
| Hearing Training | Done conducted: 31/05/2024 | | | | | | | | | | | | | | | | | | |
| SOP Training | Done conducted: 06/01/2024 | | | | | | | | | | | | | | | | | | |
| Fire Drill Training | Done conducted: 08/01/2024 | | | | | | | | | | | | | | | | | | |
| ERP Training | Done conducted: 08/01/2024 | | | | | | | | | | | | | | | | | | |
| PPE Training | Done conducted: 04/02/2024 | | | | | | | | | | | | | | | | | | |
| Chemical Training | Done conducted: 19/06/2024 | | | | | | | | | | | | | | | | | | |
| 4.4.6.2 | <div>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</div> <div>- Major compliance -</div> | <div>The management has established training needs of individual employees in order to provide the specific skill and competency required to all employees based on their job description. Refer training needs, there is allocation specific training module for category of employee. Sighted the evidence:</div> <div>Details information on the training need of employee:</div> <table><tr><td>Document</td><td>Training Need Analysis</td></tr><tr><td>Date</td><td>Year 2024</td></tr><tr><td>Category</td><td>Staffs and workers</td></tr></table> | Document | Training Need Analysis | Date | Year 2024 | Category | Staffs and workers | Complied | | | | | | | | | | |
| Document | Training Need Analysis | | | | | | | | | | | | | | | | | | |
| Date | Year 2024 | | | | | | | | | | | | | | | | | | |
| Category | Staffs and workers | | | | | | | | | | | | | | | | | | |
| 4.4.6.3 | <div>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.</div> <div>- Minor compliance -</div> | <div>The management has established a training programmed to the workers and the awareness training was done conducted to the employee from internal team. All record of training was documented. Sighted the evidence:</div> <div>Details information on the actual training programmed:</div> <table><tr><td>Document</td><td>Training Programmed</td></tr><tr><td>Date</td><td>Year 2024</td></tr><tr><td>Hearing Training</td><td>Done conducted: 31/05/2024</td></tr><tr><td>SOP Training</td><td>Done conducted: 06/01/2024</td></tr></table> | Document | Training Programmed | Date | Year 2024 | Hearing Training | Done conducted: 31/05/2024 | SOP Training | Done conducted: 06/01/2024 | Complied | | | | | | | | |
| Document | Training Programmed | | | | | | | | | | | | | | | | | | |
| Date | Year 2024 | | | | | | | | | | | | | | | | | | |
| Hearing Training | Done conducted: 31/05/2024 | | | | | | | | | | | | | | | | | | |
| SOP Training | Done conducted: 06/01/2024 | | | | | | | | | | | | | | | | | | |

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| | | <table><tr><td>Fire Drill Training</td><td>Done conducted: 08/01/2024</td></tr><tr><td>ERP Training</td><td>Done conducted: 08/01/2024</td></tr><tr><td>PPE Training</td><td>Done conducted: 04/02/2024</td></tr><tr><td>Chemical Training</td><td>Done conducted: 19/06/2024</td></tr></table> | Fire Drill Training | Done conducted: 08/01/2024 | ERP Training | Done conducted: 08/01/2024 | PPE Training | Done conducted: 04/02/2024 | Chemical Training | Done conducted: 19/06/2024 | After training finished the Assessment Training was conducted to the participant purposely to know their understanding. The record was documented. | |
| Fire Drill Training | Done conducted: 08/01/2024 | | | | | | | | | | | |
| ERP Training | Done conducted: 08/01/2024 | | | | | | | | | | | |
| PPE Training | Done conducted: 04/02/2024 | | | | | | | | | | | |
| Chemical Training | Done conducted: 19/06/2024 | | | | | | | | | | | |
| 4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services | | | | | | | | | | | | |
| Criterion 4.5.1: Environmental Management Plan | | | | | | | | | | | | |
| 4.5.1.1 | An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance - | United Plantations Berhad has established a Environment And Biodiversity Policy dated 08/3/2021. The policy was endorsed by Dato Carl Bek-Nielsen Chief Executive Director and implemented. The policy was displayed prominently on notice boards in English, Bahasa Malaysia and others various languages for the entire employees from other countries to understand and comply. Therein among others has stated that the Company is committed to protecting the environment and conserving biodiversity through minimizing environmental harms: i. Protecting and enhancing biodiversity and the ecosystem ii. No deforestation and no new development on peat soil iii. Enhancing resilience against climate change impact iv. Adopting responsible consumption and production. This policy is prominently displayed in the office along with other Company’s Policies. It is communicated to the employees via training and weekly briefing session among others as follows: | | Complied | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | | Compliance |
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| | | Subject | Date | | |
| | | UPB Policies awareness | 06/01/2024 | | |
| | | HCV Management | 08/01/2024 | | |
| | | ERP (Spillage / ETP overflow / disaster) | 06/05/2024 | | |
| | | Scheduled Waste Management | 27/05/2024 | | |
| | | Domestic waste management | 06/01/2024 | | |
| 4.5.1.2 | <p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations</p> <p>- Major compliance -</p> | <p>The mill has established an Environmental Management Plan 2024 (EMP) based on aspect and impacts analysis conducted. The EMP was established based on Environmental Aspect Impact Identification and Environmental Impact Evaluation conducted and documented in Waste / Pollution Prevention Plan 2024.</p> <p>a) The Environmental Policy has been established as described in 4.5.1.1 above. The objectives of the environmental management plan among others include the following:</p> <ul style="list-style-type: none"> i. Implementing / complying to all statutory environmental laws ii. Plantation development emphasizing zero burning practices. iii. Compliance of DOE - to minimize pollution of land/water/air. iv. Identification of HCV and preserving riparian zones. <p>b) The environmental aspects and impact evaluation reviewed on 23/04/2024 covers the following activities among others:</p> <ul style="list-style-type: none"> i. Boiler operation / power generation ii. Crude palm oil storage leakage & spillage | | | Complied |

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| | | <div><div><div>iii. Effluent pond ruptured</div><div>iv. All work stations</div><div>v. Process operations and workshop activities.</div><div>vi. Biogas Plant</div><div>vii. Construction Of Housing / Other related Facilities</div></div><div>Therein detailing the mitigation and the management plan in highlighting the positive and addressing the negatives impact arising from the mill operations and activities</div></div> | | | | | | | | | | | | | | | | | | | |
| 4.5.1.3 | An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance - | <div><div>The developed Environmental Improvement Plan to mitigate the negative impacts and to promote the positive ones were effectively implemented and monitored and incorporated in the Environmental Management Plan 2024. The Environmental Improvement Plan dated 03/01/2024 described details of mitigation of the negative impacts. They are summarized and among others as shown below:</div><table><tr><th>Activities</th><th>Impact</th><th>Management Plan</th></tr><tr><td>Water management</td><td>Protection of river quality inlet/outlet</td><td>Quarterly water analysis with submission to DOE</td></tr><tr><td>Air Emission</td><td>Reduce emission pollution</td><td>CEMS - Daily monitoring</td></tr><tr><td>Water Catchment</td><td>Conservation awareness</td><td>Educate employees on ruling and protection</td></tr><tr><td>Pollution prevention</td><td>Comply with DOE Jadwal Pematuhan</td><td>To maintain oil trap to prevent spillage/proper spill kit</td></tr><tr><td>Pollution prevention</td><td>Ensure no open burning</td><td>Display signage and scheduled housing inspection</td></tr></table></div> | Activities | Impact | Management Plan | Water management | Protection of river quality inlet/outlet | Quarterly water analysis with submission to DOE | Air Emission | Reduce emission pollution | CEMS - Daily monitoring | Water Catchment | Conservation awareness | Educate employees on ruling and protection | Pollution prevention | Comply with DOE Jadwal Pematuhan | To maintain oil trap to prevent spillage/proper spill kit | Pollution prevention | Ensure no open burning | Display signage and scheduled housing inspection | Complied |
| Activities | Impact | Management Plan | | | | | | | | | | | | | | | | | | | |
| Water management | Protection of river quality inlet/outlet | Quarterly water analysis with submission to DOE | | | | | | | | | | | | | | | | | | | |
| Air Emission | Reduce emission pollution | CEMS - Daily monitoring | | | | | | | | | | | | | | | | | | | |
| Water Catchment | Conservation awareness | Educate employees on ruling and protection | | | | | | | | | | | | | | | | | | | |
| Pollution prevention | Comply with DOE Jadwal Pematuhan | To maintain oil trap to prevent spillage/proper spill kit | | | | | | | | | | | | | | | | | | | |
| Pollution prevention | Ensure no open burning | Display signage and scheduled housing inspection | | | | | | | | | | | | | | | | | | | |

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| | | Pollution prevention | Leacheate into estate trench | Drainage system being monitored. To ensure proper application of EFB and good effluent management | | | | | | | | | | | | | | | | |
| 4.5.1.4 | A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance - | A programme to promote the positive impact has been included in the continual improvement plan. Status, budget and person in charge were included in the plan for monitoring the progress. Practices of the continual improvement plan as elaborated in 4.5.1.3 above. There are also improvements planned for both short and long terms with costing provided in the capital expenditure (CAPEX). These are decided by the higher level of the management. Among the programme as listed below: <table><tr><td>Project</td><td>Cost</td><td>Schedule</td></tr><tr><td>EFB Storage Roofing</td><td>RM500K</td><td>June 2025</td></tr><tr><td>Effluent Desilting 2 ponds/year</td><td>RM100K</td><td>Aug 2024</td></tr><tr><td>New Decanter Installation</td><td>RM540K</td><td>Dec 2023</td></tr><tr><td>Mill Upgrading/ Enhancement</td><td>RM150M</td><td>2027</td></tr></table> | | | Project | Cost | Schedule | EFB Storage Roofing | RM500K | June 2025 | Effluent Desilting 2 ponds/year | RM100K | Aug 2024 | New Decanter Installation | RM540K | Dec 2023 | Mill Upgrading/ Enhancement | RM150M | 2027 | Complied |
| Project | Cost | Schedule | | | | | | | | | | | | | | | | | | |
| EFB Storage Roofing | RM500K | June 2025 | | | | | | | | | | | | | | | | | | |
| Effluent Desilting 2 ponds/year | RM100K | Aug 2024 | | | | | | | | | | | | | | | | | | |
| New Decanter Installation | RM540K | Dec 2023 | | | | | | | | | | | | | | | | | | |
| Mill Upgrading/ Enhancement | RM150M | 2027 | | | | | | | | | | | | | | | | | | |
| 4.5.1.5 | An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - Major compliance - | The mill continuously provide training to the workers to create awareness regarding the environmental policy and management plan established. Based on the samples taken, all training related to the process were concluded to continuously improve the mill employee’s awareness and compliance. Session among others as listed below: <table><tr><td>Subject</td><td>Date</td></tr><tr><td>UPB Policies awareness</td><td>06/01/2024</td></tr><tr><td>HCV Management</td><td>08/01/2024</td></tr><tr><td>ERP (Spillage / ETP overflow / disaster)</td><td>06/05/2024</td></tr></table> | | | Subject | Date | UPB Policies awareness | 06/01/2024 | HCV Management | 08/01/2024 | ERP (Spillage / ETP overflow / disaster) | 06/05/2024 | Complied | | | | | | | |
| Subject | Date | | | | | | | | | | | | | | | | | | | |
| UPB Policies awareness | 06/01/2024 | | | | | | | | | | | | | | | | | | | |
| HCV Management | 08/01/2024 | | | | | | | | | | | | | | | | | | | |
| ERP (Spillage / ETP overflow / disaster) | 06/05/2024 | | | | | | | | | | | | | | | | | | | |

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| | | Scheduled Waste Management | 27/05/2024 | | | | | | | | |
| | | Domestic waste management | 06/01/2024 | | | | | | | | |
| 4.5.1.6 | The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance - | The forum used in discussing environmental issues are made in the following sessions: i. EPMC - Environmental Performance Monitoring Committee held annually recent being on 25/06/2024. Among others the agenda discussed as follows: - Continuous Emission Monitoring System (CEMS) - SW Management - Waste / Water Management Plan - Effluent Performance / Biogas Operations - Zero Burning - Continuous Improvement Plan / Training ii. Stakeholder’s meeting. (Dated 23/04/2024 - 58 participants) iii. Employees muster ground prior to mill operations. | | | Complied | | | | | | |
| Criterion 4.5.2: Efficiency of energy use and use of renewable energy | | | | | | | | | | | |
| 4.5.2.1 | Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period - Major compliance - | A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities 2024. The document was reviewed/updated on Jan 2024. The Environment Management Plan for efficiency of fossil fuel usage among others are detailed below: <table><tr><td>Action</td><td>Document</td><td>PIC</td></tr><tr><td>Closely monitoring of vehicle usage as well on repair and maintenance</td><td>Vehicle maintenance record</td><td>Tractor workshop fitter</td></tr></table> | | | Action | Document | PIC | Closely monitoring of vehicle usage as well on repair and maintenance | Vehicle maintenance record | Tractor workshop fitter | Complied |
| Action | Document | PIC | | | | | | | | | |
| Closely monitoring of vehicle usage as well on repair and maintenance | Vehicle maintenance record | Tractor workshop fitter | | | | | | | | | |

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| | | Upgrading of mill process from old O/H crane system to renew FFB tippler system together with the undertow system eliminating the usage of tractor in the process line. Thus, reducing diesel usage. | | New processing line | Process supervisor | | |
| | | Removing the no of aging motorbike from service has gradually reduce the petrol consumption | | Vehicle maintenance record | Tractor workshop fitter | | |
| | | The utilization of fossil fuel in 2023 total is 89084 L. The baseline 0.33 diesel/mt FFB is being monitored with records shown below: | | | | | |
| | | Year | Diesel/FFB | | Year | | Diesel/FFB |
| | | 2019 | 0.34 | | 2022 | | 0.30 |
| | | 2020 | 0.310 | | 2023 | 0.30 | |
| | | 2019 | 0.34 | | - | - | |
| | | A monthly record on energy consumption for both renewable and non-renewable sources were also maintained and documented. It is monitored to optimize use of renewable energy. The data is compiled for comparison and control for future improvement with aim of gradual reduction particularly diesel. | | | | | |
| | | The electricity energy monitoring based on FFB processed tabulated as shown below: | | | | | |
| | | Energy Monitoring | 2021 | 2022 | 2023 | | |
| | | Turbine (KwH) | 5882898 | 5441075 | 6131913 | | |
| | | FFB processed /mt | 284198 | 281921 | 290612 | | |
| | | Kwh / mt FFB | 20.70 | 19.30 | 21.10 | | |

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| | | Variation of ratio in the analysis were explained and justified. Under the energy management plan 2024 the mill aimed for reduction plan among others: i. Educate workers on fuel saving practice. ii. Avoid leakages during vehicles maintenance. | | | | | | | | | |
| 4.5.2.2 | Palm oil millers shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. - Major compliance - | The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the Mill annual budget. | Complied | | | | | | | | |
| 4.5.2.3 | The use of renewable energy should be applied where possible. - Minor compliance - | The fiber and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fiber are delivered to estates for multi purposes or sold to outside buyers. EFB is used in the estates for mulching. | Complied | | | | | | | | |
| Criterion 4.5.3: Waste management and disposal | | | | | | | | | | | |
| 4.5.3.1 | All waste products and sources of pollution shall be identified and documented. - Major compliance - | <div>All waste and pollution are identified and documented in the Waste Management Action Plan. The compilation for 2024 was made at by the Sustainability Department applicable to the mill recent review dated 14/06/2024. Details of waste generated from the mill operations among others as shown below:</div> <table><tr><th>Waste</th><th>Item</th><th>Sources</th></tr><tr><td rowspan="2">Scheduled Waste</td><td>Spent lubricants/ hydraulic oil</td><td>Workshop activities</td></tr><tr><td>Used batteries/ used rags/ empty containers</td><td>Workshop activities</td></tr></table> | Waste | Item | Sources | Scheduled Waste | Spent lubricants/ hydraulic oil | Workshop activities | Used batteries/ used rags/ empty containers | Workshop activities | Complied |
| Waste | Item | Sources | | | | | | | | | |
| Scheduled Waste | Spent lubricants/ hydraulic oil | Workshop activities | | | | | | | | | |
| | Used batteries/ used rags/ empty containers | Workshop activities | | | | | | | | | |

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| | | | Hexane/ chemicals/ spent empty containers | Laboratory and boiler station | |
| | | Domestic Waste | Rubbish | Line site/ office & mill complex | |
| | | | Sewage | Line site/ office & mill complex | |
| | | Industrial Waste | POME | Effluent Treatment Plant | |
| | | | EFB | EFB station | |
| | | The source of mill pollution generated from the mill is the smoke from the boiler. It is monitored from the stack emission during the entire operations. These reports are reviewed by the mill and submitted to DOE. Details as provided in 4.5.4.1 below. | | | |
| 4.5.3.2 | A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for: a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. - Major compliance - | The disposal/recycling of waste generated by the mill are made as follows: | | | Minor Non-Conformity |
| | | Type | Item | Action/Program | |
| | | Scheduled waste | Spent lubricants/ hydraulic oil | SOP titled SW Management Compliance to Environmental Quality Regulation 2005; Establishment & notification of SW Labeling & Coding of SW SW Inventory Disposal < 180 days & approved quantity/volume. | |
| | | | Used batteries/ used rags/ empty containers | | |
| | | | Hexane/ spent chemicals/ | | |

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| | | | empty containers | | |
| | | Domestic Waste | Rubbish | Disposed together with the estate to UIE Estate landfill | |
| | | | Sewage | Disposal by local authority | |
| | | Industrial Waste | POME | Monitoring of application & through operation of land application | |
| | | | EFB | Monitoring of application in the field. | |
| | | <p>The mill has established the waste management for an environmentally friendly operation. There are no summons/ notices by the DOE/ DOSH/ Others agencies during the period of review.</p> <p>Observed during site visit, a few spots of contaminated soil were evident at mill's workshop/open parking area. However, waste type/category for contaminated soil (dripping/leakage from tractor) was not identified in the waste management plan dated 10/2/2024 under UIE Engineering Department, thus minor conformity has been raised.</p> | | | |
| 4.5.3.3 | <p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p>- Major compliance -</p> | <p>The SOP on Scheduled Waste disposal is established and implemented.</p> <p>i. Details as provided in UPB Standard Operating Procedure Handling of Scheduled Waste (Hazardous Waste) Management dated 09/04/2021.</p> <p>ii. The inventory of the waste generated is recorded using the "E-SWISS" inventory system. Methodology of SW disposal is also described in indicator 4.5.3.2 above.</p> | | | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|--------|--------|--------|--------|--------|--------|--------|----------|---|---|---|---|---|---|-------|----------|---|---|---|---|---|---|-------|----------|-------|-------|-------|-------|-------|-------|---|----------|-------|-------|-------|-------|-------|-------|---|--|
| | | <div>iii. All SW are disposed to YXXXXXXA Rxxxxxxxxxn Sdn Bhd Kxxxa Pxxk Sdn Bhd / EXXXA Sxxxxxxxxs Sdn Bhd, Kxxxa Pxxk Rxxxxxd Sdn Bhd, Hxxu Sxxxxr / SP Mxxxo (M) Sdn Bhd depending on the type of SW. All vendors possessed valid license from DOE expiring 30/4/2025. Details of disposal sample as shown below:</div> <table><tr><th>Date</th><th>SW 409</th><th>SW 306</th><th>SW 322</th><th>SW 110</th><th>SW 410</th><th>SW 305</th><th>SW 102</th></tr><tr><td>31/01/24</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>1.050</td></tr><tr><td>28/08/23</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>0.990</td></tr><tr><td>29/06/24</td><td>0.630</td><td>1.220</td><td>0.040</td><td>0.100</td><td>0.330</td><td>3.870</td><td>-</td></tr><tr><td>30/03/24</td><td>0.250</td><td>0.980</td><td>0.050</td><td>0.095</td><td>0.528</td><td>4.100</td><td>-</td></tr></table> | Date | SW 409 | SW 306 | SW 322 | SW 110 | SW 410 | SW 305 | SW 102 | 31/01/24 | - | - | - | - | - | - | 1.050 | 28/08/23 | - | - | - | - | - | - | 0.990 | 29/06/24 | 0.630 | 1.220 | 0.040 | 0.100 | 0.330 | 3.870 | - | 30/03/24 | 0.250 | 0.980 | 0.050 | 0.095 | 0.528 | 4.100 | - | |
| Date | SW 409 | SW 306 | SW 322 | SW 110 | SW 410 | SW 305 | SW 102 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 31/01/24 | - | - | - | - | - | - | 1.050 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 28/08/23 | - | - | - | - | - | - | 0.990 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 29/06/24 | 0.630 | 1.220 | 0.040 | 0.100 | 0.330 | 3.870 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 30/03/24 | 0.250 | 0.980 | 0.050 | 0.095 | 0.528 | 4.100 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.3.4 | Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance - | Domestic waste was disposed according to the waste management plan. Verified that the management has disposed the domestic waste through UIE Estate field no 19 - PM2024 Collection are made from a centralized point accumulated internally by the mill management from the living quarters and office complex. The risk of contamination has been minimized through this system. | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criterion 4.5.4: Reduction of pollution and emission including greenhouse gas | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.4.1 | An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance - | The polluting activities are identified and documented in the Environment Impact Assessment - Management Actions Plans & Continuous Improvement Plan 2024. The identified impact if any will be included in the management plan. The evaluation is documented in the Environmental Impact Evaluation records which covers the mill activities / operation. The same document is used to identify the waste products and sources of pollution, which was | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | |
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| | | <p>in place and is reviewed accordingly. Among others the significant environmental receptors for the mill operations were:</p> <ul style="list-style-type: none"> i. Air - Air emissions from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping). ii. Water - Water discharges from cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down. iii. Land - Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics. <p>UIE Palm Oil Mill conducted boiler stack sampling for each of the boiler stack by M/s CXX Mxxxi Sxxxxxxs Sdn Bhd Klang Selangor. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS) has been verified to be in functional condition. Data from the stack is connected online to DOE's office. Boiler smoke emission data are within the DOE limit.</p> <table border="1"> <thead> <tr> <th>Boiler Regn No</th><th>Date</th><th>mg/m3</th><th>Std mg/m3</th></tr> </thead> <tbody> <tr> <td>PK PMD 80415</td><td>30/05/2024</td><td>133</td><td>150</td></tr> <tr> <td>PK PMD 3869</td><td>19/03/2024</td><td>93</td><td>150</td></tr> <tr> <td>PK PMD 82263</td><td>19/03/2024</td><td>93</td><td>150</td></tr> </tbody> </table> <p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. The 'Environment Impact Assessment - Management Actions Plans & Continuous Improvement Plan 2024' is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly.</p> | Boiler Regn No | Date | mg/m3 | Std mg/m3 | PK PMD 80415 | 30/05/2024 | 133 | 150 | PK PMD 3869 | 19/03/2024 | 93 | 150 | PK PMD 82263 | 19/03/2024 | 93 | 150 | |
| Boiler Regn No | Date | mg/m3 | Std mg/m3 | | | | | | | | | | | | | | | | |
| PK PMD 80415 | 30/05/2024 | 133 | 150 | | | | | | | | | | | | | | | | |
| PK PMD 3869 | 19/03/2024 | 93 | 150 | | | | | | | | | | | | | | | | |
| PK PMD 82263 | 19/03/2024 | 93 | 150 | | | | | | | | | | | | | | | | |

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| | | <p>Among others action been taken by the mill were:</p> <ul style="list-style-type: none">i. Scheduled wastes – disposed to respective licensed buyer as shown in 4.5.3.3.ii. Domestic wastes are managed and disposed at the Estate 1 landfill. Collection on daily basis.iii. Full compliance to zero burning practiceiv. Monitoring of environmental issues recorded in EPMC minutes of meeting. | | | | | | | | | |
| 4.5.4.2 | <p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p> | <p>The The "Environment Impact Assessment - Management Actions Plans & Continuous Improvement Plan 2024" was established at the mill and reviewed annually. The following issues and mitigation program among others have been identified. The improvement plan include:</p> <table><tr><th>Issues & Strategies</th><th>Action Plan</th></tr><tr><td>Reduce diesel consumption at mill operation</td><td>To monitor diesel usage To ensure vehicle scheduled maintenance maximize operation of gas engine</td></tr><tr><td>Reduce smoke emission to the air</td><td>To effectively implement the CEMS Eliminate use of wet shell as fuel</td></tr><tr><td>Reduce electricity usage</td><td>Monitor usage vs baseline install capacitor at identified large power consumption motor Installation solar panel in 2025 & LED bulb for the lighting system</td></tr></table> <p>All efforts and action plan for the identified pollutants and emission above is adequate to comply with the requirement. All identified</p> | Issues & Strategies | Action Plan | Reduce diesel consumption at mill operation | To monitor diesel usage To ensure vehicle scheduled maintenance maximize operation of gas engine | Reduce smoke emission to the air | To effectively implement the CEMS Eliminate use of wet shell as fuel | Reduce electricity usage | Monitor usage vs baseline install capacitor at identified large power consumption motor Installation solar panel in 2025 & LED bulb for the lighting system | Complied |
| Issues & Strategies | Action Plan | | | | | | | | | | |
| Reduce diesel consumption at mill operation | To monitor diesel usage To ensure vehicle scheduled maintenance maximize operation of gas engine | | | | | | | | | | |
| Reduce smoke emission to the air | To effectively implement the CEMS Eliminate use of wet shell as fuel | | | | | | | | | | |
| Reduce electricity usage | Monitor usage vs baseline install capacitor at identified large power consumption motor Installation solar panel in 2025 & LED bulb for the lighting system | | | | | | | | | | |

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| | | issues have significant impacts to the environment. The mill also monitored and maintained records on Palm GHG. This compilation is made at Head Office level and made for the entire BU. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.4.3 | <p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p>- Major compliance -</p> | <p>The treated mill effluent discharge is regularly monitored as prescribed in the “Jadual Pematuhan” license no 004239 01/07/2024 - 30/06/2025 issued to the mill. The limit for the Biochemical Oxygen Demand (BOD) discharge is < 5000 mg/l for land application. Regular monitoring is made on monthly basis and quarterly. In addition, daily site checking on the effluent ponds are made by the supervisory personnel and effluent attendants. Reports for the effluent parameters are submitted using “Borang Penyata Suku Tahun”to DOE for compliance. Sighted the effluent results. All parameters comply to the DOE requirement. (Units in mg/l except for pH). Analysis is made by Union Laboratories Sdn Bhd located in Seberang Prai Pulau Pinang.</p> <table><tr><td>Parameters</td><td>Std</td><td>17/01/24</td><td>06/02/24</td><td>05/03/24</td></tr><tr><td>PH</td><td>5-9</td><td>8.80</td><td>8.40</td><td>8.70</td></tr><tr><td>BOD</td><td>5000</td><td>73.00</td><td>291.00</td><td>215.00</td></tr><tr><td>COD</td><td>-</td><td>1774.00</td><td>2405.00</td><td>2110.00</td></tr><tr><td>Total Solids</td><td>-</td><td>7190.00</td><td>6720.00</td><td>4612.00</td></tr><tr><td>S Solids</td><td>-</td><td>305.00</td><td>455.00</td><td>475.00</td></tr><tr><td>Oil & grease</td><td>-</td><td>2.00</td><td>2.00</td><td>2.00</td></tr><tr><td>A Nitrogen</td><td>-</td><td>85.80</td><td>108.70</td><td>87.80</td></tr><tr><td>Total N</td><td>-</td><td>90.10</td><td>174.50</td><td>92.00</td></tr></table> <p>The mill had maintained the BOD well below the permissible limit of 5000 mg/l. Under the continuous improvement plan the mill had the flowing plan in relation to the effluent management improvement.</p> | Parameters | Std | 17/01/24 | 06/02/24 | 05/03/24 | PH | 5-9 | 8.80 | 8.40 | 8.70 | BOD | 5000 | 73.00 | 291.00 | 215.00 | COD | - | 1774.00 | 2405.00 | 2110.00 | Total Solids | - | 7190.00 | 6720.00 | 4612.00 | S Solids | - | 305.00 | 455.00 | 475.00 | Oil & grease | - | 2.00 | 2.00 | 2.00 | A Nitrogen | - | 85.80 | 108.70 | 87.80 | Total N | - | 90.10 | 174.50 | 92.00 | Complied |
| Parameters | Std | 17/01/24 | 06/02/24 | 05/03/24 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PH | 5-9 | 8.80 | 8.40 | 8.70 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BOD | 5000 | 73.00 | 291.00 | 215.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| COD | - | 1774.00 | 2405.00 | 2110.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Solids | - | 7190.00 | 6720.00 | 4612.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| S Solids | - | 305.00 | 455.00 | 475.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oil & grease | - | 2.00 | 2.00 | 2.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| A Nitrogen | - | 85.80 | 108.70 | 87.80 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total N | - | 90.10 | 174.50 | 92.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <div>i. Effluent pond system – to remove solid content in cooling pond under desludging program</div> <div>ii. Commissioning of new decanter in Dec 2023, reducing solids</div> | | | | | | | | | | | | | | | | |
| Criterion 4.5.5: Natural water resources | | | | | | | | | | | | | | | | | | |
| 4.5.5.1 | <div>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</div> <div><div>a) Assessment of water usage and sources.</div><div>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill’s current activities.</div><div>c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</div></div> <div>- Major compliance -</div> | <div>The mill had established its Water Management Plan 2024 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as:</div> <div><div>i. Implementation of rainwater harvest,</div><div>ii. Scheduled water pumping for effective management from the source Sg Bruas.</div><div>iii. Daily monitoring of bund / scheduled maintenance</div><div>iv. Optimum usage of water and monitor for any leakage in the system.</div></div> <div>a) The water sources and usage are shown below as shown below:</div> <table><tr><td>Water sources</td><td>Usage</td><td>Monitoring</td></tr><tr><td>Extraction Sg Bruas</td><td>Mill processing</td><td>Monitoring water supply</td></tr><tr><td>LAP - Water supply</td><td>Domestic use</td><td>Monitoring water supply</td></tr><tr><td>Rainwater</td><td>External use/ Workshop</td><td>Rain fall data</td></tr><tr><td>Water tank</td><td>Emergency water supply</td><td>-</td></tr></table> | Water sources | Usage | Monitoring | Extraction Sg Bruas | Mill processing | Monitoring water supply | LAP - Water supply | Domestic use | Monitoring water supply | Rainwater | External use/ Workshop | Rain fall data | Water tank | Emergency water supply | - | Complied |
| Water sources | Usage | Monitoring | | | | | | | | | | | | | | | | |
| Extraction Sg Bruas | Mill processing | Monitoring water supply | | | | | | | | | | | | | | | | |
| LAP - Water supply | Domestic use | Monitoring water supply | | | | | | | | | | | | | | | | |
| Rainwater | External use/ Workshop | Rain fall data | | | | | | | | | | | | | | | | |
| Water tank | Emergency water supply | - | | | | | | | | | | | | | | | | |

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| | | The water consumption with comparison in three financial years is shown below; (Unit in mt) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | <table><tr><td>Details</td><td>2021</td><td>2022</td><td>2023</td></tr><tr><td>Total Water/m3</td><td>398690</td><td>367560</td><td>370250</td></tr><tr><td>FFB /mt</td><td>284199</td><td>281922</td><td>290613</td></tr><tr><td>Water /FFB mt</td><td>1.402</td><td>1.303</td><td>1.274</td></tr></table> | | | | Details | 2021 | 2022 | 2023 | Total Water/m3 | 398690 | 367560 | 370250 | FFB /mt | 284199 | 281922 | 290613 | Water /FFB mt | 1.402 | 1.303 | 1.274 | | | | | | | | | | | | |
| Details | 2021 | 2022 | 2023 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Water/m3 | 398690 | 367560 | 370250 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| FFB /mt | 284199 | 281922 | 290613 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Water /FFB mt | 1.402 | 1.303 | 1.274 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | b) The monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill’s current activities is made by the following practices The mill made water analysis at the upstream and downstream for detection of any pollution related to the mill operations. The location is approx. 5 km from the mill complex. Results of water samples dated 19/03/2024 taken at 4 points at Sg Bruas was sighted and verified with all parameters within the permissible limits. Analysis is made by Union Laboratories and results are submitted to DOE quarterly. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | <table><tr><td>19/03/2024</td><td>Inlet Field 01</td><td>Outlet Field 110</td></tr><tr><td>pH</td><td>3.9</td><td>3.1</td></tr><tr><td>BOD mg/L</td><td>5.00</td><td>2.0</td></tr><tr><td>COD mg/L</td><td>46.00</td><td>23.0</td></tr><tr><td>S Solids mg/l</td><td>60.00</td><td>23.0</td></tr><tr><td>Oil & Grease</td><td>1.00</td><td>ND<1</td></tr><tr><td>D Oxygen</td><td>8.73</td><td>8.56</td></tr><tr><td>A Nitrogen</td><td>ND<0.3</td><td>ND<0.3</td></tr><tr><td>E Coli cfu/100ml</td><td>9.00</td><td>4.00</td></tr></table> | | | | 19/03/2024 | Inlet Field 01 | Outlet Field 110 | pH | 3.9 | 3.1 | BOD mg/L | 5.00 | 2.0 | COD mg/L | 46.00 | 23.0 | S Solids mg/l | 60.00 | 23.0 | Oil & Grease | 1.00 | ND<1 | D Oxygen | 8.73 | 8.56 | A Nitrogen | ND<0.3 | ND<0.3 | E Coli cfu/100ml | 9.00 | 4.00 | |
| 19/03/2024 | Inlet Field 01 | Outlet Field 110 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| pH | 3.9 | 3.1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BOD mg/L | 5.00 | 2.0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| COD mg/L | 46.00 | 23.0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| S Solids mg/l | 60.00 | 23.0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oil & Grease | 1.00 | ND<1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| D Oxygen | 8.73 | 8.56 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| A Nitrogen | ND<0.3 | ND<0.3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| E Coli cfu/100ml | 9.00 | 4.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>c) Ways to optimize water and nutrient usage and reduce wastage.</p> <p>The management of water and wastage reduction / optimization is summarized below:</p> <table><tr><td>location</td><td>Wastewater produced</td><td>Treatment/containment</td><td>Reuse/disposal</td></tr><tr><td>Processing stations</td><td>Clarification condensate Sterilizer condensate Floor cleaning water</td><td>Oil recovery/ETP</td><td>Final point to the effluent pond</td></tr><tr><td>Boiler</td><td>Blow down, cleaning water</td><td>Sludge pit, ETP</td><td>Final point to the effluent pond</td></tr><tr><td>Process ramp</td><td>Rainfall runoff</td><td>Sedimentation trap</td><td>Final point to the effluent pond</td></tr><tr><td>Engine room</td><td>Steam condensate, turbine cooling water</td><td>Sludge pit,</td><td>Final point to the effluent pond</td></tr><tr><td>Laboratory</td><td>Cleaning water</td><td>Sludge pit,</td><td>Final point to the effluent pond</td></tr><tr><td>Wash room</td><td>Toilet water, cleaning water</td><td>Septic tank</td><td>Collected by licensed contractor.</td></tr></table> | | | | location | Wastewater produced | Treatment/containment | Reuse/disposal | Processing stations | Clarification condensate Sterilizer condensate Floor cleaning water | Oil recovery/ETP | Final point to the effluent pond | Boiler | Blow down, cleaning water | Sludge pit, ETP | Final point to the effluent pond | Process ramp | Rainfall runoff | Sedimentation trap | Final point to the effluent pond | Engine room | Steam condensate, turbine cooling water | Sludge pit, | Final point to the effluent pond | Laboratory | Cleaning water | Sludge pit, | Final point to the effluent pond | Wash room | Toilet water, cleaning water | Septic tank | Collected by licensed contractor. | |
| location | Wastewater produced | Treatment/containment | Reuse/disposal | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Processing stations | Clarification condensate Sterilizer condensate Floor cleaning water | Oil recovery/ETP | Final point to the effluent pond | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Boiler | Blow down, cleaning water | Sludge pit, ETP | Final point to the effluent pond | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Process ramp | Rainfall runoff | Sedimentation trap | Final point to the effluent pond | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Engine room | Steam condensate, turbine cooling water | Sludge pit, | Final point to the effluent pond | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Laboratory | Cleaning water | Sludge pit, | Final point to the effluent pond | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Wash room | Toilet water, cleaning water | Septic tank | Collected by licensed contractor. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>The contingency plan during water shortage/ contamination as shown below:</p> <ul style="list-style-type: none"> i. Water shortage/ prolonged dry season <ul style="list-style-type: none"> - To obtain water from local authority/ estate catchment - To train/ educate staff/ workers to conserve water - To seek assistance from local authority ii. Severe water pollution/ Contamination <ul style="list-style-type: none"> - To obtain water from local authority - To train/ educate staff/ workers to conserve water - To seek assistance from local authority | |
| 4.5.5.2 | <p>Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.</p> <p>- Major compliance -</p> | <p>POME is discharged through land application via farrows at UIE Estate field no 61 (Final Discharge Holding Pond as stated in the DOE Compliance Schedule.</p> <p>Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. Effluent Analysis conducted by accredited laboratory and submitted to DOE every 3 months through OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly. The application field was visited and verified with no sign of overflowing observed.</p> | Complied |
| 4.6 Principle 6: Best Practices | | | |
| Criterion 4.6.1: Mill Management | | | |
| 4.6.1.1 | <p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> | <p>Standard operating procedures has been appropriately documented and consistently implemented and monitored. The Standard Operating procedure (SOP) described details from the reception,</p> | Complied |

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| | - Major compliance - | sterilization station, threshing station, pressing station, clarification station, nut station, effluent, laboratory, workshop, dispatches station etc. Sighted the evidence: <table><tr><td>Document</td><td>Standard Operating Procedure</td></tr><tr><td>Effective Date</td><td>Year 2024</td></tr><tr><td>Category</td><td>Staffs and workers</td></tr></table> | Document | Standard Operating Procedure | Effective Date | Year 2024 | Category | Staffs and workers | | | |
| Document | Standard Operating Procedure | | | | | | | | | | |
| Effective Date | Year 2024 | | | | | | | | | | |
| Category | Staffs and workers | | | | | | | | | | |
| 4.6.1.2 | All palm oil mills shall implement best practices. - Major compliance - | The monitoring of all process parameters is documented and summarized in a daily report and monthly report of production. In addition, there are audits by sustainability department This is to ensure compliance to policies, procedures in relation mill operations, financial, OSH, welfare among others. Sighted the evidence: <table><tr><td>Document 1</td><td>Production Report – Daily Basis</td></tr><tr><td>Document 2</td><td>Internal Audit Report – Once a Year</td></tr><tr><td>Document 3</td><td>Workplace Inspection – Monthly Basis</td></tr><tr><td>Document 4</td><td>laboratory Analysis – Daily Basis</td></tr></table> | Document 1 | Production Report – Daily Basis | Document 2 | Internal Audit Report – Once a Year | Document 3 | Workplace Inspection – Monthly Basis | Document 4 | laboratory Analysis – Daily Basis | Complied |
| Document 1 | Production Report – Daily Basis | | | | | | | | | | |
| Document 2 | Internal Audit Report – Once a Year | | | | | | | | | | |
| Document 3 | Workplace Inspection – Monthly Basis | | | | | | | | | | |
| Document 4 | laboratory Analysis – Daily Basis | | | | | | | | | | |
| Criterion 4.6.2: Economic and financial viability plan | | | | | | | | | | | |
| 4.6.2.1 | A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance - | The management plan has established mechanism to demonstrate attention to economic and financial viability through long-term management planning. The management has prepared budget and production report. Refer to report it was mentioned the allocation of production cost for FFB processed, CPO produced and PK produced. Sighted the evidence: <table><tr><td>Document</td><td>Mill Production Report</td></tr><tr><td>Month</td><td>May 2024</td></tr><tr><td>FFB Processed (Estimate)</td><td>22,448.00 Mt</td></tr><tr><td>FFB Processed (Actual)</td><td>25,862.81 Mt</td></tr></table> | Document | Mill Production Report | Month | May 2024 | FFB Processed (Estimate) | 22,448.00 Mt | FFB Processed (Actual) | 25,862.81 Mt | Complied |
| Document | Mill Production Report | | | | | | | | | | |
| Month | May 2024 | | | | | | | | | | |
| FFB Processed (Estimate) | 22,448.00 Mt | | | | | | | | | | |
| FFB Processed (Actual) | 25,862.81 Mt | | | | | | | | | | |

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| | | CPO Produced (Estimate) | 5,060.00 Mt | |
| | | CPO Produced (Actual) | 5,609.64 Mt | |
| | | PK Produced (Estimate) | 1,010.00 Mt | |
| | | PK Produced (Actual) | 959.36 Mt | |
| Criterion 4.6.3: Transparent and fair price dealing | | | | |
| 4.6.3.1 | Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance - | Evident the contractor agreement between United Plantations Berhad and contractors as below: 1. Exxxxxxt Inxxxxt Sdn Bhd – to arrange for hiring vehicles or use their own, if any, to transport Crude Palm Oil from the Hirer’s Palm Oil Mills to the destinations as stipulated by the Hirer. The contractors agrees that the hiring of the contractor’s vehicles is at the sole discretion of the Hirer. The agreement made on 01/01/2024. The transport rates as per letter dated 29/04/2020 (Appendix 1) are to be revised monthly based on the average monthly diesel prices as announced by the Government. The agreement signed and delivered by Company Secretary and Exxxxxxt Inxxxxt Sdn Bhd. The agreement is valid from 1 January 2024 to 31 December 2024 unless terminated earlier under Clause 8. 2. Saxxhy Trxxxxxrt Sdn Bhd - to arrange for hiring vehicles or use their own, if any, to transport Crude Palm Oil from the Hirer’s Palm Oil Mills to the destinations as stipulated by the Hirer. The contractors agrees that the hiring of the contractor’s vehicles is at the sole discretion of the Hirer. The agreement made on 01/01/2024. The transport rates as per letter dated 29/04/2020 (Appendix 1) are to be revised monthly based on the average monthly diesel prices as announced by the Government. The | | Complied |

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| | | <p>agreement signed and delivered by Company Secretary and Saxxhy Trxxxxrt Sdn Bhd. The agreement is valid from 1 January 2024 to 31 December 2024 unless terminated earlier under Clause 8.</p> <p>3. Sxi Nexxxh Axxxxy - to arrange for hiring vehicles or use their own, if any, to transport Crude Palm Oil from the Hirer's Palm Oil Mills to the destinations as stipulated by the Hirer. The contractors agrees that the hiring of the contractor's vehicles is at the sole discretion of the Hirer. The agreement made on 01/01/2024. The transport rates as per letter dated 29/04/2020 (Appendix 1) are to be revised monthly based on the average monthly diesel prices as announced by the Government. The agreement signed and delivered by Company Secretary and Sxi Nexxxh Axxxxy. The agreement is valid from 1 January 2024 to 31 December 2024 unless terminated earlier under Clause 8.</p> | |
| 4.6.3.2 | <p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p> | <p>The management has established pricing mechanism and conducted as per contract agreement with contractors.</p> <p>Review on the contract agreement, sighted pricing of the job task is available. Payment terms for contract work were stated in the contract agreement as stated in 4.6.3.1.</p> <p>Also stated in the agreement:</p> <ol style="list-style-type: none"> 1. The Hirer will pay to the Contractor during the continuance of this agreement the rates agreed in Clause No 2 on delivered weight basis for goods actually transported by the Contractor's vehicles. 2. The Hirer undertakes to settle the Contractor's bills on respect of the transport charges regularly within 30 days from receipts of such bills, etc. | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| | | <p>Evident:</p> <ol style="list-style-type: none"> 1. The payment voucher from United Plantations Berhad to Exxxxxt Inxxxxt Sdn Bhd dated 11/06/2024, No.:0324012170 as CPO Transporter and Invoice No.: 19024 dated 31/05/2024. 2. The payment voucher from United Plantations Berhad to Saxxhy Trxxxxrt Sdn Bhd dated 11/06/2024, No.:0324012172 as CPO Transporter and Invoice No.: 19024 dated 31/05/2024. 3. The payment voucher from United Plantations Berhad to Sxi Nexxh Axxxxy dated 11/06/2024, No.:0324012169 as CPO Transporter and Invoice No.: S 19356 dated 31/05/2024. <p>Onsite consultation with contractors informed their payments were made as per payment terms stated in the contracts. No delayed of payments recorded.</p> | |
| Criterion 4.6.4: Contractor | | | |
| 4.6.4.1 | <p>In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p> | <p>Evident the contractor agreement between United Plantations Berhad and contractors. Stated in the agreement:</p> <p>The contractor shall:</p> <p>Clause (m): Comply with RSPO Supply Chain Standard and MSPO Supply Chain Certification System for handling RSPO/MSPO certified Crude Palm Oil</p> <p>Clause (o): Ensure the RSPO and MSPO certified oil shall be kept segregated from all other conventional oils throughout the journey.</p> <p>Clause (11): The contractor shall adhere to the attached UP's Company Policies as follow which are required under MSPO and RSPO certifications such as Human Rights Policy (e.g.: no child labor and trafficked labor and equal treatment), OSH policy, gender</p> | Complied |

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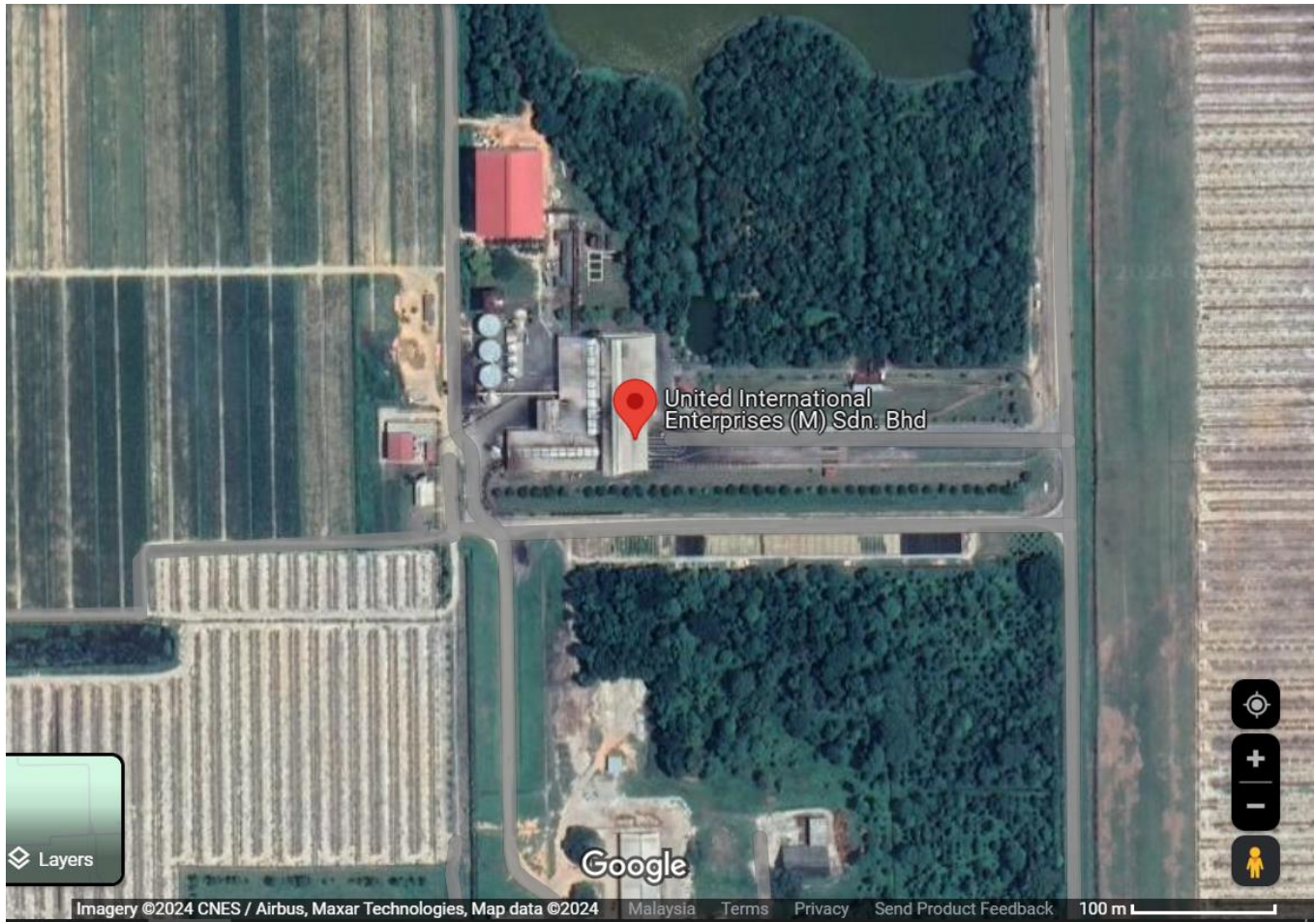
| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| | | policy, valid employment contract for contractor workers, minimum wages order, etc. | |
| 4.6.4.2 | <p>The management shall provide evidence of agreed contracts with the contractor.</p> <p>- Major compliance -</p> | <p>Evident the contractor agreement between United Plantations Berhad and contractors as follows:</p> <ol style="list-style-type: none"> 1. Exxxxxxt Inxxxxt Sdn Bhd – to arrange for hiring vehicles or use their own, if any, to transport Crude Palm Oil from the Hirer's Palm Oil Mills to the destinations as stipulated by the Hirer. The contractors agrees that the hiring of the contractor's vehicles is at the sole discretion of the Hirer. The agreement made on 01/01/2024. The transport rates as per letter dated 29/04/2020 (Appendix 1) are to be revised monthly based on the average monthly diesel prices as announced by the Government. The agreement signed and delivered by Company Secretary and Exxxxxxt Inxxxxt Sdn Bhd. The agreement is valid from 1 January 2024 to 31 December 2024 unless terminated earlier under Clause 8. 2. Saxxhy Trxxxxxrt Sdn Bhd - to arrange for hiring vehicles or use their own, if any, to transport Crude Palm Oil from the Hirer's Palm Oil Mills to the destinations as stipulated by the Hirer. The contractors agrees that the hiring of the contractor's vehicles is at the sole discretion of the Hirer. The agreement made on 01/01/2024. The transport rates as per letter dated 29/04/2020 (Appendix 1) are to be revised monthly based on the average monthly diesel prices as announced by the Government. The agreement signed and delivered by Company Secretary and Saxxhy Trxxxxxrt Sdn Bhd. The agreement is valid from 1 January 2024 to 31 December 2024 unless terminated earlier under Clause 8. | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | 3. Sxi Nexxxh Axxxxy - to arrange for hiring vehicles or use their own, if any, to transport Crude Palm Oil from the Hirer's Palm Oil Mills to the destinations as stipulated by the Hirer. The contractors agrees that the hiring of the contractor's vehicles is at the sole discretion of the Hirer. The agreement made on 01/01/2024. The transport rates as per letter dated 29/04/2020 (Appendix 1) are to be revised monthly based on the average monthly diesel prices as announced by the Government. The agreement signed and delivered by Company Secretary and Sxi Nexxxh Axxxxy. The agreement is valid from 1 January 2024 to 31 December 2024 unless terminated earlier under Clause 8. | |
| 4.6.4.3 | The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance - | Stated in the agreement that the contractors are subject to any audits including verifications by the appointed third-party assurance body. | Complied |

Appendix B: Smallholder Member Details

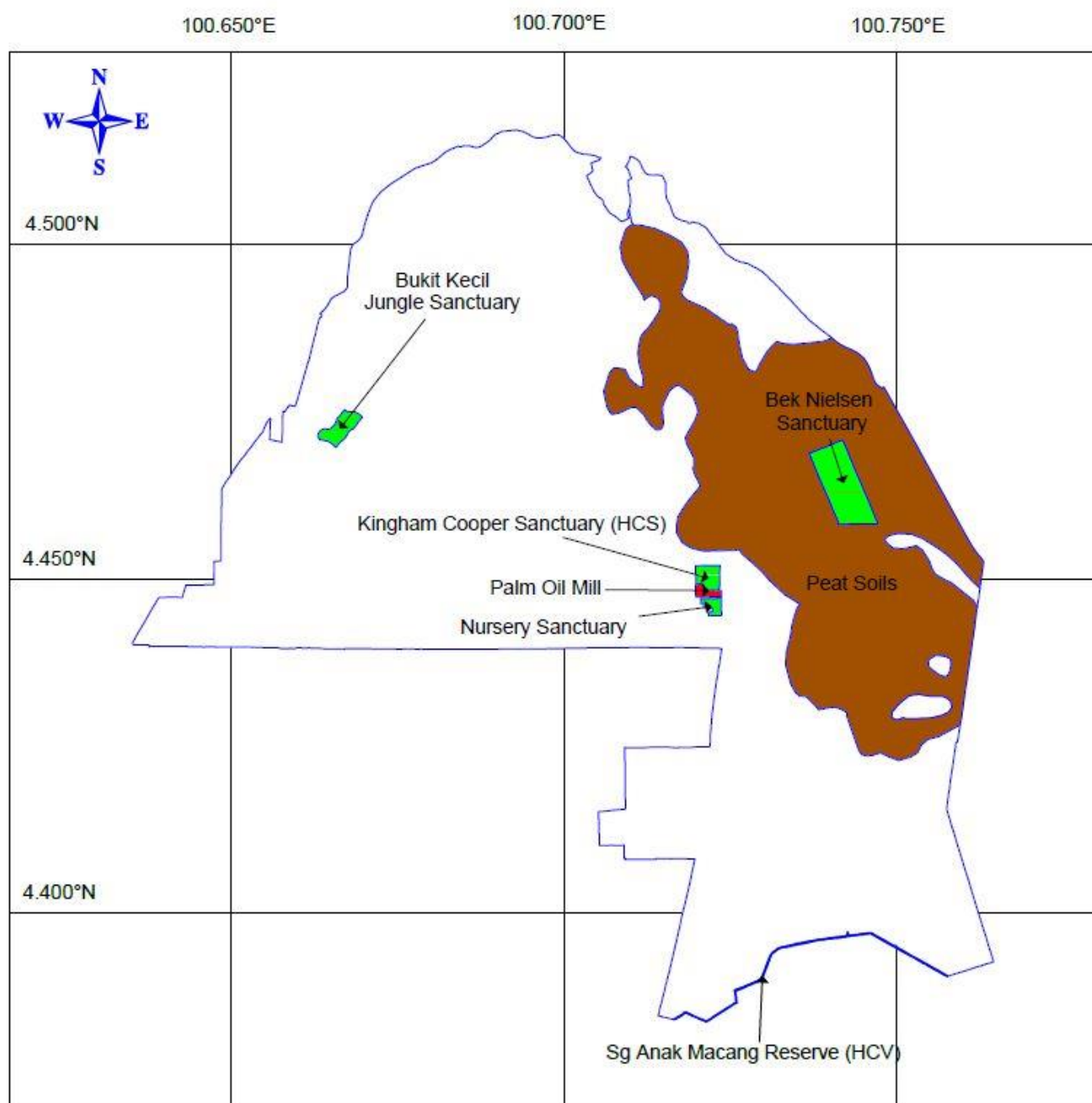
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Appendix C: Location and Field Map**UIE Palm Oil Mill**

UIE Estates



United Plantations Berhad
UIE Estates



MSPO Public Summary Report
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| | |
|------|------------------------------------------------|
| BOD | Biochemical Oxygen Demand |
| CB | Certification Bodies |
| CHRA | Chemical Health Risk Assessment |
| COD | Chemical Oxygen Demand |
| CPO | Crude Palm 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 |
| ISCC | International Sustainable Carbon Certification |
| LD50 | Lethal Dose for 50 sample |
| MSPO | Malaysian Sustainable Palm Oil |
| 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 |
| RTE | Rare, Threatened or Endangered species |
| SEIA | Social & Environmental Impact Assessment |
| SIA | Social Impact Assessment |
| SOP | Standard Operating Procedure |